

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

**(A.22-09-015)**

**DATA REQUEST DR PAO-SCG & SDG&E-002-MPS FROM CAL ADVOCATES**

**DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 1**

Please provide a copy of the Rate Design in Microsoft Excel format:

**Response 1:**

See the following Excel files:

- CalAdvocates-002\_Ch13\_GasRatesSCG\_TCAP\_pink
- CalAdvocates-002\_Ch13\_GasRatesSDGE\_TCAP\_pink

a) Please Highlight in color pink the costs, values, amounts that flow from the Long Run Marginal Cost Study to the Tables in Chapter 13.

**Response 1a).**

The costs, values, amounts that flow from the Long Run Marginal Cost Study to calculate the Tables 1- 4 in Chapter 13 are highlighted in the Excel files provided in Response 1.

b) Please provide for all the Tables (1-11) in Chapter 13 the source, reference to the LRMC study in chapter 9 and 10 or other chapters including the file name, tab name, cell column and row number that connects to the Tables in Chapter 13.

**Response 1b).**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP. The underlying data for Tables 1-4 shown in Response 1a can be found in the following:

- Ch 9\_SCG 2024TCAP LRMC Customer Costs – tab: RD Format, row 7
- Ch 9\_SCG 2024TCAP LRMC Distribution Costs – tab: Out\_MP\_LRMC, row 35
- Ch 10\_SDGE 2024TCAP LRMC Customer Costs - tab: Output, row 10
- Ch 10\_SDGE 2024TCAP LRMC Distribution Costs – tab: Dist MC, row 38

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- c) If there are no costs, values or amounts that flow from the LRMC study to the Tables in Chapter 3, please provide all supporting documentation, including workpapers in Microsoft Excel format that include all formulas, source, calculations, active cells, and links showing how the amounts or values were derived.

**Response 1c).**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP. Listed below are all supporting documentation to each table:

- Table 1 – SoCalGas Natural Gas Transportation Rates (2022-2024) – Ch13\_Gas Rates SCG – TCAP, tab: Rate Summary 2024
- Table 2 – SDG&E Natural Gas Transportation Rates (2022-2024) – Ch13\_Gas Rates SDGE – TCAP, tab: Rate Summary 2024
- Table 3 – SoCalGas Natural Gas Transportation Rates (2025-2027) - Ch13\_Gas Rates SCG – TCAP, tab: Rate Summary 2025-2027
- Table 4 – SDG&E Natural Gas Transportation Rates (2025-2027)- - Ch13\_Gas Rates SDGE – TCAP, tab: Rate Summary 2025-2027
- Table 5: Current and Proposed Residential Fixed Customer Charge 2 and Volumetric Rates Ch13\_Table 5. Ch13\_Gas Rates SCG – TCAP, tab: Rates, rows 105 - 106
- Chart 1: Partial Electrification Scenario: CARE Bill Impacts Now And 2035 - Ch13\_Partial Electrification, Fixed Charge and CARE Bill – SoCalGas, Ch 13 SCG TCAP Bill Impact Summary - CARE - Half Vol 10% Cust Red, cells J5, K5, J18, K18, AC5, AD5, AC18, AD18
- Table 6: SoCalGas’s Residential Minimum Connection Cost Per Month - Ch 9\_SCG 2024TCAP LRMC Customer Costs with SC Summary, tab: Summary Table for SC Testimony, rows 28 and 29
- Table 7 - SDG&E’s Residential Minimum Connection Cost Per Month - Ch 10\_SDGE 2024TCAP LRMC Customer Costs Min, tab: For Testimony, rows 17 - 20
- Table 8 – SoCalGas Average Residential Bills – Ch 13 Tables 8 and 9, lines 8 -13, Ch13\_Gas Rates SCG – TCAP, tab: Res Bill Zone 1, Rows 199 and 538
- Chart 2: Illustrative SoCalGas Annual Bill Impacts - Ch13\_SCG TCAP Bill Impact Summary – CARE
- Table 9 – SDG&E Average Residential Bills - – Ch 13 Tables 8 and 9, Rows 30 - 34, Gas Rates SDGE – TCAP, tab: Res Bill, rows 99 and 538
- Table 10: SoCalGas SGIP Cost Allocation – Ch 13 SoCalGas SGIP Allocation Data, Tab: Summary, Rows: 3 -9
- Table 11: Ch 13 SDG&E SGIP Cost Allocation, Ch 13 SDG&E SGIP Data Request, Tab: Incentives Summary, Rows 22: 26

