

SIERRA CLUB- UCS DATA REQUEST
SIERRA CLUB-SCG-003
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: MARCH 21, 2018
DATE RESPONDED: APRIL 6, 2018

1. SoCalGas Response 11 to Sierra Club/UCS-SoCalGas-02 states that “Fleet-Public NGV stations are planned based on surveys conducted by the SoCalGas NGV team.”
 - a. If “surveys” refers to a set of questions of the opinions of a group of people:
 - i. Who did the SoCalGas NGV team survey?
 - ii. How many responses to the survey did SoCalGas receive?
 - iii. Please provide the survey questions and results.
 - b. If “surveys” does not refer to a set of questions, please explain what type of survey was conducted.
 - c. How many NGV stations are in SoCalGas service territory that are not owned by SoCalGas?
 - d. Please provide a map indicating the location of all existing NGV stations in SoCalGas service territory and the location of the proposed Fleet-Public NGV stations.
 - e. Please indicate the approximate distance to the nearest existing public access NGV station to each proposed Fleet-Public NGV station.

SoCalGas Response 1:

- a. SoCalGas clarifies that the surveys referenced in the original response were conducted by a third party that develops and sells proprietary fleet vehicle data. SoCalGas has no knowledge of the methodology used for the survey and SoCalGas is not in possession of the surveys or responses.
- b. Please see response a.
- c. As of the end of 2017, there were 305 G-NGV meters in the SoCalGas service territory serving customers other than SoCalGas. By tariff, each CNG station served by SoCalGas must have a dedicated meter. Therefore, there are at least 305 CNG stations in the SoCalGas service territory that are not owned by SoCalGas.
- d. Please see the listing and map of public NGV stations reported to the department of energy at https://www.afdc.energy.gov/fuels/natural_gas_locations.html#/find/nearest?fuel=CNG. Please see the below listing of proposed new Fleet-Public NGV stations address’.

<u>Current Fleet-Public NGV Stations Upgrades</u>	<u>Address</u>
Azusa	950 N. Todd Ave, Azusa CA 91702
Compton	700 N. Long Beach Blvd, Compton CA 90221
Garden Grove	12631 Monarch Street, Garden Grove CA 92841
Murrieta	25620 Jefferson Ave, Murrieta CA 92562
San Pedro	755 W. Capitol Dr, San Pedro CA 90731

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SoCalGas Response 1: -Continued

<u>Current Public NGV Stations Upgrades</u>	
Autogas	N/A
ERC	9240 Firestone Blvd, Downey CA 90241
Oxnard	1650 Mountain View Ave, Oxnard CA 93030
<u>Current Fleet Only NGV Station Upgrades to Add Public Access Station</u>	
Chino	13525 12th Street, Chino CA 91710
<u>New Fleet-Public NGV Stations</u>	
Beaumont	251 E. 1st St, Beaumont CA 92223
Blythe	13100 W. 14th Ave, Blythe Ca 92225
Branford	12475 Branford St, Pacoima CA 91331
Corona	1775 Sampson Ave, Corona CA 92879
Fontana	16231 Valley Blvd, Fontana CA 92335
Ramona	25200 Trumble Rd Romoland CA 92380
Redlands	1981 W. Lugonia Ave, Redlands CA 92374
San Luis Obispo	750 Industrial Way, San Luis Obispo CA 93401
Santa Maria	3138 Industrial Parkway, Santa Maria CA 93455
Valencia	24650 Avenue Rockefeller, Valencia CA 91355
Visalia	404 N. Tipton Street, Visalia CA 93292

e. SoCalGas does not have this information available, however Sierra Club can refer to the data provided in response 1d.

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2. SoCalGas Response 13 to Sierra Club/UCS-SoCalGas-02 provided the “number of vehicles placed into service in 2017, that are replacing an existing vehicle.”
- a. Please provide the number of new vehicles placed into service in 2017 that are not replacing an existing vehicle by vehicle and fuel type (similar to the format provided in Response 13).

