**QUESTION 1:**

**These questions relate primarily to the direct testimony and workpapers of Jason Bonnett.**

Does either of the Sempra Utilities contend that it would suffer harm of any sort if the Commission were to not adopt the utility-proposed changes for residential customer charges? If the answer is anything other than an unqualified negative, please separately identify and describe in detail each harm the utility contends it would suffer if the Commission were to not adopt the utility-proposed changes for residential customer charges. If either utility contends it would be unduly burdensome to identify and describe each individual harm, please separately identify and describe the five each utility believes are most material.

**RESPONSE 1:**

The proposal is designed to better match cost incurrence with cost responsibility. As such, it generally addresses customer cross-subsidization (i.e., higher volume residential customers subsiding lower volume residential customers). The proposal is not generally designed to protect the utilities themselves from harm. It is conceivable that cross-subsidization could lead to affected customers choosing a substitute to natural gas service (e.g., electric dryers rather than natural gas dryers). But we have not attempted to quantify this potential effect, and it is not the primary driver for our proposal.

**QUESTION 2:**

At page 6, the testimony states, “The Utilities proposes [sic] to continue on the path established in D.93-06-087 and continued in D.94-12-052 toward a cost-based customer charge.” For each utility, please identify by name and application number each Commission proceeding from 1995 to the present in which the utility proposed an increase to its residential customer charge (for SoCalGas) or adoption of a residential customer charge (for SDG&E gas service).

**RESPONSE 2:**

SoCalGas: 1996 Biennial Cost Allocation Proceeding (A.96-03-031);

1999 Biennial Cost Allocation Proceeding (A.98-10-012); and

2016 Triennial Cost Allocation Proceeding Phase 2 (A.15-07-014).

SDG&E: 2013 Triennial Cost Allocation Proceeding (A.11-11-002); and

2016 Triennial Cost Allocation Proceeding Phase 2 (A.15-07-014).

**QUESTION 3:**

At pages 86 and 87 of the Workpapers of Jason Bonnett for SDG&E, there appear tables for bill impact calculations for residential customers, broken out by single-family, multi-family and CARE, as well as with other information. The equivalent table for SoCalGas (at page 174 of the SoCalGas workpapers) lacks much of the detail that appears in the SDG&E table. Please provide for SoCalGas the same tables with the same detail as provided for SDG&E at pages 86 and 87 of the SDG&E workpapers, in Excel or other native format with all cells working and formulae intact.

**RESPONSE 3:**

The data for SoCalGas is missing due to a formatting error in converting the models from Excel format to .pdf format for the workpapers. However, this information has been available in the Excel model workpapers. See the below attachment. This is based on the Workpapers to the Revised Prepared Direct Testimony of Mr. Bonnett, dated November 19, 2015.



**QUESTION 4:**

For both SoCalGas and SDG&E, please provide the same tables as provided for SDG&E at pages 86 and 87 of the SDG&E workpapers, but with the assumptions reflected in the “TCAP Proposed w/o cust. Chg” figures in column B of Table 5 of the testimony.

**RESPONSE 4:**

The requested information is attached below. The information is based on the data shown in the workpapers to the Revised Prepared Direct Testimony of Mr. Bonnett, dated November 19, 2015.



**QUESTION 5:**

5. In the SDG&E tables at pages 86 and 87 of the Workpapers of Jason Bonnett, there are four categories for the residential class – Single Family, Multi Family, CARE, and Class Average Baseline Only.

a. For the Single Family and Multi Family categories, do the data in the tables reflect non-CARE customers only? If not, please provide the tables with each of those categories broken out between CARE and non-CARE customers.

b. If the Single Family and Multi Family categories are non-CARE only as they appear at pages 86 and 87 of the SDG&E workpapers, please provide the CARE table broken out between single family and multi family customers.

c. For the Class Average Baseline Only calculations, do the data in the tables reflect non-CARE rates only? If not, please explain how CARE rates are reflected in the calculations. If so, please provide the Class Average Baseline Only table broken out between CARE and non-CARE customers.

d. For each of the tables provided in response to subsections (a) through (c) above, please also provide the table with the assumptions reflected in the “TCAP Proposed w/o cust. Chg” figures in column B of Table 5 of the testimony.

e. For each of the tables provided in response to subsections (a) through (d) above, please also provide the table for SoCalGas.

**RESPONSE 5:**

The requested information is attached below. The information is based on the data shown in the workpapers to the Revised Prepared Direct Testimony of Mr. Bonnett, dated November 19, 2015.

**a.** No, the single-family and multi-family categories contain data for both CARE and non-CARE customers. See attached Excel file below.

**b.** See response to Question 5.a.

**c.** Yes. The table containing CARE rates using only Baseline usage is attached Excel file below.

**d.** See the Excel file attached below.

**e.** See the Excel file attached below.

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**QUESTION 6:**

In Tables 3 and 4, at page 9 of the testimony, the figures represent the monthly bill increase or decrease. Please provide the monthly bill figures used to derive the figures reported in the tables, and all inputs used to calculate the monthly bill figures.

**RESPONSE 6:**

The information in Tables 3 and 4, at page 9 of Mr. Bonnett’s Revised Prepared Direct Testimony are ultimately derived from the “Res Bill” tabs of the SoCalGas and SDG&E rate design models. The monthly residential class average bill with and without customer charge scenarios are recorded on the “Model Input” tab of the SoCalGas rate design model (workpapers page 13). Tables 3 and 4, compare the information found on the “Model Input” tab of the SoCalGas rate design model. This is based on the Workpapers to the Revised Prepared Direct Testimony of Mr. Bonnett, dated November 19, 2015.

For ease of comparison, SoCalGas and SDG&E provide the attached spreadsheet showing the requested information.



