**A.14-11-003 and A.14-11-004 Sempra Utilities’ 2016 TY GRC**

**TURN Data Request**

**Data Request Number:** TURN-SCG-11 (Fleet and Facilities)

**Date Sent:** April 8, 2015

**Response Due:** April 22, 2015

Please provide an electronic response to the following questions. A hard copy response is unnecessary. The response should be provided on a CD sent by mail or as attachments sent by e-mail to the following:

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| --- | --- | --- |
| Bob FinkelsteinThe Utility Reform Network (TURN)785 Market Street, Suite 1400San Francisco, CA 94103bfinkelstein@turn.org  | Garrick JonesJBS Energy311 D Street, Suite AWest Sacramento, CA 95605garrick@jbsenergy.com  |  |

For each question, please provide the name of each person who materially contributed to the preparation of the response. If different, please also identify the Sempra Utilities witness who would be prepared to respond to cross-examination questions regarding the response.

For any questions requesting numerical recorded data, please provide all responses in working Excel spreadsheet format if so available, with cells and formulae functioning.

For any question requesting documents, please interpret the term broadly to include any and all hard copy or electronic documents or records in the possession of either of the Sempra Utilities.

1. **Facilities** -- In Exhibit SCG-15-CWP, page 12, SoCalGas states, “The current replacement value is routinely updated by SoCalGas Plant Accounting, where the original acquisition or development costs are escalated by a historic construction cost escalation index (the Handy-Whitman Index of Public Utility Construction Costs, the “Handy-Whitman Index”).
	1. Please provide the current replacement value from the routine updates by Plant Accounting that best reflect the year-end value for each year from 2009-2014, inclusive.
	2. Please describe in detail the routine updates performed by SoCalGas Plant Accounting, included but not limited to the purpose served by such updates, how often those updates are performed, and the date and results of the most recent routine update.
2. **Facilities** --Please provide a complete copy of the responses to ORA-SCG-DR-083-SWC, including all confidential material and all of the Excel files referred to in the responses.
3. **Fleet** -- Please provide a complete copy of the responses to ORA-SCG-DR-084-SWC, including all confidential material and all of the Excel files referred to in the responses.
4. **Facilities** -- Do any of the forecasts for Infrastructure & Improvements for SoCalGas (SCG-15, pp. 23-24) include an amount for “unplanned projects” similar to those that appear in the SDG&E forecast for its Infrastructure/Reliability Blanket, as discussed in the response to ORA-SDG&E-DR-021-SWC, question 2? If so, please identify the amount of costs associated with “unplanned projects” recorded in 2009-14, inclusive, and included in the forecasts for 2014-16, inclusive.
5. **Facilities** --The workpapers for Facility Renovations for Future Requirements in SCG-15-CWP, pp. 16-24, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Facility Renovations for Future Requirements during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility’s testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.
6. **Facilities** -- The workpapers for Sustainability Projects in SCG-15-CWP, pp. 25-45, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Sustainability Projects during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility’s testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.
7. **Facilities** -- Please describe the current status of the PV system installations and Demand Response (DR) control system installations described in SoCalGas’s workpapers from the 2012 GRC (SCG-14-CWP, p. 10), and the annual recorded costs for each in 2012-2014, inclusive.
8. **Facilities** -- The workpapers for Compliance/Systems Upgrades SCG-15-CWP, pp. 46-79, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Compliance/Systems Upgrades during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility’s testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.
9. **Facilities** -- The workpapers for NGV Refueling Stations in SCG-15-CWP, pp. 80-90, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as NGV Refueling Stations during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility’s testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.
10. **Facilities** -- Please describe the current status of the NGV Station infrastructure projects described in SoCalGas’s workpapers from the 2012 GRC (SCG-14-CWP, pp. 30-32), and the annual recorded costs in 2012-2014, inclusive.
