

SIERRA CLUB- UCS DATA REQUEST
SIERRA CLUB-SCG-002
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: FEBRUARY 14, 2018
DATE RESPONDED: MARCH 1, 2018

1. In SoCalGas Response 12 to Sierra Club/UCS-SoCalGas-01 regarding the expected useful life of the Central Compressor Station discussed in Exhibit SCG-11 (Buczowski Direct Testimony), SoCalGas referred to p. 14 of Exhibit SCG-36 (Ngai Direct Testimony) which, with regard to compressor station equipment, states:

This account includes installed compressor station equipment used for the purpose of raising the pressure of gas for delivery to underground storage or to raise the pressure of gas withdrawn from underground storage for delivery to the transmission or distribution system. The current life/curve is 41 L0.5. The average age of the surviving plant balance is 15 years. SoCalGas recommends retaining the 41-year average service life but moving to the S-.5 dispersion curve, ranked third on the best fit curve. The L-type curves result in a maximum life more than 100 years which is too long for assets in this group based on informed judgment and input from field personnel.

- a. Please explain the meaning of a “current life/curve” of 41 L0.5 as it pertains to the expected useful life of the proposed Central Compressor Station.
- b. Is this testimony asserting that the expected useful life of the proposed compressor station equipment is 41 years? If not, please state the expected useful life of the Central Compressor Station.

SoCalGas Response 1:

- a. Compressor station equipment is capitalized to Federal Energy Regulatory Commission (FERC) Account 354. The term “current life/curve” refers to the average service life and survivor pattern of the different assets in FERC Account 354 based on analysis of actual historical asset retirement rates and expected future life characteristics. Based on its depreciation study set forth in Exhibit SCG-36-R (Revised Direct Testimony of Flora Ngai), SoCalGas believes the service life characteristics of the proposed compressor station equipment will be similar to the assets in FERC Account 354. For more information, please refer to Exhibit SCG-36-R at page 3 (depreciation definitions), pages 4-6 (explanation of the depreciation study process), and pages 7-8 (explanation of actuarial analysis used for various FERC accounts, such as FERC Account 354).
- b. SoCalGas believes the proposed compressor station equipment will have similar life characteristics of assets in FERC Account 354. Exhibit SCG-36-R (Revised Direct Testimony of Flora Ngai) at page 14 states that the average useful life of all new assets (at age zero) in this account is 41 years. However, as assets age and survive beyond one (1) year, the probable life of assets will be longer than 41 years. Probable life is defined as the total expected life at a given age, or the sum of its age plus its remaining life. Remaining life is defined as the future expected service life at a given age. Based on SoCalGas’ proposed life/curve of 41 S-0.5 for assets in FERC Account 354 in this

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SoCalGas Response 1 Continued:

Test Year 2019 GRC, the total expected service life of assets in this Account is 47.2 years. This is shown in Exhibit SCG-36-WP-R (Revised Workpapers to Prepared Direct Testimony of Flora Ngai) at page 197, where the average age of all assets is 15.3 years and the average remaining life is 31.9 years ($15.3+31.9=47.2$). Therefore, although new assets at age zero will have an expected service life of 41 years, SoCalGas believes the total expected useful life of the proposed compressor station equipment will be between 41 to 47 years.

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2. Exhibit SCG-11 (Buczowski Direct Testimony) at p. DLB-6 states that the Commission approved a Certificate of Public Convenience and Necessity for the Aliso Canyon Turbine Replacement Project (“Project”) on November 22, 2013 (citing to D.13-11-023).
 - a. What is the current status of the Project (e.g., is the Project currently under construction, and if so, at what phase of construction)?
 - b. What is the currently estimated date of Project completion?

SoCalGas Response 2:

- a. SoCalGas is in the startup and commissioning phase of the Project.
- b. SoCalGas anticipates the Project will be placed in service in Q2 2018

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3. SoCalGas Response 21 to Sierra Club/UCS-SoCalGas-01 states: “SoCalGas incurred the expense for the [Decarbonizing Pipeline Gas] report during 2014, and it was funded out of GRC-authorized funds.” Please provide the specific authorization (e.g., section of GRC Decision or accepted settlement) for GRC-authorized funding for this report.

SoCalGas Response 3:

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: Ordering Paragraph 3b of D.13-05-010 adopted a test year 2012 revenue requirement for SoCalGas. Ordering Paragraph 4 of the same Decision authorized post-test year attrition adjustments escalating the authorized 2012 revenue requirement to establish authorized revenue requirements for 2013, 2014 and 2015. The incurred expense for the report was funded out of the authorized 2014 revenue requirement.

