

UCAN DATA REQUEST
UCAN-SDG&E-DR-03
SDG&E 2019 GRC – A.17-10-007
SDG&E PUBLIC RESPONSE
DATE RECEIVED: MARCH 5, 2018
DATE RESPONDED: MARCH 19, 2018

General

1. Please provide actual or estimated Sempra shareholders' rates of return on rate base associated with SDG&E and SoCalGas's CPUC regulated (a) electric and (b) gas operations for each of the years 2015, 2016 and 2017 and please provide supporting documentation and/or calculations for these values.

SDG&E Response 1:

SoCalGas and SDG&E object to this request on the grounds that it is overbroad, unduly burdensome, and outside the scope of testimony. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows: the 2016 information is provided in the Master Data Request Section A Question 3 but was done so at the company level, not by electric and gas operations. The remainder of the requested information does not exist and would be unduly burdensome to create.

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2. Please provide actual 2014 and 2017 capital additions for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 12 on page 12 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 2:

SDG&E submitted revised workpapers, SDG&E-43-R in December of 2017. Data provided in the following responses refer to the revised workpapers. Please see table below for 2014 capital additions using the same categories as provided at the bottom of Table 12. The response is in nominal \$ and 2019\$, and all dollars are in thousands:

	<u>2014 (2014\$)</u>	<u>2014 (2019\$)</u>
Electric Distribution	\$ 408,398	\$ 455,736
Electric Generation	\$ 42,619	\$ 49,471
Gas Distribution	\$ 73,073	\$ 78,763
Total	<u>\$ 524,090</u>	<u>\$ 583,970</u>

For 2017 capital additions, we will not have the data requested in this breakout until after we have filed the 2017 FERC Forms 1 & 2.

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3. Please provide actual annual 2014 and 2017 capital retirements for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 13 on page 13 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 3:

Please see table below for 2014 capital retirements using the same categories as provided at the bottom of Table 13. The response is in nominal \$ and 2019\$, and all dollars are in thousands:

	<u>2014 (2014\$)</u>	<u>2014 (2019\$)</u>
Electric Distribution	\$ 34,855	\$ 38,895
Electric Generation	\$ 278	\$ 323
Gas Distribution	\$ 3,065	\$ 3,304
Total	\$ 38,198	\$ 42,522

For 2017 capital retirements, we will not have the data requested in this breakout until after we have filed the 2017 FERC Forms 1 & 2.

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4. Please provide 2016-2018 capital additions as forecasted and authorized in in SDG&E’s GRC application A.14-11-003 for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 12 on page 12 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 4:

Please see table below for 2016 capital additions as authorized in the Test Year for SDG&E’s GRC application A.14-11-003. For the Post-Test Years (2017-2018), SDG&E settled on an authorized attrition rate which did not have accompanying data for capital additions. All dollars are in thousands.

	<u>2016 (2016\$)</u>	<u>2016 (2019\$)</u>
Electric Distribution	\$ 609,362	\$ 654,824
Electric Generation	\$ 13,142	\$ 14,212
Gas Distribution	\$ 108,048	\$ 119,012
Total	<u>\$ 730,552</u>	<u>\$ 788,048</u>

Please see tables below for 2016-2018 capital additions as forecasted in application A.14-11-003 for electric distribution, electric generation, and gas distribution. These tables can be found in A.14-11-003, testimony of Sandra Hrna (SDG&E-37-R-WP, tables 6, 8 and 10, respectively). The data is not available in 2019\$ as this was part of the 2016 proceeding.

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SDG&E Response 4:-Continued

San Diego Gas and Electric Company
2016 GRC – Revised March 2015
Non-Shared Service Workpapers

Table 6

San Diego Gas and Electric Company
WAVG Rate Base Support: Capital Additions, Capital Retirements, Net Depreciation and Amortization Reserve
ELECTRIC DISTRIBUTION
(Thousands of Dollars)

Line No.	Description	2016 RO Model		2017-2018 Attrition Year						
		End of Year	WAVG	End of Year	WAVG	WAVG Increase	End of Year	WAVG	WAVG Increase	
Plant-in-Service										
1	Beginning of the Year	7,057,107	7,057,107	7,588,087	7,588,087	530,980	8,067,910	8,067,910	479,823	
2	Net Plant Additions	530,980	252,148	479,823	227,855	(24,293)	494,594	234,869	7,014	
3	Total	7,588,087	7,309,255	8,067,910	7,815,942	506,687	8,562,504	8,302,779	486,837	
Accumulated Depreciation Reserve										
4	Beginning of the Year	2,747,595	2,747,595	2,906,991	2,906,991	159,396	3,077,437	3,077,437	170,445	
5	Net Depreciation Reserve	159,396	81,822	170,445	87,494	5,672	181,062	92,944	5,450	
6	Total	2,906,991	2,829,417	3,077,437	2,994,485	165,068	3,258,499	3,170,381	175,895	
Accumulated Amortization Reserve										
7	Beginning of the Year	238,643	238,643	294,559	294,559	55,916	354,351	354,351	59,792	
8	Net Amortization Reserve	55,916	28,262	59,792	30,222	1,959	63,517	32,104	1,882	
9	Total	294,559	266,905	354,351	324,781	57,875	417,868	386,455	61,675	
Escalation Rates to 2016\$										
10		Recorded				Forecast			PTY	
		2010 (2010\$)	2011 (2011\$)	2012 (2012\$)	2013 (2013\$)	2014 (2014\$)	2015 (2015\$)	2016 (2016\$)	2017	2018
		17.120%	12.296%	8.541%	6.012%	4.415%	2.116%	0.000%	2.338%	3.078%
11	Capital Additions (Table 11)	458,807	352,196	436,433	380,272	691,961	539,756	618,475		
12	Capital Additions (2016\$)	537,357	395,501	473,709	403,132	722,512	551,177	618,475		
13	Capital Additions 7-Year Average							528,838	541,203	557,864
14	Capital Retirements (Table 12)					63,162	50,515	62,399		
15	Capital Retirements (2016\$)					65,951	51,584	62,399		
16	Capital Retirements 3-Year Average							59,978	61,380	63,270
17	Net Plant Additions for Ratebase								479,823	494,594

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SDG&E Response 4:-Continued

San Diego Gas and Electric Company
2016 GRC – Revised March 2015
Non-Shared Service Workpapers

Table 8

San Diego Gas and Electric Company
WAVG Rate Base Support: Capital Additions, Capital Retirements, Net Depreciation and Amortization Reserve
ELECTRIC GENERATION
(Thousands of Dollars)

