

TURN DATA REQUEST
TURN-SDG&E-DR-09
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: APRIL 13, 2015
DATE RESPONDED: APRIL 28, 2015

1. At SDG&E-16, p. 8, SDG&E states that it plans to buy alternative fueled vehicles at a premium to achieve the 90% annual requirement under the EPAct.
 - a. Please describe in detail the analysis SDG&E performed to compare the costs and benefits of buying alternative fueled vehicles rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.
 - b. Please describe in detail the analysis SDG&E performed to compare the costs and benefits of purchasing EPAct credits rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.

SDG&E Response:

- a. SDG&E did not conduct any such analysis. Additionally, in line with California state initiatives to reduce GHG, SDG&E is supporting this initiative to grow its alternative fueled vehicle fleet by replacing traditional gas and diesel vehicles.
- b. SDG&E did not conduct any such analysis.

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2. At SDG&E-16, pp. 3 and 10, SDG&E states that the Vehicle Servicing & Repairs costs include costs for retrofitting the SDG&E fleet of over-the-road vehicles with backup cameras and backup sensors to try to help prevent the number of backup incidents.
- a. Please confirm that the costs in Vehicle Servicing & Repairs are for SDG&E’s existing fleet of over-the-road vehicles, and are in addition to the costs of having backup cameras or backup sensors installed in new vehicles.
 - b. For each year from 2009-2014, inclusive, please state the number of backup incidents that occurred with the SDG&E fleet of over-the-road vehicles. Please describe the five most common types of backup incidents, and provide the number of incidents of each type in each year.
 - c. For each year from 2009-2014, inclusive, please state the amount of claims paid out by SDG&E due to backup incidents involving the SDG&E fleet of over-the-road vehicles.
 - d. For each year from 2009-2014, inclusive, please briefly describe the five most common costs incurred by SDG&E due to backup incidents involving the SDG&E fleet of over-the-road vehicles, and the amount of each such cost.

SDG&E Response:

- a. The costs for Vehicle Servicing & Repairs are for SDG&E’s existing fleet of over-the-road vehicles, which are in addition to the costs of having backup cameras or backup sensors installed in new vehicles.
- b. There are two types of backup incidents: (1) Hit moving vehicle while backing and (2) Hit stationary object-backing. The numbers are stated below.

Motor Vehicle Incident Event type/Calendar year	2009	2010	2011	2012	2013	2014	Overall Result
Hit moving vehicle while backing	4	1	0	2	2	4	13
Hit stationary object-backing	9	14	27	13	16	16	95
Overall Result	13	15	27	15	18	20	108

- c. Fleet does not provide or collect this information.
- d. Fleet does not provide or collect this information.

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3. At SDG&E-16, page 8, in Table CLH-4, SDG&E lists year-end 2013 figures for vehicle types in seven different categories. Please provide the year-end figures for 2008-12 and 2014 for each category of vehicle.

SDG&E Response:

VEHICLE TYPES	2009	2010	2011	2012	2013	2014
Automobiles	172	145	107	106	105	106
Compact Trucks and Vans	631	542	508	482	453	406
Light Duty Trucks and Vans	548	523	593	609	717	711
Medium Duty Trucks and Vans	348	331	321	322	371	349
Heavy Duty Trucks and Vans	241	229	221	220	234	226
Trailers	241	237	227	235	241	251
Construction Equipment	74	65	98	97	101	101
TOTAL	2,255	2,072	2,075	2,071	2,222	2,150

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4. In the workpapers SDGE-16-WP, page 11, the “Incremental Fleet for Business Needs” lists the number of vehicles forecasted for each of six SDG&E Organizations. For each of the five SDG&E Organizations:
 - a. For each year from 2009-2013 please state the number of FTEs and the number of fleet units.
 - b. For 2014, please state the number of incremental fleet units actually leased.

SDG&E Response:

- a. SDG&E does not maintain vehicle amortization historical costs or FTEs by organizational assignment.
- b. All acquired units are leased. There were no “Incremental Fleet for Business Needs” acquired in 2014.

