

ORA DATA REQUEST
ORA-SCG-058-MRK SUPPLEMENTAL
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: JANUARY 31, 2017
DATE RESPONDED: MARCH 8, 2017

Exhibit Reference: SCG-41

SCG Witness: Annette M. Steffen

Subject: Miscellaneous Revenues

Please provide the following:

During a January 31st telephone conversation between Truman Burns, Office of Ratepayer Advocates (ORA) and Kelly Hart, Southern California Gas Company (SoCalGas) and as memorialized via emails between ORA and SoCalGas on that same day, the two parties agreed that SoCalGas would provide 2016 recorded costs for CIAC construction costs, broken out by labor, non-labor, and budget code as originally requested in Question 2 of ORA-SCG-058-MRK.

This request was further revised during a telephone conversation between Clayton Tang and Truman Burns of ORA, on the one hand, and Chuck Manzuk, and Kelly Hart of SoCalGas on the other hand, on March 2, 2018, where the parties agreed that to satisfy ORA's request, (i) SoCalGas does not need to provide a perfect reconciliation to the numbers originally provided in response to Question 1 of ORA-SCG-012-MRK; and (ii) that as a proxy, SoCalGas can provide instead an analysis of a sample of the CIAC data and that this sample would be representative of the splits between labor and non-labor CIAC Construction costs.

SoCalGas Response 2:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the ground that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further on the ground that the burden and intrusiveness of this request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. SoCalGas has not requested a revenue requirement for CIAC construction costs. SoCalGas is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Based on the agreement with ORA on March 2, 2018, please see the attached Excel file: ORA-SCG-058-MRK Supplemental Attachment.