

THE UTILITY REFORM NETWORK
TURN-DR-001
SDG&E 2022 COST OF CAPITAL - A.21-08-013
DATE RECEIVED: NOVEMBER 4, 2021
DATE RESPONDED: NOVEMBER 12, 2021

I. OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent it purports to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.
2. SDG&E objects to the instructions to the extent it instructs to interpret the request for documents "broadly to include any and all hard copy or electronic documents or records in SDG&E's possession" and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects to the instructions to the extent that they require partial responses prior to the date that data requests are due, or the identification of objections before data requests are due.

I. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
 2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
 3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
 4. These responses are made solely for the purpose of this proceeding and for no other purpose.
1. Please send a hard copy of the testimony exhibit(s) to:
 - a. Jennifer Dowdell
2683 Roosevelt Street
Carlsbad, CA 92008
 - b. Marcel Hawiger
2809 Mathews Street
Berkeley, CA 94702

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SDG&E Response 1:

SDG&E sent the requested hard copies of testimony exhibits to the above recipients on November 5, 2021.