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5. At SDG&E-16, pages 5-6, SDG&E states, “In line with the goals set forth in the Governor’s Zero Emission Vehicle (“ZEV”) Action plan . . . , and California state initiatives and regional and multi-agency efforts seeking ozone reductions in the range of 70% to 80% in all sectors, SDG&E is supporting these initiatives to grow its electric and natural gas fleet by replacing and/or retrofitting traditional gas and diesel vehicles.” The testimony cites Ex. SDG&E-16-WP Amortization and supplemental for further detail.
- a. Other than the table for “AFV Incremental Costs” on page 12 of SDGE-16-WP, please identify by page number each place in SDGE-16-WP that provides further detail for the amortization costs associated with SDG&E’s initiative to grow its AFV fleet.
 - b. For each year from 2014-2016, inclusive, please state the number of AFVs reflected in the table for “AFV Incremental Costs” on page 12 of SDGE-16-WP, broken out into electric and natural gas vehicles. Please also state the number of AFVs actually obtained in 2014, broken out into electric and natural gas vehicles, and the associated recorded amortization cost.
 - c. For each year from 2009-13, please state the number of traditional gas and diesel vehicles SDG&E retrofitted to AFVs, and the associated cost.
 - d. For each year from 2009-13, please state the number of new AFVs SDG&E obtained through purchase or lease, and the associated cost.

SDG&E Response:

- a. The information is included in SDG&E-16-WP on pages 6 and 7.
- b. See the table below:

	2014	2015	2016
Natural Gas	0	10	37
Electric	0	15	75

2014	Count	Amortization
Electric	7	\$ 14,890
Natural Gas	-	\$ -

- c. See table below:

	2009	2010	2011	2012	2013
NGV Conversions	0	0	0	0	5
Amortization Costs	-	-	-	-	\$ 9,002

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Response to Question 5 (Continued)

d. See the table below:

	2009	2010	2011	2012	2013
AFVs Acquired	48	0	21	10	26
Amortization	\$ 174,908	\$ -	\$ 38,791	\$ 11,295	\$ 39,525

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6. In the workpapers SDGE-16-WP, page 27, SDG&E provides a Fleet Salvage Forecast Supplemental Workpaper.
 - a. For the 3-year average salvage value of \$3,500, please provide the three years of data for the number of salvage units and the total salvage value recorded.
 - b. For 2014, please provide the number of salvage units recorded and the total salvage value from those units.

SDG&E Response:

- a. These responses/materials are deemed Protected Materials, Submitted under the signed NDA in this proceeding.**

RESPONSE REMOVED DUE TO CONFIDENTIALITY

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7. In the workpapers SDGE-16-WP, page 44, SDG&E includes Forecast Adjustment Details to its Automotive Fuels forecast for 2014, 2015 and 2016 to reflect forecasts of additional vehicles in each of those years.
- a. For each year from 2014-2016, inclusive, of the number of additional vehicles listed in the workpaper, how many are expected to be AFV?
 - b. For each year from 2014-2016, how many vehicles in SDG&E's existing fleet does the utility expect to convert to AFVs?
 - c. When SDG&E uses either natural gas or electricity as a fuel for its fleet provided from the utility's own refueling facilities, is there a cost for the natural gas or electricity used as fuel? If so, please state the price SDG&E charges itself for natural gas or electricity used as a fuel for its fleet.

SDG&E Response:

- a. None of these vehicles are expected to be AFVs.
- b. SDG&E does not expect to convert any of its existing fleet to AFVs.
- c. No, there are no charges to Fleet for the cost of natural gas used as fuel.

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8. Regarding the Fleet Amortization Forecast Workpaper at p. 11 of SDGE-16-WP:
- a. Of the Fleet Replacements 2014 through 2016, for each year how many reflect replacement of a gasoline- or diesel-fueled vehicle with Alternative Fuel Vehicles (AFV)?
 - b. Please provide in Excel format the annual costs, recorded for each year 2009-2014 and forecasted for 2014-2016, for each line item in the Amortization table. Please also provide the annual costs for each year broken out into the following separate categories: Gas Distribution, Gas Transmission, Electric Distribution O&M, Customer Service Field, Customer Services – Office Operations, and Environmental.
 - c. Please provide in Excel format the number of units associated with each line in the Amortization table on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016. Please also provide the annual number of units for each year broken out into the following separate categories: Gas Distribution, Gas Transmission, Electric Distribution O&M, Customer Service Field, Customer Services – Office Operations, and Environmental.
 - d. Please separate the “New Fleet Units for Replacements” from the Fleet Replacements table into annual figures on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016, for the following separate categories: Gas Distribution, Gas Transmission, Electric Distribution O&M, Customer Service Field, Customer Services – Office Operations, and Environmental. Within each category, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.
 - e. For each of the SDG&E Organizations listed in the Incremental Fleet for Business Needs table, please provide the recorded fleet units on a recorded year-end basis for each year 2005-2014. Within each organization, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.

