**ORA DATA REQUEST**
**ORA-SDG&E-DR-043-SWC**
**SDG&E 2016 GRC – A.14-11-003**
**SDG&E RESPONSE**
**DATE RECEIVED: JANUARY 16, 2015**
**DATE RESPONDED: JANUARY 27, 2015**

**Exhibit Reference:** SDG&E-16

**Subject:** Fleet Services

**Please provide the following:**

1. In response to data request ORA-SDG&E-DR-017, question 3(a), SDG&E responded that it replaced 205 out of the forecast 270 "New Fleet Units for Replacements" in 2014. On page 11 of Exhibit SDG&E-16-WP, SDG&E provides the 2014 to 2016 amortization forecast for "Fleet Replacements 2014 through 2016." Please provide an update of the amortization forecast for years 2014 through 2016 based on the recorded "New Fleet Units for Replacements" of 205 units.

**SDG&E Response:**

The Rate Case Plan does not provide for the utility to update its forecasted expenses, either up or down, in its application except for certain, specific and identified items in the update filing following hearings. As the utility is not entitled to revise its forecast up as circumstances may warrant, neither is the utility required to revise forecasts downward. Should a party choose to recommend a different funding level for a particular activity it is up to the party to derive a new forecast or other calculations to support that assertion.

**ORA DATA REQUEST**
**ORA-SDG&E-DR-043-SWC**
**SDG&E 2016 GRC – A.14-11-003**
**SDG&E RESPONSE**
**DATE RECEIVED: JANUARY 16, 2015**
**DATE RESPONDED: JANUARY 27, 2015**

2. In response to data request ORA-SDG&E-DR-017, question 3(b), SDG&E responded that "No incremental Fleet Units for Business Needs have been purchased in 2014. Due to reprioritization of funds in 2014, we have deferred purchase of some vehicles to 2015." On page 11 of Exhibit SDG&E-16-WP, SDG&E provides the 2014 to 2016 amortization forecast for "Incremental Fleet for Business Needs." Since SDG&E did not purchase any of the 41 "Incremental Fleet for Business Needs" that it forecast for 2014, please provide an update of the amortization forecast for "Incremental Fleet for Business Needs" for years 2014 through 2016 based on this new information.

**SDG&E Response:**

The Rate Case Plan does not provide for the utility to update its forecasted expenses, either up or down, in its application except for certain, specific and identified items in the update filing following hearings. As the utility is not entitled to revise its forecast up as circumstances may warrant, neither is the utility required to revise forecasts downward. Should a party choose to recommend a different funding level for a particular activity it is up to the party to derive a new forecast or other calculations to support that assertion.

**ORA DATA REQUEST**
**ORA-SDG&E-DR-043-SWC**
**SDG&E 2016 GRC – A.14-11-003**
**SDG&E RESPONSE**
**DATE RECEIVED: JANUARY 16, 2015**
**DATE RESPONDED: JANUARY 27, 2015**

3. In response to data request ORA-SDG&E-DR-017, question 3(c), SDG&E responded that "In November of 2014, the California Air Resources Board issued the Regulatory Advisory MSCD 14-18 granting an extension of these particular Diesel Particulate Filter Retrofits/Replacements that previously required replacement before the end of 2014. None of these retrofits have been completed in 2014." On page 11 of Exhibit SDG&E-16-WP, SDG&E provides the 2014 to 2016 amortization forecast for "Diesel Particulate Filter Retrofits/Replacements." Since SDG&E did not perform any of the 68 retrofits forecast for 2014, please provide an update of the amortization forecast for "Diesel Particulate Filter Retrofits/Replacements for years 2014 through 2016 based on this new information.

**SDG&E Response:**

The Rate Case Plan does not provide for the utility to update its forecasted expenses, either up or down, in its application except for certain, specific and identified items in the update filing following hearings. As the utility is not entitled to revise its forecast up as circumstances may warrant, neither is the utility required to revise forecasts downward. Should a party choose to recommend a different funding level for a particular activity it is up to the party to derive a new forecast or other calculations to support that assertion.