11. **Fleet** -- At SCG-15, p. 3, footnote 1 refers to “U.S. Department of Energy; EPAct Fleet Information and Regulations.” Please identify with specificity each specific document or regulation SoCalGas is referring to with this cite.
12. **Fleet** -- At SCG-15, p. 3, SoCalGas states that it plans to buy alternative fueled vehicles at a premium to achieve the 90% annual requirement under the EPAct.
	1. Please describe in detail the analysis SoCalGas performed to compare the costs and benefits of buying alternative fueled vehicles rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.
	2. Please describe in detail the analysis SoCalGas performed to compare the costs and benefits of purchasing EPAct credits rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.
13. **Fleet** -- At SCG-15, pp. 4 and 15, SoCalGas states that the Vehicle Servicing & Repairs costs include costs for retrofitting the SoCalGas fleet of over-the-road vehicles with backup cameras and backup sensors to try to help prevent the number of backup incidents.
	1. Please confirm that the costs in Vehicle Servicing & Repairs are for SoCalGas’s existing fleet of over-the-road vehicles, and are in addition to the costs of having backup cameras or backup sensors installed in new vehicles.
	2. For each year from 2009-2014, inclusive, please state the number of backup incidents that occurred with the SoCalGas fleet of over-the-road vehicles. Please describe the five most common types of backup incidents, and provide the number of incidents of each type in each year.
	3. For each year from 2009-2014, inclusive, please state the amount of claims paid out by SoCalGas due to backup incidents involving the SoCalGas fleet of over-the-road vehicles.
	4. For each year from 2009-2014, inclusive, please briefly describe the five most common costs incurred by SoCalGas due to backup incidents involving the SoCalGas fleet of over-the-road vehicles, and the amount of each such cost.
14. **Facilities** -- At SCG-15, page 4, SoCalGas states that Facility Operations is responsible for the operation and maintenance of utility facilities which encompass 1.7 million square feet of 80 manned locations and 26 telecommunications sites. For each year from 2009-2014, inclusive, please provide the year-end amount of square feet, manned locations, and telecommunications sites.
15. **Facilities** -- At SCG-15, pages 4-6, SoCalGas provides a summary of some key activities for the Facilities Operations. For each key activity listed here, please identify and describe in general the five most material changes that have occurred since 2012, and the date each such change went into effect. Please also provide SoCalGas’s best estimate of the impact each change has on its forecasted activities and costs for 2014, 2015 and 2016.
16. **Fleet** -- At SCG-15, page 8, in Table CLH-4, SoCalGas lists year-end 2013 figures for vehicle types in seven different categories. Please provide the year-end figures for 2008-12 and 2014 for each category of vehicle.
17. **Fleet --** In the workpapers SCG-15-WP, page 13, the “Incremental Fleet for Business Needs” lists the number of vehicles forecasted for each of five SCG Organizations. For each of the five SCG Organizations:
	1. For each year from 2009-2013 please state the number of FTEs and the number of fleet units.
	2. For 2014, please state the number of incremental fleet units actually leased.
18. **Fleet --**  At SCG-15, page 10, SoCalGas states, “In line with California state initiatives and regional and multi-agency efforts seeking ozone reductions in the range of 70% to 80% in all sectors, including the transportation sector’s contribution toward meeting California’s GHG goals, SoCalGas is supporting this initiative to grow its natural gas fleet by replacing and/or retrofitting traditional gas and diesel vehicles. See Ex. SCG-15-WP Amortization and supplemental for further detail.”
	1. Other than the line item for “Replacements with Alternative Fuel Vehicles (AFV)” on page 11 of SCG-15-WP, please identify by page number each place in SCG-15-WP that provides further detail for the amortization costs associated with SoCalGas’s initiative to grow its natural gas fleet.
	2. For each year from 2014-2016, inclusive, please state the number of natural gas vehicles reflected in SoCalGas’s forecast for “Replacements with Alternative Fuel Vehicles (AFV) on page 10 of SCG-15-WP. Please also state the number of natural gas vehicles actually obtained in 2014, and the associated recorded amortization cost.
	3. For each year from 2009-14, please state the number of vehicles SoCalGas converted to NGVs, and the associated cost.
	4. For each year from 2009-14, please state the number of new NGVs SoCalGas obtained through purchase or lease, and the associated cost.
19. **Fleet --** In the workpapers SCG-15-WP, page 26, SoCalGas provides a Fleet Salvage Forecast Supplemental Workpaper.
