APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
AND SAN DIEGO GAS & ELECTRIC COMPANY
FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES
EFFECTIVE JANUARY 1, 2017 IN THEIR
TRIENNIAL COST ALLOCATION PROCEEDING - PHASE 2

(A.15-07-014)

(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-1:

G-NGV tariffs for each utility under Special Condition 5 read: "All gas used for NGVs, with the exception of NGV home refueling, is required to be under Schedule No. G-NGV."

a. Why has SoCalGas/SDG&E restricted non-residential refueling to Schedule G-NGV?

b. Is Schedule G-NGV considered a core or a noncore schedule?

c. During what month for the years 2010-2015 did each of the core class, noncore class, Schedule G-F3D load and Schedule G-NGV load exhibit their peak loads?

d. What was the peak daily usage for each year from 2010-15 for each of the core class, noncore class, Schedule G-F3D load and Schedule G-NGV load?

e. What was the average daily usage for each year from 2010-15 for each of the core class, noncore class, Schedule G-F3D load and Schedule G-NGV load?

f. For each of the core, noncore, Schedule G-F3D and Schedule G-NGV, specify the variation between forecast annual load, as forecast in the 2013 TCAP, and the actual load for 2014 and 2015.

g. Has SoCalGas/SDG&E considered permitting non-residential NGV transportation on noncore schedules?

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RESPONSE 01-1:

a. Schedule G-NGV is the appropriate schedule for NGV refueling. Special Condition 5 makes an exception for residential NGV customers who refuel their vehicle at home.

b. Schedule G-NGV is considered a Core rate.

c. Please see the table below:

	Month of Calendar Year When Peak Day Load Occurred			
Year	Core Class	Noncore Class (Retail Only)	"G-F3D" Rate	G-NGV Rate 1/
2010	December	August	September	March
2011	January	August	September	March
2012	December	August	October	October
2013	January	August	September	October
2014	December	September	September	October
2015	December	September	September	October
Notes:				
1/	Meters are read on a calendar month basis, once monthly.			

Data is for SoCalGas; please note that the NGV metering is done on a calendar month basis where meters are read once a month and the month identified is the calendar month of peak monthly gas load.

d. Please see the table below:

	Consumption on Day of Peak Usage			
Year	Core Class (MMcf)	Noncore Class (Retail Only) (MDth)	"G-F3D" Rate (MDth)	G-NGV Rate 1/ (MDth)
2010	2,317	2,310	361	#N/A
2011	2,270	1,899	298	#N/A
2012	2,171	2,301	294	#N/A
2013	2,744	2,424	352	#N/A
2014	2,302	2,373	344	#N/A
2015	2,236	2,471	340	#N/A
Notes:				
1/	Meters are read on a calendar month basis, once monthly.			

Data is for SoCalGas; please note that the NGV metering is done on a calendar month basis where meters are read once, hence there is no metered peak day load and the peak day values are shown as "#N/A".

Daily load data for the Core Class is from our Measurement Collection System (MCS); daily values of core load are inferred from daily metered information on Send Out and Noncore load. Daily Core load is calculated from the equation:

Core Load = Send Out – Noncore Load,

Where Send Out and Noncore load are daily metered values. The logical definition of Core Load computed from this equation and data is that Core Load includes gas delivered to Core customers plus Company Use Fuel plus Un-Accounted-For gas. Also, since the units for Send Out and Noncore Load in the MCS data are volumetric (rather than energy units), the units of the resulting Core Load are also volumetric.

e. Please see the table below:

	Average Daily Usage by Year			
Year	Core Class (MMcf)	Noncore Class (Retail Only) (MDth)	"G-F3D" Rate (MDth)	G-NGV Rate (MDth)
2010	1,001	1,196	160	27
2011	1,039	1,160	208	28
2012	980	1,372	211	30
2013	993	1,343	221	32
2014	855	1,380	223	34
2015	865	1,299	222	36

Data is for SoCalGas.

f. Please see the table below:

	***Difference* (Forecast less Recorded) for Annual load, as forecast in the 2013 TCAP, and as Compiled for this Data Request from Recorded Data**			
Year	Core Class (Bcf)	Noncore Class (Retail Only) (MMDth)	"G-F3D" Rate (MMDth)	G-NGV Rate (MMDth)
2014	37	-33	#N/A	-1
2015	32	-6	#N/A	-1

Data is for SoCalGas. Note that the data from the 2013 TCAP forecast for the Core Class was calculated to be comparable to the recorded data used to represent the Core Class as noted in d) above. Also, we did not prepare a forecast for the "G-F3D" rate category; hence a forecast is not available.

g. No, SoCalGas and SDG&E have not proposed NGV transportation non-core schedules in prior regulatory proceedings.

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QUESTION 01-2:

Schedule G-NGV confers on customers a curtailment priority 1 or 2A. For each alternative schedule available to non-residential NGV station customers, please respond to the following questions.

a. What are the forecast daily delivery volumes in an average temperature year to customers served under the schedule?

b. Specify the number of curtailment events under the schedule recorded over the past fifteen (15) years.

c. For each event identified in response to Question 01-2b, please specify the underlying reason for the curtailment (*e.g.*, capacity constraint, supply shortage, planned maintenance, emergency).

