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Regarding SCG-19R: Customer Services - Office Operations

- 4.1 With respect to the request for funding of the CTAs Customer Data Exchange in SCG-19, page MHB-70, please state:
 - 4.1.1 How many CTAs currently serve core customers on the SoCalGas system?
 - 4.1.2 How many core customers on the SoCalGas system are served currently by CTAs?
 - 4.1.3 In percentage terms, how much of the core gas requirements are served by CTAs?

Utility Response 4.1:

- 4.1.1 There are 22 active CTAs serving core customers on the SoCalGas system.
- 4.1.2 The CTAs serve 71,137 customer accounts.
- 4.1.3 CTAs make up 7.75% of the total core load.

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Regarding the Response to SCGC-SEU-002

4.2 Regarding the response to Q.2.5.1: Please confirm that the MDMS data set contains the MTU identifier in addition to the hourly meter data.

Utility Response 4.2:

SoCalGas objects to Question 4.2 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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4.3 Regarding the response to Q.2.5.4: Does the MDMS data set that is uploaded daily to the Data Warehouse contain all of the hourly metering history that is available for a given MTU identifier in addition to the hourly metering data for that MTU identifier for the previous metering day?

Utility Response 4.3:

SoCalGas objects to Question 4.3 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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4.4 If the answer to the previous question is "no," please define the portion of the metering history that is available for a given MTU identifier.

Utility Response 4.4:

SoCalGas objects to Question 4.4 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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4.5 In terms of a simultaneous query of the CIS data that has been uploaded to the Data Warehouse and the AMI data for the previous metering day that has been uploaded to the Data Warehouse, how long would it take to run a query within the Data Warehouse for the entire approximately 5.9 million customers that selects the identity of each core customer's gas provider from the CIS data and selects the AMI data for the previous metering day and writes the MTU identifier, the identity of the gas provider, and the total of the hourly metering data for the previous day to a new database within the Data Warehouse converting the hourly reads of cubic feet to therms and compiling the results by the identity of the gas providers, *e.g.*, Gas Acquisition, CTA #1, CTA #2, *etc.*, so a total daily metered use for the previous metering day is determined for each gas provider?

Utility Response 4.5:

SoCalGas objects to Question 4.5 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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4.6 Would the time required to run the query scale down linearly, *e.g.*, if 40 percent of the customers were included in the query described previously would the time required be approximately 40 percent of the time required for the previously described query?

Utility Response 4.6:

SoCalGas objects to Question 4.2 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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Regarding SDG&E-18: Customer Service Office Operations

- **4.7.** With respect to the statement on page JDS-65: "The Smart Meter Systems Upgrade project will upgrade the CE and MDMS and associated database hardware in order to reduce the risk of catastrophic system failure and avoid significant costs associated with system recovery and lost revenue."
- **4.7.1.** Regarding the CE (Collection Engine) and MDMS (Meter Data Management System), does the proposal intend to upgrade the programming, software utilized by the programming or hardware (computer systems) employed by the software or some combination of these three?
- **4.7.2.** What changes will be made to the associated database hardware under this proposed upgrade?
- **4.7.3.** How many times per day does the CE collect data from the gas meters under the current system?
- **4.7.4.** At what times each day does the CE collect data from the gas meters under the current system?
- **4.7.5.** Please describe each step taken by the CE as it collects metering data under the current system.
 - **4.7.5.1.**Is the gas metering data collected separately from the electric metering data or simultaneously for those customers having both a gas and an electric meter?
 - **4.7.5.2.** Does each gas meter have a unique identifier?
 - **4.7.5.3.** Does each gas meter module have a unique identifier?
 - **4.7.5.4.**Does the CE collect the metering information from the gas meters or do the gas meters send the metering information to the CE?
 - **4.7.5.5.**How much time is required for the CE to collect the data from all individual gas meters?
 - **4.7.5.6.**Does the CE collect the data from the individual gas meters according to a specified pattern?
- **4.7.5.7.**If the answer to the previous question is "yes," please describe the pattern and if the answer to the previous question is "no," please state whether the CE collects the gas metering data in a random fashion.
- **4.7.6.** How many times per day will the CE collect data from the gas meters under the proposed system?
- **4.7.7.** At what times each day will the CE collect data from the gas meters under the proposed system?
- **4.7.8.** Please describe each step that will be taken by the CE as it collects metering data under the proposed system.
 - **4.7.8.1.**Under the proposed system will the gas metering data be collected separately from the electric metering data or simultaneously for those customers having both a gas and an electric meter?
 - **4.7.8.2.**Under the proposed system will the CE collect the metering information from the gas meters or will the gas meters send the metering information to the CE?

