

**FEA DATA REQUEST**  
**FEA-SDG&E-DR-01**  
**SDG&E 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
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***COST ESCALATION***

FEA-01-1. Workpapers. Please provide Exhibit No.SDG&E-39-WP in Microsoft Excel with all cell references and formulas intact.

**SDG&E Response 01-1:**

Response by Scott Wilder: Workpapers are attached here as five Excel files with all cell references and formulas intact. The files names are:

“FEA DR-01 Q 1(i).xlsx”

“FEA DR-01 Q 1(ii).xlsx”

“FEA DR-01 Q 1(iii).xlsx”

“FEA DR-01 Q 1(iv).xlsx”

“FEA DR-01 Q 1(v).xlsx”

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**FEA-01-2.** Escalation methodology. Refer to Exhibit SDG&E-39. Please identify all changes in the cost escalation methodology applied in the current case over the methodology used in the last GRC.

**SDG&E Response 01-2:**

Response by Scott Wilder: The 2019 GRC uses the same cost escalation methodology as was used in the 2016 GRC, with essentially no changes. Note that in the 2019 GRC, most escalation weightings were calculated using actual 2016 expenses (rather than actual 2013 expenses used in the 2016 GRC).

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FEA-01-3. Union contract escalations. Refer to Exhibit SDG&E-39-WP, page 1 of 5.

- a. State whether the union contract escalation rates of 3.0%, 3.25% and 3.25% in 2017, 2018 and 2019, respectively, have been approved.
- b. Provide supporting documentation for the union contract escalation rates of 3.0%, 3.25% and 3.25% in 2017, 2018 and 2019, respectively.

**SDG&E Response 01-3:**

- a. Yes, the union contract escalation rates of 3.0%, 3.25% and 3.25% in 2017, 2018 and 2019, respectively, have been approved—specifically in the labor agreement provided in part b.
- b. Attached as “FEA DR-01 Q 3b.pdf” is the labor agreement between SDG&E and Local Union 465 of the International Brotherhood of Electric Workers, approved in December 2015. Annual wage rates are shown in Exhibit A (pages 101 to 124 of the attached document), for wages effective September 1 of each of the years 2015 through 2018. Each 12-month wage period starting September 1 covers most of the following calendar year (e.g., the wages effective September 1, 2015 through August 31, 2016 cover eight months of 2016). For GRC annual escalation purposes, the wage percentage changes effective September 1 of each year are applied to labor escalation for the following calendar year. The wages shown in the labor agreement’s Exhibit A increase by 3.0% effective September 1, 2016 (for 2017), by 3.25% September 1, 2017 (for 2018), and by 3.25% September 1, 2018 (for 2019).

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***POST TEST YEAR MECHANISM***

FEA-01-4. Capital addition escalation. Refer to Exhibit SDG&E-43-R, page KJD-6 lines 13-17.

- a. Identify the annual capital additions for each year in the 2013-2019 seven-year period and the corresponding seven-year average.
- b. Identify the annual capital additions for each year in the 2015-2019 five-year period and the corresponding five-year average.

**SDG&E Response 01-4:**

Please refer to the workpapers of Ken Deremer (SDG&E-43-WP-R) for the annual capital additions for the 2015-2019 five-year period and the corresponding five-year average.<sup>1</sup> Capital additions for Electric Distribution, Electric Generation, and Gas Distribution can be found on pages 7, 9, and 11, respectively. For your convenience, we have summarized the results below. We have also included the additional actuals for 2013 and 2014 capital additions in order to calculate the hypothetical seven-year average.

*(\$ in Thousands)*

<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
\$ 557,301	\$ 583,970	\$ 724,525	\$ 641,704	\$ 988,189	\$ 1,047,392	\$ 1,312,261

**5 Year Average:** \$942,814

**7 Year Average:** \$836,477

However, as stated in Ken Deremer's testimony, SDG&E believes a five-year average of capital additions is more appropriate for the post-test year mechanism as it better captures the current utility business environment (SDG&E-43-R on page KJD-7).

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<sup>1</sup> As stated in the workpapers of Ken Deremer (p.4), plant additions for the post-test years are calculated using a five-year period of recorded (2015-2016) and forecasted (2017-2019) capital additions. In concurrence, the hypothetical seven-year average reflects recorded capital additions for 2013-2016, and forecasted capital additions for 2017-2019.

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FEA-01-5. Medical escalation. Refer to Exhibit SDG&E-43-R, page KJD-5 lines 23-24 and page KJD-6 lines 1-3. Please update the chart to reflect the actual 2017 renewal rates.

**SDG&E Response 01-5:**

SDG&E is not reforecasting its revenue requirement for the updated rates and therefore does not have the table requested available. Willis Towers Watson's actuarial forecast based on actual 2017 renewal rates is 2020 – 6.0%, 2021 – 5.5%, 2022 – 5.0%.

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FEA-01-06. Items excluded from PTY escalation. Refer to Exhibit SDG&E-43-R, page KJD-4, lines 19-20. Provide actual amounts for each of the following calendar years 2012, 2013, 2014, 2015, 2016 and 2017:

- a. Miscellaneous revenues
- b. Franchise fees
- c. Uncollectibles

**SDG&E Response 01-6:**

Please refer to the table below for the items requested. 2017 recorded data is not yet available.

<i>(\$ in Thousands)</i>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Miscellaneous Revenues	\$ 21,650	\$ 24,795	\$ 22,158	\$ 19,665	\$ 17,120
Franchise Fees	\$ 98,640	\$ 104,748	\$ 124,814	\$ 133,884	\$ 122,985
Uncollectibles	\$ 5,028	\$ 4,912	\$ 5,310	\$ 6,455	\$ 6,427

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FEA-01-7. PG&E PTY proposal. Did PG&E's PTY proposal include escalation of:

- a. Miscellaneous revenues
- b. Franchise fees
- c. Uncollectibles

If not, explain fully why not. If so, explain and show how those items were escalated.

**SDG&E Response 01-7:**

SDG&E objects to this request on grounds that it seeks information that is not within SDG&E's knowledge and possession and/or is publicly and equally available to FEA. Subject to and without waiving this objection, SDG&E states as follows: SDG&E was not involved in the preparation of PG&E's most recent GRC. Therefore, we are not familiar with the details of their post-test year exclusions.

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***REGULATORY ACCOUNTS***

FEA-01-8. Decisions. For each of the regulatory accounts discussed in Exhibit SDG&E- 41, please identify and provide the Decision or Resolution approving establishment of the account.

