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1. **Facilities** -- In Exhibit SCG-15-CWP, page 12, SoCalGas states, "The current replacement value is routinely updated by SoCalGas Plant Accounting, where the original acquisition or development costs are escalated by a historic construction cost escalation index (the Handy-Whitman Index of Public Utility Construction Costs, the "Handy-Whitman Index").
    a. Please provide the current replacement value from the routine updates by Plant Accounting that best reflect the year-end value for each year from 2009-2014, inclusive.
    b. Please describe in detail the routine updates performed by SoCalGas Plant Accounting, included but not limited to the purpose served by such updates, how often those updates are performed, and the date and results of the most recent routine update.

SoCalGas Response:

a) This is a new forecast methodology, thus the historical information is not readily available. Please see page 12 of the capital workpapers to the prepared direct testimony of Carmen L. Herrera.

b) This request seeks 2014 data. The GRC forecast was developed according to the Rate Case Plan, which does not contemplate the use of 2014 data. Plant Accounting prepares an insurable value report on an annual basis. This report is used by Sempra's Risk Advisory department to provide insurers with an estimated value of SoCalGas' covered property.

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2. **Facilities** --Please provide a complete copy of the responses to ORA-SCG-DR-083-SWC, including all confidential material and all of the Excel files referred to in the responses.

SoCalGas Response:

Please see the accompanying files:

1) ORA-SCG-083-SWC_2014_Recorded_Capital.xlsx

These responses/materials are deemed Protected Materials, Submitted under the signed NDA in this proceeding.

RESPONSES REMOVED DUE TO CONFIDENTIALITY

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3. **Fleet** -- Please provide a complete copy of the responses to ORA-SCG-DR-084-SWC, including all confidential material and all of the Excel files referred to in the responses.

SoCalGas Response:

Please see the accompanying file ORA-SCG-084-SWC_2014_Recorded_OM.xlsx

These responses/materials are deemed Protected Materials, Submitted under the signed NDA in this proceeding. Please see the accompanying files:

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4. **Facilities** -- Do any of the forecasts for Infrastructure & Improvements for SoCalGas (SCG-15, pp. 23-24) include an amount for "unplanned projects" similar to those that appear in the SDG&E forecast for its Infrastructure/Reliability Blanket, as discussed in the response to ORA-SDG&E-DR-021-SWC, question 2? If so, please identify the amount of costs associated with "unplanned projects" recorded in 2009-14, inclusive, and included in the forecasts for 2014-16, inclusive.

SoCalGas Response:

SoCalGas does not have an "Unplanned Project" category similar to that of SDG&E.

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5. **Facilities** --The workpapers for Facility Renovations for Future Requirements in SCG-15-CWP, pp. 16-24, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Facility Renovations for Future Requirements during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility's testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.

SoCalGas Response:

This category did not exist previously; hence no historical cost information is available. Space functionality and changing workforce requirements have mandated updating facilities and maximizing our current footprint.

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6. **Facilities** -- The workpapers for Sustainability Projects in SCG-15-CWP, pp. 25-45, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Sustainability Projects during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility's testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.

SoCalGas Response:

In the production of workpapers, historical expenses are not shown for projects which were forecasted using the zero-based method. In some cases, however, there are historical costs for those or similar projects provided they are not new projects with no expense history, and for the requested project they are as follows:

(In 2013 Thousands of Dollars)					
Project Description	2009	2010	2011	2012	2013
Solar	-	-	-	1,648	134
Water Conservation	-	-	-	-	341
Energy Management System	-	-	-	-	-
Total	-	-	-	1,648	475

Note: Solar and Water Conservation costs for 2012 and 2013 are included in budget code 653 – Infrastructure & Improvement. Also refer to SoCalGas' response to question 25c.

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7. **Facilities** -- Please describe the current status of the PV system installations and Demand Response (DR) control system installations described in SoCalGas's workpapers from the 2012 GRC (SCG-14-CWP, p. 10), and the annual recorded costs for each in 2012-2014, inclusive.

SoCalGas Response:

There are currently three solar PV system installations. The status of the three systems is as follows:

Redlands Headquarters Solar PV System – Redlands' solar PV system is 260 KW AC using 979 Suniva 310 watt Solar Modules. The project was completed in 2013. Redlands solar PV system generates over 400,000 kWh worth of electricity per year.

Palm Desert Base Solar PV System – Palm Desert Base' solar PV system is 48 KW AC using 192 Canadian Solar 310 watt Solar Modules. The project is underway and will be activated in May 2015 with estimated system output at 90,000 kWh per year.

San Dimas Headquarters Solar PV System – San Dimas' solar PV system is 334 KW AC using 1030 Suniva 325-Watt Solar Modules. The project was started in 2014 and will be completed in 2015. The estimated system output is 500,000 kWh per year.

Anaheim Building A & B Solar PV System – Anaheim Building A & B is a 229.8 KW AC (258.3 KW DC) system using 861 LG Electronics Model 300 watt modules. The project was started in 2014 and expected to be completed in 2015. The estimated annual system output will be 434,300 kWh.

The Anaheim solar project was not described in the 2012 GRC. Anaheim site was added due to re-priority of projects.

The status of the Demand Response (DR) control system installations is as follows:

The DR control systems were installed at the following sites, Monterey Park, Pico Rivera, Downey Energy Resource Center, Redlands and Anaheim. The components (hardware and software) were installed in 2014 and now provide automated programming of the buildings lighting and HVAC systems, so that these high energy-consuming sites can better plan for and respond to DR events with an increased capacity to shed electrical load when called for by CAL-ISO and Southern California Edison.

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Response to Question 7 (Continued)

2012 – 2014 Recorded Cost

(In 2013 Thousands of Dollars)				
Project Description		2012	2013	2014
Solar - Relands		1,648	134	-
Solar - Anaheim		-	-	1,143
Solar - San Dimas		-	-	1,185
Solar - Palm Desert		-	-	199
Energy Management System (Various)		-	-	688
	Total	1,648	134	3,215

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8. **Facilities** -- The workpapers for Compliance/Systems Upgrades SCG-15-CWP, pp. 46-79, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as Compliance/Systems Upgrades during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility's testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.

