

TURN DATA REQUEST-072
SDG&E-SOCALGAS 2019 GRC – A.17-10-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: JUNE 27, 2018
DATE RESPONDED: JULY 17, 2018
UPDATED RESPONSE Q4 & 7: DATED JULY 20, 2018

1. SCG states at p. CLH-59:12-13 of SCG-223, “Sites with current NGV infrastructure are scoped with the available space at the time of installation (p. CLH-59, lines12-13).”

- a. Please define “available space” as that term is used in the testimony.
- b. Do the parking requirements of conventional vehicles at a given site at which SCG installs an NGV refueling station impact the “available space” determination or calculation?
- c. Has SCG in the past installed more hoses than is required for the number of AFVs that are stationed at a given operating base/multi-use facility because the “available space at the time of installation” permitted such a scope? If so, please identify each such operating base/multi-use facility. Please also state and describe the three most frequent reasons for the practice. If not, why not?
- d. Has SCG in the past limited the installation of hoses to a number at or below the number of hoses necessary for the number of AFVs that are stationed at a given operating base/multi-use facility because the “available space at the time of installation” was inadequate? If so, please identify each such operating base/multi-use facility. Please also state and describe the three most frequent reasons for the practice. If not, why not?

Utility Response 1:

- a. “available space” is meant to define general constraints that vary from site to site related to parking space requirements and/or limitations at each site for employee vehicles, Fleet vehicles, and delivery vehicles, emergency vehicle access/parking, ingress/egress, federal, state, and local requirements, etc.
- b. There is no calculation associated with determining the available space for Fleet. However, parking requirements for “conventional vehicles” (which SoCalGas interprets as vehicles that use diesel or gasoline) can impact the available space when considering the installation of NGV refueling stations.
- c. Yes, in planning for future expansion of our Fleet system-wide and for the interchangeability of vehicles between current and future bases, SoCalGas has in the past installed more hoses than the number of NGVs stationed at a given operating base/multi-use facility. SoCalGas does not track the locations at which it installed more slow-fill NGV refueling hoses than NGVs at the time the NGV refueling stations are installed.

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d. Yes, SoCalGas has in the past installed fewer hoses than the number of NGVs at a given operating base/multi-use facility.

Utility Response 1:-CONTINUED

This circumstance may occur because of available space at the time of installation, the size of the operating base/multi-use facility, and the number of operating crews that can be accommodated. SoCalGas does not track the locations at which there were fewer slow-fill NGV refueling hoses than there were NGVs at the time the NGV refueling stations are installed.

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2. At p. CLH-11 of SCG-223, SCG states, “Fleet has temporarily provided vehicle rentals to meet current operational needs, and therefore reduced recent historical replacements for 2015-2017.”

- a. Please identify and explain each reason that Fleet relied upon when it decided to increase the vehicle rental counts in 2016 and 2017 in lieu of acquiring vehicles through vehicle lease.
- b. For each year from 2009 through 2017, please provide the annual recorded costs for vehicle rentals.
- c. For each year from 2014 through 2017, please break the rental figures from Table CLH-8 into the following categories by rental duration: one week or less; one week to one month; one month to three months; and over three months.
- d. Please identify (by page and line number, where available) each place in SCG’s direct testimony, workpapers, and data request responses where the utility identified or discussed its use of vehicle rentals to meet current operational needs during 2015-2017.
- e. Please provide all documentation from 2014-2017 regarding SCG’s decision to rely on rentals rather than replacements during that period, including but not limited to any memos, analyses or reports considered before the decision was made, and any memos or reports relied upon by SCG management to approve the decision.

Utility Response 2:

- a. Fleet does not make the decision to increase vehicle rental counts as the rental costs are incurred by the operating units. Fleet’s approach on whether to replace rental vehicles in 2016 and 2017 depended on the specific situation including rental vehicle duration and project end date for which the vehicle may have been rented. In addition, the timing of rental replacements depends on remaining or available funds during the year when allocated funds for Fleet may have been depleted (or projected to be depleted) by spend for other Fleet needs.

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Utility Response 2:-CONTINUED

b.

