

UCAN DATA REQUEST-08
SDG&E-SOCALGAS 2016 GRC – A.14-11-003-004
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: APRIL 24, 2015
DATE RESPONDED: MAY 8, 2015

The following questions relates to Ms. Hrna’s testimony for SDG&E (SDG&E-37)

1. Please provide all workpaper tables in Excel, with formulas and links (including links between tables) intact.

Utility Response:

Please see the attachment “UCAN-SEU-DR-08 Q1 Hrna Attachment.xlsx” for all workpaper tables in Excel, with formulas and links (including links between tables) intact.

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2. With regard to the recorded capital additions in Table 11 of the workpaper (Recorded & Forecasted Capital Additions by Function):
- a. For each year, please identify all spending amounts included in the table that relate to the acquisition of the Desert Star Energy Center (*nee* El Dorado Power Plant).
 - b. For each year, please identify all spending amounts included in the table for capital additions to the Desert Star Energy Center, separately identifying capital additions associated with the plant acquisition and capital additions unrelated to the acquisition (i.e., ongoing capital additions).
 - c. For each year, please identify all spending amounts included in the table that relate to the acquisition of the Cuyamaca Peak Energy Plant (*nee* El Cajon Energy Facility).
 - d. For each year, please identify all spending amounts included in the table for capital additions to the Cuyamaca Peak Energy Plant, separately identifying capital additions associated with the acquisition and capital additions unrelated to the acquisition (ongoing capital additions).
 - e. For each year, please identify all spending amounts included in the table that were authorized outside of a GRC proceeding. Please provide a description of the capital addition and specify the decision or resolution number authorizing the expenditure. Spending amounts related to the acquisition of the Desert Star Energy Center and the Cuyamaca Peak Energy Plant that were specified in response to subparts a-d of this question need not be repeated.
 - f. Please provide a modified version of this table that excludes all capital spending that was approved outside of a GRC proceeding, such as the acquisition of the Desert Star Energy Center and the acquisition of the Cuyamaca Peak Energy Plant. Please identify all items removed from the table for this modified version.

Utility Response:

Please see the attachment “UCAN-SEU-DR-08 Q2-3 Hrna Attachment.xlsx” for the requested data to questions 2a-e.

- f. SDG&E has not performed and does not have the requested analysis, which would be burdensome to perform and provide.

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3. With regard to the recorded 2014 capital additions provided in response to data request UCAN-002 Question 1, please identify any included capital additions that were approved outside of a GRC proceeding. Please describe the capital addition, provide its associated 2014 cost (in nominal dollars, 2013 dollars, and 2016 dollars), and specify the decision or resolution number authorizing the expenditure.

Utility Response:

Although this data is not part of SDG&E's forecasts or within the scope of this case, SDG&E has provided UCAN with 2014 recorded data in the spirit of cooperation and without waiving the right to contest or respond to how the data is used. Please see the attachment "UCAN-SEU-DR-08 Q2-3 Hrna Attachment.xlsx" for the requested data.

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The following questions relates to Mr. Van Der Leeden’s testimony for SoCalGas (SCG-35)

4. Please provide all workpaper tables in Excel, with formulas and links (including links between tables) intact.

Utility Response:

Please see the attached Excel file.

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5. With regard to Table 12 of the workpaper (Asset History by Asset Class):
- a. For each year, please identify all spending amounts included in the table that were authorized outside of a GRC proceeding. Please provide a description of the capital addition and specify the decision or resolution number authorizing the expenditure.
 - b. Please provide a modified version of this table that excludes all capital spending that was approved outside of a GRC proceeding. Please identify all items removed from the table for this modified version.

Utility Response:

- a. Costs associated with the Honor Rancho Expansion Project, were included in the capital additions because the project has been approved per D.14-06-007 of the SoCalGas' 2013 Triennial Cost Allocation Proceeding (TCAP). The capital additions associated with the Honor Rancho Expansion project are shown in the table below. There were no additions in 2009.

