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**Exhibit Reference:** SCG-17, SCG-26
**SCG Witness:** Rene F. Garcia, C. Olmsted
**Subject:** Advanced Metering Infrastructure (AMI)

**Please provide the following:**

**Questions 1 thru 8 pertain to Ex. SCG-17:**

1. On page RFG-7 of Ex. SCG-17, SoCal Gas states Advice Letter 1410 was authorized to establish the AMIBA. When ORA reviewed SoCal Gas' website there was no Advice Letter 1410 that was authorized.

       a. Is the correct Advice Letter 4110?

       b. If not, please provide a copy of Advice Letter 1410.

**SoCalGas Response 1:**

a. Yes, the correct Advice Letter is 4110. This was an error in the testimony of Rene Garcia (Exhibit SCG-17) and will be addressed in the revised testimony, to be submitted at a later date.

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2.  Referring to Ex. SCG-17, p. RFG-11, please provide documentation from Santa Barbara County, Rolling Hills and Rancho Palos Verdes regarding the permitting processes for advanced meter infrastructure in their communities.

**SoCalGas Response 2:**

Santa Barbara County, Rolling Hills, and Rancho Palos Verdes contend that the installation of the Data Collector Units (DCUs) are subject to the "discretionary" permitting requirements found in their conditional use permits or wireless telecommunications permits.
See references to attachments for each city or county below:

**Santa Barbara County:**
- ORA-DR-031-MW5-Q2 Attachment 1: 35.44 Telecommunications Facilities
- ORA-DR-031-MW5-Q2 Attachment 2: 35.80 Permit Application Filing and Processing
- ORA-DR-031-MW5-Q2 Attachment 3: 35.82 Permit Review and Decisions

**Rolling Hills:**
- ORA-DR-031-MW5-Q2 Attachment 4: 17.27.040 - Wireless communication antennas and facilities.
- ORA-DR-031-MW5-Q2 Attachment 5: 17.42.020 - Application requirements
- ORA-DR-031-MW5-Q2 Attachment 6: 17.42.050 - Basis for approval or denial of conditional use permit.

**Rancho Palos Verdes:**
- ORA-DR-031-MW5-Q2 Attachment 7: 12.18.040 - Wireless Telecommunications Facilities in the Public Right-of-Way
- ORA-DR-031-MW5-Q2 Attachment 8: 12.18.050 - Application for wireless telecommunications facility permit
- ORA-DR-031-MW5-Q2 Attachment 9: 12.18.090 - Findings

As stated in testimony (Ex. SCG-17) in Section III.B.2.a, "A discretionary permit (such as a conditional use permit) is one that is subject to the evaluation, judgment, and approval or denial by the local planning authority. Essentially, a discretionary permit requirement gives a local agency the power to render a value judgement on whether the item being permitted should be allowed." In addition, "because discretionary permitting processes are contrary to SoCalGas' understanding of the CPUCs overarching authority over utility facilities, and because acquiescing to discretionary permitting processes could result in DCUs being rejected or removed by the jurisdiction at any time, SoCalGas has refrained from completing applications in these jurisdictions."

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3. Please provide an explanation and supporting documentation for this discrepancy:

    a. Network Maintenance and Construction on page 39 of Ex. SCG-17-WP reference number 2n, Pole Relocation Permits $14,330. SoCalGas response to data request ORA-SCG-013-MW5 Question 4, reference number 2n, Pole Relocation Permits $46,575.

**SoCalGas Response 3:**

This was an error on page 39 of Ex. SCG-17-WP and the correct cost for reference number 2n is $46,575 as shown in the calculation on page 45 of Ex. SCG-17-WP. This will be addressed in the revised workpapers which will be submitted at a later date.

