

**FEA DATA REQUEST
FEA-SDG&E-DR-02
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: MARCH 28, 2018
DATE RESPONDED: APRIL 11, 2018**

RATE BASE

FEA-02-1. Prepayments. Refer to the Confidential Attachment provided in response to FEA-01-30. Provide a detailed explanation what each of the following prepayments pertain to and the Company's justification for including these items as prepayments in working capital in the current case.

BEGIN CONFIDENTIAL

- a. GHG Allowance Moreno
- b. GHG Allowances Natural Gas Supplier

END CONFIDENTIAL

SDG&E Response 02-1:

a & b. Each of these accounts include the portion of gas emission credits purchased by SDG&E that have not yet been amortized into the GRG balancing accounts. These amounts are included in SDG&E's working cash request as they represent a usage of cash with no other provision for return, as defined in Standard Practice U-16-W.

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- FEA-02-2. Customer deposits. Refer to CPUC Sheet 25229-E Rule 7.
(http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-RULES_ERULE7.pdf)
- a. Identify whether these customer deposits are included as part of customer advances for construction which are reflected as a reduction to rate base. If not, please explain whether these customer deposits are reflected as a reduction from rate base. If not reflected as a reduction, explain why not.
 - b. Provide the 13-month average balance for the 2016 recorded year and the 13-month average balance 2019 Test Year.

SDG&E Response 02-2:

- a. The Customer Deposits referenced in CPUC Sheet 25229-E Rule 7 relate to the establishment of credit for new residential or Small Business Customers. These deposits are unrelated to Customer Advances for Construction, which relate to advances for customer-specific construction activities.

These Customer Deposits are not included as a reduction to rate base. This treatment is specifically prescribed in Standard Practice U-16-W p.I-8, which states the following regarding the inclusion of Customer Deposits in working cash calculations: “[Customer Deposits] (represent) monies advanced by the customer as security for the payment of utility bills. Only noninterest-bearing customer deposits are to be considered.”

CPUC Sheet 25229-E Rule 7 section C.1 states that “the Utility will pay interest, compounded monthly, at a rate of 1/12 of the interest rate on Commercial Paper (prime, 3 months), published the prior months in the Federal Reserve Statistical Release, H.15.”

Thus, excluding Customer Deposits from SDG&E’s working cash calculation is consistent with Standard Practice U-16-W.

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SDG&E Response 02-2 Continued:

b. Customer Deposits:

	<u>2016</u>	<u>2019</u>
13-Mo Average Balance ¹	72,576,820	77,700,743

1) Escalation factor of 1.0706 used to convert 2016 dollars to 2019 dollars, consistent with SDG&E's 2016 working cash study.

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FEA-02-3. Working cash. State whether the cash balances shown on Schedule P-1 of Exhibit SDG&E Working Cash/Exh No: SDG&E-36-WP (page 46 of 55) represent required minimum bank deposits.

SDG&E Response 02-3:

SDG&E's banking institutions do not have minimum cash balance requirements. Per the CPUC's Standard Practice U-16-W (Chapter 3 B 11), "In determining the cash requirement, the only amounts which should be considered are the required minimum bank deposits that must be maintained and **reasonable amounts of working funds**" (emphasis added). SDG&E strives to maintain the lowest positive collected cash balance practical, while providing a reasonable amount of working funds.

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FEA-02-4. Plant Held for Future Use. Refer to the response to FEA-01-34. For each of the items listed, provide:

- a. A description of the project
- b. The percent the project is complete.
- c. State whether the item is currently in service.
- d. If not in service, state the current estimate when it is expected to be in service.
- e. When the project was originally recorded in Account 105.

SDG&E Response 02-4:

- Salt Creek Substation Land
 - a. Salt Creek Substation is a 69/12kV substation that provides future required capacity to the rapidly developing area. The new Salt Creek Substation is required to serve the ultimate load for the area of 286MW. The project also includes installing a new five-mile long 69kV tie line (TL6965) in the existing transmission corridor from the Salt Creek Substation to Miguel Substation and looping in an existing 69kV tie line (TL6910) to the Salt Creek substation.
 - b. This project was completed and placed into rate base in December of 2017.
 - c. As of the date of this response, this project is currently in service.
 - d. N/A
 - e. The purchase of the land supporting this project was originally recorded in Account 105 in July of 2011.

- Ocean Ranch Substation Land
 - a. Ocean Ranch Substation is a 69/12kV low profile substation with an initial capacity of 60 MVA rating and an ultimate capacity of 120 MVA. The substation will include a 69kV power line underground loop-in, four 12kV distribution underground lines and a monopole with microwave antenna and associated telecommunications equipment.
 - b. As of the date of this response, this project is approximately 18% complete.
 - c. As of the date of this response, this project is not currently in service.
 - d. As of the date of this response, the current estimated completion date for the entire substation is September 30, 2019.
 - e. The purchase of the land supporting this project was originally recorded in Account 105 in March of 2013.