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4. Exhibit SCG-21 (Alexander Direct Testimony) at p. LLA-21 describes the function of non-shared services for the Policy and Environmental Solutions (“P&ES”) as including “educating local and regional governments on the needs of customers and environmental benefits and cost-effectiveness of natural gas and RG” as well as “developing franchise strategies.” (See Alexander Direct Testimony at p. LLA-21:8-9, 18). In SoCalGas Response 17(b) to Sierra Club/UCS-SoCalGas-01, SoCalGas provided additional specificity on the types of actions that constitute engagement with local governments as including increased fees, slurry backfill requirements, and restriction on the use of steel plates.
- a. What percentage of the labor and non-labor costs identified in Exhibit SCG-21 (Alexander Direct Testimony) at p. LLA-20, Table LLA-11 is for engagement with local governments on franchise agreements in the types of activities more fully described in SoCalGas Response 17(b)?
 - b. What percentage of the labor and non-labor costs identified in Table LLA-11 are for educating local and regional governments on the “environmental benefits and cost-effectiveness of natural gas and RG”?
 - c. Does the P&ES group conduct advocacy activities before transit agencies and local governments regarding vehicle fleet procurement (e.g., procurement decisions regarding natural gas-powered buses or electric buses)? If not, please identify what group at SoCalGas is responsible for SoCalGas’ activity in this area and whether SoCalGas is seeking rate recovery for those activities.
 - d. Please explain how the non-shared services related to environmental benefits of gas differ from the shared services related to climate and environmental issues identified at the beginning of Section IV on p. LLA-23.

SoCalGas Response 4:

4a. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it misstates SoCalGas’ response to Sierra Club /UCS-SoCalGas-01 Question 17 and related subparts. SoCalGas refers Sierra Club/UCS back to the full response to Question 17(b) and also Exhibit SCG-21 (Alexander Direct Testimony) at pp. LLA-20-21, and further responds as follows: Policy & Environmental Services does not track labor and non-labor costs by specific activities.

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SoCalGas Response 4 Continued:

4b. See response to Question 4a.

4c. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that Sierra Club/UCS have not defined what is meant by the use of the term “advocacy activities.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows: Consistent with serving our customers, 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. Providing a more comprehensive range of data and perspectives enables these entities to make informed decisions and helps mitigate adverse impacts to customers.

4d. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it is vague and ambiguous and unintelligible. Subject to and without waiving the foregoing objections, and to the extent SoCalGas understands what the question is asking, SoCalGas responds as follows: SoCalGas is unclear as to which portions of the direct testimony of Lisa L. Alexander Question 4d. is referring. The basic definition of non-shared services are those services performed on behalf of one utility, while shared services are performed on the behalf of more than one utility.

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5. Exhibit SCG-21 (Alexander Direct Testimony) at p. LLA-25:14-20 states: “The P&ES group provides policy guidance and analysis on proposed regulation and legislation to the Regulatory Affairs and State Government Affairs groups, which are responsible for management of proceedings before the Commission, state agencies and the legislature. P&ES has specific expertise with respect to air quality and climate change, and working group agencies (including the local air districts, CARB, CEC, California Department of Food and Agriculture (CDFA), CalRecycle and US EPA Region 9) to ensure that environmental policies are promulgated in a reasoned and consistent manner.”
- a. What is the distinction between the activities of the Regulatory Affairs and State Government Affairs groups, and the activities of the P&ES group before state agencies (*see, e.g.*, p. LLA-28:11-13 (Energy and Environmental Policy staff “is responsible for regulatory proceedings at CARB and CEC on natural gas utilization, environmental policy and regulation.”)).
 - b. Please provide all communications from January 1, 2017 to the present between P&ES and the Regulatory Affairs and State Government Affairs groups regarding the “policy guidance and analysis on proposed regulation and legislation” referred to at p. LLA-25:14-15.

SoCalGas Response 5:

5a. As noted in testimony Exhibit SCG-21, p. LLA-28:11-12, “The E&EP staff support the development and implementation of policies affecting natural gas and RG delivery and utilization.” This includes policy guidance and analysis on proposed regulations. Regulatory Affairs functions and activities are detailed in the direct testimony of Stacey Lee. State Government Affairs performs lobbying activity, and its costs have been excluded from GRC cost forecasts.

5b. 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. In addition, SoCalGas objects to the request as overbroad and burdensome. SoCalGas further objects to this request to the extent it seeks the production of documents protected by the attorney client privilege and work product doctrine.

