Question #1:

Conceptually what specific costs should the compression rate adder recover?

Response #1:

The compression rate adder is designed to recover costs necessary to make utility NGV stations available to the public. These costs include the O&M operating costs and electrical costs to provide the compression required for natural gas vehicle fueling. They also include the capital related costs of return, depreciation and taxes as normally charged for rate base assets.

Question #2:

Should the compression rate adder be just equal to the average cost per therm of providing both fleet and public access refueling services at those stations which provide public access refueling (the total annual cost of service associated with owning and operating public access refueling stations divided by total throughput (including both fleet and public access refueling volumes)?

A. If not, why not?

Response #2:

The compression rate adder includes the incremental costs associated with providing public access fuel at utility NGV stations. The utility has constructed a network of NGV stations at operating bases to provide fuel for utility fleet vehicles. Thus, costs to construct and operate these stations represent sunk costs that will occur regardless of whether public access is provided or not at these stations. Consistent with Public Utilities Code 740.3, that directs the Commission to "implement policies to promote the development of equipment and infrastructure needed to facilitate the use of electric power and natural gas to fuel low emission vehicles", SoCalGas has elected to provide public access at some utility NGV stations and include the incremental costs of such service in the compression rate adder. Thus, it is reasonable that the compression rate adder was developed using only incremental costs. The utilities propose to continue the current methodology.

Question #3:

Please clearly and completely describe the methodology that was used to develop the proposed compression rate adders for SoCalGas and SDG&E shown in the 2013 TCAP Testimony.

A. In what ways does this methodology differ from the methodology that was used to develop the compression rate adders that were adopted in the 2009 BCAP proceedings for SoCalGas and SDG&E?

Response #3:

First, the capital related costs were determined by calculating the NGV Public Access Rate Base. This was done by applying the net book value of NGV Public Access as a percent of Total Utility Assets to the Total Utility Authorized Rate Base. Second, the return was calculated using the Utility's authorized rate of return. Also, included in the capital costs are depreciation expense and tax expenses. These costs were also allocated to the NGV Public Access Stations on a similar basis to rate base.

The O&M costs were determined by using average O&M expense recorded data in year 2010 and applied to the recorded NGV volumes for year 2010. The electric costs were determined by using an average cost of electrical expense recorded data in year 2010 and applied to the recorded NGV volumes for year 2010. Please see section 2, pages 1-4 of Mr. Bonnett's workpapers.

A) There is no difference in methodology from the 2009 BCAP.

Question #4:

Were new cost-of-service studies conducted to provide a sound empirical basis for the developing the compression rate adders proposed for SoCalGas and SDG&E in the 2013 TCAP?

A) If new cost-of-service studies were not conducted, why not?

Response #4:

Yes, the costs associated with the NGV Compression Cost Adder were updated for the 2013 TCAP. Costs are based on 2010 data.

A) N/A

Question #5:

In Table 3 (page 13) of Mr. Bonnett's testimony for Southern California Gas Company and in Table 3 (page 14) of Mr. Bonnett's testimony for SDG&E there are column headings that say "10-1-2011 Volumes," "10-1-2011 Revenue," "Oct-1-11 Volumes," "October-1-11 Revenue," "Jan-1-13 Volumes," and "Jan-1-13 Revenue."

- B. Do the numbers shown in the Oct-1-11 or 10-1-2011 Volumes and Revenues columns represent recorded and forecast volumes and revenues for calendar year 2011 or for some other point in time or time period?
- C. Do the Jan-1-13 Volumes and Revenue represent forecast annual volumes and revenues for calendar year 2013 or for some other time or time period?

Response #5:

- B) The data shown in the "Oct-1-11 or 10-1-2011 Volumes" columns are forecast volumes for the 2009 BCAP period (2010 thru 2012), as approved in Decision 09-11-006. The Revenues are calendar year 2011 as approved per Advice letters 2055-G, and 4269.
- C) The data for the "Jan-1-13 Volumes" are the forecasted volumes for the proposed TCAP period (2013 thru 2015) and the "Jan-1-13 Revenue" are the forecasted revenue for the calendar year 2013.

