

SIERRA CLUB DATA REQUEST – SDG&E RESPONSE
Data Request #02
SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001
DATE RECEIVED: October 28, 2021
DATE RESPONDED: November 1, 2021

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).

1. Please provide all data request responses SDG&E has provided to date in response to data requests from other parties in this proceeding. Please consider this request as ongoing. To the extent any data request responses are confidential, please provide Earthjustice with an NDA to execute to allow Earthjustice to receive this information.

SDG&E Response:

OBJECTION: SDG&E objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents in existence at the time of its response. Should SDCP seek to update its request, SDG&E will respond to such a request as a new data request in the future. Subject to and without waiving the foregoing objections, SDG&E provides existing responsive documents as attachments below.

All public data request responses that SDG&E has provided to parties to date can be found at the web address below. Confidential responses to past data requests are attached to this email.

<https://www.sdge.com/rates-and-regulations/proceedings/Application-for-a-Residential-Untiered-Time-of-Use-Rate-with-a-Fixed-Charge>