

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2016, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2016 and (iii) Costs Recorded in Related Regulatory Accounts in 2016

Application 17-06-006
(Filed June 1, 2017)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO OFFER
PREPARED TESTIMONY, APPENDICES, AND AN EXHIBIT INTO EVIDENCE**

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July 27, 2018

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2016, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2016 and (iii) Costs Recorded in Related Regulatory Accounts in 2016

Application A.17-06-006
(Filed June 1, 2017)

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Pursuant to Rules 11.1 and 13.8 of the Rules of Practice and Procedure (Rules) of the California Public Utilities Commission (Commission), and Administrative Law Judge (ALJ) Kelly A. Hymes' July 20, 2018 email to parties in the above-captioned proceeding, San Diego Gas & Electric Company (SDG&E) respectfully files this Motion to Offer Prepared Testimony, Appendices, and an Exhibit into Evidence (Motion). Concurrently with this Motion, SDG&E is filing a Motion to Seal (Motion to Seal) a Portion of the Evidentiary Record under Rule 11.5(b). SDG&E's Motion to Seal requests that the confidential versions of SDG&E's testimony and revised appendices be filed under seal in this proceeding. On July 27, 2018, ALJ Hymes authorized SDG&E and the Commission's Office of Ratepayer Advocates to submit individual motions rather than a "joint motion" seeking admission into the record of their respective documents.

SDG&E hereby moves that the Commission receive the following prepared testimony, inclusive of any attachments and appendices,¹ and an exhibit into evidence in this proceeding:

1. The public versions of five documents, together with their appendices, served on June 1, 2017, inclusive of public versions of the direct testimonies of Ana Garza-Beutz (Exhibit 1), Sheri S. Miller (Exhibit 2), Joseph Pasquito (Exhibit 3), Daniel L. Sullivan (Exhibit 4), and Carl S. LaPeter (Exhibit 5).²
2. The confidential versions of four documents, together with their appendices and associated confidentiality declaration, served on June 1, 2017, inclusive of confidential versions of the direct testimonies of Ana Garza-Beutz (Exhibit 1-C), Sheri S. Miller (Exhibit 2-C), Joseph Pasquito (Exhibit 3-C), and Daniel L. Sullivan (Exhibits 4-C). SDG&E has moved that the shaded portions of confidential Exhibits 1-C, 2-C, 3-C, and 4-C be sealed, as more fully described in SDG&E's Motion to Seal.
3. The public version of the revised direct testimony of Joseph Pasquito, specifically, pages JP-27 and JP-30, served on September 8, 2017 (Exhibit 6).³
4. The confidential version of the revised Attachment A – 2016 Summary Load and LMP price forecasts of Joseph Pasquito's direct testimony, served on September 8, 2017 (Exhibit 7-C).

¹ Out of an abundance of caution, and as specified in Rule 13.8 of the previous version of the Rules (but not in the current version), SDG&E also includes Declarations for each of the witnesses for whom testimony is moved for submission into evidence.

² The prepared direct testimony of Carl S. LaPeter is public in its entirety, whereas the testimonies of the other four witnesses have both confidential and public versions.

³ The revised pages, JP-27 and JP-30, of Joseph Pasquito's prepared direct testimony are public in their entirety.

5. The confidential version of the revised Attachment B – 2016 Hydro and Pump Storage of Joseph Pasquito’s direct testimony, served on September 8, 2017 (Exhibit 8-C).
6. The confidential version of the revised Attachment G – 2016 ERRA Comp – LCD Workpapers of Joseph Pasquito’s direct testimony, served on September 8, 2017 (Exhibit 9-C).⁴
7. The public versions of five documents containing SDG&E’s prepared rebuttal testimony, together with their appendices, served on October 24, 2017 as follows: Monica Chihwaro (Exhibit 10), Ana Garza-Beutz (Exhibit 11), Carl S. LaPeter (Exhibit 12), Joseph Pasquito (Exhibit 13), and Daniel L. Sullivan (Exhibit 14).⁵
8. The confidential versions of three documents containing SDG&E’s prepared rebuttal testimony, together with their appendices and associated confidentiality declaration, submitted on October 24, 2017 as follows: Ana Garza-Beutz (Exhibit 11-C) and Joseph Pasquito (Exhibit 13-C). SDG&E has moved that the shaded portions of confidential exhibits 11-C and 13-C be sealed, as more fully described in SDG&E’s accompanying Motion to Seal.

⁴ Exhibits 7-C, 8-C, and 9-C are entirely confidential, therefore public versions are not available.

⁵ The prepared rebuttal testimonies of Monica Chihwaro, Daniel L. Sullivan, and Carl S. LaPeter are public in their entirety, whereas the testimonies of the other two witnesses have both confidential and public versions.

9. The first set of data requests by SDG&E propounded to Office of Ratepayer Advocates (ORA), dated November 6, 2017, and the responses by ORA to SDG&E's first set of data requests, submitted on December 15, 2017 (Exhibit 15).⁶

Respectfully submitted,

By: /s/ Paul A. Szymanski
Paul A. Szymanski

Attorney for:
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E-mail: pszymanski@semprautilities.com

DATED at San Diego, California, this 27th day of July 2018.

⁶ This document has not previously been served on the service list, and therefore it is included as Attachment 1 to this Motion.