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**Question 2**

2. Regarding Table 7 page 23 in Chapter 13, please answer the following:

- a) Please provide how these amounts were calculated. Please indicate the file name, tab name, cell column and row number that connects to the LRMC study or other chapters where the calculations be found.

**Response 2a).**

Please see Response 1c, listed under Table 7 and file: Ch 10\_SDGE Rate Base – 2021 SRM.

- b) Please provide the cost broken down for each method including an explanation of why they are different. Provide everything in Microsoft Excel format that includes all formulas, source, calculations, active cells, and links.

**Response 2b).**

Please see Response 1c, listed under Table 7 Ch 10\_SDGE Rate Base – 2021 SRM. An explanation as to why they are different is provided in Chapter 13, Appendix C.

- c) If these costs are in 2021, please update this cost broken down with 2022 costs side by side in Microsoft Excel format that includes all formulas, source, calculations, active cells, and links.

**Response 3c).**

SoCalGas and SDG&E object to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the LRMC in SoCalGas' and SDG&E's? testimony does not include recorded data for 2022 and SoCalGas and SDG&E further object that undergoing such a study at this time is unduly burdensome.

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d) Please provide the same a) through c) for Table 6.

**Response 3d).**

Please see Response 1c, listed under Table 7 and file: Ch 9\_SCG Rate Base 2021 – SRM.

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**Question 3**

3. Regarding chart 2 on page 25 please provide an analogous chart illustrative for all residential customers by number of gas appliances.

**Response 3:**

SoCalGas and SDG&E object to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the bill impacts analysis in chart 2 in this testimony does not include gas appliances.

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**Question 4**

4. Regarding workpapers CH13\_gasrates SCG-TCAP.xlsx cell BC:64. Provide all source data materials and all formulas, source, calculations, active cells, and links.

**Response 4:**

During a meeting on May 25, 2023, between SoCalGas and Cal Advocates, Cal Advocates advised SoCalGas that this question would be re-asked with clarification on which worksheet is being referenced; therefore, SoCalGas will respond at a later time to the subsequent forthcoming data request.

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**Question 5**

5. Please answer the following hypothetical questions:

a) If a new residential customer joins in 2024 (assuming the customer applied after July 2023), please answer the following questions:

i. Will they be required to pay the monthly fixed charge?

**Response 5a)i.**

Yes.

a. If yes, where are these costs going to be allocated?

**Response 5a)ia.**

The costs will be allocated as shown in Chapters 9 Direct Testimony of Marjorie Schmidt-Pines (SoCalGas) and Chapter 10 Direct Testimony of Michael Foster (SDGE).

ii. It is Cal Advocates' understanding that such a customer will be required to fund their own customer connections cost. Would the customer be paying for their own customer connections charges and the socialized cost of other customer connections (for example via the rental method)?

**Response 5a)ii.**

Yes.

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**Question 6**

6. Does Chapter 13 account for D.22-09-026 which disallows line extension allowances after July 1, 2023?

**Response 6.**

No.

- a) Where within the LRMCS or Rate Design was this incorporated or is being illustrated. Please provide a reference if yes.

**Response 6a).**

Not applicable.

- b) If not, please explain why not?

**Response 6b).**

D.22-09-026 was issued in September 2022. SoCalGas's and SDG&E's Cost Allocation Proceeding Application was also filed in September 2022 with the most updated cost studies.

- c) Please describe in detail what effect this will have on all the methods for SCG and SDG&E within Tables 6 & 7. Please illustrate in a Microsoft Excel spreadsheet showing the connection cost per month and all calculations, formulas, active cells and links.

**Response 6c).**

SoCalGas and SDG&E object to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the LRMC or Rate Design in the testimonies do not include analysis of D.22-09-026.