	1. For the 3-year average salvage value of $2,495.95, please provide the three years of data for the number of salvage units and the total salvage value recorded.
	2. For 2014, please provide the number of salvage units recorded and the total salvage value from those units. Please exclude any proceeds from 2013 auctions posted in 2014.
	3. For each year from 2009-2013, please state the amount of salvage proceeds recorded from auctions performed in the preceding year (for example, proceeds recorded in 2013 from auctions performed in 2012).
	4. Please identify and briefly describe the three factors that have the greatest material impact on SoCalGas having an average salvage value of approximately $2,500 when SDG&E has an average salvage value of $3,500 during the same period (as indicated on SDGE-16-WP, p. 27).
20. **Fleet --** In the workpapers SCG-15-WP, page 45, SoCalGas includes Forecast Adjustment Details to its Automotive Fuels forecast for 2014, 2015 and 2016 to reflect forecasts of additional vehicles in each of those years.
	1. For each year from 2014-2016, inclusive, of the number of additional vehicles listed in the workpaper, how many are expected to be NGV?
	2. For each year from 2014-2016, how many vehicles in SoCalGas’s existing fleet does the utility expect to convert to NGVs?
	3. When SoCalGas uses natural gas as a fuel for its fleet provided from the utility’s own refueling facilities, is there a cost for the natural gas used as fuel? If so, please state the price SoCalGas charges itself for natural gas used as a fuel.
21. **Facilities** -- At SCG-15, page 20, Table CLH-9 shows Shared Facility Operations O&M costs for 2013 (adjusted-recorded) and 2016 (estimated). In the 2012 GRC, at SCG-14, page 8, Table SCG-DGT-4 shows Shared Facility Operations O&M costs for 2009 (adjusted-recorded) and 2012 (estimated).
	1. Please identify and briefly describe all cost categories that were included in the 2012 Shared Facility Operations O&M costs but omitted from the 2016 Shared Facility Operations O&M costs.
	2. Please identify and briefly describe all cost categories that were included in the 2016 Shared Facility Operations O&M costs but omitted from the 2012 Shared Facility Operations O&M costs.
22. **Facilities** -- In the workpapers SCG-15-CWP-FAC, page 8, for the category “Infrastructure & Improvements” SoCalGas includes adjustments in each year from 2009-13 described as, “Adjustment to add back SoCalGas Inter-Comp Receiving Billing Orders.” Please describe in detail the “SoCalGas Inter-Comp Receiving Billing Orders.” Please also explain why the amounts with this description vary from $15.3 million to ($0.257) million during the 2009-2013 period.
23. **Facilities** -- At SCG-15, page 23, Table CLH-11 includes a capital expenditure category of “Infrastructure & Improvements.” In the 2012 GRC, at SCG-14, page 13, Table SCG-DGT-5 includes a capital expenditure category of “Infrastructure & Improvements Blanket.”
	1. Please identify and briefly describe all categories or types of costs that were included in the 2012 Infrastructure & Improvements Blanket but omitted from the 2016 Infrastructure & Improvements category.
	2. Please identify and briefly describe all categories or types of costs that were included in the 2016 Infrastructure & Improvements category but omitted from the 2012 Infrastructure & Improvements Blanket.
24. **Facilities** -- At SCG-15, page 23, Table CLH-11 includes a capital expenditure category of “Facility Renovation for Future Requirements.”
	1. Was there a similar capital expenditure category in the 2012 GRC for SoCalGas? If so, please identify with by volume and page number each place in SoCalGas’s testimony and workpapers from the 2012 GRC that addressed such capital expenditures.
	2. For the types of activities covered by the “Facility Renovation for Future Requirements” category, please state by year the total capital expenditures incurred by SoCalGas during the 2009-13 period, inclusive.
	3. Please state the recorded amounts in the “Facility Renovation for Future Requirements” category for 2014.
25. **Facilities** -- At SCG-15, page 23, Table CLH-11 presents five categories of capital expenditures for Facility Operations. In SoCalGas’s testimony from the 2012 GRC, the utility presented approximately sixteen separately-stated categories of facility capital projects (2012 GRC SCG 14, p. 13, Table SCE-DGT-5).
	1. Please cross reference each of the categories from the 2012 GRC testimony with the five categories presented in the 2016 GRC testimony.
	2. For each of the categories identified in the 2012 GRC testimony, please provide the recorded capital costs for each year from 2009-2014, inclusive.
	3. For each of the five categories identified in the 2016 GRC testimony, please provide the recorded capital costs for each year from 2009-2014, inclusive.