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SDG&E Response 02-4 Continued:

- Oceanside Substation Land
 - a. The purchase of this land is to support future expansion of the 69/12kV existing Oceanside Substation. The property a lot adjacent to Oceanside Substation. This property is needed to allow future expansion of the substation or the replacement of the obsolete equipment. In addition is will allow for increased working clearances to enhance safety within the substation.
 - b. As of the date of this response, this project is currently in the preliminary engineering stage required to expand Oceanside Substation and replace the existing obsolete equipment. The preliminary work for this stage is approximately 20% complete.
 - c. The land purchased for the expansion is currently in service, but no other costs associated with this project are currently in service.
 - d. As of the date of this response, the current estimated completion date of this project is March of 2019.
 - e. The purchase of the land supporting this project was originally recorded in Account 105 in May of 2012.

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POST TEST YEAR RATEMAKING MECHANISM

FEA-02-5. Refer to the response to FEA-01-04, provide actual capital additions separately for each year 2011 and 2012.

SDG&E Response 02-5:

Please see table below for actual capital additions for 2011 and 2012. As stated in the testimony of Ken Deremer, “capital additions by major plant category for each year are escalated to PTY dollars based on Global Insight indices, as described in the testimony of Mr. Wilder” (SDG&E-43-R, page KJD-7, lines 12-13). The figures below are in 2019\$.

	2011	2012
Capital Additions	\$ 904,172	\$ 637,051

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REGULATORY ACCOUNTS

FEA-02-6. TTBA. Provide the balances in the TTBA for each of the years ended December 31, 2012, 2013, 2014, 2015, 2016, 2017 and year to date 2018.

SDG&E Response 02-6:

Below are the balances as of December 31 for years 2012 through 2017, and the account balances as of February 28, 2018 which is the most current recorded balance at the time of this response. Numbers in parenthesis represent overcollections.

2012	\$6,062,280
2013	(6,843,273)
2014	(13,063,490)
2015	(9,247,039)
2016	(5,516,418)
2017	(5,337,821)
2018	(7,000,893)

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FEA-02-7. OMABA. Provide the proposed preliminary statement for the OMABA.

SDG&E Response 02-7:

No preliminary statement has been developed for the OMABA. One will be developed when the account is approved by the Commission through the advice letter to establish the account. For details on the OMABA, please see the Direct Testimony of Norma G. Jasso (Exhibit SDG&E-41).

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FEA-02-8. LIPBA. Provide the proposed preliminary statement for the LIPBA.

SDG&E Response 02-8:

No preliminary statement has been developed for the LIPBA. One will be developed when the account is approved by the Commission through the advice letter to establish the account. For details on the LIPBA, please see the Direct Testimony of Norma G. Jasso (Exhibit SDG&E-41).

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FEA-02-9. TPCBA. Provide the proposed preliminary statement for the TPCBA.

SDG&E Response 02-9:

No preliminary statement has been developed for the TPCBA. One will be developed when the account is approved by the Commission through the advice letter to establish the account. For details on the TPCBA, please see the Direct Testimony of Norma G. Jasso (Exhibit SDG&E-41).

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FEA-02-010 LIPBA. a) Please identify all costs, by amount and account, recorded in each of the years, 2012 through 2017 and 2018 year to date for costs of the same type that SDG&E proposes to include in the LIPBA. b) Please identify all budgeted costs, for each year, 2019 through 2021, for costs of the same type that SDG&E proposes to include in the LIPBA. Please provide such information by FERC account.

SDG&E Response 02-10:

a. This information was previously provided. Please refer to FEA DR-001 Question 37 attachment 1 which details the liability accounts that will be a part of the LIPBA account. That response also provided FEA with 2012-2017 actuals. These costs represent the allocated amounts to the utilities. 2018 financial information is not available.

b. The 2019 forecast for these accounts are also provided in the attachment to FEA DR-001 Question 37 attachment 1 and can be found in the workpapers of Neil Cayabyab. Please see Workpaper B Liability for the insurance costs associated with the LIPBA Account. These costs are detailed in Workpapers B1-B6 and represent the allocated amounts to the utilities.

No forecast for 2020-2021 is available as the General Case, as presented in A.17-10-007, proposes a Revenue Requirement for 2019, the Test Year. Attrition year mechanisms escalate the Test Year 2019 Revenue Requirement forward into 2020 and 2021. See the Direct Testimony of Kenneth J. Deremer (SDG&E-43) for details on the Post-Test Year mechanism.

Information in the SoCalGas/SDG&E General Rate Case is not presented by FERC account.

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FEA-02-011 TPCBA. a) Please identify all costs, by amount and account, recorded in each of the years, 2012 through 2017 and 2018 year to date for costs of the same type that SDG&E proposes to include in the TPCBA. b) Please identify all budgeted costs, for each year, 2019 through 2021, for costs of the same type that SDG&E proposes to include in the TPCBA. Please provide such information by FERC account.

SDG&E Response 02-11:

a.-b. Please refer to the workpapers that accompany the direct testimony of Sandra K. Hrna (Exhibit SDG&E-31-WP) beginning on page 51 of 240 for information on Claims Payments and Recovery costs for 2012-2016 and the forecast for 2017-2019. Actual 2017 data for Claims Payments and Recoveries is \$9,122,963. Financial data for 2018 is not available.

