

TURN DATA REQUEST-083
SDG&E-SOCALGAS 2019 GRC – A.17-10-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: JULY 12, 2018
DATE RESPONDED: JULY 25, 2018

1. Did SDG&E witness Dane Watson have any direct communication with Matthew Vanderbilt regarding the analysis Mr. Vanderbilt conducted in preparing the SDG&E direct testimony set forth in SDG&E-34-R? If so, please identify and briefly describe each such communication, including but not limited to the date of the communication, and the content of the communication. To the extent any communication occurred through a written document or resulted in delivery of a written document, please provide each such document.

Utility Response 1:

SDG&E objects to the extent that this request is overly broad and unduly burdensome. The burden, expense, and intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, given the timing of the request, the limited time for response, and the opportunity to cross-examine Dane Watson regarding these matters. Notwithstanding these objections, no.

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2. Before preparing SDG&E’s rebuttal testimony, did Dane Watson communicate with SDG&E personnel from its accounting, engineering or operations divisions for purposes of preparing that rebuttal testimony? If so, please identify and briefly describe each such communication, including but not limited to the date of the communication, the identity of the SDG&E personnel who participated, and the content of the communication. To the extent any communication occurred through a written document or resulted in delivery of a written document, please provide each such document.

Utility Response 2:

SDG&E objects that the request is overly broad and unduly burdensome. The burden, expense, and intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, given the timing of the request, the limited time for response, and the opportunity to cross-examine Dane Watson regarding these matters. SDG&E further objects to the extent that the request seeks attorney work-product and/or privileged communications that were in furtherance of litigation or settlement. Notwithstanding these objections, SDG&E responds that Dane Watson did communicate with SDG&E accounting personnel on or around February 2018 through the present. Those communications included discussions regarding Mr. Watson’s possible engagement to prepare SDG&E’s General Rate Case (“GRC”) rebuttal testimony, correspondence providing Mr. Watson Matt Vanderbilt’s direct testimony and workpapers, discussions regarding Mr. Watson’s draft rebuttal, particularly regarding edits to drafts of Mr. Watson’s rebuttal testimony, and possible dates for Mr. Watson’s cross examination appearance. It is not possible to accurately identify each and every communication, particularly given the short time period for response.