**SDG&E Response 01-8:**

The table below provides the requested information:

Line	Regulatory Account (SDG&E)	Authority to Establish	Establishing Advice Letter
1	AB802MA	AB802	2870-E/2463-G
2	AFVMA	D.13-11-002	2584-E
3	CCAIBA	D.04-12-046	1666-E
4	CSIPMA	D.06-08-028	1841-E
5	DIMPBA	D.13-05-010	2204-G
6	DTRBMA	ALJ Ruling <sup>1</sup>	2710-E/2366-G
7	EDRMA	D.14-05-016	2619-E/2307-G
8	FHPMA	D.09-08-029	2105-E
9	LIPBA	N/A <sup>2</sup>	N/A <sup>2</sup>
10	MMBA	D.14-03-021	2601-E/2292-G
11	NEMAMA	Resolution E-4610	2529-E-A
12	NERBA	D.13-05-010	2496-E/2205-G
13	NRSMA	D.08-02-034	1978-E
14	OMABA	N/A <sup>2</sup>	N/A <sup>2</sup>
15	PBA	D.04-12-015	1652-E/1502-G
16	PBOPBA	D.04-12-015	1652-E/1502-G
17	RDMA	D.14-06-036	2616-E/2305-G
18	RRMA	D.15-07-001	2769-E
19	RTEMMA	D.01-05-032	1331-E
20	SMOBA	D.14-12-078	2712-E/2369-G
21	SONGSBA	D.06-11-026	1851-E
22	TIMPBA	D.13-05-010	2204-G
23	TMA	D.16-06-054	2928-E-A/2496-G-A
24	TPCBA	N/A <sup>2</sup>	N/A <sup>2</sup>
25	TTBA	D.98-12-038	1141-E

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**SDG&E Response 01-8: -Continued**

- <sup>1</sup> Administrative Law Judge's Ruling on The Utility Reform Network's Motion to Establish Memorandum Accounts, dated January 15, 2015, Ruling Paragraph 2. Regarding SDG&E's 2016 Test Year application.
- <sup>2</sup> Account not yet established.

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FEA-01-9. Current Account Balance. a) For each of the regulatory accounts discussed in Exhibit SDG&E- 41, please provide the current account balance. b) For each regulatory account, please state through what date the account balance and transactions have been reviewed through the advice letter process.

**SDG&E Response 01-9:** a) The tables below provide each regulatory account that is discussed in Exhibit SDG&E-41 and the account balance through December 2017.

		2017
		December
		\$ Thousands
Balancing Account	Notes	(Over)/Under Collecte
AB802MA ELEC		(490)
AB802MA GAS		(231)
AFVMA ELEC		1,097
CCAIBA ELEC		-0-
CSIPMA ELEC		-0-
DIMPBA GAS		(1,233)
DTRBMA ELEC		-0-
DTRBMA GAS		-0-
EDRMA- ELEC		382
EDRMA- GAS		61
FHPMA ELEC		4,130
LIPBA ELEC	New Request	N/A
LIPBA GAS	New Request	N/A
MMBA ELEC		2,439
MMBA GAS		2,834
NEMAMA ELEC		372
NERBA ELEC		(68)
NERBA GAS		(70)
NRSMA ELEC		-0-

		2017
		December
		\$ Thousands
Balancing Account	Notes	(Over)/Under Collecte
OMABA ELEC	New Request	N/A
PBA ELEC		9,965
PBA GAS		4,115
PBOPBA ELEC		(1,264)
PBOPBA GAS		(496)
RDMA ELEC		65
RDMA GAS		28
RRMA ELEC		9,011
RTEMMA ELEC		-0-
SMOBA ELEC		619
SMOBA GAS		357
SONGSBA ELEC		-0-
TIMPBA GAS		3,462
TMA ELEC & GAS	Tracking Only	*(8,327)
TPCBA ELEC	New Request	N/A
TPCBA GAS	New Request	N/A

\* The current balance for the TMA shown in the table above was presented in Appendix B of Exhibit SDG&E-35-R (Revised Direct Testimony of Ragan Reeves). While various adjustments may be booked to the TMA periodically, recorded amounts are not booked to the TMA until after the tax return for SDG&E is filed for a given year.

b) The TIMPBA is the only account from Exhibit SDG&E-41 that has been reviewed through a separate advice letter process. Review period is from January 1, 2012 to December 31, 2015. SDG&E notes that many of the regulatory accounts addressed in Exhibit SDG&E-41 are not subject to further review through a separate advice letter process, but rather are subject to review in the GRC.

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FEA-01-10. Advice letters. For each regulatory account discussed in Exhibit SDG&E- 41, please provide a copy of the most recent advice letter filing.

**SDG&E Response 01-10:**

See separately attached file *FEA\_DR-01Q10\_RecentAL.pdf* for copies of ALs listed below.

Line	Regulatory Account (SDG&E)	Name	Recent Advice Letter Filings
1	AB802MA	Assembly Bill 802 Memorandum Account	2870-E/2463-G
2	AFVMA	Alternative Fuel Vehicle Memorandum Account	2584-E
3	CCAIBA	Community Choice Aggregation Implementation Balancing Account	1820-E
4	CSIPMA	California Solar Initiative Performance-Based Incentive MA	1841-E
5	DIMPBA	Post2011 Distribution Integrity Management Program	2934-E/2499-G
6	DTRBMA	Deductible Tax Repairs Benefits Memorandum Account	2710-E/2366-G
7	EDRMA	Energy Data Request Memorandum Account	2619-E/2307-G
8	FHPMA	Fire Hazard Prevention Memorandum Account	2752-E
9	LIPBA	Liability Insurance Premiums Balancing Account	N/A
10	MMBA	Master Meter Balancing Account	3057-E/2563-G 3057-E-A/2563-G-A
11	NEMAMA	Net Energy Metering Aggregation Memorandum Account	2529-E-A
12	NERBA	New Environmental Regulatory Balancing Account	Same as Line 5 (electric) 2635-G (gas)
13	NRSMA	Non-Residential Submetering Memorandum Account	1978-E
14	OMABA	Otay Mesa Acquisition Balancing Account	N/A
15	PBA	Pension Balancing Account	3161-E/2634-G
16	PBOPBA	Post-Retirement Benefits Other Than Pensions	Same as Line 15
17	RDMA	Residential Disconnect Memorandum Account	2616-E/2305-G
18	RRMA	Rate Reform Memorandum Account	2769-E
19	RTEMMA	Real Time Energy Metering Memorandum Account	Same as Line 3
20	SMOBA	Smart Meter Opt-Out Balancing Account	2832-E/2441-G
21	SONGSBA	San Onofre Nuclear Generation O&M Balancing Account	Same as Line 5
22	TIMPBA	Transmission Integrity Management Program Balancing	2597-G
23	TMA	Tax Memorandum Account	2928-E-A/2496-G-A
24	TPCBA	Third-Party Claims Balancing Account	N/A
25	TTBA	Tree Trimming Balancing Account	Same as Line 5

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FEA-01-11. Account detail. For each regulatory account discussed in Exhibit SDG&E- 41 that has a balance, please provide the account transaction detail in Microsoft Excel for the last three calendar years through 2017.