No forecast for 2020-2021 is available as the General Case, as presented in A.17-10-007, proposes a Revenue Requirement for 2019, the Test Year. Attrition year mechanisms escalate the Test Year 2019 Revenue Requirement forward into 2020 and 2021. See the Direct Testimony of Kenneth J. Deremer (SDG&E-43) for details on the Post-Test Year mechanism.

Information in the SoCalGas/SDG&E General Rate Case is not presented by FERC account.

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FEA-02-12 OMABA. a) Please identify all budgeted costs, for each year, 2019 through 2021, for costs of the same type that SDG&E proposes to include in the OMABA. Please provide such information by FERC account.

SDG&E Response 02-12:

a. SDG&E objects to this question on the grounds that the question assumes facts not in evidence. The question misstates the testimony of Norma G. Jasso (Exhibit SDG&E-41) on the OMABA as budgeted costs are not proposed to be included in the OMABA. Subject to and without waiving the foregoing objection, SDG&E responds as follows: The OMABA, as stated in the Direct Testimony of Norma G. Jasso (SDG&E-41), is to record the revenues collected from customers through January 1, 2019 until SDG&E takes ownership of the Otay Mesa Energy Center and it becomes a used and useful asset. Therefore, there are no budgeted costs to be recorded in the OMABA.

Information in the SoCalGas/SDG&E's General Rate Case is not presented by FERC account.

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FEA-02-13 OMABA. Refer to page DSB-5 of Exhibit SDG&E-16 lines 11-13. Provide the purchased power costs under the PPA for each year 2012, 2013, 2014, 2015, 2016 and 2017.

SDG&E Response 02-13:

SDG&E objects to this question on the grounds that is it seeking information beyond the scope of and not relevant to this GRC proceeding. SDG&E is not seeking recovery of purchased power costs in this Test Year 2019 GRC proceeding.

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FEA-02-14 TPCBA. Please identify, explain fully and provide a complete copy of all evidence that SDG&E has relied upon showing that the occurrence of costs that SDG&E proposes to include in the TPCBA are unexpected, volatile and fluctuating.

SDG&E Response 02-14:

SDG&E objects to this question on the grounds that it is overbroad and it would be unduly burdensome to produce all potential evidence in support of its proposal. Subject to and without waiving this objection, SDG&E responds as follows. Please see the direct testimony of Sandra K. Hrna (Exhibit SDG&E-31, e.g., at pp. SKH-25 – SKH-27) for a description and justification of the TPCBA proposal. Please also see the workpapers that accompany the direct testimony of Sandra K. Hrna (Exhibit SDG&E-31-WP) beginning on page 51 of 240 for information relating the annual fluctuations in the Claims expenses.

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FEA-02-15 OMABA. Please identify, explain fully and provide a complete copy of all evidence that SDG&E has relied upon showing that the occurrence of costs that SDG&E proposes to include in the OMABA are unexpected, volatile and fluctuating.

SDG&E Response 02-15:

SDG&E objects to this question on the grounds that the question assumes facts not in evidence. The question misstates the testimony of Norma G. Jasso (Exhibit SDG&E-41). SDG&E has not relied upon the occurrence of costs that are proposed to be included in the OMABA, nor does SDG&E indicate that costs would be unexpected, volatile and fluctuating. Subject to and without waiving the foregoing objection, SDG&E responds as follows: The OMABA, as stated in the Direct Testimony of Norma G. Jasso (SDG&E-41), is to record the revenues collected from customers through January 1, 2019 until SDG&E takes ownership of the Otay Mesa Energy Center and it becomes a used and useful asset. The term “costs” are not included in Exhibit SDG&E-41 with regard to the OMABA.

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FEA-02-16 LIPBA. Please identify, explain fully and provide a complete copy of all evidence that SDG&E has relied upon showing that the occurrence of costs that SDG&E proposes to include in the LIPBA are unexpected, volatile and fluctuating.

SDG&E Response 02-16:

SDG&E objects to this question on the grounds that it is overbroad and it would be unduly burdensome to produce all potential evidence in support of its proposal. Subject to and without waiving this objection, SDG&E responds as follows. Please see the Direct Testimony of Neil Cayabyab (Exhibit SCG-29/SDG&E-27, e.g., at pp. NKC-14-15 and NKC 16-17) for a description and justification of the LIPBA proposal.

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FEA-02-17 NEMAMA. Identify the effective date Advice Letter 2529-E-A.

SDG&E Response 02-17:

The effective date is July 21, 2014.

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FEA-02-18 NEMAMA. Provide the proposed revised preliminary statement for the NEMAMA.

SDG&E Response 02-18:

The existing preliminary statement can be found at:

http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-PRELIM_NEMAMA.pdf

A proposed revised preliminary statement has not been developed or submitted for the NEMAMA at this time. However, the change requested in the Direct Testimony of Norma G. Jasso (Exhibit SDG&E-41), is to clarify the disposition section of the preliminary statement: “SDG&E proposes to modify the memorandum account disposition of the NEMAMA balance will now be addressed in SDG&E’s GRC proceeding or in another proceeding deemed appropriate by the Commission. SDG&E may seek, via advice letter filing, to propose a final billing service fee structure at a time wherein SDG&E has sufficient relevant details as to the appropriate amount of the fee structure pursuant to Special Condition 8 of SDG&E’s tariff Schedule NEM” (*see* Exhibit SDG&E-41 at p. NGJ-8 lines 4-9).

