

TURN DATA REQUEST-082
SDG&E-SOCALGAS 2019 GRC – A.17-10-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: JULY 12, 2018
DATE RESPONDED: JULY 27, 2018

1. In SCG-236, at page 5, ll. 6-8, the testimony states, “The depreciation study process, factors considered, and proposed depreciation parameters for each account are detailed in SoCalGas’ direct testimony and workpapers.” For each of the following accounts, please identify by volume, page and line number (if applicable) where the “factors considered” for purposes of establishing the proposed depreciation parameters appear in SoCalGas’s testimony and workpapers:

- a. Account 367 (Transmission Mains)
- b. Account 376 (Distribution Mains)
- c. Account 380 (Services)
- d. Account 381 (Meters)

Utility Response 1:

SoCalGas objects to the extent that this request is overly broad and unduly burdensome. The burden, expense, and intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, given the timing of the request, and the limited time for response. Notwithstanding and without waiving these objections, the chart below lists the pages in Exhibit SCG-36-R and SCG-36-WP-R that are relevant to the specified accounts.

| Account | Direct Testimony and Workpapers |
|-------------------------------------|---|
| Account 367 (Transmission Mains) | SCG-36-R: 15:20-23; 16:18-21; and A1. SCG-36-WP-R: 143; 162-163; 205-208; 256; and 267. |
| Account 376 (Distribution Mains) | SCG-36-R: 18:3-6; 18:26-29, cont. 19: 1-5; and A1. SCG-36-WP-R: 143; 172-173; 219-221; 256; and 272. |
| Account 380 (Services) | SCG-36-R: 18:3-6; 19:16-20; and A1. SCG-36-WP-R: 143; 176-177; 224-226; 256; and 274. |
| Account 381 (Meters) | SCG-36-R: 18:3-6; 19:23-28; and A1. SCG-36-WP-R: 143; 178-179; 228-229; 256; and 275. |

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2. In SCG-236, at page 5, ll. 11-15, the testimony states (repeating a passage from SoCalGas’s direct testimony), “The service life and curve dispersion selections and estimated net salvage rates for each account were derived from statistical analyses of historical data, visual matching to Iowa curves, informed judgment, discussions with field personnel, and expectations about the future projection of life and dispersion curve and net salvage.” For each of the following accounts (Account 367 – Transmission Mains, Account 367 – Distribution Mains, Account 380 – Services, and Account 381 – Meters), please identify by volume, page and line number (if applicable) where each of the following appeared for the specific service life and curve dispersion selection and estimated net salvage rate selected for the account:

- a. Statistical analyses of historical data
- b. Visual matching to Iowa curves
- c. Informed judgment
- d. Discussions with field personnel
- e. Expectations about the future projection of life and dispersion curve, and
- f. Expectations about the future net salvage.

Utility Response 2:

SoCalGas objects that this request is overly broad and unduly burdensome. The burden, expense, and intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, given the timing of the request, and the limited time for response. Notwithstanding and without waiving these objections, please see the response to question 1 above.

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3. In SCG-236, at page 7, ll. 7-8, the testimony states, “These recent escalations were confirmed by interviews with field personnel and limited work order review.” For each of the following accounts (Account 367 – Transmission Mains, Account 367 – Distribution Mains, Account 380 – Services, and Account 381 – Meters), please provide the following information.

- a. Please confirm that the material provided in response to TURN DR 43-1 contains all of the documentation associated with the referenced interviews with field personnel. If there is additional documentation, please provide it.
- b. Please provide a representative sample of the work orders reviewed as part of the “limited work order review” referred to in the testimony.

Utility Response 3:

- a. All relevant documentation was provided in response to TURN DR 43-1.
- b. There was no documentation created during limited work order reviews.

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4. In SCG-236, at page 7, ll. 9-11, the testimony states, “Descriptive information pertaining to capital expenditures, plant growth, plant replacements, and significant changes (e.g., procedures, maintenance, regulatory, etc.) are addressed in chapters sponsored by numerous individual GRC witnesses.” For each of the following accounts (Account 367 – Transmission Mains, Account 367 – Distribution Mains, Account 380 – Services, and Account 381 – Meters), please:

- a. identify by volume, page and line number (if applicable) each place where such descriptive information appears in the testimony and workpapers sponsored by each of these other witnesses; and
- b. identify by volume, page and line number (if applicable) each place in SoCalGas’s direct testimony in SCG-36-R where such descriptive information was described or discussed in terms of its impact on the proposed depreciation parameters.

Utility Response 4:

- a. SoCalGas objects to the extent that this request is overly broad and unduly burdensome. The burden, expense, and intrusiveness of the request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, given the timing of the request, and the limited time for response. SoCalGas further objects to the extent the request seeks information outside the scope of SCG-36-R. Notwithstanding and without waiving these objections, SoCalGas answers that the direct testimony of capital witnesses describes capital expenditures and replacements by projects and budget codes, not by account. Based on project description and budget code, the relevant pages for the specified accounts are listed below. However, the pages listed may be associated with more than the one account. Supplemental workpapers to capital projects are found in corresponding capital workpapers.

| | |
|-------------|---|
| Account 367 | Exhibit SCG-07 (Gas Transmission): pages 8-16, 25-26 Exhibit SCG-14 (Pipeline Integrity for Trans and Dist): pages 28-31 Exhibit SCG-15-R (PSEP): pages 21, 28-34, 38-43, 49-53 |
| Account 376 | Exhibit SCG-04-R (Gas Distribution): pages 91-103, 112-120 Exhibit SCG-14 (Pipeline Integrity for Trans and Dist): pages 28-32 Exhibit SCG-15-R (PSEP): pages 38-41, 43-47, 53 |
| Account 380 | Exhibit SCG-04-R (Gas Distribution): pages 91-96, 104-108 Exhibit SCG-14 (Pipeline Integrity for Trans and Dist): page 32 |
| Account 381 | Exhibit SCG-04 R (Gas Distribution): pages 126-128 |

- b. The proposed depreciation parameters in SoCalGas’ direct testimony in SCG-36-R were not impacted by the testimony of other capital witnesses. Nevertheless, every chapter builds upon every other chapter to support SoCalGas’ application, regardless of whether a chapter specifically cites another chapter.

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5. For each of the following accounts (Account 367 – Transmission Mains, Account 367 – Distribution Mains, Account 380 – Services, and Account 381 – Meters), please briefly describe how SoCalGas determines what portion of the costs of a replacement project are assigned to “cost of removal.” For example, are removal costs tracked and recorded separately from the costs recorded as capital expenditures for the new plant in service? Are the removal costs calculated as a percentage of the total replacement project costs?

Utility Response 5:

Removal costs for capital replacement of gas main and services are calculated as a percentage of the total replacement project costs. The percentage varies by project based on the following factors:

- a) Size, quantity, type of pipe, abandonment, or removal;
- b) Geographical location and related environmental factors of the pipe being removed or abandoned; and
- c) Requirements specified by any laws or ordinances.

There is no cost of removal associated with Account 381 - Meters.