**SDG&E Response 01-11:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense, and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. The large volume of files requested would be burdensome to research, select, save, and present in Excel format. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

See separately attached files in Adobe portable document format:

*FEA\_DR-01Q11\_2015Pages.pdf*

*FEA\_DR-01Q11\_2016Pages.pdf*

*FEA\_DR-01Q11\_2017Pages.pdf*

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FEA-01-12. Account balance. Provide the current account balance for each regulatory account discussed in Exhibit SDG&E- 41.

**SDG&E Response 01-12:**

Refer to SDG&E's response to Question FEA-01-9 above.

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FEA-01-13. Accounts to close. Refer to Exhibit SDG&E- 41, pages NGJ-1 through NGJ-4. For each of the following regulatory accounts, please explain why the Company wishes to close the account:

- a. Assembly Bill 802 Memorandum Account (AB802MA)
- b. Alternative Fuel Vehicle Memorandum Account (AFVMA)
- c. Deductible Tax Repairs Benefits Memorandum Account (DTRBMA)
- d. Energy Data Request Memorandum Account (EDRMA)
- e. Smart Meter Opt Out Balancing Account (SMOBA)
- f. Residential Disconnect Memorandum Account (RDMA)

**SDG&E Response 01-13:**

- a. Assembly Bill 802 Memorandum Account (AB802MA)  
Once the balance is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.
- b. Alternative Fuel Vehicle Memorandum Account (AFVMA)  
Once the balance is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.
- c. Deductible Tax Repairs Benefits Memorandum Account (DTRBMA)  
Once the residual balance, if any, is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.
- d. Energy Data Request Memorandum Account (EDRMA)  
Once the balance is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.
- e. Smart Meter Opt Out Balancing Account (SMOBA)  
Once the balance is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.
- f. Residential Disconnect Memorandum Account (RDMA)  
Once the balance is transferred (as requested in Exhibit SDG&E-41) there will no longer be a need for this account.

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FEA-01-14. Modified accounts. Refer to Exhibit SDG&E- 41, pages NGJ-7 through NGJ-12. For each of the following regulatory accounts the company proposes to modify, please explain why the Company is proposing the modification.

- a. Net Energy Metering Aggregation Memorandum Account (NEMAMA)
- b. Transmission Integrity Management Program Balancing Account (TIMPBA)
- c. Post-2011 Distribution Integrity Management Program Balancing Account (DIMPBA)
- d. Tree-Trimming Balancing Account (TTBA)

**SDG&E Response 01-14:**

- a. Net Energy Metering Aggregation Memorandum Account (NEMAMA)  
Modification as addressed in Exhibit SDG&E-41 will clarify the disposition of the account so that it states that the balance of the account will be addressed in the General Rate Case proceeding.
- b. Transmission Integrity Management Program Balancing Account (TIMPBA)  
Modification to change the current calculation for computing the dollar amount threshold for filing a separate cost recovery application will address the capital costs compounding effects of the GRC cycle that do not exist when compared to the balancing of annual O&M expenses. A detailed explanation is provided in Exhibit SDG&E-41 at pages NGJ-7 through NGJ-12.
- c. Post-2011 Distribution Integrity Management Program Balancing Account (DIMPBA)  
Same proposed modification and rationale as described for the TIMPBA in the response to part b of this question.
- d. Tree-Trimming Balancing Account (TTBA)

Modification from a one-way to a two-way balancing account is requested based on the discussion included in the revised testimony of witness William Speer (Exhibit SDG&E-15-R starting at p. WHS-67).

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FEA-01-15. Other regulatory accounts. Refer to Exhibit SDG&E- 41, page NGJ-14. State whether the Company is proposing to close or keep open the following accounts and the reason:

- a. Master Meter Balancing Account (MMBA)
- b. Tax Memorandum Account (TMA)

**SDG&E Response 01-15:**

- a. Master Meter Balancing Account (MMBA)  
Keep open. This account is discussed in Exhibit SDG&E-41 at page NGJ-14.
- b. Tax Memorandum Account (TMA)  
Close/ eliminate. Refer to Regan Reeves' revised direct testimony (Exhibit SDG&E-35-R) at page RGR-29 (lines 2-4).

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FEA-01-16. TIMPA. Refer to Exhibit SDG&E- 41, page NGJ-10 Table NJ-2. Provide a similar table with actual amounts for the following calendar years: 2013, 2014, 2015, 2016 and 2017.

**SDG&E Response 01-16:**

As noted in Exhibit SDG&E-41 at page NGJ-9 line 20 and in the title of Table NJ-2, SDG&E provided an illustrative example to explain the capital compounding issue. The assumption in Table NJ-2 is that plant additions are the same from year to year, within a GRC cycle.

SDG&E is providing the tables below based on FEA’s request with a full representation of the GRC TY 2012 (2012-2015) and current GRC TY 2016.

Period	Plant Additions	Plant Balance	Actual Capital Rev Req*					Authorized Capital Rev	Difference	
			2012	2013	2014	2015	Total		\$	%
2012	\$ 8.300	\$ 8.300	\$ 0.146				\$ 0.146	\$ 0.058	0.088	152%
2013	\$ 18.799	\$ 27.099	\$ 0.219	\$ 1.689			\$ 1.908	0.056	1.852	3307%
2014	\$ 11.894	\$ 38.993	\$ 0.219	\$ 1.689	\$ 2.145		\$ 4.053	0.058	3.995	6888%
2015	\$ 23.166	\$ 62.159	\$ 0.219	\$ 1.689	\$ 2.145	\$ 1.039	\$ 5.092	0.060	5.032	8387%
<b>Total</b>	<b>\$ 62.159</b>	<b>\$ 62.159</b>	<b>\$ 0.803</b>	<b>\$ 5.067</b>	<b>\$ 4.290</b>	<b>\$ 1.039</b>	<b>\$ 11.199</b>	<b>\$ 0.232</b>	<b>10.967</b>	<b>4727%</b>
Period	Plant Additions	Plant Balance	Actual Capital Rev Req*				Total	Authorized Capital Rev	Difference	
			2016	2017					\$	%
2016	\$ 1.532	\$ 1.532	\$ 0.084				\$ 0.084	\$ 0.141	(0.057)	-40%
2017	\$ 1.675	\$ 3.207	\$ 0.126	\$ 0.137			\$ 0.262	\$ 0.146	0.116	80%
<b>Total</b>	<b>\$ 3.207</b>	<b>\$ 3.207</b>	<b>\$ 0.210</b>	<b>\$ 0.137</b>			<b>\$ 0.346</b>	<b>\$ 0.287</b>	<b>0.059</b>	<b>21%</b>
\$ In Millions										
* Year-to-year costs are estimates since SDG&E records capital related costs based on cumulative plant additions										

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FEA-01-17. TIMPA. Refer to Exhibit SDG&E- 41, page NGJ-12 Table NJ-4. Please provide a similar table containing the revenues, expenses, interest, transfers and balance for the TIMPBA for the same time periods.

**SDG&E Response 01-17:**

Please see requested table below.

