

**Cal Advocates DATA REQUEST – SDG&E RESPONSE**  
**Data Request #001**  
**SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001**  
**DATE RECEIVED: September 2, 2021**  
**DATE RESPONDED: September 16, 2021**

**RESPONSE CONTAINS CONFIDENTIAL MATERIALS**

General Objections:

SDG&E objects to the propounding of this data request as improper based on Cal Advocates lack of party status in this matter. Under CPUC Rule of Practice and Procedure 10.1, party status is required to obtain discovery. At the time this data request was made, Cal Advocates had not yet filed a protest or response to this application, filed a motion to become a party, nor has a prehearing conference or hearing occurred wherein Cal Advocates can make an oral motion for party status. Therefore, under CPUC Rule of Practice and Procedure 1.4, Cal Advocates is not a party in this matter.

SDG&E further objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

Question 1:

1. Please provide all confidential and public workpapers supporting SDG&E's 2021 Residential Electrification Rate Application (A.21-09-xxx) in Excel format with all formulas intact.

**SDG&E Response to Question 1:**

Subject to and without waiving the foregoing general objections, SDG&E responds as follows:

Please see the attached documents titled "CONFIDENTIAL - Illustrative Rate Design\_A2109001.xlsx" and "TOU-ELEC Bill Model\_A2109001.xlsx".

"CONFIDENTIAL – Illustrative Rate Design\_A2109001.xlsx" contains nonpublic "protected materials" (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of Decision 06-06-066 and subsequent decisions. The Protected Materials have been highlighted in yellow. The confidentiality declaration of Hannah Campi is also provided.