(A.15-07-014)

(DATA REQUEST TURN-SEU-04)

QUESTION 1:

The response to question 10 of TURN's first set of data requests consisted of a document with the heading "Proposal to introduce a residential customer charge for SDG&E and increasing the residential customer charge for SoCalGas."

- a) Please confirm that this is the only document that is responsive to question 10 of TURN's first set of data requests. If there are any other documents that are responsive, please provide them at this time.
- b) When was the provided document prepared? On what date was it finalized or completed?
- c) The provided document concludes with tables showing residential customer charge proposals that start at a lower level in 2017, increase in 2018 and 2019, and then are subject to CPI adjustment in 2020 and going forward.
 - i) When did the Sempra Utilities decide to include a different proposal in its TCAP testimony?
 - ii) Please identify each person who was involved in recommending and approving going forward with a different proposal in the TCAP testimony than the proposal set forth in the provided document.
 - iii) Please provide all documents associated with the decision to make the TCAP proposal different than the proposal set forth in the provided document.

(A.15-07-014)

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RESPONSE 1:

- a) This is the only known document.
- b) The document was completed around May 5, 2015.

c)

- i. Sometime between the documents completion around May 5, 2015, and the steering committee presentation on June 11, 2015.
- ii. SoCalGas and SDG&E object to this question on the grounds that it is overbroad and seeks irrelevant information. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows: Please see our response to TURN DR 1-16.
- iii. SoCalGas and SDG&E are not aware of any responsive documents.

(A.15-07-014)

(DATA REQUEST TURN-SEU-04)

QUESTION 2:

Please provide a copy of all e-mails, memoranda, or other documents prepared by or on behalf of SoCalGas or SDG&E regarding the proposed residential customer charges included in the Phase 2 TCAP application (A.15-07-014).

RESPONSE 2:

SoCalGas and SDG&E object to this question on the grounds that it is overbroad and seeks irrelevant information. SoCalGas and SDG&E also object to this question to the extent that it requests information protected by the attorney/client privilege or the attorney work product doctrine. No information protected by this privilege or doctrine will be knowingly disclosed. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows: Please see the memoranda and documents we provided in response to TURN DR 1-10.

(A.15-07-014)

(DATA REQUEST TURN-SEU-04)

QUESTION 3:

The response to question 16 of TURN's first set of data requests states that Mr. Bonnett made the proposal for the residential customer charges in this proceeding, and the proposal was approved by a TCAP steering committee that includes SoCalGas and SDG&E officers.

- a) Please provide a copy of all materials provided to the TCAP steering committee prior to the filing of the Phase 2 TCAP application (A.15-07-014).
- b) Please provide a copy of all materials relating to the residential customer charge proposal that were provided to any member of the TCAP steering committee prior to the committee's approval of the residential customer charge proposal.
- c) Please identify the date on which Mr. Bonnett made the residential customer charge proposal to the TCAP steering committee.
- d) Please identify the date on which the TCAP steering committee approved the residential customer charge proposal.

RESPONSE 3:

SoCalGas and SDG&E object to this question on the grounds that it is overbroad and seeks irrelevant information. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows: Please see the attached portions of a 6/11/15 steering committee presentation that discuss the residential customer charge proposal.

