

**INDICATED SHIPPER DATA REQUEST
IS-SCG-010
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: JUNE 25, 2018
DATE RESPONDED: JULY 3, 2018**

10-01 Please provide executable versions of all rebuttal filings and supporting workpapers in native format with all formulas intact.

SoCalGas Responses 10-01:

Executable versions, where available, of all rebuttal filings and supporting workpapers are being provided to Indicated Shippers via Electronic Data Transfer (EDT). Please note documents include Confidential material, **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023.**

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10-02 Please provide a copy of any confidential portions of the rebuttal testimony or material referenced in the rebuttal testimony or workpapers.

SoCalGas Responses 10-02:

Confidential version of rebuttal testimony and appendices are being provided to Indicated Shippers via EDT. Documents include Confidential material, **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023.**

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10-03 Has SoCalGas performed any analysis or comparison of its natural gas transportation rates with rates of other natural gas distribution companies operating in the United States? If so, please provide all documents related to such analysis. If no analysis has been performed, explain why SoCalGas does not believe it is relevant to perform such analysis.

SoCalGas Responses 10-03:

No, SoCalGas has not performed any analysis or comparison of its natural gas transportation rates with rates of other natural gas distribution companies operating in the United States. SoCalGas believes that it is not relevant to perform such analysis.

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10-04 Does SoCalGas possess any analysis or comparison of its natural gas transportation rates with rates of other natural gas distribution companies operating in the United States? If so, please provide all documents in SoCalGas's possession related to such analysis.

SoCalGas Responses 10-04:

The 2016 AGA survey mentioned in Mr. Chaudhury's rebuttal testimony (Exhibit SCG-246/SDG&E-245) contains residential data on annual revenues, number of customers, and annual usage for the 50 largest gas utilities. Based on annual revenues and usage, one can calculate residential rates for these 50 gas utilities. Please see separately attached AGA's 2016 survey, "IS-SCG-010 Q4 AGA 2016 Top 50 Residential Utilities.pdf."

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10-05 Has SoCalGas performed any analysis of the impact of 2019 GRC rate impacts on industrial natural gas end-use customers generally? On industrial transmission customers more specifically? If so, please provide all documents related to such analysis.

SoCalGas Responses 10-05:

Yes, SoCalGas performed an analysis of the impact of 2019 GRC rate impacts on industrial natural gas end-use customers generally and on industrial transmission customers more specifically. Separately attached in “IS-SCG-010 Q5 SoCalGas GRC Rate Tables.xlsx” is the rate analysis. Rate Table 3 has the Core Commercial and Industrial rates comparison. Rate Table 5 has the Noncore Distribution Commercial and Industrial rates comparison. Rate Table 7 has the Noncore Transmission Commercial and Industrial rates comparison.

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10-06 At Page 7 of the March 8, 2017 Staff Report on Risk and Safety Aspects of Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company, Investigation 16-10-015 and I.16-10-016, Staff state:

The following should be considered for improvement in the GRC presentation and workpapers:

- *In the RSE, use plausible comparisons that connect causal relationships to information provided for making a sound decision on whether the increase in spending would be reasonable and the incident rate reductions possible.*
- *More thoroughly outline plans for enhancing existing mitigations, and provide more information to sufficiently describe how enhancements differ and improve baseline (Control) activities with an estimate of risk reduction.*
- *Improve the correlation of the RSE to the baseline risks and the proposed risk mitigations in order for the RSE to be used as intended.*
- *Address the requirement to provide an RSE for the alternative mitigation programs, and work on presenting reasonable and viable alternatives and provide sufficient explanation of alternatives and their potential for risk reduction.*

The testimony of Diana Day discusses the Staff Report. Please provide further citations to testimony that demonstrates how SoCalGas incorporated these suggestions in the following chapters:

- a. SCG-05 Gas System Integrity- Omar Rivera
- b. SCG-06 Gas Transmission Operation- Elizabeth Musich
- c. SCG-07 Gas Transmission- Elizabeth Musich
- d. SCG-09 Underground Storage- Neil Navin
- e. SCG-14 Pipeline Integrity for Transmission and Distribution – Maria Martinez

SoCalGas Responses 10-06:

SoCalGas notes that while subpart d of this question references Exhibit SCG-09, an email communication from Katy Morsony, received on June 27, 2018, clarified the requested information is for Exhibit SCG-10, Underground Storage. Accordingly, SoCalGas' response pertains to Exhibit SCG-10, rather than Exhibit SCG-09.

The first, third, and fourth bullets listed in the quote above from the SED Evaluation Report on the Companies' RAMP filing address improvements related to Risk Spend Efficiency (RSE). As explained in Ms. Day's revised direct testimony (Exhibit SCG-02-R/SDG&E-02-R) at DD-17-18, the Companies did not include RSE calculations in this current GRC given that they are "evolving, should be further refined in the S-MAP, and have limited usefulness in their current state." Therefore, Exhibits SCG-05, SCG-06, SCG-07, SCG-10, and SCG-14 do not discuss RSE calculations. However, these five SoCalGas exhibits do describe, both through narrative and tables, the controls (2016 costs) and mitigations (estimated TY 2019 incremental), as applicable, related to RAMP. Further, SoCalGas explains in narrative how the mitigation activities relate to the RAMP risks.

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SoCalGas Responses 10-06:-Continued

In addition to the relevant workpapers, below are citations for each of the requested SoCalGas testimony exhibits:

- a. SCG-05 at Section I.B, Section II, and the cost sections (non-shared and shared O&M) such as Section III.A.
- b. SCG-06 at Section I.D, Section II, and Section III.D.
- c. SCG-07 at Section I.C, Section II, and the capital cost sections such as Sections III.B, E, and G.
- d. SCG-10 at Section I.B, Section II, Section III. A, B, D and the capital cost sections such as Section V.C, D, F, and G.
- e. SCG-14 at Section I.B, Section II, and the cost sections (non-shared, shared, and capital) such as Section III.B.

As of the date of this data request, there is a S-MAP settlement agreement pending before the Commission; one term of that settlement agreement would result in the further refinement of the RSE, which can be presented at the next GRC.