Line No.	Description	2016 RO Model		2017-2018 Attrition Year					
		End of Year	WAVG	End of Year	WAVG	WAVG Increase	End of Year	WAVG	WAVG Increase
Plant-in-Service									
1	Beginning of the Year	1,001,211	1,001,211	1,010,491	1,010,491	9,280	1,084,413	1,084,413	73,922
2	Net Plant Additions	9,280	4,047	73,922	32,240	28,193	76,019	33,155	915
3	Total	1,010,491	1,005,258	1,084,413	1,042,731	37,472	1,160,432	1,117,567	74,837
Accumulated Depreciation Reserve									
4	Beginning of the Year	348,209	348,209	386,162	386,162	37,953	425,529	425,529	39,367
5	Net Depreciation Reserve	37,953	18,954	39,367	19,661	707	42,193	21,072	1,411
6	Total	386,162	367,164	425,529	405,823	38,659	467,722	446,601	40,778
Accumulated Amortization Reserve									
7	Beginning of the Year	5	5	7	7	2	9	9	2
8	Net Amortization Reserve	2	1	2	1	0	2	1	0
9	Total	7	6	9	8	2	11	10	2
Escalation Rates to 2016\$									
10		18.725%	14.589%	9.566%	5.234%	3.992%	1.877%	0.000%	
11	Capital Additions (Table 11)	8,986	330,195	32,906	30,444	29,986	13,181	12,622	
12	Capital Additions (2016\$)	10,668	378,366	36,054	32,038	31,183	13,429	12,622	
13	Capital Additions 7-Year Average							73,480	75,225 77,360
14	Capital Retirements (Table 12)					1,434	1,077	1,232	
15	Capital Retirements (2016\$)					1,491	1,097	1,232	
16	Capital Retirements 3-Year Average							1,273	1,303 1,340
17	Net Plant Additions for Ratebase								73,922 76,019

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SDG&E Response 4:-Continued

San Diego Gas and Electric Company
2016 GRC – Revised March 2015
Non-Shared Service Workpapers

Table 10

San Diego Gas and Electric Company
WAVG Rate Base Support: Capital Additions, Capital Retirements, Net Depreciation and Amortization Reserve
GAS DISTRIBUTION
(Thousands of Dollars)

Line No.	Description	2016 RO Model		2017-2018 Attrition Year																																																																																																								
		End of Year	WAVG	End of Year	WAVG	WAVG Increase	End of Year	WAVG	WAVG Increase																																																																																																			
Plant-in-Service																																																																																																												
1	Beginning of the Year	1,779,757	1,779,757	1,886,309	1,886,309	106,553	1,966,199	1,966,199	79,890																																																																																																			
2	Net Plant Additions	106,553	44,148	79,890	33,100	(11,047)	81,119	33,610	509																																																																																																			
3	Total	1,886,309	1,823,904	1,966,199	1,919,410	95,506	2,047,319	1,999,809	80,399																																																																																																			
Accumulated Depreciation Reserve																																																																																																												
4	Beginning of the Year	978,840	978,840	1,006,274	1,006,274	27,434	1,035,145	1,035,145	28,871																																																																																																			
5	Net Depreciation Reserve	27,434	15,483	28,871	16,294	811	30,080	16,976	683																																																																																																			
6	Total	1,006,274	994,323	1,035,145	1,022,568	28,245	1,065,226	1,052,122	29,553																																																																																																			
Accumulated Amortization Reserve																																																																																																												
7	Beginning of the Year	62,911	62,911	74,126	74,126	11,215	85,929	85,929	11,803																																																																																																			
8	Net Amortization Reserve	11,215	5,710	11,803	6,009	299	12,297	6,261	252																																																																																																			
9	Total	74,126	68,621	85,929	80,135	11,514	98,226	92,190	12,054																																																																																																			
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2"></th> <th colspan="4">Recorded</th> <th colspan="3">Forecast</th> <th colspan="2">PTY</th> </tr> <tr> <th>2010 (2010\$)</th> <th>2011 (2011\$)</th> <th>2012 (2012\$)</th> <th>2013 (2013\$)</th> <th>2014 (2014\$)</th> <th>2015 (2015\$)</th> <th>2016 (2016\$)</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>10 Escalation Rates to 2016\$</td> <td>23.376%</td> <td>12.711%</td> <td>4.434%</td> <td>4.770%</td> <td>3.348%</td> <td>1.799%</td> <td>0.000%</td> <td>2.098%</td> <td>1.538%</td> </tr> <tr> <td>11 Capital Additions (Table 11)</td> <td>87,026</td> <td>52,942</td> <td>73,434</td> <td>79,587</td> <td>111,607</td> <td>81,906</td> <td>108,358</td> <td></td> <td></td> </tr> <tr> <td>12 Capital Additions (2016\$)</td> <td>107,370</td> <td>59,671</td> <td>76,690</td> <td>83,383</td> <td>115,344</td> <td>83,379</td> <td>108,358</td> <td></td> <td></td> </tr> <tr> <td>13 Capital Additions 7-Year Average</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>90,599</td> <td>92,500</td> <td>93,924</td> </tr> <tr> <td>14 Capital Retirements (Table 12)</td> <td></td> <td></td> <td></td> <td></td> <td>13,541</td> <td>9,983</td> <td>12,896</td> <td></td> <td></td> </tr> <tr> <td>15 Capital Retirements (2016\$)</td> <td></td> <td></td> <td></td> <td></td> <td>13,994</td> <td>10,163</td> <td>12,896</td> <td></td> <td></td> </tr> <tr> <td>16 Capital Retirements 3-Year Average</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>12,351</td> <td>12,610</td> <td>12,804</td> </tr> <tr> <td>17 Net Plant Additions for Ratebase</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>79,890</td> <td>81,119</td> </tr> </tbody> </table>											Recorded				Forecast			PTY		2010 (2010\$)	2011 (2011\$)	2012 (2012\$)	2013 (2013\$)	2014 (2014\$)	2015 (2015\$)	2016 (2016\$)	2017	2018	10 Escalation Rates to 2016\$	23.376%	12.711%	4.434%	4.770%	3.348%	1.799%	0.000%	2.098%	1.538%	11 Capital Additions (Table 11)	87,026	52,942	73,434	79,587	111,607	81,906	108,358			12 Capital Additions (2016\$)	107,370	59,671	76,690	83,383	115,344	83,379	108,358			13 Capital Additions 7-Year Average							90,599	92,500	93,924	14 Capital Retirements (Table 12)					13,541	9,983	12,896			15 Capital Retirements (2016\$)					13,994	10,163	12,896			16 Capital Retirements 3-Year Average							12,351	12,610	12,804	17 Net Plant Additions for Ratebase								79,890	81,119
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SDG&E PUBLIC RESPONSE
DATE RECEIVED: MARCH 5, 2018
DATE RESPONDED: MARCH 19, 2018**

5. Please provide annual 2016-2018 capital retirements as forecasted in SDG&E’s GRC application A.14-11-003 for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 13 on page 13 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 5:

Please see table below for 2016 capital retirements as authorized in the Test Year for SDG&E’s GRC application A.14-11-003. For the Post-Test Years (2017-2018), SDG&E settled on an authorized attrition rate which did not have accompanying data for capital retirements. All dollars are in thousands.