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4. Please provide supporting documentation such as invoices or contracts for the following non-labor expenses found on pages 39-47 of Ex. SCG-17-WP:

    a.   DCU Warranty, a total cost of $1,075,783.

    b.   DCU Phone Bills, a total cost of $690,000.

    c. Bucket Truck Rentals, a total cost of $171,600.

        i. Provide an explanation as to why SoCal Gas rents bucket trucks instead of purchasing them?

        ii. Please provide a cost analysis for renting versus purchasing.

    d.   DCU Battery Replacements, a total cost of $588,449.

    e.   Siterra License, a total cost of $133,333.

    f.   Headend Software Maintenance Fees, a total cost of $486,000.

    g.   MDMS Software Maintenance Fees, a total cost of $171,720.

    h.   Professional Services, a total cost of $73,440.

**SoCalGas Response 4:**

    a.  DCU Warranty, a total cost of $1,075,783.

    See attachment ORA-DR-031-MW5-Q4a Attachment CONFIDENTIAL for vendor proposal for DCU warranty fee and ORA-DR-031-MW5-Q4,5, & 7 Attachment CONFIDENTIAL for explanation and detail.

    b. DCU Phone Bills, a total cost of $690,000.

    See attachments ORA-DR-031-MW5-Q4b Attachment 1 CONFIDENTIAL and ORA-DR-031-MW5-Q4b Attachment 2 CONFIDENTIAL for pricing information and ORA-DR-031-MW5-Q4,5, & 7 Attachment CONFIDENTIAL for explanation and detail.

    c. Bucket Truck Rentals, a total cost of $171,600.

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**SoCalGas Response 4:-Continued**

> SoCalGas is currently in the process of re-assessing this forecast. The cost analysis showing related figures is not currently available. However, once that is completed SoCalGas may revise the forecast and will provide supporting documentation.

> i. Provide an explanation as to why SoCal Gas rents bucket trucks instead of purchasing them?

> See response to 4.c.

> ii. Please provide a cost analysis for renting versus purchasing.

> See response to 4.c.

d.  DCU Battery Replacements, a total cost of $588,449.

See attachment ORA-DR-031-MW5-Q4d, f, & g Attachment CONFIDENTIAL (Tab 2, Line 46) for pricing matrix and ORA-DR-031-MW5-Q4,5, & 7 Attachment CONFIDENTIAL for explanation and detail.

e.  Siterra License, a total cost of $133,333.

See ORA-DR-031-MW5-Q4e Attachment 1 CONFIDENTIAL for vendor contract and ORA-DR-031-MW5-Q4e Attachment 2 CONFIDENTIAL for data storage and transfer fees. See ORA-DR-031-MW5-Q4,5, & 7 Attachment CONFIDENTIAL for explanation and detail.

f.  Headend Software Maintenance Fees, a total cost of $486,000.

See ORA-DR-031-MW5-Q4d, f, & g Attachment CONFIDENTIAL (Tab 2, Line 12) for pricing matrix. An 8% escalation rate is added to the Headend Software Maintenance cost (see answer to ORA-DR-031-MW5-Q5 for explanation of 8% escalation rate).

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**SoCalGas Response 4:-Continued**

    g.  MDMS Software Maintenance Fees, a total cost of $171,720.

        See ORA-DR-031-MW5-Q4d, f, & g Attachment CONFIDENTIAL (Tab 1, Line 17) for pricing matrix. An 8% escalation rate is added to the Headend Software Maintenance cost (see answer to ORA-DR-031-MW5-Q5 for explanation of 8% escalation rate).

    h.  Professional Services, a total cost of $73,440.

        See ORA-DR-031-MW5-Q4h Attachment CONFIDENTIAL for Professional Services Rates schedule and ORA-DR-031-MW5-Q4,5, & 7 Attachment CONFIDENTIAL for explanation and detail. An 8% escalation rate is added to the Professional Services cost (see answer to ORA-DR-031-MW5-Q5 for explanation of 8% escalation rate).

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5. Please provide an explanation as to why references 4a, 4b and 4c of Ex. SCG-17-WP on pages 46 and 47, include an 8% escalation cost.