SoCalGas Response 2:

VEHICLE TYPES	BI-FUEL CNG	DED CNG	DIESEL	HYBRID	POE	UNLEADED
AUTOMOBILES	4			1		
COMPACT TRUCK VANS						13
LIGHT TRUCK VANS	1	3				33
MEDIUM DUTY TRUCK			2			1
NON MECHANIZED TRAILER					5	
P.O.E. / M.W.E.			1			

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3. Exh. SCG-23-WP-S-C at p. 1 lists premiums for alternative fuel vehicles (AFVs) for various vehicle classes and technologies.
- a. From what information or source were these premium estimates derived? Please provide citations and attach any reports that are not publicly available.
 - b. Given the identified premium difference between CNG and Hybrid full size truck and vans, please explain the rationale for SoCalGas purchasing the more expensive CNG vehicles for this vehicle class.
 - c. Please explain the market sensitivity justifying confidential treatment of listed premium estimates in SCG-23-WP-S-C, including why premium estimates in response to Sierra Club/UCS-SoCalGas-01 Q. 3(c) are public, but the estimates on SCG-23-W-S-C p. 1 are not.

SoCalGas Response 3:

- a. The estimates for AFV premiums are derived using information from available historical costs for AFV technology, vendor quotes, and information about upcoming projects and industry developments. Please see attached confidential invoices, Sierra Club-UCS-SCG-003-Q3-AFV Premium Invoices. **The attached document is Confidential Pursuant to P.U. Code Section 583 & General Order GO 66-D and D.17-09-023, and is accompanied by supporting declaration.**
- b. At the time of this forecast, Hybrid (electric) trucks were not an available market option, thus, SoCalGas used AFVs in the marketplace. Further, SoCalGas does not have charging infrastructure for plug-in vehicles.
- c. Data provided in Data Responses to Sierra Club/UCS-SoCalGas-01 Q3.c are historically paid premiums for AFV technology, while data presented in SCG-23-WP-SCG are forecasted (based partly on newly negotiated pricing specific to our company) as described in response 3a.

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 - a. From what information or source were these premium estimates derived? Please provide citations and attach any reports that are not publicly available.
 - b. Given the identified premium difference between CNG and Hybrid full size truck and vans, please explain the rationale for SoCalGas purchasing the more expensive CNG vehicles for this vehicle class.
 - c. Please explain the market sensitivity justifying confidential treatment of listed premium estimates in SCG-23-WP-S-C, including why premium estimates in response to Sierra Club/UCS-SoCalGas-01 Q. 3(c) are public, but the estimates on SCG-23-W-S-C p. 1 are not.

SoCalGas Response 3:

Response Pending

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4. Question 3(e) & (f) of Sierra Club/UCS-SoCalGas-01 requested the “average annual O&M for each vehicle class” of alternative fuel vehicles and non-alternative fuel vehicles. The response stated that “SoCalGas does not track O&M costs in this manner.”
- a. How does SoCalGas track O&M costs of its vehicle fleet?
 - b. Does SoCalGas track the O&M costs of its vehicle fleet by fuel type and vehicle type (e.g. in categories listed in response to Question 2(a) of Sierra Club/UCS-SoCalGas-01)? If so, please provide this information.

SoCalGas Response 4:

- a. Vehicle costs are pooled for maintenance expenses and not distinguish between fuel types.
- b. Please see response 4a. SoCalGas tracks O&M costs by vehicle type.

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5. Page 7 of Confidential Workpaper SCG-23-WP-S-C lists costs for upgrades to existing or for new NGV stations in years 2017 through 2019.
 - a. What is the basis for including NGV stations in this list where that station does not have costs listed in 2017, 2018, or 2019.
 - b. Please explain why the costs of new public access NGV refueling stations should be assumed by SoCalGas ratepayers rather than private developers of refueling stations.