DECLARATIONS

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2016, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2016 and (iii) Costs Recorded in Related Regulatory Accounts in 2016

Application A.17-06-006
(Filed June 1, 2017)

**DECLARATION OF MONICA CHIHWARO IN SUPPORT OF PREPARED
REBUTTAL TESTIMONY**

I, Monica Chihwaro, do hereby declare and affirm that I sponsor the portions of Exhibit 10, entitled “Prepared Rebuttal Testimony of Monica Chihwaro.” Exhibit 10 was prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Monica Chihwaro whose witness qualifications are set forth in Exhibit 10. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Monica Chihwaro
Monica Chihwaro

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Application A.17-06-006
(Filed June 1, 2017)

**DECLARATION OF ANA GARZA-BEUTZ IN SUPPORT OF PREPARED DIRECT
AND REBUTTAL TESTIMONY**

I, Ana Garza-Beutz, do hereby declare and affirm that I sponsor the portions of Exhibits 1 and 1-C, entitled “Prepared Direct Testimony of Ana Garza-Beutz,” and Exhibits 11 and 11-C, entitled “Prepared Rebuttal Testimony of Ana Garza-Beutz.” Exhibits 1 and 1-C and Exhibits 11 and 11-C were prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Ana Garza-Beutz whose witness qualifications are set forth in Exhibits 1 and 1-C. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Ana Garza-Beutz
Ana Garza-Beutz

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application A.17-06-006
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**DECLARATION OF CARL S. LAPETER IN SUPPORT OF PREPARED DIRECT AND
REBUTTAL TESTIMONY**

I, Carl S. LaPeter, do hereby declare and affirm that I sponsor the portions of Exhibit 5, entitled “Prepared Direct Testimony of Carl S. LaPeter,” and Exhibit 12, entitled “Prepared Rebuttal Testimony of Carl S. LaPeter.” Exhibit 5 and Exhibit 12 were prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Carl S. LaPeter whose witness qualifications are set forth in Exhibit 5. My qualifications to offer this testimony are set forth in that exhibit.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Carl S. LaPeter
Carl S. LaPeter

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application A.17-06-006
(Filed June 1, 2017)

**DECLARATION OF SHERI S. MILLER IN SUPPORT OF PREPARED DIRECT
TESTIMONY**

I, Sheri S. Miller, do hereby declare and affirm that I sponsor the portions of Exhibits 2 and 2-C, entitled “Prepared Direct Testimony of Sheri S. Miller.” Exhibits 2 and 2-C were prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Sheri S. Miller whose witness qualifications are set forth in Exhibits 2 and 2-C. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Sheri S. Miller
Sheri S. Miller

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application A.17-06-006
(Filed June 1, 2017)

**DECLARATION OF JOSEPH PASQUITO IN SUPPORT OF PREPARED DIRECT AND
REBUTTAL TESTIMONY AND REVISED TESTIMONY/ATTACHMENTS**

I, Joseph Pasquito, do hereby declare and affirm that I sponsor the portions of Exhibits 3 and 3-C, entitled “Prepared Direct Testimony of Joseph Pasquito,” Exhibit 6, entitled “Revised Direct Testimony of Joseph Pasquito pages JP-27 and JP-30,” Exhibit 7-C, entitled “Revised Attachment A – 2016 Summary Load and LMP price forecasts,” Exhibit 8-C, entitled “Revised Attachment B – 2016 Hydro and Pump Storage,” Exhibits 9-C, entitled “Revised Attachment G – 2016 ERRRA Comp – LCD Workpapers,” and Exhibits 13 and 13-C, entitled “Prepared Rebuttal Testimony of Joseph Pasquito.” Exhibits 3 and 3-C, Exhibit 6, Exhibit 7-C, Exhibit 8-C, Exhibit 9-C, and Exhibits 13 and 13-C were prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Joseph Pasquito whose witness qualifications are set forth in Exhibits 3 and 3-C. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Joseph Pasquito
Joseph Pasquito

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2016, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2016 and (iii) Costs Recorded in Related Regulatory Accounts in 2016

Application A.17-06-006
(Filed June 1, 2017)

**DECLARATION OF DANIEL L. SULLIVAN IN SUPPORT OF PREPARED DIRECT
AND REBUTTAL TESTIMONY**

I, Daniel L. Sullivan, do hereby declare and affirm that I sponsor the portions of Exhibits 4 and 4-C, entitled “Prepared Direct Testimony of Daniel L. Sullivan,” and Exhibit 14, entitled “Prepared Rebuttal Testimony of Daniel L. Sullivan.” Exhibits 4 and 4-C and Exhibit 14 were prepared by me or under my supervision, the facts stated therein are true and correct to the best of my knowledge and belief, and insofar as said material is in the nature of opinion or judgment, it represents my best judgment. I am the same Daniel L. Sullivan whose witness qualifications are set forth in Exhibits 4 and 4-C. My qualifications to offer this testimony are set forth in those exhibits.

Sworn to under penalty of perjury this 27th day of July 2018, at San Diego, California.

/s/ Daniel L. Sullivan
Daniel L. Sullivan

Attachment 1

Exhibit 15

SDG&E Data Request #1 to ORA

Date sent: November 6, 2017

Date Responded: December 15, 2017

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of San Diego Gas & Electric Company (U902E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2016, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account and Transition Cost Balancing Account in 2016 and (iii) Costs Recorded in Related Regulatory Accounts in 2016.

A.17-06-006

**FIRST SET OF DATA REQUESTS BY
SAN DIEGO GAS & ELECTRIC COMPANY TO
OFFICE OF RATEPAYER ADVOCATES**

PAUL A. SZYMANSKI
Senior Counsel
SAN DIEGO GAS & ELECTRIC
COMPANY

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November 6, 2017

San Diego Gas and Electric Company (“SDG&E”) hereby requests that Office of Ratepayer Advocates (“ORA”) provide the information and produce and serve upon SDG&E the written responses to the information and documents requested below no later than November 20, 2017 to Paul Szymanski (pszymanski@semprautilities.com) and Stacie Atkinson (satkinson@semprautilities.com).

