

**ORA DATA REQUEST**  
**ORA-SDGE-017-TXB**  
**SDG&E 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
**DATE RECEIVED: NOVEMBER 9, 2017**  
**DATE RESPONDED: NOVEMBER 27, 2017**

**Exhibit Reference:** SCG-03/SDG&E-03  
**SDG&E Witness:** Snyder & Clark  
**Subject:** Fueling Our Future (FOF) Policy/SDG&E

**Please provide the following:**

1. Table HS/RC-2 in Ex. SCG-03/SDG&E-03, p. HDS/RC-9, refers to the testimony of Debbie Robinson (Ex. SCG-30/SDG&E-28). While Table HS/RC-2 shows proposed savings of \$1.714 million, there does not appear to be any Fueling Our Future (FOF) discussion in Ms. Robinson’s testimony. Please provide a citation or testimony supporting Ms. Robinson’s proposed FOF savings.

**SDG&E Response 1:**

The discussion of the FOF savings of \$1.714 million shown in Table HS/RC-2 in Ex. SCG-03/SDG&E-03, p. HDS/RC-9 are discussed in the testimony of Debbie Robinson (Ex. SCG-30/SDG&E-28) and related workpapers as follows.

<b>Benefit Type</b>	<b>FOF Savings \$ in millions</b>	<b>Testimony Page Reference (Ex. SCG-30/SDG&amp;E 28)</b>	<b>Workpaper Page Reference (Ex. SDGE-28-WP)</b>
Medical	\$1.442	p. DSR-26, footnote 20	39 and 54
Dental	\$0.259		57 and 64
Vision	\$0.013		67 and 74
<b>Total</b>	<b>\$1.714</b>		

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2. Table HS/RC-2 in Ex. SCG-03/SDG&E-03, p. HDS/RC-9 refers to the testimony of Mia DeMontigny (Ex. SDG&E-26). While Table HS/RC-2 shows proposed savings of \$3.199 million, Ms. DeMontigny’s testimony states on p. MLD-3, ln. 21 that the proposed FOF savings for SDG&E are \$2.997 million. Please reconcile these figures and provide supporting workpapers.

**SDG&E Response 2:**

The difference between the two tables is that the figures in Ms. DeMontigny’s testimony are base costs while the figure referencing this chapter in Table HS/RC-2 is reflective of cost savings that had been escalated to 2019 dollars.

The dollar values in the Corporate Center – General Administration chapter (Chapters SCG-28 and SDG&E-26) are built using direct costs but then, unlike the majority of the chapters in Application 17-10-007/008, they are escalated within the Chapter workpapers using escalation rates developed in the testimony of Scott Wilder (Chapters SCG-40/SDG&E-39). Please see reference to Ms. DeMontigny’s testimony at page MLD-15. Most cost values in other chapters of the Application are created at the direct cost level, in constant 2016 dollars, but are escalated later in the process in the RO Model (See Khai Nguyen SCG-43/SDG&E-42) using escalation rates developed in the testimony of Scott Wilder (Chapters SCG-40/SDG&E-39). Therefore, what p. MLD-3 reflects as \$2.997 million is the same, but in constant 2016\$ costs as what is shown in Table HS/RC-2 in Ex. SCG-03/SDG&E-03 as \$3.199 million. In order to correct for this, Ex. SCG-03/SDG&E-03 Table HS/RC-2 will be updated at the earliest opportunity to be consistent with all other dollars presented in this table.

Please see below for a reconciliation of those costs.

Base Costs	SDG&E Allocation		Escalated Costs
	Escalation Rate		
<b>(1,315)</b> Labor	1.0849		<b>(1,426)</b>
<b>(1,683)</b> Non-Labor	1.0534		<b>(1,772)</b>
<b>(2,997)</b>			<b>(3,199)</b>

Escalation rates can be found in workpaper SCG-28/SDG&E-26-WP on page 426.

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3. Table HS/RC-2 in Ex. SCG-03/SDG&E-03, p. HDS/RC-9 refers to the testimony of Darren Weim (Ex. SDG&E-15). Ex. SDG&E-15 appears to be sponsored by William H. Speer. While Table HS/RC-2 shows proposed savings of \$8.483 million, Mr. Speer's testimony states on p. WHS-5, Table WS-3 that the proposed FOF savings for SDG&E are \$8.593 million. Please reconcile these figures and provide supporting workpapers.

**SDG&E Response 3:**

Mr. Speer assumed the role of GRC witness late in the process and Table HS/RC-2 in Ex. SCG-03/SDG&E-03 was not updated accordingly. SDG&E will correct this error at the earliest opportunity.

Table WS-3 in Ex. SDG&E-15 correctly lists the FOF impacts within each workpaper group, however, the row that is supposed to reflect the total of all impacts was not correct. The correct total is \$8.483 million. SDG&E will also correct this error at the earliest opportunity.