	<u>2016 (2016\$)</u>	<u>2016 (2019\$)</u>
Electric Distribution	\$ 61,519	\$ 66,108
Electric Generation	\$ 1,239	\$ 1,339
Gas Distribution	\$ 12,970	\$ 14,286
Total	<u>\$ 75,728</u>	<u>\$ 81,734</u>

Please see tables provided in our response to question 4 for 2016-2018 capital retirements as forecasted in application A.14-11-003 for electric distribution, electric generation, and gas distribution. These tables can be found in A.14-11-003, testimony of Sandra Hrna (SDG&E-37-R-WP, tables 6, 8 and 10, respectively). The data is not available in 2019\$, as this was part of the 2016 proceeding.

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6. Please provide 2014-2015 capital additions as forecasted and authorized in in SDG&E's GRC application A.10-12-005 for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 12 on page 12 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 6:

In the 2012 GRC, A.10-12-005, SDG&E did not forecast nor receive approval for capital additions for 2014-2015. For the 2012 application, SDG&E utilized a different Post Test Year mechanism which did not forecast capital additions.

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7. Please provide annual 2014-2015 capital retirements as forecasted in SDG&E's GRC application A.10-12-005 for (a) electric distribution, (b) electric generation, and (c) gas distribution using the same categories as the forecast provided at the bottom of Table 13 on page 13 of the SDG&E-43 workpapers. Please provide these responses in nominal \$ and 2019\$.

SDG&E Response 7:

In the 2012 GRC, A.10-12-005, SDG&E did not forecast nor receive approval for capital retirements for 2014-2015. For the 2012 application, SDG&E utilized a different Post-Test Year mechanism which did not forecast capital retirements.

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8. With regard to the capital additions data provided in Table 12 of the SDG&E-43 workpapers (Recorded & Forecasted Capital Additions by Function):
- a. For each year, please identify all spending amounts included in the table that were authorized or are pending authorization outside of a GRC proceeding. Please provide a description of the capital addition and specify the decision or resolution number authorizing the expenditure.
 - b. Please provide a modified version of this table that excludes all capital spending that was authorized or is pending authorization outside of a GRC proceeding. Please identify all items removed from the table for this modified version.
 - c. Please specify whether all of a portion of the incremental residential TOU mass default-related costs requested in SDG&E-18 are included in this data. If any portion of these costs are included, please specify the total amount.

SDG&E Response 8:

- a. SDG&E included the following capital additions associated with the Mobile Home Park (MHP) Utility Upgrade Pilot Program in Table 12 of the SDG&E-43-R workpapers. These costs reflect only capital additions incurred through 2016 and are included in the 2019 GRC filing as directed by the Commission in the MHP Pilot Program Decision 14-03-021. MHP was not included in SDG&E's forecasted capital additions for 2017-2019. Dollars in the table below are in thousands.

	2016
Electric	
Distribution	\$ 4,352
Gas Distribution	\$ 4,276

- b. SDG&E objects to this request to the extent that it is vague, ambiguous, and unintelligible, assumes incorrect facts, and on grounds that the burden of the request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving these objections, SDG&E respond as follows: The information requested does not exist.
- c. Table 12 includes no capital costs related to the incremental residential TOU mass default-related costs requested in SDG&E-18.

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SCG 2019 GRC – A.17-10-007
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9. Please provide actual 2014 and 2017 capital additions using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 9:

SoCalGas submitted revised workpapers, SCG-44-WP-R in December of 2017. Data provided in the following responses are in reference to the revised workpapers. Please see table below for 2014 capital additions using the same format and categories as provided at the bottom of Table 6. The response is in nominal \$ and 2019\$, and all dollars are in thousands.

		Recorded
		2014 (2014\$)
7	Capital Additions	496,049
8	Capital Additions (2016\$)	485,419
9	Capital Additions (2019\$)	534,676
10	Capital Additions 5-Year Average	
11	Retirements	79,422
12	Retirements (2016\$)	77,720
13	Retirements (2019\$)	85,607
14	Retirements 5-Year Average	
15	Plant Additions for Ratebase	

For 2017 capital additions, we will not have the data requested in this breakout until after we have filed the 2017 FERC Form 2.

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10. Please provide actual annual 2014 and 2017 capital retirements using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 10:

Please see table below for 2014 capital retirements using the same format and categories as provided at the bottom of Table 6. The response is in nominal \$ and 2019\$, and all dollars are in thousands.

		Recorded
		2014 (2014\$)
7	Capital Additions	496,049
8	Capital Additions (2016\$)	485,419
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For 2017 capital retirements, we will not have the data requested in this breakout until after we have filed the 2017 FERC Form 2.

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11. Please provide 2016-2018 capital additions as forecasted and authorized in in SCG’s GRC application A.14-11-004 using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 Workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 11:

Please see table below for 2016 capital additions as authorized in the Test Year for SCG’s GRC application A.14-11-004. For the Post-Test Years (2017-2018), SCG settled on an authorized attrition rate which did not have accompanying data for capital additions. The response is in nominal \$ and 2019\$, and all dollars are in thousands.

		Authorized
		2016 (2016\$)
7	Capital Additions	971,323
8	Capital Additions (2016\$)	971,323
9	Capital Additions (2019\$)	1,069,887
10	Capital Additions 5-Year Average	
11	Retirements	104,344
12	Retirements (2016\$)	104,344
13	Retirements (2019\$)	114,933
14	Retirements 5-Year Average	
15	Plant Additions for Ratebase	

Please see table below for 2016 – 2018 capital additions as forecasted in application A.14-11-004. These tables can be found in A.14-11-004, revised workpapers to prepared direct testimony of Ronald M. van der Leeden in nominal \$ and 2016\$. The data is not available in 2019\$ as this was not part of the 2016 GRC proceeding.

