**UCAN Data Requests in A.14-11-003**

Date: April 21, 2015

Responses

Due: May 5, 2015

To: SDG&E

John Pacheco

From: UCAN

Don Kelly

3405 Kenyon Street, Suite 401

San Diego, CA 92110

(619) 610-9001

Data Request No: 4

(Please see instructions below)

**INSTRUCTIONS:**

Pursuant to rule 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure UCAN hereby submits this data request for information from SDG&E. If you will be unable to meet the above deadline, or need to discuss the content of this request, please call UCAN counsel at the number(s) shown above before the due date.

If you are unable to provide the information by the due date, have an objection to any request, or plan to assert a privilege to any request, please provide a written explanation to UCAN’s counsel seven calendar days before the due date as to why the response date cannot be met and your best estimate of when the information can be provided.

If you are asserting an objection or privilege please provide the specific nature of that objection or privilege claimed and the facts upon which such claim is based. If any document is redacted, please clearly identify and describe any information that is redacted from the document and provide an explanation for the redaction. Please identify the person who provides the response and his (her) phone number. Provide electronic responses if possible.

If a document is available in Word or Excel format, do not send it as a PDF file. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any number is calculated, include a copy of all electronic files so the formula and their sources can be reviewed.

These data requests shall be deemed continuing in nature so that you shall produce any additional or more current information that come to your attention after your initial responses have been sent up to the time of hearing or settlement.

**Testimony of Katherine Carbon:**

1. Please provide copies of all calculations and workpapers used or prepared by SDG&E and So. Cal. Gas regarding insurance issues in this proceeding.

1. On Page KC-1 Ms. Carbon comments as follows: “With few exceptions, Risk Management procures insurance on a corporate-wide basis for all Sempra business units (regulated and unregulated). This structure provides maximum efficiencies in obtaining insurance, ensures regulatory and legal compliance, and eliminates potential insurance program deficiencies (i.e. gaps and duplication). In her Summary of Requests on Page KC-iii Ms. Carbon observes that an increase of $260,000 is attributed to the “net allocation rate shift, including Multi-Factor allocations. Please provide copies of all calculations and workpapers supporting the rate shift.
2. On Page KC-14, Ms. Carbon makes the following statement with respect to Wildfire Property Damage Reinsurance: “Actual premium expense has been used for 2013 and projected premiums are expected to remain flat.” However, the “Summary of Requests” on Page KC-iii refers to a Liability increase of $6,548,000 “of which $2,158,000 relates to fire insurance.” It would appear that the “fire insurance” reference pertains to Wildfire Property Damage Reinsurance. Please explain the discrepancy between the statement on Page KC-14 and the increase noted on Page KC-iii.