

ORA DATA REQUEST
ORA-SDGE-040-FH2
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE REVISED
DATE RECEIVED: DECEMBER 4, 2017
DATE RESPONDED: JANUARY 2, 2018

Exhibit Reference: SDG&E-31, page SKH-20

SDG&E Witness: Sandra K. Hrna

Subject: Legal

Please provide the following:

1. Referring to SDG&E's testimony, page SKH-5, line 7, please identify the procedures and explain how they were conducted to ensure the following costs were removed for ratemaking purposes:
 - a. Aliso-related costs in Legal and Claims
 - b. Aliso-related costs in Claims Payments & Recovery Costs

Provide supporting documents if available.

SDG&E Response 1:

SDG&E complied with the Commission Order by removing costs associated with the Aliso Canyon Storage Facility gas leak incident from the Test Year 2019 general rate case application. The process of removing costs associated with the Aliso Canyon Incident from 2015 and 2016 historical data is described in the testimony of Andrew Steinberg (Exhibit No.: SCG-12). See Section III, with emphasis on Section III.A. for witnesses with O&M forecasts. The process was applied to the Accounting and Finance, Legal, Reg Affairs and External Affairs Testimony, resulting in the necessary adjustments. The supporting documents can be found in workpapers as follows:

- a. See Exhibit No.: (SDG&E-31-WP) page 42 of 240 for the adjustment to remove 2016 Aliso Related Costs from historical data of Work paper 1AG006.000 – Oper CCTR-NSS-Legal.
- b. See Exhibit No.: (SDG&E-31-WP) page 49 of 240 for the adjustment to remove 2016 Aliso Related Costs from historical data of Work paper 1AG007.000 – Oper CCTR-NSS-Legal-Claims.

Note: The adjustments above are also represented in Exhibit No.: (SCG-12-WP) as part of Workpaper Table AS-28.

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2. Please identify legal and claims costs for each year from 2012 to 2016 that were removed from the recorded data provided in this GRC for the purposes of SDG&E forecasting its GRC request. Also explain how those costs removed for ratemaking purposes. Provide supporting documents if available.

SDG&E Response 2:

As described in the response to data request ORA-SDGE-040-FH2, question #1, the legal and claims costs associated with the Aliso Canyon Storage Facility natural gas leak incident (“Aliso Incident”) were excluded from the recorded data. Also excluded are legal and claims costs associated with the 2007 wildfires. Costs for the 2007 wildfires are tracked in the WEMA (Wildfire Expense Memorandum Account.) No other costs were excluded from the 2012-2016 recorded data.

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3. Referring to SDG&E workpaper page 51, please provide, in a working spreadsheet, a list of all claims payments and recovery expenses by year from 2012-2016 by including the following fields: the type of claim, description, cause, total amount paid for each claim, and the date each claim originated.

SDG&E Response 3:

For claims payments information, please see attachment “REVISED ORA-SDGE-040-FH2-Q3, 2012-2016 Claim Payouts, CONFIDENTIAL.xlsx” and note the areas shaded in gray color within this attachment are considered to be *Confidential Pursuant to PUC Code Section 583 & General Order 66-C /D, and D.16-08-024.*

For recovery costs information, a summary is provided on the last page of the above referenced confidential attachment (REVISED ORA-SDGE-040-FH2-Q3, 2012-2016 Claim Payouts, CONFIDENTIAL.pdf). Further break down of that information is not readily available and will take time to produce. That additional information will be made available January 22, 2018.