

Dear Mr. Patrick and Ms. Earl:

If it is possible, we would appreciate preliminary responses to the following discovery requests by June 26, 2014. A day before, one of our counsel will be meeting with Frank Urtasun. Comprehensive responses can be provided with twenty (20) days.

1. The pilot program will cost \$103 million, a burden that is shouldered in part by low-income ratepayers who are unlikely to benefit from electric vehicle infrastructure. Please describe any plans SDG&E has to mitigate the cost of the pilot program on low-income ratepayers.
2. Please describe in detail how SDG&E plans to finance the pilot program.
3. Please describe in detail SDG&E's "cost recovery mechanism" for the pilot program.
4. Please provide a list of any internal research conducted by SDG&E, or by SDG&E's consultants, or external research relied on by SDG&E (beyond what is referenced in SDG&E's application or prepared testimony), relating to the present and, separately, future demographics of electric vehicle owners.
5. Please provide any list or research relating to the location and/or use of current electric vehicle charging facilities in the California.
6. Mr. Randy Schimka testified that "67% of SDG&E employees who own or lease an EV said that the presence of workplace charging influenced their EV buying or leasing decision and 79% said the presence of workplace charging will increase their EV miles driven per week." Please provide the individual aggregate compensation and other demographic information for those SDG&E employees who participated in the above survey.
7. Please describe in detail any marketing or outreach that SDG&E has performed or plans to perform to provide electric vehicle charging facilities to low-income and/or minority residential areas.
8. Please provide a list of any internal research conducted by SDG&E, or by SDG&E's consultants, or external research relied on by SDG&E (beyond what is referenced in SDG&E's application or prepared testimony), relating to whether the availability of electric vehicle charging facilities influences low-income and/or customers' attitudes towards purchasing an electric vehicle.
9. Please provide a list of any internal research conducted by SDG&E, or by SDG&E's consultants, or external research relied on by SDG&E (beyond what is referenced in SDG&E's application or prepared testimony), relating to the sufficiency and/or adequacy of existing electric vehicle charging facilities in San Diego.

10. Please describe in detail any decision-making process or criteria for determining what workplaces are selected to participate in the pilot program.
11. Please describe in detail any marketing or outreach that SDG&E has performed or plans to perform to provide electric vehicle charging facilities to workplaces.
12. Please provide information on any relatively comparable programs being considered by any other utilities in California and, separately, any others in the United States.
13. To what degree, if any, has consideration of this program taken into account the potential of hydrogen fuel vehicles, such as the vehicle Toyota has stated it will be selling in California in 2015?
14. Is SDG&E willing to host a meeting with key San Diego community groups that will be joined in by all the major corporate beneficiaries of this electric vehicle program, including the major manufacturers of electric vehicles and the major corporations that have a significant percentage of employees who would benefit from the electric vehicle program?
15. Please describe in detail all efforts by SDG&E to encourage electric vehicle ownership by those earning \$100,000 or less during any time period beginning 2009.

Thank you for your time and attention to this matter.

Sincerely,

/s/ Robert Gnaizda  
General Counsel  
National Asian American Coalition

/s/ Aaron Lewis  
Counsel  
National Asian American Coalition

/s/ Jason Wu  
Legal Extern  
National Asian American Coalition