

**ORA DATA REQUEST**  
**ORA-SDGE-022-TCR**  
**SDG&E 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
**DATE RECEIVED: NOVEMBER 17, 2017**  
**DATE RESPONDED: DECEMBER 6, 2017**

**Exhibit Reference:** SDG&E-14, Chapter 4.I., page 68

**SDG&E Witness:** Alan F. Colton

**Subject:** Overhead Pools, Engineering, Overall and Electric Distribution (ED)

**General note 1:** This data request refers to three projects based on the assumption that they are typical, as defined in Question 1 below. If SDG&E's response to Question 1 indicates that this assumption was incorrect, and that there are better example projects, please respond to all other questions in this request using the projects provided in SDG&E's response, not the projects listed in the request.

**General note 2:** This data request uses the term "budget code" in two ways: 1) as specifically used by SDG&E in its workpapers; and 2) as a general term for all codes used by SDG&E to classify and account for different types of work, programs, or projects. Please contact the originator if this is not clear. A subsequent data request will seek to understand and differentiate all the specific accounting and project management codes used by SDG&E.

**Please provide the following:**

1. In the questions that follow, the following are provided as assumed examples of 1) a distribution only project; 2) a substation only project; and 3) a project with both distribution and substation work.
  - a. Is it correct that the Substation 12 kV Capacitor Upgrades project (budget code 8253) contains only substation work? If not, please explain.
  - b. Is the Substation 12 kV Capacitor Upgrades project (budget code 8253) a good example of a typical project that contains only work? If not, please explain and provide a better example from the projects included in Ex. SDG&E-14.
  - c. Is it correct that the C1450, MTO New 12 kV Circuit project (budget code 16268) contains only ED work? If not, please explain.
  - d. Is the C1450, MTO New 12 kV Circuit project (budget code 16268) a good example of a typical project that contains only ED work? If not, please explain and provide a better example from the projects included in Ex. SDG&E-14.
  - e. Is it correct that the Ocean Ranch project (budget code 5253) contains both substation and ED work? If not, please explain.
  - f. Is the Ocean Ranch project (budget code 5253) a good example of a typical project that contains both substation and ED work? If not, please explain and provide a better example from the projects included in Ex. SDG&E-14.

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**SDG&E Response 1:**

- a. Yes, it is correct that the Substation 12 kV Capacitor Upgrades project (budget code 8253) contains only substation work.
- b. Yes, the Substation 12 kV Capacitor Upgrades project (budget code 8253) is a good example of a typical project that contains only work.
- c. Yes, it is correct that the C1450, MTO New 12 kV Circuit project (budget code 16268) contains only ED work.
- d. Yes, C1450, MTO New 12 kV Circuit project (budget code 16268) is a good example of a typical project that contains only ED work.
- e. Yes, it is correct that the Ocean Ranch project (budget code 5253) contains both substation and ED work.
- f. Yes, the Ocean Ranch project (budget code 5253) is a good example of a typical project that contains both substation and ED work.

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2. Please explain the demarcation between work performed and tracked in budget code 901 versus budget code 904:
  - a. For example, is the demarcation generally based on specific types of equipment (e.g. all work upstream of the pothead exiting the substation is assigned to budget code 904), geography (e.g. all work performed outside of the substation fence is assigned to budget code 901),
  - b. Are there exceptions to the general demarcation provided in response to subpart a above? If so, please list and explain them.

**SDG&E Response 2:**

901 – Local Engineering – Electric Distribution Pool

This pool includes engineering work associated with construction of Electric Distribution assets (FERC accounts 108, 364-373 and 397).

904 – Local Engineering – Substation Pool

This pool includes engineering work associated with construction of Substation assets (FERC accounts 108, 352-353, 361-362 and 397). Please note that although the Substation Engineering pool includes work for both Electric Transmission and Electric Distribution assets, the Transmission portion of the pool costs has been excluded from the GRC request.

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3. Please explain if engineering and planning staff record the hours they work to budget codes 901, 904 only, or if they also record time worked on specific projects, such as the budget codes listed in Question 1 above.

**SDG&E Response 3:**

Engineering and planning work performed in a supervisory and/or support capacity is charged to the overhead pools. Work that is performed for a specific project is directly charged to the appropriate budget code.