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- FEA-02-19 NEMAMA. Refer to page 6 of Advice Letter 2529-E-A submitted on January 15, 2014.
- a. When will the billing service fees in line with actual program costs be set?
 - b. What is the actual set up fee?

SDG&E Response 02-19:

- a. SDG&E does not know the actual program costs at this time. Initial billing service fees for the NEM Aggregation program were established in Advice Letter 2529-E-A. SDG&E expects to have a better understanding of the NEM Aggregation costs towards the end of 2018. Please note that the NEM Aggregation program was established through a separate regulatory mechanism (i.e., not a prior GRC).
- b. SDG&E's current set-up fees can be found in the following tariff schedules:

Schedule NEM: http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_NEM.pdf

Sheet 21: Special Condition 8 (d)(1): "A one-time service establishment fee of \$25 per Aggregated Account (capped at \$500 per Aggregated Arrangement) and a monthly billing fee of \$5 per Aggregated Account will be assessed to NEM Aggregation Customers receiving service under this Special Condition. These interim billing service charges may be subject to change upon approval by the Commission on a going-forward basis."

Schedule NEM-ST: http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_NEM-ST.pdf

Sheet 22: Special Condition 7 (d)(1): "A one-time service establishment fee of \$25 per Aggregated Account (capped at \$500 per Aggregated Arrangement) and a monthly billing fee of \$5 per Aggregated Account will be assessed to NEM-ST Aggregation Customers receiving service under this SC. These interim billing service charges may be subject to change upon approval by the Commission on a going forward basis."

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FEA-02-20 NEMAMA. Refer to the response to FEA-01-11. Provide the account transaction detail for the NEMAMA for the year ended December 31, 2014 and year to date 2018.

SDG&E Response 02-20:

SDG&E presents the 2018 NEMAMA detail through the most current month recorded to date. No activity was recorded in 2014. Please note that the 2015 detail provided in response to FEA-01-11, does not have a balance forward from 2014.

	Jan-18	Feb-18
Beginning Balance	\$372,265	\$391,165
Revenue		
Billed Revenue	(24,930)	(34,065)
Total Revenues	(24,930)	(34,065)
O&M	43,375	27,915
Total Costs	43,375	27,915
Current Month Activity	18,445	(6,150)
Interest Rate:	1.43%	1.59%
Current Month Interest	455	514
Current Activity and Interest	18,900	(5,636)
Ending Balance	391,165	385,529

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- FEA-02-21 NEMAMA. Refer to the NEMAMA account detail provided in the attachment to the response to FEA-01-11.
- a. Explain the increase in total O&M costs in 2017 over 2016 as the revenues have not increased proportionately.
 - b. Explain the significant increase in the December 2017 O&M expense over the other months in 2017.

SDG&E Response 02-21:

- a. Higher costs are attributable to increased resources focused on processing the backlog of customer applications.
- b. Timing difference related to temporary agency invoicing and year-end accruals.

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ELECTRIC O&M EXPENSES

FEA-02-22. Electric Regional Operations Expense. Refer to Exhibit SDG&E-15-WP, pages 96-104. Provide documentation supporting the incremental increases shown for the 2017, 2018 and 2019 forecasted years.

SDG&E Response 02-22:

SDG&E has chosen a Base Year plus incremental forecast methodology for the Electric Regional Operations workgroup. SDG&E expects the 2016 Base Year costs to continue, and incremental costs associated with new projects and programs to be added. SDG&E has prepared Supplemental Workpapers for Electric Regional Operations. SDG&E-15-WP pages 144-145 detail the additional projects and programs that SDG&E has proposed for TY 2019 that are in addition to the Base Year 2016 activities. The Supplemental Workpapers also include detailed estimates for the Public Safety Campaign (SDG&E-15-WP p. 146), and a summary of all requests related to Aviation Services and Unmanned Aerial Systems (UAS) (SDG&E-15-WP p. 147).

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FEA-02-23. Electric Distribution Operations Expense. Refer to Exhibit SDG&E-15-WP, pages 52-53. Provide documentation supporting increases shown for the 2017, 2018 and 2019 forecasted years.

SDG&E Response 02-23:

The increases are primarily due to the chosen forecast methodology of a 3-year linear trend. The documentation of the reasoning behind that baseline forecast can be found in the “Forecast Method” section of SDG&E 15-Speer WHS30-WHS31.

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FEA-02-24. Construction Services Expense. Refer to Exhibit SDG&E-15-WP, pages 15-20. Provide documentation supporting increases shown for the 2017, 2018 and 2019 forecasted years.

SDG&E Response 02-24:

SDG&E has chosen a Base Year plus incremental forecast methodology for the Construction Services workgroup. SDG&E expects the 2016 Base Year costs to continue, and incremental costs associated with new projects and programs to be added. SDG&E has prepared Supplemental Workpapers for Construction Services. SDG&E-15-WP pages 33-34 detail the additional projects and programs that SDG&E has proposed for TY 2019 that are in addition to the Base Year 2016 activities. The Supplemental Workpapers also include detailed estimates for the following projects: 1) Bridged Cutout Switch Replacement (SDG&E-15-WP p. 35), 2) OH Switch Replacement (SDG&E-15-WP p. 35), 3) UG Switch Replacement (SDG&E-15-WP p. 35), and 4) PRiME (SDG&E-15-WP p. 36). These four projects account for \$12.312 million (89%) of the \$13.803 million incremental request in TY 2019.