	Additions 2010	Additions 2011	Additions 2012	Additions 2013	Additions Total
HRSMA	\$3,432,984	\$32,310,562	\$1,656,454		\$37,400,000
HRSMA-Cushion Gas		1,063,906	1,226,295	738,372	3,028,573
HRCRMA			16,214,078	66,394	16,280,473
Total	\$3,432,984	\$33,374,468	\$19,096,827	\$804,766	\$56,709,046

- HRSMA – Honor Rancho Storage Memorandum Account – The original purpose of the HRSMA was to record the incremental costs and revenues associated with the Honor Rancho Expansion Project as filed in SoCalGas Application (A.) 09-07-014 and approved by Decision (D.) 10-04-034. Pursuant to D.14-06-007, SoCalGas' 2013 Triennial Cost Allocation Proceeding (TCAP), SoCalGas is authorized to include in rates a revenue requirement to recover all costs associated with the Honor Rancho Storage Expansion Project.
- HRCRMA - The HRCRMA is an interest bearing account reflected on SoCalGas' financial statements. The purpose of the HRCRMA is to record the incremental costs associated with the Honor Rancho Expansion Project that are in excess of the \$37.4 million cap approved by Decision (D.) 10-04-034.

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Response to Question 5 (Continued):

b. Please see table below which represents the table provided in the testimony of Ron M. Van der Leeden (SCG-35) updated to exclude additions related to the Honor Rancho Expansion project as shown in the response to Question 5a.

SCG-35-RMV Table 12 adjusted per UCAN-DR-008 Q5b

Asset Class Description	Additions 2009	Additions 2010	Additions 2011	Additions 2012	Additions 2013
Intangible	\$5,240	\$0	\$11,000	\$1,888	\$5,718
UGS	33,897,058	43,395,751	37,130,499	41,634,400	32,395,483
Transmission	91,403,097	55,360,174	110,067,840	113,688,935	101,493,195
Distribution	208,649,096	205,187,105	268,623,379	275,098,070	246,791,078
General Plant-Non Depreciable	-	99,818	-	-	-
General Plant-Buildings	7,897,914	5,802,500	36,722,948	26,014,732	3,017,044
General Plant Capital Tools	1,625,072	1,844,754	3,094,761	2,061,055	2,515,375
General Plant Communications	4,890,582	30,079,716	31,038,092	7,057,655	13,829,503
General Plant Miscellaneous	489,908	1,001,466	265,885	321,178	675,920
General Plant Computer HW & SW	54,628,382	128,888,720	88,964,232	139,183,601	181,255,916
Cushion Gas	-	-	-	-	-
	\$403,486,350	\$471,660,004	\$575,918,637	\$605,061,513	\$581,979,234

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6. With regard to the recorded 2014 capital additions provided in response to data request UCAN-002 Question 1, please identify any included capital additions that were approved outside of a GRC proceeding. Please describe the capital addition, provide its associated 2014 cost (in nominal dollars, 2013 dollars, and 2016 dollars), and specify the decision or resolution number authorizing the expenditure.

Utility Response:

Imbedded in the \$505,254,000 of capital additions shown in the response to UCAN-DR-02 Q1, there was \$1,936,291 of 2014 additions that were associated with the Honor Rancho Expansion Project, HRSMA-Cushion Gas. Please refer to the response for question 5a for the regulatory decision information. Additionally there was also \$405,446 of additions in 2014 which were associated with the Energy Data Request Memorandum Account (EDRMA) Decision D. 14-15-016.

	2014	2014 Honor Rancho	EDRMA
Additions (nominal \$)	505,254	1,936	405
Additions (2013\$)	498,398	1,910	400
Additions (2016\$)	522,171	2,001	419

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The following questions relates to Ms. Somerville’s testimony for SoCalGas (SCG-32)

Responses Prepared by Customer Services Field (SCG-10) and AMI Policy (SCG-39)

7. For each of 2013 and 2014, please provide the number of (i) service establishments and (ii) reconnections that were fielded orders and the number that were non-fielded orders.

Utility Response:

(i.) The following table provides the 2013 and 2014 customer service field order counts for order types that **may** require a service establishment charge (SEC). The orders are broken down by fielded and non-fielded. Prior to 2013, all turn on orders were fielded. Beginning in 2013, when advanced metering infrastructure (AMI) mass deployment began, where there is a turn on order at a residence where the meter that is active (on), if the meter has been retrofitted with an AMI module and is successfully communicating an automated meter read, the turn on order would not be fielded.

Please note that there is not a one-to-one relationship between turn on orders and SEC. SEC is not an order type; it is a condition of establishing service for new customers or current customers relocating to a new address. Not all turn on orders result in a SEC. For example, property owners of rental properties may enroll in the Continuous Service Agreement program, whereby if a tenant requests to close service at a rental property, the service will automatically be turned on in the property owners name (in lieu of closing the service) and will not be subject to a SEC.

