

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &  
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR  
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE  
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

**(A.18-07-024)**

**(DATA REQUEST TURN-SEU-05)**

**DATA RECEIVED: 2-26-19**

**DATE RESPONDED: 3-12-19**

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**QUESTION 1:**

Please provide in electronic format the following bill frequency information for residential customers other than master-metered customers for SoCalGas: Bill frequencies in 10 therm per year intervals showing the number of customers and amount of energy used within each interval annually and used in each of the 12 months. Produce separate bill frequencies for single-family and multi-family residential customers, with each of single-family and multi-family further subdivided into CARE and Non-CARE customers. If the CARE and non-CARE figures cannot be subdivided into single-family and multi-family, produce aggregate data for CARE and non-CARE.

**RESPONSE 1:**

See Attachment #1 for annual data. Monthly data is forthcoming.

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**QUESTION 2:**

For SoCalGas:

- a. What is the residential class median consumption (in therms) for each month?
- b. What is the residential single-family median consumption (in therms) for each month?
- c. What is the residential multi-family median consumption (in therms) for each month?
- d. What is the residential CARE median consumption (in therms) for each month?

**RESPONSE 2:**

See Attachment #2.

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**QUESTION 3:**

Regarding relationship of usage to class average consumption, provide the following information for SoCalGas:

- a. What is the residential class average consumption (in therms) for each month? In each of those months, please state the number of residential customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- b. What is the residential single-family average consumption (in therms) for each month? In each of those months, please state the number of residential single-family customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- c. What is the residential multi-family average consumption (in therms) for each month? In each of those months, please state the number of residential multifamily customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- d. What is the residential CARE average consumption (in therms) for each month? In each of those months, please state the number of residential CARE customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

**RESPONSE 3:**

See Attachment #3.

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**QUESTION 4:**

Please provide detailed workpapers supporting Chart 1 (SoCalGas) on page 19 of Mr. Chaudhury's testimony.

**RESPONSE 4:**

These workpapers were already submitted. Specifically, see page 380 of 525 in the Chapter 12 workpapers, as well as the Chapter 12 workpaper file titled "SCG TCAP Bill Impact Summary – CARE.xlsx."

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**QUESTION 5:**

Please provide in electronic formats the following bill frequency information for residential customers other than master-metered customers for SDG&E: Bill frequencies in 10 therm per year intervals showing the number of customers and amount of energy used within each interval annually and used in each of the 12 months. Produce separate bill frequencies for single-family and multi-family residential customers, with each of single-family and multi-family further subdivided into CARE and Non-CARE customers. If the CARE and non-CARE figures cannot be subdivided into single-family and multifamily, produce aggregate data for CARE and non-CARE.

**RESPONSE 5:**

See Attachment #5 for annual data. Monthly data is forthcoming.

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**QUESTION 6:**

For SDG&E:

- a. What is the residential class median consumption (in therms) for each month?
- b. What is the residential single-family median consumption (in therms) for each month?
- c. What is the residential multi-family median consumption (in therms) for each month?
- d. What is the residential CARE median consumption (in therms) for each month?

**RESPONSE 6:**

See Attachment #6.

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**QUESTION 7:**

Regarding relationship of usage to class average consumption, provide the following information for SDG&E:

- a. What is the residential class average consumption (in therms) for each month? In each of those months, please state the number of residential customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- b. What is the residential single-family average consumption (in therms) for each month? In each of those months, please state the number of residential single-family customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- c. What is the residential multi-family average consumption (in therms) for each month? In each of those months, please state the number of residential multifamily customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.
- d. What is the residential CARE average consumption (in therms) for each month? In each of those months, please state the number of residential CARE customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

**RESPONSE 7:**

See Attachment #7.

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**QUESTION 8:**

Please provide detailed workpapers supporting Chart 2 (SDG&E) on page 22 of Mr. Chaudhury's testimony.

**RESPONSE 8:**

These workpapers were already submitted. Specifically, see page 515 of 525 in the Chapter 12 workpapers, as well as the Chapter 12 workpaper file titled "SDG&E TCAP Bill Impact Summary – CARE.xlsx."



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**QUESTION 9:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E for its internal decision-making purposes regarding the proposed residential customer charge.

**RESPONSE 9:**

See Attachment #9A and Attachment #9B.

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**QUESTION 10:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E regarding customer acceptance of the proposed residential customer charge.

**RESPONSE 10:**

No analyses, reports, or other documents were prepared by or on behalf of SoCalGas or SDG&E regarding customer acceptance of the proposed residential customer charge.

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**QUESTION 11:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E regarding education and outreach plans for the proposed residential customer charge.

**RESPONSE 11:**

No analyses, reports, or other documents were prepared by or on behalf of SoCalGas or SDG&E regarding education and outreach plans for the proposed residential customer charge.

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**QUESTION 12:**

Has either SoCalGas or SDG&E performed any analysis of the impact of the proposed customer charge increases on usage conservation, other than the material included in its prepared testimony and workpapers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the impact of the proposed customer charge increase on usage conservation.

**RESPONSE 12:**

Neither SoCalGas nor SDG&E has performed any analysis of the impact of the proposed customer charge increases on usage conservation, other than the material included in its prepared testimony and workpapers. Applicants note that CPUC has determined that the impact on usage conservation associated with residential customer charge is likely to be small (D.15-07-001, "*Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations*", at page 214).

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**QUESTION 13:**

Has either SoCalGas or SDG&E performed any analysis of the bill impacts of the proposed customer charge, other than the material included in its prepared testimony and workpapers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the bill impacts of the proposed customer charge increase.

**RESPONSE 13:**

In response to CalPA data request 11, question 3, the Applicants have evaluated the bill impacts of their proposed \$10 per month customer charge and compensating lower volumetric rates on residential non-CARE customers. See the attached files.



SDGE TCAP Bill  
Impact Summary - Non-CARE

SDG&E:



SCG TCAP Bill Impact  
Summary - Non-CARE

SoCalGas:

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**QUESTION 14:**

Has either SoCalGas or SDG&E performed any analysis of whether there is any correlation of household income and gas consumption for its residential customers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the analysis of whether there is any correlation of household income and gas consumption for its residential customers.

**RESPONSE 14:**

Neither SoCalGas nor SDG&E has performed any analysis of whether there is any correlation of household income and gas consumption for its residential customers.

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**QUESTION 15:**

For each utility, please identify by name and job title each person or persons responsible for:

- a. Deciding to propose either the customer charge increase (for SoCalGas) or establishment (for SDG&E) in this proceeding;
- b. Deciding the level of customer charge to ultimately propose in this proceeding;
- c. Providing the highest level of management review and approval for both the customer charge proposals in this proceeding; and
- d. Determining whether the utilities had presented a sufficiently-supported showing in direct testimony and workpapers in support of the customer charge proposals.

**RESPONSE 15:**

- a. All of the Applicants' proposals, including customer charge proposals, were presented to a steering committee which consisted of the following business officers:
  - Bret Lane – COO and President, SoCalGas
  - Rodger Schwecke – Senior Vice President, Gas Transmission, Storage and Engineering
  - Gillian Wright – Vice President, Chief Human Resources Officer
  - Sharon Tomkins – Vice President, Customer Solutions and Strategy
  - Paul Goldstein – Vice President, Customer Services
  - Jawaad Malik – Vice President, Gas Acquisition
  - Neil Navin – Vice President, Gas Transmission and Storage
  - Dan Skopec – Vice President, Regulatory Affairs
  - Bruce Folkmann – Vice President, Controller & CFO
- b. See response to 16.a.
- c. See response to 16.a.
- d. Sharim Chaudhury.