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FEA-02-25. Vegetation Management - Pole Brushing Expense. Refer to Exhibit SDG&E-15-WP, pages 212-213. Provide documentation supporting incremental increases shown for the 2017, 2018 and 2019 forecasted years.

SDG&E Response 02-25:

SDG&E has chosen a 5-year average forecast methodology for both labor and non-labor. This average best represents forecasted expenses related to pole brush activities while taking into consideration annual fluctuations. Additional forecast adjustments include a transfer of \$56k out of the Pole Brushing Workpaper to the Construction Services for the transfer of four employees. This is a net zero impact to the overall request as dollars removed from this workpaper are added to the Construction Services workpaper. Finally, there is a forecasted request of \$29k in labor to account for training and joint inspections. This annual cost represents 1/3 of an employee's time at \$85k per year.

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FEA-02-26. Vegetation Management - Tree Trimming Expense. Refer to Exhibit SDG&E-15-WP, page 221. Provide documentation supporting the non-labor increases for 2018.

SDG&E Response 02-26:

The non-labor increase in 2018 references a one-time Fueling Our Future implementation cost related to IT development for optimizing vegetation management workflow through enhancements to SDGE's Powerworks work management system. The corresponding annual savings of \$84k are reflected in 2018 and 2019 for this workpaper.

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- FEA-02-27. Customer Communication Safety Program. Refer to the response to FEA-01-44.
- a. Provide a description of the media outreach program.
 - b. Provide copies of all documentation supporting the TY 2019 costs for this program.

SDG&E Response 02-27:

- a. As stated in ERO testimony beginning at WHS-38 (see, e.g., WHS-42-43), this program is an expansion of existing targeted communications efforts to inform, raise awareness, and educate the public about what they can do to ensure their safety. The campaign objective is to promote: safety around downed power lines, tree trimming safety, electric safety, Dig Alert (calling 8-1-1), the dangers of back feed, and safety for children. For broader awareness and sustained education, mass media channels – such as TV, radio, newspaper and digital – are recommended to run or air each quarter in 2019. This safety campaign is aimed at many target audiences –homeowners/renters, children, contractors, people who live in areas with overhead power lines, and net energy metering customers. The campaign will speak to major ethnic groups that make up our customer demographics, specific messaging and content will be created for these target audiences and messaging will utilize multiple channels, some in-language. For this campaign, mass media - TV, radio, newspaper, digital, billboards – will be used to create awareness as well as direct communication - mail, emails – to reach the target audiences. Social media will also be used as an additional channel. This campaign proposes a layered and integrated approach, with a message to visit the enhanced safety section of SDG&E’s website for more information. The campaign forecast includes estimates for both production and media. Production cost estimates include the costs to create video content, which can then be tailored to thirty second television spots. Production costs are also included for billboards and development of new web content. Estimated costs are based on historical projects and media buys from past advertising campaigns. In addition, estimates include costs outlined for direct communication – emails and mailings.

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SDG&E Response 02-27 Continued:

b. All documentation can be found in the following: SDG&E-15-R which 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). Below we have provided a breakdown of TY 2019 costs for this program (costs are in 2016 whole dollars):

Public Safety Campaign							
		2017		2018		2019	
Videos							The individual estimates are based on previous videos produced and created. Costs include: concepting, scriptwriting, filming or animation, editing, and post production. Videos will be similar in style so there is consistency in look and feel.
Safety around downed power lines		\$0		\$0		\$50,000	
Tree trimming		\$0		\$0		\$50,000	
Electric Safety		\$0		\$0		\$50,000	
Furnace/Carbon Monoxide Safety		\$0		\$0		\$50,000	
Dig Alert, call 8-1-1		\$0		\$0		\$50,000	
Dangers of Reverse Power Flow		\$0		\$0		\$50,000	
Safety for kids		\$0		\$0		\$50,000	
Total		\$0		\$0		\$350,000	
TV spots							This estimate is for TV spots is based on cut downs of seven videos that will need to be cut down into :30 spots. Costs include: script revisions, voice over, editing and post production.
Cut downs from videos (5-7 spots)		\$0		\$0		\$105,000	
Total		\$0		\$0		\$105,000	
Billboards							
Creative/Production (5-7 boards)		\$0		\$0		\$100,000	Seven billboards would cost roughly \$14,285 to produce. This includes concepting,

