

**PUBLIC ADVOCATES OFFICE (Cal Advocates)
DATA RESPONSE**

**San Diego Gas and Electric Company CEMA for 2014 Emergency Drought,
2017 Storm and Lilac Fire, 2018 West Fire, 2019 Winter Storm, 2020 Covid-
19 Pandemic, and 2020 Extreme Heat Events and Valley Fire
A.22-10-021**

Date: August 16, 2023

Origination Date: August 3, 2023

Response Due: August 17, 2023

Data Request No: SDG&E Data Request Set Number 1

To: Paul A. Szymanski (PSzymanski@sdge.com)
Kristopher Bourbois (KBourbois@sdge.com)
Craig Gentes (CGentes@sdge.com)

From: Sophie Chia
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102
sophie.chia@cpuc.ca.gov

**The following questions relate to the following statements Cal Advocates’
Testimony at page 10:**

“Cal Advocates disagrees with SDG&E’s determination that overhead costs associated with the non-labor portion of the capital work is incremental. Cal Advocates considers overheads already recovered in rates as part of SDG&E’s General Rate Case’s (GRC’s) previously authorized funding levels and should not be considered incremental. Cal Advocates disagrees with SDG&E’s rationale and recommends the Commission deny SDG&E’s CEMA recovery request for incremental overhead costs....”

SDG&E’s Question #1:

Please identify by CPUC Application proceeding number and, if applicable, the associated decision number the SDG&E General Rate Case proceedings that Cal Advocates reviewed in preparation of its testimony submitted in A.22-10-021.

Cal Advocates' Response to Question #1:

Cal Advocates based its recommendation on its review of SDG&E's testimonies and responses to Cal Advocates' data requests in A.22-10-021 in preparation of its testimony and recommendation.

SDG&E's Question #2:

Please identify by CPUC Application proceeding number the SDG&E referenced in the preceding quote.

Cal Advocates' Response to Question #2:

Please see response to Question #1.

SDG&E's Question #3:

Please provide, with specificity and reference to each proceeding and page number, a list of each and every fact that support Cal Advocates' Testimony's assertion that "Cal Advocates considers overheads already recovered in rates as part of SDG&E's General Rate Case's (GRC's) previous funding levels...."; and please provide copies of the pages of said documents that support each of said facts.

Cal Advocates' Response to Question #3:

Cal Advocates based its recommendation of an adjustment of \$2.071 million in capital overhead costs on SDG&E's testimonies and responses to Cal Advocates' data requests. Cal Advocates asked SDG&E for additional support for its request for recovery of overhead costs as incremental. In Cal Advocates' testimony, from pages 12 to 17, Cal Advocates listed its data request questions and SDG&E's responses that it based its recommendation on.

In SDG&E's responses to PubAdv-SDG&E-CEMA-Audit-SWC-006 and PubAdv-SDG&E-CEMA-Audit-SWC-007, SDG&E did not provide adequate information to substantiate that the overheads requested for the CEMA Events are incremental. Consequently, SDG&E fails to meet its burden to justify the incremental nature of the overhead costs associated with the capital work.

SDG&E's Question #4:

Please identify and list each and every fact support on which the quoted language in bold, above, is premised, regardless of whether said facts appear in an SDG&E GRC; and for each of said facts, please provide the source and page number of said facts and a copy of said page(s).

Cal Advocates' Response to Question #4:

Please see Cal Advocates' responses to Questions #3.

SDG&E's Question #5:

For this question, assume that no SDG&E General Rate Case's previously authorized funding levels included any of the costs contained in SDG&E's Application (A.) 22-10-021. How could SDG&E demonstrate that none of the funding sought in its CEMA application was already recovered in a prior SDG&E General Rate Case?

Cal Advocates' Response to Question #5:

Please see Cal Advocates' response to Question #3.

SDG&E's Question #6:

Please identify with specificity all costs included in SDG&E's A.22-10-021 that were sought for recovery or recovered in a previous SDG&E General Rate Case. For those costs, please provide a citation to and a copy of both the CEMA document and the GRC document in which that same cost appears.

Cal Advocates' Response to Question #6:

Please see Cal Advocates' response to Question #3.

SDG&E's Question #7:

Cal Advocates' Testimony, page 10 (quoted above), states that it "disagrees with SDG&E's rationale...." Please identify and enumerate each of Cal Advocates' disagreements, as referenced in Cal Advocates' Testimony, and the associated reason(s) for its disagreements.

Cal Advocates' Response to Question #7:

Please see Cal Advocates' response to Question #3.