

SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION FOR APPROVAL TO EXTEND THE MOBILE HOME PARK UTILITY
UPGRADE PROGRAM

(A.17-05-007)

(DATA REQUEST ORA-SCG-006-CY3)

QUESTION 1:

With regard to Footnote 8 on page JSV-3 of Ch. 1, please explain the reason(s) that SoCalGas will not be able to meet the 10% target of the pilot by the original deadline of December 31, 2017.

RESPONSE 1:

The reasons SoCalGas is requesting additional time to complete its 10% MHP Pilot target beyond December 31, 2017 are due to several factors including the ability to fill behind MHPs that dropped out of the program, delays caused by cultural and environmental findings at construction sites, contractor availability, completion of owner responsibilities as they relate to site mitigation and documentation, coordination with other utilities, and completion of beyond-the-meter construction by the MHP owners' contractor. SoCalGas will also need additional time to complete the transfer of residents with recently completed systems over to the new SoCalGas service, remove the master meter, perform final paving at these MHPs and fully reconcile the close-out activities (e.g., processing of invoices, complete final documentation and record as-built designs in SoCalGas' system).

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QUESTION 2:

With regard to the distribution of sizes of MHPs, as discussed in lines 11 to 14 of page JSV-17 of Ch. 1, please provide a list of all MHPs on the waitlist referenced in lines 12-13. This list should include:

- a. Name of the MHP;
- b. Number of MHP spaces;
- c. Number of interspersed RV spaces;
- d. Number of permanent residential buildings;
- e. Designation as Category 1, 2, or 3;
- f. Identification of any other serving utilities with whom costs could be shared;
- g. Whether the MHP conversion would be gas-only, electric-only, or both;
- h. Length of pipeline by material (coated steel, bare steel, polyethylene, PVC, or other);
- i. The predominant amps per electric panel at each space;
- j. Gas system pressure (psi);
- k. Presence and type (impressed/sacrificial/both) of cathodic protection system;
- l. Locations of gas mains (yard easement or street);
- m. Number of directly served spaces;
- n. Installation date of system;
- o. Whether the system has been replaced wholly or in part within the last 20 years.

RESPONSE 2:

The response to this question and the data provided is based on the information provided by the MHP owner/manager on the CPUC's Form of Intent (FOI). SoCalGas initiates contact to complete a detailed application only after the MHP has been selected by SED to move forward.

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Since this has not yet taken place, SoCalGas has no information other than that provided in the FOI. A list of the 670 MHPs is provided on the attached Excel file titled "ORA-SCG-006-CY3-Q2". **Please note that the yellow highlighted information on the attachment is confidential and protected material pursuant to PUC Section 583, GO-66C and D.16-08-024.**

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF JOE VELASQUEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.16-08-024**

I, Joe Velasquez, do declare as follows:

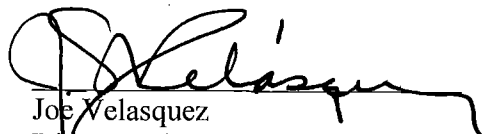
1. I am the Director of Master Meter Customer Programs for Southern California Gas Company ("SoCalGas"). I have been delegated authority to sign this declaration by Gina Orozco-Mejia, Vice President of Gas Operations. I have reviewed the data response in Application (A.) 17-05-007 to the Office of Ratepayer Advocates ("ORA") titled "ORA-SCG-006-CY3." In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision ("D.") D-16-08-024 to demonstrate that the yellow-highlighted confidential information ("Protected Information") provided in the Excel file titled "ORA-SCG-006-CY3-Q3 (conf.);" included with Response 2 to ORA-SCG-006-CY3, is within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities ("PUC") Code § 583 and General Order ("GO") 66-C, as described in Attachment A below.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 14th day of July, 2017, at Los Angeles, California.


Joe Velasquez
Director of Master Meter Customer
Programs

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information contained in ORA-SCG-006-CY3

Location of Protected Information	Legal Authority	Narrative Justification
Data Request ORA-SCG-006-CY3 in A.17-05-007, yellow-highlighted cells in the Excel file titled “ORA-SCG-006-CY3-Q2 (conf.)” included with Response 2.	GO 66-C Section 2.2(b) Gov’t Code §§6254(k), 6254.7 (d); Evidence Code §1060; Civil Code §3426 <i>et seq.</i>	The yellow-highlighted cells contain MHP names. This is market-sensitive information that, if revealed, could put the MHP at an unfair business disadvantage because it provides nonpublic information regarding MHP program participation.