RESPONSE 01-2:

a. Please see Mr. Wetzel's work papers, available at https://www.sdge.com/sites/default/files/regulatory/Wetzel%20Workpapers%20A1507014.pdf, p.18 & 19, col-K of the ".pdf" file, for rate group G-NGV for the monthly throughput in MTh (i.e. 1000 Therms). To get the average daily value divide the specific month-year of the gas demand by the respective month-year's number of calendar days.
b. Zero.
c. N/A.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-3:

Schedule GT-F3D provides firm intrastate transportation to commercial and industrial customers (GT-F3D). Please respond to the following questions regarding service under this rate schedule.

a. What are the forecast daily delivery volumes in an average temperature year to customers served under this schedule?

b. Specify the number of curtailment events under the schedule recorded over the past fifteen (15) years.

c. For each curtailment event identified in response to Question 01-3b, please provide:

i. The date and duration of the curtailment.

ii. The underlying cause for the curtailment (*e.g.*, capacity constraint, supply shortage, planned maintenance, emergency).

iii. The daily volumes curtailed.

d. Under average temperature year weather conditions, how many millions of cubic feet a day of deliveries would be curtailed before service to any GT-F3D customer is curtailed? If the answer to this question will be affected if SoCalGas' proposed changes to Rule 23 (A.15-06-020) are approved, how would the answer to the previous question change?

e. Under cold-year weather conditions, how many millions of cubic feet a day of deliveries would be curtailed before service to any GT-F3D customer is curtailed? If the answer to this question will be affected if SoCalGas' proposed changes to Rule 23 (A.15-06-020) are approved, how would the answer to the previous question change?

f. Does the size of this curtailment cushion under average and cold year weather conditions normally change from month to month or seasonally during the year? What is the range or ranges of this variation measured in millions of cubic per day?

g. On a peak Winter day when the least amount of unutilized system delivery capacity is typically available, how many millions of cubic feet a day are available to be curtailed before service is curtailed to any GT-F3D customers? If the answer to this question will be affected if

SoCalGas' proposed changes to Rule 23 (A.15-06-020) are approved, how would the answer to the previous question change?

h. If the volumes stored and the withdrawal capacity at the Aliso Canyon storage field are reduced by 25 percent from pre-incident withdrawal season levels and withdrawal capacity, will this increase the risk of curtailment to GT-F3D customers? If so, to what extent and why?

RESPONSE 01-3:

a. SoCalGas did not prepare a forecast for this specific rate schedule (GT-F3D); however, SoCalGas did provide a forecast of the G-30, Distribution segment (denote this group as "G-30 (Dist)" for this data request response) of the overall G-30 rate group. Please see Mr. Wetzel's workpapers, p.18 & 19, col-N of the ".pdf" file, for rate group G-30 (Dist) for the monthly throughput in MTh (i.e. 1000 Therms). To get the average daily value divide the specific month-year of the gas demand by the respective month-year's number of calendar days.

b. See attached spreadsheet.

Last 15 yrs of Curtailments list.xlsx

c. See Response 01-3.b.
d. The need to call a curtailment is dependent on many factors, which include supply, demand, weather, system and local capacity, amount of line pack, and operating pressure. It is not possible to guess how much volume would be curtailed under average temperature year weather conditions. If SoCalGas' proposed changes to Rule 23 were approved, then the volume curtailed ahead of GT-F3D customers would be up to 60% of the volume being consumed by electric generators at the time of the curtailment event.

e. See Response 01-3.d.

f. Based on contracted quantities, the size of the Interruptible load varies by 18 percent month to month and is 4 percent higher in the winter vs summer months.

g. See Response 01-3.d.

h. A 25% reduction in Aliso withdrawal capacity could increase the risk of curtailment to GT-F3D customers. The extent of such increased risk would depend upon customer load and system operating conditions.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-4:

a. Please specify all categories of costs (*e.g.*, G&A, storage, local transmission, distribution) allocated to the Sempra-wide uncompressed transmission charge rate under Schedule G-NGV and specify the cost allocation factor for each cost category.

b. Please specify all categories of costs (*e.g.*, G&A, storage, local transmission, distribution) allocated to the SDG&E uncompressed transmission charge under Schedule G-NGV, prior to the Sempra-wide rate calculation, and specify the cost allocation factor for each cost category.

c. Please specify all categories of costs (*e.g.*, G&A, storage, local transmission, distribution) allocated to the SoCalGas uncompressed transmission charge under Schedule G-NGV, prior to the Sempra-wide rate calculation, and specify the cost allocation factor for each cost category.

d. Please state the forecast annual throughput used in developing the proposed G-NGV rates for each of SDG&E and SoCalGas.

e. Please identify and explain any differences in cost categories or allocation methodologies in developing the utility-specific rate uncompressed transmission charge before calculating the Sempra-wide rate.

f. Please identify all categories of costs allocated to the compression surcharge for utility-funded public access stations, specify the cost allocation factor for each cost category. Identify the level of cost forecast for each identified category.

RESPONSE 01-4:

a. Generally, the cost categories are broken down amongst base margin, regulatory accounts, and other operating costs. However, within each general category exists multiple cost components. The information requested is found on the "Cost Alloc" tab of the SoCalGas and SDG&E rate design models.

b. See Response 01-4.a.

c. See Response 01-4.a.

d. The proposed annual throughput is found in the demand forecast testimony of Ms. Payan. The information is also found on Table 1 of the Rate Tables tab in Mr. Bonnett's workpapers, which is 157,095 Mth/yr for SoCalGas and 18,501 Mth/yr for SDG&E.

e. There are no differences in cost categories or allocation methodology between SoCalGas and SDG&E.

f. The general categories as found on the Compression Rate Adder model for both SoCalGas and SDG&E are: ratebase, capital related revenue requirement, and customer related O&M. All of these costs are totaled to an Effective Station Revenue Requirement which is then used to calculate the compression rate adder for each utility.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-5:

