**A.10-12-005/A.10-12-006 Sempra Utilities 2012 TY GRCs**

**TURN Data Request to SoCalGas**

**Data Request Number:** TURN-SCG-44 (NTP&S)

**Date Sent:** November 9, 2011

**Date Due:** November 23, 2011

Please provide the name of the witness/responder.

For any questions requesting numerical recorded data, please provide all responses in working excel spreadsheet format if so available.

For any question requesting documents, please interpret the term broadly to include any and all hard copy or electronic documents or records in SoCalGas’ possession.

1. At Ex. SCG-233, p. RCL-14, ll. 22, the Sempra Utilities state that the sharing mechanism proposed for Type 2 NTP&S “is a reasonable allocation of the benefits relative to the risks.”
   1. Please identify and briefly describe each risk to ratepayers that the Sempra Utilities considered in determining the reasonableness of this allocation.
   2. Please identify and briefly describe each benefit to ratepayers that the Sempra Utilities considered in determining the reasonableness of this allocation.
   3. Please identify and briefly describe each risk to shareholders that the Sempra Utilities considered in determining the reasonableness of this allocation.
   4. Please identify and briefly describe each benefit to shareholders that the Sempra Utilities considered in determining the reasonableness of this allocation.
2. At Ex. SCG-233, p. 10, ll. 14-16, the Sempra Utilities state that an examination of the 2009 NTP&S report for SoCalGas demonstrates that 87% of the utility’s existing NTP&S for which the proposed sharing mechanism would apply would be considered “active” under the framework laid out in D.99-09-070. The testimony than cites the SDG&E 2009 NTP&S report.
   1. Which utility’s 2009 NTP&S report did the Sempra Utilities intend to refer to?
   2. Did the Sempra Utilities analysis consist of determining which NTP&S category reported incremental costs in excess of $225,000 for 2009? If the response is anything other than an unqualified affirmative, please describe the analysis in detail, including each factor considered in that analysis.
   3. Which categories of the Sempra Utilities’ 2009 NTP&S were included in the calculation of the 87% figure?
3. At Ex. SCG-233, p. 13, l. 19, the testimony uses the term “balanced incentive.” Please describe in detail how the Sempra Utilities’ use that term, including but not limited to identifying and describing each factor the utilities believe should be considered in determining whether an incentive is “balanced.”

1. At Ex. SCG-233, p. 20, ll. 12-15, the testimony states, “Currently, both SCG and SDG&E are evaluating the economics of the Mover Services Program to see if this service is still economic to offer given the increased risk and reduced realized revenue to shareholders a 70/30 split between shareholders and ratepayers entails.”
   1. Please provide all evaluations of the economics of the Mover Services Program that SCG or SDG&E performed prior to submitting the advice letter seeking authorization of the Mover Services Program.
   2. Please provide all evaluations of the economics of the Mover Services Program that SCG or SDG&E has performed subsequent to submitting the advice letter seeking authorization of the Mover Services Program.
2. At Ex. SCG-233, p. 2, ll. 10-12, the Sempra Utilities state, “The Commission has long recognized these benefits, and has adopted accounting and other safeguards to prevent utilities from using tariffed products and services to cross-subsidize their NTP&S.”
   1. Please provide the Sempra Utilities’ full and complete understanding of the accounting safeguards the Commission has adopted for SCE, including a cite to each specific decision that has adopted such safeguards.
   2. Please provide the Sempra Utilities’ full and complete understanding of the accounting safeguards the Commission has adopted for PG&E, including a cite to each specific decision that has adopted such safeguards.
   3. Please provide the Sempra Utilities’ full and complete understanding of the accounting safeguards the Commission has adopted for the Sempra Utilities, including a cite to each specific decision that has adopted such safeguards.
   4. Please provide the Sempra Utilities’ full and complete understanding of the “other” safeguards the Commission has adopted for SCE, including a cite to each specific decision that has adopted such safeguards.
   5. Please provide the Sempra Utilities’ full and complete understanding of the “other” safeguards the Commission has adopted for PG&E, including a cite to each specific decision that has adopted such safeguards.
   6. Please provide the Sempra Utilities’ full and complete understanding of the “other” safeguards the Commission has adopted for the Sempra Utilities, including a cite to each specific decision that has adopted such safeguards.
3. At Ex. SCG-233, p. 20, ll. 17-20, the testimony states, “While it is not explicit, it appears that TURN’s testimony supports a 70/30 sharing mechanism for some NTP&S and a 90/10 mechanism for others, as is the case for SCE, yet TURN offers no specifics as to how this should be accomplished.”
   1. Please cite by page number each specific portion of TURN’s testimony that the Sempra Utilities believe represent TURN’s support for a 70/30 sharing mechanism for some NTP&S.
   2. Please cite by page number each specific portion of TURN’s testimony that Sempra believes represent TURN’s support for a 90/10 sharing mechanism for some NTP&S.
4. At Ex. SCG-233, p. 22, ll. 5-7, the testimony states, “It is important to note that the total utility cost, referred to by Mr. Finkelstein, are [sic] either sunk costs, or costs that if otherwise not spent would have accrued to shareholders between rate cases cycles.”
   1. Please define in detail “total utility cost” as that term is used on lines 1 and 32 of p. 4 of Ex. SDG&E-40.
   2. For the Mover Services Program proposed by SCG and SDG&E, please identify with as much specificity as practicable each and every utility cost that would be part of the “total utility cost” as that term is used on lines 1 and 32 of p. 4 of Ex. SDG&E-40.
5. At Ex. SCG-233, p. 22, l. 11-14, is the word “shareholders” an error? If not, please explain how shareholders would get 100% of the forecast revenues.
6. As a follow-up to the response to question 6 of TURN’s 28th set of data requests:
   1. Please provide the best estimate available to the Sempra Utilities of the costs and revenues recorded to date for pipeline services in 2011, with the understanding that these figures may change between now and when the utilities submit the corresponding 10-K filing with the SEC in early 2012.
   2. Please identify with as much specificity as practicable each and every utility cost that would be part of the “total utility cost” (as that term is used on lines 1 and 32 of p. 4 of Ex. SDG&E-40) of providing pipeline services in 2009.
   3. Please describe in detail the “maintenance of gas facilities” that produces pipeline services revenues (Ex. SCG-32R, p. 4). Please include in the description whether such maintenance is exclusively provided on a one-time basis or whether it is ever provided over a period of time to a customer. Please also include a description of how the utility calculates and assesses the fees charged to recipients of pipeline services.