SoCalGas Rental Expenses 2009 – 2017 Nomial dollars (\$000)									
	2009	2010	2011	2012	2013	2014	2015	2016	2017
Rental Vehicles	\$ 2	\$ 45	\$ 55	\$70	\$159	\$132	\$355	\$1,074	\$1,679

c. SoCalGas objects to this request on the grounds that that the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving this objection, SoCalGas responds as follows: SoCalGas’ invoicing system is not able to break down invoices by rental figures into rental duration. SoCalGas must review individual invoices to obtain this information.

d. SoCalGas objects to this request on the grounds that that the request is unduly burdensome, and the information requested is equally available to requesting party. Subject to and without waiving this objection, SoCalGas responds as follows: As of the date of this data request response, SoCalGas has identified the following 3 documents that relate to the use of vehicle rentals to meet current operational needs: (1) in the workpapers for SCG-04-CWP, pages 232 & 239 relating to a limited-time capital project; (2) in ORA-SCG-087, Question 1 relating to Advanced Metering Infrastructure; and, (3) in this data request, TURN_DR-072, and response. SoCalGas will update this response if additional documents are identified.

e. SoCalGas is not aware of any documentation from 2014-2017 relating to a decision to rely on rental vehicles.

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3. Please provide the vehicle-rental counts for each year, 2009-2013 on the same basis as the annual rental counts that SCG set forth in Table CLH-8 on p. CLH-11 of SCG-223.

Utility Response 3:

2009 = 8

2010 = 24

2011 = 31

2012 = 26

2013 = 22

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4. Please provide the recorded data corresponding to 2009-2017 for each field represented in Table CLH-16 on p. CLH-16 of SCG-223.

Updated Utility Response 4:

SoCalGas provided this dataset in ORA-SCG-145-LMW-Q1. For ease of reference, SoCalGas reorganized the data so that it follows Table CLH-16 on page CLH-16 of SCG 223.

SoCalGas ACQUIRED UNITS BY TYPE AND YEAR									
Replacements	2009	2010	2011	2012	2013	2014	2015	2016	2017
New Fleet Units for Replacement	316	112	598	201	253	207	23	359	82
Alternative Fuel Vehicles (AFV)	4	66	89	59	180	164	17	215	98
Total Replacement Units	320	178	687	260	433	371	40	574	180
<u>Vehicles at Year End¹</u>			<u>5135</u>	<u>5239</u>	<u>5213</u>	<u>5004</u>	<u>5004</u>	<u>5270</u>	<u>5224</u>
<u>Replacement %²</u>			<u>13%</u>	<u>5%</u>	<u>8%</u>	<u>7%</u>	<u>1%</u>	<u>11%</u>	<u>3%</u>

As a courtesy, SoCalGas includes the “Vehicles at Year End” and “Replacement %” in this update.

As explained in ORA-SDGE-147-Q9c, the Fleet management database is dynamic and evergreen. For example, as vehicles are placed into service or vehicles retire, the data is updated to reflect the most accurate information available, and as such the data does not remain static as data is updated and changes over time. In response to this data request, SoCalGas is relying on the snapshot of data provided in TURN DR 26, Question 2a, which only contains data from 2011-2017. Accordingly, SoCalGas is unable to provide the annual replacement percentage for 2009 and 2010 since the replacement percentage would not be based on the same data set provided in TURN DR 26, Question 2a.

¹ Source: Response to TURN_DR-026-Q2

² “Replacement %” = “Total Replacement Units” divided by “Vehicles at Year End”

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5. At p. CLH-12 of SDG&E-221, SDG&E states, “Fleet has temporarily provided vehicle rentals to meet current operational needs, and therefore reduced recent historical replacements for 2015-2017.”