<b>Summary of TIMPBA Activity</b>					
<b>Year</b>	<b>Revenues</b>	<b>Expenses</b>	<b>Interest</b>	<b>Transfers</b>	<b>Account Balance</b>
2013	(7,522,435)	5,025,680	(1,433)		\$ (2,498,188)
2014	(7,790,000)	11,278,127	835		\$ 990,774
2015	(8,005,000)	9,811,791	2,986		\$ 2,800,551
2016	(5,809,000)	6,978,207	14,773		\$ 3,984,531
Jan - Jun 2017	(3,006,000)	3,563,235	16,999		\$ 4,558,765

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NEW REGULATORY ACCOUNTS

FEA-01-18. Otay Mesa Acquisition Balancing Account (OMABA). Identify all other California Utilities that currently have a similar one-way or two-way balancing account to record revenues until the utility takes ownership of a facility and include the Decision number in which the balancing account was approved.

**SDG&E Response 01-18:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require SDG&E to search files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
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**DATE RECEIVED: FEBRUARY 20, 2018**  
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FEA-01-19. OMABA. Identify all other California Utilities that requested a similar account that was not approved by the Commission. Please include the Decision number denying the balancing account.

**SDG&E Response 01-19:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require SDG&E to search files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

As stated in SDG&E's response to Question FEA-01-18, SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
**FEA-SDG&E-DR-01**  
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**SDG&E RESPONSE**  
**DATE RECEIVED: FEBRUARY 20, 2018**  
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FEA-01-20. Third-Party Claims Balancing Account. (TPCBA). Identify all other California Utilities that currently have a similar balancing account for third-party claims expense and include the Decision number in which the balancing account was approved.

**SDG&E Response 01-20:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require SDG&E to search files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Consistent with SDG&E's responses to Question FEA-01-18 and FEA-01-19, SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
**FEA-SDG&E-DR-01**  
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**SDG&E RESPONSE**  
**DATE RECEIVED: FEBRUARY 20, 2018**  
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FEA-01-21. TPCBA. Identify all other California Utilities that requested a one-way or two-way balancing account for third party claims expense that was not approved by the Commission. Include the Decision number denying the balancing.

**SDG&E Response 01-21:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require SDG&E to search files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Consistent with SDG&E's responses to Question FEA-01-18 through FEA-01-20, SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
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**DATE RECEIVED: FEBRUARY 20, 2018**  
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FEA-01-22. Liability Insurance Premium Balancing Account (LIPBA). Identify all other California Utilities that currently have a one-way or two- way balancing account for insurance expense and include the Decision number in which the balancing account was approved.

**SDG&E Response 01-22:**

SDG&E objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require SDG&E to search files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Consistent with SDG&E’s responses to Question FEA-01-18 through FEA-01-21, SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
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FEA-01-23. LIPBA. Identify all other California Utilities that requested a one-way or two-way balancing account for insurance expense that was not approved by the Commission. Include the Decision number denying the balancing account.

**SDG&E Response 01-23:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that this request is vague and ambiguous, seeks information that falls outside the scope of the case and would be unduly burdensome to produce, and/or would require the Companies to search their files for matters of public record in regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.), as this information is equally available to FEA. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Consistent with SDG&E's responses to Question FEA-01-18 through FEA-01-22, SDG&E independently developed this regulatory account request and did not research regulatory accounts for any other California utility.

**FEA DATA REQUEST**  
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**RATE BASE**

FEA-01-24. Workpapers. Please provide Exhibit No.SDG&E-33-WP-R in Microsoft Excel with all cell references and formulas intact.

**SDG&E Response 01-24:**

Please see the attached documents: “FEA-DR-01 Q24 part 1.xlsx” and “FEA-DR-01 Q24 part 2.xlsx.”

“FEA-DR-01 Q24 part 1.xlsx” contains references to SDG&E’s Results of Operation (RO) Model. The RO Model, which **contains confidential and protected material pursuant to P.U. Code Section 583, GO 66-D, D.17-09-023, and the non-disclosure agreement with FEA**, will be provided to supplement the references in “FEA-DR-01 Q24 part 1.xlsx.”

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**DATE RECEIVED: FEBRUARY 20, 2018**  
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FEA-01-25. Customer deposits. Refer to Exhibit SDG&E- 33-R, Table SDGE-RCG-2.

- a. Please explain why the Company has not reflected customer deposits as a reduction to rate base on this schedule.
- b. Please provide the 13-month average balance of SDG&E customer deposits for each of the calendar years: 2012, 2013, 2014, 2015, 2016 and 2017.

**SDG&E Response 01-25:**

- a. Please refer to Exhibit SDG&E-33-R at page RCG-7, Line 7 of Table SDGE-RCG-2 for the amount of electric customer advances for construction (CAC), which is shown as a reduction to rate base. Gas CAC is reflected in Exhibit SDG&E-33-R at page RCG-14, Line 8 of Table SDGE-RCG-7 as a reduction to rate base.
- b. Please refer to attachment “FEA-DR-01 Q25b.xlsx,” for the monthly amount of CAC Electric and Gas for 2012-2017, plus the requested 13-month average balance. The CAC balances include the receipts of cash advances, which are recorded as increases (Credits), and refunds and/or forfeitures of cash advances, which are recorded as decreases (Debits).

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FEA-01-26. Tax Law changes. Refer to Exhibit SDG&E- 33-R, Table SDGE-RCG-2. Please update this chart to reflect the effects of the Tax Cuts and Jobs Act signed on December 22, 2017. Provide supporting calculations and workpapers.

**SDG&E Response 01-26:**

On December 22, 2017, the Tax Cuts and Jobs Act (Tax Act) was enacted into law. The Tax Act represents the first major overhaul of the federal tax code in over 30 years. At the January 10, 2018 prehearing conference for our Test Year 2019 General Rate Case (GRC), SDG&E agreed to provide supplemental tax testimony by April 6, 2018, which will reflect the Tax Act's impact. SDG&E is in the process of analyzing the legislation in preparation of the supplemental tax testimony. Therefore, SDG&E requests that questions related to the Tax Act be propounded after SDG&E has served the supplemental tax testimony.

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FEA-01-27. Working Capital Workpapers. Provide Exhibit No. SDG&E-36-WP-R in Microsoft Excel with all formulas and cell references intact.

**SDG&E Response 01-27:**

Please refer to SDG&E-36-WP-R\_Dais\_Working\_Cash Confidential Q27.xlsx. This attachment is considered **Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C/D, and D.16-08-024.**

**FEA DATA REQUEST**  
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FEA-01-28. Working Capital. Refer to Exhibit No. SDG&E-36-WP-R. Identify any changes in the methodology of the working cash calculation over the working cash calculation approved in the last rate case (e.g., including, but not limited to, inclusion or exclusion of components comprising the working cash request, changes in the method of calculating the lead/lag days, etc.)