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Question 4.7 Continued:

- **4.7.8.3.**How much time will be required for the CE to collect the data from all individual gas meters?
- **4.7.8.4.**Under the proposed upgrade, will the CE collect the data from the individual meters according to a specified pattern?
- **4.7.8.5.**If the answer to the previous question is "yes," please describe the pattern and if the answer to the previous question is "no," please state whether the CE will collect the metering data in a random fashion.
- **4.7.9.** Please describe the steps that are taken by the CE in transferring the metering data to the MDMS system under the current system.
 - **4.7.9.1.**Does the CE perform any verification processes under the current structure?
 - **4.7.9.2.**If the answer to the previous question is "yes," please list each of the verification processes and state how much time is necessary to complete these processes.
 - **4.7.9.3.**How many times during each day does the CE transfer metering data to the MDMS under the current system?
 - **4.7.9.4.**If only a portion of the metering data is transferred at any one time, please describe the data that is transferred specifying whether it is complete records for the day for a given subset of gas meter modules or if it is partial metering data for the day for all or a portion of the gas meter modules.
 - **4.7.9.5.**Does the resulting metering database contained in the MDMS include the unique identifier for the gas metering module or alternatively the gas meter?
- **4.7.10.** Please describe the steps that are taken by the CE in transferring the metering data to the MDMS system under the proposed upgraded system.
 - **4.7.10.1.** Will the CE perform any verification processes under the proposed upgraded structure?
 - **4.7.10.2.** If the answer to the previous question is "yes," please list each of the verification processes and state how much time will be necessary to complete these processes.
 - **4.7.10.3.** How many times during each day would the CE transfer metering data for the previous metering day to the MDMS under the proposed system?
 - **4.7.10.4.** If only a portion of the metering data is transferred at any one time, please describe the data that would be transferred specifying whether it will be complete records for the day for a given subset of gas meter modules or if it will be partial metering data for the day for all or a portion of the gas meter modules.

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Question 4.7 Continued:

- **4.7.10.5.** Will the resulting metering database contained in the MDMS include the unique identifier for the gas metering module or alternatively the gas meter?
- **4.7.11.** Under the current system, does the MDMS data contain all of the hourly metering history that is available for a given gas meter module identifier (or gas meter identifier) in addition to the hourly metering data for that gas meter module identifier (or gas meter identifier) for the previous metering day?
- **4.7.12.** Under the proposed system, will the MDMS data contain all of the hourly metering history that is available for a given gas meter module identifier (or gas meter identifier) in addition to the hourly metering data for that gas meter module identifier (or gas meter identifier) for the previous metering day?

Utility Response 4.7:

4.7.1 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request is vague and ambiguous with respect to the term "the programming." Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Both the software and hardware associated with CE and MDMS have been or will be upgraded. This includes all application and database server hardware, server operating systems, application and database management software, and system integrations in all pre-Production and Production environments.

- **4.7.2** Both CE and MDMS databases are to be moved from shared IBM AIX frames to newly provisioned Oracle Linux DB servers capable of supporting the latest version of Oracle (12c) allowing for more resources to be allocated to each application DB instance as data volumes grow.
- **4.7.3** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

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Utility Response 4.7 Continued:

4.7.4 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.5 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.5.1 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data Into the Core Balancing Process, A.17-10-002.

4.7.5.2 Yes.

4.7.5.3 Yes.

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Utility Response 4.7 Continued:

4.7.5.4 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.5.5 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.5.6 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.5.7 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

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Utility Response 4.7 Continued:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.6 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.7 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.8 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes from the previous system.

4.7.8.1 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

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Utility Response 4.7 Continued:

There will be no changes from the previous system. Data will continue to be collected together.

4.7.8.2 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes from the previous system.

4.7.8.3 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes from the previous system.

4.7.8.4 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes from the previous system.

4.7.8.5 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

There will be no changes from the previous system.

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Utility Response 4.7 Continued:

4.7.9 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.9.1 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request is vague and ambiguous with respect to the term "verification processes" and 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

4.7.9.2 N/A

4.7.9.3 Metering data is transferred to the MDMS as it is received from meters throughout the day. This happens during normal interrogation windows as well as during daily efforts to fill electric meter interval data gaps. These gap-fill efforts occur throughout the day.

4.7.9.4 N/A

4.7.9.5 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Yes, in the current version both the gas meter id and the meter module MAC address reside in the MDMS.