Question #6:

Mr. Bonnett's workpapers show the assumptions that the "electricity expense" for SoCalGas' NGV stations is \$0.130/ccf (as shown in the SoCalGas Section 2 workpapers on page 1) while the corresponding electricity expense for SDG&E stations is \$0.45/ccf (as shown in the SDG&E Section 2 workpapers on page 1).

- A. What is the explanation for why electricity expense at SoCalGas' refueling stations is so much lower than the electricity expense for SDG&E's stations?
 - B. Why is SDG&E's electricity expense so much higher?

Response #6:

- A) The electricity expense is incurred to operate the compressors which compress the natural gas for use in vehicles and contains both fixed and variable cost components. Thus, since SoCalGas has more throughput to help offset the fixed costs of operating the compressors its per unit cost is lower than SDG&E.
- B) Similar to electricity expenses used in the 2009 BCAP SDG&E's electricity costs are higher due to greater throughput at SoCalGas.

Question #7:

Which SoCalGas and SDG&E witness or witnesses are responsible for forecasting public access refueling station retail deliveries in 2013 for SoCalGas' and SDG&E's public access refueling stations?

Response #7:

There is no specific witness however, as part of updating the compressor rate adder both SoCalGas and SDG&E updated throughput using the prior year's recorded volumes, consistent with the 2009 BCAP.

Question #8:

What is the explanation for the assumption that public access refueling throughput at SoCalGas' public access stations will decline from 1,484 Mth in 2011 to 1,063 Mth in 2013.

Response #8:

Both throughput amounts are based on actual recorded data. The 1,484 Mth is based on 2007 recorded data and the 1,063 Mth is based on 2010 recorded data. Although many factors account for the difference in throughput year-to-year the main driver behind the drop in recorded throughput from the last BCAP to the proposed TCAP was the outsourcing to a third party of the Anaheim base NGV station.

Question #9:

If forecast public access refueling is projected to decline sharply at SoCalGas, why are public access refueling volumes forecast to increase at SDG&E from 119 Mth as in 2011 to 146 Mth in 2013?

Response #9:

Both throughput amounts are based on actual recorded data. The 119 Mth is based on 2007 recorded data and the 146 Mth is based on 2010 recorded data. Although many factors account for the difference in throughput year-to-year the main driver behind the increase in recorded throughput from the last BCAP to the proposed TCAP is the growth in the number of customers' compressed natural gas vehicles.

Question #10:

Do the compression rate adders proposed by SoCalGas and SDG&E for 2013 reflect a "Sempra-wide rate?" If so, why do the proposed compression rate adders for the two utilities differ? If the intention is to have a Sempra-wide compression rate adder, what is the explanation for the differences?

Response #10:

The compression rate adders proposed for SoCalGas and SDG&E do reflect a Semprawide rate. However, each utility has its own Franchise Fees & Uncollectible factor which account for the rate difference between the two utilities. Franchise Fees & Uncollectible factors are not included in the "averaging calculation" of other Sempra-wide rates such as Electric Generation and Transmission Level Service. The Sempra-Wide calculation for both utilities is found in section 1, page 61 of 133 of Mr. Bonnett's SoCalGas workpapers.

Question #11:

For each utility, what is the number of public access refueling stations that SoCalGas and SDG&E have operated in each year from 2009 through 2011? For each utility, what is the number of public access refueling stations that SoCalGas and SDG&E project will be in operation in 2012 and 2013?

Response #11:

From 2009 through 2011, SoCalGas operated 10 public access compressed natural gas vehicle refueling stations and SDG&E operated 3 public access compressed natural gas vehicle refueling stations. In 2012 and 2013, it is expected that SoCalGas will operate 11 public access compressed natural gas vehicle refueling stations and SDG&E will operate 3 public access compressed natural gas vehicle refueling stations.