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6. In SoCalGas Response 18 to Sierra Club/UCS-SoCalGas-01, which requested all comments to CARB, the CEC, and all air districts that SoCalGas asserts “serve to protect the interests of customers” (p. LLA-27:26-27), SoCalGas stated that “[l]etters and comments presented by SoCalGas to various public bodies...are part of the public record.”
- a. Please identify all dockets, rulemakings, and/or regulatory proceedings from January 1, 2016 to the present at CARB, the CEC, and all air districts where SoCalGas has submitted letters and comments
 - b. Is it SoCalGas’ position that all letters and comments submitted to CARB, the CEC, and all air districts “serve to protect the interests of customers”? If not, please identify those letters and comments, or portions of those letters and comments, that do not serve to protect the interests of customers.
 - c. Is it SoCalGas’ position that it is entitled to rate recovery for costs related to all letters and comments submitted to CARB, the CEC, and all air districts? If not, please identify those letters and comments, or portions of those letters and comments, for which SoCalGas is not seeking rate recovery?

SoCalGas Response 6:

6a. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it is overbroad and burdensome. Subject to and without waiving the foregoing objections SoCalGas responds as follows:

CARB Proceedings:	
Advanced Clean Transit / Innovative Clean Transit Rule	
Cap & Trade Regulation	
GHG Mandatory Reporting Program	
Oil & Gas Rule	
Scoping Plan Update	
Short-Lived Climate Pollutant Plan	
Sustainable Freight Action Plan	
SCAQMD Proceedings:	
Air Quality Management Plan	
BACT Guidelines	
Rule 1111	
SJVAPCD Proceedings:	

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Air Quality Management Plan	
Ventura County APCD Proceedings:	
Air Quality Management Plan	
CEC Proceedings	Docket #:
Natural Gas Research and Development Program	no docket
Building Energy Efficiency Standards	16-BSTD-06
Buildings Energy Efficiency Action Plan	16-EBP-01
Electric Program Investment Charge (EPIC) Program	17-EPIC-01
SB 350 Barriers Study	16-OIR-02
Title 20 Data Collection	16-OIR-03
Integrated Energy Policy Report (IEPR)	15-IEPR-01
	16-IEPR-01
	16-IEPR-02
	16-IEPR-04
	16-IEPR-05
	17-IEPR-01
	17-IEPR-06
	17-IEPR-07
	17-IEPR08
	17-IEPR-09
	17-IEPR-12
	17-IEPR-14

6b. Yes. As noted in Exhibit SCG-21, p. LLA-3:14-28, SoCalGas supports climate and air quality goals through Research, Development and Demonstration (RD&D) efforts, and by analyzing and determining how a broad range of legislative and policy issues will affect SoCalGas’ customers and operations, and then developing potential policy alternatives to help protect customer interests. SoCalGas has deep expertise in natural gas policy matters as well as natural gas technologies and their potential advancement. Further, SoCalGas has a unique role in representing the interests of its customers, including disadvantaged communities, on matters that relate to the production, distribution and use of natural gas. SoCalGas supports technology neutral policies and regulations, and we work to ensure that the most economic and feasible pathways to achieving state goals will be considered by policy makers. This includes policy and regulations that consider the potential uses of the natural gas system to achieve environmental and economic policy goals – helping keep rates down. Without SoCalGas’ involvement, policies and regulations developed to meet long-term environmental objectives would risk foregoing cost-effective emission

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SoCalGas Response 6 Continued:

reduction strategies involving the use of natural gas and RG, and the stability of having a diverse, resilient fuel portfolio.

6c. Yes.

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7. Exhibit SCG-21 (Alexander Direct Testimony) at pp. LLA-22:23-23:1 states: “SoCalGas anticipates expending significant resources engaging with local governments on climate, energy and sustainability planning issues....Other types of policies and plans underway include vulnerability assessments, GHG emissions inventories, GHG reduction plans, energy actions plans, adaptation or resilience plans, sustainability plans and local coastal programs.”
- a. Please identify all local government greenhouse gas (“GHG”) reductions plans and energy action plans SoCalGas has commented on from January 1, 2016, to the present.
 - b. Please provide all letters and comments from SoCalGas to local governments regarding proposed GHG reduction plans and energy action plans for January 1, 2016 to the present.

SoCalGas Response 7:

7a. From January 1, 2016 to the present, SoCalGas has commented on the following GHG reduction plans and energy action plans: Association of California Cities – Orange County Climate Action Plan, City of Indio General Plan, Draft Sustainable Community Element of the City of Redlands’ General Plan Update, San Bernardino County Draft Renewable Energy and Conservation Element, City of Pasadena Draft Climate Action Plan, Southern California Association of Government’s Regional Transportation Plan/Sustainable Communities Strategy, and City of La Canada Flintridge Climate Action Plan.

