Exhibit Reference: SCG-23, Testimony and Workpapers SoCalGas Witness: Herrera Subject: Fleet

Please provide the following:

1. Referring to Ex. SCG-23 testimony Pg. CLH-19, Table CLH-9, please answer/provide the following:

a. A breakout by vehicle type similar to Table CLH-9 for the forecast period 2017 to 2019.

b. A breakout by vehicle type similar to Table CLH-9 for historic 2015.

c. In conjunction with answering a. and b. above, provide the retirements/salvage by vehicle type that will show net additions or subtractions for the years 2009 to 2019.

SoCalGas Response 1:

a.

SoCalGas Vehicle Types Acquisition Plan by Year							
VEHICLE TYPES 2017 2018 2019							
1. AUTOMOBILES	120	14	48				
2. COMPACT TRUCK & VANS	101	90	125				
3. LIGHT TRUCK & VANS	215	268	407				
4. MEDIUM DUTY TRUCK	78	72	112				
5. HEAVY DUTY TRUCK	3	1	24				
6. MECHANIZED TRAILER	15	11					
7. NON MECHANIZED TRAILER	96	64	12				
8. P.O.E. / M.W.E.	40	73	6				
Grand Total	668	593	734				

During the process of preparing this data request SoCalGas discovered an error in the vehicle counts listed in SCG-23 workpaper 2RF003.001 pages 6-7 and page 12 and 2RF003.002, pages 18-19; financial estimates remain accurate as only vehicle counts were transposed as part of text edits. The workpaper incorrectly stated the number of ATCM vehicles, AFV vehicles, and replacement vehicles by year. The workpaper will be corrected at the next opportunity. The table in response 1a above correctly states the number of planned vehicles acquisitions by year. The table above represents all planned acquisitions for the forecast period 2017 - 2019, inclusive of replacements, ATCM, AFV, and incremental vehicles for various operating groups; this list does not include vehicles currently under purchase order.

SoCalGas Response 1:-CONTINUED

b.

SoCalGas Vehicle Types (Year-End 2015)					
VEHICLE TYPES	No. of Units				
1. AUTOMOBILES	299				
2. COMPACT TRUCK & VANS	474				
3. LIGHT TRUCK & VANS	2,494				
4. MEDIUM DUTY TRUCK	573				
5. HEAVY DUTY TRUCK	77				
6. MECHANIZED TRAILER	110				
7. NON MECHANIZED TRAILER	572				
8. P.O.E. / M.W.E.	274				
Grand Total	4,873				

c.

	ACQUIRED UNITS BY TYPE AND YEAR								
									Grand
VEHICLE TYPES	2009	2010	2011	2012	2013	2014	2015	2016	Total
1 - AUTOMOBILE	8	26	30	46	19	1	13	117	260
2 - COMPACT									
TRUCK/VAN	41	7	100	47	16	46	31	78	366
3 - LIGHT TRUCK/VAN	197	102	290	137	321	256	20	546	1,869
4 - MEDIUM DUTY									
TRUCK	50	4	50	67	110	70	4	18	373
5 - HEAVY DUTY									
TRUCK	19	1	16	3	9	22			70
6 - MECHANIZED									
TRAILER		3	15		13	14	1		46
7 - NON MECHANIZED									
TRAILER	27	1	217	6	29	77	6	4	367
8 - P.O.E.		52	46	20	5	14		19	156
Grand Total	342	196	764	326	522	500	75	782	3,507

SOLD UNITS BY TYPE AND YEAR									
									Grand
VEHICLE TYPES	2009	2010	2011	2012	2013	2014	2015	2016	Total

SoCalGas Response 1:-CONTINUED

1 - AUTOMOBILE	17	23	21	4	39	43	21	52	220
2 - COMPACT									
TRUCK/VAN	51	29	79	11	61	104	44	61	440
3 - LIGHT TRUCK/VAN	372	217	219	102	266	378	44	284	1,882
4 - MEDIUM DUTY									
TRUCK	65	23	31	32	107	58	25	16	357
5 - HEAVY DUTY									
TRUCK	19	4	6	8	9	25	2	1	74
6 - MECHANIZED									
TRAILER	5	36	41	6	18	20	6	7	139
7 - NON MECHANIZED									
TRAILER	5	15	108	50	23	61	10	4	276
8 - P.O.E.	3	5	101	9	23	20	7	7	175
Grand Total	537	352	606	222	546	709	159	432	3,563