- i. Please illustrate the impact if there is a 5% increase in new customer connections forecast.

**Response 6c)i.**

In SoCalGas' Table 6, a +0.2% percentage change would result from increasing the new customer connections forecast by 5%, all else being equal for the NCO Method with Replacement Cost.

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In SDG&E's Table 7, a +0.4% percentage change would result from increasing the new customer connections forecast by 5%, all else being equal for the NCO Method with Replacement Cost.

- ii. Please illustrate the impact if there is a 5% decrease in new customer connections forecast.

**Response 6c)ii.**

In SoCalGas' Table 6, a -0.2% percentage change would result from decreasing the new customer connections forecast by 5%, all else being equal for the NCO Method with Replacement Cost.

In SDG&E's Table 7, a -0.4% percentage change would result from decreasing the new customer connections forecast by 5%, all else being equal for the NCO Method with Replacement Cost.

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**Question 7:**

7. Please update the LRMCS and Rate Design to flow through Table 6 and 7 with the following scenarios:

- a) Provide all scenarios in Microsoft Excel format that includes all formulas, source, calculations, active cells, and links. All results should be illustrated in the same format as Table 6 and 7.

**Response 7a).**

Not applicable. See Response 7b.

- b) Scenario #1:

- i. Incorporate the customer forecast supported by Cal Advocates for SCG and SDG&E in Exhibit CA-18 for the 2024 General Rate Case.

**Table 18-1  
SCG TY2024  
Average Annual Total Active Gas Meters**

Class Schedule	Cal Advocates Recommended			SCG Proposed		
	2022	2023	2024	2022	2023	2024
Residential Single-family	3,810,623	3,828,745	3,847,512	3,814,617	3,839,406	3,863,332
Residential Multi-family	1,850,227	1,860,389	1,870,704	1,857,865	1,875,644	1,893,115
<b>TOTAL</b>	<b>5,660,849</b>	<b>5,689,134</b>	<b>5,718,215</b>	<b>5,672,482</b>	<b>5,715,050</b>	<b>5,756,447</b>

**Table 18-2  
SDG&E TY2024  
Average Annual Total Active Gas Customers**

Class Schedule	Cal Advocates			SDG&E Proposed		
	2022	2023	2024	2022	2023	2024
Total Residential	876,462	885,236	893,981	880,418	888,738	896,990

**Response 7b)i.**

SoCalGas and SDG&E object to this request on the ground that it is beyond the scope of the witness’s testimony inasmuch as SoCalGas and SDG&E’s testimony does not include this analysis and undergoing such an analysis is unduly burdensome.

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- ii. Please illustrate the effects if all the new customers' requests are filed after July 1, 2023.

**Response 7b)ii.**

SoCalGas and SDG&E object to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as SoCalGas and SDG&E's testimony does not include analysis of D.22-09-026, Phase III Decision Eliminating Gas Line Extension Allowances, Ten-Year Refundable Payment Option, and Fifty Percent Discount Payment Option Under Gas Line Extension Rules, and SoCalGas and SDG&E further object that undergoing such a study at this time is unduly burdensome.

- iii. Please illustrate the effects if half of the new customers' requests are filed after and the other half before.

**Response 7b)iii.**

See Response 7b)ii.

- iv. Please provide a comparison side by side with SCG and SDG&E current proposals.

**Response 7b)iv.**

See Response 7b)ii.

c) Scenario #2:

- i. Incorporating D.22-09-026 illustrating the effect on the residential customer capital cost for all methods.

**Response 7c)i.**

See Response 7b)ii.

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d) Scenario #3:

- i. 100% of the connections requested in the TCAP period (2024 -2027) will be filed after July 1, 2023.

**Response 7d)i.**

See Response 7b)ii.

e) Scenario #4:

- i. 50% of the connections requested in the TCAP period (2024 -2027) will be after July 1, 2023, and the remainder after.

**Response 7e)i.**

See Response 7b)ii.

f) Scenario #5:

- i. 20% of the connections requested in the TCAP period (2024-2027) will be after July 1, 2023, and the remainder after.