Order Type	2013	2014	Fielded
Change of Account - Turn On (Not Entered)	786,953	557,331	Yes
Change of Account - Turn On (Not Entered)	29,157	312,538	No
Commercial/Industrial - Turn On (Entered)	31,780	29,292	Yes
Food Industry - Turn On (Entered)	3,103	3,118	Yes
Fumigation - Turn On	64,691	63,315	Yes
Meter Work (Capital) - Meter Set (PSI)	3,100	3,734	Yes
Meter Work (Capital) - Meter Set - Left Off	1,467	2,230	Yes
Meter Work (Capital) - Meter Set - Turn On	16,571	19,180	Yes
Meter Work (O&M) - Meter Reset - Left Off	566	517	Yes
Meter Work (O&M) - Meter Reset - Turn On	1,495	1,388	Yes
TurnOn/ShutOff - Turn On (Back On/Restore)	54,423	59,905	Yes
TurnOn/ShutOff - Turn On (Entered)	118,167	100,057	Yes
TurnOn/ShutOff - Turn On (PSI)	1,522	1,416	Yes
TurnOn/ShutOff - Turn On Entered (Gas On)	45,495	34,921	Yes
Total	1,158,490	1,188,942	

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Response to Question 7 (Continued)

(ii.) Please see the table below for the number of Non-Pay Turn On orders that were fielded in 2013 and 2014. A Non-Pay Turn On order is issued to re-establish service subsequent to a meter being turned off as a result of non-payment. All of these orders are fielded and require a field technician to physically turn the meter back on. The customer is charged a reconnection fee of \$16 for this service.

Order Type	2013	2014	Fielded
Non-Pay Turn On - Turn On	81,011	74,160	Yes

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8. Of the 2013 and 2014 fielded orders for (i) service establishment and (ii) reconnection, please specify the number in each year that were fielded on account of the customer's having opted-out of a smart meter and the number in each year that were fielded for other reasons. For example, other reasons might include that SoCalGas was unable to install a Smart Meter at that location, that the location was not eligible for a Smart Meter, or that the service requested requires a fielded visit for both Smart Meter and legacy meter customers.

Utility Response:

(i-ii.) The SEC and reconnect charge are fees that are separate and independent to Opt-Out. The examples identified in question 7 above have no relevance to Opt-Out nor are they conditions that would warrant a SEC or a reconnect fee. Please refer to the response to question 7 above for a description of the conditions that would result in a SEC or reconnect fee being charged.

SoCalGas' Opt-Out Program became effective on March 19, 2014 and was established for customers who do not want an advanced meter. The interim opt-out fees approved by the California Public Utilities Commission (CPUC) were consistent with those previously adopted for the other California Investor-Owned Utilities (IOUs).¹ SoCalGas' Advanced Meter Opt-Out Program interim fees for residential customers were as follows:

- Non-CARE Customers: Initial fee of \$75.00 and \$10.00/month ongoing cost;
- CARE Customers: Initial fee of \$10.00 and \$5.00/month ongoing cost.

On December 19, 2014, the Commission issued D.14-12-078 regarding the Smart Meter Opt Out Phase 2 proceeding; this decision reiterated approval of the interim opt-out fees and charges and adopted them as permanent opt-out fees and charges for residential customers for each of the California IOUs.

Additionally, to clarify SoCalGas' technology is different than that of many electric utilities' in that the meter is a standard mechanical (legacy) gas meter with a communication device, referred to as the Advanced Meter module, attached to the face of the mechanical meter. If a customer opted-out, an order would be issued to remove the Advanced Meter module from the mechanical meter and the facility would then be manually read.

¹ Decision (D.) 12-02-014 (Pacific Gas & Electric), D.12-04-018 (Southern California Edison), and D.12-04-019 (SDG&E).

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9. Please provide the cost of a service establishment when it is a fielded order and the cost when it is a non-fielded order.

Utility Response:

Based on analysis completed in 2010, the estimated cost of completing a fielded turn on order is \$71.73 (in 2013 dollars). This includes the cost of customer service field and other office operations that process the order from start to finish (e.g., customer contact center, billing, etc.) and applicable overheads. The estimated cost of completing a non-fielded turn on order is \$17.70 (in 2013 dollars). This cost was derived by subtracting the customer service field cost (including overheads) from the estimated cost of the fielded turn on order.

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10. Please provide the cost of a reconnection when it is a fielded order and the cost when it is a non-fielded order.