D	DELTA UNITS BY TYPE AND YEAR									
									Grand	
VEHICLE TYPES	2009	2010	2011	2012	2013	2014	2015	2016	Total	
1 - AUTOMOBILE	(9)	3	9	42	(20)	(42)	(8)	65	40	
2 - COMPACT										
TRUCK/VAN	(10)	(22)	21	36	(45)	(58)	(13)	17	(74)	
	(175	(115				(122				
3 - LIGHT TRUCK/VAN))	71	35	55)	(24)	262	(13)	
4 - MEDIUM DUTY										
TRUCK	(15)	(19)	19	35	3	12	(21)	2	16	
5 - HEAVY DUTY										
TRUCK	-	(3)	10	(5)	-	(3)	(2)	(1)	(4)	
6 - MECHANIZED										
TRAILER	(5)	(33)	(26)	(6)	(5)	(6)	(5)	(7)	(93)	
7 - NON MECHANIZED										
TRAILER	22	(14)	109	(44)	6	16	(4)	-	91	
8 - P.O.E.	(3)	47	(55)	11	(18)	(6)	(7)	12	(19)	
	(195	(156				(209				
Grand Total))	158	104	(24))	(84)	350	(56)	

2. Referring to Ex. SCG-23 testimony Pg. CLH-20 Line 7-8, ORA noted \$17.727 million (or 50%) of the 2019 amortization forecast total (note: questions will also pertain to other costs as well) is for committed financing of existing vehicles and replacements currently under purchase order. Based on this, please answer/provide the following:

- a. A listing by vehicle type of the number of existing vehicles, and their age.
- b. A listing by vehicle type of the number of replacements under purchase order.
- c. For each vehicle type the associated amortization, interest, salvage, license fees, and sales tax that ties to the 2017-2019 forecast.
- d. For the replacements, please confirm they are due to the age of the vehicles. Provide a listing of replacements under purchase order showing type of vehicle being replaced, its actual age and mileage, the vehicle it is replacing and the associated cost of the vehicle.

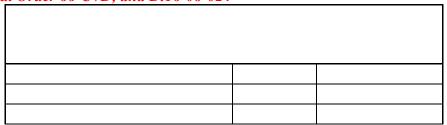
SoCalGas Response 2:

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SoCalGas Vehicle Types (Current)						
VEHICLE TYPES	No. of Units	Average Age (Months)				
1 - AUTOMOBILE	353	73				
2 - COMPACT TRUCK/VAN	499	85				
3 - LIGHT TRUCK/VAN	2,636	72				
4 - MEDIUM DUTY TRUCK	581	87				
5 - HEAVY DUTY TRUCK	75	81				
6 - MECHANIZED TRAILER	78	119				
7 - NON MECHANIZED TRAILER	505	103				
8 - P.O.E.	249	108				

The table above represents the current Fleet; please note that not all vehicles are currently under lease. See detailed list of current vehicles with information request in table ORA-SCG-035-LMW-DATA, tab ORA_2A (attached). Age and mileage is listed in months at the time of this response.

b. This response contains Confidential information pursuant to PUC Code Section 583 & General Order 66-C /D, and D.16-08-024



SoCalGas Response 2:

The table above does not include ATCM units under purchase order; ATCM units under purchase order are included in the ATCM category.

See detailed list of vehicles under purchase order with information request in table ORA-SCG-035-LMW-DATA, tab ORA_2B_Detail (attached). Age and mileage is listed in months at the time of the forecast, YE 2016.

