

**TURN DATA REQUEST
TURN-SCG-DR-42
SOCALGAS 2012 GRC – A.10-12-006
SOCALGAS RESPONSE**

DATE RECEIVED: NOVEMBER 2, 2011

DATE RESPONDED: NOVEMBER 11, 2011

1. The rebuttal testimony of Ms. Orozco-Mejia alleges that TURN made a mistake in reporting measurement and regulation costs.
 - a. Please confirm that the source of the allegedly erroneous 2010 data used by TURN throughout its testimony was the spreadsheet provided by Sempra entitled “2010 Recorded Operating Costs -SCG.xls” and the tab “2010 SCG Adj-Rec”.
 - b. Please provide documentation demonstrating that the figures provided in DRA-SCG-065-DAO, Q2 are in fact correct and that the data provided in the spreadsheet used by TURN was in fact erroneous.
 - c. If soCal in fact made the error on its summary spreadsheet as compared to the different figures provided in DRA-SCG-065-DAO, Q2, please explain how the error was made and why it was not found before the spreadsheet was delivered to TURN.
 - d. Please explain why SoCal did not inform TURN that the 2010 data spreadsheet that it provided to TURN contained this alleged error.
 - e. Did SoCal make any other errors in its spreadsheet entitled “2010 Recorded Operating Costs = SCG.xls” and the tab “2010 SCG Adj-Rec”. If so, please identify them.
 - f. Did SDG&E make any errors in its spreadsheet entitled “2010 Recorded Operating Costs = SDGE.xls” and the tab “2010 SDGE Adj-Rec”. If so, please identify them

SoCalGas Response:

- a. There was no erroneous data in the spreadsheets “2010 Recorded Operating Costs – SCG.xls”. SoCalGas points to two specific workpaper numbers in the file: 2GD000.002 refers to Locate and Mark, while 2GD002.000 is for Measurement and Regulation. The workpaper identification numbers are quite similar; however, the data contained in the file does not contain erroneous expense data for any area of Gas Distribution. It appears that TURN used the 2010 expense data for *Locate & Mark, rather than that of M&R* in its arguments against SoCalGas’ forecast for the M&R workgroup.
- b. The 2010 expense data shown in response to DRA-SCG-065-DAO, Q2 and that contained in the file “2010 Recorded Operating Costs – SCG.xls” are exactly the same. Please see SoCalGas’ clarification in response to Question (a) above.
- c. Please see response to Question 1a above.
- d. Please see response to Question 1a above.
- e. While the 2010 expense data that is referenced in this response is limited to the area of Gas Distribution, SoCalGas is not aware of any errors contained within the file containing the 2010 expense data.
- f. SoCalGas is not aware of any errors contained in the spreadsheet “2010 Recorded Operating Costs – SDGE.xls”.