**QUESTION 7:**

For SoCalGas:

a. What is the residential class average consumption (in therms) for each month? In each of those months, please state the number of residential customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

b. What is the residential single family average consumption (in therms) for each month? In each of those months, please state the number of residential single family customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

c. What is the residential multi family average consumption (in therms) for each month? In each of those months, please state the number of residential multifamily customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

d. What is the residential CARE average consumption (in therms) for each month? In each of those months, please state the number of residential CARE customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

**RESPONSE 7:**

SoCalGas uses a 5-year rolling average in determining the average monthly consumption for the various residential sub-groups. In an attempt to provide complete information, SoCalGas has provided the monthly averages for 2010 – 2014 along with a 5-year average for each month which is equivalent to the information provided in testimony.

**a.**  The residential class average monthly consumption is found on the “Res Bill” tab. For determination of number of residential customers billed greater or less than the average please see the attached spreadsheet.

**b.** The residential single family average monthly consumption is found on the “Res Bill” tab. For determination of number of residential single family customers billed greater or less than the average please see the attached spreadsheet.

**c.** The residential multi-family average monthly consumption is found on the “Res Bill” tab. For determination of number of residential multi-family customers billed greater or less than the average please see the attached spreadsheet.

**d.** The residential CARE average monthly consumption is found on the “Res Bill” tab. For determination of number of residential CARE customers billed greater or less than the average please see the attached spreadsheet.



**QUESTION 8:**

For SDG&E:

a. For the monthly residential class average consumption (in therms) from the table at page 87 of 94 in the workpapers, in each of those months, please state the number of residential customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

b. For the monthly residential single family average consumption (in therms) from the table at page 87 of 94 in the workpapers, in each of those months, please state the number of residential single family customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

c. For the monthly residential multifamily average consumption (in therms) from the table at page 88 of 94 in the workpapers, in each of those months, please state the number of residential multifamily customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

d. For the monthly residential CARE average consumption (in therms) from the table at page 88 of 94 in the workpapers, in each of those months, please state the number of residential CARE customers who were billed for amounts greater than the average, and the number of residential customers who were billed for amounts less than the average.

**RESPONSE 8:**

SDG&E uses a 5-year rolling average in determining the average monthly consumption for the various residential sub-groups. In an attempt to provide complete information, SDG&E has provided the monthly averages for 2010 – 2014 along with a 5-year average for each month which is equivalent to the information provided in testimony. Please see the attached Excel file for Responses 8.a-8.d.



**QUESTION 9:**

For SDG&E and SoCalGas:

a. What is the residential class median consumption (in therms) for each month?

b. What is the residential single family median consumption (in therms) for each month?

c. What is the residential multifamily median consumption (in therms) for each month?

d. What is the residential CARE median consumption (in therms) for each month?

**RESPONSE 9:**

SoCalGas and SDG&E use a 5-year rolling average in determining the average monthly consumption for the various residential sub-groups. In an attempt to provide complete information, SoCalGas and SDG&E have provided the monthly averages for 2010 – 2014 along with a 5-year average for each month which is equivalent to the information provided in testimony. See the attached Excel files for Responses 9.a – 9.d.

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**QUESTION 10:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E for its internal decision-making purposes regarding the proposed residential customer charge.

**RESPONSE 10:**

See attached.



**QUESTION 11:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E regarding customer acceptance of the proposed residential customer charge.

**RESPONSE 11:**

SoCalGas and SDG&E do not have any responsive documents.

**QUESTION 12:**

Please provide a copy of all analyses, reports, or other documents prepared by or on behalf of SoCalGas or SDG&E regarding education and outreach plans for the proposed residential customer charge.

**RESPONSE 12:**

SoCalGas and SDG&E do not have any responsive documents.

**QUESTION 13:**

Has either SoCalGas or SDG&E performed any analysis of the impact of the proposed customer charge increase on usage conservation, other than the material included in its prepared testimony and workpapers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the impact of the proposed customer charge increase on usage conservation.

**RESPONSE 13:**

No.

**QUESTION 14:**

Has either SoCalGas or SDG&E performed any analysis of the bill impacts of the proposed customer charge, other than the material included in its prepared testimony and workpapers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the bill impacts of the proposed customer charge increase.

**RESPONSE 14:**

No.

**QUESTION 15:**

Has either SoCalGas or SDG&E performed any analysis of whether there is any correlation of household income and gas consumption for its residential customers? If so, please provide a copy of all analyses, reports, or other documents prepared by or on behalf of the utility regarding the analysis of whether there is any correlation of household income and gas consumption for its residential customers.

**RESPONSE 15:**

No.

**QUESTION 16:**

For each utility, please identify by name and job title each person or persons responsible for:

a. Deciding to propose either the customer charge increase (for SoCalGas) or establishment (for SDG&E) in this proceeding;

b. Deciding the level of customer charge to ultimately propose in this proceeding;

c. Providing the highest level of management review and approval for both the customer charge proposals in this proceeding; and

d. Determining whether the utilities had presented a sufficiently-supported showing in direct testimony and workpapers in support of the customer charge proposals.

**RESPONSE 16:**

1. Mr. Bonnett made the proposal, and it was approved by a TCAP steering committee that includes SoCalGas and SDG&E officers.
* Jimmie Cho – Senior Vice President, Gas Operations & System Integrity
* Rodger Schwecke – Vice President, Customer Solutions
* Gillian Wright – Vice President, Customer Services
* Bruce Folkmann – Vice President, Controller & CFO
* Sharon Tomkins – Vice President & General Counsel
* Scott Furgerson – Vice President, Gas Operations
* Paul Goldstein – Vice President, Gas Acquisition
* Caroline Winn – Chief Energy Delivery Officer for SDG&E
1. See response to 16.a.
2. See response to 16.a.
3. See response to 16.a.