- a. Please identify and explain each reason that Fleet relied upon when it decided to increase the vehicle rental counts in 2016 and 2017 in lieu of acquiring vehicles through vehicle lease.
- b. For each year from 2009 through 2017, please provide the annual recorded costs for vehicle rentals.
- c. For each year from 2014 through 2017, please break the rental figures from Table CLH-8 into the following categories by rental duration: one week or less; one week to one month; one month to three months; and over three months.
- d. Please identify (by page and line number, where available) each place in SDG&E’s direct testimony, workpapers, and data request responses where the utility identified or discussed its use of vehicle rentals to meet current operational needs during 2015-2017.
- e. Please provide all documentation from 2014-2017 regarding SDG&E’s decision to rely on rentals rather than replacements during that period, including but not limited to any memos, analyses or reports considered before the decision was made, and any memos or reports relied upon by SDG&E management to approve the decision.

Utility Response 5:

a. Fleet does not make the decision to increase vehicle rental counts as the rental costs are incurred by the operating units. Fleet’s approach on whether to replace rental vehicles in 2016 and 2017 depended on the specific situation including rental vehicle duration and project end date for which the vehicle may have been rented. In addition, the timing of rental replacements depends on remaining or available funds during the year when allocated funds for Fleet may have been depleted (or projected to be depleted) by spend for other Fleet needs.

b.

SDG&E Rental Expenses 2009 – 2017 Nomial dollars (\$000)									
	2009	2010	2011	2012	2013	2014	2015	2016	2017
Rental	\$ 247	\$217	\$ 247	\$ 296	\$ 349	\$ 105	\$ 147	\$ 273	\$ 331

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Vehicles									
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Utility Response 5:-CONTINUED

c. SDG&E objects to this request on the grounds that that the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows: SDG&E's invoicing system is not able to break down invoices by rental figures into rental duration. SDG&E must review individual invoices to obtain this information.

d. SDG&E objects to this request on the grounds that that the request is unduly burdensome and the information requested is equally available to requesting party. Subject to and without waiving these objections, SDG&E responds as follows: As of the date of this data request response, SDG&E has identified the following 3 documents that relate to the use of vehicle rentals to meet current operational needs: (1) in Zeller -SDG&E-DR-005, Q4; (2) in ORA-SDGE-073, Q1; and, (3) in this data request, TURN_DR-072, and response. SDG&E will update this response if additional documents are identified.

e. SDG&E is not aware of any documentation from 2014-2017 relating to a decision to rely on rental vehicles.

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6. Please provide the vehicle-rental counts for each year, 2009-2013 on the same basis as the annual rental counts that SDG&E set forth in Table CLH-8 on p. CLH-13 of SDG&E-221.

Utility Response 6:

2009 = 50

2010 = 44

2011 = 81

2012 = 69

2013 = 87

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7. Please provide the recorded data corresponding to 2009-2017 for each field represented in Table CLH-16 on p. CLH-18 of SDG&E-221.

Updated Utility Response 7:

SDG&E provided this dataset in ORA-SDGE-147-LMW-Q1. For ease of reference, SDG&E reorganized the data so that it follows Table CLH-16 on page CLH-16 of SCG 223.

SDG&E ACQUIRED UNITS BY TYPE AND YEAR									
Replacements	2009	2010	2011	2012	2013	2014	2015	2016	2017
New Fleet Units for Replacement	130	41	171	133	226	104	24	57	89
Alternative Fuel Vehicles (AFV)	6	1	9	11	14	7	1	22	34
Total Replacement Units	136	42	180	144	240	111	25	79	123
Vehicles at Year End ³	-	-	2106	2102	2254	2067	2052	2106	2149
Replacement % ⁴	-	-	9%	7%	11%	5%	1%	4%	6%

As a courtesy, SDG&E includes the “Vehicles at Year End” and “Replacement %” in this update.

As explained in ORA-SDGE-147-Q9c, the Fleet management database is dynamic and evergreen. For example, as vehicles are placed into service or vehicles retire, the data is updated to reflect the most accurate information available, and as such the data does not remain static as data is updated and changes over time. In response to this data request, SDG&E is relying on the snapshot of data provided in TURN DR 26, Question 2a, which only contains data from 2011-2017. Accordingly, SDG&E is unable to provide the annual replacement percentage for 2009 and 2010 since the replacement percentage would not be based on the same data set provided in TURN DR 26, Question 2a.

³ Source: Response to TURN_DR-026-Q2

⁴ “Replacement %” = “Total Replacement Units” divided by “Vehicles at Year End”