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SCG Response 11:-Continued

Table 6

Line No.	2016 RO Model		2017-2018 Attribution Year Calc					
	2016		2017		WAVG Increase	2018		WAVG Increase
	End of Year	WAVG	End of Year	WAVG		End of Year	WAVG	
1	11,702,454	11,702,454	12,577,898	12,577,898	875,445	13,196,704	13,196,704	618,806
2	875,445	282,439	618,806	199,642	(62,798)	628,326	202,713	3,071
3	12,577,898	11,984,893	13,196,704	12,777,540	792,647	13,825,030	13,399,417	621,877

Line No.	2016		2017		WAVG Increase	2018		WAVG Increase
	End of Year	WAVG	End of Year	WAVG		End of Year	WAVG	
4	6,599,775	6,599,775	6,869,499	6,869,499	269,723	7,157,061	7,157,061	287,562
5	269,723	131,657	287,562	140,364	8,707	301,558	147,195	6,831
6	6,869,499	6,731,432	7,157,061	7,009,863	278,431	7,458,618	7,304,256	294,394

Line No.	Recorded							Forecast			PTY	
	2010 (2010\$)	2011 (2011\$)	2012 (2012\$)	2013 (2013\$)	2014 (2014\$)	2015 (2015\$)	2016 (2016\$)	2017	2018	Escalation Rate		
7	475,093	609,293	624,158	582,784	664,014	749,876	981,697	2.10%	1.54%			
8	559,466	655,475	622,159	582,784	655,003	728,612	937,003					
9	586,152	686,740	651,835	610,582	686,246	763,366	981,697					
10	Capital Additions 7-Year Average							709,517	724,405	735,550		
11	Retirements					97,092	101,860	106,252				
12	Retirements (2013\$)					95,774	98,972	101,415				
13	Retirements (2016\$)					100,342	103,693	106,252				
14	Retirements 3-Year Average							105,599	107,224			
15	Plant Additions for Ratebase							618,806	628,326			

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12. Please provide annual 2016-2018 capital retirements as forecasted in SCG’s GRC application A.14-11-004 using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 12:

Please see table below for 2016 capital retirements as authorized in the Test Year for SCG’s GRC application A.14-11-004. For the Post-Test Years (2017-2018), SCG settled on an authorized attrition rate which did not have accompanying data for capital retirements. The response is in nominal \$ and 2019\$, and all dollars are in thousands.

		Authorized
		2016 (2016\$)
7	Capital Additions	971,323
8	Capital Additions (2016\$)	971,323
9	Capital Additions (2019\$)	1,069,887
10	Capital Additions 5-Year Average	
11	Retirements	104,344
12	Retirements (2016\$)	104,344
13	Retirements (2019\$)	114,933
14	Retirements 5-Year Average	
15	Plant Additions for Ratebase	

Please see table below for 2016 – 2018 capital retirements as forecasted in application A.14-11-004. These tables can be found in A.14-11-004, revised workpapers to prepared direct testimony of Ronald M. van der Leeden in nominal \$ and 2016\$. The data is not available in 2019\$ as this was not part of the 2016 GRC proceeding.

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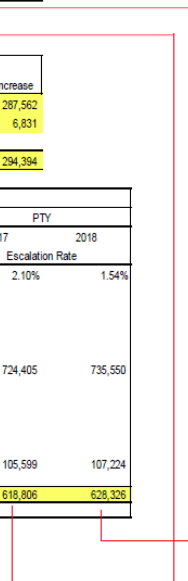
Table 6

Southern California Gas Company
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Line No.	2016 RO Model		2017-2018 Attribution Year Calc					
	End of Year	WAVG	End of Year	WAVG	WAVG Increase	End of Year	WAVG	WAVG Increase
1	11,702,454	11,702,454	12,577,898	12,577,898	875,445	13,196,704	13,196,704	618,806
2	875,445	282,439	618,806	199,642	(62,798)	628,326	202,713	3,071
3	12,577,898	11,984,893	13,196,704	12,777,540	792,647	13,825,030	13,399,417	621,877

Line No.	2016		2017			2018		
	End of Year	WAVG	End of Year	WAVG	WAVG Increase	End of Year	WAVG	WAVG Increase
4	6,599,775	6,599,775	6,869,499	6,869,499	269,723	7,157,061	7,157,061	287,562
5	269,723	131,657	287,562	140,364	8,707	301,558	147,195	6,831
6	6,869,499	6,731,432	7,157,061	7,009,863	278,431	7,458,618	7,304,256	294,394

Line No.	Recorded						Forecast			PTY	
	2010 (2010\$)	2011 (2011\$)	2012 (2012\$)	2013 (2013\$)	2014 (2014\$)	2015 (2015\$)	2016 (2016\$)	2017	2018	Escalation Rate	
7	475,093	609,293	624,158	582,784	664,014	749,876	981,697	2.10%	1.54%		
8	559,466	655,475	622,159	582,784	655,003	728,612	937,003				
9	586,152	686,740	651,835	610,582	686,246	763,366	981,697				
10							709,517	724,405	735,550		
11					97,092	101,860	106,252				
12					95,774	98,972	101,415				
13					100,342	103,693	106,252				
14							103,429	105,599	107,224		
15								618,806	628,326		



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13. Please provide 2014-2015 capital additions as forecasted and authorized in in SCG's GRC application A.10-12-006 using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 Workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 13:

In the 2012 GRC, A.10-12-006, SoCalGas did not forecast nor receive approval for capital additions for 2014-2015. For the 2012 GRC application, SCG utilized a different Post Test Year mechanism which did not forecast capital additions.

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14. Please provide annual 2014-2015 capital retirements as forecasted in SCG's GRC application A.10-12-006 using the same format and categories as provided at the bottom of Table 6 on page 7 of the SCG-44 workpapers. Please provide these responses in nominal \$ and 2019\$.

SCG Response 14:

In the 2012 GRC, A.10-12-006, SoCalGas did not forecast nor receive approval for capital retirements for 2014-2015. For the 2012 GRC application, SCG utilized a different Post Test Year mechanism which did not forecast capital retirements.

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15. With regard to the capital additions data provided in Table 6 of the SCG-44 workpapers (Recorded & Forecasted Capital Additions):

- a. For each year, please identify all spending amounts included in the table that were authorized or are pending authorization outside of a GRC proceeding. Please provide a description of the capital addition and specify the decision or resolution number authorizing the expenditure.
- b. Please provide a modified version of this table that excludes all capital spending that was authorized or is pending authorization outside of a GRC proceeding. Please identify all items removed from the table for this modified version.

SCG Response 15:

- a. SoCalGas included the following capital additions in Table 6 of the SCG-44-R workpapers.

<i>(Thousands of \$)</i>	Recorded		Forecast			Decision Number
	2015 (2015\$)	2016 (2016\$)	2017 (2017\$)	2018 (2018\$)	2019 (2019\$)	
Aliso Canyon Turbine Replacement	\$3,821	\$14,913	\$233,146	\$0	\$0	D. 13-11-023
Advanced Metering Infrastructure	\$0	\$0	\$27,467	\$11,737	\$487	D. 10-04-027
Mobilehome Park Utility Upgrade Program	\$1,629	\$14,971	\$0	\$0	\$0	D. 14-03-021

- b. SoCalGas objects to this request to the extent that it is vague, ambiguous, and unintelligible, assumes incorrect facts, and on grounds that the burden of the request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving these objections, SoCalGas respond as follows: The information requested does not exist.