SoCalGas Response:

In the production of workpapers, historical expenses are not shown for projects which were forecasted using the zero-based method. In some cases, however, there are historical costs for those or similar projects provided they are not new projects with no expense history, and for the requested project they are as follows:

	(In 2013 Thousands of Dollars)				
Project Description	2009	2010	2011	2012	2013
Fleet Capital Tool Replacement	144	133	148	134	267

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9. **Facilities** -- The workpapers for NGV Refueling Stations in SCG-15-CWP, pp. 80-90, indicate recorded costs of zero for 2009-2013, inclusive. Did SoCalGas record any costs for activities similar to those described as NGV Refueling Stations during the period from 2009-2013, inclusive? If not, please explain why not. If so, please identify by volume and page number each specific place where those recorded costs appear in the utility's testimony and workpapers, and the amount of costs recorded during each year from 2009-2013, inclusive.

SoCalGas Response:

In the production of workpapers, historical expenses are not shown for projects which were forecasted using the zero-based method. In some cases, however, there are historical costs for those or similar projects provided they are not new projects with no expense history, and for the requested project they are as follows:

(In 2013 Thousands of Dollars)					
Project Description	2009	2010	2011	2012	2013
NGV Refueling Stations	145	852	2,158	1,743	2,613

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10. **Facilities** -- Please describe the current status of the NGV Station infrastructure projects described in SoCalGas's workpapers from the 2012 GRC (SCG-14-CWP, pp. 30-32), and the annual recorded costs in 2012-2014, inclusive.

SoCalGas Response:

Status of NGV Refueling Station Projects:

NGV Infrastructures Improvement	Start Yr	Complete Yr	Comments & Notes
Public NGV Stations			
Azusa Upgrade Project	2011	2013	Compressor and controls upgrade in 2011. Gas Dryer replacement in 2013
Garden Grove Upgrade Project	2012	2013	Compressor, Controls, & Dryer upgrade in 2012. Dispener replacement 2013
Riverside Time Fill Project	2014	2014	Install 38 new time fill hoses and 12 posts
Oxnard Upgrade Project	2010	2011	Station upgrade in late 2010/early 2011
ERC			Defer Project to 2016
Santa Barbara Storage Volume Upgrade	2011	2012	Station is partially complete. Compress & controls upgrade scheduled for 2016
Saticoy Upgrade Project	2011	2013	Compr, controls, Dryer in 2011. Dispenser in 2012/13
Compton Upgrade Project	2011	2012	Compr, controls, Dryer in 2011.
Compton Driveway & Dispensers Upgrade	2014		Drvieway & Dispenser in 2014/15
Pico Rivera	2013		Project start in 2013 and should be completed 2015
San Pedro	2014	2015	To be completed by end 2015
Private NGV Station			
Palm Desert Upgrade Project	2011	2013	Completed
182ND Street Upgrade Project	2014		Compr purchased in 2014 and installed in 2015
Crenshaw compressor Rebuilt	2014	2014	Rebuilt Existing compr
San Bernardino			Defer to 2017
Chino			Defer to 2016
Yukon			Defer to 2017
Huntington Park Upgrade Project	2014		Purchased and installed 2014. Electrical Power upgrade in 2015
Santa Monica			TBD
Anaheim			TBD
Pasadena Time Fill Installation project	2013	2013	Install 5 time fill post and hoses for Large Crew Truck
Canoga Fast Fill Installation Project	2011	2011	Install 1 fast fill post and hose with controls
Portable Compressor (Hurricane Rebuilt)	2014	2014	Rebuilt Existing Portable compr
Proposed New NGV Stations			
Lancaster Installation Project	2012	2013	Install new station and public fueling station
Murrieta Installation Project	2013		Started upgrade in 2013 should be completed 2015.
Station #3			Fontana Station should be the 3rd station scheduled for 2015 and completed 2016

2012 – 2014 Recorded Costs:

(In 2013 Thousands of Dollars)			
Project Description	2012	2013	2014
NGV Refueling Stations	1,743	2,613	2,310

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11. **Fleet** -- At SCG-15, p. 3, footnote 1 refers to "U.S. Department of Energy; EPAct Fleet Information and Regulations." Please identify with specificity each specific document or regulation SoCalGas is referring to with this cite.

SoCalGas Response:

10 CFR Part 490.

http://www1.eere.energy.gov/vehiclesandfuels/epact/pdfs/standard_compliance.pdf
(Standard Compliance: Guidelines to Help State and Alternative fuel Provider Fleets meet Their Energy Policy Act Requirements)

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12. **Fleet** -- At SCG-15, p. 3, SoCalGas states that it plans to buy alternative fueled vehicles at a premium to achieve the 90% annual requirement under the EPAct.
    a. Please describe in detail the analysis SoCalGas performed to compare the costs and benefits of buying alternative fueled vehicles rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.
    b. Please describe in detail the analysis SoCalGas performed to compare the costs and benefits of purchasing EPAct credits rather than NGVs to meet this requirement. Please provide workpapers associated with that analysis.

SoCalGas Response:

a. SoCalGas did not conduct any such analysis. Additionally, in line with California state initiatives to reduce GHG. SoCalGas is supporting this initiative to grow its natural gas fleet by replacing and/or retrofitting traditional gas and diesel vehicles.

b. SoCalGas did not conduct any such analysis.