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							revisions and execution (producing final art files).
Placement (avg \$50K/board x 3 boards per month)		\$0		\$0		\$1,800,000	The \$50K/board costs are based on historical costs charged by outdoor vendor. Three boards = \$150K/month x 12 months = \$1,800,000
Total		\$0		\$0		\$1,900,000	
<u>Advertising</u>							
Planning		\$0		\$0		\$40,000	Media and agency time to develop and monitor campaign. Includes both traditional and digital agencies. Recommendations are based on campaign objective and target audiences.
TV media (four, six-week flights)		\$0		\$0		\$2,000,000	\$500K spend per flight. Spend at 180-200 GRPs (Gross Ratings Points) per flight. Four flights in a year = \$2,000,000.
Radio production and media (four, six-week flights)		\$0		\$0		\$800,000	\$70K for development or seven spots, \$30K for radio ID development. \$175K spend per flight. Four flights in a year = \$700,000.
Newspaper production and media includes U-T + ethnic & community pubs (four, six-week flights)		\$0		\$0		\$600,000	\$100K in print ad development & creation of multiple ads (in various languages). \$125K spend per flight. Four flights in a year = \$500,000.
Digital production and media (four, six-week flights)		\$0		\$0		\$430,000	\$80K in digital ad development & creation of multiple ads. \$87,500 spend per flight. Four flights in a year = \$350,000.
Total		\$0		\$0		\$3,870,000	
<u>Direct Communication</u>							
Email/Direct Mail (2xs per year)		\$0		\$0		\$100,000	\$5K/email to 500,000 customers. 2xs = \$10K. \$90K to mail one time.
Total		\$0		\$0		\$100,000	
<u>Collateral</u>							
Brochures/fact sheets/pocket cards		\$0		\$0		\$30,000	Creation and development of multiple pieces by topic. Six pieces @ \$5K/piece. This includes: copyrighting, design and printing. Pieces could be in multiple languages.
Total		\$0		\$0		\$30,000	
<u>Website (sdge.com)</u>							
Content development		\$0		\$0		\$75,000	Agency costs for microsite concepting, creation and development. URL used in advertising.
Paid Social Media		\$0		\$0		\$25,000	Run paid posts four times a year, same time advertising runs. \$6,250 per flight.
Total		\$0		\$0		\$100,000	
GRAND TOTAL							
		\$0		\$0		\$6,000,000	
		2019 TOTAL = \$6,000	\$6,000,000				

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FEA-02-28. Refer to the attachment provided in response to FEA-01-47 and Exhibit No. SDG&E-15-WP page 14. a) Please explain the reason for the significant variance between the 2016 authorized amount of \$16 million and the actual amount of \$5.363. b) Provide the 2017 actual spending for construction services and explain the reasons for any variance over 10% between the actual and authorized expenses.

SDG&E Response 02-28:

- a. There were several drivers behind the less-than-authorized spending in 2016. Two organizations that were part of the Construction Services Workpaper during the 2016 GRC are now included in a different workpaper. Specifically, the Aviation Services Department and the Fire Coordination & Prevention organizations are now within the Emergency Management workpaper. Together, these two groups had a combined spend of \$2.225M. In addition, a reprioritization of efforts related to the Fire Risk Mitigation (FiRM) program has led to a shift from O&M-intensive activities to Capital-intensive activities, which contributed to the majority of the underrun. Specifically, at the time of the TY2016 forecast, FiRM had planned to do a large-scale O&M survey and engineering analysis on the lines and structures within the HRFA. However, as the project ramped up, the primary risk reduction activity of replacing conductor with known high failure rates escalated in priority over the analysis, conductor replacement is primarily a capital activity.
- b. The 2017 actuals for construction services totaled \$ 6,014,353. The reason for the variance is the same as in part a.

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A&G EXPENSES

FEA-02-29. Liability Insurance. For each of the Liability Insurance categories discussed on pages NKC-8 through NKC-13 of Exhibit SDG&E-27, provide the coverage limit and deductibles for each year 2012, 2013, 2014, 2015, 2016 and 2017.

SDG&E Response 02-29:

See the Confidential attachment, “CONFIDENTIAL- FEA-002 Q29 Summary Insurance Limits and Deductibles.pdf.” This attachment is considered ***Confidential and Protected Pursuant to PUC Section 583, General Order 66-D, and D17-09-023.***

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FEA-02-30. Liability Insurance. Refer to FEA-01-37, Attachment FEA-01-37, page 1.
Explain the substantial increase in excess liability expense in 2016 over 2015.

SDG&E Response 02-30:

Year-over-year general excess liability premiums are influenced by several factors which include Sempra-specific factors, the global insurance marketplace, and changes in available insurance capacity. Significant worldwide insurance losses can negatively impact premiums. Generally, each insurance carrier uses proprietary models to calculate their required premiums for each specific insured. SDG&E and SoCalGas believe that the excess liability expense increase in 2016 over 2015 was driven in part by the factors identified above, although we are not able to attribute the increase to any one of these specific factors because we do not have access to insurance companies' proprietary models. In addition, approximately \$13M of the increase from 2015 to 2016 was for a one-time reinstatement insurance premium charge due to Aliso, which was removed from this GRC.

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FEA-02-31. Liability Insurance. Refer to FEA-01-37, Attachment FEA-01-37, page 1.
Explain the decrease in excess liability expense in 2017 over 2016.

SDG&E Response 02-31:

See the response to FEA-02-30 above for some of the factors that can influence year-over-year general excess liability premiums and why we are not able to attribute increases or decreases to any one specific factor (because we don't have access to insurance companies' proprietary models). As further explained above in response to FEA-02-30, reinstatement insurance expenses have been excluded from this TY2019 GRC request. 2018 and 2019 forecasts were based on 2017 general excess liability premiums, which were known to us by the time we submitted our October 6, 2017 application and testimony (as outlined in the workpapers).