Mr. Bonnett provides in Table 1 on page 2 of his Revised Prepared Direct Testimony dated November 19, 2015 that the "class average" SoCalGas uncompressed G-NGV rate on January 1, 2015 was 13.0 cents a therm. His TCAP testimony, also in Table 1, page 2, proposes that the uncompressed "class average" G-NGV rate on January 1, 2017 be 7.7 cents a therm, a reduction of 5.3 cents a therm.

a. What is the actual class-average uncompressed transmission charge under SoCalGas G-NGV rate effective January 1, 2015?

b. To the extent the actual, effective rate is not 13 cents/th, please identify and quantify all changes in costs that contribute to the difference between the 13 cents/th rate identified by Mr. Bonnett and the actual effective rate. Please explain how the current amortization of the CFCA balance, effective January 1, 2015, affects your response.

c. Please identify and quantify the changes in cost, cost allocation or throughput forecast underlying the 5.3 cents/th forecast reduction (13 to 7.7 cents/th) in the G-NGV rate for January 1, 2017. Please explain how the current amortization of the CFCA balance, as proposed by SoCalGas in Advice Letter 4877, affects your response.

d. For each change identified in response to Question 01-5b and c, please identify the proceeding or Advice Letter that authorized the change and the date when the change was implemented.

e. Specify the forecast NGV throughput underlying the forecast January 1, 2017 Sempra-wide uncompressed transmission charge.

f. Please explain the methodology for calculating the "class average" rate for each of SoCalGas and SDG&E. Are all costs identified in response to Question 01-4 included in the calculation? If not, please identify the cost category and level.

g. Please explain the methodology for calculating the Sempra-wide rate and specify any differences in the development of the Sempra-wide rate for SoCalGas and SDG&E. Please identify the location of the workpaper showing the calculation of the Sempra-wide NGV rate.

h. What was the SoCalGas uncompressed transmission charge for G-NGV before the adjustment to create a Sempra-wide rate?

i. What was the SDG&E uncompressed transmission charge for G-NGV before the adjustment to create a Sempra-wide rate?

RESPONSE 01-5:

a. The uncompressed tariff rate shown on schedule G-NGV for January 2015 was $0.12992 per therm.

b. N/A

c. The table below shows the impact of the various changes to the NGV uncompressed rate. In addition, the CFCA amortization from advice letter 4877 should not have an impact on the proposed 2017 rates because, as is discussed in more detail in response to Q.11b below, if actual core throughput equals authorized core throughput in 2016, the under-collection in rates today would be recovered in 2016 and the CFCA balance would be projected at $0 for December 31, 2016.

SCG	2015 Rate	Cost Allocation	Demand	Costs	2017 Proposed Rate
NGV Rate	$0.12992	$0.00206	-$0.01063	-$0.04441	$0.07694

d. Each change identified for the response in c., above is a proposal in the current proceeding. As such, there are no authorized changes at this point in time.

e. The requested information is found on page 4 of Ms. Payan's prepared direct testimony.

f. The "class average" NGV rate found in Appendix A of Mr. Bonnett's testimony for both SoCalGas and SDG&E are calculated on Table 1, line 7 as follows:

Revenues / Therms = Class Average rate

Yes, all costs allocated to the NGV class are included in this calculation.

g. The Commission-approved methodology for calculation of the NGV Sempra-wide rate is found in Mr. Bonnett's SoCalGas workpapers at page 106 of 178.

h. As shown in Mr. Bonnett's SoCalGas workpapers at page 105 of 178, the uncompressed NGV rate was $0.08012.

i. As shown in Mr. Bonnett's SDG&E workpapers at page 105 of 178, the uncompressed NGV rate was $0.02906.

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QUESTION 01-6:

In Table 2 on page 3 of his testimony, Mr. Bonnett shows SDG&E's "class average" G-NGV uncompressed transportation charge rate declining from 13.2 cents a therm on January 1, 2015 to 7.6 cents a therm on January 1, 2017.

a. What is the actual class-average uncompressed transmission charge under SDG&E Schedule G-NGV effective January 1, 2015?

b. To the extent the actual, effective rate is not 13.2 cents/th, please identify and quantify all changes in costs that contribute to the difference between the 13 cents/th rate identified by Mr. Bonnett and the actual effective rate.

c. Please identify and quantify the changes in cost, cost allocation or throughput forecast underlying the 5.6 cents/th forecast reduction (13.2 to 7.7 cents/th) in the G-NGV rate for January 1, 2017.

d. For each change identified in response to Question 01-6b and c, please identify the proceeding or Advice Letter that authorized the change and the date when the change was implemented.

e. Specify the forecast NGV throughput underlying the proposed forecast January 1, 2017 Sempra-wide uncompressed transmission charge.

RESPONSE 01-6:

a. The uncompressed tariff rate shown on schedule G-NGV for January 2015 was $0.13227 per therm.

b. N/A

c. The table below shows the impact of the various changes to the NGV uncompressed rate.