**I.
INSTRUCTIONS**

1. Please provide responses to all questions as they become available, with full responses delivered by November 20, 2017.
2. Please provide all relevant and responsive information available in response to each data request. Such information shall include, but not be limited to, all oral and written communications, documents, maps, pictures and drawings received, reviewed, used or considered by each person identified in ORA’s responses. All information referenced in each response must be provided as an attachment to that response and be clearly identified to indicate to which respondent (if there are multiple respondents to a specific data request or sub-section of that data request) received, viewed, used or considered each piece of information and which piece of information is being referenced in each respondents’ response.
3. Please identify the person(s) responding to the data request on the response.
4. For each data request, please identify each ORA employee consulted in formulating answers to the data request.
5. For each data request, please identify all documents referenced in responding to these data requests.
6. Please start the response to each question on a new page.
7. Please include a copy of the question that the response addresses as well as the response to the question.
8. Please provide responses in electronic format. If a file cannot be transmitted by email, please send via CPUC FTP.
9. For responses that consist of numerical data, please provide the data in a form readable by Microsoft Office Excel 2007 for Windows.
10. If the response consists of spreadsheets, please assure that all formulae in the spreadsheets are intact.
11. Please mark “Confidential” any information in the data request responses that ORA considers to be confidential.

12. Please provide the responses to questions as they become available, rather than waiting until all responses can be sent.

13. If any of the information sought in a data request will not be available by the response date for that request, please state the projected date on which such information will become available and the reason(s) for delay.

14. Please make all objections in writing and forward them to Paul A. Szymanski no later than November 9, 2017. In that event, please provide 3 dates and times when ORA will be able to meet and confer to attempt to resolve the objection.

II. DATA REQUESTS

* Per confirmation by SDG&E Attorney Paul Szymanski via the December 1, 2017 3:05 pm email, the due date for responses to this data request is December 15, 2017. As such, ORA submits the responses on December 15, 2017.

DATA REQUEST NO. 1: [Provided by ORA witnesses Mea Halperin, Patrick Cunningham, and Ayat Osman]

Please provide electronic copies all data request and responses submitted by each party in A.17-02-005 and A.17-04-004 related to the topics of Least-cost Dispatch (LCD), Demand Response (DR), Greenhouse Gas (GHG), and Contract Administration (CA).

Objection: Question is burdensome, vague, and not formulated to discover relevant information as there are over a thousand pages of data request responses, including material from other utilities marked as confidential that ORA cannot disclose.

Response:

To the extent any material is relevant to A.17-06-006, ORA is providing data request questions and responses in reference to occasions in which ORA directly compared SDG&E to SCE and/or PG&E. The only occasion in which this occurred in Chapter 2 is on page 2-23, line 16, regarding hydro modeling. Attached please find two data requests that ORA submitted to PG&E in reference to its hydro reporting. ORA did not submit data requests to SCE about its hydro modeling.

ORA is providing responses that are either redacted or not marked confidential. If SDG&E is interested in material that is marked confidential, then SDG&E should contact the other utilities directly.

Neither in the GHG nor in the Contract Administration chapters does ORA make specific reference to PG&E nor SCE so no data requests about these topics are attached.

DATA REQUEST NO. 2: [Provided by Mea Halperin]

Please provide electronic copies of the testimonies and briefs that ORA submitted in the Record Year 2014 and 2015 ERRA Compliance proceedings for Pacific Gas and Electric Company (PG&E) and Southern California Edison (SCE).

Objection: The question is vague and not formulated to discover relevant information concerning specific topics in A.17-06-006. The purpose of discovery is to identify material that is not publically available. This question is burdensome in that it seeks information that is publically available.

Response: As a courtesy, the documents are available at www.cpuc.ca.gov at the following links:

- PG&E 2014 ERRA Compliance Proceeding, A.15-02-023:
https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:A1502023
- PG&E 2015 ERRA Compliance Proceeding, A.16-02-019:
https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:A1602019
- SCE 2014 ERRA Compliance Proceeding, A.15-04-002:
https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:A1504002
- SCE 2015 ERRA Compliance Proceeding, A.16-04-002:
https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:A1604001-

DATA REQUEST NO. 3: [Provided by Ayat Osman]

Please provide the dates of all meetings and telephone communications between ORA and PG&E and between ORA and SCE during calendar year 2017 on any matter related to the GHG-related issues in the scope of A.17-02-005 and A.17-04-004.

Objection: Question is not formulated to discover relevant information as the dates of meetings and telephone communications with other utilities are not related to SDG&E's greenhouse gas costs in this ERRA compliance proceeding.

Response: In ORA's testimony, Chapter 4-GHG Compliance Instruments and Costs, ORA did not compare SDG&E to any other utilities.

DATA REQUEST NO. 4: [Provided by Mea Halperin]

Please provide all emails, workpapers and calculations to explain the quantitative, factual basis for ORA's "maximum disallowance" recommendation appearing in ORA's September 28, 2017 Testimony in this proceeding.¹ Please indicate the dates and authors of all such documents.

Objection: Vague and overbroad. Emails discussing internal evaluations and analysis as part of litigation strategy are privileged. Workpapers and calculations relevant to ORA's disallowance recommendation are already part of the testimony.

Response: Despite the vague question, to the extent ORA understands the question to ask what is the quantitative and factual basis of ORA's "maximum disallowance" recommendation, please see ORA testimony pages 2-1 through 2-5.

¹ All page references herein not otherwise specified are to this document.