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13. **Fleet** -- At SCG-15, pp. 4 and 15, SoCalGas states that the Vehicle Servicing & Repairs costs include costs for retrofitting the SoCalGas fleet of over-the-road vehicles with backup cameras and backup sensors to try to help prevent the number of backup incidents.
    a. Please confirm that the costs in Vehicle Servicing & Repairs are for SoCalGas's existing fleet of over-the-road vehicles, and are in addition to the costs of having backup cameras or backup sensors installed in new vehicles.
    b. For each year from 2009-2014, inclusive, please state the number of backup incidents that occurred with the SoCalGas fleet of over-the-road vehicles. Please describe the five most common types of backup incidents, and provide the number of incidents of each type in each year.
    c. For each year from 2009-2014, inclusive, please state the amount of claims paid out by SoCalGas due to backup incidents involving the SoCalGas fleet of over-the-road vehicles.
    d. For each year from 2009-2014, inclusive, please briefly describe the five most common costs incurred by SoCalGas due to backup incidents involving the SoCalGas fleet of over-the-road vehicles, and the amount of each such cost.

SoCalGas Response:

a. The costs for Vehicle Servicing & Repairs are for SoCalGas' existing fleet of over-the-road vehicles, which are in addition to the costs of having backup cameras or backup sensors installed in new vehicles.
b. There are only two types of backup incidents: (1) Hit moving vehicle while backing and (2) Hit stationary object-backing. The numbers are stated below.

Motor Vehicle Incident Event type/Calendar year	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**Overall Result**
Hit moving vehicle while backing	8	3	7	10	4	5	37
Hit stationary object-backing	30	29	24	27	35	30	175
Overall Result	**38**	**32**	**31**	**37**	**39**	**35**	**212**

c. Fleet does not provide or collect this information.
d. Fleet does not provide or collect this information.

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14. **Facilities** -- At SCG-15, page 4, SoCalGas states that Facility Operations is responsible for the operation and maintenance of utility facilities which encompass 1.7 million square feet of 80 manned locations and 26 telecommunications sites. For each year from 2009-2014, inclusive, please provide the year-end amount of square feet, manned locations, and telecommunications sites.

SoCalGas Response:

2009-2012		
	# Sites	Sq. Ft.
Operating Bases	64	868,414
Branch Offices	6	14,598
Multi-Use	6	593,670
Regional HQ	4	239,858
Total	**80**	**1,716,540**

2013		
	# Sites	Sq. Ft.
Operating Bases	64	868,414
Branch Offices	6	14,598
Multi-Use	6	599,670
Regional HQ	4	239,858
Total	**80**	**1,722,540**

2014		
	# Sites	Sq. Ft.
Operating Bases	64	872,584
Branch Offices	6	14,598
Multi-Use	6	599,670
Regional HQ	4	239,858
Total	**80**	**1,726,710**

Response to Question 14 (Continued)

Telecom Site List
Crestline*
Dana Point*
Cactus City Turbine*
Desert Center Microwave*
Whitewater
Mt. David
Garvey Reservoir
Tip Top Ranch
Mt. Solomon
Baldwin Hills
Box Springs
Verdugo Peak
Taft
LaHabra Heights
Mojave Mountain
Chuckwalla Peak
Cactus Ridge
Old Oat Mountain
New Oat Mountain
Water Tower
Sunset Ridge
Sacramento Peak
Double Mountain
Gastro Peak
Pheland
Rodman

* Telecom sites added since 2009.
Square footage from Telecom sites are not
included in the 1.7 million square feet noted above.

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15. **Facilities** -- At SCG-15, pages 4-6, SoCalGas provides a summary of some key activities for the Facilities Operations. For each key activity listed here, please identify and describe in general the five most material changes that have occurred since 2012, and the date each such change went into effect. Please also provide SoCalGas's best estimate of the impact each change has on its forecasted activities and costs for 2014, 2015 and 2016.

SoCalGas Response:

SoCalGas does not maintain the level of detail information necessary to enable it to reconcile the specific cost impact of each of these individual changes.

The following is a summary of five key activities for the Facilities Operations:

a) Provide safe facilities provide Americans with Disabilities Act ("ADA") compliant access to our customers at the branch offices.
Response: *A Memorandum of Understanding (MOU) was established in 2008 to upgrade access to Branch Offices to comply with ADA Regulations. For this particular regulation, SoCalGas spent approximately $22 million.*

b) Various air quality management district's regulating, emergency standby generators, boilers and Heating Ventilation and Air Conditioning ("HVAC") equipment.
Response: *SCG has 9 different Air Quality Management District/Air Pollution Control District within its service territory, one of the largest most stringent is SCAQMD in the L.A. Basin area. SCAQMD has been in existence since 1976 and continues to implement new regulatory requirements. SoCalGas strives to be in compliance with all current and evolving regulations. Specific impacts for SoCalGas' forecast capital request cannot be quantified until a specific project or improvement is underway.*

c) Local Certified Unified Program Agencies ("CUPA"s) regulating hazardous material business plans.
Response: *Hazardous Material Business plans were enacted in 1985 and mandated by the end of 1986. This is an ongoing requirement.*

d) Storm water pollution control regulations addressing cleanliness of our parking lots and potential storm water runoff and discharge from our facilities, such as is required by the Municipal Separate Storm Sewer Systems (MS4) requirements. For more details, see the testimony of SoCalGas Environmental witness Jill Tracy (Ex. SCG-17).
Response: *Several permit requirements will impact future facility operations. Storm Water Prevention and Pollution Plans (SPPP) will need to reflect minimum Best Management Practices (BMP) outlined in permits. Monitoring frequency of storm water run-off will increase from 2 to 4 samples per year. There are potential fines for numeric action levels that exceed what is outlined in best management practices.*

Response to Question 15 (Continued)

e) Other compliance/regulation items include:

1. Reciprocating Internal Combustion Engines / National Emission Standards for Hazardous Air Pollutants ("RICE/NESHAPS") maintenance requirements for our standby emergency generators.
Response: *This is a fairly new regulatory requirement and not established until 2011. Specific impacts for SoCalGas' forecast capital request cannot be quantified until a specific project or improvement is underway.*

2. Air quality management districts and California Occupational Safety and Health Administration ("Cal OSHA"): Asbestos containing building material management.
Response: *The average age of the building in SCG portfolio is 44 years old. Construction material used during this time leaves us vulnerable to regulatory requirements relative to Asbestos Containing Material's and safety for our employees.*

3. Title 22 heavy metal in surface coating compliance. Any construction or disturbance of building materials to comply with Title 22 regulation could be costly.
Response: *Each of these has requirements to regulate employee exposure to lead or other metals with specific exposure limits and program requirements.*

CCR Title 8; Section 1531.1 Lead – went into effect in 1993 and Section 5198 Lead – went into effect in 2000.
CCR Title 8; Section 1532.2 Chromium (VI) – went into effect in 2006.
CCR Title 8; Section 5214 Inorganic Arsenic – went into effect in 1978.
CCR Title 8; 1532 Cadmium – went into effect in 1993.
These are ongoing requirements.

