

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2016.

Application 14-11-003
(Filed November 14, 2014)

And Related Matter

Application 14-11-004

**SECOND SET OF DATA REQUESTS BY
THE COALITION OF CALIFORNIA UTILITY EMPLOYEES**

The following data requests are submitted by the Coalition of California Utility Employees. Please provide your responses, via email if available, by March 19, 2015 to each of the following people:

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Please identify the person who prepared your responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

I. POLES (continued)

20. In the SCE TY2015 GRC (A13-11-003), SCE indicated that it had performed a stratified survey of just over 5000 wood poles and determined that roughly 20% of its wood poles would fail current pole loading standards. Please indicate, for SDG&E:

- a. What analyses or surveys has SDG&E done of its wood poles to determine their compliance with current pole loading standards?
- b. What percentage of SDG&E's wood poles does SDG&E believe are in compliance with CPUC pole loading regulations because of grandfathering provisions, but would not meet current standards for new poles?
- c. What percentage of SDG&E's poles does it believe are not in compliance with CPUC pole loading regulations?
- d. What measures is SDG&E planning in this cycle to verify pole loading compliance for its wood poles?
- e. What number of pole replacements is SDG&E planning in each year of this GRC cycle to replace poles that are out of compliance with CPUC pole loading regulations?
- f. What number of pole replacements is SDG&E planning in each year of this GRC cycle to replace poles that are in technical compliance with CPUC pole loading regulations, but only because of grandfathering provisions of those regulations, and would otherwise not be in compliance?

21. In the FiRM workpapers, for each dollar cost amount shown on pp. 756 and 789 of the Exhibit 9 workpapers, please indicate how many pole replacements are expected to be done as part of that cost amount.

II. OTHER

22. With regard to Aldyl-A plastic gas pipe:

- a. Please confirm that SDG&E plans to replace 17 miles of Aldyl-A pipe during this GRC cycle (Ex. 7, p. 16).

- b. Please indicate the total miles of Aldyl-A pipe on SDG&E's system at the end of each year from 2010-14 (actual) and 2015-2016 (forecast).
- c. By what year does SDG&E plan to complete replacement of Aldyl-A pipe on its system?

23. With regard to the proposal to defer replacement of aging gas compressors to the next GRC (Ex. 6, pp. 22-23):

- a. Please provide SDG&E's best estimate of the annual rate of methane leakage from its aging compressors.
- b. Please explain why SDG&E believes it is safe and appropriate to defer these replacements to the next GRC.

24. SDG&E's testimony indicates that it has 90 miles of unjacketed feeder cable and 1858 miles of unjacketed lateral cable (Ex. 9, p. 93; Ex. 9 workpapers, p. 547), for a total of 1948 miles of unjacketed branch cable (Ex. 9, p. 23). SDG&E further testifies that this unjacketed cable is responsible for 25 percent of all distribution outages (Ex. 9, p. 23), and that 25 percent of its unjacketed cable replacement work is proactive rather than being in reaction to cable failures (Ex. 9, p. 93). With regards to this testimony:

- a. Please confirm that CCUE's reading of SDG&E's testimony as set forth here is correct, and if not provide corrected numbers.
- b. Please provide the overall distribution outage amounts and the unjacketed cable outage amounts for each of the years 2008-14.
- c. For each of the years 2008-14 (actual) and 2015-16 (forecasted), please indicate:
 - i. The number of miles of unjacketed lateral cable as of the end of the year;
 - ii. The number of miles of unjacketed lateral cable proactively replaced during the year; and
 - iii. The number of miles of unjacketed lateral cable replaced after failure during the year.
- d. For each of the years 2008-14 (actual) and 2015-16 (forecasted), please indicate:

- i. The number of miles ofunjacketed feeder cable as of the end of the year;
 - ii. The number of miles ofunjacketed feeder cable proactively replaced during the year; and
 - iii. The number of miles ofunjacketed feeder cable replaced after failure during the year.
- e. By what year, if any, does SDG&E anticipate having replaced all of its unjacketed lateral cable?
- f. By what year, if any, does SDG&E anticipate having replaced all of its unjacketed feeder cable?
- g. What is the estimated 2016 cost per mile to replace unjacketed feeder cable after a cable failure?
- h. What is the estimated 2016 cost per mile to proactively replace unjacketed feeder cable?
- i. What is the estimated 2016 cost per mile to replace unjacketed lateral cable after a cable failure?
- j. What is the estimated 2016 cost per mile to proactively replace unjacketed lateral cable?

