

**ORA DATA REQUEST
ORA-SDGE-067-MRK
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 22, 2017
DATE RESPONDED: JANUARY 10, 2018**

Exhibit Reference: SDG&E-40
SDG&E Witness: Eric Dalton
Subject: Miscellaneous Revenues

Please provide the following:

1. On 12/07/2017, Sempra sent ORA its response to data request ORA-SDGE-026-MRK, which requested a working spreadsheet. The memo sent by Kelly Hart to ORA on November 30, 2017, to summarize the amended understanding of what SDG&E would provide in its response to ORA-SDGE-026-MRK, stated that (1) “SoCalGas and SDG&E will each separately provide a spreadsheet that contains the adjusted-recorded data for 2012-2016 for those capital budget codes that contain projects with CIAC expenses. The data will be broken out by labor and nonlabor and will total the entire dollar amount for those budget codes.” and (2) “SoCalGas and SDG&E will each separately provide a second spreadsheet that reflects the adjusted-recorded CIAC specific data for 2012-2016 sorted by budget code (a subset of the data provided in response to question #1). The data will be broken out by labor and non-labor and should total the dollar amounts provided in ORA-SCG-012-MRK Q1 and also ORA-SDG&E-019-MRK.”

SDG&E only provided one spreadsheet, not two. Did SDG&E intend to subsume the two spreadsheets it should have provided, into the two separate tabs “Q1 Budget Codes” and “Q2 CIAC Deposits by BC” of the spreadsheet “ORA-SDG&E-26-MRK Attachment.xlsx”? If that is the case, will SDG&E please confirm that “Q1 Budget Codes” is supposed to answer #1 and “Q2 CIAC Deposits by BC” is supposed to answer #2?

SDG&E Response 1:

SDG&E provided one file in response to ORA-SDG&E-026-MRK that contained two spreadsheets. As further clarified in response to ORA-SDG&E-060-MRK, but repeated here for convenience, the file contained:

- Tab Q1 – Reflects total direct capital expenses incurred on the budget codes that contain CIAC projects. This tab does not include overheads, CIAC credits for deposits received or related O&M expenses. This data is not exclusively CIAC capital, it’s total capital as agreed to in the email sent to ORA on November 29, 2017.
- Tab Q2 – Reflects the total CIAC deposits received summarized by budget code and totals the credits provided in response to ORA-SDG&E-019-MRK. As further explained in response to ORA-SDG&E-060-MRK this data is not available with labor and non-labor details because it is not recorded that way in the general ledger. The file provided as an attachment to ORA-SCG-060-MRK further provided sub-totals using formulas on the Data tab.

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2. ORA is unable to find where SDG&E has provided the computations leading to a summary table which matches “the dollar amounts provided in ORA-SDG&E-019-MRK.” Has that table been provided? If not, will SDG&E please provide a spreadsheet which reflects the adjusted recorded CIAC specific data for 2012-2016 sorted by budget code, broken out by labor and non-labor, and matching the dollar amount FERC totals provided in ORA-SCG-012-MRK Q1 and also ORA-SDG&E-019-MRK. Q1? If this is not possible, please explain why.

SDG&E Response 2:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the ground that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and further on the ground that the burden and intrusiveness of this request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. SDG&E has not requested a revenue requirement for CIAC construction costs. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Furthermore, it is estimated that compilation of the data requested would take one individual approximately 6 weeks of full-time work.

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3. In the tab “Q1 Budget Codes” of the spreadsheet “ORA-SDG&E-26-MRK Attachment.xlsx” sent in response to data request SDG&E-026-MRK, it is stated that “there are CIAC deposits shown on the Q2 CIAC by BC tab that don’t have a corresponding GRC workpaper shown below”. Does this mean that the Budget Code totals in the “Q1 Budget Codes” tab are inconsistent with the CIAC totals in provided in ORA-SDG&E-019-MRK Q1 in that the annual spreadsheet totals provided in response to ORA-SDG&E-019-MRK Q1 include all CIAC deposits and costs, while the Budget Code totals provided in the tab “Q1 Budget Codes” do not? Please explain why the numbers in the “Q1 Budget Codes” tab, if aggregated to FERC categories, will not match the dollar amounts provided in ORA-SDG&E-019-MRK, if that is the case? Please provide such aggregations to FERC level whether they match or do not match the FERC dollar amounts provided in ORA-SDG&E-019-MRK. Please provide an account of how SDG&E would interpret such totals.

SDG&E Response 3:

SDG&E has not provided CIAC total job constructions costs incurred, by budget code, in any previous data request responses. ORA-SDG&E-019-MRK provided annual CIAC deposit amounts as well as those deposit amounts allocated to FERC accounts, but no constructions costs.

Yes, the data provided in ORA-SDG&E-026-MRK Q1 is inconsistent with the data provided in ORA-SDG&E-019-MRK for the reasons stated above; however, the CIAC deposits are consistent throughout all data request responses.

As described above, in ORA-SDG&E-060-MRK, and in Q1 of this data request the dollars on the Q1 Budget Code tab of ORA-SDG&E-026-MRK will not match any previous response provided in response to the CIAC queries.

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4. Does the tab “Q2 CIAC Deposits by BC” include all CIAC deposits? If not, please characterize the CIAC deposits not included in the tab and why they were not included. Please explain what portion of CIAC deposits are included in the Budget Code totals provided in the tab “Q1 Budget Codes”. If not all CIAC deposits are included in the Budget Code totals provided in the tab “Q1 Budget Codes” then please provide an additional spreadsheet which computes annual Budget Code totals for the years 2012 to 2016. If possible, please also provide a breakdown by labor vs non-labor for these totals. If this is not possible, please explain why.

SDG&E Response 4:

Yes, the tab Q2 CIAC Deposits by BC includes all CIAC deposits received. None of the deposits are included in Q1 Budget Codes. As stated in response to Q1, CIAC deposit information is not available broken out by labor and non-labor.

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5. Does the tab “ORA–SDG&E-026 Data” include data regarding the labor vs non-labor split for CIAC deposits? If not, then how were the labor vs non-labor splits in the tab “Q1 Budget Codes” derived? If the tab “ORA–SDG&E-026 Data” includes data regarding the labor vs nonlabor split for CIAC deposits please provide examples of this kind of data in the tab and explain how it is used.

SDG&E Response 5:

See response to question 1.

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6. Please ensure that all spreadsheets sent to ORA in order to answer the questions above are working spreadsheets, having all summary/aggregated numerical cell entries computed by Excel calculations based on raw data such as provided in the tab “ORA–SDG&E-026 Data”.

SDG&E Response 6:

Not applicable