

SAN DIEGO GAS & ELECTRIC COMPANY
First Set of Data Requests to The Nevada Hydro Company (TNHC)

June 2, 2007

A. 06-08-010

- (1) Please provide all documents that contain, reflect, discuss, summarize, or were used in the analyses and conclusions set forth in the TNHC testimonies, including without limitation, any draft or final reports prepared by or on behalf of TNHC, and any workpapers relating to any such analysis.
- (2) Please provide the results together with workpapers for the following 2015 and 2020 Plexos cases:
 - a. Do not model the LEAPS pumped storage generation or the LEAPS TE/VS transmission and consistent with SDG&E's case 200.
 - b. Model the Sunrise Project, consistent with SDG&E's case 201.
- (3) Please provide a full project description for LEAPS TE/VS transmission project.
- (4) Please provide the proposed in-service date for the LEAPS project (both the generation and transmission) and describe the licensing steps that still remain, including estimate date(s) of permit receipt.
 - a. Please provide all schedules developed for this project, including but not limited to schedules concerning developing final engineering studies, development of permits and permit acquisition, final construction drawings, FERC/lead agency review, mitigation plans and studies, critical path analysis, equipment procurement; and subsurface geologic investigations.
 - b. When does TNHC expect to secure project financing?
 - c. Because the upper reservoir has been classified as a high hazard dam, has TNHC initiated or completed dam failure analysis, inundation mapping, and/or a formal Emergency Action Plan (EAP) per FERC criteria? If not, what is its expected schedule to do so?
- (5) Please provide a detailed cost estimate for the LEAPS pumped storage generating unit, including a cost estimate based on the Final Environmental Impact Statement.
- (6) Please provide a detailed cost estimate for the LEAPS TV/VS transmission line.
- (7) Please provide the status of LGIA negotiations with Southern California Edison Company for the LEAPS project.

- (8) Please provide all power flow cases used by Mr. Depenbrock to support this testimony.
- (9) Please describe the status of the project contract negotiations with project partner Elsinore Valley Municipal Water District “(EVMWD)”, including (1) the status of any alternative dispute resolution relating to such contract, and (2) an estimated date for execution of the project contract.
- (10) Admit or deny – TNHC has asked the FERC in P-11858 to license the TE/VS transmission separately from the LEAPS pumped storage project.
 - a. If you admit, please describe the legal basis for your belief that FERC may license the TE/VS project separate from the LEAPS pumped storage project, including citations to the Federal Power Act, and any FERC and Federal Power Commission precedent, including any pertinent authority in the federal courts.
- (11) Admit or deny – EVMWD has asked the FERC to require TNHC to commence construction of the LEAPS pumped storage project prior to commencing construction of the TE/VS line
 - a. Please produce all documents concerning the position of EVMWD concerning the relationship of the TE/VS Project to the LEAPS pumped storage project, including, but not limited to, the licensing or construction of the TW/VS project separately from the LEAPS pumped storage project.
- (12) Admit or deny – The Environmental Impact Statement issued by FERC on January 30, 2007 in Project No. P11858 takes the position that TNHC must seek a CPCN for the TE/VS transmission project from the CPUC, because FERC can only license a "primary line," which the EIS finds could be either an interconnection with SCE, or with SDG&E, but not both.
- (13) Please describe TNHC’s contingency plans to secure condemnation authority for the TE/VS line with the project in the event that:
 - a. FERC does not license the entire TE/VS project, or
 - b. EVMWD withdraws from the TE/VS project.
 - c. Please produce all documents concerning either such contingency.
- (14) Admit or deny: EVMWD lacks the legal authority to participate in the TE/VS project if the project proceeds separately from the LEAPS pumped storage project.

- a. If you deny, please describe in detail the basis for your denial, including citation to any legal authority that you rely on.
- b. Please produce all documents concerning the authority of EVMWD to participate in the TE/VS project and/or the LEAPS pumped storage project.

DEFINITIONS

- A. The term “document,” as used herein, has the same meaning as is set forth in California Evidence Code Section 250, and includes, without limitation, all data maintained in any database and expression or communication of information in any form.
- B. The term “used,” as used herein, means, without limitation, “considered, referred, employed, applied and/or utilized.”
- C. The term “all,” as used herein, means “any and all.”
- D. The term “concerning” as used herein, means, without limitation, “constituting, comprising, containing, describing, analyzing, evidencing, summarizing, incorporating and/or referring or relating to in any way.”

INSTRUCTIONS

- A. These data requests shall be deemed to seek the production of documents and/or information within your possession, or subject to your custody or control, including documents and information held by you or by any past and present directors, officers, agents representatives, employees, investigators, attorneys, and accountants, or in the possession of your or their consultants, investigators, advisors, agents or associates.
- B. If you object that a term or phrase is vague, ambiguous or indefinite, you are requested to provide your understanding of the term or phrase, or what you believe to be a reasonable interpretation of the term or phrase, and respond in accordance with that understanding or interpretation. If you object that a request is overbroad or to any extent beyond the scope of discovery, you are requested to explain the manner and extent to which it is overbroad or beyond the scope of discovery. If you object that a request is unduly burdensome, you are requested to explain the manner and extent to which it is unduly burdensome and to state whether you will make documents or other information responsive to the request available to SDG&E for inspection and/or photocopying in order to avoid the claimed burden. If you object to only a portion of a request, you are requested to respond and

produce documents with respect to that portion of the data request to which you do not object. For example, if a request were to ask for production of certain “photographs and pictures,” and you were to object to the term “pictures” is ambiguous, you are requested in that instance to nonetheless produce all documents that are responsive with respect to the term “photographs.”

- C. If, after you have conducted a reasonable investigation, a complete answer or production of documents cannot be provided with respect to any request herein, you are requested to state that such is the case and to respond to the fullest extent possible, stating what responsive documents or information are available, what documents or information cannot be provided, why such documents or information are unavailable, and what efforts were made to obtain the unavailable documents or information.

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