

**SCGC-SEU DATA REQUEST-003**  
**SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8**  
**SEU RESPONSE**  
**DATE RECEIVED: APRIL 2, 2018**  
**DATE RESPONDED: APRIL 16, 2018**

3.1 With respect to the Applicants' response to SCGC-SEU-02, Q.2.8.1, is the information identifying the entity that procures gas on behalf of core customers uploaded to the Data Warehouse?

**Utility Response 3.1:**

- a. No, this information is not uploaded to the Data Warehouse.

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3.2 If the answer to the previous question is “yes,” please state how frequently the information identifying the entity that procures gas on behalf of core customers is uploaded to the Data Warehouse.

**Utility Response 3.2:**

Not applicable, see the response to Question 3.1

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3.3 With respect to the response to SCGC-SEU-02, Q.2.8.3, please state what data constitutes “master data”, defining each category that is included in the data uploaded to the Data Warehouse from the CIS database on a daily basis.

**Utility Response 3.3:**

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that the request seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

As used in SoCalGas’ response to SCGC-SEU-02, Q.2.8.3, “master data” is a single source of common business data used across multiple systems, applications, and/or processes.

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3.4 With respect to the response to SCGC-SEU-02, Q.2.8.4:

3.4.1 Please explain in detail what is meant by “revenue data” and state what other data (e.g., customer number or identifier) is included in the data that is uploaded to the Data Warehouse on a monthly basis.

3.4.2 Does the data uploaded to the Data Warehouse include the heat content of the gas that is used in calculating the amount of therms billed to customers during the previous month?

3.4.3 If the answer to the previous question is “no,” is the heat content of the gas that is used in calculating the amount of therms billed to customers uploaded to the Data Warehouse from any other source?

**Utility Response 3.4:**

3.4.1 As used in SoCalGas’ response to SCGC-SEU-02, Q.2.8.4, “revenue data” is the monthly as-billed consumption for SoCalGas customers. It contains details such as the billing period (start and end date), bill account, facility, service point, rate (tariff), CCF total (hundred cubic feet), Therm total, total gas charges, total non-gas charges, and total bill amount.

3.4.2 SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that the request calls seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

3.4.3 Subject to the objection set forth above in response to Question 3.4.2, SoCalGas responds as follows. Not applicable, see response to Question 3.4.2.

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3.5 With respect to the response to SCGC-SEU-02, Q.2.8.5:

- 3.5.1 Please confirm that the data from the CIS database that is uploaded to the Data Warehouse can be queried simultaneously with the AM interval data within the Data Warehouse.
- 3.5.2 How long would it take to run a query that simultaneously selects a portion of data from the CIS data that has been uploaded to the Data Warehouse and all of the AMI data that has been uploaded to the Data Warehouse and writes the data to a new database within the Data Warehouse converting the hourly reads of cubic feet to therms?

**Utility Response 3.5:**

- 3.5.1 Yes, the CIS data in the Data Warehouse can be queried with the AM interval data as it is made available within the Data Warehouse.
- 3.5.2 How long it would take depends on the specific, detailed requirements for the query and the format of the “new database.”

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- 3.6. With respect to the response to SCGC-SEU-02, Q.2.5.4:
- 3.6.1. Please state what times during each day the “Data Warehouse initiates several load processes that transfers hourly reads and usage data (in cubic feet, not therms) to the Data Warehouse.”
- 3.6.2. Each time the Data Warehouse initiates the load processes, is all of the AMI data that is present in the MDMS system for the previous Gas Measurement Day is uploaded to the Data Warehouse or only some portion of the data?
- 3.6.3. If only some portion of the data is uploaded as described in the previous question, please specify how that portion of the data is determined.
- 3.6.4. How long does it take to upload the data from the MDMS system to the Data Warehouse?

**Utility Response 3.6:**

SoCalGas objects to Question 3.6 under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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3.7. With respect to the response to SCGC-SEU-02, Q.2.4.6 to Q.2.4.8, based on SoCalGas' experience during the previous three years, please state the expected percentage failure rate for MTUs transmitting their data.

