## SCGC-SEU DATA REQUEST-004 SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8 SEU RESPONSE

DATE RECEIVED: APRIL 10, 2018 DATE RESPONDED: APRIL 25, 2018 DATE AMENDED: APRIL 30, 2018

### Regarding SDG&E-18: Customer Service Office Operations

- **4.7.** With respect to the statement on page JDS-65: "The Smart Meter Systems Upgrade project will upgrade the CE and MDMS and associated database hardware in order to reduce the risk of catastrophic system failure and avoid significant costs associated with system recovery and lost revenue."
- **4.7.6.** How many times per day will the CE collect data from the gas meters under the proposed system?
- **4.7.7.** At what times each day will the CE collect data from the gas meters under the proposed system?
- **4.7.12.** Under the proposed system, will the MDMS data contain all of the hourly metering history that is available for a given gas meter module identifier (or gas meter identifier) in addition to the hourly metering data for that gas meter module

### Amended Utility Responses 4.6, 4.7, and 4.12:

**4.7.6** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes to the proposed system. See Testimony of Jerry Stewart Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

**4.7.7** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes to the proposed system. See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

**4.7.12** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request lacks foundation and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated

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# **Amended Utility Responses Continued:**

to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E does not collect hourly gas meter data. There will be no changes to the proposed system. See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.