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16. On pages JDS-33 through JDS-34 of SDG&E-18, SDG&E requests “to modify Electric and Gas Rule 9, Rendering and Payment of Bills, to authorize SG&E to default all SDG&E customers to receive electronic bills as their regular bill starting Jan 1, 2021.” The following questions address this request.

- a. Has SDG&E sought any customer input on preference for default method of receiving their regular bill? If so, please share the process through which SDG&E sought such input and the results;/outcome of said process.
- b. Has SDG&E established a communication strategy for informing customers of the proposed change to default electronic billing to be implemented if the Commission approves this request? If so, please provide details about the strategy.
- c. If SDG&E has not yet developed a communication strategy for informing customers of the proposed change to default electronic billing, when does it plan to establish such a strategy.
- d. Under SDG&E’s proposal, would the Commission have the opportunity to review SDG&E’s communication strategy for informing customers of the proposed change to default electronic billing before approving this request?
- e. Please provide the following:
 - i. Total number of customer accounts for each year for the last 6 years (2012-2017)
 - ii. Number of customer accounts using paperless billing for each year for the last 6 years (2012-2017)
 - iii. Number of customer accounts using paper billing for each year for the last 6 years (2012-2017)
 - iv. Number of customer accounts that received both a paperless and a paper bill (where this option is available) during each year for the last 6 years (2012-2017)
 - v. Number of customer accounts that switched from paperless billing to paper billing during each year for the last 6 years (2012-2017)
 - vi. Please provide responses for parts (i)-(v) broken down by residential and non-residential customer accounts.

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Question 16- Continued

- f. With regard to SDG&E’s statement on page JDS-34 that “Any savings associated with adoption of paperless billing would be made to SDG&E’s authorized revenue requirement in a future GRC,” please:
 - i. State whether SDG&E has estimated the potential savings associated with this action; and
 - ii. If the answer to question 1(f)(ii) is anything other than an unequivocal “no,” please provide SDG&E’s estimated potential savings and any supporting documentation or workpapers.
- g. Please respond to the following questions regarding SDG&E’s existing bill delivery policies and procedures.
 - i. What steps does SDG&E currently take to notify customers of their options for bill delivery (e.g. electronic or paper delivery)?
 - ii. Does SDG&E currently take any actions to recommend or otherwise promote paperless bill delivery to customers?
 - iii. If SDG&E’s response to question 1(g)(ii) is anything other than an unequivocal “no,” please describe and provide examples of these actions. If these actions include written communications, please provide samples.
 - iv. How often does SDG&E recommend/notify/remind customers of their bill delivery options?
 - v. What percentage of residential and non-residential customers that are now on paperless bill delivery chose to do so in response to communication from SDG&E?

SDG&E Response 16:

- a. No, we have not conducted a survey tailored to this specific project. However, SDG&E obtains information on customer preferences on topics such as paperless billing in order to make an informed decision on customer facing offerings.
- b. No, the requested change is anticipated to commence in 2021, and a communication strategy specific to default paperless billing has not yet been developed.
- c. With default paperless billing anticipated for 2021, a communication strategy will be developed in accordance with conditional approval in this rate case.

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SDG&E Response 16 Continued:

- d. Yes, a review of the proposed strategy would be built into the timeline in accordance with conditional approval in this rate case.
- e. SDG&E forecasts postage and savings based on the number of bills (paper and paperless) and notices in relation to active electric meters. This is due to a constant fluctuation in number of customer accounts, while active electric meters typically see less fluctuation, and therefore provides a more consistent method of calculation. The following answers will be provided using active electric meters, not customer accounts.

Details are included in workpaper SDGE-18-WP pages 55 – 64 of 105.

- i. Total number of active electric meters for each year for the last 6 years (2012-2017)

	2012	2013	2014	2015	2016	2017
Total active electric meters	1,397,678	1,405,218	1,412,939	1,421,829	1,430,175	1,438,964

- ii. Number of paperless bills to active electric meters in each year for the last 6 years (2012-2017).

	2012	2013	2014	2015	2016	2017
My Account Supressed Bills	4,448,597	4,955,778	5,380,205	5,870,166	6,410,828	6,865,675
Consolidator e-Bills Delivered	771,581	872,905	931,842	908,366	918,765	964,987
Combined Electronic Bills	5,220,178	5,828,683	6,312,047	6,778,532	7,329,593	7,830,662

- iii. Number of paper bills to active electric meters in each year for the last 6 years (2012-2017).

	2012	2013	2014	2015	2016	2017
RICOH - Grouped Bills	842,264	839,427	955,359	885,060	562,066	382,033
MPK- Paper Bills	10,643,744	10,079,842	9,687,681	9,427,349	9,141,050	9,191,104
Total Paper Bills	11,486,008	10,919,269	10,643,040	10,312,409	9,703,116	9,573,137

- iv. This data is not tracked.
 - v. This data is not tracked.
 - vi. This data is not tracked.
- f.
- i. No.
 - ii. N/A.

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SDG&E Response 16 Continued:

- g. See below
 - i. When customers speak to an Energy Services Specialist (ESS) in the Customer Call Center (CCC), they are made aware of their bill delivery options. If a customer accesses Customer Service through SDG&E's online self-service portal, there is messaging about the paperless billing delivery option on our website.
 - ii. Yes, in addition to information promoting paperless billing that resides on SDG&E's website, customers who receive paper bills occasionally receive additional information about the paperless billing option. SDG&E also leverages social media and promotional emails to encourage paperless billing.
 - iii. Please see attachments UCAN-SDG&E-DR-03 Attachment Q16g_iii_1, UCAN-SDG&E-DR-03 Attachment Q16g_iii_2, UCAN-SDG&E-DR-03 Attachment Q16g_iii_3, and UCAN-SDG&E-DR-03 Attachment Q16g_iii_4.
 - iv. See response to Question 16gii. In addition, every month paperless messaging can be found on the remittance envelope sent to customers who receive paper bills every month paper bills are mailed.
 - v. The information requested is not tracked.

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17. The following questions are regarding SDG&E’s request for authorization of funds for a “Bill Redesign Phase 2” project (Page JDS-67 of SDG&E-18).
- h. Please describe and provide details such as costs and timelines for all activities and results that comprise the “Bill Redesign Phase 1” project.
 - i. Please describe and provide details such as costs and timelines for all activities and results SDG&E expects to conduct under the “Bill Redesign Phase 2” project.
 - j. Please provide the dates and scopes of all focus groups, surveys, or other customer engagement efforts conducted pursuant to the “Bill Redesign Phase 2” project, specifying any specific customer segments that were targeted in each effort.
 - k. Please provide the results for the activities described in question 2(c), including any memoranda, presentation, data, or other documents used in or reflecting the results of these customer engagement efforts.
 - l. Please describe any future efforts that SDG&E plans to obtain customer input into the “Bill Redesign Phase 2” project, specifically identifying the number and scope of different types of engagement efforts and whether they are targeted at specific customer segments. Please provide any supporting documents related to these efforts.

