

Cal Advocates DATA REQUEST – SDG&E RESPONSE

Data Request #007

SDG&E GRC PHASE 2 - A.21-09-001

DATE RECEIVED: February 14, 2022

DATE RESPONDED: March 1, 2022

DATA REQUEST

General Objections:

SDG&E 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).

SUBJECT: UPDATED WORKPAPERS

1. Please provide to Cal Advocates all confidential and public workpapers supporting SDG&E's Rebuttal testimony for SDG&E's 2021 Residential Electrification Application (A.21-09-001), served February 11, 2022, in Excel Format with all formulas and citations intact. This includes all the workpapers for the analysis of customer bill impacts of switching from a natural gas heater to a heat pump water heater.

SDG&E Response:

See attached files titled:

- CalPA_DR_007_Rebuttal Workpaper_Attachment_A_A2109001.xlsx
- CalPA_DR_007_Rebuttal_Table1_A2109001.xlsx