

**ORA DATA REQUEST
ORA-SCG-042-MRK
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: DECEMBER 12, 2017
DATE RESPONDED: JANUARY 3, 2018**

Exhibit Reference: SCG-39
SCG Witness: Rose-Marie Payan
Subject: Gas Customer Forecast

Please provide the following:

1. Referring to SCG's file "ORA SCG 006 Attachment Q1 FILE A_FORECAST TABLE ANNUAL CONNECTED.xls" sent in response to data request ORA-SCG-006-MRK, the tab "ACTIVE TABLE ANNUAL TOT NEW 4 17" contains numbers matching the numbers in Table RMP-3, however these numbers are hard coded and not linked to a tab or other spreadsheet with their computation. Please provide a working spreadsheet backing up the forecasts in Table RMP-3, so that every number in that table can be traced as to what data inputs contributed to that number and how these data inputs were manipulated to achieve that number. Include all calculations and formulas in Excel format. If any statistical packages were used in producing the numbers in Table RMP-3 then the log and output of that package should be supplied. If any extra statistical analysis was done via spreadsheet, then those spreadsheets should also be provided.

SoCalGas Response 1:

SoCalGas objects to the instructions in Question 1 on the grounds that they are unfairly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). 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:

SoCalGas' response to ORA-SCG-006-MRK already provided the data so that every number in Table RMP-3 can be traced as to what data inputs and adjustments contributed to that number. On December 18, 2017, SoCalGas informed ORA that the information requested is not available in linked form, but offered to guide ORA through the gas customer forecast spreadsheets and how they interact with each other via video conference. ORA declined the offer as inappropriate. SoCalGas' offer is consistent with the Rate Case Plan's contemplation of informal meetings to explain workpapers (see page A-10). To the extent ORA and other parties need to rely on formal discovery, SoCalGas' previous response provides that information.

While not required to create new data or present existing data in a different form, to facilitate ORA's review in this instance, SoCalGas has created two separately attached files listed below that are working spreadsheets backing up the forecasts in Table RMP-3; Table RMP-3 contains a summary of the forecasted output. The forecasted annual totals have been linked to the tabs where the quarterly forecasted numbers reside.

- *ORA SCG 042_LINKED MRK QUESTION 1 FILE A_FORECAST TABLE ANNUAL CONNECTED.xlsx*

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SoCalGas Response 1 Continued:

- *ORA SCG 042 MRK QUESTION 1 FILE B linked QUARTER TO ANNUAL AVERAGES AND ESTIMATION REPOSITORY.xlsx*