Question #12:

Based on Mr. Bonnett's testimony, SDG&E is proposing that its compression rate adder be \$0.66362 per therm in 2013 (Table 3, line 7).

- A. Where in the testimony or the workpapers supporting Mr. Bonnett's testimony is the derivation of the \$0.66362 number shown?
- B. If the derivation is not shown, please explain how the \$0.66362 number was derived.

Response #12:

- A) \$0.66362 is a Post-Sempra-Wide rate. The derivation of the "Pre-Sempra-Wide" rate is found in Section 2 of Mr. Bonnett's SDGE workpapers. The Post-Sempra-Wide calculation for both utilities is found in section 1, page 61 of 133 of Mr. Bonnett's SoCalGas workpapers.
 - B) N/A

Question #13:

Based on Mr. Bonnett's testimony, SoCalGas is proposing that its compression rate adder be \$0.65983 per therm in 2013 (Table 3, line 30).

- A. Where in the testimony or the workpapers supporting Mr. Bonnett's testimony is the derivation of the \$0.65983 number shown?
- B. If the derivation is not shown, please explain how the \$0.65983 number was derived.

Response #13:

- A) \$0.65983 is a Post-Sempra-Wide rate. The derivation of the "Pre-Sempra-Wide" rate is found in Section 2 of Mr. Bonnett's SCG workpapers. The Post-Sempra-Wide calculation for both utilities is found in section 1, page 61 of 133 of Mr. Bonnett's SoCalGas workpapers.
 - B) N/A

Question #14:

In his 2009 BCAP testimony for SoCalGas regarding the compression rate adder, SoCalGas' witness Herbert S. Emmrich identifies the O&M costs for public access stations in Table 25 (corrected) as being \$0.631/ccf (in 2007 \$). In Mr. Bonnett's workpapers (page 1 of 4) he identifies NGV station O&M Expense as \$0.417/ccf, but doesn't specify in what year's dollars the cost figure is denominated.

- A. Do the \$0.631/ccf and \$0.417/ccf numbers measure the same costs on a consistent basis?
- B. Please provide a complete explanation of why SoCalGas' public access NGV station O&M expense would decline by 33.9 percent between 2009 and 2013.
- C. What are the cost drivers that would explain this decline during a period when inflation alone would tend to be driving station O&M expense higher?

Response #14:

- A) The compressed natural gas (CNG) fueling station O&M cost of \$0.631/ccf was measured in 2007 \$s and the CNG fueling station O&M cost of \$0.417/ccf was measured in 2010 \$s. There are no changes in calculation methodology.
- B) The main drivers behind the decrease in O&M costs are CNG vehicle fueling station maintenance staff was reduced from 8 FTEs to 6 FTEs and 1 SoCalGas utility CNG fueling station was outsourced to a third party.
 - C) See response to question 14B.

Question #15:

In what year's dollars is the cost information in Mr. Bonnett's testimony on the compression rate adders and in Section 2 of his workpapers measured?

Response #15:

The cost information is measured in 2010 dollars.

Question #16:

In Mr. Bonnett's testimony on behalf of SoCalGas, in discussing the NGV Compression Cost Update on page 6 of his testimony, the witness says: "The NGV Compression Rate Adder has been updated to reflect current costs and proposed allocation of those costs. This amount is composed of the return on ratebase plus the capital related revenue requirement and any related operations & maintenance expense. The embedded cost compression revenue requirement for SoCalGas is \$670,000. The proposed revenue requirement is lower due to reduction in capital related expenses."

- A. What is the relevance of the "embedded cost compression revenue requirement" to the amount of revenue that should be recovered from the compression rate adder?
- B. Please clearly and completely explain the reduction in capital related expenses that the witness is referring to. The reduction is from what level to what new level? What specifically is driving the reduction in SoCalGas' capital related expense associated with providing public access refueling services?