**Response 7f)i.**

See Response 7b)i.

g) Scenario #6:

- i. Incorporating D.22-09-026 illustrating the effect on the residential customer capital cost for all methods.

**Response 7g)i.**

See Response 7b)ii.

- ii. Assuming all base margin increases are granted in full for SCG and SDG&E.

**Response 7g)ii.**

See Response 7b)ii.

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h) Scenario #7

- i. Incorporating D.22-09-026 illustrating the effect on SCG and SDG&E fixed customer charge proposals within the Rate Design model.

**Response 7h)i.**

See Response 7b)ii.

- ii. Please illustrate the effect on Residential non-CARE fixed customer charge proposal for (2024-2027).

**Response 7h)ii.**

See Response 7b)ii.

- iii. Please illustrate the effect on Residential CARE fixed customer charge proposal for (2024-2027).

**Response 7h)iii.**

See Response 7b)ii.

- iv. Please indicate what cost from SCG and SDG&E the fixed charge will cover and why if the line extension allowances are not included in the above scenarios.

**Response 7h)iv.**

See Response 7b)ii.

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- v. Please provide a comparison side by side in Microsoft Excel spreadsheet the breakdown of what the current minimum bill of \$4 per customer per month for Residential non-CARE covers and Residential CARE minimum current bill covers. Please provide what did the minimum bill cover in the last TCAP 2020 for non-CARE and CARE. Please include the breakdown.

**Response 7h)v.**

The non-CARE and CARE residential minimum bill covers a portion of the SDG&E residential revenue requirement. Costs are not specifically assigned to the residential minimum bill.

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**Question 8:**

8. Please provide the list of all the contractors, subcontractors and builders or government agencies that have signed up for the program for the line extension allowances before July 1, 2023. Applicants object to this request to the extent it misstates facts and that the phrase "signs up" is inapt in this context as parties do not "sign up." If the customer has a new line extension project and submits an application to SoCalGas before 7/1/23, those projects will qualify for allowance under the current tariff rules which allows for allowance/refund/discount. For line extension project applications SoCalGas receives from the customers on or after 7/1/23, those projects will not get any allowance per the applicable tariff rules at that time. Notwithstanding, Applicants further object that providing a list of all such parties is irrelevant and unduly burdensome
- a) For Table 6 and 7 please provide all costs broken down and the amounts included in the calculations for all the Methods in Table 6 and 7 connection cost that will be recoverable from residential customers for new customers that sign connections after July 1, 2023.

**Response 8a).**

SoCalGas and SDG&E object to this request on the grounds that it is beyond the scope of the witness's testimony inasmuch as SoCalGas and SDG&E's testimony does not include analysis of D.22-09-026, Phase III Decision Eliminating Gas Line Extension Allowances, Ten-Year Refundable Payment Option, and Fifty Percent Discount Payment Option Under Gas Line Extension Rules, and SoCalGas and SDG&E further object that undergoing such a study at this time is unduly burdensome.

- b) Provide all source data, formulas, calculations, active cell, and links of how the calculations were derived.

**Response 8b).**

Not applicable.

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**Question 9:**

9. Regarding Table 10 and 11, page32, please answer the following:

a) What years Table 10 and 11 included.

**Response 9a).**

Years 2019 to 2021

b) Please update Table 10 and 11 including 2022 recorded amounts.

**Response 9b).**

2022 recorded amounts are not readily available.

c) Please provide all source data, formulas, calculations, active cell, and links of how the proposed % allocation was derived.

**Response 9c).**

Please refer to supplemental response to DR-A2209015-PAO-SCG-SDGE-WP sent on May 16, 2023 for following Excel files:

- Ch 13 SoCalGas SGIP Allocation Data
- Ch 13 SDG&E SGIP Cost Allocation

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**Question 10:**

10. Regarding line 16-22 page 27 and line 1–9, Chapter 13: Please answer the following questions:

- a) Please explain in detail what other proposals did SCG considered if the Two-Tier residential fixed customer charge proposal is not approved.

**Response 10a).**

SoCalGas proposed a non-income differentiated fixed cost proposal in their previous CAP proceeding. However, in the current CAP proceeding, SoCalGas has not considered alternative proposals.