7b. 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, and to the extent it would require SoCalGas to search for matters of public record in public proceedings. This information is equally available to Sierra Club/UCS. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: SoCalGas does not track all comments to local governments, and to the extent it provides written comments, they are a matter of public record and equally available to Sierra Club/UCS.

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8. In SoCalGas Response 10(b)(ii) to Sierra Club/UCS-SoCalGas-01, SoCalGas provided the date, station, and reason for methane leakage from refueling stations in 2017.
 - a. Please provide leakage records from gas refueling stations from 2007 through 2016.
 - b. If known, please provide the estimated quantity of methane that leaked in each recorded incident.

SoCalGas Response 8:

- a. SoCalGas objects to this request 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. Leaks and leakage records from 2007 to 2016 are not relevant to this proceeding. SoCalGas further objects to this request on the grounds that it is overbroad and unfairly burdensome. SoCalGas also objects to this request on the grounds that the term “leakage records” is vague and ambiguous, and lacks foundation. Subject to and without waiving these objections, SoCalGas responds as follows: Please see attached, Sierra Club-UCS-SCG-002 Q8 – 15 Herrera – Q8 Data, which contains repair records from 2015-2016 for a leak. The records do not distinguish between the type of equipment, or substance.
- b. SoCalGas objects to this request 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. Leaks are not relevant to this proceeding. SoCalGas further objects to this request to the extent it lacks foundation and assumes facts not in evidence about the requirement to quantify any leaks. Subject to and without waiving these objections, SoCalGas responds as follows: This information is unknown.

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9. Exhibit SCG-23 (Herrera Direct Testimony) at p. CLH-53, Table CLH-25 estimates \$7.175 million in 2017 costs related to Natural Gas Vehicle (“NGV”) Refueling Stations. Please provide actual incurred 2017 costs for this expenditure.

SoCalGas Response 9:

2017 financial information is expected to be available in late Q1 2018.

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10. Exhibit SCG-23 (Herrera Direct Testimony) at p. CLH-53 refers to a request “to upgrade existing NGV stations and plan, design, and build *eight* new NGV refueling stations.” Supporting workpapers (page 118 of SCG-23-CWP) lists 5 new fleet public NGV stations and 14 new fleet NGV stations. Please explain the discrepancy between the 8 new NGV refueling stations identified in page 53 of SCG-23 and the 19 listed in supporting work papers.

SoCalGas Response 10:

There is a total of 8 new Fleet Fueling only NGV stations planned: Alhambra, Belvedere, Downey, La Jolla, Monterey Park, Industry, Simi Valley, Whittier.

There is a total of 11 new Fleet-Public NGV stations planned: Beaumont, Blythe, Branford, Corona, Fontana, Ramona, Redlands, San Luis Obispo, Santa Maria, Valencia, Visalia.

The confidential workpapers in SCG-23-CWP will be updated at the next opportunity to better identify the different categories of stations.

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11. Please provide all analysis supporting the need for each new proposed NGV Refueling Station (e.g., why a refueling station is needed at a selected location, projections of increased demand for refueling locations, etc.).

SoCalGas Response 11:

SoCalGas objects to this request on the grounds that it is unfairly burdensome and overbroad. SoCalGas further objects to this request on the grounds that “all analysis” is vague and ambiguous as to time. Subject to and without waiving these objection, SoCalGas responds as follows:

New NGV stations are prioritized based on the need to support the expanded use of AFV throughout the service territory. In order to increase AFV Fleet vehicles, SoCalGas must install infrastructure to refuel at bases that do not currently have this infrastructure. This entails installation of new NGV stations with time-fill posts that support the refueling of Fleet vehicles overnight. In addition to supporting AFVs assigned to these bases, NGV infrastructure to refuel is put in place to support the expanded reach of AFV and allow for Fleet vehicles to be interchangeable throughout the service territory without the constraint of only being able to assign AFVs to bases where current refueling infrastructure exists. Additionally, Fleet-Public NGV stations are planned based on surveys conducted by the SoCalGas NGV team. The objective is to develop the refueling infrastructure to support SoCalGas Fleet and where possible also support customer fleets converting to NGVs.