SoCalGas Response 5:

- a. The non-costs line items were included in error. Please see the confidential attachment provided to ORA, “ORA-SCG-144-LMW-734-NGV Stations (updated)” that updates information in Supplemental Capital workpaper 734-NGV Stations. The attachment more clearly categorizes each station into Fleet only or Fleet-Public categories.
- b. SoCalGas objects to this request on the grounds that it calls for a legal conclusion rather than the production of evidence or clarification of factual matter. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: These costs should be paid by ratepayers because the NGV stations benefit ratepayers. There is a public policy interest in California for promoting a cleaner environment through the promotion and development of equipment and infrastructure for low-emission vehicles. For example, Public Utilities Code 740.3 states, “The commission...shall...implement policies to promote the development of equipment and infrastructure needed to facilitate the use of...natural gas to fuel low-emission vehicles” and “The commission’s policies...shall ensure that the costs and expenses of those programs are not passed through to electric or gas ratepayers unless the commission finds and determines that those programs are in the ratepayers' interest”. Public Utilities Code 740.8’s definition of ratepayer interest includes elements such as “Reduction of health and environmental impacts from air pollution”, Reduction of greenhouse gas emissions related to electricity and natural gas production and use”, and “Increased use of alternative fuels”. Natural gas vehicles use an alternative fuel.

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6. Page ASC-38:28-30 of Exh. SCG-20 states that “from 2012-2016, the number of customers submitting “Preliminary Site Evaluation Forms” (to determine how a specific, proposed location might be served with gas service for a CNG station, has increased by almost 74%).”
- a. What does SoCalGas mean by “customers” in this sentence? (E.g. does this refer to private-sector entities seeking to construct and/or operate a CNG station?)

SoCalGas Response 6:

- a. With respect to “Preliminary Site Evaluation Forms”, the term “customers” refers to any entity that seeks to construct and/or operate a CNG station and would benefit from understanding how a specific, proposed location might be served by gas service by the utility.

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7. Please provide the CONFIDENTIAL version of Exh. SDG&E-21-WP-S. (All recipients of this data request response (Matt Vespa, Alison Seel, and Jimmy O’Dea) have executed an NDA.

SDG&E Response 7:

See separately attached file “Q7 Attachment: SDG&E-21 CHerrera Supplemental Confidential.pdf,” which contains **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023.**

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8. Table CLH-5 of Exhibit SDG&E-21-R lists the vehicle types in SDG&E’s fleet.
- a. Please identify the number of vehicles by fuel source for each vehicle type listed in Table CLH-5 in a similar format to the response to Question 2(a) of Data Request Sierra Club/UCS-SoCalGas-01.
 - b. Please provide the actual number of replacement vehicle units in 2017 by vehicle and fuel type in similar format to Question 13 of Data Request Sierra Club/UCS-SoCalGas-02.
 - c. Please provide the number of new additional (non-replacement) vehicle units purchased in 2017 by vehicle and fuel type.

SDG&E Response 8:

a.

VEHICLE TYPES / No. of Units by Fuel Type	CNG	DIESEL	ELECTRIC	ELECTRIC HYBRID	N/A*	UNLEADED	BI-FUEL
AUTOMOBILES	11		12	63		1	
COMPACT TRUCK & VANS						325	
LIGHT TRUCK & VANS	2	58		2		629	36
MEDIUM DUTY TRUCK		246			34	80	
HEAVY DUTY TRUCK		212				1	
Non-OTR							
MECHANIZED TRAILER		54	1		36	9	
NON MECHANIZED TRAILER		4			216	2	
P.O.E. / M.W.E.		49	14			1	2
OTHER		34					

*Data from this historical record did not contain enough information for some records to determine Fuel Type.

b.

2017 Replacement Vehicles by Fuel Type				
Vehicle Type	BI-FUEL CNG	DIESEL	NONE	UNLEADED
2 - COMPACT TRUCK/VAN				2
3 - LIGHT TRUCK/VAN	34			
4 - MEDIUM DUTY TRUCK		54		8
5 - HEAVY DUTY TRUCK		17		
6 - MECHANIZED TRAILER		6		
7 - NON MECHANIZED TRAILER			1	
8 - P.O.E.		1		

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SDG&E Response 8:-Continued

c.