- b) What other options or proposals did SCG consider for the six-month freeze.

**Response 10b).**

SoCalGas did not consider other options or proposals during the “freeze” period if SoCalGas’s CIS proposal is adopted in the GRC.

- c) Please indicate what tab within the Rate Design Model includes the scenario with and without the Two-Tier residential fixed customer charge.

**Response 10c).**

Ch13\_Gas Rates SCG – TCAP, in the tabs, column M represents Scenario TCAP 1/1/2024 (without the Two-Tier residential fixed customer charge) and column represents TCAP 1/1/2025 (with the Two-Tier residential fixed customer charge). The transmission and storage is also different between these scenarios.

- i. If not, please provide the reference where the Two-Tier residential proposal can be adjusted. Include file name, tab name, cell, and column number.

**Response 10c)i.** Not applicable.

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**Question 11:**

11. Regarding the results for the customer-related capital costs for SCG and SDG&E.

- a) Please indicate where within the LRMCS can this cost be found, file name and tab name.

**Response 11a).**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP.

- Ch 9\_SCG 2024TCAP LRMC Customer Costs, tab: cust 5 CAPEX
- Ch 10\_SDGE 2024TCAP LRMC Customer Costs, tab: SRM Cost Rental

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**Question 12:**

12. Regarding the new customer hookups for residential, small core commercial and industrial customers in SCG's and SDG&E service territory.

- a) Please indicate where within the LRMCS can this cost be found, file name and tab name.

**Response 12a).**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP.

- Ch 9 \_SCG 2024TCAP LRMCS Customer Costs, tab: Cut MUC, Row 111
- Ch 10 \_SDGE 2024TCAP LRMCS Customer Costs, tab: Cust LRMCS, line 42

- b) Please indicate if SCG and SDG&E incorporate the Commission's decision in D.22-09-026 when forecasting this cost.

**Response 12b).**

No.

- c) If not, please explain.

**Response 12c).**

D.22-09-026 was issued in September 2022. SoCalGas's and SDG&E's Cost Allocation Proceeding Application was also filed in September 2022 with the most updated cost studies.

- d) If yes, please provide file name and tab name.

**Response 12d).**

Not applicable.

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**Question 13:**

13. Regarding the Marginal Direct O&M Costs for 2022 actual recorded O&M expense for the first four components (1) customer service (2) customer accounts, (3) meters and regulators, (4) service lines.

- a) Please indicate where within the LRMCS can this cost be found, file name, tab name, cell, and column number.

**Response 13a).**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP.

Ch 9 \_SCG 2024TCAP LRMC Customer Costs

(1) customer service – tab: cust 8 o&m, row 14; Customer Service & Information Costs - tab: cust 8 o&m, cell J63

(2) customer accounts - tab: cust 8 o&m, row 21

(3) meters and regulators,- tab: cust 8 o&m, row 30

(4) service lines. – total cell D38

Ch 10 \_SDGE 2024TCAP LRMC OM Loader

(1) customer service, (2) customer accounts, (3) meters and regulators, (4) service lines are in tab: Output, rows: 19-33

- b) If not included in the LRMCS, please update the model to reflect the 2022 recorded data.

**Response 13b).**

The 2022 recorded data is not readily available.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

**(A.22-09-015)**

**DATA REQUEST DR PAO-SCG & SDG&E-002-MPS FROM CAL ADVOCATES**

**DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 14:**

14. What customer costs are shared between core and non-core customers.

All customer costs: (1) customer service (2) customer accounts, (3) meters and regulators, (4) service lines are shared between core and non-core customers.

a) If not, please explain in detail and break down the customer cost for core and non-core customers.

**Response 14a).**

Not applicable.

b) Please indicate where these customer costs can be found within the LRMCS.

Please include the file name and tab name.

**Response 14b).**

See Response 13a.

c) Please update these costs with 2022 actual recorded data.

**Response 14c).**

The 2022 recorded data is not readily available.

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**(A.22-09-015)**

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**DATED MAY 11, 2023**

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**Question 15**

15. Please explain how SCG calculated the cost of New Business in \$/ft and the replacement cost in \$/ft for the service line and service line replacement cost.