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16. **Fleet** -- At SCG-15, page 8, in Table CLH-4, SoCalGas lists year-end 2013 figures for vehicle types in seven different categories. Please provide the year-end figures for 2008-12 and 2014 for each category of vehicle.

SoCalGas Response:

See the table below:

Number of Vehicles

Vehicle Types	2009	2010	2011	2012	2013	2014
Automobile	323	326	335	377	357	325
Compact Trucks and Vans	584	562	583	619	574	533
Light Duty Trucks and Vans	2,608	2,493	2,564	2,599	2,654	2,567
Medium Duty Trucks and Vans	544	525	544	579	581	611
Heavy Duty Trucks and Vans	80	77	87	82	82	81
Trailers	679	632	715	667	669	705
Construction Equipment	295	342	287	298	287	287
Total	**5,113**	**4,957**	**5,115**	**5,221**	**5,204**	**5,109**

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17. **Fleet --** In the workpapers SCG-15-WP, page 13, the "Incremental Fleet for Business Needs" lists the number of vehicles forecasted for each of five SCG Organizations. For each of the five SCG Organizations:
    a. For each year from 2009-2013 please state the number of FTEs and the number of fleet units.
    b. For 2014, please state the number of incremental fleet units actually leased.

SoCalGas Response:

a. SoCalGas does not maintain vehicle amortization historical costs or FTEs by organizational assignment.
b. All acquired units are leased. There were no "Incremental Fleet for Business Needs" acquired in 2014.

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18. **Fleet --** At SCG-15, page 10, SoCalGas states, "In line with California state initiatives and regional and multi-agency efforts seeking ozone reductions in the range of 70% to 80% in all sectors, including the transportation sector's contribution toward meeting California's GHG goals, SoCalGas is supporting this initiative to grow its natural gas fleet by replacing and/or retrofitting traditional gas and diesel vehicles. See Ex. SCG-15-WP Amortization and supplemental for further detail."
    a. Other than the line item for "Replacements with Alternative Fuel Vehicles (AFV)" on page 11 of SCG-15-WP, please identify by page number each place in SCG-15-WP that provides further detail for the amortization costs associated with SoCalGas's initiative to grow its natural gas fleet.
    b. For each year from 2014-2016, inclusive, please state the number of natural gas vehicles reflected in SoCalGas's forecast for "Replacements with Alternative Fuel Vehicles (AFV) on page 10 of SCG-15-WP. Please also state the number of natural gas vehicles actually obtained in 2014, and the associated recorded amortization cost.
    c. For each year from 2009-14, please state the number of vehicles SoCalGas converted to NGVs, and the associated cost.
    d. For each year from 2009-14, please state the number of new NGVs SoCalGas obtained through purchase or lease, and the associated cost.

SoCalGas Response:

a. The information is included in SCG-15-WP on pages 6 and 7.
b. See the table below:

	2014	2015	2016
Replacements with AFV	350	257	425

There were 160 AFVs obtained in 2014.

c. See the table below:

	2009	2010	2011	2012	2013	2014
NGV Conversions	0	5	50	37	103	116
Amortization Costs		$19,439	$71,561	$358,784	$920,530	$2,178,537

d. See the table below:

	2009	2010	2011	2012	2013	2014
New NGVs	3	26	30	39	92	43
Amortization Costs	$980,664	$1,029,513	$723,702	$744,677	$781,388	$1,502,252

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19. **Fleet --** In the workpapers SCG-15-WP, page 26, SoCalGas provides a Fleet Salvage Forecast Supplemental Workpaper.
    a. For the 3-year average salvage value of $2,495.95, please provide the three years of data for the number of salvage units and the total salvage value recorded.
    b. For 2014, please provide the number of salvage units recorded and the total salvage value from those units. Please exclude any proceeds from 2013 auctions posted in 2014.
    c. For each year from 2009-2013, please state the amount of salvage proceeds recorded from auctions performed in the preceding year (for example, proceeds recorded in 2013 from auctions performed in 2012).
    d. Please identify and briefly describe the three factors that have the greatest material impact on SoCalGas having an average salvage value of approximately $2,500 when SDG&E has an average salvage value of $3,500 during the same period (as indicated on SDGE-16-WP, p. 27).

SoCalGas Response:

a. See SOCALGAS-ORA-DEF-007-SWC answer to question E enclosed.
b. Salvage units recorded: 740
   Salvage value: $2,928 thousand
c. See the table below:

	2009	2010	2011	2012	2013
Salvage Proceeds	$21,585	$184,307	$61,337	$584,991	$0

d. Lines of business: SDG&E's electric business requires more specialized, heavy duty equipment that can be more expensive and therefore have higher salvage value.
   Fleet mix: SoCalGas' Fleet is made up of primarily light duty trucks relative to SDG&E.
   Volume of sales: The larger number of same-type vehicles in an auction can lower overall sales prices per vehicle.