4.7.10 There is no change from the previous system.

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Utility Response 4.7 Continued:

4.7.10.1 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request is vague and ambiguous with respect to the term "verification processes" and 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

4.7.10.2 N/A

4.7.10.3 There is no change from the previous system.

4.7.10.4 N/A

4.7.10.5 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

In the new version of MDMS only the gas meter module MAC address will reside in MDMS.

4.7.11 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

4.7.12 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

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Utility Response 4.7 Continued:

See Testimony of Jerry Stewart, Application of SoCalGas and SDG&E Regarding Feasibility of Incorporating Advanced Meter Data into the Core Balancing Process, A.17-10-002.

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- 4.8. With respect to the statement on page JDS-71: "The Enhanced Network Analytics Project would build a Smart Meter Analytics platform that enables efficient and robust data processing, and enhanced reporting and analytics capabilities required to maintain a reliable Advanced Metering Infrastructure (AMI) network. The platform will integrate customer information, meter data and attributes, distribution assets, weather data, and data from various sources that is required to proactively report, analyze, and prioritize data quality issues and meter exceptions. This application would also establish the foundation required to quickly scale and store new data, develop new analytical dashboards, and provide necessary reporting."
 - **4.8.1.** Where does SDG&E currently maintain and analyze its customer information, *e.g.*, does SDG&E have a separate Customer Information database?
 - **4.8.2.** Does the Customer Information database contain information about customers that includes service address (location of meter), billing address, whether the customer is core or noncore, rate schedule(s) that apply to customer for billing purposes, and for core customers the identity of the provider of gas procurement services?
 - **4.8.3.** Does the Customer Information database contain a unique identifier for the gas meter and a separate unique identifier for the gas meter module?
 - **4.8.4.** Does SDG&E currently use the Customer Information database to calculate customer bills or does SDG&E currently use the MDMS system to calculate customer bills?
 - **4.8.5.** Does SDG&E currently have the ability to simultaneously query customer information and AMI data?
 - **4.8.6.** If the answer to the previous question is "yes," please describe the database environment within which these queries occur.
 - **4.8.7.** Does SDG&E already have its own Data Warehouse in use?
 - **4.8.8.** If the answer to the previous question is "no," does SDG&E use SoCalGas' Data Warehouse?
 - **4.8.9.** In terms of a simultaneous query of the customer information data that has been uploaded to the Data Warehouse and the AMI data for the previous metering day that has been uploaded to the Data Warehouse, how long would it take to run a query within the Data Warehouse for the entire approximately 0.9 million gas customers that selects the identity of each core customer's gas provider from the customer information data and selects the AMI data for the previous metering day and writes the gas module (or gas meter) identifier, the identity of the gas provider, and the total of the metering data for the previous day to a new database within the Data Warehouse converting the meter reads of cubic feet to therms and compiling the results by the identity of the gas providers, *e.g.*, Gas Acquisition, CTA #1, CTA #2, *etc.*, so a total daily metered use for the previous metering day is determined for each gas provider?

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Question 4.8 Continued:

- **4.8.10.** How would the "Smart Meter Analytics platform" described above be different from a Data Warehouse system, *e.g.*, the Data Warehouse maintained by SoCalGas for use in analyzing its AMI data in conjunction with data from other sources, such as its Customer Information System?
- **4.8.11.** Does SDG&E currently have the capability of providing AMI data to SoCalGas on a daily basis?

Utility Response 4.8:

- **4.8.1** SDG&E maintains customer information in the DB2 database supporting the Customer Information System (CIS). For reporting and analysis of customer information, SDG&E currently utilizes its Enterprise Data Warehouse (EDW).
- **4.8.2** The DB2 database contains the customer service address, general location of the meter, billing address, and rate schedule. The DB2 database does not contain gas procurement services information.
- **4.8.3** Yes.
- **4.8.4** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.
- **4.8.5** Yes, SDG&E has the ability to simultaneously query customer information and AMI data, but that query would be limited to the energy consumption information that is available at that moment in time.
- **4.8.6** Microsoft SQL Server Enterprise Data Warehouse (EDW).
- **4.8.7** Yes.
- **4.8.8** N/A
- **4.8.9** SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request lacks foundation, is an incomplete hypothetical, and 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

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Utility Response 4.8 Continued:

4.8.10 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request lacks foundation and 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

The Smart Meter Analytics platform integrates numerous AMI data sources (beyond energy consumption information) that are not integrated with either the SDG&E Enterprise Data Warehouse system or DB2 database.

4.8.11 SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request 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 likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding.