ORA DATA REQUEST
ORA-SDGE-129-FH2
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 12, 2018
DATE RESPONDED: FRBRUARY 22, 2018

Exhibit Reference: SDG&E-31, pages 20-24
SDG&E Witness: Sandra K. Hrna
Subject: Legal

Please provide the following:

   1. Following up on the **CONF ORA-SDGE-077-FH2 Attachment**, please explain why SDG&E only allows insurance reimbursement for claims of $4 million and over. Provide workpaper references and documents to justify the reason(s)..

SDG&E Response 01:

SDG&E's general excess liability insurance policy has a self-insured retention of $4 million. This means that our general excess insurance program requires SDG&E to pay $4 million for each claim before insurance would apply. For more information on SDG&E's insurance program, please see the testimony of Neil K. Cayabyab (SCG-29/SDG&E-27).

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2. Following up on the attachment, **Updated ORA-SDGE-040-FH2 Question 3 (Recovery Payment list)-CONFIDENTIAL**, please address the reason(s) why SDG&E mistakenly omitted some payments paid by SDG&E to some vendors from the 2019 GRC forecast and provide the reason(s) why SDG&E did not correct the omission before filing its 2019 GRC application.

SDG&E Response 02:

While compiling information for the 2019 GRC forecast, some payments paid by SDG&E to some vendors were inadvertently omitted due to an oversight.

SDG&E did not correct the omission before filing its 2019 GRC application because SDG&E did not discover the omission until compiling information for ORA's data request, which was submitted after SDG&E filed its the 2019 GRC application.