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20. **Fleet --** In the workpapers SCG-15-WP, page 45, SoCalGas includes Forecast Adjustment Details to its Automotive Fuels forecast for 2014, 2015 and 2016 to reflect forecasts of additional vehicles in each of those years.
    a. For each year from 2014-2016, inclusive, of the number of additional vehicles listed in the workpaper, how many are expected to be NGV?
    b. For each year from 2014-2016, how many vehicles in SoCalGas's existing fleet does the utility expect to convert to NGVs?
    c. When SoCalGas uses natural gas as a fuel for its fleet provided from the utility's own refueling facilities, is there a cost for the natural gas used as fuel? If so, please state the price SoCalGas charges itself for natural gas used as a fuel.

SoCalGas Response:

a. None of these vehicles were identified as NGV.
b. The NGVs that will be acquired are the AFVs listed in SCG-15-WP on page 11.
c. No, there are no charges to Fleet for the cost of natural gas used as fuel.

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21. **Facilities** -- At SCG-15, page 20, Table CLH-9 shows Shared Facility Operations O&M costs for 2013 (adjusted-recorded) and 2016 (estimated). In the 2012 GRC, at SCG-14, page 8, Table SCG-DGT-4 shows Shared Facility Operations O&M costs for 2009 (adjusted-recorded) and 2012 (estimated).
    a. Please identify and briefly describe all cost categories that were included in the 2012 Shared Facility Operations O&M costs but omitted from the 2016 Shared Facility Operations O&M costs.
    b. Please identify and briefly describe all cost categories that were included in the 2016 Shared Facility Operations O&M costs but omitted from the 2012 Shared Facility Operations O&M costs.

SoCalGas Response:

a) The following costs were included in 2012 Shared Facility Operations O&M costs but omitted in 2016 Shared Facility Operations O&M costs.

1) In the 2012 GRC, GCT janitorial expenses were forecasted in a shared facility cost center. In the 2016 GRC, GCT janitorial expenses are sponsored by Jim Seifert (SCG-16).

2) The facility work management function is no longer shared. In the 2016 GRC, costs associated with this function were forecasted under a non-shared workpaper.

3) Non SoCalGas employees no longer participate in the transportation subsidy program in the 2016 GRC.

b) There were no cost categories in the 2016 Shared Facility Operations O&M costs that were omitted from 2012 request.

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22. **Facilities** -- In the workpapers SCG-15-CWP-FAC, page 8, for the category "Infrastructure & Improvements" SoCalGas includes adjustments in each year from 2009-13 described as, "Adjustment to add back SoCalGas Inter-Comp Receiving Billing Orders." Please describe in detail the "SoCalGas Inter-Comp Receiving Billing Orders." Please also explain why the amounts with this description vary from $15.3 million to ($0.257) million during the 2009-2013 period.

SoCalGas Response:

SoCalGas Inter-Comp Receiving Orders are real internal orders created to receive costs performed by affiliates on behalf of SoCalGas or from shared service activities benefiting SoCalGas. Facility Operations was a shared service organization during the 2009 - 2011 timeframe, which explains the significant activities billed from SDGE during that period.

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23. **Facilities** -- At SCG-15, page 23, Table CLH-11 includes a capital expenditure category of "Infrastructure & Improvements." In the 2012 GRC, at SCG-14, page 13, Table SCG-DGT-5 includes a capital expenditure category of "Infrastructure & Improvements Blanket."
    a. Please identify and briefly describe all categories or types of costs that were included in the 2012 Infrastructure & Improvements Blanket but omitted from the 2016 Infrastructure & Improvements category.
    b. Please identify and briefly describe all categories or types of costs that were included in the 2016 Infrastructure & Improvements category but omitted from the 2012 Infrastructure & Improvements Blanket.

SoCalGas Response:

a) None
b) None

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24. **Facilities** -- At SCG-15, page 23, Table CLH-11 includes a capital expenditure category of "Facility Renovation for Future Requirements."
    a. Was there a similar capital expenditure category in the 2012 GRC for SoCalGas? If so, please identify with by volume and page number each place in SoCalGas's testimony and workpapers from the 2012 GRC that addressed such capital expenditures.
    b. For the types of activities covered by the "Facility Renovation for Future Requirements" category, please state by year the total capital expenditures incurred by SoCalGas during the 2009-13 period, inclusive.
    c. Please state the recorded amounts in the "Facility Renovation for Future Requirements" category for 2014.

SoCalGas Response:

a) No.
b) None.
c) None.

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25. **Facilities** -- At SCG-15, page 23, Table CLH-11 presents five categories of capital expenditures for Facility Operations. In SoCalGas's testimony from the 2012 GRC, the utility presented approximately sixteen separately-stated categories of facility capital projects (2012 GRC SCG 14, p. 13, Table SCE-DGT-5).
    a. Please cross reference each of the categories from the 2012 GRC testimony with the five categories presented in the 2016 GRC testimony.
    b. For each of the categories identified in the 2012 GRC testimony, please provide the recorded capital costs for each year from 2009-2014, inclusive.
    c. For each of the five categories identified in the 2016 GRC testimony, please provide the recorded capital costs for each year from 2009-2014, inclusive.

SoCalGas Response:

a. See the table below for cross reference between 2012 vs. 2016 categories.

Budget Code	2012 GRC	2016 GRC
653	Infrastructure & Improvements Blanket	Infrastructure & Improvements
653	Anaheim Building A Chiller	Infrastructure & Improvements
653	Compton Parking Lot	Infrastructure & Improvements
653	Downey ERC Chiller Replacement	Infrastructure & Improvements
653	Facilities Energy Efficiency Projects	Sustainability Projects
653	MPK Bldg A Server Room Air Handler	Infrastructure & Improvements
653	MPK Data Center Master Plan	Major Capital Project
653	MPK Data Center Generators	Infrastructure & Improvements
653	MPK Exterior Site Improvements	Infrastructure & Improvements
653	Redlands HQ Parking Lot	Infrastructure & Improvements
653	Spence St. Remodel	Infrastructure & Improvements
653	703 Environmental Safety Blanket	Infrastructure & Improvements
654	Branch Office ADA and Ergonomics	Infrastructure & Improvements
697	GCT Lease Renegotiation TIs	Major Capital Project
734	NGV Refueling Stations	NGV Refueling Stations
NA	Various other projects less than $1mil[1]	Infrastructure & Improvement / Compliance/Systems Upgrades

[1] The projects in this group are mostly infrastructure & Improvements with the exception of the Fleet Capital Tools project which was included here in the 2012 GRC. The Fleet Capital Tools project is included in Compliance/Systems Upgrades in the 2016 GRC.

b. See the table below for 2019 – 2014 recorded cost for the budget codes identified in 2012 GRC testimony.