DATA REQUEST NO. 5: [Provided by Mea Halperin]

In regard to ORA's "maximum disallowance" recommendation, please identify each fact for each category below that, in ORA's opinion, substantiates of the amount of recommended disallowance, associated with

- a) price forecasting;
- b) demand forecasting;
- c) management of thermal resources;
- d) management of hydro resources;
- e) demand response; and
- f) any other category not identified above.

Objection: Question is not formulated to discover new information not already in the record.

Response:

Answers to the questions are available at ORA testimony on the following pages:

- a) price forecasting; pages 2-10 – 2-11.
- b) demand forecasting; page 2-12.
- c) management of thermal resources; pages 2-13 through 2-17.
- d) management of hydro resources; pages 2-17 through 2-23.
- e) demand response; pages 2-26 through 2-30.

DATA REQUEST NO. 6: [Provided by Mea Halperin]

Please identify all individuals at ORA who approved ORA's "maximum disallowance" recommendation as it appeared in ORA's September 28, 2017 Testimony. Please provide all documents regarding said approvals.

Objection: Question is not formulated to discover relevant material. Beyond the identity of the witnesses in this case, the identity of other ORA staff is not relevant to the issues of this proceeding.

Response: Notwithstanding the objection and as a courtesy, ORA responds that the management structure of ORA is public knowledge. ORA has a structure that provides for director approval of all policies and decisions.

DATA REQUEST NO. 7: [Provided by Mea Halperin]

ORA's Testimony at page 2-1 claims that "SDG&E's ERRRA Compliance LCD showing for the 2016 Record Period fails to give ORA adequate information with which to assess whether SDG&E has met its burden of proof" (hereafter, "assertion"). Please list and explain in detail, for each and every instance of this assertion, and for each instance, specify exactly (a) where in SDG&E's LCD showing, inclusive of SDG&E's testimony, workpapers, and responses to ORA's data requests, SDG&E's showing is "inadequate;" (b) why that showing is inadequate in ORA's opinion; and (c) exactly what information that, in ORA's opinion, SDG&E should have provided that would render that showing "adequate."

Objection: Question is redundant as ORA's testimony already provided all of ORA's analysis, facts, and conclusions.

Response: Notwithstanding the objection, support for the above referenced statement is at ORA testimony, p. 2-1 – 2-5, 2-9 – 2-10, 2-12, 2-13, 2-15, 2-16 – 2-17, 2-23, 2-27 – 2-29. Please see attached data requests where SDG&E failed to respond clearly and comprehensively.

DATA REQUEST NO. 8: [Provided by Mea Halperin]

For each instance noted above in question 3, please specify the Commission Order, with page numbers, that directs SDG&E to provide that information that ORA claims SDG&E should have provided.

Objection: Commission orders are equally available to SDG&E as they are to ORA. Question is redundant as ORA already provided relevant citations in its testimony. It is unclear if this question is referring to question 3 or question 7.

Response: To the extent Question 8 is referring to Question 7, please see response to question 7 where ORA attached data requests where SDG&E failed to respond clearly and comprehensively.

DATA REQUEST NO. 9: [Provided by Mea Halperin]

For each instance noted above in question 3, please indicate whether ORA requested that information in a data request to SDG&E, and if so, for each instance provide the data request and SDG&E's response, and further specify in detail in what regard SDG&E did not provide the requested information.

Objection: It is unclear if this question is referring to question 3 or question 7.

Response: To the extent Question 9 is referring to Question 7, please see response to question 7 where ORA attached data requests where SDG&E failed to respond clearly and comprehensively.

SDG&E requested a compressed testimony schedule at the August 1, 2017 prehearing conference. According to the August 18 scoping memo, ORA had to meet the September 28 due date for ORA testimony. There was no additional time for ORA to ask the same questions repeatedly as SDG&E has a responsibility to provide complete, meaningful, and coherent answers to any and all data requests.

DATA REQUEST NO. 10: [Provided by Mea Halperin and Patrick Cunningham]

ORA's Testimony at page 2-2 through 2-3 asserts: "...ORA sent SDG&E requests not only for additional information regarding its LCD activities but to further clarify errors, omissions, undefined acronyms, un-labeled numerical units, and unreferenced data. After these requests, SDG&E provided some additional information, but the data remained insufficient and difficult to analyze due to a lack of detail and reference." With respect to this statement, please provide the reference to the ORA data request regarding the item at issue, and please:

- a) List all referenced "errors" with reference to SDG&E's documents submitted to ORA and explain in detail why that the matter is in error.
- b) List all referenced "omissions" with reference to SDG&E's documents submitted to ORA and explain in detail what requirement rendered the absence of the information provided to be an "omission."
- c) List all "unidentified acronyms" in SDG&E's documents and the steps ORA took, if any, to seek to have SDG&E explain the acronym that was allegedly omitted.
- d) List all "un-labeled numerical units" in SDG&E's documents and the steps ORA took, if any, to seek to have SDG&E explain the acronym that was allegedly "un-labeled."
- e) List all instances in which ORA claims, after an ORA data request, that "the data remained insufficient and difficult to analyze due to a lack of detail and reference." Please identify with specificity, with complete page references, the steps, if any, ORA took to explain or identify to SDG&E the "data" referenced in this statement.

Objection to Question 10: Question is redundant as ORA provided its reasons in its testimony.

Objection to Question 10c and 10d: The number of instances and or steps "ORA took to explain or identify to SDG&E" the problem is not relevant because SDG&E is required to answer the data requests completely and coherently. Further, SDG&E requested a compressed testimony schedule at the August 1, 2017 prehearing conference. According to the August 18 scoping memo, ORA had to meet the September 28 due date for ORA testimony. There was no additional time for ORA to ask the same questions repeatedly as SDG&E has a responsibility to provide complete, meaningful, and coherent answers to any and all data requests.