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4. Referring to the “RefID” code on Ex. SDG&E-14 workpaper page 386:
  - a. Explain in lay terms all information provided in the “RefID” code,
  - b. For each year, describe in lay terms all information contained within the RefID” code. A hypothetical response could be “for the 2017 adjustment, John Smith made the adjustment on May 1, 2017 based on engineering judgement and data from the XYZ database.”

**SDG&E Response 4:**

- a. The RefID code is a data base designation designed to track adjustments made in GRID for audit purposes. This RefID consists of the initials and last name of the person making the adjustment, and a date and time stamp. Thus, the value could be JPJONES20171101154012567, which would indicate the adjustment was made by a J. P. Jones, on November 1<sup>st</sup> of 2017, at 15:40:12567 hours, or 3:40:12.567 in the afternoon.
- b. The RefID contains only information identifying the person who made the adjustment and that date/time stamp described in part a. It contains no other information regarding the nature or purpose of the adjustment.

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5. Referring to Ex. SDG&E-14 workpaper page 386, the statement “net upward adjustment made is based on a historical relationship of pool” is nearly meaningless in terms of helping ORA and the CPUC determine the basis of these adjustments and if they are reasonable or not. Please provide a detailed explanation of these adjustments, and provide all supporting evidence showing that they are reasonable.

**SDG&E Response 5:**

The forecast for the Electric Distribution Engineering Pool is based on the historical relationship between overhead pools and capital expenditures. This historical trend is applied to the forecasted increase in Electric Distribution capital work in order to determine the overhead pool funding request. Please refer to the Excel file “ORA-SDGE-025-TCR-OH Pools Supporting Tables.XLSX” provided with the response to DR ORA-SDGE-025-TCR.

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6. Referring to the first footnote on SDG&E-14 workpaper page 387, describe any “Non-GRC” costs excluded from the tabulated values.

**SDG&E Response 6:**

“Non-GRC” costs excluded from the GRC request include costs recovered through:

- Customer billables
- FERC regulatory mechanism
- Other regulatory proceedings

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7. Referring to Ex. SDG&E-14 workpaper pages 386 and 387, it appears that SDG&E forecast a 90% increase in FTEs in 2019 compared to the highest level of prior years  $((703.9-370.3)/370.3 = 90.01\%$ . Describe the drivers of this increase in forecast work for budget code 901.

**SDG&E Response 7:**

Full-Time Equivalents (FTEs) are calculated as a standard formula which divides all labor costs by an average salary of \$100 thousand. The increase in FTEs in these overhead pools is being driven by the increase in forecasted labor cost in other budgets such as New Business. These pools incur the costs for the activities described in the response to data request ORA-SDGE-025-TCR.

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8. Referring to Ex. SDG&E-14 workpaper page 387, it appears that SDG&E recorded expenditures for 2015 before adjustments were approximately 25% of prior years. Please explain why expenditures, and FTEs, were reduced in 2015.

**SDG&E Response 8:**

In 2015, the internal order numbers associated with the Electric Distribution Engineering Pool were changed in the SAP accounting system due to the implementation of a new time keeping system. However, the historical costs in GRID did not capture these internal order changes. As a result, 2015 expenditures and FTEs before adjustments represent only the portion of the costs up to the date the system was implemented. After the adjustment is made to account for the new internal orders, the 2015 and 2016 Labor, Non-Labor and FTE results are consistent with prior years historical costs.

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9. Referring to Ex. SDG&E-14 workpaper page 387, explain the adjustment for “Vacation and sick” and provide support for the specific values shown, including a description of the methodology and any quantification values used.

**SDG&E Response 9:**

Vacation and Sick Leave costs are estimated based on an aggregate average for the entire company, as a factor on direct labor using annual factors sponsored by the Shared Services Policy & Billing witness. Vacation and Sick (V&S) Factors for 2016 - 2019 applicable to forecast O&M and capital labor costs and hours are based on a three-year average rate through 2016 recorded V&S data. Please see the testimony and associated workpapers of James Vanderhye, Exhibit SDG&E-32.

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10. Referring to Ex. SDG&E-14 workpaper page 387, explain the adjustment for “escalation to 2016\$” and provide support for the specific values shown, including a description of the methodology and any quantification values used.