SDG&E	2015 Rate	Cost Allocation	Demand	Costs	2017 Proposed Rate
NGV Rate	$0.13227	$0.00208	-$0.01077	-$0.04732	$0.07626

d. Each change identified for the response in c., above is a proposal in the current proceeding. As such, there are no authorized changes at this point in time.

e. The requested information is found on page 8 of Ms. Payan's testimony.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-7:

Mr. Bonnett's revised direct testimony, in Appendix A, Table 1 shows that the proposed uncompressed G-NGV rate for SoCalGas on January 1, 2017 will be 9.159 cents a therm and that the uncompressed NGV rate on January 1, 2015 was 14.23 cents a therm.

a. Please explain the apparent discrepancy between a 7.7 cents a therm "class average" NGV rate and the 9.159 cents a therm SoCalGas "Proposed" NGV rate.

b. Please explain the discrepancy between the 13.0 cents a therm "class average" SoCalGas NGV rate claimed to be effective on January 1, 2015 in Table 1, on page 2 of Mr. Bonnett's testimony and the 14.23 cents a therm rate he cites for January 1, 2015 in Appendix A, Table 1 of his testimony.

c. Do the 7.7 and 9.159 cents a therm rates for SoCalGas include the rate effect of revenues collected from monthly customer charges or are they just volumetric transportation rates?

d. If one or both of these rates are average rates, please identify the volumetric transportation rates that are embedded in them.

RESPONSE 01-7:

a. There is no discrepancy as they represent different rates. The 7.7 cents/therm found on Table 1 of Mr. Bonnett's testimony is referring to an uncompressed post –Sempra-Wide-adjustment rate, whereas the 9.159 cents/therm found in Appendix A, Table 1 of the SoCalGas rate tables is referring to an illustrative "NGV – Post SempraWide" class-average rate which includes the compression revenues.

b. See Response 01-7.a.

c. The 7.7 cents is the uncompressed rate and only includes uncompressed revenues whereas the 9.159 cents is a class average rate and therefore, includes compression and customer charge revenue.

d. The 9.159 is a class-average rate and includes the uncompressed and compression revenue.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-8:

Mr. Bonnett's revised direct testimony, Table 2 on page 3, states that the proposed uncompressed "class average" G-NGV rate for SDG&E on January 1, 2017 is 7.6 cents a therm and that the NGV class average rate for SDG&E on January 1, 2015 was 13.2 cents a therm. In Appendix A, Table 1 (for SDG&E) of his testimony, he shows that the proposed uncompressed G-NGV rate for SDG&E on January 1, 2017 will be 11.837 cents a therm and that the uncompressed NGV rate on January 1, 2015 was 15.304 cents a therm.

a. Please explain the apparent discrepancies between the two sets of rates.

b. Do the 7.6 and 11.837 cents a therm rates for SDG&E include the rate effect of revenues collected from monthly customer charges or are they just volumetric transportation rates?

c. If one or both of these rates are average rates, please identify the volumetric transportation rates that are embedded in them.

d. In light of the apparent discrepancies listed above, what are the average and volumetric uncompressed G-NGV transportation rates that SoCalGas and SDG&E are proposing to implement on January 1, 2017?

RESPONSE 01-8:

a. As discussed in Response 01-7a., these are two different rates. The rate discussed in Table 2 of Mr. Bonnett's testimony is the NGV uncompressed rate whereas the rate shown in the Appendix is the class-average NGV post Sempra-wide rate.

b. The 7.6 cent rate is the uncompressed rate and only includes uncompressed revenues whereas the 11.837 cent rate includes compression and customer charge revenue.

c. The 11.837 cent rate is the NGV post Sempra-wide class average rate and includes both uncompressed and compressed volume revenues.

d. As discussed above there is no discrepancy as the rates being compared are two different rates. That being said, the NGV uncompressed rate that is being proposed for SoCalGas and SDG&E are $0.077 and $0.076, respectively.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-9:

Since SoCalGas and SDG&E started implementing Sempra-wide NGV rates, SDG&E's rates have only been slightly higher than the SoCalGas' rate. For example, Tables 1 and 2 of Mr. Bonnett's testimony show a January 1, 2015 "class average" rate for SoCalGas of 13.0 cents a therm while SDG&E's "class average" rate was 13.2 cents a therm, a difference of 0.2 cents a therm.

a. Please explain the difference between SoCalGas' proposed 9.159 cents a therm rate on January 1, 2017 and SDG&E's comparable proposed rate of 11.837 cents a therm as shown in Appendix A, Tables 1 for each of SoCalGas and SDG&E. The proposed NGV rate for SDG&E is 2.678 cents a therm higher than the comparable proposed rate for SoCalGas.

b. Please identify each factor that contributed to the increase in this differential and the amount each factor contributed to the 2.678 cents a therm increase.

RESPONSE 01-9:

a. Again, the question is comparing two different rates. The rates discussed in Tables 1 and 2 of Mr. Bonnett's testimony are the uncompressed rate for the two utilities, whereas the rates shown in Appendix A are the NGV class average rate for SoCalGas and SDG&E. In response, the historical relationship noted in the question will continue in this TCAP. For example, the question noted that the 1/1/2015 uncompressed rate shown in Tables 1 and 2 of Mr. Bonnett's testimony are $0.130 and $0.132 for SoCalGas and SDG&E, respectively. For 2017, the uncompressed rate will be $0.077 and $0.076 for SoCalGas and SDG&E, respectively. Thus, there is no change in the relationship between the figures.

b. As discussed above, the question was comparing two different rates and the ratio comparing the uncompressed rate will actually be $0.01 per therm which is consistent with the historical trend.

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QUESTION 01-10:

a. Is it SoCalGas' and SDG&E's policy that a rate surcharge or credit to amortize a balancing account imbalance allocated to a particular customer segment is removed from the tariffed total rate when the imbalance is reduced to zero?

b. In SoCalGas' Advice Letter 4550 dated October 15, 2013, Attachment B proposes an increase in the G-NGV rate on January 1, 2014 to 9.743 cents a therm, an increase of 2.049 cents a therm from the "Present Rate" of 7.694 cents a therm on September 1, 2013, resulting from the amortization of an estimated core market balancing account under-collection of $20.4 million.

i. When was this particular under-collection fully amortized?

ii. Was the G-NGV reduced by 2.049 cents a therm immediately following the full amortization?

iii. If not, why not?

iv. Please identify the proceeding or Advice Letter through which this reduction, if it was made, was implemented and as of what date.

