

Bates-numbered, and indexed if voluminous. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

As to any Data Request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate Data Request.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

DEFINITIONS

- A. As used herein, the term “you,” “your(s),” “SDG&E” mean San Diego Gas and Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- D. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- E. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- F. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- G. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

Department of Energy (DOE) Request for Information (RFI) on Executive Order 13771

- 1) Provide all documents (draft and final) and all emails relating to DOE Rulemaking DOE_FRDOC_0001-3375, DOE's RFI pertaining to its implementation of Executive Order 13771 Reducing Regulation and Controlling Regulatory Costs.
- 2) Provide the date that the final letters were docketed to DOE and the docketed comment letters.

DOE Residential Furnace Rulemaking

- 3) Provide all documents (draft and final) and all emails regarding DOE's Residential Furnace rulemaking since January 1, 2014 in any phase of the rulemaking.
- 4) Provide any analysis completed in response to these rulemakings.
- 5) Provide the dates of all comment letters submitted to DOE and all docketed comment letters or data.

DOE Rulemaking Non-Response or Non-Support

- 6) Provide a list of all DOE rulemakings where you either did not comment on the proposed efficiency level or did not support DOE's proposed efficiency level (Trial Standard Level or TSL) or a higher efficiency level (TSL).
- 7) Describe your rationale for not commenting on or for not supporting DOE's proposed efficiency level (TSL) for all rulemakings responsive to Question 6..

END OF DATA REQUEST