Response #16:

- A) It is relevant because the \$670,000 is the amount of revenue that should be recovered from the "Pre-Sempra-Wide" compression rate adder.
- B) The capital revenue requirement has decreased since the last BCAP due to the decrease in Net Book Values of the NGV Stations from 2007 to 2010. During this time period there have not been significant increases in capital investments added to the NGV stations. As a result of ongoing depreciation being booked the net book values for the NGV stations have

decreased. Thus the return on capital and related costs of depreciation and taxes have decreased since the last BCAP.

Question #17:

SoCalGas' compression rate adder should decline by 28% from \$0.91613/therm to \$0.65983 per

In Table 3, line 30 of Mr. Bonnett's testimony on behalf of SoCalGas, he proposes that

therm despite the fact that forecast throughput is also projected to decline by 28.4 percent from

1,484 Mth in 2011 to 1063 Mth in 2013.

A. Don't these rates and volume numbers suggest that the SoCalGas' cost of

providing public access refueling services will decline from \$1,360,000 to \$701,000, or by 48

percent between 2011 and 2013?

B. If this assumption is correct, please provide a clear and complete

explanation of how it is possible for the cost of providing public access refueling services at

SoCalGas to decline by such an amount over two years; what specific costs are being reduced

and by how much; and what is driving these cost reductions.

Response #17:

A) Yes, the revenue requirement is proposed to decrease 48% from 2011.

B) The main driver behind the proposed change is a reduction in O&M costs.

Overall, the rate is proposed to decrease approx. (\$0.26)/therm from current rates due to:

\$0.04/th due to updated volumes

(\$0.21)/th due to updated O&M rate

(\$0.05)/th due to updated electric rate

(\$0.01)/th due to updated Capital-related costs

(\$0.02)/th due to Sempra-Wide and Attrition adjustments

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Question #18:

As previously noted, Mr. Bonnett's testimony says that: "The embedded cost compression revenue requirement for SoCalGas is \$670,000. If that is the case, why does Table 3, line 30 show revenues at proposed rates in 2013 of \$701,000?

A. What is the explanation for the difference in these two numbers?

Response #18:

The \$670,000 figure is pre Sempra-wide amount whereas the \$701,000 figure is a post Sempra-wide amount.

A) Pursuant to the response to Question 12, the requested pre-Sempra-Wide rate derivation can be found in section 1, page 61 of 133 of Mr. Bonnett's SoCalGas workpapers.

Question #19:

In Mr. Bonnett's testimony on behalf of SDG&E, at page 10, the witness says: The embedded cost compression revenue requirement for SDG&E is \$128,000.

- A. If that is the case, why does Table 3, line 7 show revenues at proposed rates in 2013 of \$97,000?
- B. If the embedded cost compression revenue requirement for SDG&E is forecast to be \$128,000 in 2013 and the forecast public access refueling throughput is 146 Mth, why isn't the proposed compression rate adder for SDG&E \$0.877 per therm (\$128,000/146,000) rather than the \$0.66362 per therm number shown under the column headed "Proposed Rates" on Table 3 at line 7. Under the column headed "Public Access Station" on page 1 of Mr. Bonnett's workpapers for SDG&E, the compression rate is shown as \$0.88 not \$0.66 per therm.

Response #19:

- A) The \$128,000 figure is pre Sempra-wide amount whereas the \$97,000 figure is a post Sempra-wide amount. Pursuant to the response to Question 12, the requested rate derivation can be found in section 1, page 61 of 133 of Mr. Bonnett's SoCalGas workpapers.
- B) Pursuant to Section 2, page 1 of Mr. Bonnett's SDG&E's workpapers, SDG&E's compression rate adder would be \$0.88 if not for the Sempra-wide calculation.