Utility Response:

All Non-Pay Turn On orders are fielded orders. Non-Pay Turn On orders result in a reconnection fee charge to the customer to re-establish service subsequent to a meter being turned off as a result of non-payment. The estimated cost for a customer service field technician to complete a Non-Pay Turn On order is \$33.73 (in 2013 dollars). This cost includes the customer service field technician's on premise time to complete the order, the drive time and the miscellaneous non-job time that is associated with the activity. The cost does **not** include non-labor, other office operation areas that handle the transaction as it gets issued and then processed for completion (e.g., customer contact center, billing, etc.) or other loaders such as vacation and sick time and overheads.

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11. Please provide the recorded and forecast number of Smart Meters and legacy meters in each of the years 2013-2018.

Utility Response:

To clarify, SoCalGas is not deploying Smart Meters but rather is deploying a natural gas communication module, referred to as an Advanced Meter module. SoCalGas either retrofits a meter or performs a meter replacement with a module attached to the meter. A retrofit is the application of an AMI communication module on an existing mechanical meter in the field; whereas a replacement is a mechanical meter with a module married to the meter at the meter manufacturer. Of the nearly 2.9 million meters advanced through 2014, SoCalGas has performed 2,051,788 retrofits.

In addition to retrofits, SoCalGas is also performing planned meter changes (PMCs) and routine meter changes (RMCs). In Decision (D.) 10-04-027, AMI was authorized funding to replace 650,000 “accelerated” PMCs. These accelerated PMCs are meters that would normally have been replaced in the 5 year period following AMI deployment (2018 through 2022) or approximately 130,000 accelerated PMCs each year. In conjunction with this, SoCalGas was authorized in test funding to replace a total of 180,000 size 1-3 meters, including 130,000 “current” year PMCs and 50,000 RMCs, annually in the test year (TY) 2012 GRC. For these PMCs and RMCs, the meter is replaced with a new meter with a module that has been married to it.

The table below illustrates the cumulative amount of Advanced Meters installed through year-end 2013 and 2014 and shows forecasted installs 2015 through 2017, when SoCalGas anticipated to complete installation deployment. However, please note that installation targets for 2015-2016 are subject to change.

2013	2014	2015	2016	2017	2018
1,127,389	2,877,639	~4,300,000	~5,700,000	~6,000,000	Not Applicable

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12. Please provide the current number of Smart Meter opt-outs for each major customer class.

Utility Response:

Through April 20, 2015, there are 8,694 opt-out customers. All opt-out customers at this time are within the residential customer class.

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13. Please explain why the SoCalGas service establishment charge (\$25) is so much higher than the SDG&E service establishment charge (currently \$15), and please explain the basis for this charge amount.

Utility Response:

There are multiple reasons why the SEC is different (higher in this case) than the SDG&E SEC. To establish a response to this question, SDG&E and SoCalGas reviewed what available history it had. SDG&E and SoCalGas found little available history to validate the basis of the fees that were established several years ago. SDG&E and SoCalGas found the following possible reasons for differing fees:

- The timing of when the fees were implemented, therefore the basis for the rates, would vary accordingly (labor rates and overhead rates in effect at the time the rates were established, for example). Key cost variables that may differ between the two utilities are drive time and on premise time (the time it takes to complete the order).

SoCalGas' SEC was raised from \$5.00 to \$25.00 in January 1994 as approved by the CPUC (Rule No. 10, Decision No. 93-12-043), to more accurately reflect the cost of the activities associated with establishing new service.

SDG&E's SEC, \$15 for electric service and \$15 for gas service date back to as far as January 1986 and July 1995 respectively.

See attached documents *UCAN Data Request-08_Q13_Attachment A.pdf* and *UCAN Data Request-08_Q13_Attachment B.pdf* for backup.

- The time associated with turning on a gas meter and electric meter varies.
- Pre Smart Meter implementation (when the fees were established), where a SDG&E customer has both electric and gas service established, the combined fee is \$30. In this case, there is only one trip to the premise required to turn on both the electric and gas service, therefore the basis for the fee (at the time it was established) likely took this into consideration. For simplicity and fairness, the \$30 combined fee was equally split between electric and gas service establishment.

Please note that SDG&E has proposed an increase in their SEC fee for the associated electric and gas *fielded* turn on orders from \$15 to \$25 to better align with the actual costs of providing the service. See witness Somerville's testimony, Exhibit SDG&E-34-R-A, page MAS-4, lines 2-5 and page MAS-14, lines 12-16.

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14. Please explain why the SoCalGas reconnection charge (\$16) is higher than the SDG&E reconnection charge (currently \$15), and please explain the basis for this charge amount.

Utility Response:

Please refer to the response to question 13 above. The difference between the two fees is nominal. For similar reasons as shown above, the variables that are used to derive the cost are different across the companies.