**SoCalGas Response 5:**

See ORA-DR-031-MW5-Q4, 5, & 7 Attachment <span style="color:red">CONFIDENTIAL</span> for explanation and detail.

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6. On page RFG-4 of Ex. SCG-17 the note states the Data Collector Unit & Pole Inspections were identified after filing the RAMP report.

    a. Who identified the need for the Data Collector Unit & Pole inspections?

    b. Provide a description of tasks performed for the Data Collector Unit & Pole Inspections.

    c. Are inspections currently performed for Data Collector Units & Poles? If yes, by whom? Please provide supporting documentation.

    d. How often does SoCal Gas expect each Data Collector Unit & Pole to be inspected? Please explain.

**SoCalGas Response 6:**

    a. The need for Data Collector Unit & Pole inspections was determined during AMI deployment. However, this risk mitigation was not originally identified as part of the November 30th RAMP Report. Therefore, it is acknowledged in the AMI testimony as a post-RAMP filing item.

    b. See ORA SCG-031-MW5-Q6b Attachment.

    c. Yes, they are performed by both contractor and internal labor. See ORA SCG-031-MW5-Q6c CONFIDENTIAL Attachment for supporting documentation for contractor labor.

    d. SoCalGas plans for each Data Collector Unit & Pole to be inspected annually. This process is described further in section II.A. of testimony (Ex. SCG-17).

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7.  On page 46 of Ex. SCG-17-WP the Siterra License fees are $133,333. On page RGF-25 of Ex. SCG-17, SoCal Gas is requesting $0.469 million in 2018 and $0.235 million in 2019 to convert from Siterra to SAP. Would the Siterra License fees be removed if the conversion is approved? If not, why not?

**SoCalGas Response 7:**

See ORA-DR-031-MW5-Q4, 5, & 7 Attachment CONFIDENTIAL for explanation and detail.

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8. On page 46 of Ex. SCG-17-WP the NEMO License fees are $186,000.

    a. Please explain the purpose of NEMO.

    b. Is there any other program similar to NEMO that SoCal Gas currently uses to perform the same tasks?

    c. Is NEMO associated with Siterra? Please explain.

    d. Is NEMO associated with SAP? Please explain.

**SoCalGas Response 8:**

    a. As stated in Ex. SCG-17 in Section IV.D.3., the NEMO application's purpose is to provide the ability to monitor the AMI network status and performance by providing automated network status reporting, aggregated data and visualization tools to execute the resolution of network communication exceptions at both the DCU and MTU level.

    b. There are no other programs at SoCalGas that provide the necessary capabilities to successfully monitor and manage the AMI network. Only NEMO provides information about asset performance and has the capability to provide dashboard reporting, exception generation and management, deep-dive troubleshooting and asset comparison.

    c. Some data from Siterra is included in NEMO, such as location information, lifecycle and other static attributes.

    d. Some data from SAP is included in NEMO, such as MTU stock code, MTU vendor part number and other static attributes.

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**Question 9 pertains to Ex. SCG-26:**

9. Regarding SCG's response to data request ORA-SCG-001-MW5 Question 5 a-e, the concept documents state "Labor actuals were used to develop zero-based estimates" and "Vendor quotes and contract values were used to develop non-labor estimates." Please provide all supporting documentation regarding labor actuals and non-labor estimates including vendor quotes and contracts regarding the following:

   a. DCU LTE Upgrade Program

   b. DCU-Software Information Security (IS) Upgrade Project

   c. DCU Compliance Inspection Work Management


**SoCalGas Response 9:**

   a. See ORA-DR-031-MW5-Q9 Attachment CONFIDENTIAL (Tab Q 9.a. DCU LTE) for explanation and detail.

   b. See ORA-DR-031-MW5-Q9 Attachment CONFIDENTIAL (Tab Q 9.b. DCU IS Upgrade) for explanation and detail.

   c. See ORA-DR-031-MW5-Q9 Attachment CONFIDENTIAL (Tab Q 9.c. DCU Compliance) for explanation and detail.