Question #20:

Table 3 on page 13 of Mr. Bonnett's testimony for SoCalGas indicates that the revenue from charging the compression rate adder at current rates is \$1,360,000. At the proposed rate, the revenue from the compression rate adder in 2013 is forecast to be \$701,000. Does SoCalGas believe that the costs of providing public access refueling services at SoCalGas' NGV refueling stations will decline from \$1,360,000 in 2011 to a forecast amount of \$701,000 in 2013?

- A. If not, what is the projected decline?
- B. What is the basis for the assumption that the costs will decline rather than increase?

Response #20:

- A). Yes, provided that the throughput is consistent with 2010's throughput and that the expense rates remain constant.
- B) These rates are lower than current rates for two primary reasons. First, is due to a reduction in O&M rate. As shown in response to Question 17, the rate for O&M costs decreased by approximately \$0.21 per therm which is roughly 82% of the overall decrease. Second, since the majority of the \$701,000 in costs are determined on a variable–cost basis, and, since the volumes are much lower than in current rates, the total costs decrease.

Question #21:

The first column in the Table shown on page 1 of the workpapers for SoCalGas under the heading of "Total Public & Private Access" shows a compression rate per therm of \$1.09.

- A. Is this number the average cost of providing public access and fleet refueling at SoCalGas' NGV refueling stations that provide public access refueling?
 - B. If not, what does this number measure?

Response #21:

- A) Yes, it is the average cost of providing public access and utility-fleet refueling at SoCalGas' NGV refueling stations that provide public access refueling.
 - B) N/A

Question #22:

The first column in the Table shown on page 1 of the workpapers for SDG&E under the heading of "Total Public & Private Access" shows a compression rate per therm of \$1.10.

- A. Is this number the average cost of providing public access and fleet refueling at SDG&E's NGV refueling stations that provide public access refueling?
 - B. If not, what does this number measure?

Response #22:

- A) Yes, it is the average cost of providing public access and utility-fleet refueling at SDG&E's NGV refueling stations that provide public access refueling.
 - B) N/A

Question #23:

What is the forecast "fully allocated" or "fully loaded" cost-of-service associated with owning and operating SoCalGas' NGV refueling stations or facilities which provide public access refueling services in 2013, disaggregated between O&M and capital-related-expenses?

A. What is the forecast throughput for those stations in 2013, broken down by utility fleet vehicle refueling and public access refueling?

Response #23:

Pursuant to Section 2, page 1 of Mr. Bonnett's SoCalGas workpapers the requested information is as follows:

Forecast fully	allocated cost \$/	<u>year</u>
Total O&M =	\$	765,000

Total Capital related = \$792,000

Total Cost = \$1,557,000

A) Forecast Throughput Mtherms/year

Public Use = 1,063 Mth

SCG Fleet = 368 Mth

Total = 1,431 Mth

Question #24:

What is the forecast "fully allocated" or "fully loaded" cost-of-service associated with owning and operating SDG&E's NGV refueling stations or facilities which provide public access refueling services in 2013, disaggregated between O&M and capital-related-expenses?

A. What is the forecast throughput for those stations in 2013, broken down by utility fleet vehicle refueling and public access refueling?

Response #24:

Pursuant to Section 2, page 1 of Mr. Bonnett's SDG&E workpapers the requested information is as follows:

Forecast fully allocated cost \$/year

Total O&M = \$177,000

Total Capital related = \$52,000

Total Cost = \$229,000

A) Forecast Throughput Mtherms/year

Public Use = 146 Mth

SDG&E Fleet = 62 Mth

Total = 208 Mth

Question #25:

The third column of data on page 1 of the Section 2 workpapers for both SoCalGas and SDG&E is labeled "Public Access Station."

- A. What do the numbers in these columns represent?
- B. Is the information for public access stations in total or just the portion of the public access stations related to providing public access rather than utility fleet refueling services?

Response #25:

- A) Public Access Station represents the incremental costs of station use by public access customers (i.e. non-Utility fleet vehicles).
- B) It is just the portion of the public access stations related to providing public access rather than utility fleet refueling services.