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15. Please provide a projection as to how SoCalGas' service establishment costs will fall in each year of the GRC period as the number of installed Smart Meters increases.

Utility Response:

As explained in the response to question 8 above, SoCalGas is installing an "Advanced Meter" module onto the face of the existing legacy meter. This is not the same technology as the electric "Smart Meter" where the electric legacy meter is replaced with a wireless Smart Meter.

SoCalGas' **cost** of turning on gas service as a result of advanced meter deployment will be reduced. SoCalGas' AMI business case² identified operating benefits associated with the reduction of some turn on orders that no longer need to be fielded.³ As shown in response to question 7 above, approximately ~342,000 total orders were not fielded in 2013 and 2014 as a result of AMI deployment. As explained in the testimony of AMI Policy witness Mr. Rene F. Garcia, AMI benefits and costs are being collected in rates through December 31, 2017, per Advice Letter (AL) 4110⁴, therefore to avoid any double counting, there are no AMI benefits or costs included in this GRC. Please see Mr. Garcia's testimony for additional details related to AMI treatment in the GRC (Exhibit SCG-39) and the projected benefit values post AMI deployment.

Regarding the charge to the customer to establish or re-establish service (SEC), as did SDG&E, SoCalGas will propose to reduce the SEC fee associated with non-fielded turn on orders in the next GRC, following full deployment of AMI.

² Approved in D.10-04-027

³ A. 08-09-023; direct testimony of Mark L. Serrano, Chapter III, pages III-32 through III-33

⁴ AL 4110 effective April 8, 2010

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16. Please provide a projection as to how SoCalGas' reconnection costs will fall in each year of the GRC period as the number of installed Smart Meters increases.

Utility Response:

Please refer to the response to Question 8 above for an explanation of the difference between "Advanced Meter" technology being installed by SoCalGas and electric "Smart Meter" technology.

Non-Pay Turn On orders are generated as a result of a customer's gas service being shut off at the meter. All Non-Pay Turn On orders are fielded. These order types, which result in a reconnection fee charge, are not impacted by gas AMI.

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17. Please provide SoCalGas' proposal to return the cost savings associated with non-fielded service establishments and reconnections to ratepayers, including citations to specific pages of testimony providing this proposal.

Utility Response:

Although not directly associated with service establishments and reconnections, SoCalGas ratepayers are receiving reductions in rates due to a decrease in fielded orders as recorded in the Advanced Metering Infrastructure Balancing Account ("AMIBA"). Advice Letter ("AL 4110"), effective April 8, 2010, established the AMIBA and made updates to the AMI revenue requirement to reflect the total costs and benefits as adopted in D.10-04-027. Total costs and benefits were to be included in rates beginning January 1, 2012 through December 31, 2017. In this GRC, SoCalGas requests authority to extend the AMIBA beyond project completion through post-test year ("PTY") 2018 or until the full Advanced Metering Infrastructure ("AMI") costs and benefits could be reflected in a subsequent GRC.

In SoCalGas' AMI business case, SoCalGas projected benefits associated to a reduction of certain order types are presented in the direct testimony of Mark L. Serrano, Application ("A.") 08-09-023.⁵

⁵ Direct Testimony of Mark L. Serrano, Chapter III, pages III-31 through III-34

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The following questions relates to Ms. Somerville’s testimony for SDG&E (SDGE-34)

18. The response to UCAN Data Request 1 Question 44 provides the number of fielded and non-fielded service establishments for 2013 and 2014. Of the fielded service establishments, please specify the number that were fielded on account of the customer’s having opted-out of a smart meter and the number that were fielded for other reasons. For example, other reasons might include that SDG&E was unable to install a Smart Meter at that location, that the location was not eligible for a Smart Meter, or that the service requested requires a fielded visit for both Smart Meter and legacy meter customers. Please answer separately for each year and for each customer type (i.e., electric versus gas).

Utility Response:

Please see the attachment “UCAN-SEU-DR-08 Q18 Attachment.xlsx” for the SEC Fee Fielded order types by year and by customer type.

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19. In response to UCAN Data Request 1 Question 46, the first row of the “Description” column includes the statement, “For TurnOn orders this would be primarily CSF.” Please explain what is meant by CSF.

Utility Response:

In response to UCAN Data Request 1 Question 46, the first row of the “Description” column included the statement, “For Turn-On orders this would be primarily CSF” as shown below. In this description, CSF stands for Customer Service Field.

Fee Type	Description
SORT	Order is completed by a field tech using the SORT Work Management System - For Turn On orders this would be primarily CSF .