**SDG&E Response 01-28:**

SDG&E has not made or proposed any changes in methodology from the 2016 GRC. Consistent with the 2016 GRC, SDG&E derived its 2019 GRC working cash request from a combination of 2016 recorded data (with attrition) and forecast data.

New for the 2019 GRC:

- 1) As requested for the 2019 GRC, SDG&E has isolated Generation commodity and non-commodity expenses separately. In the 2016 GRC, these costs were included with Electric Distribution commodity and non-commodity expenses.
- 2) SDG&E has also included prepayments for Greenhouse Gas (GHG) emission credits.

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FEA-01-29. Working Capital-Cash balances. Refer to Exhibit No. SDG&E-36-WP-R, Schedule P-1. Provide the monthly balances for each of the two accounts shown for each of the years 2013, 2014, 2015, 2016 and 2017.

**SDG&E Response 01-29:**

	<b>2013</b>		<b>2014</b>		<b>2015</b>	
	<b>Union Bank</b>	<b>Mellon Bank</b>	<b>Union Bank</b>	<b>Mellon Bank</b>	<b>Union Bank</b>	<b>Mellon Bank</b>
<b>Jan</b>	1,200,208	1,247,670	1,905,689	1,567,021	1,936,962	1,861,971
<b>Feb</b>	1,813,694	1,445,261	4,525,137	1,486,006	1,654,173	1,888,677
<b>Mar</b>	6,034,611	1,205,713	1,516,912	1,352,708	2,983,858	2,111,590
<b>Apr</b>	1,068,795	1,122,055	2,188,234	1,604,005	2,300,198	1,699,505
<b>May</b>	2,395,662	1,306,574	640,762	1,681,418	2,280,120	1,727,310
<b>Jun</b>	1,539,306	1,120,504	3,655,052	1,996,693	2,692,186	2,109,913
<b>Jul</b>	1,782,222	1,447,650	3,102,872	1,948,596	3,285,539	1,952,417
<b>Aug</b>	6,441,660	1,682,651	2,070,073	1,999,320	1,939,055	2,250,041
<b>Sep</b>	8,285,000	1,217,717	5,094,020	2,123,730	5,160,836	2,527,486
<b>Oct</b>	1,915,635	1,963,401	2,640,526	2,555,596	1,826,562	2,439,310
<b>Nov</b>	2,459,400	1,628,240	2,015,443	2,184,822	4,440,262	2,677,541
<b>Dec</b>	2,335,240	1,901,947	2,246,506	1,748,297	1,878,502	1,622,373
<b>Average</b>	<b>3,105,953</b>	<b>1,440,782</b>	<b>2,633,436</b>	<b>1,854,018</b>	<b>2,698,188</b>	<b>2,072,344</b>

  

	<b>2016</b>		<b>2017</b>	
	<b>Union Bank</b>	<b>Mellon Bank</b>	<b>Union Bank</b>	<b>Mellon Bank</b>
<b>Jan</b>	2,690,228	1,704,944	1,736,799	1,749,542
<b>Feb</b>	2,288,545	1,736,136	1,453,838	1,932,325
<b>Mar</b>	4,708,585	1,931,830	1,506,449	1,464,358
<b>Apr</b>	1,331,970	1,468,157	1,008,449	2,046,260
<b>May</b>	2,402,318	1,515,737	996,664	1,933,207
<b>Jun</b>	4,139,617	1,771,032	2,207,886	1,683,185
<b>Jul</b>	4,948,880	1,442,270	1,106,290	2,258,691
<b>Aug</b>	1,725,218	2,061,822	1,625,529	2,482,761
<b>Sep</b>	4,251,348	2,258,017	1,046,384	2,050,461
<b>Oct</b>	1,453,724	2,254,404	1,161,651 <sup>1</sup>	2,266,171
<b>Nov</b>	2,190,175	2,478,905	1,855,601	2,438,488
<b>Dec</b>	2,784,439	1,887,776	1,199,435	2,007,202
<b>Average</b>	<b>2,909,587</b>	<b>1,875,919</b>	<b>1,408,748</b>	<b>2,026,054</b>

1) The October 2017 Union Bank balance has been adjusted by \$1,311,805 to offset a negative balance shown for the month. The bank processed an ACH batch one business day early, temporarily overdrawing the account. The original ACH date had been scheduled on a bank holiday. Without this adjustment, the October 2017 balance would be (\$150,154).

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FEA-01-30. Working Capital-Prepayments. Refer to Exhibit No. SDG&E-36-WP-R, Schedule P-3a. Provide an itemization of the subaccounts included in prepayments shown on this schedule.

**SDG&E Response 01-30:**

Please see excel spreadsheet tab “Sch.P Detail” in the Confidential attachment attached to the response and referenced in Question FEA-01-27 above.

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FEA-01-31. Working Capital-Deferred Debits. Refer to Exhibit No. SDG&E-36-WP-R, Schedule P-6. Provide an itemization of the subaccounts included in deferred debits shown on this schedule.

**SDG&E Response 01-31:**

Please see excel spreadsheet tab “Sch.P Detail” in the Confidential attachment attached to the response and referenced in Question FEA-01-27 above.

**FEA DATA REQUEST  
FEA-SDG&E-DR-01  
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FEA-01-32. Electric Plant in Service. Refer to Exhibit No.SDG &E-33 –WP, page 8. Provide the electric plant balances for each calendar year 2012, 2013, 2014, 2015, 2016, and 2017 for each of the categories shown (distribution, general, common, steam & other, and nuclear).

**SDG&E Response 01-32:**

Please refer to attachment: “FEA-DR-01 Q32.xlsx” for the requested data.

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FEA-01-33. Accumulated Depreciation. Refer to Exhibit No.SDG&E-33 –WP, page 510. Provide the accumulated depreciation balances for each calendar year 2012, 2013, 2014, 2015, 2016, and 2017 for each of the categories shown (distribution, general, common, steam & other, and nuclear).

**SDG&E Response 01-33:**

Please refer to attachment: “FEA-DR-01 Q33.xlsx” for the requested data.

**FEA DATA REQUEST**  
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FEA-01-34. Plant held for future use. Identify the amount of PHFFU included in the recorded year and the test year rate base, separately for electric and gas. For each item of PHFFU, please provide i) a description of each component of PHFFU, ii) the date when the property was acquired, iii) the purpose of acquiring the property and iv) the date when the property is expected to be used and useful.

**SDG&E Response 01-34:**

SDG&E included \$5,653,864 of Plant Held for Future Use (PHFU) in the recorded year 2016 and Test Year (TY) 2019 rate base for electric. There were no dollars of PHFU for gas recorded in rate base for either recorded year 2016 or TY 2019. Please see details below for each item included.

- Salt Creek Substation Land\*\*
  - i. Land held for use in new 69/12KV Substation - \$6,005,098
  - ii. Purchased in 2011
  - iii. Transmission/Distribution Substation
  - iv. Estimated in-service 12/2017-transferred to utility plant in January of 2017.
  