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FEA-02-32. Claims. Refer to page SKH-23, lines 26-27 of Exhibit SDG&E-31.

- a. Provide an explanation for the spike in claims in 2016.
- b. Identify any claims paid over \$100,000 in 2016 with a description of the lawsuit.

SDG&E Response 02-32:

- a. Please see the Direct Testimony of Sandra Hrna (Exhibit SDG&E-31) for a description of the variance reflected in 2016 Claims data. Claims payments are a function of total number of claims and the amount of the claim. SDG&E is unable to identify a specific reason for the increase in total claim payments in 2016 other than the variability we often experience from year to year.
- b. Please see attached document: “FEA-SDGE-02-SKH Q32b CONFIDENTIAL.xlsx”. The shaded areas in the attachment are considered **Confidential and Protected Materials Pursuant to PUC Section 583, GO 66D, and D.17-09-023.**

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FEA-02-33. Claims. Refer to page SKH-23, lines 20-21 of Exhibit SDG&E-31. Identify the amount of the costs for outside experts included in claims expense for each year 2012, 2013, 2014, 2015, 2016 and 2017 along with an explanation of the nature of the services provided.

SDG&E Response 02-33:

Please see attached document: “FEA-SDGE-02-SKH Q33 CONFIDENTIAL.xlsx”. The shaded areas in the attachment are considered **Confidential and Protected Materials Pursuant to PUC Section 583, GO 66D, and D.17-09-023.**

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FEA-02-34. Claims. Identify all pending claims over \$50,000 and a brief description of each claim.

SDG&E Response 02-34:

Below are the pending claims over \$50,000.

Claim	Claim Type
271923	Property Damage
261596	Property Damage
270520	Property Damage
264306	Property Damage
284142	Personal Injury

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FEA-02-35. Workers compensation. Refer to FEA-01-37, Attachment FEA-01-37 page 6.

- a. Provide the number of claims for each of the years 2012, 2013, 2014, 2015, 2016, and 2017.
- b. Identify all payouts over \$50,000 for each of the years 2012, 2013, 2014, 2015, 2016, and 2017.

SDG&E Response 02-35:

Total number of new SDG&E workers' compensation claims received for each of the years 2012, 2013, 2014, 2015, 2016, and 2017 are shown in the table below. These include claims by Desert Star employees.

Year	Total SDG&E Workers' Compensation Claims Received
2012	172
2013	147
2014	131
2015	127
2016	131
2017	109
Grand Total	817

The number of instances where a single payout exceeded \$50,000, in any given year, are shown in the table below.

Year	Total Number of Single Payments Made in Excess of \$50,000
2012	4
2013	1
2014	5
2015	2
2016	7
2017	5
Grand Total	24

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FEA-02-36. Workers compensation. Refer to the response to FEA-01-41.

- a. Please explain the reason for the increased premium to workers compensation expense.
- b. Identify any changes made to the policy renewed on June 26, 2017 over the policy from the previous year.

SDG&E Response 02-36:

- a. The cause of the 2017 premium increase was largely driven by increase in Sempra payroll from prior year and insurance carrier rate increases. In general, workers compensation premiums are calculated by multiplying annual payroll by insurer rates. Rationale behind insurance carrier generated rates is proprietary to each insurance carrier.

The 2018 and 2019 forecasts use as their starting point the 2017 actual renewal premium escalated by the broker recommendation set forth in Appendix B of the testimony.

- b. There were no changes made to the policy renewed on June 26, 2017 over the policy from the previous years.

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CAPITAL EXPENDITURES

FEA-02-37. Electric distribution capital. Refer to the response to FEA 01-48.

- a. Please explain the reason for the variance between the planned and actual expenditures for each of the following years: 2014, 2015, 2016, and 2017.
- b. Please explain the reason for the increase in expenditures in 2016 over 2015.
- c. Please explain the reason for the increase in expenditures in 2017 over 2016.

SDG&E Response 02-37:

- a. Actual costs can vary from forecasts for a variety of reasons including changing priorities, emergent work, changes in project scope and schedule, permitting changes and the like. SDG&E does not record detailed explanations for those variances.
- b. Yearly and year over year variances can be caused by a variety of reasons, such as inflation, changing priorities, emergent work, project start and completion dates, changes in project scope and schedule, and permitting changes.
- c. See response to b.

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FEA-02-38. Electric distribution capital expenditures. Refer to the attachment provided in response to FEA 01-53. Provide the amounts requested for each category in the 2016 and 2012 GRC's.

SDG&E Response 02-38:

The capital expenditures summary of costs requested in the 2016 and 2012 GRCs is shown below.