Response: See responses to Question 7 and Question 9.

DATA REQUEST NO. 11: [Provided by Mea Halperin]

On page 2-2, ORA claims that "...SDG&E did not provide enough historical data or context to allow ORA to determine whether SDG&E met the reasonable manager standard for forecast accuracy." With respect to this statement, please:

- a) Indicate exactly what "historical data" ORA claims was insufficient, and provide a full citation to the Commission decision and directive that requires SDG&E to provide it. Also, please indicate in which data request ORA requested "historical data" that SDG&E alleged did not provide "sufficiently."
- b) Indicate exactly what the term "context" means in the above statement, and provide a citation to the Commission decision and directive that requires SDG&E to provide said "context." Also, please indicate in which data request ORA requested "context" that SDG&E allegedly did not provide "sufficiently."
- c) Indicate by Commission Decision number and directive where the Commission has indicated that the "reasonable manager standard" applies to "forecast accuracy" and indicate, with reference to examples from other Commission proceedings, how the Commission analyzes "forecast accuracy"

Objection: Assumes facts not in evidence and mischaracterizes ORA testimony.

Response: Notwithstanding the objection, ORA's testimony explaining its position in full is at p. 2-9, lines 15-19 and p. 2-10, lines 2-18.

DATA REQUEST NO. 12: [Provided by Mea Halperin]

On page 2-9, ORA states that “ORA assessed SDG&E’s day-ahead forecast accuracy by comparing the load and price forecasts with the actual CAISO load and clearing price to get the average mean absolute percentage error (MAPE).” With respect to this statement:

- a) Please identify all ERRA Compliance proceedings by SDG&E, SCE, and PG&E in which ORA conducted a MAPE analysis, with page citations said analysis.

Objection: Question is overly burdensome and not formulated to discover relevant information as material from ERRA compliance proceedings are publically available to the extent the material is not confidential. ORA cannot provide material marked as confidential.

- b) Please identify all Commission Orders that required the use of ORA’s MAPE analysis to assess day-ahead forecast accuracy.

Objection: Discovery is appropriate if information is held by the respondent only. This question requests information equally available to SDG&E and ORA.

- c) Please provide a detailed explanation as to why ORA appears to contend that the MAPE analysis provides a better measure for forecasting accuracy than the absolute value of the nominal difference?

Objection: Question is redundant. ORA already provided its position in its testimony.

Response: Please see ORA testimony at p. 2-9 – 2-10.

DATA REQUEST NO. 13: [Provided by Mea Halperin]

On page 2-2, ORA claims that "... ORA is also unable to verify [SDG&E's] business practices to determine whether the errors and omissions reveal failures in SDG&E's overall LCD reporting system." With respect to this statement:

- a) Please list each "business practice" referenced in this statement, with citations to SDG&E's submissions;
- b) Please explain, for each "business practice" referenced above, what specific tasks ORA does to "verify" it;
- c) Please explain in detail, for each "business practice" referenced above, why ORA was "unable" to "verify" it and what SDG&E should have done, in ORA's opinion, so that ORA could "verify" it;
- d) Please identify each and every "error" and "omission," with citations to SDG&E's showing, and explain for each said "error" and "omission" why it caused ORA to be unable to "verify" and "business practice."

Objection: Question mischaracterizes ORA testimony, assumes facts not in the record, and is redundant of material already provided in ORA testimony.

Response: Notwithstanding the objection, ORA discusses this issue in ORA testimony, p. 2-11, lines 9-18.

Further, SDG&E requested a compressed testimony schedule at the August 1, 2017 prehearing conference. According to the August 18 scoping memo, ORA had to meet the September 28 due date for ORA testimony. There was no additional time for ORA to ask the same questions repeatedly as SDG&E has a responsibility to provide complete, meaningful, and coherent answers to any and all data requests.

See also responses to Question 7 and Question 9.

DATA REQUEST NO. 14: [Provided by Mea Halperin]

Please explain, for each and every “error” and “omission,” what efforts ORA took to clarify and resolve that issue with SDG&E, and also what efforts SDG&E made to clarify and resolve that issue with ORA. On page 1-3, ORA claims that “SDG&E did not address ORA’s discovery questions about additional unexplained self-schedule entries.” With respect to this statement, please:

- a) State whether ORA reviewed SDG&E’s full description of the self-schedule issue identified in SDG&E’s Prepared Direct Testimony of Joseph Pasquito at JP-27. If so, please explain in full exactly what aspect of the self-schedule issue was “unexplained,” as ORA claims.

Objection: Redundant. Asks for material ORA already provided in its testimony.

Response: Please see ORA testimony, p. 2-16, lines 1-20 and p. 2-17, lines 1-9. In addition, yes, ORA reviewed Mr. Pasquito’s testimony.

- b) State whether ORA reviewed SDG&E’s full description of the self-schedule issue in SDG&E’s Prepared Direct Testimony of Joseph Pasquito, Attachment D. If so, please explain in full exactly what aspect of the self-schedule issue was “unexplained,” as ORA claims.

Objection: Redundant. Asks for material ORA already provided in its testimony.

Response: Please see ORA testimony, p. 2-16, lines 1-20 and p. 2-17, lines 1-9. In addition, yes, ORA reviewed Mr. Pasquito’s testimony.

- c) State whether ORA reviewed SDG&E’s response to ORA’s Question 3.a in ORA’s 16th Set of Data Requests. If so, please explain in full exactly what aspect of the self-schedule as “unexplained,” as ORA claims.

Objection: Redundant. Asks for material ORA already provided in its testimony.