SDG&E Response 17:

- h. The Bill Redesign Phase 1 project included enhancements to the existing Bill Ready Notification capability. The functional enhancements as part of the project included: Bill Summary, Cost Breakdown, Highest Usage Point, Tier Chart, Energy Use Chart, Messaging (Tailored and using Next Best Option framework,) ADA compliance standards, email reporting, Call Center Representative access to customer specific email information, NEM template language updates and commercial customer links to the C3 application. There were two releases as part of this project. Release 1 began in May 2015, with a go-live date of December 2015. Release 2 began in January 2016, with a go-live date of July 2016. The total cost for the Bill Redesign Phase 1 project was approximately \$1,800,000.

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SDG&E Response 17 Continued:

- i. The Bill Redesign Phase 2 project objective is to improve the customer experience by enhancing key aspects of the bill. Specifically, utilizing color to make it easier to read and improve customer engagement in support of Rate Reform and time-of-use rate changes. Refreshing the customer bill included enhancements: enhancing the 13-month usage charts and converting it for TOU customers, improving the display for usage comparison information, updating the tier chart, adding a Daily Average Hourly Electricity chart, adding in a customer's Highest Usage Point, enhancing the Breakdown of Electric Fees section and streamlining the Payment Options section. The project began in September 2016, with a planned final go-live date in June 2018. Total project costs through January 2018 were approximately \$1.5M.
- j. Four different in-person focus groups were conducted on September 15th and 16th, 2014, in San Diego. Two groups were with residential customers, and two with business customers (one group of small business customers and one group of midsize business customers). A third-party vendor moderated the groups and conducted the analysis. Participants shared their opinions on three new bill designs, ranging in detail from one to three pages, as well as the current bill design. The order in which the designs were presented was randomized among the different groups. The objective of the research was to identify the most optimal design, one in which most customers would agree is simplified, more visually appealing, easy to understand and user friendly. An additional Net Energy Metering (NEM) presentation and feedback session was held on May 15, 2017, in San Diego. This meeting was attended by members from California Solar Energy Industries Association (CALSEIA) and representatives from private solar businesses. SDG&E shared and sought feedback on current and future NEM sample bills.
- k. Please see UCAN-SDG&E-DR-03 Attachment Q17k_1 Redacted.pdf for the results from the four, in-person, focus groups that were conducted and UCAN-SDG&E-DR-03 Attachment Q17k_2 Redacted.pdf for the NEM presentation that was provided to the NEM participants.
- l. The Bill Redesign Phase 2 project is currently in the system testing phase. There are no additional customer engagement efforts planned to gain additional customer input prior to the roll-out of the re-designed bills. The outreach efforts discussed in response to Questions 17j and k provided SDG&E with sufficient customer feedback and preferences to proceed with the Bill Redesign Phase 2 project.

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18. The following questions are regarding SDG&E's request for authorization to close two Branch Offices (Pages JDS-35 – JDS-49 of SDG&E-18).
- m. Please describe SDG&E's efforts to find a replacement Branch Office both before and after the involuntary closure of the Oceanside Branch Office.
 - n. Please also provide a list of locations considered for a new Branch Office and the reasons for rejection for each location considered.
 - o. Please describe any efforts SDG&E made to obtain input from customers affected by the closure of the Oceanside Branch Office, BEFORE the closure, regarding their preferred method for conducting transactions with SDG&E. Please provide the results of such efforts.
 - p. Please describe any efforts SDG&E made to obtain feedback from customers affected by the closure of the Oceanside Branch Office after the closure of the office, regarding the impact the closure had on them. Please provide the results of such efforts, including the results of any surveys conducted.
 - q. Please provide any unsolicited feedback SDG&E may have received from customers because of the involuntary closure of the Oceanside Branch Office, such as customer complaints and/or concerns that are tracked in SDG&E's Comment Tracking System as referenced on page JDS-48 of SDG&E-18.
 - r. Please provide the number of customers who previously used the Oceanside Branch Office and are now utilizing each of the remaining Branch Offices.
 - s. Please provide the locations and facilities available at each location, for all SDG&E Branch Offices (including the closed Oceanside Branch Office) and APLs in excel format.
 - t. Please provide the supporting data for Figure JS-4, Figure JS-5, Figure JS-6 in Excel format.
 - u. Please provide versions of Figure JS-4, Figure JS-5, and Figure JS-6 showing non-payment transactions rather than bill payments. Please also provide the supporting data in Excel format.
 - v. Please provide the total number of non-payment transactions and total number of transactions for each branch office in the years 2012-2016 in a format comparable to Table JS-22.
 - w. Please provide the data supporting Figure JS-7 broken down by payment transaction and non-payment transaction in Excel format.
 - x. Please provide the data behind Figure JS-8, and Figure JS-9 for all years from 2009-2017 in Excel format.

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Question 18 - Continued

- y. Please provide a break down (similar to the data in Figure JS-8 and JS-9) of options utilized by customers to conducts non-payment transactions. Please provide this for each year, for all years from 2009-2017.
- z. Page JDS-47 of the testimony SDG&E-18 states that “The percentage of cash payments reported by the Downtown Branch Office in 2016 was 27%.” Please identify the form in which the remaining 73% of transactions at the Downtown Branch Office were made.
- aa. Page JDS-48 of the testimony SDG&E-18 states that “The percentage of cash payments reported by the Oceanside Branch Office in BY 2016 was 73%.” Please identify the form in which the remaining 27% of transactions at the Oceanside Branch Office were made

SDG&E Response 18:

- m. Upon notification by The UPS Store of their intent to terminate the service and lease agreements, SDG&E acquired a list of neighboring businesses, within five miles, for scouting purposes to determine potential suitable replacement locations. Credit unions, chain grocers, miscellaneous retailers and corporate banks were targeted through cold calls and personal visits before and after the closure.
- n. The table below is a list of locations that SDG&E has approached for a new SDG&E branch office partnership. Unfortunately, none of these businesses elected to open a satellite branch office within their existing footprint.