Analysis was performed to support the need for new proposed public NGV refueling stations. The analysis reviewed the potential number and fuel use of customer fleets operating within several miles of each SoCalGas operating base and the number and fuel use of utility vehicles at each SoCalGas operating base. SoCalGas operating bases were ranked on the total amount of potential fuel use that could be dispensed by a CNG vehicle refueling station. SoCalGas operating bases with the highest potential fuel use were ranked highest and prioritized for construction. The actual analysis cannot be provided since customer vehicle data used in the analysis was purchased, is proprietary and under the terms of the purchase agreement cannot be provided to 3rd parties.

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12. In SoCalGas Response 2(b) to Sierra Club/UCS-SoCalGas-01, SoCalGas listed vehicle type information under the following categories: 1-1.5 ton Alternative Fuel Vehicle (“AFV”), Class 5 AFV, Full Size AFV, and Pass AFV. Please provide a supplemental response to Q.2(b) that uses the same categories as Table CLH-9 in Exhibit SCG-23 (Herrera Direct Testimony) at p. CLH-19 (automobiles, compact trucks & vans, light duty trucks & vans, medium duty trucks & vans, heavy duty trucks & vans, trailers, and construction equipment).

SoCalGas Response 12:

VEHICLE TYPES	2017 # of Units	2018 # of Units	2019 # of Units
Automobiles	10	10	20
Compact Trucks & Vans	0	0	0
Light Duty Trucks & Vans	128	166	160
Medium Duty Trucks & Vans	139	131	74
Heavy Duty Trucks & Vans	23	15	15
Subtotal over-the-road (OTR)	300	322	269
Trailers	0	0	0
Construction Equipment	0	0	0
Subtotal non-over-the-road (NON-OTR)	0	0	0
Total	300	322	269

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13. In SoCalGas Response 2(b) to Sierra Club/UCS-SoCalGas-01, SoCalGas lists the number of vehicle replacement units by category and replacement year from 2017 through 2019. Please provide the actual number of replacement units in 2017 by vehicle and fuel type. Please provide vehicle type using the same categories as those in Exhibit SCG-23 (Herrera Direct Testimony) at p. CLH-19, Table CLH-9.

SoCalGas Response 13:

SoCalGas objects to this request to the extent it has been asked and answered. SoCalGas further objects to this request on the grounds that it unfairly burdensome. SoCalGas also objects to this request on the grounds that the question is vague and ambiguous and the terms “vehicle replacement units” and “replacement units” are vague and ambiguous. Subject to and without waiving these objections, SoCalGas responds as follows: SoCalGas interprets this data request question to mean number of vehicles placed into service in 2017, that are replacing an existing vehicle. The listing below does not include incremental vehicles placed into service in 2017 that are required by various operating groups to meet business needs.

VEHICLE TYPES	DED CNG	DIESEL	SOLAR	UNLEADED
COMPACT TRUCK VANS				1
LIGHT TRUCK VANS	80			8
MEDIUM DUTY TRUCK	13	24		17
HEAVY DUTY TRUCK		2		
NON MECHANIZED TRAILER			23	
Grand Total	93	26	23	26

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14. Exhibit SCG-23-WP-S (Herrera) does not provide the AFV premium for electric vehicles. Please provide the AFV premium for electric vehicles for each vehicle class listed on p. 1 of Exhibit SCG-23-WP-S (Herrera) and supporting documentation for the stated AFV premium for electric vehicles.

SoCalGas Response 14:

SoCalGas objects to this request on the grounds that it assumes facts not in evidence and lacks foundation. Subject to and without waiving this objection, SoCalGas responds as follows: SoCalGas does not have electric vehicles in the vehicle forecast.

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15. In SoCalGas Response 3(e) to Sierra Club/UCS-SoCalGas-01, which responded to the request for the average annual Operations and Maintenance (“O&M”) for each vehicle class of AFVs, SoCalGas stated it “does not track O&M costs in this manner.” Sierra Club/UCS are seeking information on total cost of ownership for each class of AFVs (in other words also including maintenance, and fuel costs). Please provide the annual cost of ownership for each class of AFV in the manner that SoCalGas tracks these costs.

SoCalGas Response 15:

SoCalGas objects to this request on the grounds that it is vague and ambiguous. Subject to and without waiving this objection, SoCalGas responds as follows: SoCalGas does not track AFVs in the manner requested.

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16. 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. Has SoCalGas compared the cost of CNG as a vehicle fuel with fuel costs for electric vehicles? If so, please provide this analysis.
 - b. Please list the expected new CNG vehicle models SoCalGas is referring to when it references the “expected increase in NGV offerings,” with the year that SoCalGas expects the vehicle model to be available.
 - c. Has SoCalGas compared the “expected increase in NGV offerings” with any expected increase in electric vehicle offerings in the same vehicle category? If so, please provide this analysis.