Response: Please see ORA testimony, p. 2-16, lines 1-20 and p. 2-17, lines 1-9. In addition, yes, ORA reviewed SDG&E’s responses to ORA’s Question 3.a in ORA’s 16th set of data requests.

- d) Please provide ORA’s understanding of the term “inadvertent” as SDG&E used that term to describe this “inadvertent” self-schedule issue. Please explain what aspect of SDG&E’s “inadvertent self-schedule” is “unexplained,” as ORA claims.

Objection: Redundant. ORA already provided this information in ORA’s testimony.

Response: Please see ORA testimony, p. 2-16, lines 1-20 and p. 2-17, lines 1-9.

- e) Please state whether ORA reviewed SDG&E’s full description of the self-scheduling issue as restated in the Prepared Rebuttal Testimony of Joseph Pasquito at JP-20, where SDG&E indicates: SDG&E already provided the reason in the original workpapers in *Attachment D – 2016 ERRA Comp – Self Schedules Supp Data FINAL.xlsx* on tab “All Detailed Support Data” in column S and were further summarized on tab “3ab”. This reference clearly states that the reason for self-scheduling was due to fuel limitations which is non-discretionary and intentionally submitted. Please explain what aspect of this matter remains “unexplained,” as ORA claims.

Objection: Question is not formulated to lead to discoverable information and argues SDG&E’s position. Redundant. ORA already provided this information in ORA’s testimony.

Response: Yes, ORA reviewed SDG&E’s description of the self-scheduling issue. ORA discussed the issues in ORA testimony, p. 2-16, lines 1-20 and p. 2-17, lines 1-9.

- f) If, despite each of SDG&E’s above, full explanations of this matter, ORA still believed that this matter was “unexplained,” why did ORA not take any further action to contact SDG&E, such as by calling SDG&E’s case manager or counsel, or issue a further data request clearly explaining what ORA did not understand about SDG&E’s prior explanations?

Objection: Question is argumentative and is not formulated to lead to discoverable information. Seeks ORA to provide information about SDG&E activities.

Response: SDG&E requested a compressed testimony schedule at the August 1, 2017 prehearing conference. According to the August 18 scoping memo, ORA had to meet the September 28 due date for ORA testimony. There was no additional time for ORA to ask the same questions repeatedly as SDG&E has a responsibility to provide complete, meaningful, and coherent answers to any and all data requests.

DATA REQUEST NO. 15: [Provided by Mea Halperin]

With respect to commitment cost reporting, please:

- a) explain ORA's view of what value to ORA's analysis the reason for the selection of proxy vs. registered cost;

Objection: Redundant. Seeks information already provided in ORA testimony.

Response: Please see ORA testimony p. 2-13, lines 8-15.

- b) explain if ORA has reviewed said reporting as appearing in SDG&E's October 24, 2017;

Objection: It is unclear if there is a particular commitment cost reporting SDG&E is referring to.

Response: To the extent SDG&E is referring to the reporting in SDG&E's testimony and Attachment C, yes, ORA reviewed SDG&E's commitment cost reporting.

- c) if the answer to (b) is no, please explain why ORA has not done so; if the answer to (b) is yes, please provide ORA's assessment of that report.

Objection: ORA's assessment of SDG&E's October 24, 2017 rebuttal testimony will be presented either at hearings and/or in briefing.

Response: Notwithstanding the objection, please see ORA testimony at p. 2-13, lines 5-19.

DATA REQUEST NO. 16: [Provided by Mea Halperin]

On page 1-3, ORA asserts that “SDG&E did not demonstrate how it is able to optimize its dispatch based on its reported inputs.” With respect to this statement, please:

- a) explain in detail ORA’s experience in analyzing hydro resources that are contractually required to balance water volumes weekly;

Response: ORA witness Mea Halperin has previous experience analyzing hydro issues in A.16-02-019, A.16-04-001, and A.17-02-005.

- b) explain in detail how the overall water level of a hydro resource factors into ORA’s LCD analysis for a hydro resource in which SDG&E does not manage the water level?

Response: Please see ORA testimony on page 2-23.

DATA REQUEST NO. 17: [Provided by Patrick Cunningham]

What is the benefit of comparing program utilization, as defined by ORA, as indicated at page 2-27, Table 2-1, for determining effectiveness of Demand Response programs, when that depiction of “utilization” includes hours when the program’s triggers were not met?

Response: Utilization shows how often the program was dispatched as a proportion of how often it may be dispatched according to the resource’s tariff. If a program is utilized often, then the program is taking advantage of the fixed costs of the program that are incurred regardless of dispatch activity. An historical comparison of such utilization, shown in Table 2-1, allows for consideration of the program’s activity in terms of the program’s design. For example, if a program’s triggers are never met, then the utility should consider a re-evaluation of the program’s triggers.

DATA REQUEST NO. 18: [Provided by Patrick Cunningham]

On page 2-30, ORA states that “SDG&E did not report any instances when it exercised its discretion to not dispatch its DR resources, but SDG&E also failed to report and explain a significant amount of the instances when trigger conditions were met but no dispatch occurred.” With respect to this statement:

- a) Please explain if the first part of the above sentence, before the comma in the sentence, is making a different a different point from the second part of the sentence, after the comma. If the two parts are intending to convey the same point, please so indicate;

Response: This was a typographical error. The portion before the comma is making a different point from that of the second.

- b) Please provide a citation to the Commission requirement that supports ORA’s assertions on both halves of this sentence.

Objection: Redundant as already discussed in ORA testimony. Does not seek information in the sole possession of ORA. SDG&E has the same access to Commission decisions and the goal of discovery is usually to reveal material in the possession of one party.