- **c.** The forecast model does not break-out the amortization, interest, salvage, license fees, and sales tax by vehicle type. The forecast model provides forecast in each of the presented groupings listed in the workpapers SCG-23 2RF003.001 2RF003.004; ATCM required replacements, incremental vehicles for business needs, AFV premium, and existing vehicle replacements due to replacement criteria being met.
- **d.** Replacements are due to either 1) Compliance requirements (ATCM or other), 2) Age of vehicle, 3) Mileage of vehicle, or 4) Condition of vehicle. The vehicles being replaced by vehicles under purchase order are being replaced due to one or more of the criteria being met. See detailed list of vehicles under purchase order with information request in table ORA-SCG-035-LMW-DATA, tab ORA_2B_Detail (attached). Age and mileage is listed in months at the time of the forecast, YE 2016.

3. Referring to Ex. SCG-23 testimony Pg. CLH-20 Line 11-13, ORA noted \$4.468 million (or 13%) of the 2019 amortization forecast total (note: questions will also pertain to other costs as well) is state mandated (ATCM) replacements. Based on this, please answer/provide the following:

a. A list of the new vehicles (subject to this mandate) broken out by year (2017- 2019), by vehicle type, and expected cost per vehicle.

b. For each vehicle type the associated amortization, interest, salvage, license fees, and sales tax that ties to the 2017-2019 forecast.

c. Typically are the new vehicles more expensive than the replaced vehicles? If yes, on average by how much?

d. A list of vehicles, by year (forecast 2017-2019), by type, and their representative age that are being replaced by these new vehicles.

e. Will the purchase of these new vehicles increase the net size of SCG's fleet? If yes, by how many?

f. When the State mandated (ATCM) regulatory requirements start and when do they end?

g. For the number of vehicles in SCG's fleet subject to this mandate, what percentage will be replaced in the forecast period that meets this mandate?

h. In the event SCG does not replace the vehicles subject to the ATCM requirements, that will the impact be on the ratepayers (e.g. fines), and the dollar cost of those impacts?

SoCalGas Response 3:

a.

SoCalGas Vehicle Types ATCM Replacements						
VEHICLE TYPES	2017	2018	2019			
4. MEDIUM DUTY TRUCK	16	21	76			
5. HEAVY DUTY TRUCK	3		3			
Grand Total	19	21	79			

SoCalGas Vehicle Types						
ATCM Currently Under Purchase Order						
VEHICLE TYPES 2017 2018 2019						
4. MEDIUM DUTY TRUCK	102	0	0			
Grand Total	102	0	0			

ORA DATA REQUEST ORA-SCG-035-LMW SOCALGAS 2019 GRC – A.17-10-008 SOCALGAS RESPONSE DATE RECEIVED: DECEMBER 7, 2017 DATE RESPONDED: DECEMBER 26, 2017 SoCalGas Response 3 CONTINUED:

During the process of preparing this data request, SoCalGas discovered an error in the vehicle counts listed in SCG-23 workpaper 2RF003.001 pages 6-7 and page 12 and 2RF003.002, pages 18-19 financial estimates remain accurate as only vehicle counts were transposed as part of text edits. The workpaper incorrectly listed the number ATCM vehicles. The workpaper will be corrected at the next opportunity. See detailed list of vehicles subject to ATCM compliance replacement with information requested in table ORA-SCG -35 -LMW-DATA, tab ORA_3A_Detail (attached). Age is listed in months at the time of the forecast, YE 2016. Please note that the costs indicated in this category also include units currently under purchase order that are subject to ATCM compliance replacement.

- b. The forecast model does not break-out the amortization, interest, salvage, license fees, and sales tax by vehicle type. The forecast model provides forecast in each of the presented groupings listed in the workpapers SCG-23 2RF003.001 2RF003.004; ATCM required replacements, incremental vehicles for business needs, AFV premium, and existing vehicle replacements due to replacement criteria being met.
- c. Yes, new vehicles are replacing assets that are on average 11 years old and fully amortized; as a result, new vehicles will be more expensive than the vehicles they are replacing. New vehicles in the ATCM category are on average \$73,834, or 51%, more expensive than the most recently purchased comparable vehicle of the type that is being replaced. Please see additional detail in table ORA-SCG-035-LMW-DATA, ORA_3A_Detail (attached). Age is listed in months at the time of the forecast, YE 2016.
- **d.** See detailed list of vehicles subject to ATCM compliance replacement with information request in table ORA-SCG-035-LMW-DATA, tab ORA_3A_Detail (attached). Age is listed in months at the time of the forecast, YE 2016.
- e. No, these replacements are 1 for 1.
- f. The first ATCM compliance deadline was January 1, 2012 for engine model year 2006 and older. ATCM regulations have continued adding additional engine model years subject to compliance where all diesel engines must comply with ATCM regulations in January 1, 2023. See ARB Truck and Bus Regulation Compliance Requirements Summary last updated August 29, 2014 for additional detail https://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf

ORA DATA REQUEST ORA-SCG-035-LMW SOCALGAS 2019 GRC – A.17-10-008 SOCALGAS RESPONSE DATE RECEIVED: DECEMBER 7, 2017 DATE RESPONDED: DECEMBER 26, 2017 SoCalGas Response 3 CONTINUED:

- **g.** SoCalGas intends to fully comply with ATCM requirements and replace 100% of vehicles subject to ATCM compliance.
- h. All non-compliant vehicles must be out of service by the compliance deadlines. If these vehicles are not replaced, SoCalGas cannot legally operate these vehicles which, in turn, will impact SoCalGas' crews' ability to complete work in the field. SoCalGas could also face fines and/or criminal penalties for non-compliance. See https://www.arb.ca.gov/diesel/tru/documents/faq.pdf for a list of potential fines.

4. Referring to Ex. SCG-23 testimony Pg. CLH-20 Line 8-10, ORA noted \$6.553 million (or 19%) of the 2019 amortization forecast total (note: questions will also pertain to other costs as well) is for replacements scheduled to be purchased in the 2017 through 2019 period. Based on this, please answer/provide the following:

- a. A list of the new vehicles, broken out by year (2017-2019), by vehicle type, and expected cost per vehicle,
- b. For each vehicle type the associated amortization, interest, salvage, license fees, and sales tax that ties to the 2017-2019 forecast.

c. Typically are the new vehicles more expensive than the replaced vehicles? If yes, on average by how much?

d. Will the purchase of these new vehicles increase the net size of SCG's fleet? If yes, by how many.

e. A list of vehicles, by year (forecast 2017-2019), by type, and their representative age that are being replaced with the purchase of these new vehicles.

f. Confirm these replacements are due to the useful life reaching their targeted useful life.

SoCalGas Response 4:

a.

SoCalGas Vehicle Types Replacements Scheduled to be Purchased							
VEHICLE TYPES	2017	2018	2019				
1. AUTOMOBILES	120	7	48				
2. COMPACT TRUCK & VANS	96	86	123				
3. LIGHT TRUCK & VANS	138	163	396				
4. MEDIUM DUTY TRUCK	4	16	13				
5. HEAVY DUTY TRUCK			19				
6. MECHANIZED TRAILER	14	11					
7. NON MECHANIZED TRAILER	96	64	12				
8. P.O.E. / M.W.E.	38	73	6				
Grand Total	506	420	617				

During the process of preparing this data request, SoCalGas discovered an error in the vehicle counts listed in SCG-23 workpaper 2RF003.001 pages 6-7 and page 12 and 2RF003.002, pages 18-19; financial estimates remain accurate as only vehicle counts were transposed as part of text edits. The workpaper incorrectly stated the number of replacement vehicles by year. The workpaper will be corrected at the next opportunity. The table in response 4a above correctly states the number of replacement vehicles by year. The table above does not include ATCM or incremental vehicles and is representative of the vehicles that are eligible for replacement based on age, mileage, and/or

SoCalGas Response 4 CONTINUED:

condition. See detailed list of vehicles subject to replacement with information requested in table ORA-SCG-035-LMW-DATA, tab ORA_4A_Detail (attached). Age and mileage is listed in months at the time of the forecast, YE 2016.