26. **Facilities** -- At SCG-15, page 25, SoCalGas describes its forecast method for Infrastructure & Improvements. The testimony refers to a International Facility Management Association (IFMA) benchmarking study conducted in 2012, and describes how information from that study was applied to the cumulative replacement value. In the workpapers SCG-15-WP, pp. 13-15, SoCalGas presents data for which the source is indicated as “IMFA Utility Council Benchmarking.”
	1. For the “current year capital renewal/GSF” figures on page 13, what is the “current year”?
	2. For the “five year average capital renewal/GSF” figures on page 13, what years are included in the “five year average”?
	3. The renewal/GSF figure on page 13 of the workpapers reflects a subset of the companies listed on pages 14-15. Was this subset created by SoCalGas or IFMA?
	4. Please identify and explain each criterion used to determine if a company included on the lists on pages 14-15 would be included in the list on page 13 of the workpapers.
	5. The companies listed on pages 14-15 lists by code from U01 to U78, but omits a number of codes and the company associated with that code (see, for example, the jump from U22 to U25, and from U31 to U34). Was the list of companies and codes on pages 14-15 as provided by IFMA, or did SoCalGas remove some of the companies and codes from material provided by IFMA.
	6. Please provide the full list available to SoCalGas of the utility companies used in the IFMA benchmarking study referred to in the SoCalGas testimony and workpapers, and the “current year capital renewal/GSF” and “five year average capital renewal/GSF” for each. Please provide the data in working Excel format.
	7. Please identify and explain each criterion used to determine if a company and its code would be included in the list on pages 14-15 of the workpapers.
	8. SoCalGas and SDG&E are each identified by a code on the list on pages 14-15 (U58 and U60, respectively) but do not have renewal/GSF figures for either the “current year” or the “five year average.” For each utility, please provide the “current year capital renewal/GSF” and the “five year average capital renewal/GSF” for 2013 and 2009-13, respectively. Please also provide supporting workpapers.
27. **Facilities** -- At SCG-15, page 25, SoCalGas describes its forecast method for Infrastructure & Improvements, and describes it as “most appropriate because it is based on industry standards and reputable industry benchmarking index.”
	1. Please identify each other method SoCalGas considered in deciding which forecast method would be appropriate for this purpose in this GRC, and the reason for deciding that the adopted method was more appropriate than the other method considered but not selected.
	2. Is SoCalGas aware of other utilities that prepare cost forecasts for ratemaking purposes by relying on the IFMA-developed index to select a capital renewal rate to apply to the current replacement value to determine the forecasted amount? If so, please identify each such utility and briefly describe when and for what ratemaking purpose the utility has prepared costs forecasts in this manner.
28. **Facilities** -- In the workpapers SCG-15-WP, page 19, SoCalGas describes the non-labor cost estimates for its Facility Renovations for Future Requirements projects as being “based on unique and specific scope requirements and professional expert judgment, including vendor estimates from qualified industry professionals such as licensed architects and designers, construction industry professionals, facility management professionals, and IT domain experts.” For each of the four projects presented in this category (Chatsworth, Compton, Pico Rivera and Anaheim), please provide the following information:
	1. Identify by volume and page number of SoCalGas’s prepared testimony and workpapers all places that provide further detailed information regarding the basis of the forecast for each project (other than the workpapers at pages 21-24).
	2. The unique and specific scope requirements.
	3. All documentation of vendor estimates or other input from qualified industry professionals.
	4. The number of SoCalGas FTEs based at the facility before the renovation.
	5. The number of SoCalGas FTEs estimated to be based at the facility after the renovation.
29. **Facilities** -- At SCG-15, pages 27-28, the testimony describes sustainability projects that include installation of “solar systems at various facilities to generate renewable energy from solar photovoltaic panels….” In the 2012 GRC, at SCG-14, page 16, the testimony described facilities renewable energy efficiency projects that included installing “Rooftop PV systems at various sites to support federal, state, and company renewable energy initiatives, as well as save electric demand, energy and costs.”