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SDG&E Response 18 Continued:

Business Name	Address	City
American Stores Company LLC	5901 Priestly Drive 160	Carlsbad
Cabrillo Credit Union	1265 Carlsbad Village Drive 210	Carlsbad
City National Bank	2011 Palomar Airport Rd 100	Carlsbad
Community Commerce Bank	3142 Vista Way 101	Oceanside
Compass Bank (Corp)	815 Mission Ave	Oceanside
First National Bank	2365 Marron Rd	Carlsbad
Kinecta Fedral Credit Union	2454 Vista Way	Oceanside
Silvergate Bank	5810 El Camino Real D	Carlsbad
Wescom Credit Union	2224 El Camino Real	Oceanside
American Stores Company LLC	1601 Melrose Drive	Vista
Comerica Bank	2626 El Camino Real C	Carlsbad
Comerica Bank	1000 Aviara Pkwy 104	Carlsbad
Mission Federal Credit Union	2454 Vista Rd	Oceanside
Mission Federal Credit Union	125 Old Grove Dr	Carlsbad
Time Warner Cable Bill Payment Center	5720 El Camino Real	Carlsbad
Comerica Bank	2626 El Camino Real, C	Carlsbad
Banner Bank	5901 Priestly Drive 160	Carlsbad
Cal Coast CU (CCCU)	3485 Marron Rd	Oceanside
Vons (Albertsons)	2560 El Camino Real	Carlsbad
Stater Bros	2170 2170 Vista Way	Oceanside
Just Knock/Real Estate Connection Service Center	1850 Marron Rd 104	Carlsbad

- o. SDG&E refers UCAN to Ex. SDG&E 18 at pages JDS-40-42 and JDS – 48. Active customers who had used the services provided at the Oceanside Branch 12 months prior to closure, were notified in advance of the closure via direct mail. The letter, printed in English and Spanish, provided the exact date of closure, offered six alternative in-person payment locations in Oceanside, provided information regarding other ways to pay by phone and online, and invited customers to contact SDG&E for questions or concerns.
- p. SDG&E did not contact customers who had used the Oceanside Branch Office after the involuntary closure of that location to seek feedback regarding any impact the closure had on them.

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SDG&E Response 18 Continued:

- q. SDG&E has not received any feedback from our customers regarding the involuntary closure of the Oceanside Branch Office.
- r. 59 customers who previously used the Oceanside Branch Office have utilized the remaining branch offices during the most recent 30-day period (February 1, 2018 through March 2, 2018).
- s. Please see attachment UCAN-SDG&E-DR-03 Attachment Q18s.
- t. Please see attachment UCAN-SDG&E-DR-03 Attachment Q18t and UCAN-SDG&E-DR-03 Attachment Q18t_2.
- u. Non-payment transaction data is tracked collectively by the orders processed by all branch office employees, not by specific branch office.
- v. As discussed in response to Question 18u, the total number of non-payment transactions is not available by branch office location.

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SDG&E Response 18 Continued:

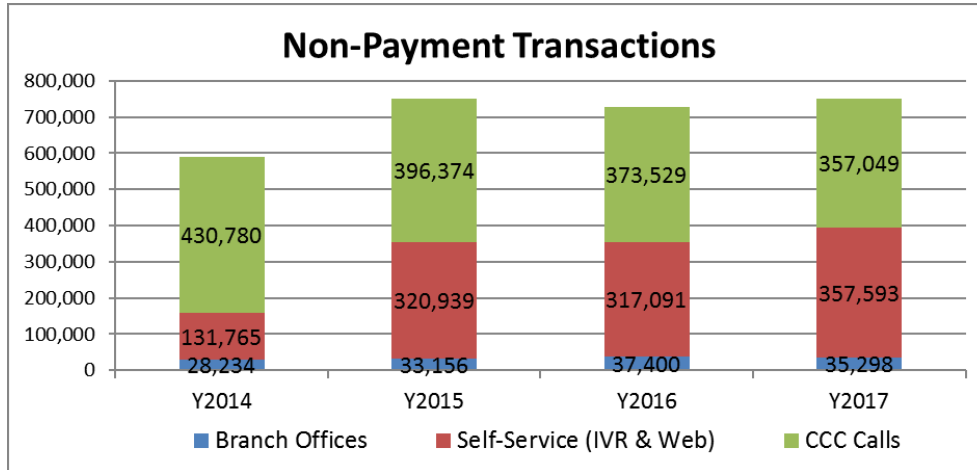
Please see the table below for the total number of payment and non-payment transactions and the grand total number of transactions for each year requested. * The Oceanside branch Office transaction volume only reflects Paystation payments. Paystation payments are not included in any other branch office location. This results in a different total payment transaction volume than what is reflected in table JS-23 in testimony.

Branch Office Transaction Volume					
Branch Office Volume of Payments	2012	2013	2014	2015	2016
Chula Vista	184,399	200,201	150,008	158,194	118,859
Downtown	32,907	33,785	28,105	25,988	25,764
El Cajon	146,757	159,404	135,655	146,054	128,167
Escondido	123,035	143,831	111,526	128,929	102,439
Market Creek	140,366	167,738	121,170	141,697	104,279
National City	100,209	109,302	92,284	98,344	90,815
Oceanside*	16,664	14,722	10,903	9,980	8,946
Total payment transactions	744,337	828,983	649,651	709,186	579,269
Total non-payment transactions (all offices combined)	30,612	29,668	28,234	33,156	37,400
Total transactions (payment plus non-payment)	774,949	858,651	677,885	742,342	616,669

- w. Please see UCAN-SDG&E-DR-03 Attachment 18w. Cost per transactions in Figure JS-7 only considers payments. As described in response to Questions 18u and 18v, non-payment transaction activity cannot be tracked by originating branch office.
- x. Please see UCAN-SDG&E-DR-03 Attachment 18x.
- y. Data for options utilized by customers to conduct non-payment transactions is only available from 2014-2017.

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SDG&E Response 18 Continued:



Non-Payment Transactions				
	2014	2015	2016	2017
<u>Branch Offices</u>				
SERVICE ORDERS	20,627	24,112	25,790	25,162
Cust. Program Enrollments	7,607	9,044	11,610	10,136
Total	28,234	33,156	37,400	35,298
<u>Self-Service (IVR & Web)</u>				
SERVICE ORDERS	122,549	248,017	240,782	276,526
Cust. Program Enrollments	9,216	72,922	76,309	81,067
Total	131,765	320,939	317,091	357,593
<u>Customer Contact Center (Call-in)</u>				
SERVICE ORDERS	427,586	393,652	371,343	355,602
Cust. Program Enrollments	3,194	2,722	2,186	1,447
Total	430,780	396,374	373,529	357,049

- z. The branch offices only accept cash and checks, so any non-cash payment transaction would have been made by check.
- aa. See response to Question z.

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- 19.** SDG&E is proposing a new Liability Insurance Premium Balancing Account (LIPBA) that would “record the difference between 1) the authorized revenue requirement to be adopted in this TY 2019 GRC specific to liability insurance premiums charged to SDG&E as set forth in the Corporate Center – Insurance testimony of Neil Cayabyab (Exhibit SCG-29/SDG&E-27) and 2) the actual incurred and recorded expenses.” (p. NGJ-13) With regard to this proposal:
- a.** Please state whether any balances in the proposed LIPBA would be subject to Commission review prior to being implemented in customers’ rates.
 - b.** Please describe the Commission review process that the balances that SDG&E is proposing to collect in customers’ rates through the LIPBA would be subject to under SDG&E’s proposal.
 - c.** Please explain why SDG&E is proposing “to amortize the balance in the LIPBA in customers’ rates in connection with the annual regulatory account update advice letter filing” (p. NGJ-13) rather than address it in SDG&E’s GRC.
 - d.** Please describe any circumstances under which the Commission could reject implementation of SDG&E’s LIPBA balance in customers’ rates.