SoCalGas Response 16:

- 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 outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, SoCalGas responds as follows: Please refer to the direct testimony on behalf of SoCalGas in A.17-01-020/22.
- b. SoCalGas objects to this request on the grounds that it misstates the testimony in Exhibit SCG-20-R; ASC-39. The testimony 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” (emphasis added). Subject to and without waiving this objection, SoCalGas responds as follows: SoCalGas clarifies that NGV offerings includes but is not limited to both existing and new vehicle and engine offerings. Please refer to Exhibit SCG-20 (Cheung), page ASC-40:2-5.

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SoCalGas Response 16 Continued:

- 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 outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, SoCalGas responds as follows: Please refer to the direct testimony on behalf of SoCalGas in A.17-01-020/22.

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17. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-44:14, 17-18 seeks several new Full Time Equivalent (“FTEs”) related to “Clean Transportation Customer Support” to allow “expansion of clean transportation services and products.”

- a. Please define and provide examples of “clean transportation services.”
- b. Please define and provide examples of “clean transportation products.”
- c. Please provide the published job description for the requested FTEs.
- d. Please distinguish the role of SoCalGas FTEs for “Clean Transportation Customer Support” from the role of employees of the private companies selling “clean transportation services and products” (for example, a vendor of NGVs).

SoCalGas Response 17:

- a. As stated in Exhibit SCG-20-R; ASC-36, Clean Transportation Services support “customer demand for and market adoption of natural gas as a transportation fuel in support of California’s GHG reduction goals as set forth in key legislation such as SB 32, SB 350, SB 1383 and related regulations. Clean Transportation Services provide operators of natural gas vehicles (NGVs) and NGV refueling stations, vehicle and equipment manufacturers, government agencies, policymakers, and other stakeholders with account management services, information, education and training related to natural gas clean transportation throughout the service territories of both SoCalGas and SDG&E”. Examples would include, but are not limited to, responding to customer inquiries regarding G-NGV utility bills, customer requests for new gas service for CNG vehicle refueling stations, and/or customer queries regarding new legislation or regulations impacting CNG vehicles and/or CNG vehicle refueling stations.
- b. As described in Exhibit SCG-20-R; ASC-37, Clean Transportation products include utility products such as “new business administration, customer outreach tools and materials, public access compressed natural gas (CNG) station management, and subject matter expertise to implement clean transportation mandates” as well as 3rd party products such as “natural gas products and services including natural gas engines and renewable gas”. Examples include, but are not limited to, the existing Cummins-Westport ISL-G NZ engine, “the first engine to meet the new CARB optional low NOx standard” and the Clean Energy Redeem product that provides fleet and/or station operators with renewable natural gas.
- c. The job descriptions for the requested FTEs are under development and as of the time of this data request have not been published.

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SoCalGas Response 17 Continued:

- d. SoCalGas objects to this request on the grounds that it calls for speculation about the role of employees of the private companies selling “clean transportation services and products.” Subject to and without waiving this objection, SoCalGas responds as follows: The role of SoCalGas’ Clean Transportation Customer Support FTEs are stated in Exhibit SCG-20-R; ASC-37.

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18. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-33:4-16 states: “Customers wishing to develop clean natural gas Distributed Energy Resource (DER) type projects are faced with challenges because of the many policy changes at local, state and federal levels. As such, our customers need guidance and support to help align their energy needs with the current environmental policies. To date the impacts of the policy changes have been managed on a limited basis by CS-I business areas through proceedings such as the Self-Generation Incentive Program, California Solar-Initiative, Customer Incentive Program, Pipeline Safety Enhancement Plan (PSEP), Pipeline Integrity (PI) (maintenance curtailments), Rule 23 (curtailment rule change), and others. However, the number of proceedings that have the potential to impact all customer segments continue to grow. To help consolidate the many policy changes, I am requesting the following: 1 FTE: DER Market Advisor responsible for providing market analysis to Customer Segment Service teams to help develop educational material, customer analysis, and other offerings to support climate change polices.”
- a. Please explain the relevance of each of the listed proceedings (applying current eligibility criteria) to natural gas-powered DERs.
 - b. Please identify the specific “current environmental policies” referred to in the above-quoted passage that SoCalGas believes pertain to natural gas DERs.
 - c. Please describe the “market analysis” that would be provided by the requested DER Market Advisor (*see* p. ASC-33:14).
 - d. Please the list the number of natural gas-powered DER projects deployed in SoCalGas service territory by type and MW for each of the past five years.

SoCalGas Response 18:

- a. SoCalGas objects to this request on the grounds that it is vague and ambiguous as to what Sierra Club/UCS means by the term “applying current eligibility criteria,” and lacks foundation. Subject to and without waiving these objections, SoCalGas responds as follows: The listed proceedings in Exhibit SCG-20-R, ASC-33; 9-11 are examples of programs that have potential impacts to all natural gas customers including those who operate or wish to install natural gas-powered DERs. The relevance of the listed proceedings in regard to natural gas-powered DERs are the following:

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SoCalGas Response 18 Continued:

- i. SGIP requires natural gas-powered DERs to meet eligibility criteria as a contingency to receive monetary incentives.
 - ii. Customer Incentive Program (CIP), filed under A.16-12-010, will require customers to meet eligibility requirements
 - iii. California Solar-Initiative is a service offered by Customer Segment Services
 - iv. Pipeline Safety Enhancement Plan, Pipeline Integrity and Rule 23 (curtailment rule change) have potential to impact the operational schedule of natural gas-powered DERs.
- b. SoCalGas objects to this request on the grounds that it is overly burdensome as to the term “specific current environmental policies.” Subject to and without waiving these objections, SoCalGas provides the following non-exhaustive list of environmental policies that pertain to natural gas DERs:
 - i. Senate Bill 350
 - ii. Integrated Resource Planning
 - iii. Energy Efficiency
 - iv. Renewable Energy
 - v. Transportation Electrification
 - vi. Disadvantaged Communities
 - vii. Assembly Bill 32, Global Warming Solutions Act
 - viii. Senate Bill 32
 - ix. Clean Energy Jobs
- c. Please see Exhibit SCG-20-R, ASC-33: 14-16. The DER Market Advisor will provide Customer Segment Services teams with quantitative and qualitative information regarding utilization, adoption, and penetration of natural gas-powered DERs.
- d. SoCalGas objects 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 outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, SoCalGas responds as follows: Please see below the annual number of

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SoCalGas Response 18 Continued:

natural gas-powered DER projects newly deployed within the SoCalGas service territory, by type and MW, for each of the past five years.

Year	2013	2014	2015	2016	2017
Total Projects	34	19	28	65	51
Fuel Cells	32	13	26	59	44
IC Engines	0	4	2	1	3
Microturbines	0	0	0	4	1
Gas Turbines	0	2	0	1	3
Total MW	13.6	30.2	8.1	45.6	61.2
Fuel Cells	13.6	8.2	7.7	18.6	22.7
IC Engines	0	4.6	0.4	0.6	2.2
Microturbines	0	0	0	4.0	0.2
Gas Turbines	0	18.4	0	22.4	36.1

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19. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-19:3-5 states: “Customer Marketing and Communications team is requesting additional resources to develop and implement strategies in support of climate change policy, enhance awareness of natural gas safety and reliability, and increase communications to disadvantaged communities.”
- a. How many FTEs are currently on the Customer Marketing and Communications team?
 - b. Please provide all marketing materials developed by the Customer Marketing and Communications Team provided to SoCalGas customers in 2017.
 - c. Attached to this data request is a newsletter provided for SoCalGas customers called “The Value of Natural Gas.”
 - i. Does this communication fall within the work of the Customer Marketing and Communications Team? If not, please identify the team at SoCalGas responsible for this newsletter.

SoCalGas Response 19:

- a. In BY 2016 there were 3.0 GRC-funded FTEs in the Marketing and Communications team. FTE information for 2017 will not be available until mid-March 2018.
- b. Pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure SoCalGas objects to this request on the grounds that it is overly broad and unduly burdensome. SoCalGas further objects to this request 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. Subject to and without waiving the foregone objections, SoCalGas responds as follows:

Marketing materials produced by the Marketing and Communications team include, but are not limited to: bill inserts and onserts, flyers, posters, brochures, customer letters, post cards, outdoor signage, informational emails, e-newsletters, video and radio ads, community print ads, paid social media, mobile and digital banners. Given the large volume of marketing materials developed by the Marketing and Communications team, SoCalGas has attached a sample of materials produced in 2017. An index of these samples is provided below:

- i. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample1_Safety Onsert.pdf
- ii. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample2_Safety Form.pdf
- iii. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample3_Safety Insert.pdf

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SoCalGas Response 19 Continued:

- iv. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample4_Safety Brochure.pdf
 - v. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample5_Winter Print Ad.pdf
 - vi. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample6_Winter Brochure.pdf
 - vii. Sierra Club-UCS-SCG-002-Q19b Attachment-Sample7_Safety Social Media.pdf
- c. Yes.