25. For each of the projects identified in SDG&E's capital addition workpapers as a FERC transmission project with associated distribution cost (E.g., Chapter 9 workpapers, pp. 856-935, and possibly others as well), please identify the associated FERC-jurisdictional transmission capital cost of the project for which recovery is not being sought in this GRC.

26. With regard to reliability improvements from vegetation management (Ex. 3, p. 5:25; Ex. 10, p. 7:20-22):

- a. Please clarify exactly what categories of outages have been reduced by SDG&E's vegetation management practices.
- b. Please provide the annual outage statistics for each year from 2008-14, inclusive, that underlie SDG&E's claim of a 75 percent improvement, and indicate which of those years are the basis for the claim.

27. SDG&E testifies that it plans to make \$31 million of capital expenditures over three years to improve distribution reliability, and \$17 million of capital expenditures over three years for the Borrego Springs micro-grid project (Ex. 9, pp. 112-114). Please provide any analyses or other studies by SDG&E showing the expected reduction in SAIDI and/or SAIFI from these capital expenditures, or any subset(s) of them.

28. Please confirm that SDG&E is not requesting any increase in either funding (beyond inflation) or staffing for troublemen, as apparently indicated by Ex. 10, pp. 16-17.

29. SDG&E indicates that new training programs will be needed because of demographic considerations (Ex. 10, pp. 22, 28-29). Please provide:

- a. Any SDG&E studies or analyses of the changing demographics of its workforce which underlie its need for new or expanded training programs.
- b. An explanation of whether it is correct, and if so why, that development of training programs will apparently require 8 FTEs for 3 years (Ex. 10, p. 25, indicating 49,000 hours for program development; 49,000 hours spread over the three-year duration of the GRC equates to 16,000+ hours/year, or 8+ FTEs each year).

30. For workers who are available to respond to electrical outages, please indicate:

- a. What broad job categories do those workers fall into (e.g., lineman, troubleman, trainee, etc.);
- b. For each category listed, what was the year end head count for that category for each of the years 2005-14, inclusive; and
- c. For each category listed, and for all categories cumulatively, what is the total number of employees SDG&E considers available to respond to electrical outages, as of each of the years 2005-14, inclusive.

31. For each category of worker identified in response to part (a) of the previous question, please provide:

- a. The number of workers in that category as of 12/31/14, by worker age (e.g., 50 linemen aged 64, 35 aged 63, 22 aged 62, and so on).
- b. The number expected to be eligible for retirement during 2016.

- d. The number expected to retire during 2016.
- e. The number of replacements expected to be hired during 2016.
- f. The expected headcount at the beginning and end of 2016.
- g. Any ongoing SDG&E programs or other efforts to deal with the demographic impacts of an aging workforce.
- h. Any SDG&E studies of aging workforce issues that addresses any of the categories of workers asked about in this question.

32. Please provide SDG&E's electrical customer count as of June 30 and December 31 of each year from 2005-14, inclusive, and (on a forecast basis) for 2015 and 2016.

33. With regard to SDG&E's proposals for performance incentives (Ex. 10, pp. 80 et seq.):

- a. Please provide a listing of the 10 worst performing circuits for SAIDI in each of the years 2009-14, inclusive.
- b. For each of the circuits identified in the previous response, please provide its SAIDI performance in each of the other years between 2009 and 2014 in which it was not one of the 10 worst performing circuits.
- c. Please provide a listing of the 10 worst performing circuits for SAIFI in each of the years 2009-14, inclusive.
- d. For each of the circuits identified in the previous response, please provide its SAIFI performance in each of the other years between 2009 and 2014 in which it was not one of the 10 worst performing circuits.
- e. To the extent any of the circuits identified in parts (a) and (b) of this question are located in the Borrego Springs area, please indicate how their SAIDI and SAIFI performance is expected to improve as a result of SDG&E's proposals for that area (Ex. 9, pp. 112-113).
- f. If none of the circuits identified in parts (a) and (b) of this question are in the Borrego Springs area, please reconcile that fact with the assertion that Borrego Springs-area circuits are among SDG&E's worst-performing (Ex. 9, pp. 112-113).

