

**SDCAN DATA REQUEST
SDCAN-SDG&E-DR-04
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: JUNE 21, 2018
DATE RESPONDED: JULY 9, 2018**

Rebuttal Testimony of William Speer

1. Speer indicates at WHS-30 that Project Work Orders can't be completed in three to five days. The Conery Engineering testimony contained an error – the three-five days should have read *two-three weeks*. That error will be corrected on the record at the commencement of hearings. Please indicate whether Speer's testimony would be different, in light of this correction and, if so, in what fashion.

SDG&E Response 1: The testimony would not be different, as the same obstacles/challenges apply.

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2. At the same page, Speer's rebuttal testimony is predicated upon Conery Engineering's recommendation applying to electric distribution lines. However, the Conery Engineering testimony does not reference electric trenching or installation at all; it is limited to gas line installation and makes no mention of electric installations. Please indicate whether Speer's testimony would be different, in light of this clarification and, if so, in what fashion.

SDG&E Response 2: Although the Conery testimony does not specifically mention electric trenching or installations, the testimony provided by Mr. Shames does reference trenching and installation for electric lines. Regardless, the testimony would not be different, as SDG&E faces the same obstacles and challenges for gas-related activities.

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3. At pages WHS-28, Speer offers a chart that purport to show Gas Master Service Tracking. In regards to this chart please verify the following:

- a. The numbers refer to number of days
- b. The numbers are averaged
- c. The last column of both charts represents the number of days, on average, for PC release to completion of construction.
- d. That these numbers do not represent the average time it takes for SDG&E to perform a gas line installation once the project has received an inspection approval by an SDG&E inspector.
- e. That these numbers do not relate to missed inspection appointments.

SDG&E Response 3:

- a. Correct
- b. Correct
- c. Correct
- d. The numbers represent the average duration from when the SDG&E Project Coordinator notifies Construction Services that the inspection has been completed and the completion of the installation.
- e. Correct

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4. At pages WHS-29, Speer offers a chart that purport to show Tracking Tie-ins for Applicant installations. In regards to this chart please verify the following:
- a. The numbers refer to number of days
 - b. The numbers are averaged
 - c. That these numbers do not represent the average time it takes for SDG&E to perform a gas line installation once the project has received an inspection approval by an SDG&E inspector.
 - d. That these numbers do not relate to missed inspection appointments.

SDG&E Response 4:

- a. Correct
- b. Correct
- c. The numbers represent the average duration from when the SDG&E Project Coordinator notifies Construction Services that the inspection has been completed and the completion of the installation.
- d. Correct

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5. Please provide the raw data and workpapers upon which the two charts please at pages WHS-28 and 29 are based and indicate whether the data has been normalized for weather.

SDG&E Response 5:

Please see the accompanying files “SDCAN DR-04 Q5 Gas Master Services Data.xlsx” and “SDCAN DR-04 Q5 Tie-Ins for Applicant Installations Data.xlsx”. Data is not normalized for weather.

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6. In regards to the Gas Master Service Tracking chart, please provide narrative explaining what the second column “Duration: Job Ready to contractor start” means. Please include identification of the contractor referenced and how this data is obtained.

SDG&E Response 6:

This column indicates the duration time line between when the job package has been processed through the Construction Services department, the drawings have been verified and the job package is ready, the notification that the job is ready for construction is sent to the selected contractor, and when the contractor starts the project. This date of notification is recorded as the contractor notification date/job ready date.

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7. In regards to the Gas Master Service Tracking chart, fourth column “Duration: Start to Finish”, please confirm that this number represents the average amount of time it takes for the SDG&E crew to complete the gas line installation.

SDG&E Response 7:

The Duration Start-to-Finish column indicates the timeline between when the contractor starts the gas line installation and when the contractor completes the gas line installation.

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8. In regards to chart at WHS-29 that reads: “Tie-ins for Applicant installations”, please provide a narrative describing the meaning of “Duration: Job Ready to Constr. Start”.

SDG&E Response 8:

This column indicates the duration time line between when the job package has been processed through the Construction Services department, the drawings have been verified and the job package is ready, the notification that the job is ready for construction is sent to the selected contractor and when the contractor starts the project. This date of notification is recorded as the contractor notification date/job ready date.

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9. In regards to WHS-29, Speer states that SDG&E has contracted with dedicated crews for tie-in applicant installations. Please provide the following information:

- a. The number of contracted installers (individual workers) available for gas line installations
- b. The names of the contractors made available for gas line installations
- c. The number of gas line installations done by these contractors between December 2017 and May 2018

SDG&E Response 9:

- a. There are presently a total of six individual contractor workers typically available for gas main tie-ins.
- b. A.M. Ortega and ARB are the contractors used for gas main tie-ins.
- c. 81 gas main tie-ins have been completed by these contractors between December 1, 2017 and May 31, 2018.

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10. In regards to the rebuttal on reliability data at WHS-70, for each of the 13 outage events identified in the SDCAN testimony, please compare the data from the “internal weekly reports” to the “Geographic Information System”.

SDG&E Response 10:

Using data from the media reports provided by SDCAN, and comparing to the infrastructure locations in outage records within SDG&E’s reliability database, SDG&E has identified the outages provided within the attached document “02 SDCAN Outage Data Record.xlsx.” SDG&E submits this information as the official record of the events portrayed by the media, which is also the final record previously submitted in PBR filing. As mentioned previously, weekly reports serve as general status updates and are not intended to act as final auditable records for unplanned outages.

