ORA DATA REQUEST
ORA-SCG-064-DAO
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: DECEMBER 27, 2017
DATE RESPONDED: JANUARY 19, 2018

Exhibit Reference: SCG-04 Testimony and Workpapers
SCG Witness: Gina Orozco-Mejia
Subject: Gas Distribution Capital, Regulator Stations

Please provide the following:

1. Referring to Ex. SCG-04 testimony, page GOM-109, lines 20-21, please provide:

   a. A copy of the calculations and supporting documents SCG used to determine the average age of the 1,975 regulator stations system-wide is 29 years old; and

   b. Does the average age change from year to year? If yes, please provide the average age for each year from 2012-2016 and include a copy of all calculations and supporting documents used to determine the average age annually.

SoCalGas Response 1:

a. The regulator stations average age was calculated by reviewing the age of all regulator stations at the time the forecast was developed and calculating an average number. Please see the table below for a breakdown of regulator stations age range and count in that range. Based on this information, SoCalGas estimated the current average age of regulator stations at 29 years old.

Age	Count
0 - 5 Years	111
5 - 9 Years	139
10 - 14 Years	157
15 - 19 Years	155
20 - 24 Years	163
25 - 29 Years	288
30 - 34 Years	153
35 - 39 Years	136
40 - 44 Years	161
45 - 49 Years	188
> 50 Years and older	324
Grand Total	1,975

b. Yes, the average age of regulator stations may change as older regulator stations are replaced with newer ones. The count below represents the year-end total of regulator stations in the system.

Year	Count	Average
2012	1,972	34
2013	1,974	33
2014	1,965	33
2015	1,968	32
2016	1,972	32
2017	1,973	32

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2. On page GOM-109, lines 22-23, SCG states, "While SoCalGas has approximately a third of its regulator stations with components that exceed 35 years, prudent operating and maintenance practices have allowed these stations to remain in service." On page GOM-110, lines 21-23, SCG states, "At the current replacement rate, 68% of the regulator stations in the system will be above the expected useful life of 35 years."

ORA's understanding is that in the first statement, there are 33% of regulator stations that exceed 35 years, while the second statement indicates that 68% of the regulator stations are 35 years. Please provide clarification for these statements.

SoCalGas Response 2:

The statement on page GOM-109, lines 22-23 referred to the approximate percentage of regulator stations that exceeded 35 years of age, which was approximately a third of the 1,975 regulator stations in the system. The statement on page GOM-110, lines 21-23 was part of an overview of an incremental program to increase the number of regulator stations replacements. It was based on a 10-year projection with the current regulator station inventory age progression. It did not factor in the "new" stations in the total or percentages.

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3. On page GOM-110, lines 27-28, SCG states that the utility is asking for an incremental $6,000,000 in 2018 and $10,800,000 in 2019. Please explain and show how the two requests were determined and provide a copy of all calculations and supporting documents used to develop the forecasts.

SoCalGas Response 3:

Please see page 88 of workpapers SCG-04-CWP-GDIST for calculation details. SoCalGas forecasted the incremental replacement regulator stations using a ramp-up approach starting in 2018 with 10 replacements and increasing that amount to 18 by 2019 to address the concerns as referenced on page GOM-110, lines 15-25.

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4. Referring to Ex. SCG-04, page GOM-110, lines 29-30, please provide the following:

a. The number of crew trucks allocated for the work activities tracked under the Regulator Station Replacement Program each year from 2012-2017YTD;

b. A copy of the calculations and all supporting documents used to determine the need for one incremental truck in 2018 and two in 2019;

c. Provide a citation to SCG's witness Ms. Herrera's testimony and workpapers as referenced.

SoCalGas Response 4:

a. Crew trucks are not assigned specifically to the Regulator Station Replacement Program work activities. M&R Crew trucks are assigned to each facility based on the number of M&R employees and work function per base location. Please see the number of crew trucks below assigned to Gas Distribution M&R from 2012 – 2017 YTD (November 30, 2017).

M&R Crew Trucks (2012 - 2017YTD)						
	2012	**2013**	**2014**	**2015**	**2016**	**2017**
Vehicles	18	31	36	37	37	43

b. SoCalGas determined the incremental crew trucks in 2018 and 2019 based on the historical straight time FTEs from 2012 – 2016 under the capital regulator stations workbook and the forecasted amount of FTEs (2017 – 2019) for the incremental activities related to regulator station activities. The percentage of straight time under capital regulator station work was multiplied by the forecasted FTEs to determine a headcount. The headcount increase for each year is used to determine the number of vehicles needed using a 1.5-headcount per vehicle ratio for heavy-duty vehicles for Measurement & Regulation. Based on this methodology, SoCalGas forecasted two incremental heads in 2018 and four in 2019. Applying the headcount-to-vehicle ratio provided the forecast for the number of vehicles needed, as mentioned on page GOM-110, lines 29-30. SoCalGas is adding one crew truck in 2018 and two in 2019.

c. Please see Ex. SCG-23 pages CLH-17 - CLH-26 and workpapers SCG-23-WP_FLEET-FAC, 2RF003.001 Amortization, 2RF003.002 Interest, 2RF002.000 Maintenance Operations and 2RF002.001 Automotive Fuel. Additionally, please see workpapers SCG-23-WP_FLEET-FAC, page 14 for sample calculations for vehicle ownerships costs.

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5. Does SCG anticipate that additional/new regulatory requirements for the operation and maintenance of regulator stations will be in effect during the 2019 GRC cycle? If yes, please identify the requirements SCG anticipates will be in effect, and provide a copy of all supporting documents.

SoCalGas Response 5:

SoCalGas did not identify additional or new regulatory requirements impacting regulator stations during the TY 2019.