2017 Incremental Vehicles by Fuel Type					
Vehicle Type	BI-FUEL CNG	DIESEL	ELECTRIC	POE	UNLEADED
1 - AUTOMOBILE			2		
2 - COMPACT TRUCK/VAN					2
3 - LIGHT TRUCK/VAN	4				
4 - MEDIUM DUTY TRUCK		4			
5 - HEAVY DUTY TRUCK		3			
6 - MECHANIZED TRAILER		2			6
7 - NON MECHANIZED TRAILER				3	
8 - P.O.E.			4		

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9. In SoCalGas Response 4(c) to Sierra Club/UCS-SCG-02, which asked if the Policy and Environmental Solutions group conducts advocacy activities before transit agencies and local governments regarding vehicle fleet procurement, SoCalGas responded, “SoCalGas shares the facts about vehicle fleet procurement as we know them and educates these entities (who are SoCalGas customers) about potential customer and operational impacts.”
- a. Are the activities described in SoCalGas’s response conducted by the Policy and Environmental Solutions group?
 - b. Are the activities described in SoCalGas’s response also conducted by any other groups within SoCalGas? If so, please identify all groups that conduct these activities.

SoCalGas Response 9:

SoCalGas incorporates by reference its objection and response to Sierra Club-UCS Data Request SCG-002, Question 4(c) and responds as follows:

- a. Yes. Consistent with serving our customers, the Policy and Environmental Solutions group shares the facts about vehicle fleet procurement as we know them and educates these entities about potential customer and operational impacts.
- b. Yes. Clean Transportation Services and Regional Public Affairs also conduct the activities described in SoCalGas’ response to Sierra Club-UCS-SCG-002, Question 4(c).

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10. Exhibit SCG-20-R (Revised Cheung Direct Testimony) at p. ASC-18, Table AC-10, requests funding for the Customer Marketing and Communications team that includes funding for “driving to the website (1x/yr).”
- a. Is the reference to “website” a typographical error?
 - b. If yes, please provide the corrected funding request. If no, please explain the meaning of “website” in this context.

SoCalGas Response 10:

- a. No.
- b. “Website” as referenced in Exhibit SCG-20-R at ASC-18, Table AC-10 refers to the SoCalGas website where “driving to the website” refers to the targeted communications referenced in Exhibit SCG-20-R, page ASC-20 lines 8-10, which will direct DAC customers to dedicated web pages on SoCalGas’ website for more information regarding all benefits, program offerings, and climate change impacts.

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11. Exhibit SCG-20-R (Revised Cheung Direct Testimony) at p. ASC-22 requests an additional FTE “responsible for administering the increased social media communications.”
- a. How many FTEs are currently responsible for administering SoCalGas’s social media communications?
 - b. When were these existing FTEs created?

SoCalGas Response 11:

- a. With respect to the Digital Engagement team referenced in Exhibit SCG-20-R at page ASC-22, there is currently 0.5 FTEs responsible for administering SoCalGas’ social media communications.
- b. The 0.5 FTE referred to in response to question 11(a) began responsibility for administering social media communications during April 2015.

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12. Attached to this data request is a press release from March 14, 2018 titled “SoCalGas Donates \$100,000 to Support Cal State LA Combustion Engineering Research.” The article states that SoCalGas donated “\$100,000 to the College of Engineering, Computer Science, and Technology (ECST) at California State University, Los Angeles (Cal State LA) to support research and undergraduate education in combustion engineering.”
- a. Is SoCalGas seeking rate recovery for this donation? If yes, please identify where this expenditure is included in SoCalGas’s request. If no, please state whether this expenditure was authorized in a prior GRC.

SoCalGas Response 12:

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

SoCalGas is not seeking rate recovery for this donation. SoCalGas’ TY2019 seeks rate recovery for expenses forecasted for 2019-2021. In the TY2016, the Commission authorized a revenue requirement for the SoCalGas RD&D program. For the referenced donation, 70% was funded from the RD&D program budget and 30% was shareholder funded.

