UCAN DATA REQUEST
UCAN-SDG&E-DR-05
SDG&E 2019 GRC – A.17-10-007
SDG&E PUBLIC RESPONSE
DATE RECEIVED: MARCH 29, 2018
DATE RESPONDED: MAY 1, 2018

General

1. In Sempra's 2016 GRC Phase 1 (A.14-11-003), UCAN requested shareholders' rates of return on ratebase for SDG&E's and SoCalGas' CPUC-regulated electric and gas businesses for the years 2012 through 2014 (UCAN DR-001-Q02). In response, Sempra provided 2012 and 2013 data showing 1) Net Operating Income, 2) Depreciated Electric Distribution & Gas Ratebase, and 3) Rate of Return for each operating utility, separately for the electric and gas businesses. This response was included in the record as an attachment to UCAN's testimony in A.14-11-003 and is attached to this data request for convenience.
    a. With regard to each of the 2012 and 2013 data points provided in this response:
        i. Please provide a specific citation (including data source, page number, and website, where available);
        ii. Please provide the equivalent data for the years 2014, 2015, and 2016 (as available) from the data source identified in subpart (i) or from an update to that data source. If the equivalent data are not available for any of the years 2014-2016, please explain why information that was previously provided is no longer available and specify when (if ever) Sempra expects the data to become available.
        iii. Please clarify whether depreciated electric generation ratebase is included in the electric ratebase amounts shown and if not, please explain why not and please specify whether the electric net operating income includes generation-related income.
        iv. Please confirm that the 2012-2013 data and calculations provided in the data response are correct. If any of these data or calculations are not correct, please correct them and please explain the source of the error.
    b. Please provide the following data on SDG&E's CPUC-regulated electric operations for each of the years 2014 through 2016 (as available) and provide the source for each data point:
        i. Net Operating Income,
        ii. Depreciated Generation Ratebase,
        iii. Depreciated Distribution Ratebase, and
        iv. Rate of Return.

    If any of these data are not available, please specify when (if ever) Sempra expects the data to become available.

Question 1:-Continued

c. Please provide the following data on SDG&E's CPUC-regulated gas operations for each of the years 2014 through 2016 (as available) and provide the source for each data point:

   i. Net Operating Income,

   ii. Depreciated Ratebase, and

   iii. Rate of Return.

   If any of these data are not available, please specify when (if ever) Sempra expects the data to become available.

d. Please provide the following data on SoCalGas' CPUC-regulated gas operations for each of the years 2014 through 2016 (as available) and provide the source for each data point:

   i. Net Operating Income,

   ii. Depreciated Ratebase, and

   iii. Rate of Return.

   If any of these data are not available, please specify when (if ever) Sempra expects the data to become available.

e. If the 2014-2016 data provided in response to questions 1(b)-1(d) are from different sources than those relied on for the 2012 and 2013 data, as specified in response to questions 1(a) (e.g. SEC Form 10k rather than FERC Form 1), please explain why a different data source is now being used and explain whether there are differences in what is being reported in each dataset and, if so, how the two datasets can be reconciled.

f. If any of the data requested in questions 1(b)-1(d) are not available from any data source, please explain why SDG&E and SCG were previously able to provide such data for 2012 and 2013 and are no longer able to provide comparable data and specify when (if ever) Sempra expects the data to become available.

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SDG&E Response 1:

1.a.i SDG&E and SoCalGas are unable to provide specific citations for the line items provided. This report is the result of an extensive analysis comparing FERC Form 1 data with internal SAP data to arrive at a calculated CPUC jurisdictional return look. SDG&E and SoCalGas do not maintain accounting systems that hold this specific data in this form, and it would take a lengthy exercise to derive these numbers.

1.a.ii. Attached please find the same report for the 2014 year (See "UCAN DR-05 Q1 SDGE SCG 2014 ROR.xlsx"). Data after 2014 is not available in the level of detail shown in the 2014 report. This report is no longer required and due to the time required to produce this report, SDG&E and SoCalGas no longer produce it. SDG&E and SoCalGas have no reason to produce this in their normal course of business. CPUC no longer requires this report in this way. However, please see the summarized information for 2015 to 2016 found in the attachments: "UCAN DR-05 Q1 SCG ROR ROE 2015-2016.xlsx" and "UCAN DR-05 Q1 SDGE ROR ROE 2015-2016.xlsx".

1.a.iii. The Electric numbers at SDG&E include Generation.

1.a.iv. SDG&E and SoCalGas have not re-produced the report for 2012 or 2013 and therefore the schedule from the prior case is still the latest version we have. To our knowledge, nothing has changed.

1.b Please see the file referred to in 1.a.ii above for this information. A breakout of generation from total Electric has not been calculated and is not available. SDG&E has no need for a separate Generation breakout in the normal course of business and therefore does not have that breakout available. Again, 2015-2016 information is not calculated at the requested level of detail and is not available.

1.c. Please see the file referred to in 1.a.ii. above for this information. Again, 2015-2016 information is not calculated at the requested level of detail and is not available.

1.d. Please see the file referred to in 1.a.ii. above for this information. Again, 2015-2016 information is not calculated at the requested level of detail and is not available.

1.e. 2014 was calculated in the same manner as the prior 2013 and 2012 information. Again, 2015-2016 information is not calculated at the requested level of detail and is not available.

1.f. Please see 1.a.ii. for the explanation.

2. Decision 14-12-025 states, "We also adopt the recommendation of the Refined Straw Proposal for the utility's GRC filing to provide information on how it addressed or incorporated the concerns expressed in the RAMP application by SED, and by other parties" (p. 40).

   a. Please identify each of the changes made to Sempra's GRC filing to address or incorporate the concerns expressed by SED and by other parties in the RAMP proceeding (I.16-10-015 and I.16-10-016). Please include specific citations for each of these changes.

   b. For any expenditure that was increased, reduced, deferred, or accelerated in response to concerns expressed in the RAMP proceeding, please identify the original and revised amount of the expenditure in each year and provide a citation(s) to a comment(s) made in the RAMP proceeding that addresses this change or the expenditure in question.

SDG&E Response 2:

a. SoCalGas and SDG&E object to this request on grounds that it seeks information that does not exist in the requested format, would be burdensome to create, and could be created by UCAN. Subject to and without waiving this objection, SoCalGas and SDG&E state as follows:

As discussed in the testimony of RAMP to GRC Integration witness Jamie York (Exhibit SCG-02-R/SDG&E-02-R, Chapter 3), "The Companies' RAMP evaluation and showing was also influenced by feedback received from the Safety and Enforcement Division (SED) and intervenors during the RAMP process. The feedback regarding specific mitigation activities is addressed, to the extent possible, by the GRC witness assigned to that particular activity. Overarching feedback, such as including the risk-spend efficiency calculation or suggested modifications to the Companies' risk management processes, is discussed in Ms. Day's testimony [Exhibit SCG-02-R/SDG&E-02-R, Chapter 1]."[1] Another example of where feedback is addressed is in the Direct Testimony of SoCalGas Pipeline Integrity for Transmission and Distribution witness Maria Martinez (Exhibits SCG-14 and SDG&E-11). In its evaluation report, SED recommended that SoCalGas and SDG&E consider applying dynamic segmentation analysis on their pipeline system.[2] In response, Ms. Martinez states in her testimony "At a programmatic-level, dynamic segmentation is already being applied as a part of our early vintage replacement program analysis where we assess individual pipeline segments and relatively rank them by evaluating pipeline segment performance. This type of

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[1] Direct testimony of Jamie York, Exhibit SCG-02-R/SDG&E-02-R, Chapter 3, at JKY-4 lines 8-14. A.17-10-007/-008 (December 20, 2017).

[2] Risk and Safety Aspects of Risk Assessment and Mitigation Phase Report of SDG&E and SoCalGas at 7, I.1610-015/-016 (March 8, 2017).

SDG&E Response 2 Continued:

analysis helps us look at specific mitigation activities and how to prioritize our work."[3] In another example, Ms. Day's testimony discusses comments from SED's evaluation report and from parties regarding the risk spend efficiency calculation and the risk management methodology of SoCalGas and SDG&E (*see* SCG-02-R/SDG&E-02-R, Chapter 1, Section II.B.3, beginning at DD-15).

Perhaps the most significant change in the GRC resulting from feedback provided through the RAMP process is how SoCalGas and SDG&E presented RAMP mitigation activities in the GRC. This was to address SED's comments to provide "detailed explanation explaining how proposed mitigations are tied to funding requests in the GRC and how incremental dollars address safety and risk mitigation."[4] A dedicated RAMP section was included in those witnesses who sponsor RAMP mitigation activities to explicitly explain (1) the risk(s) addressed in the witness' testimony; (2) how the risk(s) influenced the GRC request; (3) qualitatively the benefits of the RAMP mitigation activity; and (4) if there were other projects, programs, or approaches that were considered but dismissed. Additionally, the RAMP mitigation activities were discussed in the "traditional" cost drivers section of testimony as well as in new RAMP-specific workpapers.

b. Please see the separately attached spreadsheet "UCAN-SDG&E-05_Q2b_RAMP Mapping.xlsx." Please note that this spreadsheet contains data for both SoCalGas and SDG&E. Prior to reviewing or analyzing the information contained in the spreadsheet, please read the information on the Overview and Disclaimers tab. As noted on the Overview and Disclaimers tab, this spreadsheet reflects the information put forth in the revised testimony exhibits of SoCalGas and SDG&E, submitted on December 20, 2017. Please note that the tax-related exhibits submitted on April 6, 2018 did not impact the information contained in this spreadsheet. The RAMP-related cost information by line item is presented in the spreadsheet on the O&M RAMP Data and Capital RAMP Data tabs. These two tabs have detailed information and can be further filtered by header row, such as Company, RAMP risk, GRC witness, etc. For your reference, we have provided two summary tabs, O&M Summary Pivot and Capital Summary Pivot, to illustrate that the information in the spreadsheet is consistent with the tables included in Appendix A.2 of the Revised Testimony of Risk Management and Policy witness Diana Day (Exhibit SCG-02R/SDG&E-02-R, Chapter 1). Lastly, the tab labeled RAMP Risk List is being included for informational purposes.

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[3] Direct Testimony of Maria T. Martinez, Exhibit SDG&E-11, at MTM-7 lines 9-13, Exhibit SCG-14, at MTM-10 lines 19-23. A.17-10-007/-008 (October 6, 2017).
[4] I.16-10-015/-016. Proposed Decision Closing Risk Assessment and Mitigation Phase Proceedings, at 9.

SDG&E Response 2 Continued:

The RAMP range for each applicable activity or line item is also provided in the spreadsheet. The RAMP range and calculations in Columns R & S on the O&M RAMP Data tab and Columns W, X, Y, & Z on the Capital RAMP Data tab were specifically requested by ORA in data request ORA-SCG-090-NS4. We are including it in this response for your convenience. The RAMP range included in the spreadsheet reflects the amounts shown in GRC workpapers, which were entered by the GRC witness teams. GRC witness teams did not consistently translate the estimated RAMP range from the RAMP Report to their GRC workpapers. In other words, the RAMP range reflected in the GRC workpapers may not always align with the range put forth in the RAMP Report. This largely occurred because RAMP mitigation activities may not have cleanly mapped to a single witness area, forecast adjustments or line items due to how the teams entered the activities into our GRC forecasting application. This issue is discussed in further detail in the direct testimony of Jamie York (SCG-02-R/SDG&E-02-R, Chapter 3, section F). For example, as Ms. York explains on pages JKY-10 and JKY-11, some GRC teams entered adjustments as an aggregated amount (i.e., multiple activities were entered as one line item), while others split costs for one activity between multiple workpapers based on where the costs are recorded. This would result in consolidating or splitting the ranges that appeared in the RAMP Report. Another example is, if a GRC team entered an activity as multiple adjustments, the RAMP range may have been duplicated by the GRC team, since a RAMP range is associated with each adjustment. In other instances, the GRC witness team may have interpreted the RAMP range for a particular subject matter, resulting in the range from the RAMP Report being partially represented. Because of the foregoing, the calculations requested in this question and any comparisons based on the calculations should not be taken as a defining data point. Further, SoCalGas notes that the ranges presented for purposed of the RAMP Report's risk assessment were superseded by the specific funding requests made in supporting testimony in the GRC.

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The following questions relate to Mr. Malik's testimony (SCG-44)

3. Consistent with SDG&E's response to ORA-SDG&E-DR-002, Q3, please provide a separate working Excel spreadsheet (i.e., which includes active links and working formulas) which contains all of the calculations presented in Ex. SDG&E- 43-WP, but modified to include recorded capital additions from 2013 and 2014 in order to calculate and reflect a 7-year averaging methodology of capital additions which could be used as a proxy for the post-test year capital additions (instead of the 5-year averaging methodology which SDG&E proposes). This spreadsheet should also include the underlying data from the additional two years, such as the recorded 2013 and 2014 capital additions and capital retirements, the corresponding relevant capital escalation rates, and the escalated 2013 and 2014 capital additions and capital retirements expressed in 2019$ which are used in the averaging methodology.

SoCalGas Response 3:

SoCalGas submitted its GRC supplemental testimonies and workpapers related to the Tax Cuts and Jobs Act (TCJA) on April 6th, 2018. Please see attachment "SoCalGas-44_2R_JMalik_PTY_Workpaper_Hypothetical 7 Year Average.xlsx" for the post-test year model updated to reflect the TCJA impact and a hypothetical scenario that uses a seven-year averaging methodology of capital additions, capital retirements, and corresponding relevant capital escalation rates. However, as stated in witness Jawaad Malik's testimony, SoCalGas believes a five-year average of capital additions is more appropriate for the post-test year mechanism as it better captures the current utility business environment (refer to page 8 of the testimony).

4. Regarding SCG workpaper "SCG-44-WP-R_JMalik_PTY_Workpaper.xlsx," please confirm or deny the following:
   a. The PSEP capital expenditures that SCG proposes including in its PTY attrition revenue requirement increases as described on page JAM-9 are shown on tab "PTY Detail" in cells A33:F33, and there are no PSEP-related capital costs embedded elsewhere in SCG's PTY results. If this is not correct, please explain where else PSEP-related capital costs are embedded in these results.
   b. Switching the "Include PSEP Pet Model" input at cells N4:O4 of tab "PTY Detail" from "Yes" to "No" produces PTY attrition results that exclude PSEP costs. If this is not correct, please explain what other changes must be made to the workpapers to produce PTY attrition results that exclude PSEP costs, and provide any additional data required to make these changes.

SoCalGas Response 4:

4a. The PSEP-related capital costs shown on tab "PTY Detail" in cells A33:F33 represent the incremental PSEP capital-related costs not fully reflected in the TY 2019 revenue requirement, as stated in witness Jawaad Malik's testimony (JAM-9 and JAM-10). This adjustment is necessary because majority of PSEP capital expenditures are expected to close to plant in service in 2020, 2021, and 2022, and therefore the associated capital-related costs are not fully reflected in the TY 2019 revenue requirement. The capital-related costs for PSEP capital expenditures that are expected to close to plant in service by 2019 are reflected in the TY 2019 revenue requirement.

4b. By switching the "Include PSEP PET Model" input at cells N4:O4 of tab "PTY Detail" from "Yes" to "No" produces PTY attrition results that exclude PSEP capital-related costs for the PSEP capital expenditures that are expected to close to plant in service in 2020, 2021, and 2022 only. In order to remove all PSEP capital-related costs, the PSEP capital expenditures that are expected to close to plant in service in 2019 will need to be removed from the Results of Operations (RO) model.

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The following question relates to Mr. Deremer's testimony (SDG&E-43)

5. Please clarify whether SDG&E's proposed PTY attrition revenue requirements include revenue requirements related to PSEP capital expenditures. If so, please identify 1) where they are included in workpaper "SDG&E-43-WP-R-KDeremer_PTY.xlsm," and 2) which input values in the file include PSEP capital expenditures and the total amount of these PSEP-related inputs.

SDG&E Response 5:

SDG&E's proposed PTY attrition revenue requirement does not include revenue requirement related to PSEP capital expenditures.

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The following questions relate to Ms. Jasso's testimony (SDG&E-41)

6. SDG&E is proposing a new Liability Insurance Premium Balancing Account (LIPBA) that would "record the difference between 1) the authorized revenue requirement to be adopted in this TY 2019 GRC specific to liability insurance premiums charged to SDG&E as set forth in the Corporate Center – Insurance testimony of Neil Cayabyab (Exhibit SCG-29/SDG&E-27) and 2) the actual incurred and recorded expenses." (p. NGJ-13) With regard to this proposal:
   a. Please provide SDG&E's actual incurred and recorded liability insurance premium expenses in each year from 2008 through 2017.
   b. Please provide the forecast of liability insurance premium expenses that SDG&E submitted in the applicable GRC proceeding in each year from 2008 through 2017.

SDG&E Response 6:

a. SDG&E objects to the question on the grounds that it is outside the scope of and not relevant to this proceeding to the extent that it seeks data beyond the five years of recorded data (2012-2016) set forth in the Rate Case Plan. Subject to and without waiving this objection, SDG&E responds as follows. Please refer to UCAN DR-05 Question 6 2012-2017.xlsx which details the liability accounts that will be a part of the LIPBA account. The aforementioned attachment provides 2012-2017 actuals. In order to provide historical costs prior to this time period, SDG&E is attaching an excerpt from workpapers in the prior GRC (TY2016) from the insurance witness. Please refer to attachment "UCAN DR-05 Q6a TY2016 SDG&E-21-WP_KCarbon_Corp_Insurance.pdf" for those costs. 2008 data is not available. These costs represent the allocated amounts to the utilities.

b. SDG&E objects to the question on the grounds that it is outside the scope of and not relevant to this proceeding to the extent that it seeks data beyond the five years of recorded data (2012-2016) set forth in the Rate Case Plan. Subject to and without waiving this objection, SDG&E responds as follows. The attachment "UCAN-SDG&E-DR-05 Q6b.xls" provides forecasted liability insurance data, respectively, for the years from 2008 through 2017 in which it is readily available. The 2008 and 2009 forecast information is not readily available because GRC's in that time period were produced and litigated in FERC accounts and SDG&E is unable to find liability insurance premium expense data for that time period. In addition, 2013 is also unavailable. In the 2012 GRC, 2013 was not forecasted and in the subsequent GRC (TY2016) 2013 was shown as actuals; therefore, there was no forecast produced for 2013 liability insurance premium expenses.

7. SDG&E is proposing a new Third-Party Claims Balancing Account (TPCBA) that would "record the difference between the authorized revenue requirement and actual expenses specific to transactions associated with third-party-related claims as set forth in the Accounting and Finance/Legal/Regulatory Affairs/External Affairs testimony of Sandra K. Hrna (Exhibit SDG&E-31)." (pp. NGJ-13 – NGJ-14) With regard to this proposal:
   c. Please provide SDG&E's actual incurred and recorded third-party claims expenses in each year from 2008 through 2017.
   d. Please provide the forecast of third-party claims expenses that SDG&E submitted in the applicable GRC proceeding in each year from 2008 through 2017.

SDG&E Response 7:

c.-d. SDG&E objects to the question on the grounds that it is outside the scope of and not relevant to this proceeding to the extent that it seeks data beyond the five years of recorded data (2012-2016) set forth in the Rate Case Plan. Subject to and without waiving this objection, SDG&E responds as follows. The attachment "UCAN DR-05 question 7.xlsx", provides actual and forecasted claims data for the years from 2008 through 2017 in which it is readily available. The 2008 and 2009 forecast information is not readily available because GRC's in that time period were produced and litigated in FERC accounts and SDG&E is unable to find claims expense data for that time period. In addition, 2013 is also unavailable. In the 2012 GRC, 2013 was an attrition year. In the next GRC, the 2016 GRC, 2013 was shown as actuals; therefore, there was no forecast produced for 2013 claims expenses.

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The following questions relate to Mr. Stewart's testimony (SDG&E-18)
AMO – Residential TOU Mass Default

8. Please provide the following data:
    a. A list of the investigation and troubleshooting activities that fall under the definition of "meter exceptions" as used on lines 21-24 of page JDS-16 of the testimony, that require back-office support
    b. Average time to resolve each of the activities listed in part (a) of this question
    c. A list of "meter exceptions" that require "field-technician related activities" as used on lines 30-31 of page JDS-16 of the testimony
    d. Average time to resolve each of the activities listed in part (b) of this question

SDG&E Response 8:

a. An exception that requires back-office support refers to any meter that does not have actual data for some or all intervals at the time of billing. Typical investigation and troubleshooting activities include; verify meter exists in applications, re-call meter to retrieve missing data, verify days with missing data in Meter Data Management System (MDMS), verify meter configuration, perform a manual estimation of missing data, create field service orders, analyze previous service orders and check meter events.

b. The average time to resolution is not tracked for individual exception types due to the significant difference in time it takes to resolve one meter over another for the same issue type. Rather, SDG&E tracks the average number of TOU exceptions resolved per back office employee. Please refer to "AMO 100001.000 Supplemental Workpaper 2 – Residential TOU Mass Default Forecast Calculations" for supporting data.

c. Meter exceptions observed in field typically fall into the following exception types; fatal error, non-registered meter, wrong meter number, meter removed, incorrect meter program ID, time synch errors and no connectivity to the mesh network.

d. The average time to resolution is not tracked for individual exception types. The field technicians follow a process or checklist that resolves the issue or results in a meter change. As a result, SDG&E tracks the average number of orders worked per field technician by service order type. Refer to "AMO 100001.000 Supplemental Workpaper 2 – Residential TOU Mass Default Forecast Calculations" for the number of orders worked per field employee.

9. Please provide the source and/or analysis supporting the daily exception rate of 250 meters/day in 2016 and SDG&E's projected daily exception rate of 955 meters/day in 2019 (p. JDS-16)

SDG&E Response 9:

Please refer to "AMO 100001.000 Supplemental Workpaper 2 – Residential TOU Mass Default Forecast Calculations".

10. Please provide the source and/or analysis supporting the troubleshooting rate of 50 accounts/day for each back-office analyst (p. JDS-16)

SDG&E Response 10:

Please refer to "AMO 100001.000 Supplemental Workpaper 2 – Residential TOU Mass Default Forecast Calculations".

11. Please provide the source and/or analysis for the troubleshooting rate of 19 meters/day for each Single Phase Meter Technician (p. JDS-17)

SDG&E Response 11:

Read orders are performed by several job classifications; Electric Meter Testers (EMT), Electric Meter Tester Apprentice (EMTA) and Single Phase Meter Technician (SPTs). The calculation is based on number of read orders to the actual read hours. In 2016, there were 19 orders per FTE per day for read orders. SPT's are the lowest classification that can investigate and troubleshoot residential electric meters.

12. Please provide the number of exceptions per month per TOU billed account for each of the years 2012-2017 broken down to show the following:

    e. Total number of exceptions

    f. Exceptions that require back office support further broken down by categories as provided in response to question 1(a)

    g. Exceptions that require field visits further broken down by categories as provided in response to question 1(c)

    h. Please provide any forecasts that may exist for future years for parts a, b, and c of this question

SDG&E Response 12:

e. See table below for average daily back office exceptions and average fielded monthly exceptions by year. SDG&E tracks by meter, not by billed account.

	2012	2013	2014	2015	2016	2017
Total Interval Billed (TOU) Meters	19,192	33,133	40,615	68,370	190,354	231,048
Avg. Daily Back Office Meter Exceptions	n/a*	n/a*	n/a*	60	250	300
Avg. Fielded Monthly Meter Exceptions	n/a*	n/a*	n/a*	504	960	1,048

*2012-2014 the number of exceptions were not tracked.

f. SDG&E clarifies that this question references 8a, and not 1a, and with this clarification SDG&E responds as follows. SDG&E does not track exceptions to that level of detail. Exception tickets are generated as a result of missing some or all interval data at the time of billing. Each exception must be analyzed to determine the root cause of the missing data.

g. SDG&E clarifies that this question references 8c, and not 1c, and with this clarification SDG&E responds as follows. SDG&E does not track exceptions to that level of detail.

h. SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the ground that the request is vague and ambiguous in its reference to "parts a, b, and c of this question." Subject to and without waiving the foregoing objection, SDG&E assumes the question refers to subparts e, f, and g, and responds as follows:

SDG&E Response 12 Continued:

As it pertains to Residential TOU Mass Default, the forecasted exceptions are described in AMO 1OO001.000 Supplemental Workpaper 2. Rows 2-7 identify the monthly fielded exceptions and rows 22-23 identify the back-office exceptions.

13. Please explain the potential impacts of the implementation of SDG&E's CIS Replacement Project and other IT investments (such as those addressed in SDG&E-24) on AMO activities, such as frequency of meter exceptions, time required to resolve exceptions, and proportion of exceptions that can be handled through back-office support rather than field visits. For example, if these investments enhance customers' self-service capabilities, how could this impact the number of exceptions that SDG&E staff must address?

SDG&E Response 13:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E has not factored in any benefits for this GRC related to the CIS replacement project. As it relates to "other IT investments", JDS-16 lines 26-29, JDS-18 lines 14-20, and JDS-71 lines 16-27 identify the IT capital projects that are expected to deliver efficiencies related to AMO activities.

14. Please state whether SDG&E has filed its Mass Default Advice Letter as described on lines 10-12 of page JDS-11. If so, please state the Advice Letter number and whether the Commission has issued a Resolution approving or rejecting it. Please provide a copy of the Advice Letter and any Resolution addressing it.

SDG&E Response 14:

SDG&E clarifies that this question references page JDS-17, and not JDS-11, and with this clarification SDG&E responds as follows. SDG&E did not file a "Mass Default Advice Letter" as reflected on JDS-17 lines 11-12, and was instead ordered to file an application in Q4 2017. SDG&E filed its Rate Design Window (RDW) Application (A.17-12-013), which included its plan for Mass Default TOU, on December 20, 2017. On April 10, 2018, President Picker, jointly with ALJs Tsen and Park, issued an Amended Scoping Memo and Ruling in the RDW Application reflecting a schedule anticipating a Final Decision in December 2018.

15. Please explain SDG&E's contention that Residential TOU Mass Default is a one-time activity. Please also clarify whether SDG&E is indicating that its requested incremental resources discussed in this testimony will be required for only one year, rather than on an ongoing basis, to facilitate the transition of residential customers to default TOU rates

SDG&E Response 15:

The activity of converting 800,000 customers from register billed to interval billed is a one-time activity. The exceptions forecasted as a result of this activity are expected to remain consistent beyond TY 2019. Therefore, the incremental AMO resources requested in Exhibit SDG&E-18, page JDS-16, Residential TOU Mass Default, will be required on an ongoing basis.

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BILLING

16. Please provide a detailed description of the job-responsibilities and activities of each of the following job-titles:
    i. Billing Supervisor
    j. Billing Analyst
    k. Billing Team Lead
    l. Billing Adviser
    m. Business Systems Analyst

SDG&E Response 16:

Please see UCAN-SDG&E-DR-05-Q16 Attachment.

17. On Page JDS-18, SDG&E states that additional resources will be needed to address billing items related to the implementation of regulatory measures such as the TY 2016 GRC Phase 2, the Residential TOU pilot, and the Residential TOU Mass Default. Please discuss how SDG&E's CIS Replacement Program impacts the Billing Operations team's implementation of regulatory changes such as these, and explain why the SDG&E requires incremental Billing Operations resources despite implementation of a new CIS.

SDG&E Response 17:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. SDG&E further clarifies that this question references page JDS-19, and not JDS-18. Subject to and without waiving the foregoing objections and clarification, SDG&E responds as follows:

SDG&E did not factor in CIS in this GRC. The requested GRC incremental contract resources are required to bridge the gap until the new CIS solution is implemented, which isn't expected until 2021.

18. Please provide the categories of events that fall under "billing exceptions" as used in line 9 of page JDS-22 of the testimony

SDG&E Response 18:

Examples of events that fall under Billing Exception Categories:

- Bill Calculation Edit
- Billing Attribute Verification
- Consumption Edit
- Electric Vehicle
- NEM
- Post Bill
- Prebill
- Rate Eligibility
- RES-TOU Pilot Rates
- RYU
- Shadow Billing
- Smart Meter Billing Edits
- VNM

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19. Please provide the number of billing exceptions broken down by categories as provided in response to question 7, for each month for all years from 2012-2017, and any forecasts that may exist for future years

SDG&E Response 19:

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the ground that the request is vague and ambiguous in its reference to "question 7." Subject to and without waiving the foregoing objection, SDG&E assumes the question refers to Question 18 and responds as follows:

The table below details billing exceptions for 2012-2017 and forecasts for 2018-2019.

Category	2012	2013	2014	2015	2016	2017	2018 [1]	2019 [1]
Bill Calculation Edit	4,932	16,743	5,208	8,456	257,596	12,444	13,560	15,000
Billing Attribute Verification	9,559	9,729	11,665	13,244	11,716	3,734	4,068	4,500
Consumption Edit	24,573	23,917	31,723	29,739	21,315	21,147	23,040	25,500
Electric Vehicle	0	0	0	0	147	424	468	516
NEM	60	83	172	399	162	238	264	288
Post Bill	55,573	43,905	36,592	33,287	34,356	38,663	42,120	46,620
Prebill	205,083	188,832	166,053	179,152	633,454	381,689	416,724	461,292
Rate Eligibility	610	3,473	14,853	10,796	5,645	8,768	9,552	10,572
RES-TOU Pilot Rates	0	0	0	0	841	868	0	0
RYU	11,874	888	531	225	133	99	108	120
Shadow Billing	0	0	90	1,598	108,891	1,775	1,932	2,136
Smart Meter Billing Edits	10,006	4,768	4,991	11,577	154,569	85,359	92,988	102,924
VNM	6,676	8,602	8,951	14,634	37,539	68,007	74,076	82,008
Total	328,946	300,940	280,829	303,107	1,266,364	623,215	678,900	751,476

[1] 2018 and 2019 monthly details and totals are forecasted using 2017 data and a projected increase in work items due to RES-TOU Mass Default

20. On page JDS-22 SDG&E states that "The volume of billing exceptions also increased significantly due the instability of SDG&E's aging billing system, causing a large number of delayed bills." SDG&E also referenced a similar statement made in its Application for Authority to Implement the Customer Information System (CIS) Replacement Program (A.17-04-027), in which SDG&E cited the same instance of delays caused by an aging billing system as a rationale for requiring a new CIS.

    In SDG&E's estimation, how much of the increased volume of billing exceptions will be alleviated due to the implementation of a new CIS?

SDG&E Response 20:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E did not factor in CIS in this GRC. The requested GRC incremental contract resources are required to bridge the gap until the new CIS solution is implemented, which isn't expected until 2021.

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21. On page JDS-21 SDG&E states that "Interval data billing applies to customers billing on TOU rate schedules and Schedule NEM-Successor Tariff (ST). Customers billing on interval data may bill with shadow billing and bill protection. As we saw in BY 2016, the billing system had trouble handling the complexity of these rate schedules." With regard to this statement:

    n. Does SDG&E expect that its new CIS, once its CIS Replacement Program has been completed, will be better able to handle the complexity of these rate schedules?

    o. Does SDG&E expect that its incremental IT costs as proposed in SDG&E-24, such as its non-shared IT Applications costs discussed on page CRO-11, will allow SDG&E to better handle the complexity of these rate schedules?

SDG&E Response 21:

n. SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E did not factor in CIS in this GRC.

o. SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request seeks the production of information that is outside the scope of Mr. Stewart's testimony and would call for speculation.

22. Please clarify whether SDG&E's Residential TOU Mass Default would result in a growth in interval billed accounts. If so, please explain difference between SDG&E's need for incremental "Growth in Interval Billed Accounts" resources to "support and maintain the growth of interval data billed accounts" (page JDS-22) and its need for incremental "Residential TOU Mass Default" resources to "support the roll out of the new residential TOU rates and the on-going monthly billing of these rates." (page JDS-23)

SDG&E Response 22:

Yes, SDGE's Residential TOU Mass Default will result in growth of interval billed accounts. Please refer to the testimony starting on page JDS-21, Section a. Growth in Interval Billed Accounts through page JDS-23 Section b. Residential TOU Mass Default. Both sections reference two incremental cost drivers that are independent of one another. Billing 1OO002.00 Supplemental Workpaper 1 outlines the increase of interval data meters in 2016 related to the small and medium business time-of-use default. Billing 1OO002.00 Supplemental Workpaper 3 reflects the incremental number of interval billed accounts related to new residential TOU rates, starting in 2018.

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23. On page JDS-23 SDG&E expresses concern that Residential TOU Mass Default will result in "Increasingly complex billing exceptions and manual workarounds." How much of the potential increase in SDG&E's volume of billing exceptions resulting from the Residential TOU Mass Default does SDG&E expect to be alleviated by the implementation of a new CIS?

SDG&E Response 23:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E did not factor in CIS in this GRC.

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CUSTOMER CONTACT CENTER

24. Please provide the basis for the estimation that billing calls will increase by over 167,000 in 2019 and 82,000 in 2020 as a result of the residential TOU mass default (pp. JDS-53 – JDS-54). Please provide any sources/analysis that were used to arrive at this estimation

SDG&E Response 24:

The 2019 forecast assumed 0.5 calls per customer from 800,000 customers who will be defaulted to a TOU rate (0.5 * 800,000 = 400,000 calls). In 2016, there were a total of 233,00 billing related calls. Since these calls were already embedded in CCC Call Volume Forecast, we reduced the estimate by 233,000 calls for a net increase of 167,000 billing related calls. For 2020, SDG&E forecasted 0.3 calls per customer from 1,050,000 total customers who will be defaulted to TOU rate (0.3 * 1,050,000 = 315,000) then reduced the estimate by 233,000 existing calls for a net increase of 82,000 billing related calls.

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25. Please provide a list of categories (e.g. bill questions, switching from default to opt-in rates, general rate inquiries) for the billing calls discussed on line 26 of page JDS-53, the number of calls of each type, and the average handle time for each type of call for all years from 2012-2017. Please also provide a forecast for years 2018-2019.

SDG&E Response 25:

SDG&E has been tracking two billing-related categories: high bills and general billing questions including rate information. SDG&E does not track the granularity of general billing questions such as opt-in, rate questions, rebills, bill delays, bill exceptions. Below is the summary of billing categories SDG&E tracks and associated handle time for those categories. The tables contain actual data from 2012-2017. Billing related calls volumes and average handle time for 2018 and TY2019 were embedded in CCC Operations 1OOO006.000 Supplemental Workpaper 2 – Call Volume Forecast. Billing related calls specific to Residential TOU Mass Default can be found in CCC Operations 1OOO006.000 Supplemental Workpaper 5 – Residential TOU Mass Default.

Billing categories - Call Volume		
Year	**High Bill**	**General Billing Questions**
2012		
2013	14,241	219,533
2014	36,273	423,463
2015	37,507	146,448
2016	33,528	199,422
2017	37,004	215,818

SDG&E Response 25 Continued:

Billing categories - Average Handle Time (seconds/call)		
Year	**High Bill**	**General Billing Questions**
2012		
2013	431	260
2014	444	277
2015	497	343
2016	507	394
2017	504	400

26. Please provide a breakdown of the total ESS calls in Table JS-26 by categories as requested in question 18.

SDG&E Response 26:

As stated in the answer to Question 25, SDG&E does not track the granularity of general billing questions, which would include bill exception events.

27. Please provide a breakdown of the data in Table JS-27 by categories as provided in question 18.

SDG&E Response 27:

As stated in the answer to Question 25, SDG&E does not track the granularity of general billing questions, which would include bill exception events.

28. Please explain how the assistance that CCC agents provide customers on complex billing issues, as stated on page JDS-49, differs from the "complex billing data analytics" assistance provided by Billing Advisors and Billing Analysts, as discussed on pages JDS-23 – JDS-24.

SDG&E Response 28:

CCC agents are front-line employees who speak and interact with customers directly when customers call. CCC agents assist customers with the following regarding complex billing issues:

- Analyzing the account and working with the customer to identify any concerns
- Reviewing various rates and providing the customer with choices to determine which rate option would benefit the customer's specific needs
- Discussing the specific energy usage with the customer and providing ways to conserve
- Upon any errors identified by the agent, the agent will send a detailed message to the billing department to advise so corrections can be made
- When billing corrections on an account have been made, the CCC agent will provide detailed information to the customer

Billing Advisors and Billing Analysts are back-office employees in the Billing Department; they do not speak to nor interact with customers. A team of Billing Analysts are responsible for the analysis, design and documentation of the billing process. Billing Analysts also provide staff training on bill processing methodologies and testing coordination of Sarbanes-Oxley compliance. Billing Advisors provide internal support for daily work assignment, billing exceptions, as well as research support into the scenarios causing various exceptions. Billing Advisors also analyze segment and group billing exceptions for effective and efficient issue resolution, they provide reports that will streamline workload and resource allocation.

29. Please explain whether and how SDG&E expects the implementation of a new CIS to impact Customer Contact Center activities, such as time required to resolve calls.

SDG&E Response 29:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the request calls for speculation, and seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E did not factor in CIS in this GRC.

The following questions relate to Ms. Davidson's testimony (SDG&E-19)

30. Please provide a list and a description of topics and issues that will be covered in the Dynamic Pricing load impact studies that SDG&E expects to conduct (LCD-47). In case the requirements for the current study differ from prior studies, please outline such differences.

SDG&E Response 30:

The load impact studies provide ex post and ex ante estimates of the load impacts used to report on the performance of SDG&E's demand response (DR) activities. Typically, DR programs and dynamic rates are initiated when SDG&E or CAISO is experiencing peak conditions. The historical or ex post load impact estimates, along with weather and enrollment forecasts are inputs into the 10-year forecast of load impacts referred to as ex ante load impacts. The ex ante load impacts are also used in long term resource planning.

Dynamic Pricing and Time of Use (TOU) Studies include:

1. Critical Peak Pricing (CPP) Large and Medium Commercial and Industrial customers,
2. Default small commercial CPP and TOU
3. Default agricultural CPP and TOU
4. Voluntary residential CPP and TOU
5. Peak Time Rebate (PTR) – marketed as Reduce Your Use (RYU) will sunset 12/31/18
6. Default Residential TOU 2019-2022 – load impact evaluation starts in 2019

The items below describe the topics that are covered in the Dynamic Pricing load impact studies.

- Executive summary
- Introduction and Purpose of the Study
- Ex-Post and Ex-Ante Study Methodology
- Ex-Post Load and Ex-Ante Impacts Estimates
- Comparison of Ex-post and Ex-Ante Load Impacts
- Recommendations

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31. Please provide the annual cost of conducting SDG&E's DR load impact studies for each year from 2012-2017. If these costs differ from year-to-year, please explain the reasons for these differences.

SDG&E Response 31:

Below are the calendar year expenses for SDG&E's DR load impact studies from 2012-2017 funded through various proceedings. Please note these load impact studies are not conducted on an annual basis, but on a program year (PY) basis, which runs May1st – October 31st. The load impact evaluations start in October and are filed with the Commission on April 1st each year.

All DR Studies	2012	2013	2014	2015	2016	2017
Total	$ 680,541	$ 1,334,620	$ 919,904	$ 878,120	$ 999,636	$ 966,966
Note: all dollars are nominal and have not been adjusted to 2016 constant $'s						

There are several reasons why demand response study costs can vary from year to year:

1. In some cases, process evaluations are conducted in addition to load impact evaluations and those are not annual. There were process evaluations conducted over the 6-year time frame for CPP, PTR and Auto DR.
2. The Demand Response Measurement & Evaluation Committee (DRMEC) may conduct additional studies that have a specialized focus, i.e., PTR Baseline Analysis, CAISO Baseline Assessment, among others.
3. In 2013, the dynamic pricing costs changed because PTR transitioned from a pilot to a dynamic rate and was evaluated under the applicable protocols[1]. SDG&E did four separate PTR studies as compared to the one pilot evaluation conducted the year before. These additional studies included Residential PTR Load Impact, Small Commercial PTR Load Impact, Process Evaluation and PTR Baseline Analysis.
4. In 2016, small commercial and agricultural customers were defaulted onto CPP as well as any remaining medium commercial, agricultural and industrial customers. The PY2016 dynamic rate load impact study costs increased because of that. Additionally, time of use rates are included in the dynamic rate studies as time of use load impacts are included in the demand response protocols.[2]

Beginning in TY 2019 SDG&E will conduct residential TOU load impacts.

[1] D.08-04-050 requires that SDG&E perform annual studies of all DR activities using the adopted load impact protocols.
[2] Per Section 5 of the Demand Response Protocols (Attachment A) adopted in D-08-04-045.

32. Please provide the annual cost of conducting SDG&E's dynamic pricing load impact studies for each year that SDG&E has performed such studies.

SDG&E Response 32:

Calendar Year									
Dynamic Rates & TOU	2009	2010	2011	2012	2013	2014	2015	2016	2017
DR Funded	$ 274,565	$ 284,356	$ 349,890	$ 254,065	$ 674,458	$ 555,215	$ 361,510	$ 393,412	
GRC Funded								$ 88,087	$ 529,849
Total	$ 274,565	$ 284,356	$ 349,890	$ 254,065	$ 674,458	$ 555,215	$ 361,510	$ 481,499	$ 529,849
Note: all dollars are nominal and have not been adjusted to 2016 constant $'s									

33. Please explain why SDG&E requires $469,000 in incremental non-labor funding for its dynamic pricing load impact studies at this time and describe the incremental contributions that SDG&E expects this additional funding to provide.

SDG&E Response 33:

As described in Exhibit SDG&E-19, on page LCD-47, D.08-04-050 requires that SDG&E perform annual studies of all DR activities using the adopted load impact protocols. In addition, section 7.3, page 19 of D.12-12-004, which adopts critical peak pricing and TOU rates for residential and small commercial customers, requires SDG&E to separately report the load reduction achieved through these rates annually. Ordering paragraph 15 on page 73 of D.12-12-004 states that SDG&E can request cost recovery in a future GRC for ongoing costs related to dynamic pricing. The TOU load impact studies follow the demand response summer event season that concluded on October 31, 2016. The load impact evaluations commence shortly thereafter. Therefore, the O&M expenses reflected in the 2016 base year forecast are only a portion of the annual cost due to the program year start date/transition year of funding sources. Most of the costs associated with load impact studies for DR PY2016 were captured in the first four months of 2017. When looking at 2017, which is reflective of a full-year spend on a calendar year basis (portions of 2 separate program years) the cost for dynamic pricing load impact studies was $530K. The estimated amount to be spent on these GRC-funded dynamic pricing load studies is $550K per year, so when taking into consideration the $89K expensed in the 2016 base year, $469K was added as an incremental forecast for 2017-2019 to create a normalized year of expected costs for load impact studies forecasted at $550K per calendar year.

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34. Please explain the step-by-step process required to conduct the Dynamic Pricing load impact study and please provide the actual or estimated costs associated with each step (whichever is available).

SDG&E Response 34:

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that the unfair overbreadth and burden of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding. Subject to and without waiving the foregoing objections SDG&E responds as follows:

See the table below for each step and estimated costs.

PY17 Estimated Dynamic Pricing load impact study costs by task

Dynamic Rates and TOU Load Impact Study costs for program year 2017						
Task	**Description**	**Default Small Commercial Critical Peak Pricing**	**Critical Peak Pricing (CPP)**	**Voluntary Residential CPP**	**Residential Time of Use (TOU)**	**Peak TimeRabate (PTR)**
Task 1	Conduct Project Initiation Meeting	$1,115	$1,940	$9,710	$1,000	$1,138
Task2	Develop Measurement and Evaluation Plan	$1,710	$2,630	$4,020		$1,024
Task 3.1	Data Collection and Validation	$3,783	$29,000	$18,416	$14,064	$5,029
Task 3.2	Ex Post Impact Analysis	$14,703	$96,720	$30,580	$23,290	$16,607
Task 3.3	Ex Ante Impact Analysis	$7,820	$57,920	$29,320	$20,650	$6,143
Task 4	Prepare Reports	$7,820	$37,320	$4,020		$4,887
Task 5	Presentation of Results (Load Impact Workshop)	$1,830	$10,920	$11,720	$1,000	$3,715
Task 6	Project Management and Progress Reporting	$2,970	$4,140			$7,542
Task 7	Database Documentation	$1,400	$9,040			$2,308
	Budget	**$43,151**	**$249,630**	**$107,786**	**$60,004**	**$48,392**