

OEIS DATA REQUEST: OEIS-DR-EUP-26-02
SDG&E RESPONSE

Date Received: 06-16-2026
Date Submitted: 06-30-2026

I. GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.
9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.
10. SDG&E objects generally to each request that calls for information that contains trade

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secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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III. RESPONSES

QUESTION 1

Please identify and describe all existing federal, state, and other non-ratepayer funding opportunities that your Large Electric Corporation (LEC) is currently utilizing to support electrical undergrounding activities.

For each funding opportunity please provide:

- 1.The funding source
- 2.Administering entity
- 3.Total amount awarded
- 4.Amount received to date
- 5.Applicable funding period
- 6.Eligibility requirements
- 7.The specific undergrounding projects

RESPONSE 1

SDG&E is not currently implementing any electrical undergrounding activities funded by non-ratepayer funding sources as SDG&E is not aware that any such funding is currently offered or available.

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QUESTION 2

Please identify and describe all non-ratepayer funding opportunities that your LEC has identified and plans to pursue in support of its Electrical Undergrounding activities.

For each funding opportunity please provide:

- 1.The funding source
- 2.Administering entity
- 3.Estimated potential funding amount
- 4.Anticipated timeline for application and award
- 5.Eligibility requirements
- 6.Likelihood of award
- 7.The specific undergrounding projects or program components intended to be supported.

RESPONSE 2

As of June 30, 2026, SDG&E has not identified any non-ratepayer funding opportunities for electrical undergrounding that are being offered or available.

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QUESTION 3

Please describe your LEC's strategy, policies, and processes for identifying, evaluating, and pursuing non-ratepayer funding opportunities to support electrical undergrounding activities. Include a description of procedures for tracking and applying for funding opportunities, and how your LEC ensures that non-ratepayer funding is maximized to reduce costs to ratepayers.

RESPONSE 3

Please note that SDG&E's non-ratepayer funding process and/or strategy is being finalized and will be presented more fully when SDG&E submits an EUP, consistent with the statute. That said, SDG&E responds as follows:

SDG&E is committed to pursuing applicable non-ratepayer funding sources to support the EUP and to reduce the program's cost to ratepayers to the extent that any such funding sources are available.

SDG&E's policy regarding non-rate payer funding sources as part of its EUP is to continually monitor potential non-ratepayer funding sources, including state and federal opportunities, to see if any such funding is available for SDG&E to apply for. SDG&E is not currently aware of any such funding.

SDG&E is establishing a process for tracking and applying for any available funding opportunities that it will include with its EUP, consistent with the statute.

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END OF REQUEST