Response: See D.15-05-005 Appendix B, Item 1 and Item 4.

- c) Please provide a citation for any Commission decision that indicates that the information sought in the above sentence is not required by the Commission.

Objection: Does not seek information in the sole possession of ORA. SDG&E has the same access to Commission decisions and the goal of discovery is usually to reveal material in the possession of one party. Argumentative.

Response: See D.15-05-005 Appendix B, Item 1 and Item 4.

- d) Please indicate if ORA asked any data requests regarding the information that was allegedly omitted; if so, please provide a copy of ORA’s data request and SDG&E’s response to it.

Objection: Question is irrelevant to SDG&E’s responsibility of providing the necessary information in the application and testimony to meet SDG&E’s burden of proof of showing that SDG&E met Standard of Conduct 4 and prudently managed its resources.

Response: Notwithstanding the objection, ORA did not submit data requests regarding the statement “SDG&E did not report any instances when it exercised its discretion to not dispatch its DR resources, but SDG&E also failed to report and explain a significant amount of the instances when trigger conditions were met but no dispatch occurred.”

DATA REQUEST NO. 19: [Provided by Michael Yeo]

For an outage at a utility-owned generator (UOG) that last slightly more than 3 days, one that is unique and not expected to recur, please:

- a) explain in detail how many days of time a reasonable manager should devote to developing new procedures for that unique problem;

Objection: ORA's analysis of UOG outages are on a case-by-case basis. Question calls for speculation and legal conclusions.

Response: To the extent the question refers to SDG&E and A.17-06-006, ORA is not an operator of a generation facility. The operator of the facility has the best comprehensive and in-depth knowledge of its daily facility operations to make a determination as to the amount of time it should devote to develop new procedures for what it deems as a unique problem.

It is up to SDG&E, the operator, to explain why ORA's recommendation on the finding(s) should not be implemented, based on SDG&E's comprehensive and in-depth knowledge of the facility's operations.

- b) explain in detail if a reasonable manager should postpone the re-start of a UOG in order to conduct further diagnostic work for a relatively small problem that is not expected to recur;

Objection: Question vague, overbroad, and is not formulated to discover relevant facts as it is argumentative.

Response: See response to question 19a.

- c) please provide a citation to all Commission directives indicating that SDG&E must provide a "root cause analysis" for a given UOG outage, and citations for any Commission decision that indicates that SDG&E's not providing a root cause analysis represents "SDG&E's failure to investigate on the root cause of" the outage, as indicated at page 3-25. If none exists, please so state.

Objection: Vague and overbroad as it is unclear when SDG&E states "citation to all Commission directives," whether SDG&E is referring to one Commission decision, several decisions, or a general policy.

Response: ORA is not aware of any such citation. ORA's statement regarding "SDG&E's failure to investigate on the root cause" of the outage was based on the fact that SDG&E was unable to explain how the foreign object intruded into the Intermediate Pressure system, and

caused the outage.

- d) Does the Commission's "reasonable manager standard" require a root cause analysis for every UOG outage? If so, please provide a citation for that requirement.

Objection: ORA evaluates UOG outages on a case-by-case basis. Question is argumentative and requires a legal conclusion.

Response: Notwithstanding the objection, ORA is not an operator of a generation facility. The operator of the facility has the best comprehensive and in-depth knowledge of its daily facility operations to make a determination as to whether it should require a root cause analysis for every UOG outage. If SDG&E does not prepare a root-cause analysis, it should explain why.

- e) explain in detail, for ORA's UOG testimony at issue in this proceeding, ORA's staff's experience in managing, operating and maintaining a UOG.

Objection: Vague and overbroad as it is not clear to which part of ORA's testimony this question is referring to.

Response: Notwithstanding the objection, ORA is not an operator of a generation facility. ORA testimony and its recommendations are based on information provided by SDG&E in its testimony and data request responses. ORA's witness qualifications are a part of ORA's testimony; please see qualifications of Michael Yeo.

DATA REQUEST NO. 20: [Provided by Ayat Osman]

Please list and explain each element of an IOU's ERRRA Compliance GHG showing that is required by the Commission and identify, by Commission decision and page number, the basis for that requirement.

Objection: Question is redundant as ORA explained GHG compliance requirements in ORA's testimony.

Response: Notwithstanding the objection, please see ORA testimony at testimony Section III-A. "Background" (pages 4-3 to 4-9) of Chapter 4: GHG Compliance Instruments and Costs.

DATA REQUEST NO. 21: [Provided by Ayat Osman]

Please provide a citation to, and explain, each Commission requirement that authorizes ORA to recommend that the Commission require SDG&E to “explain its procurement decisions in future applications,” as indicated at page 4-13 through 4-14.

Objection: Vague, assumes facts not in the record. Question is argumentative and not formulated to discover relevant information. Question regarding ORA’s authority to make recommendations is not relevant to SDG&E’s requests in Application 17-06-006.

DATA REQUEST NO. 22: [Provided by Ayat Osman]

Page 4-14 states that “ORA recommends that SDG&E pursue procuring additional offsets up to the maximum 8% of its compliance obligation for the Second Compliance period to reduce compliance costs that is [sic] borne by ratepayers” With respect to this statement, please explain whether it is ORA’s position that SDG&E did not meet this “up to the maximum of 8% requirement,” and if so, in what respect(s) SDG&E did not meet this requirement.

Objection: Redundant. ORA testimony already addressed the issues of whether SDG&E met the 8% offset procurement level.

Response: Notwithstanding the objection, see ORA testimony at Section IV-C. "SDG&E Should Explain its Procurement Decisions in Future Applications" (pages 4-13 to 4-14) of Chapter 4: GHG Compliance Instruments and Costs.

