



## **DRA**

*Division of Ratepayer Advocates  
California Public Utilities Commission*

505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-2544  
Fax: (415) 703-2057

<http://dra.ca.gov>

### **DRA DATA REQUEST**

**A.12-04-016**

### **San Diego Gas & Electric Company Cost of Capital Application**

Date: August 30, 2012

To: **Ronald van der Leeden** Phone: (213) 244-2009  
Director of General Rate Cases & Revenue Requirements Email: [RvanderLeeden@semprautilities.com](mailto:RvanderLeeden@semprautilities.com)

**Aimee M. Smith** Phone: (619) 699-5042  
**Laura M. Earl** Email: [amsmith@semprautilities.com](mailto:amsmith@semprautilities.com)  
Attorneys for San Diego Gas & Electric Company Email: [learl@semprautilities.com](mailto:learl@semprautilities.com)

From: **Jerry Oh** Phone: (415) 703-2806  
Project Coordinator Email: [joh@cpuc.ca.gov](mailto:joh@cpuc.ca.gov)

**J. Randall Woolridge, PhD** Phone: (814) 238-9428  
Email: [jrw@psu.edu](mailto:jrw@psu.edu)

**Jonathan Bromson** Phone: (415) 703-2362  
Attorney for DRA Email: [jab@cpuc.ca.gov](mailto:jab@cpuc.ca.gov)

Re: **Data Request No. DRA-SDGE-003**  
**Responses Due: As soon as practicable**

### **INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the DRA contact(s) above with a copy to the DRA attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify DRA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify DRA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

### **DATA REQUESTS**

1. With respect to the rebuttal testimony of Dr. Morin, please provide: (1) copies of all source documents, articles, pages from books, investment reports, credit rating agency reports, regulatory decisions, work papers, and other sources used in the development and preparation of the testimony; and (2) an index with testimony page number, the document that is being provided, the file name of the provided document, and page or tab numbers associated with the materials provided in (1).
2. With reference to page 23, lines 19-23 of Dr. Morin's SDG&E Rebuttal Testimony, please: (1) indicate the presumed growth rate of the U.S. economy, and copies of all studies relied upon to support the presumed growth rate of the U.S. economy; and (2) copies of all empirical studies that demonstrate the relationship between the growth rate of the U.S. economy and the growth rate of dividends and earnings for electric utilities.
3. Please quantify all balancing account disallowances for the past five year, by date, balancing account, recovery amount requested, recovery amount authorized, and recovery amount disallowed.

**END OF REQUEST**