

EPUC DATA REQUEST
EPUC-SDG&E-DR-003
SDG&E 2020 COST OF CAPITAL
DATE RECEIVED: JULY 18, 2019
DATE RESPONDED: JULY 25, 2019

I. GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence, or where the burden, expense, or intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.
9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create

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documents that do not currently exist.

10. SDG&E objects to the production of information that has not been disclosed publicly and that contains highly market-sensitive confidential, proprietary, or trade secret information by reference to statutory protection, such that disclosure of, or reliance upon, this information would create a risk of competitive and financial harm to SDG&E, and where that information is not essential to the determination of this proceeding.

11. SDG&E objects to any request that states that it is ongoing or that requires subsequent, supplemental information.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

III. OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to Instruction D to the extent it purports to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.
2. SDG&E objects to Instructions G and J to the extent it purports to require SDG&E to go beyond what is required by the CPUC's Rules and Practice and Procedure. This instruction is unduly burdensome.
3. SDG&E objects to Instruction L to the extent it purports to require SDG&E to identify information or documents that is not in its possession, custody or control, or to ascertain whether documents have been destroyed in the past, which is unduly burdensome and may be impossible.
4. SDG&E objects to Instruction M to the extent it purports to require SDG&E, with respect to privileged or confidential documents, to go beyond what is necessary to identify the document and its contents for purposes of determining whether a privilege exists.

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IV. OBJECTIONS TO DEFINITIONS

1. SDG&E objects to the definition of “SDG&E” to the extent it purports to require SDG&E to produce documents in the possession, custody or control of “affiliates,” “parents,” “successors,” “predecessors,” or “assigns” or other entities not under the control of SDG&E. Notwithstanding this objection, SDG&E will produce any responsive, nonprivileged information that is in its possession, custody or control.
2. SDG&E objects to the definition of “Communication” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.
3. SDG&E objects to the definition of “Document” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.
4. SDG&E objects to the definition of “Identification” as overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, nonprivileged information that is in its possession, custody or control.
5. SDG&E objects to the definition of “Relate to” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.
6. SDG&E objects to the definition of “Study,” “studies,” “analyses,” and “reports,” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

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- 3-1. Please provide complete copies of all credit reports and publications considered by or relevant to SDG&E and its witnesses issued by Standard & Poor's (S&P), Moody's and Fitch Ratings that have been published since the filing of your Application.
- a. Please provide all subsequent related and relevant credit reports and publications on an ongoing basis.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 6 and 8. Subject to the foregoing objections, SDG&E responds as follows.

SDG&E Response 3-1:

See response (and corresponding attachments) to EPUC-SDG&E-DR-01, Questions 1-2 and 1-10. In addition, see separately attached files. Proprietary, subscription-based materials are provided pursuant to an NDA. Publicly available materials are designated with "(public)" in the filename.

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- 3-2. In an electronic spreadsheet with all formulas intact, please provide a summary of all electric operations-specific revenues, expenses, operating incomes, rate bases and rate of returns requested in the Application.
- a. Please provide all materials referenced in or considered by SDG&E and its witnesses in developing this summary.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, 5, and 6. Subject to the foregoing objections, SDG&E responds as follows.

SDG&E Response 3-2:

SDG&E provided its requested relief in Section VII in its Application. The rate of return requested in this Application is supported in the direct testimony of Bruce Folkmann (Exhibit SDG&E-01) at BAF-2 (*see* Table 1 – Proposed 2020 Authorized Cost of Capital Structure). SDG&E’s files supporting its cost of capital filing were previously provided to EPUC in EPUC-SDG&E-DR-01, Question 1-1. SDG&E is not requesting “all” electric operations-specific revenues, expenses, operating incomes, rate bases, and rate of returns in this Application. The scope of this proceeding is limited to the CPUC jurisdiction for the items listed in Section VII of SDG&E’s Application.

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- 3-3. In an electronic spreadsheet with all formulas intact, please provide a summary of all gas operations-specific revenues, expenses, operating incomes, rate bases and rate of returns requested in the Application.
- a. Please provide all materials referenced in or considered by SDG&E and its witnesses in developing this summary.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, 5, and 6. Subject to the foregoing objections, SDG&E responds as follows.

SDG&E Response 3-3:

SDG&E provided its requested relief in Section VII in its Application. The rate of return requested in this Application is provided in the direct testimony of Bruce Folkmann (Exhibit SDG&E-01) at BAF-2 (*see* Table 1 – Proposed 2020 Authorized Cost of Capital Structure). SDG&E's files supporting its cost of capital filing were previously provided to EPUC in EPUC-SDG&E-DR-01, Question 1-1. SDG&E is not requesting gas operations-specific revenues, expenses, operating incomes, rate bases, and rate of returns in this Application.

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3-4. In an electronic spreadsheet with all formulas intact, please provide a summary of total utility operations revenues, expenses, operating incomes, rate bases and rate of returns requested in the Application.

a. Please provide all materials referenced in or considered by SDG&E and its witnesses in developing this summary.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows.

SDG&E Response 3-4:

SDG&E provided its requested relief in Section VII in its Application. The rate of return requested in this Application is provided in the direct testimony of Bruce Folkmann (Exhibit SDG&E-01) at BAF-2 (*see* Table 1 – Proposed 2020 Authorized Cost of Capital Structure). SDG&E’s files supporting its cost of capital filing were previously provided to EPUC in EPUC-SDG&E-DR-01, Question 1-1. SDG&E is not requesting “total” utility operations revenues, expenses, operating incomes, rate bases, and rate of returns in this Application. The scope of this proceeding is limited to the CPUC jurisdiction for the items listed in Section VII of SDG&E’s Application.