Budget Code	Description	2009	2010	2011	2012	2013	2014
653	Infrastructure & Improvements	12,884.00	18,910.00	16,984.00	25,364.00	20,690.00	24,327.00
654	Branch Office ADA and Ergonomics	5,740.00	5,247.00	3,065.00	949.00	47.00	-
697	GCT Lease Renegotiation	-	1,971.00	30,272.00	5,657.00	25.00	(6.00)
734	NGV Refueling Station	145.00	852.00	2,158.00	1,743.00	2,613.00	2,310.00
N/A	Various Other projects less than $11mil	144.00	133.00	148.00	135.00	267.00	202.00
	Total	18,913.00	27,113.00	52,627.00	33,848.00	23,642.00	26,833.00

Response to Question 25 (Continued)

c. See the table below for 2019 – 2014 Recorded Costs for the categories identified in 2016 GRC testimony. There are no recorded costs for Facility Renovation for Future.

Description	2009	2010	2011	2012	2013	2014
Infrastructure & Improvements [1]	12,731	18,102	16,457	15,763	19,322	19,871
Sustainability Projects	0	0	0	0	0	4,456
Compliance/Systems Upgrades	144	133	148	135	267	862
NGV Refueling Stations	145	852	2,158	1,743	2,613	2,310
Total	13,020	19,087	18,763	17,641	22,202	27,499

[1] Infrastructure & Improvements included Solar and Water Conservation costs of $1.6M and $0.5M in year 2012 and 2013 respectively.

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26. **Facilities** -- At SCG-15, page 25, SoCalGas describes its forecast method for Infrastructure & Improvements. The testimony refers to a International Facility Management Association (IFMA) benchmarking study conducted in 2012, and describes how information from that study was applied to the cumulative replacement value. In the workpapers SCG-15-WP, pp. 13-15, SoCalGas presents data for which the source is indicated as "IMFA Utility Council Benchmarking."
    a. For the "current year capital renewal/GSF" figures on page 13, what is the "current year"?
    b. For the "five year average capital renewal/GSF" figures on page 13, what years are included in the "five year average"?
    c. The renewal/GSF figure on page 13 of the workpapers reflects a subset of the companies listed on pages 14-15. Was this subset created by SoCalGas or IFMA?
    d. Please identify and explain each criterion used to determine if a company included on the lists on pages 14-15 would be included in the list on page 13 of the workpapers.
    e. The companies listed on pages 14-15 lists by code from U01 to U78, but omits a number of codes and the company associated with that code (see, for example, the jump from U22 to U25, and from U31 to U34). Was the list of companies and codes on pages 14-15 as provided by IFMA, or did SoCalGas remove some of the companies and codes from material provided by IFMA.
    f. Please provide the full list available to SoCalGas of the utility companies used in the IFMA benchmarking study referred to in the SoCalGas testimony and workpapers, and the "current year capital renewal/GSF" and "five year average capital renewal/GSF" for each. Please provide the data in working Excel format.
    g. Please identify and explain each criterion used to determine if a company and its code would be included in the list on pages 14-15 of the workpapers.
    h. SoCalGas and SDG&E are each identified by a code on the list on pages 14-15 (U58 and U60, respectively) but do not have renewal/GSF figures for either the "current year" or the "five year average." For each utility, please provide the "current year capital renewal/GSF" and the "five year average capital renewal/GSF" for 2013 and 2009-13, respectively. Please also provide supporting workpapers.

SoCalGas Response:

a. Current year is 2012.
b. 2007 – 2011
c. Subset by IFMA
d. Yes, the lists are identical, and the criterion was determined by IFMA.
e. This reflects the list as provided by IFMA. Also see attached file Turn-SCG-11_Q26f_IFMA.xlsx.

Response to Question 26 (Continued)

f. See accompanying file Turn-SCG-11_Q26f_IFMA.xlsx.
g. IFMA sponsored and conducted this independent study.
h. SoCalGas did not participate in the study.

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27. **Facilities** -- At SCG-15, page 25, SoCalGas describes its forecast method for Infrastructure & Improvements, and describes it as "most appropriate because it is based on industry standards and reputable industry benchmarking index."
    a. Please identify each other method SoCalGas considered in deciding which forecast method would be appropriate for this purpose in this GRC, and the reason for deciding that the adopted method was more appropriate than the other method considered but not selected.
    b. Is SoCalGas aware of other utilities that prepare cost forecasts for ratemaking purposes by relying on the IFMA-developed index to select a capital renewal rate to apply to the current replacement value to determine the forecasted amount? If so, please identify each such utility and briefly describe when and for what ratemaking purpose the utility has prepared costs forecasts in this manner.

SoCalGas Response:

a) SoCalGas did not consider any other methods.
b) No.

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28. **Facilities** -- In the workpapers SCG-15-WP, page 19, SoCalGas describes the non-labor cost estimates for its Facility Renovations for Future Requirements projects as being "based on unique and specific scope requirements and professional expert judgment, including vendor estimates from qualified industry professionals such as licensed architects and designers, construction industry professionals, facility management professionals, and IT domain experts." For each of the four projects presented in this category (Chatsworth, Compton, Pico Rivera and Anaheim), please provide the following information:
    a. Identify by volume and page number of SoCalGas's prepared testimony and workpapers all places that provide further detailed information regarding the basis of the forecast for each project (other than the workpapers at pages 21-24).
    b. The unique and specific scope requirements.
    c. All documentation of vendor estimates or other input from qualified industry professionals.
    d. The number of SoCalGas FTEs based at the facility before the renovation.
    e. The number of SoCalGas FTEs estimated to be based at the facility after the renovation.