2016 GRC – Figures shown are shown in thousands of 2013 dollars

ELECTRIC DISTRIBUTION				
Figures Shown in Thousands of 2013 Dollars				
CATEGORIES OF MANAGEMENT		Estimated 2014	Estimated 2015	Estimated 2016
A	CAPACITY/EXPANSION	50,655	31,282	14,241
B	EQUIP/TOOLS/MISC	1,372	1,372	1,372
C	FRANCHISE	41,764	41,764	41,764
D	MANDATED	37,872	38,148	39,063
E	MATERIALS	21,024	22,025	23,027
F	NEW BUSINESS	58,592	70,653	81,962
G	OVERHEAD POOLS	108,552	118,357	110,224
H	RELIABILITY/IMPROVEMENTS	81,848	102,934	74,427
I	SAFETY AND RISK MANAGEMENT	26,209	40,684	75,423
J	SMART METER PROGRAM	1,116	0	0
K	TRANSMISSION/FERC DRIVEN PROJECTS	14,608	19,180	12,530
Totals⁷		443,612	486,399	474,033

2012 GRC – Figures shown are shown in thousands of 2009 dollars

	Year			
	2010	2011	2012	
Category	GRC Forecast	GRC Forecast	GRC Forecast	Total
Capacity/Expansion	\$19,128	\$47,080	\$26,802	\$93,010
Franchise	\$19,060	\$19,175	\$18,318	\$56,553
Mandated	\$31,999	\$35,987	\$34,220	\$102,206
New Business	\$61,604	\$80,981	\$89,977	\$232,562
Reliability	\$55,876	\$54,816	\$65,634	\$176,326
Fire Hardening Specific	\$2,656	\$8,036	\$17,479	\$28,171
Total	\$190,322	\$246,075	\$252,430	\$688,828

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FEA-02-39. Electric distribution capital expenditures. Refer to the responses to FEA 01-48 and 01-53. For each of the years 2012, 2013, 2014, 2015 and 2016, provide an explanation of the difference between the total authorized amounts (FEA 01-53) and the planned amounts (FEA 01-48).

SDG&E Response 02-39:

The table in FEA-01-48 is expressed in nominal\$ and includes overheads while the table provided for FEA-01-53 is in either 2013\$ (for values 2014-2016) or 2009\$ (for values 2011 and 2012) and does not include overheads. Planned amounts are used for internal budget management and while tied to authorized amounts, may vary due to emergent work, changed priorities or reallocations between budget activities. SDG&E does not record detailed reallocations between budgets. For a comparison of planned and actual values with overheads, please see the accompanying file, “FEA-DR-02- Q39 2012 through 2016 Variance Reports.xlsx”. Note the format for the actual versus planned reports changed in 2016.

Please note that these reports are in nominal dollars (dollars of the year), and where it reads YTD these reports are for the full year shown. In contrast to the testimony presentation of direct labor and direct nonlabor, these variance reports show ‘fully loaded’ cost comparisons with the exception of AFUDC.

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FEA-02-40. Electric distribution capital expenditures. Refer to Appendix A of Exhibit SDG&E-14-R and the response to FEA-01-48. Please explain the difference between the 2017 planned amount of \$544,216 and the 2017 total distribution capital of \$445,116.

SDG&E Response 02-40:

The values in the table provided for FEA-01-48, \$544,216,000, include overheads, while the values shown in Appendix A of Exhibit SDG&E-14-R, \$445,116,000 are in direct dollars without overheads. For a comparison of forecasted and actual values with overheads, please see the accompanying file, “FEA-DR-02-Q40 2017 Variance Report.xlsx,” which shows forecasted at \$544,216,000 and actual at \$558,769,000.

Please note that this report is in nominal dollars (dollars of the year), and where it reads YTD this report is for the full year shown. In contrast to the testimony presentation of direct labor and direct nonlabor, this variance report shows “fully loaded” cost comparisons, with the exception of AFUDC.

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FEA-02-41. Electric distribution capital expenditures. Refer to the response to FEA-01-48. Provide copies of the internal budget variance reports supporting the amounts provided.

SDG&E Response 02-41:

See accompanying files provided in response to questions FEA-02-39 and FEA 02-40.

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- FEA-02-42. Delayed projects. Refer to the response to FEA-01-49. Provide the project start dates for the following projects:
- a. Salt Creek Substation & New circuits (Budget 2258)
 - b. Rebuild Kearny 69/12KV Substation.(Budget 13242)

SDG&E Response 02-42:

- a. Budget 2258 project construction start date: 3rd quarter 2016
- b. Budget 13242 project construction start date: 4th quarter 2017

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MISCELLANEOUS

FEA-02-43. Refer to page 8 of the March 2018 Safety and Enforcement Division SB 900 Incidents and Audits Report. Provide an explanation of how the Company forecasted the electric incidents into the TY 2019. Identify the Exhibits where related costs are contained.

SDG&E Response 02-43:

SDG&E objects to this request as vague, ambiguous, and unintelligible. SDG&E refers FEA to its RAMP Report presenting SDG&E's mitigation plans to address safety risks, and its GRC testimony chapters presenting SDG&E's cost forecasts to implement RAMP activities.

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FEA-02-44. Master Data Request. Please provide SDG&E's responses to the Master Data Request.

SDG&E Response 02-44:

The SDG&E Master Data Request responses are provided on accompanying Flash Drives.

Confidential responses and attachments are marked as **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023, and are accompanied by supporting declarations.** Access to such Protected Materials is restricted to those Reviewing Representatives who have signed the Non-Disclosure Certificate in ALJ Lirag's December 13, 2017 Protective Order.