**Utility Response 3.7:**

SoCalGas AMI consistently reports on MTU transmission in its semi-annual reports<sup>1</sup> to the Commission. The most recent Module Communication Status metric for MTUs “Missing All Reads” is 0.1% of the MTUs installed with network coverage.

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<sup>1</sup> <https://www.socalgas.com/regulatory/A0809023.shtml>

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3.8 With respect to the response to SCGC-SEU-02, Q.2.2.4, are the modules randomly assigned to one of the six data transmittal schedules?

**Utility Response 3.8:**

SoCalGas objects to Question 3.8 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.



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3.9 If the answer to the previous question is “no,” please state the basis upon which the modules are assigned to one of the six data transmittal schedules.

**Utility Response 3.9:**

SoCalGas objects to Question 3.9 under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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3.10. With respect to the response to SCGC-SEU-01, Q.1.4.6, does the witness have any reason to believe that such a query would not be possible?

**Utility Response 3.10:**

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

See Supplemental Response to 1.4.6 on March 22, 2018.

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3.11 If the answer to the previous question is “yes,” please state any reason that would make the witness believe that the query would not be possible.

**Utility Response 3.11:**

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

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3.12. With respect to the response to SCGC-SEU-01, Q.1.5., SoCalGas states its objection to the question “in that it assumes that ENVOY is not currently capable of changing certain attributes with sufficient time and funding as mandated by the Commission.”

3.12.1. Given the response to Q.1.5.1 that states: “As proposed in this Test Year 2019 General Rate Case (TY2019 GRC), the ENVOY enhancements address the foundational architecture only.” Would the enhancements to the ENVOY foundation architecture proposed in this proceeding be expected to enable future changes to ENVOY at a lower cost than would be possible with the current ENVOY architecture for a change such as enhancing customers’ ability to manage their nominations?

3.12.2. Given the response to Q.1.5.3 that states: “As proposed in this Test Year 2019 General Rate Case (TY2019 GRC), the ENVOY enhancements address the foundational architecture only.” Would the enhancements to the ENVOY foundation architecture proposed in this proceeding be expected to enable future changes to ENVOY at a lower cost than would be possible with the current ENVOY architecture for a change such as allowing core and/or noncore customers to see their Measurement Day burn early in the day following the metered Measurement Day?

3.12.3. Given the response to Q.1.5.5 that states: “As proposed in this Test Year 2019 General Rate Case (TY2019 GRC), the ENVOY enhancements address the foundational architecture only.” Would the enhancements to the ENVOY foundation architecture proposed in this proceeding be expected to enable future changes to ENVOY at a lower cost than would be possible with the current ENVOY architecture for a change such as notifying customers of their imbalance position for the previous Measurement Day on a daily basis?

3.12.4. Given the response to Q.1.5.7 that states: “As proposed in this Test Year 2019 General Rate Case (TY2019 GRC), the ENVOY enhancements address the foundational architecture only.” Would the enhancements to the ENVOY foundation architecture proposed in this proceeding be expected to enable future changes to ENVOY at a lower cost than would be possible with the current ENVOY architecture for a change such as allowing customers to trade their daily gas imbalances with other customers?

**Utility Response 3.12.1-4:**

SoCalGas objects to this request and all of its subparts pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks information that is neither relevant to the subject matter involved in this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence for this proceeding.

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**Utility Response 3.12.1-4:-Contined**

SoCalGas also objects to this request on the grounds that it assumes facts not in evidence and lacks foundation in that it assumes that ENVOY is not currently capable of changing certain attributes with sufficient time and funding as mandated by the Commission, and calls for the speculation. Subject to and without waiving this objections, SoCalGas responds as follows:

SoCalGas envisions that the proposed architectural enhancements to ENVOY included in its Test Year 2019 General Rate Case and discussed in Exh. SCG-13 at 25:8-20 and in response to SCGC-SEU-01, Q.1.5., should allow for future modifications of ENVOY at a lower cost compared to the current architecture foundation.