## ORA DATA REQUEST ORA-SCG-123-TXB SUPPLEMENTAL SOCALGAS 2019 GRC – A.17-10-008 SOCALGAS RESPONSE

DATE RECEIVED: FEBRUARY 6, 2018
DATE ORIGINALLY RESPONDED: FEBRUARY 13, 2018
DATE OF SUPPLEMENTAL RESPONSE: MARCH 23, 2018

Exhibit Reference: SCG-03-R/SDG&E-03-R

SCG Witness: Snyder & Clark

Subject: Fueling Our Future (FOF) Policy, 2017 recorded capital

## Please provide the following:

1. Referring to SCG's response to data request ORA-SCG-011-TXB, Q.1, Attachment, Excel tab "Implementation Capital", please provide a spreadsheet with the recorded 2017 capital amounts for column "E" for both SDG&E and SCG.

## SoCalGas and SDG&E Supplemental Response 1:

SoCalGas and SDG&E object to this request on the grounds that it is unduly burdensome. SoCalGas and SDG&E are not required to create new data or present existing data in a different form beyond that which might be readily available. There are no instructions or requirements in the Rate Case Plan regarding the provision of Base Year + 1 data (in this case 2017 data). SoCalGas and SDG&E have already provided sufficient 2017 data in the 2017 Recorded-Adjusted Capital Expenditure file submitted to ORA in March 2017 in the format nearly identical to that provided in the 2016 General Rate Case for base-year-plus-1 data. Subject to and without waiving the foregoing objection, SoCalGas and SDG&E respond as follows:

Please see the attached file with the readily available information requested for the FOF capital expenditures, ORA-SCG-123-TXB Supplemental Attachment, which is being produced only to ORA. Note: Information may not be readily available for other GRC witness areas. SoCalGas and SDG&E reserve the right to treat requests for such information on a case-by-case basis, including, but not limited to, whether information requested is unduly burdensome, irrelevant, and exceeds the scope of permissible discovery under Rule 10.1 to produce.

As described on the Notes and Disclaimers section of that attachment, specifically in note 1.2, IT Capital may be embedded as a portion of other projects and therefore cannot be separately reported on. IT Capital is managed at the portfolio level due to changes in priorities and regrouping of work. As described in section III. H. of the Fueling Our Future (FOF) Policy testimony, FOF is a work-in-progress initiative and it is possible that some of the approved FOF ideas do not move forward to implementation. Regardless, the overall FOF savings are committed in SDG&E and SCG GRC filings whether or not the savings are realized.

Similarly, for the line item labeled Gas Transmission Budget Code M04350, the actuals were incurred under Budget Code M04150. The original FOF Implementation cost of this line item represented a portion of Phase 1 work, however, those costs cannot be separately isolated from the total costs incurred, so the actuals shown in the attachment represent the total 2017 costs of Rainbow Compressor Station project.