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13. In Appendix B to SCG-21 (Alexander Direct Testimony), SoCalGas lists a number of research, development and demonstration (“RD&D”) activities for which it seeks rate recovery. The descriptions in the column “SoCalGas RD&D Activities” often reference “support” – for example, “Support manufacturers development of a CARB compliant MicroCHP products” (p. LLA-B-4), and “Support research to map feedstock supplies and infrastructure requirements to identify optimal development locations” (p. LLA-B-8).

- a. Does the “support” referenced in these activity descriptions include financial contributions to research projects that are not conducted in-house by SoCalGas?
- b. Please provide a list of RD&D expenditures to outside parties (institutions, groups, and organizations that are not part of SoCalGas) since January 1, 2017 for which SoCalGas has or will seek rate recovery, including the amount of the expenditure and the payee.
- c. Does SoCalGas make any contributions or donations to research institutions for which it does not seek rate recovery? If so, please provide a list of any donations from January 1, 2017 to the present, including the amount of the donation and the payee.

SoCalGas Response 13:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that the preamble to the Question misstates the testimony and Appendix B to Exhibit SCG-21. Appendix B is a Technology Needs Assessment Summary, which was used to determine the TY 2019 RD&D Program Funding Forecast as described in Exhibit SCG-21, page LLA-10 and Table LLA-9, at page LLA-15. Subject to and without waiving the foregoing objection and clarifications, SoCalGas responds as follows:

- a. Yes. See Exhibit SCG-21, page LLA-17.
- b. See “SIERRA CLUB-UCS-SCG-003 Q 13 b Attachment.pdf” for a list of RD&D expenditures to institutions, groups and organizations. 2017 RD&D program expenses were authorized in the TY 2016 GRC decision, which covers expenses for the 2016-2018 time period.
- c. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of the pending proceeding and is unfairly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas’ Community Relations and Regional Public Affairs organizations make contributions or donations, which may include universities, for which rate recovery is not sought.

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14. Page ASC-19 of Exh. SGG-20 states that SoCalGas is seeking incremental funding to “take a more proactive approach to inform customers about the role of renewable gas in meeting the state’s goals to combat climate change, communicate the benefits of clean transportation in providing environmental benefits to customers especially in DACs, and educate customers on how SoCalGas is addressing its GHG emissions and SLCPs.”
- a. Please provide examples of existing customer communication materials from January 1, 2017 to the present to SoCalGas customers regarding each of the above-identified issues.
 - b. Is the press release referenced in Question 13 an example of a communication material related to the role of natural gas in relation to the state’s climate change policies the labor and non-labor costs of which SoCalGas seeks to ratebase? If not, and SoCalGas seeks to ratebase the costs associated with this press release, please identify where this expenditure is included in SoCalGas’s Application.

SoCalGas Response 14:

- a. In efforts to communicate to the broad customer base that SoCalGas serves, SoCalGas has created communications materials containing multiple topics, including those identified in Exhibit SCG-20-R, page ASC-19, lines 8-12. Examples of these materials are listed below and provided as separate attachments:
 - Near-Zero NOx Natural Gas Vehicle Engine - <https://www.youtube.com/watch?v=MzcNqLGrNdw>
 - Sierra Club-UCS-SCG-003-Q14 Attachment 1-Print.pdf
 - Sierra Club-UCS-SCG-003-Q14 Attachment 2-Banner.pdf
- b. SoCalGas assumes that this question should have referenced the press release referenced in Question 12. No, the press release referenced in Question 12 is not an example of communication material as described in Exhibit SCG-20-R, page ASC-19. SoCalGas does not rate base such costs; historical and forecasted costs for issuing news releases regarding company initiatives and programs are represented in the Prepared Direct Testimony of Stacey Lee, Exhibit SCG-33.

