

**ORA DATA REQUEST  
ORA-SDGE-154-MRL  
SDG&E 2019 GRC – A.17-10-007  
SDG&E RESPONSE  
DATE RECEIVED: MARCH 6, 2018  
DATE RESPONDED: MARCH 20, 2018**

**Exhibit Reference:** SDGE-24-WPC and SDGE-25-WPC

**SDG&E Witnesses:** Christopher Olmsted and Gavin Worden

**Subject:** SDG&E's Responses to Data Requests ORA-SDGE-042-MRL and ORA-SDGE-043-MRL

**SDG&E's responses were deficient** because items 1, 2, 3, 4 and 5 were not provided. More specifically:

I. The numbers are not linked from one Tab/Worksheet to the next. (ORA-SDGE-042-MRL, items 1, 2, and 3; ORA-SDGE-027-MRL, items 1, 2, and 3.) More specifically, in the Excel workbooks SDG&E provided in response to data requests ORA-SDGE-042-MRL and ORA-SDGE-043-MRL, none of the numbers in any of the cells in each and every worksheet is referenced to workpapers or to cells in other worksheets/Tabs containing numbers that originate in the "Dataset" worksheet/tab. Also, the "Dataset" worksheet/tab provided in response to data request ORA-SDGE-043-MRL is only SCG data; therefore, the dataset for SDG&E is entirely missing.

II. The support for each and every adjustment, including source documents, inputs, formulae, are missing. (ORA-SDGE-042-MRL, item 3a; ORA-SDGE-043-MRL, item 4.) More specifically, in the Excel workbook attachments SDG&E provided in response to data requests ORA-SDGE-042-MRL and ORA-SDGE-043-MRL, none of the numbers is supported by anything, including links, references or citations.

One IT Capital example: The finest level of technical detail for 00811B.001 –T19006 2017 Residential TOU Default Pilot Program in SDG&E's workpapers is three unsupported numbers i) 1,732, ii) 2,513, and iii) 15.1 for FTE. (Exhibit No. SDGE-24-CWP-IT, p. 51.) In the Excel workbooks SDGE provided in response to ORA, there are the same three unsupported numbers (attachment workbook/file "ORA-SDGE-027-MRL IT", worksheet/Tab "Dataset").

The point being that there is no support at all for any and all values; therefore, decision-makers and independent, affected parties cannot determine a) what are the qualifications of the "subject matter experts," b) how the unidentified SME arrived at "2,513" instead of 2,600 or 2,000 or some random number, c) what work, expertise, materials, etc., if any comprises any number, and d) in the case of discrepancies which value is correct and how we know it to be correct.

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A Cyber Security O&M example: The finest level of technical detail for Cost Center 2100-3781 – E. Security Contracts, 2017 Critical Infrastructure Protection SDG&E is i) 2,700 and ii) MEHLERS201611161501449130. (Exhibit No. SDGE-25-WP, p. 50.) In the Excel workbooks SDGE provided in response to data request ORA-SDGE-042-MRL, there is the same unsupported number, 2,700. (Attachment workbook/file “ORA-SDGE-042-MRL Cyber Security”, worksheets/Tabs “Q3 – Adjustments by Wkpr,” “Q4 – Adjustment Detail.”)

Again, there is no support for any and all values and Matt Ehlers is not identified as the subject matter expert who prepared these numbers and workpapers. No one can determine a) what the qualifications are of Matt Ehlers and b) how he arrived at the 2,700 or any other value in this workbook.

III. There was no statement attesting to the fact that no more supporting materials are available. ORA and decision-makers are entitled to all supporting technical details and if none are known or forthcoming, then SDG&E is obligated to explicitly state that all support has been provided.

**Please provide the following to cure these deficiencies:**

1. Pursuant to the original request provide all supporting materials, including the source documents, inputs, explanations of the assumptions, formulae, etc., used to derive each and every forecasted number. If all supporting documentation has been provided, then explicitly state so, but if it has not been provided, then explain why.

**SDG&E Response 01:**

SDG&E objects to this question. It would be unduly burdensome for the Company to provide every conceivable supporting piece of documentation in the Company’s possession. Notwithstanding this objection, SDG&E responds as follows.

As stated during a call between the parties on March 12, 2018, workpapers that appear in testimony are not created from, nor do they originate as Excel spreadsheets. Workpapers are produced from a database system which consists of many data tables that are linked to allow grouping of cost centers and editing of historical values.

SDG&E believes that the “Adjustment Detail” column in the “Q3 – Adjustments by Wkpr” tab in the attachments “ORA-SDGE-042-MRL IT” and “ORA-SDGE-042-MRL CYBER SECURITY” files show sufficient explanations for each adjustment made to the historical values. For example, the \$584,100 adjustment to IT the workpaper group 1IT001 is for “filing 9 labor vacancies” and “assumes 59% O&C ratio” and \$110,000 salary.

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**SDG&E Response 01 Continued:**

As stated in the testimony of Chris Olmsted (Exhibit SDG&E-24), concept documents are developed as high-level assessments of IT capital projects. The document contains project elements such as cost estimates, business benefits and project schedules. It should be noted that these documents contain essentially the same information to what is provided in the IT and Cybersecurity workpapers. To illustrate this point, we have provided the attached file, “ORA-SDGE-154-MRL Q1 Attachment” as an example.

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2. Project numbers for each forecast consistent with the project numbers used in the inputs to the RO model.

**SDG&E Response 02:**

Please refer to the attached file, “ORA-SDGE-154-MRL Q2-3 Attachment.”

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3. The source documents for the in-service dates and amounts of CWIP.

**SDG&E Response 03:**

The project in-service dates and amounts of CWIP are determined by subject matter experts. Please refer to the attached file, “ORA-SDGE-154-MRL Q2-3 Attachment” for in-service dates and amounts of CWIP for the IT and Cybersecurity capital projects.

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4. The qualifications of the employee who actually prepared the forecast.

**SDG&E Response 04:**

The IT and Cybersecurity forecasts were developed from planning exercises facilitated by the IT leadership. Teams of IT subject matter experts review current operations and future strategies to determine any areas needing attention. Forecasts are submitted to IT leadership that are responsible for various disciplines – applications, infrastructure, telecom, project management, architecture & integration, etc. The IT leadership team reviews proposed changes along with the Chief Information Officer (CIO) to decide which items will be included in plans. The results of this process were leveraged to provide IT forecasts in this GRC.