SDG&E Response:

- a. The category “Fleet Replacements” does not include AFVs.
- b. Please see the accompanying file SDGE-DR-09_Question 8b.xlsx. SDG&E does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. The historical amortization costs are included in SDG&E-16-WP on page 5.
- c. SDG&E does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. See answer to Question 3 for historical counts.
- d. SDG&E does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. See answer to Question 3 for historical counts.
- e. SDG&E does not maintain vehicle amortization historical costs by organizational assignment. Forecasts were developed by vehicle type and not by organization.

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9. Regarding the Fleet Amortization Forecast Workpaper at p. 11 of SDGE-16-WP:
- a. For the vehicle replacements SDG&E is forecasting, are any occurring earlier than they would otherwise in order accelerate adding AFVs to the utility's fleet?
 - b. If so, for each year from 2014-2016, inclusive, please indicate how many vehicles are forecast to be replaced (i.) one year, (ii.) two years, (iii.) three years, (iv.) four years, (v.) five or more years earlier than would occur absent adding AFVs to the utility's fleet.
 - c. What is SDG&E's understanding of what would happen to the vehicles that would be replaced on an accelerated schedule, if any? Would they be demolished? Sold? Something else? To whom would they be sold if selling is the likely course of action?

SDG&E Response:

- a. No.
- b. Not applicable.
- c. Not applicable.

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10. Regarding Table CLH-5 at SDG&E-15, page 9,
- a. Please provide a workpaper that shows the calculation of and assumptions used to arrive at the recorded and forecasted Automotive Fuels calculations, including (but not limited to) the number of cars, the cost of fuel (both spot and hedged), and fuel efficiency assumptions in the calculations.
 - b. What is the average fuel economy (miles/gallon) of SDG&E’s current fleet of road-based vehicles? What is SDG&E’s assumption about the average fuel economy (miles/gallon) of road-based vehicles in the Test Year? What does SDG&E base the fuel-economy values on? Does the Test Year assumption include any improvement for increased AFV counts? Why or why not?

SDG&E Response:

- a. The 3-year historical average was used for all vehicles and a fuel cost per vehicle was added to the 3-year historical average for all “Incremental Fleet for Business Needs” as specified in SDG&E-16-WP page 44.

The fuel cost per vehicle used for “Incremental Fleet for Business Needs” was calculated as follows:

2013 Test Year Fuel Purchases	= \$6,695 thousand
2013 Test Year Vehicle Count	= 2,222 total units
Cost per vehicle = \$6,695 thousand/2,222 units	= \$3.013 thousand

- b. SDG&E did not base any analysis on miles/gallon. The fuel forecast was based on a 3-year historical average, as specified in SDG&E-16-WP on pages 43 through 46. The Test Year assumption did not consider changes for increased AFV counts because the AFV vehicles will come in at the end of the 2015-2016 GRC periods and after, so the improvement in fuel will be more impactful after 2016.

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11. Regarding the Fleet Amortization Forecast Workpaper at p. 11 of SDGE-16-WP, and the “Incremental Fleet for Business Needs” showing 24 vehicles in the 2014-16 period for Field Services – CS Field and CS Operations – Meter Reading:
- a. Please provide specific documentation from SoCalGas’s AMI cost-benefit analysis and calculation of AMI benefits in \$/meter/month that demonstrates that employees in Customer Service Field and Customer Services- Office Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2016.
 - b. Please provide specific documentation from any AMI cost-benefit analysis that SDG&E performed to support its AMI applications or implementing advice letters that includes a calculation of AMI benefits in \$/meter/month that demonstrates that employees in Customer Service Field and Customer Services- Office Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2018.
 - c. Please identify by volume and page number where the explanation for the reasonableness of the forecast for Customer Service Field and Customer Services- Office Operations vehicle needs for 2014-16 is set forth in SDG&E’s GRC testimony and workpapers.

SDG&E Response:

Fleet receives requests for incremental new vehicles and is responsible for the cost estimates. The Fleet user is responsible for the business justification.

Prepared by Brad Baugh, Witness for SDG&E Customer Services – Office Operations

- a. 2013 represents the first full year of SDG&E’s post-Smart Meter/AMI deployment. Therefore, Customer Services – Office Operations did not include any new vehicles in its 2014-2016 forecast for employees replaced by Smart Meter/AMI.
- b. Not applicable.
- c. Not applicable.