- Ocean Ranch Substation Land\*\*
  - i. Land held for use in new 69/12KV Substation - \$4,941,794
  - ii. Purchased in 2013
  - iii. Transmission/Distribution Substation
  - iv. Estimated in-service 05/2019.
  
- Oceanside Substation Land\*\*
  - i. Held for expansion to existing substation - \$360,835
  - ii. Purchased in 2012
  - iii. Transmission/Distribution Substation
  - iv. Estimated in-service 03/2019-transferred to utility plant in August of 2017.

\*\*For ratemaking: ½ of the cost allocated to electric transmission (FERC) and ½ of the cost allocated to electric distribution (CPUC).

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FEA-01-35. Abandoned plant. Has the Company included any abandoned plant in rate base? If so, identify the amount included in the recorded year and the test year. Also identify the date when the plant was abandoned as well as an explanation of why the abandoned plant has been included in rate base.

**SDG&E Response 01-35:**

SDG&E has not included abandoned plant in rate base in this TY 2019 General Rate Case (GRC).

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FEA-01-36. Non-utility plant. Has the Company included any non-utility plant in rate base? If so, identify the amount included in the recorded year and the test year. Provide an explanation of why the non-utility plant has been included in rate base.

**SDG&E Response 01-36:**

SDG&E has not included non-utility plant in rate base in this TY 2019 GRC.

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**LIABILITY INSURANCE**

FEA-01-37. General Excess. Refer to Exhibit No. SCG-29/SDG&E-27-WP/Witness K. Cayabyab. Please update Liability Insurance (B Schedules) to include 2017 actual expense for each of the following:

- a. General excess
- b. Liability Insurance Excess fire
- c. Wildfire damage reinsurance
- d. D&O
- e. Fiduciary
- f. Workers Comp
- g. Cyber security
- h. Liab Ins Auto
- i. Yuma 500 kv
- j. Broker fees
- k. P&I Charter
- l. Pollution
- m. Railroad Protective

**SDG&E Response 01-37:**

Please see FEA DR-1 Attachment FEA-01-37. Please note for j. Broker Fees the 2017 included the first quarter payment of 2018 of \$195,000.

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FEA-01-38. Premium Renewal. Refer to Appendix B of Exhibit SCG-29/SDG&E-27. Please provide the letter supplied to the Company by Marsh in the previous rate case.

**SDG&E Response 01-38:**

Marsh did not provide a letter in the previous rate case.

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**SDG&E RESPONSE**  
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FEA-01-39. Liability Insurance. Refer to Appendix B of Exhibit SCG-29/SDG&E-27. For all categories of insurance that the Company did not utilize the percentage increases in Appendix B to derive the test year level of expense, provide an explanation how the TY amount was derived.

**SDG&E Response 01-39:**

As outlined in my testimony, forecasting insurance premiums with reasonable certainty is difficult as there are several non-Sempra related factors that can influence premiums in any given year. Because of that, for our 2019 GRC we incorporated input from our insurance broker (Marsh) to provide insurance market forecasts based on their experience as the world largest insurance broker.<sup>1</sup> As outlined in the respective workpaper allocation reconciliation workpapers, various factors including but not limited to the Marsh forecast were used to generate escalation factors for the different lines of coverage.

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<sup>1</sup> See attached “Business Insurance July 2017 100 Largest Brokers of U.S. Business.pdf”

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FEA-01-40. Non-California Workers Comp. Refer to Table NKC-13 on page NKC-12 in Exhibit SCG-29/SDG&E-27. Please explain the increase to 10.5% in 2019 over the 4.9% in 2016. Provide supporting calculations and documentation.

a. Auto Liability. Refer to Table NKC-15 on page NKC-13 in Exhibit SCG-29/SDG&E-27. Please explain the increase to 9.3% in 2019 over the 5.2% in 2016. Provide supporting calculations and documentation.

b. Provide an explanation of the "Vehicle" blended method.

**SDG&E Response 01-40:**

- a. The increase in allocation rates for both SDG&E and SCG from 2016 to 2019 was due to the divestiture of a global retained business unit and reflects an increase in the number of participants at the corporate center.
- b. The increase in allocation rates for both SDG&E and SCG from 2016 to 2019 was due to the divestiture of a global retained business unit. This divestiture decreased the total number of vehicles from 233 to 75 vehicles covered in this program. This resulted in increased allocation percentages to the utilities as the number of corporate center vehicles remained constant over that period. Corporate center vehicles are allocated to SDG&E and SCG by the Multi- Factor Basic Allocation rate
- c. The “Vehicle” blended method is the allocation of corporate center vehicle costs among different business units utilizing the Multi-Factor Basic Allocation rate.

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FEA-01-41. Workers Comp. Refer to page 51 of Exhibit No. SCG-29/SDG&E-27-WP/Witness K. Cayabyab. Explain basis for the increase to this expense in the 2019 test year as the amounts for the years 2012-2016 have remained fairly constant.

**SDG&E Response 01-41:**

The current Workers Compensation (WC) policies were renewed on June 26, 2017. The actual renewal premiums for both the Non-California WC and the Excess WC policy were used for the 2017 GRC forecast because we had those amounts in advance of our October 6<sup>th</sup> GRC filing date. The 2018 and 2019 forecasts use as their starting points the 2017 actual renewal premiums escalated by the broker recommendations set forth in Appendix B of the testimony,

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FEA-01-42. D&O. Did the Company remove any portion of D&O insurance expense from the 2019 test year or is the Company requesting full recovery of this expense from ratepayers? If any amounts were removed, identify the amount removed and the corresponding workpaper/schedule from which the amount was removed. If no amounts were removed, explain why shareholders should not share this cost.

**SDG&E Response 01-42:**

As shown in Table NKC-10 on page NKC-10 of the testimony, the allocation for the D&O insurance is based on a Multi-Factor Split; of that amount, 50% of the premium was retained by the Corporate Center/Global. The dollar allocation amounts are also shown on Workpaper B-3 page 43 of 84.

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ELECTRIC O&M

FEA-01-43. Risk mitigation. Refer to Exhibit SDG&E-15-R, page WHS-3, lines 4-6. Provide a brief explanation of how the risk mitigation efforts in the current case are different than the prior GRC.