	1. For each year from 2010-2014, inclusive, please state the amount SoCalGas recorded on capital expenditures for solar photovoltaic systems, and identify each site at which such systems were installed.
	2. Please provide a copy of the “company renewable energy initiatives” that were in effect at the time SoCalGas submitted its 2012 GRC application and supporting testimony.
	3. Please provide a copy of the current “company renewable energy initiatives.”
30. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP:
	1. What is the difference between Fleet Replacements 2014 through 2016 and Replacements with Alternative Fuel Vehicles (AFV) in the Amortization table?
	2. Please provide in Excel format the annual costs, recorded for each year 2009-2014 and forecasted for 2014-2016, for each line item in the Amortization table. Please also provide the annual costs for each year broken out into the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage.
	3. Please provide in Excel format the number of units associated with each line in the Amortization table on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016. Please also provide the annual number of units for each year broken out into the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage.
	4. Please separate the “New Fleet Units for Replacements” from the Fleet Replacements table into annual figures on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016, for the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage. Within each category, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.
	5. For each of the SCG Organizations listed in the Incremental Fleet for Business Needs table, please provide the recorded fleet units on a recorded year-end basis for each year 2005-2014. Within each organization, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.
31. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP:
	1. For the vehicle replacements SoCalGas is forecasting, are any occurring earlier than they would otherwise in order accelerate adding AFVs to the utility’s fleet?
	2. If so, for each year from 2014-2016, inclusive, please indicate how many vehicles are forecast to be replaced (i.) one year, (ii.) two years, (iii.) three years, (iv.) four years, (v.) five or more years earlier than would occur absent adding AFVs to the utility’s fleet.
	3. What is SoCalGas’s understanding of what would happen to the vehicles that would be replaced on an accelerated schedule, if any? Would they be demolished? Sold? Something else? To whom would they be sold if selling is the likely course of action?
32. **Fleet** -- Regarding Table CLH-5 at SCG-15, page 13,
	1. Please provide a workpaper that shows the calculation of and assumptions used to arrive at the recorded and forecasted Automotive Fuels calculations, including (but not limited to) the number of cars, the cost of fuel (both spot and hedged), and fuel efficiency assumptions in the calculations.
	2. What is the average fuel economy (miles/gallon) of SoCalGas’s current fleet of road-based vehicles? What is SoCalGas’s assumption about the average fuel economy (miles/gallon) of road-based vehicles in the Test Year? What does SoCalGas base the fuel-ecomony values on? Does the Test Year assumption include any improvement for increased AFV counts? Why or why not?
33. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP, and the “Incremental Fleet for Business Needs” showing 287 vehicles in the 2014-16 period for Field Services – CS Field and CS Operations – Meter Reading:
	1. Please provide specific documentation from SoCalGas’s AMI cost-benefit analysis and calculation of AMI benefits in $/meter/month that demonstrates that employees in CS Field and CS Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2016.
	2. Please provide specific documentation from any AMI cost-benefit analysis that SoCalGas performed to support Advice Letter 4110 that includes a calculation of AMI benefits in $/meter/month that demonstrates that employees in CS Field and CS Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2018.
	3. Please identify by volume and page number where the explanation for the reasonableness of the forecast for CS Field and CS Operations – Meter Reading vehicle needs for 2014-16 is set forth.
34. **Facilities** -- Regarding Table CLH-11 on p. CLH-23 of the SCG-15:
	1. Why are the 2015 and 2016 values for NGV Refueling Stations different than the figures that appear at Table CLH-11 of ‘ORA Request 4\_B summary SCG.xlsb’ (line 00734A)? Please reconcile the difference and identify the correct values.
	2. Regarding Sheet SCG-15 in ‘ORA Request 4 B summary.xlsb’, please provide the recorded 2014 values associated with each line item.