**SDG&E Response 10:**

Escalation to 2016\$ for historical values is accomplished by factors sponsored by the Cost Escalation witness Scott Wilder, and are obtained from the firm Global Insight, 1<sup>st</sup> Quarter 2017. Please see the testimony and associated workpapers to Exhibit SDG&E-39.

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11. Referring to Ex. SDG&E-14 workpaper page 388, define the meaning and use of “IO#s”.

**SDG&E Response 11:**

IO’s are Internal Orders that describe individual jobs within a controlling area. These Orders support action-oriented planning, monitoring and allocation of costs.

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12. Referring to Ex. SDG&E-14 workpaper page 388, provide a table that defines each number and phrase in the explanation sections (e.g. 7074306 and “missing in GRID”).

**SDG&E Response 12:**

As described in SDG&E’s response to question 8, an adjustment was made to 2015 and 2016 historical costs within the Electric Distribution Engineering Pool to account for internal order changes resulting from the implementation of a new time keeping system. The table below shows the new internal orders that were included in our adjustment because they were not captured within the GRID database.

<b>Internal Order Number</b>	<b>Description</b>
7074264	ENGINEERING - ELEC. DIST. CAPITAL
7074267	SERVICE PLANNER TRAINING CAPITAL
7074268	SERVICE DISPATCHING CAPITAL
7074306	ENGINEERING FIELD CHECK(ELECTR)
7074313	PROJECT MGT. METRO/NORTHERN CAPITAL
7074314	PROJECT MGT. ORANGE CTY. CAPITAL
7074315	SERVICE ORDER TEAM CAPITAL
7074317	C&O CENTER PLANNERS CAPITAL
7074318	DISTRIBUTION WORKLOAD PLANNING CAPITAL
7074320	ETOS MANAGEMENT
7074321	ETOS OPERATORS
7074347	SDGE DOH DISTRIBUTION ELECTRIC

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13. Referring to the “RefID” code on Ex. SDG&E-14 workpaper page 388, describe in lay terms all information contained within the RefID” code. A hypothetical response could be “for the 2017 adjustment, John Smith made the adjustment on May 1, 2017 based on engineering judgement and data from the XYZ database.”

**SDG&E Response 13:**

Please see SDG&E’s response to question 4.

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14. Referring to Ex. SDG&E-14 workpaper page 394:
- a. Provide an Excel worksheet version of this table with all formulas and links active. If it is not possible to provide a suite of files with links that work, disable the links in a separate file. To clarify, if the spreadsheet used by SDG&E includes links to other files, provide all files such that the links are functional, or provide two sets of files: a) the original file which will not calculate due to invalid links, and b) a version of the file with links inactivated. If the numbers were not calculated in Excel, explain how they were calculated.
  - b. If not provided in the spreadsheet provided in response to subpart a, explain how the values tabulated for Step 1a were derived, and show this derivation relative to the values in Table AFC-4 on Page AFC-18 of Ex. SDG&E-14.
  - c. If not provided in the spreadsheet provided in response to subpart a, explain how the values tabulated for Step 1b were derived, and provide an Excel spreadsheet with annual values for each budget code that was excluded.
  - d. In the table provided in response to subpart c above, provide a description of the work included in each budget code listed.
  - e. If not provided in the spreadsheet provided in response to subpart a, explain how the values tabulated for Step 2 were derived, and provide an Excel spreadsheet showing the derivation for each annual value.

**SDG&E Response 14:**

Please refer to the Excel file “ORA-SDGE-025-TCR-OH Pools Supporting Tables.XLSX” provided with the response to DR ORA-SDGE-025-TCR for detailed calculations supporting SDG&E’s funding request for the Electric Distribution Engineering Pool.

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15. Provide a history of budget code 901 that includes the following:
- a. When the code was first opened,
  - b. When the code was first used,
  - c. Annual recorded expenditures from SAP, unadjusted, for each year expenditures were recorded to this budget code,
  - d. Any and all changes in the scope of work included in this budget code. Describe each change and when it occurred. As a hypothetical example, “in March 2003, work on communications systems that tied back to a substation was transferred from budget code 901 to budget code 904.”

**SDG&E Response 15:**

Budget code 901 has existed for many years prior to the filing of this GRC application. In conformance to the requirements to provide 5 years of historical data with this application, the unadjusted historical costs from SAP can be found in the workpapers to this budget code in exhibit SDG&E-014-CWP. Changes in scope for this period are described in any adjustments shown in those workpapers.