**Response 15.**

The cost of New Business in \$/ft and the replacement cost in \$/ft for the service line and service line replacement cost are based on historical projects with direct costs during 2019-2021, along with the labor / non-labor split for each size and for those where data was not available the 2017 data was escalated to 2021 dollars. Then, the overheads were applied.

- a. Include file name, tab name, cell, and column number where the cost calculation is illustrated within the LRMCS.

**Response 15a).**

See Excel file, CalAdvocates-002\_Q15a\_2021\_Service\_prices.xls

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**DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 16**

16. Please explain in detail the higher transmission and storage costs. What is causing the increase for 2024?

**Response 16.**

SoCalGas and SDG&E object to this question on the ground it is vague and ambiguous,. No relative year is stated to explain the increase. Subject to and without waiving the foregoing, Applicants respond as follows in sections a) and b).

- a) Please provide the file name, tab name, where within the electronic workpapers these calculations of the costs can be found.

**Response 16a).**

SoCalGas and SDG&E object to this question on the ground it is vague and ambiguous. No relative year is stated to explain the increase. Subject to and without waiving the foregoing, SoCalGas and SDG&E respond as follows. Please see Response 16b Excel workpapers for 2020 TCAP and 2024 TCAP comparisons.

- b) Please provide the costs on the 2020 TCAP side by side comparison with this 2024 CAP in a Microsoft excel spreadsheet including calculations, formulas and all data sources.

**Response 16b).**

SoCalGas and SDG&E object to this question on the ground it is vague and ambiguous. What particular costs is this question referring to. Subject to and without waiving the foregoing, SoCalGas and SDG&E respond as follows.

2020 TCAP - Please see Chapter 8 Excel workpapers prepared by Sim-Cheng Fung on July 2018. See tab "BTS rate" for Table 1. Total Transmisison Costs. And see tab "Table Storage Cost" for Embedded Storage Cost. Refer to Excel file, CalAdvocates-002\_Q16b\_Fung2020TCAP\_Emb\_Final.

2024 CAP- Please see Chapter 8 Excel workpapers prepared by Frank Seres September 30, 2022. See tab "T &S Cost & Reallocation" for Table 19 Total Transmission Costs. And see tab "Table 22 Storage cost" for Embedded Storage Cost. Refer to Excel file, CalAdvocates-002\_Q16b\_Seres2024TCAP\_Emb\_Final.

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**Question 17**

17. Regarding page 7, line 5-9, please provide a Microsoft excel spreadsheet including with a comparison side by side of the following:

- a) Actual annual demand by class schedule for (2020-2022)

**Response 17a).**

Please see Excel file, CalAdvocate-02\_Q17.

- b) Forecasted demand filed within the last TCAP (2020-2022)

**Response 17b).**

See Response 17a.

- c) Forecasted demand filed within this CAP (2024-2027)

**Response 17c).**

See Response 17a.

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**DATED MAY 11, 2023**

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**Question 18:**

18. Please explain in detail what is the life span for a service line for a single-family home?

**Response 18.**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP.

For SoCalGas, the life span for a service line for a single-family home is 67 years. This is shown in Ch 9\_SCG 2024TCAP LRMC Customer Costs, tab: 2021 RECC, cell: F32

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**DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 19**

19. Please explain in detail what is the life span for a meter or a regulator?

**Response 19.**

Please refer to Excel files sent on May 11, 2023, per DR-A2209015-PAO-SCG-SDGE-WP.

For SoCalGas, a meter has a 25 years life span. Ch 9\_SCG 2024TCAP LRMC Customer Costs, tab: 2021 RECC, cell: F33

For SoCalGas, a regulator has 33 years life span. Ch 9\_SCG 2024TCAP LRMC Customer Costs, tab: 2021 RECC, cell: F35

The life span data source is the GRC. <Microsoft Word - SCG-36-R Ngai Revised Direct Testimony FINAL (socialgas.com), which is based on a depreciation study.>

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**Question 20**

20. If SCG and SDG&E are not able to provide the requested information to all the questions above, state the reason(s) in the response.

**Response 20.**

See responses above.