DATA REQUEST NO. 23: [Provided by Ayat Osman]

With respect to ORA's Testimony at pages 4-17 through 4-18, please:

- a) Please explain how, in ORA's view, SDG&E did not follow the direction in Attachment C of D.15-01-024, which requires the following: "Each month, a utility records its GHG costs to its respective balancing account. These costs are calculated as the weighted average cost (WAC) of compliance instruments held in inventory at the end of a month multiplied by the quantity of emissions generated in that month for which the utility has a physical compliance obligation."

Objection: Redundant as already explained in ORA's testimony.

Response: Notwithstanding the objection, please see ORA's testimony at Section IV-E. "SDG&E's Calculations of Weighted Average Cost of its Compliance Instruments are Inconsistent with Commission Requirements," (Lines 17-23, pages 4-17 to Lines 1-11, pages 4-18) of Chapter 4: GHG Compliance Instruments and Costs.

- b) Show requirement in D.15-01-024 or other decision that requires SDG&E to abandon its obligation to follow Generally Applicable Accounting Principles (GAAP).

Response: Chapter 4 of ORA testimony did not state SDG&E is required to abandon its obligation to follow Generally Applicable Accounting Principles.

- c) Indicate whether there is any evidence that D.15-01-024, Attachment C, expects SDG&E to incur stranded costs by following the following Attachment. If so, please list and explain all such evidence, with citations to any legal or regulatory requirement.

Objection: Question is speculative, assumes facts not in the record, and calls for legal conclusions.

Response: Chapter 4 of ORA testimony did not state that "D.15-01-024, Attachment C, expects SDG&E to incur stranded costs by following the following Attachment."

- d) Provide an example demonstrating how SDG&E could utilize ORA's interpretation that SDG&E is not to include monthly GHG emissions in its weighted average cost calculation and, at the same time, not incur stranded costs.

Objection: Question is speculative, assumes facts not in the record, and calls for legal conclusions.

Response: Chapter 4 of ORA’s testimony did not address stranded costs.

- e) Please explain how ORA’s position on the calculation of weighted average costs can be reconciled with Public Utilities Code Section 454.5(d) et seq. that requires, among other things, that the Commission “ensure timely recovery of prospective procurement costs.”

Objection: Question is speculative and calls for legal conclusions.

Response: ORA briefs will address legal issues, including Public Utilities Code Section 454.5(d) et seq.

DATA REQUEST NO. 24: [Provided by Patrick Cunningham]

With reference to ORA's testimony in A.17-02-005 and A.17-04-004, please indicate whether ORA recommended, as it did on page 5-1, that "the Commission require SDG&E to include reporting of all contracts in future ERRA Compliance applications as required by SOC4 and the scope of ERRA proceedings." If so, please provide a citation to those recommendations.

Objection: Question is burdensome, vague, and not formulated to discover relevant information as the question is not related to SDG&E and A.17-06-006.

Response: To the extent any material is relevant to A.17-06-006, this recommendation was not made for A.17-04-004 because Southern California Edison reported its Demand Response Auction Mechanism (DRAM) contracts. This recommendation was not made for A.17-02-005 because the ERRA witness was not aware of the execution or existence of DRAM contracts at the time the application was filed.

DATA REQUEST NO. 25: [Provided by Patrick Cunningham]

Please provide a list of “all” contract types that ORA views in the scope of an IOU’s ERRA Compliance showing, and for each type of contract, please provide a citation to the regulatory requirement that requires it to be provided in an IOU’s showing.

Objection: Question is burdensome, vague, and not formulated to discover information relevant to SDG&E and A.17-06-006.

Response: To the extent any material is relevant to A.17-06-006, ORA discussed SDG&E’s contracts in its testimony on page 5-10, lines 16-19. ORA considers resources which the utility uses to meet the load it serves, including energy supply resources and load-modifying resources, to be within the scope of ORA’s review of ERRA contract administration.

Page 5-10, lines 19-21,reference Standard of Conduct 4. ORA considers “all contracts” to refer to the least-cost dispatch of energy; load-modifying resources have an impact on the least-cost dispatch of energy. The administration of contracts for load-modifying resources such as DRAM must be reported in order for ORA and the Commission to determine if prudent administration occurred.

Outside of ERRA documentation, the CPUC defines a contract in General Order 96 Industry Rule 1.1 as, “An agreement between a Utility and a developer or customer to provide service under rates or conditions not offered in the Utility’s tariffs.” The customer program design of DRAM is recognized by the CPUC and administration of those contracts should be submitted for review in ERRA along with other energy supply and load-modifying resource contracts.

DATA REQUEST NO. 26: [Provided by Patrick Cunningham]

Regarding ORA's statements on page 5-10 through 5-11 regarding the Demand Response Auction Mechanism (DRAM) pilot, please:

- a) Provide a citation to any legal or regulatory requirement that requires any IOU to include DRAM contract administration in its ERRA Compliance showing. If there is none, please so state;

Response: See response to question 25. Please refer to page 5-10 of ORA testimony which cites such a requirement is in the scope of the current proceeding and Standard of Conduct 4.

- b) Please indicate whether (1) in any ERRA Compliance proceeding other than the subject proceeding, ORA has recommended that an IOU provide its DRAM contracts, and (2) whether the Commission has addressed said recommendation. If so, please provide complete details for both questions.

Objection: Question is burdensome, vague and overbroad as it is not formulated to discover information relevant to SDG&E and A.17-06-006.

Response: See response to question 24. ORA has not made a recommendation concerning DRAM contract reporting. DRAM contracts have only come into existence relatively recently, having been approved by the Commission in a disposition letter dated March 10, 2016.