

**ORA DATA REQUEST
ORA-SCG-112-DAO
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: JANUARY 31, 2018
DATE RESPONDED: FEBRUARY 14, 2018**

Exhibit Reference: SCG-04-R and SCG-23-R

SCG Witness: Gina Orozco-Mejia and R. Herrera

Subject: Gas Distribution O&M and Capital Expenditures and Fleet Services
And Facility Operations

Please provide the following:

1. Referring to Ex. SCG-04-R revised testimony, page GOM-13, Table GOM-06, please provide the total number of vehicles by type recorded each year for Gas Distribution O&M and Capital work activities from 2012-2017, in the same format as Table GOM-06.

SoCalGas Response 1:

SoCalGas assumes ORA is requesting historical data for the vehicle types forecasted in Table GOM-06. Please see the table below, regarding the number of vehicles by type, for Gas Distribution from 2012 through 2017. SoCalGas does not record the number of vehicles by O&M or Capital work activities separately.

**Table
Southern California Gas Company**

**Gas Distribution
Historical Vehicles (2012-2017)**

Vehicle Type	2012	2013	2014	2015	2016	2017
Light-Duty Vehicle	317	401	519	534	586	627
Medium-Duty Vehicle (Van)	44	66	83	82	83	87
Heavy-Duty Vehicle (Crew Truck)	206	227	276	264	262	280
Total	567	694	879	881	932	994

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2. Referring to Ex. SCG-04-R SCG's revised testimony, page GOM-13, line 4, please provide a citation to SCG's witness R. Herrera's testimony, SCG-23-R, as referenced.

SoCalGas Response 2:

Carmen Herrera's testimony, SCG-23-R, page CLH-20, lines 6-14 discusses incremental vehicle costs per year. For additional information, please refer to SCG-23WP_Fleet-Fac workpapers and supplemental workpapers in 2RF003.001 - Amortization, pages 6 – 7, page 12, and page 14, 2RF003.002 - Interest, pages 18-19, and page 24, 2RF002.000 – Maintenance Operations, pages 43-44, and 2RF002.001 – Automotive Fuel, pages 49-50.

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3. Referring to Ex. SCG-04-R page GOM-13, line 4, and Ex. SCG-23-R, on the issue of vehicles, please provide the recorded costs incurred each year from 2012-2017 and the 2017-2019 forecasts by vehicle type.

SoCalGas Response 3:

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: Historical recorded vehicle costs are not in a format that allows them to be readily available nor to be extracted accurately to be presented by vehicle type. As a proxy, SoCalGas has provided the table below with the estimated costs incurred from 2012 through 2016 for the Gas Distribution vehicles referenced in GOM-13, line 4. These estimates were derived by multiplying the number of vehicles of each type in Gas Distribution at year-end by an annualized “Bill Rate”. The “Bill Rate” is established by pooling all associated costs by vehicle type (e.g., Passenger sedan, ½ ton pick-up, ½ ton pickup 4x4, ¾ ton pickup with service body) for the entire SoCalGas fleet (across all areas) and dividing by the number of vehicles in that class. Costs are inclusive of amortization, interest, license, salvage proceeds, tax, maintenance costs, fuel, and fleet management.

Vehicle Type	2012 (\$000)	2013 (\$000)	2014 (\$000)	2015 (\$000)	2016 (\$000)
Light-Duty Vehicle	2,700	2,500	1,900	1,900	3,700
Medium-Duty Vehicle	500	600	800	800	700
Heavy-Duty Vehicle	2,600	4,900	4,400	4,100	4,000
Total (Nominal Dollars)	5,800	8,000	7,100	6,800	8,400

Please refer to response 2, for Incremental Fleet for Business Needs projections for the 2017 through 2019 forecast period. The forecast model does not break-up the amortization, interest, salvage, license fees, and sales tax by vehicle type or operating group. The model provides forecasts in each of the presented groupings: Airborne Toxic Control Measure (ATCM) required replacements, incremental vehicles for business needs, Alternate Fuel Vehicle (AFV) premium, and existing vehicle replacements due to replacement criteria being met. This information is also listed in the workpapers SCG-23WP_Fleet-Fac 2RF003.001 – 2RF003.004.