- b. The forecast model does not break-out the amortization, interest, salvage, license fees, and sales tax by vehicle type. The forecast model provides forecast in each of the presented groupings listed in the workpapers SCG-23 2RF003.001 2RF003.004; ATCM required replacements, incremental vehicles for business needs, AFV premium, and existing vehicle replacements due to replacement criteria being met.
- **c.** Yes, new vehicles are replacing assets that are on average 9 years old and fully amortized; as a result, new vehicles will be more expensive than the vehicles they are replacing. The new vehicles being replaced due to replacement criteria being met are on average \$6,676, or 27%, more expensive than the most recently purchased comparable vehicle of the type that is being replaced. Please refer to ORA-SCG-035-LMW-DATA, tab ORA_4A_Detail (attached) for a listing of vehicles and comparable pricing.
- **d.** No, these replacements are 1 for 1.
- e. See Table ORA-SCG-035-LMW-DATA, tab ORA_4A_Detail (attached) with a detailed list of vehicles subject to replacement and requested information. Age is listed in months at the time of the forecast, YE 2016.
- f. Replacements are due to the vehicle meeting one or more of the following criteria: 1) Compliance requirements (ATCM or other), 2) Age of vehicle, 3) Mileage of vehicle, or 4) Condition of vehicle. See detailed list of vehicles under purchase order with information request in table ORA-SCG-035-LMW-DATA, tab ORA_4A_Detail (attached).

5. Referring to Ex. SCG-23 testimony Pg. CLH-20 Line 13-14, ORA noted Alternative-Fuel Vehicles that are sold at a premium account for \$1.841 million (or 5%) of the 2019 amortization forecast. Also on Pg. CLH-24 Line 7-13, ORA noted as an AFV provider fleet, 90% of the SoCalGas annual light duty vehicle purchases are required under the EPAct to be approved alternative-fuel vehicles. To achieve the 90% annual requirement, SoCalGas plans to buy AFVs at a premium. SCG's fleet, specifically, all

the over-the-road vehicles, is aging. At the end of 2016, 1679 vehicles, or 42% of SCG's overthe-road fleet vehicles were 8 years and older. As a practice, SCG replaces over-the-road vehicles once they enter the seven-to ten-year mark.

- a. A list of the new vehicles, broken out by year (2017-2019) by vehicle type and expected cost per vehicle,
- b. For each vehicle type the associated amortization, interest, salvage, license fees, and sales tax that ties to the 2017-2019 forecast.
- c. Typically are the new vehicles more expensive than the replaced vehicles? If yes, on average by how much?

d. Will the purchase of these new vehicles increase the net size of SCG's fleet? If yes, by how many.

e. A list of vehicles, by year (forecast 2017-2019), by type, and their representative age that are being replaced with the purchase of these new vehicles.

f. As of the date of this request of the 1679 vehicles noted above, please provide a listing of the age of each vehicle.

g. How does the statement "sold at a premium" apply? Why aren't these simply AFV replacements?

h. Are all of the 1679 vehicles noted light duty vehicles?

SoCalGas Response 5:

a. This response contains Confidential information pursuant to PUC Code Section 583 & General Order 66-C /D, and D.16-08-024

This cost category is not a request for vehicle costs but rather is a request for the incremental technology or equipment needed above the base cost of a vehicle for the AFV technology or equipment. In terms of AFV vehicle replacement, we intend to target the categories below for AFV replacement, taking into consideration the availability of AFV infrastructure, payload capacity requirements, and job functions of each workgroup. As such SoCalGas estimates it will replace non-AFV's with AFV's in the quantities indicated below as well as pay a premium for the AFV technology and equipment.

SoCalGas Response 5:

- **b.** The forecast model does not break-out the amortization, interest, salvage, license fees, and sales tax by vehicle type. The forecast model provides forecast in each of the presented groupings listed in the workpapers SCG-23 2RF003.001 2RF003.004; ATCM required replacements, incremental vehicles for business needs, AFV premium, and existing vehicle replacements due to replacement criteria being met.
- **c.** Yes, the cost represented by the \$1.841 million are incremental costs for the AFV equipment and/or technology. See response 5a for incremental costs per vehicle by AFV technology.
- **d.** This cost category is not a request for vehicle costs but rather is a request for the incremental technology or equipment needed above the base cost of a vehicle for the AFV technology or equipment.
- **e.** 2017 financial information is expected to be available in late Q1 2018. SoCalGas intends to target the categories and quantities identified in response 5a for AFV replacements as part of the replacement planning process.
- **f.** The 1679 vehicles noted above refers to all over the road vehicles and is not specific to AFV vehicles. See detailed list of current vehicles with information requested in table ORA-SCG-035-LMW-DATA, tab ORA_2A_Detail (attached). Age and mileage is listed in months at the time of this response.
- **g.** The statement "sold at a premium" applies when purchasing an Alternative Fuel Vehicle ("AFV") to replace a non-AFV vehicle, which typically requires additional technology and equipment when compared to a non-AFV equivalent. SoCalGas plans to increase the AFV fleet by 891 units over the forecast period, which entails replacing a non-AFV asset with an AFV asset. The \$1.841 million (or 5%) of the 2019 forecast in this section represents the AFV premium only (the incremental cost to a non-AFV).

