

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)**

(21st DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: May 23, 2017

Date Responded: June 7, 2017

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas do not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
6. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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GENERAL OBJECTIONS

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for SCGC as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of SCGC's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

QUESTION 1:

**SAN DIEGO GAS & ELECTRIC COMPANY
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Regarding Jason Bonnett’s testimony at page 3, Table 1, which presents “Illustrative BTS Revenue Requirement and Rate Impacts,” assuming the Applicants’ proposed pipeline safety and reliability projects are completed. Please present Table 1 under the hypothetical situation where the Applicants’ proposed pipeline safety and reliability projects are completed but where the Backbone System revenue requirement is not subject to System Integration so that SoCalGas’ Backbone System revenue requirement is segregated from SDG&E’s Backbone System revenue requirement. Please show the Backbone System revenue requirement separately for the two companies.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to this question on the grounds that the hypothetical (“where the Backbone System revenue requirement is not subject to System Integration so that SoCalGas’ Backbone System revenue requirement is segregated from SDG&E’s Backbone System revenue requirement”) is contrary to the Commission’s prior Decision, and thus is not relevant to any issue in this proceeding and thus unduly burdensome. Further, even assuming limited relevance to this proceeding, it is not relevant to Phase I and thus is beyond the scope of permissible discovery at this time.

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QUESTION 2:

Regarding Jason Bonnett's testimony at page 4, Table 2, which presents "Illustrative Bundled Rate Impacts," assuming the Applicants' proposed pipeline safety and reliability projects are completed. Please present Table 2 under the hypothetical situation where the Applicants' proposed pipeline safety and reliability projects are completed but where the Backbone System is not subject to System Integration so that SoCalGas' Backbone System revenue requirement is segregated from SDG&E's Backbone System revenue requirement.

RESPONSE 2:

Please see the response to Question 1 above.

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QUESTION 3:

Regarding Jason Bonnett's testimony at page 6, Table 3, which presents "Class Average Rates," assuming the Applicants' proposed pipeline safety and reliability projects are completed. Please present Table 3 under the hypothetical situation where the Applicants' proposed pipeline safety and reliability projects are completed but where the Backbone System is not subject to System Integration so that SoCalGas' Backbone System revenue requirement is segregated from SDG&E's Backbone System revenue requirement.

RESPONSE 3:

Please see the response to Question 1 above.

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QUESTION 4:

Regarding Jason Bonnett's testimony at page 7, Table 4, which presents "Illustrative Bundled Rate Impacts," assuming the Applicants' proposed pipeline safety and reliability projects are completed. Please present Table 4 under the hypothetical situation where the Applicants' proposed pipeline safety and reliability projects are completed but where the Backbone System is not subject to System Integration so that SoCalGas' Backbone System revenue requirement is segregated from SDG&E's Backbone System revenue requirement.

RESPONSE 4:

Please see the response to Question 1 above.

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QUESTION 5:

Please provide a complete set of workpapers to the calculations made in responding to Questions 21.1, 21.2, 21.3, and 21.4 in the form of fully functional Excel workbooks with all data, formulas, and links intact.

RESPONSE 5:

Please see the response to Question 1 above.