**TURN Data Request #8 to SDG&E**

**I.12-10-013**

*June 13, 2013*

*The following questions relate to the potential for SDG&E to file claims for replacement power costs and other damages due to the SONGS outages with Nuclear Electric Insurance Limited (NEIL), similar to the insurance claims SCE filed with NEIL for replacement power costs.*

*Where reasonably practical, provide all requested workpapers in electronic Excel-compatible format with data and formulae intact and functioning.*

1. State whether SDG&E, directly or indirectly, has entered into any “Accidental Outage Insurance Policy” or similar contract with Nuclear Electric Insurance Limited (NEIL) pursuant to which SDG&E, directly or indirectly, can file a claim to recover replacement power costs or similar damages SDG&E suffered due to the SONGS outages.
2. If the answer to Question (1) is Yes, state whether SDG&E, directly or indirectly, has filed a claim with Nuclear Electric Insurance Limited (NEIL) to recover replacement power costs or similar damages SDG&E suffered due to the SONGS outages.
3. If the answer to Question (2) is Yes:
   1. Provide copies of all documents in which NEIL specifies how claims for replacement power costs or similar damages should be computed, documented and submitted.
   2. Provide all documents SDG&E, directly or indirectly, submitted to NEIL to document SDG&E’s claim for replacement power costs or similar damages and the computations of such claim.
   3. Provide all workpapers, data and other documents SDG&E, directly or indirectly, used to prepare its claim for replacement power costs or similar damages that were not submitted to NEIL in support of SDG&E’s claim.
4. If the answer to Question (1) is No, explain why SDG&E, directly or indirectly, did not enter into any “Accidental Outage Insurance Policy” or similar contract with Nuclear Electric Insurance Limited (NEIL) pursuant to which SDG&E could file a claim to recover replacement power costs or similar damages SDG&E suffered due to the SONGS outages.
5. If the answer to Question (2) is No, state why SDG&E, directly or indirectly, has not filed a claim with Nuclear Electric Insurance Limited (NEIL) to recover replacement power costs or similar damages SDG&E suffered due to the SONGS outages.