SDG&E Response 19:

- a.** If approved, the LIPBA balances would be reviewed by Energy Division through the Tier 2 Advice Letter (AL) process in place regarding SDG&E’s annual regulatory account update filing.
- b.** SDG&E is not able to attest to the Commission’s actual review process; however, the Tier 2 AL process as described in the Commission’s General Order (GO) 96-B allows for review by the Energy Division prior to issuing a disposition letter.
- c.** Consistent with other costs reviewed through SDG&E’s annual regulatory account update filing, SDG&E’s proposal takes into consideration the annual character of insurance premiums and proposes to match the timing of costs and collections on an annual basis rather than the GRC multiple-year cycle.
- d.** SDG&E objects to this request as overly broad, calls for speculation, and exceeding the scope of permissible discovery under Rule 10.1, of the Commission’s Rules of Practice and Procedure. UCAN can refer to GO 96-B for the Commission’s Tier 2 AL review process, including rejection of an AL.

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20. SDG&E is proposing a new Third-Party Claims Balancing Account (TPCBA) that would “record the difference between the authorized revenue requirement and actual expenses specific to transactions associated with third-party-related claims as set forth in the Accounting and Finance/Legal/Regulatory Affairs/External Affairs testimony of Sandra K. Hrna (Exhibit SDG&E-31).” (pp. NGJ-13 – NGJ-14) With regard to this proposal:

- a. Please state whether any balances in the proposed LIPBA would be subject to Commission review prior to being implemented in customers’ rates.
- b. Please describe the Commission review process that the balances that SDG&E is proposing to collect in customers’ rates through the LIPBA would be subject to under SDG&E’s proposal.
- c. Please describe any circumstances under which the Commission could reject implementation of SDG&E’s TPCBA balance in customers’ rates.

SDG&E Response 20:

SDG&E recognizes that questions a and b refer to the TPCBA, not the LIPBA.

- a. If approved, the TPCBA balances would be reviewed by Energy Division through the Tier 2 Advice Letter (AL) process in place regarding SDG&E’s annual regulatory account update filing.
- b. SDG&E is not able to attest to the Commission’s actual review process; however, the Tier 2 AL process as described in the Commission’s General Order (GO) 96-B allows for review by the Energy Division prior to issuing a final disposition letter.
- c. SDG&E objects to this request as overly broad, calls for speculation, and exceeding the scope of permissible discovery under Rule 10.1, of the Commission’s Rules of Practice and Procedure. UCAN can refer to GO 96-B for the Commission’s Tier 2 AL review process, including rejection of an AL.

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21. SCG is proposing a new Liability Insurance Premium Balancing Account (LIPBA) that would “record the difference between the authorized revenue requirement to be adopted in this TY 2019 GRC specific to liability insurance premiums charged to SoCalGas as set forth in the Corporate Center – Insurance testimony of Neil Cayabyab (Exhibit SCG-29) and the actual expenses incurred and charged to SoCalGas.” (p. RQY-19) With regard to this proposal:

- a. Please state whether any balances in the proposed LIPBA would be subject to Commission review prior to being implemented in customers’ rates.
- b. Please describe the Commission review process that the balances that SDG&E is proposing to collect in customers’ rates through the LIPBA would be subject to under SDG&E’s proposal.
- c. Please explain why SDG&E is proposing “to amortize the balance in the LIPBA in customers’ gas transportation rates in connection with the annual regulatory account update advice letter filing” (p. RQY-19) rather than address it in SDG&E’s GRC.
- d. Please describe any circumstances under which the Commission could reject implementation of SDG&E’s LIPBA balance in customers’ rates.

SoCalGas Response 21:

- a. If approved, the LIPBA balances would be reviewed by Energy Division through the Tier 2 Advice Letter (AL) process in place regarding SoCalGas’ annual regulatory account update filing.
- b. SoCalGas is not able to attest to the Commission’s actual review process; however, the Tier 2 AL process as described in the Commission’s General Order (GO) 96-B allows for review by the Energy Division prior to issuing a final disposition letter.
- c. Consistent with other costs reviewed through SoCalGas’ annual regulatory account update filing, SoCalGas’ proposal takes into consideration the annual character of insurance premiums and proposes to match the timing of costs and collections on an annual basis rather than the GRC multiple-year cycle.
- d. SoCalGas objects to this request as overly broad, calls for speculation, and exceeding the scope of permissible discovery under Rule 10.1, of the Commission’s Rules of Practice and Procedure. UCAN can refer to GO 96-B for the Commission’s Tier 2 AL review process, including rejection of an AL.

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22. SDG&E states that its proposed LIPBA is required due to the fact that “Because of inverse condemnation claims, SDG&E and SoCalGas may require more liability insurance than what is projected in the rest of this testimony.” (p. NKC-16) With regard to this statement:

- a. Please explain why SDG&E and SCG have chosen not to forecast larger liability insurance revenue requirements if SDG&E and SCG are concerned that the insurance levels they have projected in this testimony are inadequate to cover their insurance requirements.
- b. Please explain how the LIPBA would address SDG&E and SCG purchasing less liability insurance than they actually require during the period covered by this GRC.

SDG&E Response 22:

See the response to UCAN-SDG&E-DR-3.d.

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23. SDG&E states that, regarding its potential legal liability under inverse condemnation, “In 2010, the Commission recognized this problem in granting SDG&E’s Z Factor application for liability insurance premium and deductible expense increases...” (p. NKC-16) With regard to this statement:

- a. Since the Commission addressed this issue in SDG&E’s Z Factor application proceeding, please explain why SDG&E believes a further remedy is necessary via the 2019 GRC Phase 1.
- b. Please explain why SDG&E is now requesting a new two-way balancing account to address its liability insurance costs rather than alternative relief.

SDG&E Response 23:

- a. The Z-Factor application referenced in this question (A.09-08-019) specifically covered issues from the 2009 renewal period until the next GRC, which then was the Test-Year 2012 GRC. In the decision resolving A.09-08-019, the Commission recognized the problem with potential legal liability under inverse condemnation but no remedy was put in place for future treatment of insurance premiums, payouts, or inverse condemnation considerations. See D.10-12-053, Finding of Fact 8.
- b. The request for a two-way balancing account was largely due to the uncertainty around, the need for, and the price of insurance due to insurance market fluctuations.