- g. Please provide any SDG&E projections of the company-wide SAIDI and SAIFI that it expects in each of the years 2016-18 if its requests in this GRC are approved.
- h. Please provide any analysis or other written documents in SDG&E's possession addressing the causes for the worsening of SAIDI and SAIFI performance in the last few years.
- i. Please provide SDG&E's company-wide SAIDI and SAIFI for 2014, with and without major events excluded.
- j. Please explain how SDG&E reconciles its proposal to reset SAIDI and SAIFI performance targets based on the most recent five years of historical data with its (adopted) proposal in the 6/6/14 Joint Petition of CCUE and SDG&E for an Annual Improvement Factor of 1 percent per year, beginning in the second year of a PBR period.
- k. Does SDG&E consider its PBR proposal for 2016 to be the second year of the PBR which is currently in effect for 2015? If not, why not?

34. For each of the following categories of equipment, please identify (i) the average of the equipment of that type on the SDG&E system, (ii) the percentage of that equipment that was replaced in each of the years 2010-14, inclusive, (iii) the percentage of that equipment that SDG&E intends to replace in each of the years 2015 and 2016:

- a. Wood poles in FERC Account E364;
- b. Steel poles in FERC Account E364;
- c. Other poles (non-wood, non-steel) in FERC Account E364;
- d. Circuit breakers in FERC Account E365;
- e. Conductor in FERC Account E365;
- f. Underground conduit in FERC Account E366;
- g. Underground conductors and devices in FERC Account E367; and
- h. Capacitors in FERC Account E368.2

35. Please provide a copy of the 2016 depreciation studies cited in Ex. 28, pp. 36-45.

36. With regards to SF6 switches:

- a. SDG&E proposes to replace both SF6 switches and certain underground switches (Ex. 9, pp. 63-64). Please identify how many, if any, of each category of switch to be replaced are also in the other category.
- b. SDG&E's SF6 testimony refers to replacing 900 switches over a 5-year period (Ex. 9 workpapers, p. 792) but also to replacing 200 switches per year (Ex. 9 workpapers, p. 796), which would be 1000 switches over 5 years. Please indicate:
 - i. How many SF6 switches does SDG&E have?
 - ii. How many does SDG&E plan to replace in each year from 2013-2018, inclusive?
 - iii. What number of switch replacements in 2016 is SDG&E seeking funding for?

37. With regard to underground (UG) switches:

SDG&E's testimony refers to a backlog of switches due for replacement (Ex. 9 workpapers, p. 286). Please indicate:

- a. How does SDG&E identify underground switches that need to be replaced?
- b. For each year from 2009-14, inclusive, how many underground switches were identified as needing to be replaced?
- c. For each year from 2009-14, how many underground switches were replaced?
- d. What is the expected lifetime of an underground switch?
- e. What is the average age of the current (year-end 2014) population of underground switches?
- f. How many underground switches were on the SDG&E system as of the end of each year from 2009-2014, inclusive?
- g. How many switches were in the backlog (identified for replacement, but not yet replaced) as of the end of each of the years 2009-2014, inclusive?

38. With regard to gas leak inspections and leak detection:

- a. Please indicate if the \$1.2 million per year expense for gas leak inspections (Ex. 4, p. 15:4 and pp. 17-18) represents SDG&E's total planned expenditures for gas leak detection? If not, please provide the planned expenditures for gas leak detection.
- b. What are SDG&E's planned expenditures in each year of this GRC cycle for gas leak remediation?
- c. Please describe the methodologies that SDG&E uses for gas leak detection, and the planned level of effort associated with each.
- d. Please describe the status of implementation at SDG&E of any advanced gas leak detection methodologies such as the Picarro remote leak detection methodology currently being phased into service by PG&E.
- e. Please provide any comparative data or studies in SDG&E's possession regarding leak detection rates **on the SDG&E system** for different leak detection methodologies.

39. With regard to OSHA recordable events (Ex. 2, p. 7:2; Ex. 3, p. 2:13):

- a. Please provide SDG&E's OSHA recordable rate for each of the years 2005-14, inclusive.
- b. What measures if any, is SDG&E proposing in this GRC to provide an incentive to continue reducing its OSHA recordable rate?

40. With regard to the economic cost of outages, and the corresponding value of service (VOS):

- a. Please provide SDG&E's most recent VOS study.
- b. When evaluating the cost effectiveness of measures that will affect reliability, what values does SDG&E use for reductions to:
 - i. The frequency of outages.
 - ii. The duration of outages.

- c. To the extent the answers to the previous question change from year to year (e.g., due to inflation), what values does SDG&E believe are most appropriate to use in evaluating capital additions made in 2016?

Dated: March 9, 2015

Respectfully submitted,

_____/s/_____

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