SoCalGas Response 5:-CONTINUED

h. The 1679 vehicles noted above refers to all over-the-road vehicles and is not specific to AFV vehicles. See detailed list of current vehicles with information requested in table ORA-SCG-035-LMW-DATA, tab ORA_2A_Detail (attached). Age and mileage is listed in months at the time of this response.

6. Referring to Ex. SCG-23 testimony Pg. CLH-20 Line 10-12, ORA noted \$4.587 million (or 13%) of the 2019 amortization forecast total (note: questions will also pertain to other costs as well) is for incremental vehicle additions requested by operating departments. And on Pg. CLH-23 lines 10-11 of testimony, ORA noted, additionally, the Company's operating departments estimate the need for 319 additional vehicles over the three-year 2017, 2018, and 2019. Based on this, please provide the following:

a. A list of the new vehicles, broken out by year (2017-2019) by vehicle type and expected cost per vehicle.

b. For each vehicle type the associated amortization, interest, salvage, license fees, and sales tax that ties to the 2017-2019 forecast.

c. For each additional vehicle requested, please provide specific use for the vehicle and justification for why the vehicle is needed.

d. Pursuant to the prior GRC, how many "incremental vehicle additions were requested, how many approved, and how many actually purchased for the period 2014-2016?

SoCalGas Response 6:

a.

SoCalGas Vehicle Types Incremental Vehicle Additions				
VEHICLE TYPES	2017	2018	2019	
1. AUTOMOBILES				
2. COMPACT TRUCK & VANS	5	4	2	
3. LIGHT TRUCK & VANS	77	105	11	
4. MEDIUM DUTY TRUCK	58	35	23	
5. HEAVY DUTY TRUCK		1	2	
6. MECHANIZED TRAILER	1			
7. NON MECHANIZED TRAILER				
8. P.O.E. / M.W.E.	2			
Total Incremental	143	145	38	
SoCalGas Vehicle Types				
Reductions Vehicle Additions				
1. AUTOMOBILES		-7		
Total Reductions	0	-7	0	

Total Incremental	143	138	38

SoCalGas Response 6:-CONTINUED

See detailed list of incremental vehicles with information requested in table ORA-SCG-035-LMW-DATA, tab ORA_4A_Detail (attached).

- b. The forecast model does not break-out the amortization, interest, salvage, license fees, and sales tax by vehicle type. The forecast model provides forecast in each of the presented groupings listed in the workpapers SCG-23 2RF003.001 2RF003.004; ATCM required replacements, incremental vehicles for business needs, AFV premium, and existing vehicle replacements due to replacement criteria being met.
- c. Please see the testimony of Gina Orozco-Mejia, Gas Distribution Ex. SCG-04 page GOM-12; Devin Zornizer, Gas Control and System Operations/Planning Ex. SCG-13 page DKZ-26; and Gwen Marelli, Customer Service Field & Meter Reading Ex. SCG-18 pages GRM-8, GRM-27, GRM-31 and GRM-43 for justification and forecast methodology related to the need for incremental vehicles.
- d. In the 2016 GRC SoCalGas requested 506 incremental vehicles for the period 2014 2016. Please refer to 2016 GRC workpapers of Carmen Herrera, SCG-15 2RF003.001 page 11.

It is not possible to determine how many incremental vehicles were approved because the Commission adopted ORA and SoCalGas' joint settlement agreement which did not specifically detail the number of incremental vehicles. Please refer to Joint Motion for Adoption of Settlement Agreements Regarding Southern California Gas Company's Test Year 2016 General Rate Case, Including attrition Years 2017 and 2018 filed on November 14, 2014, starting on page 138.