SoCalGas Response:

a. ***These responses/materials are deemed Protected Materials, Submitted under the signed NDA in this proceeding. Please see the accompanying files:*** **RESPONSE REMOVED DUE TO CONFIDENTIALITY**

b. ***These responses/materials are deemed Protected Materials, Submitted under the signed NDA in this proceeding. Please see the accompanying files:*** **RESPONSE REMOVED DUE TO CONFIDENTIALITY**

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29. **Facilities** -- At SCG-15, pages 27-28, the testimony describes sustainability projects that include installation of "solar systems at various facilities to generate renewable energy from solar photovoltaic panels…." In the 2012 GRC, at SCG-14, page 16, the testimony described facilities renewable energy efficiency projects that included installing "Rooftop PV systems at various sites to support federal, state, and company renewable energy initiatives, as well as save electric demand, energy and costs."
    a. For each year from 2010-2014, inclusive, please state the amount SoCalGas recorded on capital expenditures for solar photovoltaic systems, and identify each site at which such systems were installed.
    b. Please provide a copy of the "company renewable energy initiatives" that were in effect at the time SoCalGas submitted its 2012 GRC application and supporting testimony.
    c. Please provide a copy of the current "company renewable energy initiatives."

SoCalGas Response:

a) See table below or 2010 – 2014 recorded costs.

(In 2013 Thousands of Dollars)					
Site	2010	2011	2012	2013	2014
Relands	-	-	1,648	134	-
Anaheim	-	-	-	-	1,143
San Dimas	-	-	-	-	1,185
Palm Desert	-	-	-	-	199
Total	-	-	1,648	134	2,528

Note: Solar and Water Conservation costs for 2012 and 2013 are included in budget code 653 – Infrastructure & Improvement. Also refer to SoCalGas' question 25c.

b) SoCalGas did not have a formal facility renewable energy plan at the time of the 2012 GRC filing.

c) SoCalGas' formal facility renewable energy plan is to meet the new State energy conservation mandate provided by Governor Jerry Brown.

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30. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP:
    a. What is the difference between Fleet Replacements 2014 through 2016 and Replacements with Alternative Fuel Vehicles (AFV) in the Amortization table?
    b. Please provide in Excel format the annual costs, recorded for each year 2009-2014 and forecasted for 2014-2016, for each line item in the Amortization table. Please also provide the annual costs for each year broken out into the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage.
    c. Please provide in Excel format the number of units associated with each line in the Amortization table on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016. Please also provide the annual number of units for each year broken out into the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage.
    d. Please separate the "New Fleet Units for Replacements" from the Fleet Replacements table into annual figures on a recorded year-end basis for each year 2005-2014, and forecast basis for each year, 2014-2016, for the following separate categories: Gas Distribution, Gas Engineering, Gas Transmission, Field Services-CS Field, CS Operations-Meter Reading, and Storage. Within each category, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.
    e. For each of the SCG Organizations listed in the Incremental Fleet for Business Needs table, please provide the recorded fleet units on a recorded year-end basis for each year 2005-2014. Within each organization, please indicate the number of units each year that are gasoline- or diesel-fueled vehicles, and the number of units that are Alternative Fuel Vehicles.

SoCalGas Response:

a. The category "Fleet Replacements" does not include AFVs, which are all included in the category called Replacements with AFVs.
b. Please see the accompanying file SCG-DR-11_Question 30b.xlsx. SoCalGas does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. The historical amortization costs are included in SCG-15-WP on page 5.
c. SoCalGas does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. The historical amortization costs are included in SCG-15-WP on page 5.

Response to Question 30 (Continued)

d. SoCalGas does not maintain the purpose of purchase, nor the designated organization for historical amortization costs. This type of separation is only available for future forecasts, which has been provided in the referenced workpaper. See answer to Question 16 for historical counts.
e. SoCalGas does not maintain vehicle amortization historical costs by organizational assignment. Forecasts were developed by vehicle type and not by organization.
f. SoCalGas does not maintain vehicle amortization historical costs by organizational assignment. Forecasts were developed by vehicle type and not by organization.

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31. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP:
    a. For the vehicle replacements SoCalGas is forecasting, are any occurring earlier than they would otherwise in order accelerate adding AFVs to the utility's fleet?
    b. If so, for each year from 2014-2016, inclusive, please indicate how many vehicles are forecast to be replaced (i.) one year, (ii.) two years, (iii.) three years, (iv.) four years, (v.) five or more years earlier than would occur absent adding AFVs to the utility's fleet.
    c. What is SoCalGas's understanding of what would happen to the vehicles that would be replaced on an accelerated schedule, if any? Would they be demolished? Sold? Something else? To whom would they be sold if selling is the likely course of action?

SoCalGas Response:

a. No.
b. Not applicable.
c. Not applicable.

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32. **Fleet** -- Regarding Table CLH-5 at SCG-15, page 13,
    a. Please provide a workpaper that shows the calculation of and assumptions used to arrive at the recorded and forecasted Automotive Fuels calculations, including (but not limited to) the number of cars, the cost of fuel (both spot and hedged), and fuel efficiency assumptions in the calculations.
    b. What is the average fuel economy (miles/gallon) of SoCalGas's current fleet of road-based vehicles? What is SoCalGas's assumption about the average fuel economy (miles/gallon) of road-based vehicles in the Test Year? What does SoCalGas base the fuel-economy values on? Does the Test Year assumption include any improvement for increased AFV counts? Why or why not?

SoCalGas Response:

a. The 3-year historical average was used for all vehicles and a fuel cost per vehicle was added to the 3-year historical average for all "Incremental Fleet for Business Needs" as specified in SCG-15-WP page 45.

