

**ENERGY PRODUCERS AND USERS COALITION (EPUC) AND INDICATED  
SHIPPERS (IS) DATA REQUEST**

**EPUC/IS-DR-004**

**SDG&E 2022 COST OF CAPITAL - A.21-08-014**

**DATE RECEIVED: JANUARY 20, 2022**

**DATE RESPONDED: JANUARY 25, 2021**

**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.

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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 documents that do not currently exist.
10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order or non-disclosure agreement.
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.

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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.

**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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**Question 5-1:**

Referring to page 7 of SDG&E Compliance Filing issued on November 8, 2021, on electronic spreadsheet with all formulas intact, please provide a breakdown of the estimated retail revenue requirement decrease of \$52.30 million (electric) and the spread of this revenue decrease across all retail rate classes assuming the CCM adjustment is implemented in 2022.

**SDG&E Response 5-1:**

SDG&E objects for the reasons provided in general objection number 6. Notwithstanding and without waiving the objection, SDG&E provided EPUC and Indicated Shippers spreadsheet “EPUC-IS-DR-04\_Revenue Requirement.xlsx” as part of data request set 4 on November 30, 2021. This spreadsheet provides the breakdown of revenue requirement supporting SDG&E’s November 8, 2021 compliance filing providing the revenue requirement impacts of the CCM adjustment mechanism if implemented in 2022. SDG&E is providing that spreadsheet with this data request for convenience. When on the “Summary” tab, the electric-related revenue requirement decrease of \$52.3 million is the summation of Electric Distribution (cell P26), Generation (cell P34), Incremental Projects (Electric Only) (cell P50), and AB 1054 Adjustment (Electric Only) (cell P58). The gas-related revenue requirement of \$10.4 million is provided on the “Summary” tab in the Gas section (cell P42).

The separately attached spreadsheet “EPUC-IS-DR-05\_Electric Rate Tables.xlsx” provides the electric revenue requirement decrease across retail rate classes, as of the time SDG&E prepared its November 8, 2021 compliance filing.

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**Question 5-2:**

Referring to page 7 of SDG&E Compliance Filing issued on November 8, 2021, on electronic spreadsheet with all formulas intact, please provide a breakdown of the estimated retail revenue requirement decrease of \$10.40 million (gas) and the spread of this revenue decrease across all retail rate classes assuming the CCM adjustment is implemented in 2022.

**SDG&E Response 5-2:**

SDG&E objects for the reasons contained in general objection number 6. Notwithstanding and without waiving that objection, please refer to the revenue requirement discussion in provided in Response 5-1 above. The separately attached spreadsheet "EPUC-IS-DR-05\_Gas Rate Tables.xlsx" provides the gas revenue requirement decrease across retail rate classes, as of the time SDG&E prepared its November 8, 2021 compliance filing.

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**Questions 5-3 – 5-5:**

On January 20, 2021, Jonathan Kendrick sent an email on behalf of EPUC/IS that included three bullets as follows:

- In Question 1-1 of EPUC/IS's data requests, EPUC/IS made an ongoing request for copies of all exhibits, tables, figures and supporting workpapers in an electronic spreadsheet with all formulas intact supporting PG&E's filings in this Cost of Capital proceeding. In line with that ongoing request, please provide all such documents supporting PG&E's opening testimony provided on January 18, 2022.
- Additionally, also in line with Question 1-1, please provide the information requested in the attached data request Set 5, which relates to SDG&E's Compliance Filing filed on November 8, 2021.
- In Question 1-4 of EPUC/IS's data requests, EPUC/IS made an ongoing request for copies of all credit reports published by S&P, Moody's and Fitch Ratings within the last two years. As this is an ongoing request, we again request SDG&E provide copies of any such reports published by S&P, Moody's and Fitch Ratings since SDG&E provided its initial response to the first set of data requests.

SDG&E provided an email response from Ross Fulton on January 21, 2021, stating that, consistent with general objection number 11, SDG&E's intent was to treat these questions as part of EPUC's/IS' fifth set of data requests. SDG&E has included each bullet as Questions 5-3, 5-4, and 5-5 below.

**Question 5-3:**

In Question 1-1 of EPUC/IS's data requests, EPUC/IS made an ongoing request for copies of all exhibits, tables, figures and supporting workpapers in an electronic spreadsheet with all formulas intact supporting PG&E's filings in this Cost of Capital proceeding. In line with that ongoing request, please provide all such documents supporting PG&E's opening testimony provided on January 18, 2022.

**SDG&E Response 5-3:**

SDG&E assumes that the question meant to ask for copies of all exhibits, tables, figures and supporting workpapers in an electronic spreadsheet with all formulas intact supporting **SDG&E's** filings in this Cost of Capital Proceeding." Consistent with the Commission's December 24, 2021 Scoping Memo in this proceeding, SDG&E did not include technical analysis involving formulas in its January 18, 2022 Opening Testimony. SDG&E is providing a spreadsheet "EPUC-IS-DR-05\_Question 5-3.xlsx" of the representative "Utility Peer Group" discussed in James Coyne's opening testimony (Exhibit SDG&E-07) specifically in footnote 17. Mr. Coyne's selected Utility Peer Group includes companies that possess a set of business and operating characteristics similar to SDG&E's electric and gas utility operations.

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**SDG&E Response 5-Continued:**

This Utility Peer Group contains the same companies that were included in Mr. Coyne's proxy group in his Direct Testimony, submitted in August 2021 (SDG&E-04). The spreadsheet includes the individual companies and their Beta coefficients that were used to calculate the summary statistics in Figure 4 in Mr. Coyne's opening testimony. SDG&E is further including as Excel files the underlying data supporting Figures 1-7 in Mr. Coyne's opening testimony.

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**Question 5-4:**

Additionally, also in line with Question 1-1, please provide the information requested in the attached data request Set 5, which relates to SDG&E's Compliance Filing filed on November 8, 2021.

**SDG&E Response 5-4:**

Separately attached are SDG&E's Appendices A and B in Excel format to SDG&E's November 8, 2021 compliance filing.



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**Question 5-5:**

In Question 1-4 of EPUC/IS's data requests, EPUC/IS made an ongoing request for copies of all credit reports published by S&P, Moody's and Fitch Ratings within the last two years. As this is an ongoing request, we again request SDG&E provide copies of any such reports published by S&P, Moody's and Fitch Ratings since SDG&E provided its initial response to the first set of data requests.

**SDG&E Response 5-5:**

SDG&E is not aware of new or additional credit reports published by S&P, Moody's, or Fitch's Ratings related to SDG&E since SDG&E responded to Question 1-4. In other words, EPUC/IS should have all credit reports from those three credit rating agencies regarding SDG&E from the last two years.