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16. List all budget or other accounting codes that aggregate to get the tabular recorded values for budget code 901 provided on Ex. SDG&E-14 workpaper page 387.

**SDG&E Response 16:**

As described in SDG&E's response to question 2, the Electric Distribution Engineering Pool includes engineering work associated with FERC accounts 108, 364-373 and 397.

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17. Please explain why overhead pool expenditures are classified and treated as capital expenditures rather than O&M expenses.

**SDG&E Response 17:**

The Code of Federal Regulations, “Electric Plant Instructions, section 4-A” states that “All overhead construction costs, such as engineering, supervision, general office salaries and expenses, construction engineering and supervision by others than the accounting utility, law expenses, insurance, injuries and damages, relief and pensions, taxes and interest, shall be charged to particular jobs or units on the basis of the amounts of such overheads reasonably applicable thereto, to the end that each job or unit shall bear its equitable proportion of such costs and that the entire cost of the unit, both direct and overhead, shall be deducted from the plant accounts at the time the property is retired.” Consistent with the above regulation, overhead pool expenditures associated with construction of electric distribution and substation assets are being classified and treated as capital.

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18. How are overhead pool expenditures entered into ratebase? For example, is there a category of ratebase for overhead pools? If so, when is the work performed considered “used and useful?”

**SDG&E Response 18:**

No, there is not a separate category of ratebase for overhead pools. These costs are allocated to specific projects and are entered into ratebase once that asset becomes used and useful.

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19. If overhead pool expenditures are not entered into ratebase separately, how are these costs allocated or attributed to actual projects or other categories of ratebase?

**SDG&E Response 19:**

Overhead pool costs are allocated to capital projects based on a percentage rate that is determined by dividing pool costs over applicable capital expenditures. As stated above, total project costs, including allocated overhead charges, are then placed into ratebase once the assets become used and useful.

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20. Where SDG&E has provided the recorded expenditures for specific projects in Ex. SDG&E-14, do the values provided generally include expenditures for budget code 901?

**SDG&E Response 20:**

No, only direct costs are included in the recorded expenditures for specific projects.

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21. For the project listed in Question 1 above, has do the recorded expenditure values provided include expenditures for budget code 901?

**SDG&E Response 21:**

No, please see SDG&E's response to question 20.

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22. Does SDG&E have the ability to provide the recorded expenditures for specific projects in Ex. SDG&E-14 that include expenditures for budget code 901? If not, please explain.

**SDG&E Response 22:**

Yes, SDG&E is able to provide fully loaded project costs that include electric distribution engineering loaders, although this would be a time-consuming effort based on the nature and count of projects involved.

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23. Explain how overhead pool expenditures are or can be allocated to specific projects or programs.

**SDG&E Response 23:**

Please see SDG&E's response to question 19.

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24. Referring to Ex. SDG&E-14 workpaper page 382, provide a high level explanation of how non-labor expenditures are differentiated from labor expenditures.

**SDG&E Response 24:**

Labor expenditures represent costs charged by internal SDG&E employees for hours worked.

Non-labor expenditures include all charges outside of internal labor, such as contracted work, materials and services charged to projects.

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25. Referring to Ex. SDG&E-14 workpaper page 382, provide a list of the types of work, services, materials, or other expenditures included in the labor values, including the budget codes if applicable.

**SDG&E Response 25:**

As described in SDG&E's response to question 24, only costs charged by internal SDG&E employees for hours worked are included in the labor values.

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26. Referring to Ex. SDG&E-14 workpaper page 382, provide a list of the types of work, services, materials, or other expenditures included in the non-labor values, including the budget codes if applicable.

**SDG&E Response 26:**

As described in SDG&E's response to question 24, non-labor expenditures include all charges other than internal labor, such as contracted work, materials and services charged to projects.

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27. If not addresses in the responses to previous questions, state whether contracted labor is included in labor or non-labor expenditure values. If the answer depends on the type of contracted labor, or the type of contract used, please explain.

**SDG&E Response 27:**

As described in SDG&E's response to question 24, contracted labor is included in the non-labor line item.

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28. List all SDG&E organizations that perform work tracked by, assigned to, or aggregated into budget code 901.