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11. In regards to the rebuttal on reliability data at WHS-70, please identify where in SDCAN's testimony that each of the 13 specific outages it cites were:

- a. Not represented in local media;
- b. Included planned outages;
- c. An instance where SDG&E was unable to compare the media reports to the SDG&E record;

SDG&E Response 11:

SDG&E responds as follows:

- a. There are no instances where outages in media records provided by SDCAN could not be found within the reliability database.
- b. None of the attached outages include planned outages.
- c. There are several instances of discrepancies when compared to media reports, most commonly customer impact. Upon review, in the majority of instances, the media reports understate reliability impacts as compared to the reliability database.

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12. Please identify the specific page numbers at which SDG&E’s Reply to Protest of Advice Letter 3217-E: Distribution PBR Reliability Performance Incentives for 2017 referenced at footnote 140 can be found in Speer’s rebuttal testimony.

SDG&E Response 12:

The references to “SDG&E’s Reply to Protest of Advice Letter 3217-E: Distribution PBR Reliability Performance Incentives for 2017” can be found in Will Speer’s rebuttal testimony on pages 68-70.

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Rebuttal Testimony of Jerry Stewart

13. At JDS-22, Stewart states: “SDCAN has not been truthful in its description of correspondence with SDG&E...” Please identify with specificity the “untruthful” statements or asserted facts SDCAN made in its May 15, 2018 testimony that are at odds with the facts available to SDCAN at the time its testimony was served.

SDG&E Response 13:

On page 43 in the prepared testimony of Michael Shames, SDCAN stated “SDCAN’s position is informed by a specific and fully-documented experience with SDG&E’s EV-TOU rate program during the 2017-2018 time period that caused a customer’s average electric rate to increase by upwards of 20%.” SDCAN continued on page 44, “SDG&E was entirely unresponsive to the customers repeat inquiries” and “never responded or complied with the customer’s request”.

SDG&E was not “entirely unresponsive” as SDCAN states. As described in Exhibit SDG&E-218, page JDS-22, the experience was also not fully documented. Appendix C omits an email response from SDG&E on October 17th, 2017, which is a response confirming his change to his optionally elected rate in May of 2017. The response was to an email received on October 16th, 2017 asking for confirmation that the rate change was processed. In addition, the monthly bills the customer began receiving as of June 2017 reflected the EVTOU2 rate chosen by the customer.

SDCAN also stated on page 43, “This fairly sophisticated electric customer’s repeated request for bill protection and shadow billing was ignored by SDG&E”.

SDG&E responded to the customer email dated 5/1/2018 on 5/22/2018. SDG&E does recognize the response to the customer, dated May 22, 2018, occurred after SDCAN filed their testimony. The May 22, 2018 email stated:

Hello [customer name],

Thank you for contacting us with your electric rate and billing concerns. This email is to confirm that your rate has been returned to DR effective your next read date. Your June billing statement will reflect this.

As for your request to be presented with Shadow Billing and Bill Protection information, we are unable to provide this to you. While certain Time of Use Tariffs do have provisions and requirements for SDG&E to calculate and provide this information, Schedule EVTOU2 does not.

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Please feel free to contact us with any additional questions or concerns.

Thank you,

SDG&E – Rate Support Team

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Rebuttal Testimony of Gwen Marelli

14. At GRM-22, Marelli asserts that “recently discovered” issue created 153 erroneous Service Guarantee credits. Please specify the date that this “discovery” was made and a narrative explaining why SDG&E’s data response to SDGAN was not updated with this information.

SDG&E Response 14:

The information on the 153 erroneous service guarantee credits was discovered after receiving intervenor testimony while preparing rebuttal testimony.

This information did not change the count and credits for 2017, which is the information SDGAN requested, so SDG&E did not update its response on SDGAN-SDG&E-DR-03.

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15. Please indicate whether SDG&E found any errors in its 2014-2016 Service Guarantee data contained in Figure 9 of Shames' testimony.

SDG&E Response 15:

SDG&E did not find errors in the Service Guarantee data for 2014 - 2016 shown in Figure 9 of Shame's testimony.

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16. At GRM-22, Marelli asserts that emergency orders directly impact missed appointment numbers. Please provide the number of emergency orders that caused missed appointments logged by the Customer Contact Center for each of the years 2010 through 2017.

SDG&E Response 16:

Ms. Marelli does not assert a one-to-one direct relationship between P1 orders and missed appointments; however, it is one of several factors that may cause missed appointments. Page GRM-22, lines 4-5 states, “SDG&E’s goal is to respond to all P1 orders within 60 minutes of a customer’s call; therefore, it is sometimes necessary for SDG&E CS-F to divert field technicians from their prescheduled work appointments to respond to P1 orders within the 60 minutes. This redirection of resources sometimes creates missed appointments.”

SDG&E does not track the number of emergency orders that would have caused the missed appointments.

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17. Please provide a narrative explanation explaining why customers who have been inconvenienced by a missed appointment due to an emergency order should not be fully compensated for the time they've had to make available for that appointment.

SDG&E Response 17:

SDG&E has no control on the volume or timing of emergency orders received. SDG&E has a public service obligation to respond to emergency orders within a timely manner to ensure customer safety (see response to Question 16). This takes priority over other orders scheduled for the day. Any order that may be missed due to an emergency order is completed as soon as possible.

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18. Please provide the factual basis upon which SDG&E has determined that a service guarantee of \$50 is sufficient to compensate a customer inconvenienced by a missed appointment.

SDG&E Response 18:

In Decision 99-05-030, the Commission adopted customer service guarantees and the associated customer credits if SDG&E fails to fulfill those guarantees.

SDG&E's Service Guarantee Credit amount is also consistent with those provided by other California investor-owned utilities.