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15. SoCalGas Response 2(a) to Sierra Club/UCS-SoCalGas-01 is a table of vehicle and fuel types in the SoCalGas fleet.
- a. Does “bifuel” in this table refer to vehicles capable of running off natural gas and petroleum? If not, please define bifuel as used in this response.
 - b. What are the models of the heavy duty trucks referred to in this table?
 - c. What are the models of the medium duty trucks referred to in this table.
 - d. What is the distinction between “light trucks & vans” and “compact trucks & vans” as referred to in this table.

SoCalGas Response 15:

a. Yes, more specifically, CNG and gasoline.

b.

Make/Model

FORD F750
FRGHTLINER 122 SD
FRGHTLINER
CORONADO
FRGHTLINER FL60
FRGHTLINER FL70
FRGHTLINER M2106
FRGHTLINER M2112
INTERNATL 7400-4X2
INTERNATL 7600

c.

Make/Model

CHEVY C3500
CHEVY
C3500HD
CHEVY
EXPRESS
CHEVY K3500
CHEVY W5500
DODGE
SPRINTER3500
FORD E350
FORD E450
FORD F350
FORD F450
FORD F550

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SoCalGas Response 15:-Continued

FORD F600
FORD F650
FRGHTLINER
FL60
FRGHTLINER
M2106
FRGHTLINER
M2112
FRGHTLINER
VACUUM
TRUCK
GMC W350
GMC W5500
GMC W5S042
ISUZU LAB
VAN
ISUZU NQR
ISUZU W5500
MBZ
SPRINTER3500
RAM 5500
RAM D550
UTILIMASTR
STEP VAN

d. Light trucks and vans refers to ½ Ton vehicles such as Ford 150, Chevrolet 1500, Dodge 1500. Compact trucks and vans refers to vehicles smaller than light trucks and vans such as Ford Ranger and Chevrolet Colorado.

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16. Please provide the confidential response to ORA data request ORA-SDGE-065-SJL, Question 3 (confidential capacity resource table file).

SDG&E Response 16:

See separately attached **CONFIDENTIAL** document “Q16 Attachment: ORA-SDG&E-065-SJL Q3 S-1-Confidential.xlsx,” which contains **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023**, and accompanying Confidentiality Declaration (“Q16 Attachment: ORA-SDGE-065-SJL Q3 Confidentiality Declaration.pdf”).

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17. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-38:21-25 states: “The primary cost driver for an increase in Clean Transportation Services is based on the expected increase in the demand for NGV offerings as indicated by recent NGV market trends. It is expected that this level of growth will continue due to: a) increasing customer interest in CNG as a vehicle fuel, and b) the steadily increasing price advantage of CNG compared to diesel fuel.”

- a. Please provide all analysis supporting “an expected increase in the demand for NGV offerings.”

SoCalGas Response 17:

- a. As reflected in Exhibit SCG-20-R at page ASC-38, lines 6 through 19, the Clean Transportation cost drivers include customer demand for service, market activity, and regulatory and legislative activity. With respect to customer demand for service, Exhibit SCG-20-R, page ASC-38 beginning at line 21 to page ASC-39, line 6 provides the results of the analysis supporting the statements “an expected increase in the demand for NGV offerings” due to “increasing customer interest in CNG as a vehicle fuel” and “steadily increasing price advantage of CNG compared to diesel fuel”. The data supporting the conclusion for “increasing customer interest in CNG as a vehicle fuel” is shown in the table below:

	2012	2016	Total Growth (%)
G-NGV meters/stations	309	356	*15.2%
G-NGV volumes (million therms)	122.2	155.5	27.2%
Preliminary Site Evaluation Forms	38	60	*57.9%

*In preparing the response to this data request, errors were discovered with the percentages stated in Exhibit SCG-20-R, page ASC-38, on line 26 and 30. The table above provides the updated values. This correction will be made at the next available opportunity.

Additional information on historical Preliminary Site Evaluation Forms is provided in Exhibit SCG-20-R, ASC-B-1. The analysis for “steadily increasing price advantages of CNG compared to diesel fuel” is shown in the following attachment based on 2017 Energy Information Agency (EIA) Annual report data.

- Sierra Club-UCS-SCG-003-Q17-Attachment 3.xlsx