

**ORA DATA REQUEST
ORA-SDGE-124-MRK
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 6, 2018
DATE of AMENDED RESPONSE: FEBRUARY 26, 2018**

Exhibit Reference: SDG&E-40
SDG&E Witness: Eric Dalton
Subject: Miscellaneous Revenues

Please provide the following:

1. SDG&E's revised Excel Workpaper "SDG&E-40-WP-R-EDalton Revised Misc Revenue WP.xlsx" is not a working spreadsheet with Excel calculations indicating exactly how SDG&E's Miscellaneous Revenues forecasts were computed. Please provide a working version of this spreadsheet with such Excel calculations performed.

SDG&E Amended Response 01:

SDG&E objects to the instructions in Question 1 on the grounds that they are unfairly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

SDG&E's response to ORA-SDGE-124-MRK already provided the data so that every number in SDG&E's workpaper "SDG&E-40-WP-R-EDalton Revised Misc Revenue WP.xlsx" can be traced as to what data inputs and adjustments contributed to that number. On January 21, 2017, SDG&E informed ORA that the information requested is not available in linked form, but offered to guide ORA through the miscellaneous revenue forecast supplemental spreadsheets and how they interact. ORA declined the offer as inappropriate. SDG&E's offer is appropriate as it is consistent with the Rate Case Plan's contemplation of informal meetings to explain workpapers (see page A-10). To the extent ORA and other parties need to rely on formal discovery, SDG&E's previous response provides that information.

While not required to create new data or present existing data in a different form, to facilitate ORA's review in this one instance, SDG&E has created one attached file, listed below, that is a working spreadsheet backing up the forecasts contained in SDG&E-40-WP-R. The forecasted annual totals have been linked to the supplemental tabs where the forecasted numbers reside.

ORA-SDGE-124-MRK SDGE-40-WP-R_EDalton Revised Misc Revenue WP_v2