   The fuel cost per vehicle used for "Incremental Fleet for Business Needs" was calculated as follows:

2013 Test Year Fuel Purchases	= $12,360 thousand
2013 Test Year Vehicle Count	= 5,260 total units
Cost per vehicle = $12,360 thousand/5,260 units	= $2.350 thousand

b. SoCalGas does not have this data at this time as the utility is in the prcess of updating its software. At the completion of this upgrade, SoCalGas will have this data available. SoCalGas did not base any analysis on miles/gallon. The fuel forecast was based on a 3-year historical average, as specified in SCG-15-WP on pages 44 through 48. The Test Year assumption did not consider changes for increased AFV counts because the AFV vehicles will come in at the end of the 2014-2016 GRC periods and after, so the improvement in fuel will be more impactful after 2016.

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33. **Fleet --** Regarding the Amortization Forecast Supplemental Workpaper at p. 11 of SCG-15-WP, and the "Incremental Fleet for Business Needs" showing 287 vehicles in the 2014-16 period for Field Services – CS Field and CS Operations – Meter Reading:
    a. Please provide specific documentation from SoCalGas's AMI cost-benefit analysis and calculation of AMI benefits in $/meter/month that demonstrates that employees in CS Field and CS Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2016.
    b. Please provide specific documentation from any AMI cost-benefit analysis that SoCalGas performed to support Advice Letter 4110 that includes a calculation of AMI benefits in $/meter/month that demonstrates that employees in CS Field and CS Operations that will be replaced by AMI (e.g., meter readers) were assumed to get new cars in any year, 2014-2018.
    c. Please identify by volume and page number where the explanation for the reasonableness of the forecast for CS Field and CS Operations – Meter Reading vehicle needs for 2014-16 is set forth.

SoCalGas Response:

Please refer to pages CLH-6 through CLH-7 of testimony (Ex. SCG-15) for discussion of the treatment of AMI costs and benefits in SoCalGas' Test Year 2016 GRC. Fleet receives requests for incremental new vehicles and is responsible for the cost estimates. The Fleet user is responsible for the business justification.

Prepared by Rene F. Garcia, Witness for SoCalGas Advanced Meter Policy

a. SoCalGas understands Question 33.a and 33.b to be requesting the assumptions related to projected benefits related to Customer Services Field and Meter Reading vehicles as presented in the AMI Business Case. Additionally, SoCalGas assumes that Question 33.b was referring to years 2014-2016.

   Benefits associated to avoided vehicle costs were forecasted in the AMI Business Case using the same methodology that was applied in the GRC, where activities driven by meter growth were used as a baseline to calculate costs.[1] Those costs were used to determine cost avoidances (or benefits) in the Customer Service Field and Meter Reading areas. As a result of AMI automation, there is a cost avoidance related to incremental vehicles, mileage reimbursement and fleet vehicle costs in the Customer Services Field and Meter Reading areas.

   Workpapers supporting the benefit calculation for vehicles may be found in the Errata Workpapers for Mark L. Serrano's testimony, provided in the attachment

[1] Meter growth is a factor used to forecast order volumes, FTEs, and vehicles.

Response to Question 33a (Continued)

"TURN-SCG-DR-11-Q33_Attachment 1_Mark L. Serrano Workpapers.pdf." For Customer Service Field related avoided vehicle costs, please refer to pages 30-32, line 10. For Meter Reading related avoided vehicle costs, please refer to pages 104-106, lines 8 and 20. These values are presented in 2008 direct dollars.

As discussed in witness Rene F. Garcia's testimony, Ex. SCG-39, each witness impacted by AMI deployment has presented testimony excluding operational costs and benefits presented in SoCalGas' AMI business case and approved in Decision ("D.") 10-04-027. Hence, TY 2016 GRC forecasts assume continuing operations without AMI in all impacted business areas. O&M benefits achieved or attributed to AMI as defined in the benefit per meter mechanism authorized in D.10-04-027 and established in SoCalGas' Advice Letter ("AL") 4110 have been included in AMI revenue requirements and therefore excluded from TY 2016 GRC estimated expenses.

b. Please see the response provided to Question 33.a.

Prepared by Sara Franke, Witness for SoCalGas Customer Services Field and Meter Reading

c. An explanation of the need for the forecasted incremental 287 vehicles in the 2014 – 2016 time period can be found in the direct testimony of witness Sara Franke, Ex. SCG-10. The request for 287 incremental vehicles is driven by multiple factors within the SoCalGas Customer Services Field ("CSF") organization. No incremental vehicles are being requested for Meter Reading. For a breakdown of the 287 incremental vehicles please see the table below. "AMI Impacted Activities" are those that are associated with two CSF work order types (i.e., Change of Account Turn-on (Not Entered) and Change of Account Close (Soft)) that will be eliminated as a result of AMI deployment. Detailed explanations of the drivers for the vehicle forecast can be found in Ex. SCG-10 (pages SAF-5 through SAF-24 for CSF – Operations, and pages SAF-24 through SAF-25 for CSF – Supervision).

Incremental Vehicles	CSF – Operations	CSF – Supervision	Total
AMI Impacted Activities	23	2	25
Non-AMI Impacted Activities	241	21	262
Total	264	23	287

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34. **Facilities** -- Regarding Table CLH-11 on p. CLH-23 of the SCG-15:
    a. Why are the 2015 and 2016 values for NGV Refueling Stations different than the figures that appear at Table CLH-11 of 'ORA Request 4_B summary SCG.xlsb' (line 00734A)? Please reconcile the difference and identify the correct values.
    b. Regarding Sheet SCG-15 in 'ORA Request 4 B summary.xlsb', please provide the recorded 2014 values associated with each line item.

SoCalGas Response:

a) The numbers in the "ORA Request 4_B summary SCG.xlsb" file were from the GRC NOI, which did not include fleet expansion stations filed with the Application. The numbers in Table CLH-11 are the correct values.

b) Please refer to "2014 Recorded Capital Expenditures - SCG.xlsx" file provided to ORA on March 6 2015.