**SDG&E Response 01- 43:**

Please see Exhibit SDG&E-02-R, Chapters 1 and 3, for a discussion of RAMP risk mitigation efforts in the current GRC, and Section II of Exhibit SDG&E-15-R for a discussion of RAMP-related GRC costs specific to that chapter. The proposed risk mitigation efforts in the current case that are new or expanded upon from the prior GRC include the following items:

<b>Program</b>	<b>Workpaper</b>	<b>Workpaper Reference</b>
Distribution Planning Process	1ED001 - Reliability & Capacity	SDGE-15-WP p.11
Overhead small wire and connector replacement	1ED002 - Construction Services	SDGE-15-WP p.24
PRiME	1ED002 - Construction Services	SDGE-15-WP p.26
Overhead Switch Inspection and High-Risk Replacement	1ED002 - Construction Services	SDGE-15-WP p.27
Underground Switch Inspection and High-Risk Replacement	1ED002 - Construction Services	SDGE-15-WP p.28
Replace bridged cutout switches	1ED002 - Construction Services	SDGE-15-WP p.29
4kV Modernization - Distribution	1ED002 - Construction Services	SDGE-15-WP p.30
Overhead Switch Inspection and High-Risk Replacement	1ED011 - Electric Regional Operations	SDGE-15-WP p.113
Long Span Inspection and Repair	1ED011 - Electric Regional Operations	SDGE-15-WP p.114
Develop governing documents for aviation operations	1ED011 - Electric Regional Operations	SDGE-15-WP p.116
Aviation Services Department annual audit	1ED011 - Electric Regional Operations	SDGE-15-WP p.119
Twin-engine helicoper	1ED011 - Electric Regional Operations	SDGE-15-WP p.121
Helicopter proficiency training	1ED011 - Electric Regional Operations	SDGE-15-WP p.122

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**SDG&E Response 01- 43:-Continued**

Develop Unmanned Aerial Systems (UAS) operating procedures	1ED011 - Electric Regional Operations	SDGE-15-WP p.128
Develop UAS privacy policy	1ED011 - Electric Regional Operations	SDGE-15-WP p.129
Develop UAS training program	1ED011 - Electric Regional Operations	SDGE-15-WP p.130
Develop contractor qualification, oversight, and audit program	1ED011 - Electric Regional Operations	SDGE-15-WP p.131
Develop flight management controls	1ED011 - Electric Regional Operations	SDGE-15-WP p.132
UAS evaluation and implementation of technology advances	1ED011 - Electric Regional Operations	SDGE-15-WP p.133
Underground Switch Inspection and High-Risk Replacement	1ED011 - Electric Regional Operations	SDGE-15-WP p.140
Customer Communications Safety	1ED011 - Electric Regional Operations	SDGE-15-WP p.111
4kV Modernization - Substation	1ED015 - Substation C&O	SDGE-15-WP p.174
CBM - Distribution	1ED015 - Substation C&O	SDGE-15-WP p.173
PRiME	1ED018 - Distribution and Engineering	SDGE-15-WP p.193
Increased Outreach Program	1ED018 - Distribution and Engineering	SDGE-15-WP p.196
Create formal training programs in distribution standards and substation engineering	1ED018 - Distribution and Engineering	SDGE-15-WP p.198
Joint power line inspections with CalFire	1ED021 - Vegetation Management	SDGE-15-WP p.218
Santa Ana Wildfire Threat Index (SAWTI)	1ED027 - Emergency Management	SDGE-15-WP p.285
Web based situational tool for coordination with agencies	1ED027 - Emergency Management	SDGE-15-WP p.286
Weather Stations	1ED027 - Emergency Management	SDGE-15-WP p.291
University Team	1ED027 - Emergency Management	SDGE-15-WP p.279
Consultant Support - climate change training	1ED027 - Emergency Management	SDGE-15-WP p.280

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ISO 55000 Certification	1ED019 - Asset Management	SDGE-15-WP p.322
Performance of the annual self-assessment for compliance with records management policies and procedures	1ED019 - Asset Management	SDGE-15-WP p.323

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FEA-01-44. Customer communication safety program. Refer to Exhibit SDG&E-15-R, page WHS-4, lines 22-24. Please explain how the Customer Communication safety program efforts are different in the current case than the prior GRC.

**SDG&E Response 01-44:**

SDG&E-15-R discusses the risk mitigation activities and costs included in its Customer Communications Safety Program throughout (*see, e.g.*, WHS-4-5), including ERO testimony beginning at WHS-38 (*see, e.g.*, WHS-42-43), in the section of testimony discussing RAMP costs (Section II), and in the workpapers. SDG&E also included detailed Supplemental Workpapers for Electric Regional Operations that includes this information, please see SDG&E-15-WP page 146, which details the breakdown for each item of the Public Safety Campaign. In addition, we have attached “ORA-SDGE-075-Q1 Public Safety Campaign.xlsx” for your reference. Finally, as discussed in Section II of testimony, the Customer Communications Safety Program risk mitigation activities and the risks they mitigate are discussed in SDG&E’s RAMP Report (available at <https://www.sdge.com/regulatory-filing/20016/risk-assessment-and-mitigation-phase-report-sdge-socalgas>, *see, e.g.*, RAMP Chapters 3 and 15).

In prior years, SDG&E has made requests for programs that have undertaken activities related to public safety, such as our fire risk mitigation programs, our inspection and maintenance programs, advances in system protection, and our design and engineering standards and work methods that are in place to reduce the risks associated with the electric system. However, in evaluating risks to the public, SDG&E sees an opportunity to further improve public safety by directly reaching out and educating the public through a media outreach program. The Customer Communication safety program is specifically designed to provide customers with the education and tools to respond to electric emergencies and will also provide information on how to proactively avoid dangerous situations.

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FEA-01-45. Public safety incidents. Refer to Exhibit SDG&E-15-R, page WHS-5, lines 6-8. Please identify the number of public safety incidents for each of the following calendar years: 2012, 2013, 2014, 2015, 2016 and 2017.

**SDG&E Response 01-45:**

SDG&E objects to this request to the extent that it is vague and ambiguous with respect to the meaning of “public safety incidents.” Subject to and without waiving this objection, please see the attached “FEA-SDGE-01-Q45 Public Safety Incidents.xlsx,” which provides a list of tracked public contact with SDG&E equipment from 2016 to 2017.

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FEA-01-46. Electric Distribution O&M. Refer to Exhibit SDG&E-15-WP. Provide the actual expenses for each of the following categories for 2017 and please break out the expenses by labor, non-labor and NSE:

- a. ERO
- b. EDO
- c. Vegetation Management
- d. Construction Services

**SDG&E Response 01-46:**

2017 expenses are not yet available.

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FEA-01-47. Electric Distribution O&M. Provide the authorized expenses for each of the following categories for each of the following calendar years 2012, 2013, 2014, 2015, 2016, and 2017:

- a. ERO
- b. EDO
- c. Vegetation Management
- d. Construction Services

**SDG&E Response 01-47:**

Please see attached worksheet 'FEA-SDGE DR-01 Q47.xlsx'

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ELECTRIC CAPITAL

FEA-01-48. Budget variance reports. Provide copies of budget variance reports for electric distribution capital expenditures for each of the calendar years 2012, 2013, 2014, 2015, 2016 and 2017.

**SDG&E Response 01- 48:**

See the table below for the variance of distribution capital expenditures. Please note that SDG&E tracks capital at the functional committee level which includes fully loaded overheads and excludes AFUDC.

