

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 1:

1. Please provide a copy in Microsoft Excel format of the Long Run Marginal Cost Study.
 - a. Provide all supporting documentation, including workpapers in Microsoft Excel format that include all formulas, calculations, active cells, and links.

Response 1a:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

- b. Please provide a copy in Microsoft Excel format of the Long Run Marginal Cost Study updating 2021 with all actual recorded data for 2022.

Response 1b:

SDG&E object to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the LRMC in SDG&E's testimony does not include recorded data for 2022 and SDG&E further object that undergoing such a study at this time is unduly burdensome.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 2:

2. At the time of the filing, what data was not available to SDG&E for the LRMCS analysis?
 - a. Please provide a list and a brief description of the data that was not available including the reason.

Response 2a:

2022 data was not available. The Cost Allocation Proceeding Application was filed on September 30, 2022.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 3:

3. How do the results for the Transmission and Storage functions using the NCO and Rental Marginal Cost compared to the Embedded Cost method?
 - a. Please provide the results in Microsoft Excel format that includes all formulas, calculations, active cell, and links.

Response 3a:

This information is not available. D.09-11-006 adopted embedded cost allocation for transmission and storage facilities and long-run marginal cost (“LRMC”) allocation for distribution facilities for both SDG&E and SoCalGas.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 4:

4. How do the results for the customer-related capital costs using the NCO Marginal cost compared to the Rental method?
- a. Please provide the results in Microsoft Excel format that includes all formulas, calculations, active cell, and links.

Response 4a:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

See Ch 10_SDGE 2024TCAP LRMC Customer Costs.xls, tab: Output, rows 11 and 12.

- b. Please provide the results in the same format as Table 1 for NCO only.

Response 4b:

TABLE 1 CUSTOMER-RELATED LRMC - CAPITAL COSTS NCO	
Customer Class	NCO Method only (2024 \$/customer)
Residential	\$34
Core Commercial/Industrial	\$42
Natural Gas Vehicle	\$58
Noncore Commercial/Industrial	\$67
Small Electric Generation	\$37
Large Electric Generation	\$42

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 5:

5. Please provide the most recent five years (2018-2022) of actual new customer hookups for residential, core commercial and industrial customers in SDG&E's service territory.

Response 5:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

The most recent five years (2018-2022) of actual new customer hookups for residential, core commercial and industrial customers in SDG&E's service territory is not readily available. A forecast of 2023 to 2025 new customer hookups is shown in Ch 10_SDGE 2024TCAP LRMC Customer Costs.xls, tab: NCO Hookups.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 6:

6. Please provide the Marginal Direct O&M Costs O&M expense as illustrated in Table 2 in Microsoft Excel format that includes all formulas, calculations, active cell, and links.
 - a. Please update Table 2 with recorded actual 2022 data and provide a copy in Microsoft Excel format that includes all formulas, calculations, active cell, and links.

Response 6a:

The recorded actual 2022 data is not readily available.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 7:

7. Please provide the total marginal customer costs for the six customer classes as illustrated in Table 3 in Microsoft Excel format that includes all formulas, calculations, active cell, and links.
 - a. Please update Table 3 with recorded actual 2022 data and provide a copy in Microsoft Excel format that includes all formulas, calculations, active cell, and links.

Response 7a:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

See Ch 10_SDGE 2024TCAP LRMC Customer Costs.xls. The 2022 data is not readily available.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 8:

8. Please provide the linear regression model in Microsoft Excel format for Marginal Capital Cost.

Response 8:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

See Ch 10_SDGE 2024TCAP LRMC Distribution Costs.xls, tab: Regression

- a. Please provide all variables and a description and source.

Response 8a:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, sent on May 11, 2023. See Ch 10_SDGE 2024TCAP LRMC Distribution Costs.xls. The variables are the Cumulative Investment and the Peak Day Cumulative Demand, as shown in tab: Regression. The Gas Engineering Department provided the Historical and forecasted investment. Demand forecasting provided the Peak Day Demand.

- b. Please include all formulas, calculations, active cell, and links in addition to all Tables and Figures associated with this model.

Response 8b:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023.

See Ch 10_SDGE 2024TCAP LRMC Distribution Costs.xls.

- c. Please provide all the data utilized in this model including actual 2022 recorded data for all variables in this model.

Response 8c:

The 2022 data is not readily available.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 9:

9. Provide a list of all capital projects including which customer groups are expected to be served by the projects, to increase or expand distribution capacity, or just reinforce or replace existing capacity.

Response 9:

SDG&E object on the ground that the term “capital projects” as used in the question is vague and ambiguous. Subject to this objection, SDG&E respond as follows:

To increase or expand distribution capacity (all customer groups):

- BC 500 – Gas Distribution New Business – Funds for the installation of gas mains and services and associated equipment to serve new customers.
- BC 502 – Gas Distribution meters and regulators – Funds to install meters and regulators to serve the additions to the existing gas distribution system for serving new customers.

To reinforce or replace existing capacity (all customer groups):

- BC 503 – Gas Distribution – System Reinforcement – Funds for installation of new gas mains, regulator stations or upgrading existing gas mains in order to boost system gas pressure to maintain service reliability.
- BC 508 – Gas Distribution Mains & Service replacements for emergency leak repairs – Funds for the elimination of hazardous conditions due to deteriorating gas piping by replacement or repair of leaking pipelines. - Emergency response
- BC 514 - Gas Distribution Mains & Service replacements – Funds for pipe replacements for RAMP projects or planned replacement projects with leak history
- Early vintage steel piping replacements:
 - BC 19564, BC 19565, BC 19567 – Various categories of vintage steel pipe replacements – Funds to replace older pipe in SDG&E’s gas pipeline system.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 10:

10. Provide Table 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and Chart 1, 2, in Microsoft Excel format and include all formulas, calculations, active cell, and links for all Tables and Figures associated with this SDG&E Cost Allocation and Long Run Marginal Cost Study.
- a. Please provide an additional set of the same Tables and Charts and recalculate the formulas and equations with actual recorded 2022 data in Microsoft Excel format that includes all formulas, calculations, active cell, and links.

Response 10a:

Please refer to response, DR-2209015-PAO-SCG-SDGE-WP, provided in SoCalGas' response to Data Request 1 of Cal Advocates dated May 11, 2023, for the following:

- Tables 1, 2, 3, 4, 7 and 10 are shown in Ch 10_SDGE 2024TCAP LRMC Customer Costs.xls, tab: Testimony Table
- Tables 5, 6 and Charts 1, 2 are shown in Ch 10_SDGE 2024TCAP LRMC Distribution Costs.xls, tab: Testimony Tables
- Tables 8 and 9 are shown in Ch 10_SDGE 2024TCAP LRMC OM Loader.xls, tab: Testimony Table
- Tables 11 – 15 are shown in Ch13_Gas Rates SDGE – TCAP.xls, tab: TCAP Exhibits.

Data for 2022 is not readily available.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 11:

11. Please explain in detail the rationale of why Table 15 shows a decrease in Residential, Core C/I, and NGV for proposed Allocation of Base Margin.

Response 11:

The allocated customer costs decreased for the Residential, Core C/I, and NGV.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

**DATA REQUEST DR-A2209015-PAO-SDGE-01-MPS FROM CAL ADVOCATES
DATED MAY 4, 2023**

SDG&E RESPONSE DATED: MAY 12, 2023

Question 12:

12. If SDG&E is not able to provide the requested information to all the questions above, state the reason(s) in the response.

Question 12:

See Responses 1-11.