RESPONSE 01-10:

a. As background, in general, SoCalGas and SDG&E amortize their regulatory account balances in rates on an annual basis. This is accomplished through filing an Annual Regulatory Account Balance Update Advice Letter (AL). As part of this filing, SoCalGas and SDG&E project year-end balances for their regulatory accounts for inclusion in the subsequent year's rates with the regulatory account balances being amortized in current rates being removed.

   The increase in the G-NGV rate that results from amortization of SoCalGas' regulatory account balances is primarily due to the projected undercollected balance for its Core Fixed Cost Account (CFCA). As such, this response will focus on that particular account. In Attachment C of AL 4550, SoCalGas proposed to amortize an undercollected CFCA balance of $48.9 million in core transportation rates effective January 1, 2014. If actual core throughput equaled authorized core throughput for 2014, the $48.9 million undercollection would be recovered in 2014 and the CFCA

balance would be projected at $0[1] for December 31, 2014. Based on this, core transportation rates would decrease by $48.9 million effective January 1, 2015. However, if actual throughput was less than authorized core throughput, then the $48.9 million would not be fully recovered in 2014 and the shortfall would be carried over for recovery in the subsequent year's rates. This was the case for 2014. During the year, actual core throughput was lower than authorized core throughput, so SoCalGas did not fully recover the $48.9 million undercollection. The shortfall, approximately $5 million, was carried over to the subsequent year for recovery in 2015 rates.

b. Based on the example described above, the G-NGV rate effective January 1, 2015 would have decreased by the net amount of $43.9 million as the $48.9 million was removed from current rates and replaced with the $5 million shortfall for recovery in 2015 rates. Commission approved updates to rates including the G-NGV rate based on projected year-end balances for SoCalGas' regulatory accounts are included in SoCalGas' annual Consolidated Year-end Rate Update AL effective January 1 of the following year. Based on the example described above, the CFCA balance was updated in AL 4700 and made effective in 2015 rates through AL 4730 dated December 26, 2014.

[1] Includes the assumption that unaccounted for gas and other costs recorded in the CFCA equal the authorized cost in rates.

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(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-11:

a.In SoCalGas' Advice Letter 4700 dated October 15, 2014, Attachment A proposes an increase in the G-NGV rate on January 1, 2015 to 12.711 cents a therm, an increase of 2.103 cents a therm from the "Present Rate" of 10.608 cents a therm on July 1, 2014, resulting from the amortization of an estimated core market balancing account under-collection of $85.8 million.

i. When was this particular under-collection fully amortized?

ii. Was the G-NGV rate at that time reduced by 2.103 cents a therm?

iii. If not, why not?

iv. Please identify the proceeding or Advice Letter through which this reduction, if it was made, was implemented and as of what date.

b. In SoCalGas' Advice Letter 4877 dated October 15, 2015, Attachment A proposes an increase in the G-NGV rate on January 1, 2016 to 21.774 cents a therm, an increase of 7.474 cents a therm from the "Present Rate" of 14.3 cents a therm on August 1, 2015, resulting from the amortization of an estimated core market balancing account under-collection of $213.9 million.

i. When this under-collection is fully amortized, will the uncompressed NGV rate be reduced by 7.474 cents a therm?

ii. If not, why not?

c. If SoCalGas and SDG&E are unable to fully amortize a core balancing account imbalance in the following year (whether due to a disparity between the forecast and actual imbalance or the throughput forecast) are they authorized to collect or distribute the remaining imbalance in the next following year or a subsequent following year? Please explain.

d. What differences in under-collection or over-collection amortization practices of the two utilities exist, or are proposed in the TCAP to be put in place for each utility?

e. When preparing the annual regulatory account update Advice Letters, do SoCalGas and SDG&E calculate the per therm surcharges or credits to be allocated to customer segments to amortize under- and over-collections based on the throughput forecast for each customer segment that was adopted in the most recently adopted TCAP decision? If not, please state the basis for the throughput forecast used in the annual regulatory account update.

f. If the assumed throughput that was used to allocate the under-collection to the rates of different customer segments is exceeded during the planned under-collection recovery calendar year, and the amortization charge is collected for the actual throughput, the under-collection will be more than fully recovered.

i. Is this particular over-recovery returned to customers?

ii. If so, how, when and in what way?

RESPONSE 01-11:

a. The increase in the G-NGV rate that results from amortization of SoCalGas' regulatory account balances is primarily due to the projected under-collected balance for its Core Fixed Cost Account (CFCA). As such, this response will focus on that particular account. In Attachment B of AL 4700, SoCalGas proposed to amortize an under-collected CFCA balance of $126.8 million in core transportation rates effective January 1, 2015. If actual core throughput equaled authorized core throughput for 2015, the $126.8 million under-collection would be recovered in 2015 and the CFCA balance would be projected at $0[1] for December 31, 2015. Based on this, core transportation rates would decrease by $126.8 million effective January 1, 2016. However, if actual throughput was less than authorized core throughput, then the $126.8 million would not be fully recovered in 2015 and the shortfall would be carried over for recovery in the subsequent year's rates. Similar to 2014, actual core throughput was lower than authorized core throughput for 2015, so SoCalGas did not fully recover the $126.8 million under-collection. The shortfall, approximately $9 million, was carried over to the subsequent year for recovery in 2016 rates.

   Based on the example of the CFCA as described above, the G-NGV rate effective January 1, 2016 would have decreased by the net amount of $115.8 million as the $126.8 million was removed from current rates and replaced with the $9 million shortfall for recovery in 2016 rates. Commission approved updates to rates including the G-NGV rate based on projected year-end balances for SoCalGas' regulatory

accounts are included in SoCalGas' annual Consolidated Year-end Rate Update AL effective January 1 of the following year. Based on the example described above, the CFCA balance was updated in AL 4877 and made effective in 2016 rates through AL 4910 dated December 29, 2015.

b. The increase in the G-NGV rate that results from amortization of SoCalGas' regulatory account balances is primarily due to the projected under-collected balance for its CFCA. As such, this response will focus on that particular account. In Attachment B of AL 4877, SoCalGas proposed to amortize an under-collected CFCA balance of $424.4 million in core transportation rates effective January 1, 2016. If actual core throughput equaled authorized core throughput for 2016, the $424.4 million under-collection would be recovered in 2016 and the CFCA balance would be projected at $0[1] for December 31, 2016. Based on this, core transportation rates would decrease by $424.4 million effective January 1, 2017. However, if actual throughput is less than authorized core throughput, then the $424.4 million would not be fully recovered in 2016 and the shortfall would be carried over for recovery in the subsequent year's rates.

c. Yes. On an annual basis, the SoCalGas and SDG&E comply with the longstanding practice of submitting an annual advice letter updating their revenue requirement for projected year-end regulatory account balances for incorporation into rates effective January 1 of the subsequent year. Any differences between the projected year-end regulatory account balances and the actual recorded balances at December 31 remain unamortized during the subsequent year. SoCalGas and SDG&E wait until the following year's advice letter filing to incorporate any unamortized differences into rates in the year after that advice letter filing.

d. Currently, the disposition of the over- or under-collected balances are aligned for the Utilities and balances are addressed as explained in answer 01-11.c, above. However, the TCAP is proposing a new mechanism for each utility that would allow a true-up of the unamortized CFCA balance from the prior year to align rates with actual year-end results.

SDG&E proposes to institute a mechanism that would allow a true-up of the additional unamortized over- or under-collection that remains in CFCA at the end of each year. SDG&E proposes the following accounting mechanism to determine whether a true-up of rates should be made for the unamortized portion of the CFCA balance: SDG&E will total the authorized margin recorded in the CFCA for the last four months of the year and compare 15% of the total amount to the absolute value of the unamortized portion of the CFCA balance. In the event that the CFCA unamortized balance exceeded the 15% threshold, SDG&E would file a Tier 2 AL by February 28 of the following year to

propose a rate change to amortize the additional balance in rates over the remaining nine months of the year, effective April 1.

SoCalGas is proposing a similar mechanism but proposes a 10% threshold.

e. Yes. Both SoCalGas and SDG&E use the throughput forecast approved by the Commission in the most recent TCAP.

f. See response to 01-11.C.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES EFFECTIVE JANUARY 1, 2017 IN THEIR TRIENNIAL COST ALLOCATION PROCEEDING - PHASE 2

(A.15-07-014)

(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-12:

a. In its Annual Regulatory Account Updates, what methodology does SoCalGas use to allocate among customer segments "Total Core" regulatory balancing account under- and over-collections?

b. In its Annual Regulatory Account Updates, what methodology does SDG&E use to allocate among customer segments "Total Core" regulatory account under- and over-collections?

c. If the allocation methodology is equal cents per therm (ECPT), why didn't the average change between "Present" and "Proposed" rates, shown in SoCalGas' Advice Letter 4877, Attachment A, for the "Total Core" market of an increase of 6.188 cents a therm also be the change in rates for all of the customer segments shown in the Table, thus reflecting an equal cents per therm allocation? In contrast, the rate increase shown for NGV customers was 7.474 cents a therm.

d. SDG&E's Advice Letter 2428-G addressing rate changes resulting from the amortization of regulatory balancing account imbalances proposed an average increase in the rates for core customers of 4.763 cents a therm when the increase for NGV customers was 8.336 cents a therm. If the allocation methodology employed is ECPT, why wasn't the proposed increase for SDG&E's NGV customers 4.763 cents a therm?

e. Has SoCalGas or SDG&E considered allocating under-collections or over-collections resulting from weather and forecast-error related throughput variations directly in proportion to the deviations between forecast and actual for each segment (*e.g.*, residential core, NGV) or schedule?

f. Since uncompressed NGV load is not weather sensitive, wouldn't it be more equitable for such NGV customers to accrue regulatory balancing account under-or over-collections based only on the difference between forecast throughput and revenue recovery and actual throughput and revenue recovery of those NGV customers? Such an approach would also be consistent with the rate design principle, referred to above, that utility costs should be borne by those customers that have caused the costs to be incurred.

i. Would SoCalGas and SDG&E support such an approach?

ii. If not, why not?

g. In the TCAP testimony is there any testimony that addresses the same issues for SoCalGas as are addressed in the testimony for SDG&E of Ms. Niederle (*i.e.*, regarding proposed changes in how SDG&E's regulatory balancing accounts are handled)?

RESPONSE 01-12:

a. The amortizations of the various regulatory accounts are approved by the Commission and can vary depending on which regulatory account is being discussed. There are some regulatory accounts that are only allocated to certain rate classes (e.g., core customers, non-core customers, etc.). For example, the Core Fixed Cost Account (CFCA) is allocated on an Equal Cent Per Therm (ECPT) methodology. It doesn't matter whether the account is over- or under-collected, the ECPT method is used in all cases.

b. See response to 01-12.a.

c. The "Total Core" line referenced in the question is not an actual rate class but rather is a calculated number based on the sum of revenues divided by the demand throughput of the core customer classes approved in the most recent TCAP. The various regulatory accounts allocated revenue to the specific customer classes and that revenue can change amongst the regulatory accounts.

d. See response to 01-12.c.

e. No.

f. SoCalGas and SDG&E's proposal is to continue with the current Commission approved allocation method and do not have a position on the discussed approach.

g. Yes, please see the Prepared Direct Testimony of Mr. Ahmed.

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(A.15-07-014)

(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-13:

Mr. Bonnett discusses updating the NGV Compression Rate Adder on page 14 of his revised direct testimony.

a. Please specify all cost categories and their levels included in the Compression Rate Adder.

b. For any cost categories representing common utility costs, please specify the allocation methodology used to allocate the costs to the Compression Rate Adder.

RESPONSE 01-13:

a. The cost categories are shown in Section 2 of Mr. Bonnett's workpapers for both SoCalGas and SDG&E.

b. Operations & Maintenance (O&M) and Electricity expense utilize a per therm factor that is used to calculate the particular revenue requirement to be recovered for each category.

O&M

O&M costs are available only at the aggregate level for SDG&E and SoCalGas, which apply to various labor and non-labor related costs associated with the operations and maintenance of the Companies' facilities. The SoCalGas direct O&M costs consist of various cost elements as follows: Labor (straight- and over-time), Non-Labor (employee costs, purchased labor, materials, services, and misc. non-labor costs). The SoCalGas indirect O&M consists of the following: payroll tax, pension & benefits, workers comp, vacation & sick, P.L.P.D., fixed cost loader, fleet (distribution), shop, small tools, and administrative & general.

Electricity expense

For both SoCalGas and SDG&E, only three individual stations for each Company (total of 6 stations) had individual electric meters that provided annual electricity consumption and cost data. Station total electricity costs are determined by multiplying the electric costs per therm by the throughput of each station in therms. Category average electricity costs (e.g. average electricity costs for all public only usage stations, or all stations that have private only usage, etc.) are taken as a throughput weighted average of $/therm electricity costs for stations in that category.

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(A.15-07-014)

(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-14:

a.Please identify any categories of costs and their levels to be recovered from core or noncore customers that represent an allocation of costs common with the Compression Service Tariff (CST).

b. For each such category, specify the allocation methodology used to allocate costs to CST service.

c. Did SoCalGas use its accounting system or systems to track and record the costs it incurred in developing and securing Commission approval of its CST?

i. If not, why not?

ii. What is the total amount of the costs that SoCalGas incurred in developing and securing Commission approval of its CST? Among others, these costs should include the costs of: concept development; securing internal approval to pursue development and approval of the tariff; drafting and finalizing testimony and workpapers; preparation and securing internal approval of the Application (A-11-11-011); witness preparation for cross-examination; review of the Opening Briefs of parties to the proceeding; preparing, reviewing and securing internal approval of the Reply Briefs SoCalGas submitted in the proceeding; lobbying the Commissioners, the Commissioner Advisors and other Commission staff to secure approval of the CST; preparation of Comments on the ALJ's Proposed Decision; and, preparation of the periodic reports on the program required by D.12-12-037.

iii. For these types of costs, if they were tracked and recorded by SoCalGas' accounting system or systems, please identify the recorded amounts for each such cost type.

iv. If all of these types of costs were not tracked and recorded in SoCalGas' accounting system or systems, please provide estimates of the total amount for each of these types of costs, so that by adding the components, the total cost can be determined.

d.What costs incurred in administering and managing the service provided under the Tariff since it was approved by the Commission have been paid by non-participating customers?

e. Were any of the costs identified in response to Question 01-14c or d allocated to core or noncore customers, either in this TCAP or a prior TCAP?

i. If the answer is yes, please specify the cost categories, the total costs and the allocation methodology.

ii. Have the costs identified in response to Question 01-14c been recovered from core or noncore customers, on a forecast or historical basis, in any prior TCAP.

f. Please provide each of the reports required by D.12-12-037 that have been submitted to date or information about how to find these reports on SoCalGas' website if they are available there.

RESPONSE 01-14:

a. There are no levels of costs to be recovered for the Compression Services Tariff (CST) from core or noncore customers. Per Ordering Paragraph 2 in Decision (D.) 12-12-037, only the tariff customer bears the cost of the services received:

> *Southern California Gas Company shall price the Compression Services Tariff through a service contract that includes cost and rate components, adjustments, performance requirements and payments terms agreed upon in advance by the customer and SoCalGas. SoCalGas shall use well established methodologies identical to those used in general rate cases, to set the price of this service, and the tariff customer bears the cost of the services received.*

b. Per D.12-12-037, CST utilizes the utility's cost of services methodology to calculate the service fee. The service fee is comprised of direct cost of goods or services and indirect charges or overhead. Specific internal orders are created to track all costs associated with individual CST customers. There are also internal orders created that track all costs associated to the general activities of the program. The process identifies and captures any embedded costs that were filed in the general rates. Those embedded costs, recorded in the SAP, will be credit to the rate payers through balancing account. The table below summarizes the type of direct cost activities associated with the tariff. The table is extracted from the testimony prepared by Mr. Edward J. Reyes in Application (A.)11-11-011. [2]

[2] https://www.socalgas.com/regulatory/documents/a-11-11-011/EdReyesTestimony_Chapter3__FINAL_.pdf

Table I

Types of Direct Cost Activities

Activity	Provider	Accounting Method
Customer Outreach	SoCalGas	Direct
Contract Development	SoCalGas	Direct
Engineering and Cost Estimation	Third-party service provider / SoCalGas	Direct
Procurement and Construction	Third-party service provider / SoCalGas	Direct
Engineering Oversight	SoCalGas	Direct
Operation and Maintenance	Third-party service provider / SoCalGas	Direct

The table below summarizes the types of overheads applied to the direct costs. It is to be noted that the percentage shown in the table were the overheads at the time of the filing of A.11-11-011.

Types of Overheads

Overhead	Loading Base	O&M %	Capital %
Labor Overheads:			
1) Payroll Tax	SoCalGas Labor	7.68%	7.68%
2) Incentive Compensation Plan	SoCalGas Labor	29.34%	29.34%
3) Workers' Compensation	SoCalGas Labor	5.65%	5.65%
4) Public Liability and Property	SoCalGas Labor	3.25%	3.25%
5) Pension & Benefits	SoCalGas Labor	50.09%	50.09%
6) Vacation & Sick	SoCalGas Labor	19.79%	19.79%
Total Labor Overheads		**115.80%**	**115.80%**
Non-Labor Overheads:			
7) Purchasing	Total Non-labor	**1.86%**	**1.86%**
8) Administrative & General	Total Direct Costs	**31.21%**	**6.88%**
9) Fixed Cost Loader	Total Direct Costs	**12.76%**	-
Total Labor Overheads Applied	1, 2, 3, 4, 5, 6, 8, 9	**159.77%**	**122.68%**
Total Non-Labor Overheads	7, 8, 9	**45.83%**	**8.74%**

c. No, SoCalGas did not use its accounting system or systems to track and record the costs it incurred in developing and securing Commission approval of its CST.
   i. SoCalGas was not required to track costs incurred for developing and securing Commission approval of its CST. The costs to be tracked were directed in Ordering Paragraph 3 in D.12-12-037:

      The Southern California Gas Company shall establish balancing and tracking accounts to ensure that customers taking service through the Compression Service Tariff bear all costs and risks associated with the provision of the Compression Services Tariff and to ensure thereby that non-participating customers bear none of the costs and risks associated with the Compression Services Tariff.

   ii. None.
   iii. Not applicable.
   iv. SoCalGas is unable to provide estimates of such costs.

d. There are no costs incurred by non-participating customers in administering and managing the service provided under the tariff.

e. Not applicable, as there were no costs identified in the response to Question 01-14c.
   i. Not applicable.
   ii. Not applicable.

f. Attached below are the reports required by D.12-12-037:


1. CST Semi Annual Report _10202014.PI


2. CST Semi Annual Report_04172015.pd


3. CST Amended Report_10302015.pd

Note: An amended file was circulated on October 30, 2015. The legend in Attachment B of the Report was corrected, there were no other changes made to the previous version circulated on October 27, 2015.

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TRIENNIAL COST ALLOCATION PROCEEDING - PHASE 2

(A.15-07-014)

(1ST DATA REQUEST FROM CLEAN ENERGY FUELS CORP.)

QUESTION 01-15:

a. Please specify the number and location, by utility, of new SoCalGas or SDG&E public access NGV refueling stations built since the last TCAP Application was filed.

b. For each station identified in response to Question 01-15a, please identify the capital investment made by SoCalGas or SDG&E and the fully allocated station cost.

c. Please specify the number and location, by utility, of existing SoCalGas or SDG&E public access NGV refueling stations modified or upgraded since the last TCAP Application was filed.

d. For each station identified in response to Question 01-15c, please identify the capital investment made by SoCalGas or SDG&E and the fully allocated cost of the modification or upgrade.

RESPONSE 01-15:

a. Since the last TCAP application was filed on November 1, 2011, SoCalGas has built two (2) new public access NGV refueling stations at the following locations:
   - SoCalGas Lancaster Base - 44416 North Division Street, Lancaster, CA 93535
   - SoCalGas Murrieta Base - 25620 Jefferson Avenue, Murrieta, CA 92562

   During the same time period, SDG&E has not built any new public access NGV refueling stations.

b. The capital investment made by SoCalGas for the stations identified in Response 01-15(a) are as follows:
   - SoCalGas Lancaster Base - $1,978,191
   - SoCalGas Murrieta Base - $ 2,257,930

c. Since the last TCAP application was filed on November 1, 2011, SoCalGas has modified or upgraded five (5) public access NGV refueling stations at the following locations:

   - SoCalGas Azusa Base - 950 North Todd Avenue, Azusa, CA 91702

- SoCalGas Santa Barbara Base - 219 North Quarantina Street, Santa Barbara, CA 93103
- SoCalGas Saticoy Base - 16645 Saticoy Street, Van Nuys, CA 91406
- SoCalGas Compton Base - 1471 East Elm Street, Compton, CA 90221
- SoCalGas Garden Grove Base - 12698 Industry Street, Garden Grove, CA 92841

During the same time period, SDG&E has modified or upgraded one (1) public access NGV refueling station at the following location:

- SDG&E North Coast Base - 602 Cannon Road, Carlsbad, CA 92008

d. The capital investment made by SoCalGas for the stations identified in Response 01-15(c) are as follows:
   - SoCalGas Azusa Base - $1,041,906
   - SoCalGas Santa Barbara Base - $173,294
   - SoCalGas Saticoy Base - $1,510,169
   - SoCalGas Compton Base - $1,108,708
   - SoCalGas Garden Grove Base - $1,381,100

The capital investment made by SDG&E for the station identified in Response 01-15(c) is as follows:

- SDG&E North Coast Base - $1,525,680