**CONTAINS MATERIAL DEEMED “CONFIDENTIAL” BY UTILITY AND THEREFORE SUBJECT TO PROTECTIVE ORDER**

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

**TURN Data Request**

**Data Request Number:** TURN-SCG-22 (Gas Company Tower)

**Date Sent:** June 18, 2015

**Response Due:** June 25, 2015, or at least two business days

before the relevant utility witness appears for cross-examination,

whichever is earlier

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:

|  |  |  |
| --- | --- | --- |
| 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. At page JCS-3 of SCG-216, the testimony states that SoCalGas’s workpapers identified adjustments “made to historical and forecasted costs to reflect these credits,” citing pages 15-20 of the workpapers. Regarding SCG-16-WP, pp. 15-16:
	1. Please provide a workpaper with full working cells and an identification and explanation of all assumptions used that show the development of the “Forecast Adjustment Details” for each year shown (i.e., 2014-2016).
	2. Please reconcile the values shown in the 2016 Forecast Adjustment Detail with the 2016 Basic Rent schedule on p. 8 of ‘TURN-SCG-DR-09 Q1 Attachment for GCT Rents’, as attached to the response to TURN-SCG-DR-09-01.
	3. Please reconcile the information provided in the 2016 Forecast Adjustment Details in the referenced workpapers with the 2016 values in the table provided in the response to TURN-SCG-DR-09-1c.
	4. Please identify by year and amount each adjustment made to “historical…costs to reflect these credits,” and provide workpapers with full working cells that show the calculations and assumptions used.
	5. Please identify each specific adjustment from the workpapers that accounts for the **[CONFIDENTIAL]** “Free Rent” [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease.
2. At page JCS-3 of SCG-216, the testimony refers to a portion of the response to TURN-SCG-DR-09-01. Following up on the response SCG provided to TURN-SCG-DR-09-01c:
	1. Please identify and fully explain how the forecasted Base Rent amounts for 2014-2016 reflect the **[CONFIDENTIAL]** “Free Rent” [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease.
	2. Please identify the amount by which the Base Rent identified in the table included in the body of the response (i.e., $7.698 million) is different than the Base Rent amount SCG provides in response to part a of this request. If there is a difference, please provide a detailed explanation regarding why there is a difference.
3. At p. JCS-4 of SCG-216, SCG states: “Thus, SoCalGas adopted a cycle-based, levelized forecasting methodology on the Gas Tower lease payments that attempts to spread those credits throughout the lease.”
	1. Please provide detailed workpapers that shows SCG’s “cycle-based, levelized forecasting methodology” and the “spread of those credits throughout the lease.”
	2. Please show to which years and by how much in each year SCG has “spread” the **[CONFIDENTIAL]** “Free Rent” for 2016 [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease to other years.
	3. Please identify the amount of the **[CONFIDENTIAL]** “Free Rent” for 2016 [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease that SCG applied to the 2016 forecast and identify with specificity each place in SCG’s testimony or workpapers that SCG accounted for this adjustment for 2016.
4. At p. JCS-3 of SCG-216, the testimony states, “Adjustments were made to historical and forecasted costs to reflect these credits (shown in my workpapers at page 15).”
	1. Please identify by year and magnitude each adjustment made to “historical…costs to reflect these credits,” and provide workpapers with full working cells that show the calculations and assumptions used.
	2. Why is it appropriate to make adjustments to historical Base Rent amounts for rent concessions that will happen in 2016?
	3. Please identify precisely in the workpapers where such adjustments were made and explain how they were included.
5. Please provide the excerpt of the GCT Rents lease agreement that contains the “Operating Expenses” schedule, and any explanation thereof, similar to the Basic Rent schedule shown on p. 8 of the lease agreement excerpt attached to SCG’s response to SCG-TURN-DR-09-01.
6. Regarding SCG’s presentation of GCT Rents on p. 21 of SCG-14-WP in the 2012 GRC:
	1. Please separate the NSE amounts for each recorded and forecasted year into the categories used in the table in SCG-TURN-09-01c (i.e., Base Rent, Operating Expense, and Property Tax).
7. Regarding SCG’s presentation of GCT Rents on p. 24 of SCG-14-WP in the 2012 GRC:
	1. For the 2011 Forecast Adjustment Details, SCG states that it makes an adjustment to the “estimate based on new lease agreement.” Does the adjustment include a reduction for any of the **[CONFIDENTIAL]** “Free Rent” [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease for the years 2013-2016? If so, provide the workpapers with working cells that make the adjustment. If not, why not?
	2. For the 2012 Forecast Adjustment Details, SCG states that it makes an adjustment to the “estimate based on new lease agreement.” Does the adjustment include a reduction for any of the **[CONFIDENTIAL]** “Free Rent” [**END CONFIDENTIAL]** as set forth in section 4.2 of the lease for the years 2013-2016? If so, provide the workpapers with working cells that make the adjustment. If not, why not?