SoCalGas Incremental Vehicles Purchased				
Year	2014	2015	2016	
INCREMENTAL				
VEHICLES	93	6	139	
PURCHASED				

7. How does SCG account for vehicle costs? For example, does SCG use a pooling method or are costs accounted for by individual lease?

SoCalGas Response 7:

SoCalGas uses the pooling method for example similar passenger sedans are grouped into one vehicle class to facilitate cost clearing to the various user groups.

8. Regarding fleet replacement, it appears a number of vehicles have reached their useful lives all within this GRC's forecast period. Please provide an explanation why there is this increased need in comparison to the prior years. Also explain why SCG's fleet is not being replaced at a more consistent basis spread over the years

SoCalGas Response 8:

SoCalGas aims to replace approximately 10% of its fleet per year to maintain a uniform replacement plan. CARB requirements for ATCM requires early replacement of heavy duty vehicles, which contribute to upward pressures on Fleet Services costs. In prior years, for example, SoCalGas Fleet Services organization could address ATCM requirements through diesel particulate filters (i.e., retrofits). However, these retrofits are no longer allowed and SoCalGas must begin its efforts to replace these vehicles to maintain compliance with regulatory requirements. (See also, Carmen Herrera SCG Testimony, Chapter 23, page CLH-23, lines 25-26, CLH-24, lines 1-6.)

9. Please provide the net additions and subtractions by vehicle type for the period 2009 to 2017 (to date).

SoCalGas Response 9:

Please see response 1c above.

10.Referring to Ex. SCG-23 workpaper page 12 (replacement units) and page 31 (salvage units), it appears the number of replacement units exceeds the number of salvage units. If the vehicles are being "replaced" then please provide an explanation why the number of replacements appears significantly higher than salvage units.

SoCalGas Response 10:

This is a timing difference between the new vehicle becoming available for use and the old vehicle being made ready for auction, sent to auction, and auction proceeds received from auction company. Response 1c above shows that for the periods between 2009 to 2016 SoCalGas has decreased the number of fleet vehicles by 56 using this auction process.

11.Pursuant to the last GRC, please provide the following:

a. SCG's request in testimony, amount approved by the Commission, and actual expenditures for amortization, interest, salvage, license fees, and sales tax for the period 2014 – 2016. b. Additionally, what forecast methodology was used?

SoCalGas Response 11:

- **a.** In the 2016 GRC Testimony of Carmen Herrera SCG-15, page CLH-8, line 3, the requested amounts in each of the ownership categories for TY16 were as follows:
 - a. Amortization, \$30.751M
 - b. Interest, \$3.767M
 - c. Salvage, (\$1.248)M
 - d. License Fees, \$3.869M

The Commission adopted ORA and SoCalGas' joint settlement agreement of \$30.246M for Amortization, \$3.400M for Interest, (\$1.248)M for Salvage, and \$3.500M for License Fees. Please refer to Joint Motion for Adoption of Settlement Agreements Regarding Southern California Gas Company's Test Year 2016 General Rate Case, including attrition Years 2017 and 2018 filed on November 14, 2014, pages 141 - 144. Please see workpapers SCG-231 2RF003.001 Amortization, 2RF003.002 Interest, 2RF003.003 Salvage, 2RF003.004 License Fees & sales tax for actual expenditures for the period 2014 – 2016 in these categories.

b. Forecast methodology remains unchanged from previous GRC; zero based for fleet ownership. Please see workpapers SCG-23 2RF003.001 Amortization, 2RF003.002 Interest, 2RF003.003 Salvage, 2RF003.004 License Fees & sales tax for forecast methodology.

12.For 2017 to date, please provide the following:

a. Amortization, interest, salvage, license fees, and sales tax costs by vehicle type.

b. Actual number of vehicles by type.

c. Actual number of salvage vehicles by type.

SoCalGas Response 12:

- **a.** 2017 financial information is expected to be available in late Q1 2018.
- **b.** See data request response 2a for current vehicles by vehicle types.
- c. 2017 financial information is expected to be available in late Q1 2018.