SCG-23-R (SCG Fleet) and SDG&E-21-R (SDG&E Fleet)
1. Please identify the 2017 recorded values for each line item on pages 12, 23, 30, and 38 of SDG&E-21-WP.

Utility Response 1:

SDG&Es objects to this request on the grounds that it is unduly burdensome. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. There are no instructions or requirements in the Rate Case Plan regarding the provision of Base Year + 1 data (in this case 2017 data). Nonetheless, SDG&E provided 2017 data in the 2017 Recorded-Adjusted Capital Expenditure file submitted to TURN on March 22, 2018 in the format nearly identical to what was provided in the 2016 General Rate Case for Base Year + 1 data. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

SDG&E does not track expenses for Amortization, Interest, Salvage, License Fees, and Sales tax at the level of detail requested.

2. Please identify the 2017 recorded values for each line item on pages 12, 24, 31, and 38 of SCG-23-WP.

Utility Response 2:

SoCalGas objects to this request on the grounds that it is unduly burdensome. SoCalGas is not required to create new data or present existing data in a different form beyond that which might be readily available. There are no instructions or requirements in the Rate Case Plan regarding the provision of Base Year + 1 data (in this case 2017 data). Nonetheless, SoCalGas provided 2017 data in the 2017 Recorded-Adjusted Capital Expenditure file submitted to TURN on March 22, 2018 in the format nearly identical to what was provided in the 2016 General Rate Case for Base Year + 1 data. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas does not track expenses for Amortization, Interest, Salvage, and License Fees & Sales tax at the level of detail requested.

3. Regarding TURN_DR-026-Q-Cash Flow Model SDGE CONFIDENTIAL.xlsx and TURN_DR-026-Q-Cash Flow Model SDGE C CONFIDENTIAL.xlsx, which are attached to TURN-SEU-26-1:

    a.   Please disaggregate the values on the "In-Process_Forecast" tab into values for each subprogram—i.e., Current Fleet, Fleet Replacements 2017-2019, Incremental Fleet for Business Needs, Incremental Fleet for Business Needs Fueling our Future (FOF) 250, Premium for Alternative Fuel Vehicles (AFV) Replacements, and ATCM Vehicles, which are listed on pp. 12 of SDG&E-21-WP.

    b.   Please disaggregate the values on the "Eligible_Forecast" tab into ATCM units and non-ATCM units.

    c.   Please disaggregate the values on the "Backlog_Forecast" tab into ATCM units and non-ATCM units.

Utility Response 3:

a. SDG&E objects to this request on the grounds that it is unduly burdensome. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SDG&E responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SDG&E-21WP, pages 12 and 13.

b. SDG&E objects to this request on the grounds that it is unduly burdensome. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SDG&E responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SDG&E-21WP, pages 12 and 13.

c. SDG&E objects to this request on the grounds that it is unduly burdensome. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SDG&E responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SDG&E-21WP, pages 12 and 13.

4. Regarding TURN_DR-026-Q-Cash Flow Model SCG C CONFIDENTIAL.xlsx, which is attached to TURN-SEU-26-1:

    a.   Please disaggregate the values on the "In-Process_Forecast" tab into values for each item subprogram—i.e., Current Fleet, Fleet Replacements 2017-2019, Incremental Fleet for Business Needs, Incremental Fleet for Business Needs RAMP, Premium for Alternative Fuel Vehicles (AFV) Replacements, and ATCM Vehicles, which are listed on pp. 12 of SCG-23-WP.

    b.   Please disaggregate the values on the "Eligible_Forecast" tab into ATCM units and non-ATCM units.

    c.   Please disaggregate the values on the "Backlog_Forecast" tab into ATCM units and non-ATCM units.

Utility Response 4:

a. SoCalGas objects to this request on the grounds that it is unduly burdensome. SoCalGas is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SCG-23WP, pages 12, and 24.

b. SoCalGas objects to this request on the grounds that it is unduly burdensome. SoCalGas is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SCG-23WP, pages 12, and 24.

c. SoCalGas objects to this request on the grounds that it is unduly burdensome. SoCalGas is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:
The confidential and proprietary Cash Flow Forecasting Model does not have the functionality to make the requested runs at the level of detail requested. SDG&E has to run the model multiple times in order for SDG&E to develop its values for each of the categories detailed in SCG-23WP, pages 12, and 24.