Year	Planned (\$1,000)	Actual (\$1,000)
2012	\$281,095	\$290,921
2013	\$255,137	\$253,422
2014	\$278,285	\$263,430
2015	\$309,334	\$285,294
2016	\$428,006	\$465,570
2017	\$544,216	\$558,769

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FEA-01-49. Delayed Projects. Identify all projects that were included in the 2015, 2016, 2017, 2018 and 2019 budgets that were postponed or have been delayed and include the reason for the delay.

**SDG&E Response 01-49:**

Other than the projects below, no other projects have been postponed from 2015-2019. From the TY2016 GRC, the following projects were delayed and carried over into TY2019 GRC.

Budget	Budget Name	Justification
2258	Salt Creek Substation & New Circuits	Project was originally planned to be completed in the TY2016 GRC cycle; however, it was delayed as a result of not receiving the required permitting to begin construction as originally estimated. The project was completed in 2017.
11256	C1023, LI: NEW 12KV CIR & RECOND C354	Project delayed because a customer halted expansion plans for existing facilities for economic reasons. The customer has informed SDG&E of its previous plans to expand and is proceeding with the project.
7245	Telegraph Canyon- 138/12kV Bank & C1226	Project was originally planned to be completed in the TY2016 GRC cycle; however, it was delayed due to construction delays in the original construction schedule.

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9271	C1259, MAR: New 12kV Circuit	Project was originally planned to be completed in the TY2016 GRC cycle; however, it was delayed due to a redefined scope, which changed the construction schedule.
13242	Rebuild Kearny 69/12KV Substation	Project was originally planned to be completed in the TY2016 GRC cycle; however, it was delayed as a result of not receiving the required permitting to begin construction as originally estimated.
9153	TL676 Mission to Mesa Heights Reconductor	Project was originally planned to be completed in the TY2016 GRC cycle; however, the project was delayed due to permitting delays, as well as a redefined scope, which changed the construction schedule.
11126	TL663 Mission to Kearny Reconductor	Project was originally planned to be completed in the TY2016 GRC cycle; however, the project was delayed due to permitting delays, as well as a redefined scope, which changed the construction schedule.
13130	Loop TL674A into Del Mar and RFS TL666D	Project was originally planned to be completed in the TY2016 GRC cycle; however, it was delayed due to permitting delays.

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FEA-01-50. Capital requirements. Refer to Exhibit SDG&E-33-R, page RCG-3, lines 27-29. Provide the capital requirements submitted to the CPC for each of the following Electric Distribution Capital Categories:

- a. Overhead pools
- b. Reliability/Improvements and
- c. Safety & Risk Management

**SDG&E Response 01-50:**

SDG&E submits a forecast of the capital requirements that were submitted to the Capital Planning Committee (CPC). Note that SDG&E does not forecast the overhead pools as part of the annual capital budgeting process. Please see the accompanying document, “2017 CPUC Forecast Allocations Submitted to CPC.xlsx,” showing the 2017 forecast of capital expenditures that were submitted to the CPC.

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FEA-01-51. Zero based forecast. Refer to SDG&E Exhibit-14-R, page AFC-xx (summary following the table of contents):

- a. What percent of the electric distribution capital projects in the last GRC were based on zero based forecasts?
- b. Explain why the majority of the electric distribution capital projects are non-recurring.

**SDG&E Response 01-51:**

- a. Approximately 75% of the forecast in the TY2016 Electric Distribution Capital GRC were zero based forecasts.
- b. The majority of the electric distribution capital projects are non-recurring due to the fact that the projects are either placed in service by the test year, have a given in service date beyond the test year or have no historical costs. Recurring capital projects are often described as ‘blanket’ or ‘routine’ budgets, which are a collection of many like-kind items that are constructed every year, year-after-year. Pole replacements are an example of such a blanket budget (BC87232). Because of the recurring nature of the work and the retention of the same budget number it is a straightforward matter to see historical expenditures in blanket budgets. Non-recurring projects are normally individually-identifiable projects of a larger magnitude that have distinct in-service dates and unique budget numbers. An example of a non-recurring project is the construction of a new substation. While there are multiple substations constructed, each is considered sufficiently unique to warrant its own budget code. Because of the unique and nonrecurring nature of these ‘specific’ budgets, there is no cost history associated with them from other projects.

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FEA-01-52. Capital expenditures. Refer to SDG&E Exhibit-14-R, page AFC-3, lines 8-9. Provide actual amounts for each of the calendar years 2011, 2012, 2013, 2014, 2015, 2016 and 2017 for each of the ten categories shown.

**SDG&E Response 01-52:**

Please refer to the capital work papers for actual amounts for the budgets included in SDG&E-14-R. A summary of the forecast amounts for those categories is found on page 1, and the 2012-2016 cost histories for each of the budgets within those categories follow in category groups within that workpaper volume.

With respect to costs for 2011, SDG&E objects to this request under Rule 10.1 on the grounds that it seeks information that is outside the scope of the TY 2019 GRC proceeding, is burdensome to produce and is unlikely to lead to the discovery of admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows: The requested information is outside the scope of the standard requirements described in the Rate Case Plan and is not available in an adjusted format that would allow for a like-kind comparison in this proceeding. SDG&E's testimony and workpapers contain five years of historical data, 2012 through and including 2016, that has been reviewed and adjusted according to Rate Case Plan requirements. Additional years prior to 2012 have not undergone similar review and adjustment and would be burdensome to create.

Please see the accompanying file "2017 Recorded Capital Expenditures - SDG&E-14 Colton.xlsx"

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FEA-01-53. Capital expenditures. Refer to SDG&E Exhibit-14-R, page AFC-3, lines 8-9. Provide budgeted amounts for each of the calendar years 2011, 2012, 2013, 2014, 2015, 2016 and 2017 for each of the ten categories shown.

**SDG&E Response 01-53:**

With respect to values for 2011, SDG&E objects to this request under Rule 10.1 on the grounds that it seeks information that is outside the scope of the TY 2019 GRC proceeding, is burdensome to produce and is unlikely to lead to the discovery of admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows: The requested information is outside the scope of the standard requirements described in the Rate Case Plan and is not available in an adjusted format that would allow for a like-kind comparison in this proceeding. SDG&E's testimony and workpapers contain five years of historical data, 2012 through and including 2016, that has been reviewed and adjusted according to Rate Case Plan requirements. Additional years prior to 2012 have not undergone similar review and adjustment and would be burdensome to create.

Authorized amounts in the prior two GRCs by year for each of the categories listed is provided in the accompanying file "FEA-DR-01-53.xlsx."

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FEA-01-54. Capital Expenditures. Refer to SDG&E Exhibit-14-R. Provide the 2017 actual costs for the following categories and break out between labor, non-labor and NSE:

- a. Overhead pools
- b. Reliability/Improvements and
- c. Safety & Risk Management

**SDG&E Response 01-54:**

Please see the accompanying file “2017 Recorded Capital Expenditures - SDG&E-14 Colton.xlsx”