**SDG&E Response 28:**

Please refer to the Electric Distribution Engineering group in the Organization chart previously provided. While the employees in Electric Distribution Engineering are the source of most of the labor charged to Budget Code 901, there can be labor charges originating from temporary assignment by personnel from nearly any part of the company based on the need for additional skills or resources.

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29. If not provided in organization charts previous provided to ORA, provide an organization chart showing organization names, employee names, and head counts for all organizations provided in response to Question 28 above, and extend this chart up two levels in the organization. For example, in the organizations using budget code 901 reach up to the line manager level, provide information for all second-level managers and directors responsible for these organizations.

**SDG&E Response 29:**

SDG&E objects to provide the specific names of those individuals under Rule 10.1, on grounds that the request is intrusive and neither relevant to the subject matter involved in the pending proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows: The organization charts previously provided to ORA include the Electric Distribution Engineering Organization and associated boxes and position titles for each employee. Please see page 379 of the SDG&E Organization Charts file provided for the start of the Electric Transmission and Distribution Engineering segment of the company.

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30. Do any of the SDG&E personnel or subcontractors in the organizations provided in response to Question 28 above perform work for So Cal Gas, Sempra corporation, other Sempra companies, or any other company? If so, explain the situations in which this occurs, and how SDG&E ensures that only expenditures for SDG&E projects and programs are attributed to budget code 901.

**SDG&E Response 30:**

SDG&E objects to the request to the extent that it seeks information that is outside of SDG&E's knowledge and/or outside the scope of this proceeding. Subject to and without waiving this objection, SDG&E responds as follows: Personnel and contractors performing work within the Electric Distribution Engineering organization primarily support electric distribution projects. There are occasions when employees are temporarily assigned to assist in engineering work to support various other activities within SDG&E. However, in all instances the costs are tracked separately and are charged to the appropriate pool/project. SDG&E does not track the work performed by its contractors that may be performed for SoCalGas or other Sempra companies.

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31. Does the work included in the budget code 901 forecast apply only to electric distribution facilities that directly serve customers (e.g. current carrying conductors, poles, communication equipment, etc.), or are other engineering services also included in this budget code, for example support for operational decisions such as planning outages for maintenance, or design of SDG&E buildings, labs, and other facilities that support SDG&E staff? If so, please list the other types of work performed and provide an example, including specific project budget code and project data, for each type of work.

**SDG&E Response 31:**

Yes, budget 901 applies only to engineering, supervisory and/or support capacity for electric distribution facilities that directly serve customers. As stated in SDG&E's response to question 2, the Electric Distribution Engineering Pool includes work associated with construction of Electric Distribution assets.

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SDG&E 2019 GRC – A.17-10-007  
SDG&E RESPONSE**

**DATE RECEIVED: NOVEMBER 17, 2017**

**DATE RESPONDED: DECEMBER 6, 2017**

32. If budget code 901 is forecast based on a fixed rate, provide the annual rates for this GRC period and what they are applied to, including all conditions and exceptions. As a hypothetical example, “the 2019 forecast for budget code 901 is determined based on 10% of forecast construction expenditures for projects identified elsewhere in this [TY 2019] GRC application for projects with an in-service date of 2019.”

**SDG&E Response 32:**

As described in SDG&E’s response to question 5, the forecast for the Electric Distribution Engineering Pool is based on the historical relationship between overhead pools and capital expenditures, which is then applied to the forecasted increase in Electric Distribution capital work to determine the overhead pool funding request. Please refer to the Excel file “ORA-SDGE-025-TCR-OH Pools Supporting Tables.XLSX” provided with the response to DR ORA-SDGE-025-TCR.

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ORA-SDGE-022-TCR  
SDG&E 2019 GRC – A.17-10-007  
SDG&E RESPONSE**

**DATE RECEIVED: NOVEMBER 17, 2017**

**DATE RESPONDED: DECEMBER 6, 2017**

33. If budget code 901 forecasts have historically been based on a fixed rate, provide the annual rates and what they were applied to for the last ten years, including all conditions and exceptions. As a hypothetical example, “from 2005 to 2010 the forecast for budget code 901 was determined based on 10% of forecast construction expenditures for projects identified elsewhere in the applicable GRC application.”

**SDG&E Response 33:**

Please see SDG&E’s response to question 32.