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20. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-34:1, 9-13 cited to D.16-12-043 and requests 1 FTE Project Manager responsible for “managing feasibility studies, contract development, work order agreements, engineering plans, and coordinating with Gas Engineering and Renewable Gas Customer Outreach on project development activities for the interconnection point for bio-methane producers.”
- a. What year does SoCalGas expect to fill this position?
 - b. D.16-12-043 at p. 24 notes that the monetary incentive program is “to encourage biomethane *producers* to design, construct, and to successfully operate biomethane projects that interconnect” (emphasis added). Please explain why an additional FTE is needed to facilitate projects where monetary incentives are already in place for the biomethane producers to design biomethane projects.

SoCalGas Response 20:

- a. SoCalGas expects to fill this position on 1/1/2019.
- b. There has been an increase in interest by biomethane developers to interconnect with SoCalGas’ system. As noted in the testimony cite within this question, an additional FTE is being requested to manage the customer service process and to assist with the successful interconnection of new biomethane projects to the SoCalGas system.

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21. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-34:14-16 seeks a 0.5 FTE Project Specialist “responsible for providing administrative support to the Project Manager and coordinating promotion and demonstration of bio-methane facilities.”
- a. Please explain why the promotion of biomethane facilities should be an expense incurred by SoCalGas ratepayers.
 - b. Please explain how the promotion of biomethane facilities by the requested Project Specialist would be additive to efforts by state agencies or biomethane/renewable gas trade associations.

SoCalGas Response 21:

- a. SoCalGas objects to this request on the grounds that it misconstrues the testimony in Exhibit SCG-20-R at ASC-34. Subject to and without waving this objection, SoCalGas responds as follows: The company is required to implement D.16-12-043, which modified D.15-06-029, and the mandates of SB 840 and AB 2313, and is therefore requesting FTEs necessary to comply with the objectives of the incentive program that SoCalGas is establishing.
- b. SoCalGas objects to this request on the grounds that it misconstrues the testimony in Exhibit SCG-20-R. SoCalGas further objects to this request on the grounds that it calls for speculation about “efforts by state agencies or biomethane/renewable gas trade associations.” Subject to and without waving this objection, SoCalGas responds as follows: Please see response 21a.

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22. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-48:7-8 seeks \$150,000 for a market analysis study “to provide guidance to SoCalGas on the available market and the application of renewable gas.”
- a. Please explain why SoCalGas cannot rely on academic and state agency studies on the renewable natural gas market to understand the available market for renewable gas.

SoCalGas Response 22:

- a. Academic and state agency studies provide a broad analysis of the overall renewable gas market. Renewable gas projects are specialized and unique for each project due to available feedstock, weather, and other conditions not suitable for analysis at a macro level. SoCalGas is not aware of any academic or state agency studies specific to its service territory and unique customer needs and is therefore requesting funding to conduct its own study.

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23. Exhibit SCG-20 (Cheung Direct Testimony) at p. ASC-48 seeks 3 FTEs for the Renewable Gas Customer Outreach group.
- a. How many FTEs are currently in the Renewable Gas Customer Outreach Group?
 - b. Please list all of renewable natural gas projects in California that SoCalGas is aware of that generate biogas available for sale to third parties (e.g., where the biogas is not used for on-site consumption).
 - c. Please provide any specific projections of renewable natural gas growth in California and supporting documentation justifying the need for 3 additional FTEs in the Renewable Gas Customer Outreach group.

SoCalGas Response 23:

- a. Historical FTE information is contained in Exhibit SCG-20-WP, page 61. FTE information for 2017 will not be available until mid-March 2018.
- b. SoCalGas is aware of the following projects in California: Point Loma Wastewater Treatment Plant and the CR&R Pipeline Project (in-progress).
- c. The Renewable Gas Customer Outreach group is forecasting significant new renewable project activity related to dairy resources, elimination of flares at landfill facilities, and diversion of organic waste from landfills. Some examples include:
 1. SB 1383 requires the CPUC to direct the utilities to implement no less than five dairy pilot projects that will connect to the gas utility pipeline (RFP process beginning in 2018).
 2. SB 1383 also establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025.
 3. As a result of the CDFA Dairy Digester Research and Development Program grant funds, there will likely be several other dairy cluster projects connecting to the gas utility pipeline.
 4. Many county owned landfill facilities (located within SoCalGas' service territory) have issued solicitations to the market seeking proposals to utilize their landfill gas (which is currently being flared).