

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 SET 1 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 1.1

1-1. Has SoCalGas/SDG&E ever considered permitting non-residential NGV transportation on noncore schedules?

a) If yes, please provide a detailed explanation of what these considerations entailed, the outcome of these considerations, and the rationale supporting that outcome.

Response 1.1 a).

Yes, SoCalGas/SDG&E evaluated a Clean Energy request/proposal to allow G-NGV customers the option of selecting qualifying noncore schedules during a prior Triennial Cost Allocation Proceeding (A.15-07-014). As noted in the Rebuttal Testimony of Jason Bonnett (April 11, 2016):

Clean Energy proposes to allow “NGV refueling station customers with monthly usage of 20,800 therms or more to choose to receive service under the non-core rate schedule.” SoCalGas and SDG&E oppose Clean Energy’s proposal for several reasons.

First, assuming every newly-eligible NGV customer elected noncore service, the uncompressed NGV rate for those customers who were not large enough to elect noncore service would increase substantially, from \$0.07694 per therm to around \$0.24612 per therm. This 220% increase in rates would negatively impact smaller NGV customers. This rate impact would occur because there would be a smaller pool of throughput to recover costs allocated to the NGV rate. Such a large rate increase would run contrary to the rationale behind the creation of a Sempra-wide NGV rate, which was originally proposed to promote development of additional NGV refueling stations, large and small, in both the SoCalGas and SDG&E service territory.

Second, Clean Energy cites the class average rates (which is the total throughput divided by the total revenue requirement including customer charge revenue) for the NGV and noncore Commercial Industrial Distribution (NCCI-D) customers, and uses those rates as justification for the perceived benefits of switching. However, these are not the actual volumetric rates charged to customers, but rather illustrative rates designed to show the general trend in rate impacts. For example, SoCalGas NCCI-D rates have four tiers based on usage with the tier 1 rate being \$0.13006 per therm and the tier 2 rate being \$0.08013 per therm, both of which are higher than the proposed NGV uncompressed rate of \$0.07694. Additionally, the NCCI-D class has a much higher monthly customer charge (\$350) than the NGV class (\$13 or \$65). Thus, it is unclear how much savings, if any, a NGV refueling customer would experience by switching to a noncore rate.

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Finally, the Prepared Rebuttal Testimony of S. Nasim Ahmed addresses the apparent primary concern of Clean Energy—i.e., that the NGV rate is being impacted by weather driven under-collections of other core customers. Assuming Mr. Ahmed’s proposal to create an NGV subaccount in the Core Fixed Cost Account is adopted, the NGV rate should see less usage related volatility. This solution should address the concerns of Clean Energy without negatively impacting smaller NGV customers that are not able to make the switch to elect noncore service.

In D.16-10-004, the Commission declined to accept Clean Energy’s proposal and approved the G-NGV rates and methodology proposed by SoCalGas.

b) If no, please provide a detailed explanation supporting the rationale for limiting non-residential NGV transportation to a core schedule.

Response 1-1 b).

See Response Question 1-1 a).

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Question 1-2

1-2. In Chapter 5, witness We Bin Guo states: "Noncore retail customers typically represent those with much larger individual loads than are characteristic of core customers. Also, noncore customers are generally business establishments with many employees."

Please describe the average individual load and other relevant characteristics that distinguish noncore customers from core customers, including the range of the number of employees that constitutes "many employees" as used in this testimony.

Response 1-2

As stated in page 1 of SoCalGas's Rule No. 23:

(https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-RULES_23.pdf)

"Noncore Service includes: (1) commercial and industrial usage electing noncore service, (2) electric generation, EOR, and refinery usage less than 20,800 therms per active month* electing noncore service, and (3) all usage ineligible for core service, including (a) refinery and EOR usage of 20,800 therms or greater per active month* and (b) all electric generation usage from generators greater than 1 megawatt (MW) system rated generating capacity, based on net continuous power output with usage of 20,800 therms or greater per active month*."

As stated in page 1 of SDG&E "SCHEDULE GTNC":

(https://tariff.sdge.com/tm2/pdf/tariffs/GAS_GAS-SCHEDS_GTNC.pdf)

Noncore, excluding cogeneration and UEG, where the average monthly use equals or exceeds 20,800 therms through a single meter and the customer has elected the noncore service classification. Customers with average monthly usage below 20,800 therms who receive service on this schedule may retain their noncore eligibility

The statement in Chapter 5 and in this question intends to explain that noncore customers, in general, have more natural gas load and employees than core customers. However, SoCalGas and SDG&E do not have data for the employee numbers of noncore customers.

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Question 1-3

1-3. During what month for the years 2016-2022 did each of the core class, noncore class, and Schedule G-NGV load exhibit their peak loads?

Response 1-3

PROTECTED MATERIALS: PROVIDED PURSUANT TO NON-DISCLOSURE

AGREEMENT IN A.22-09-015

The following excel file with confidential information and are being provided pursuant to the non-disclosure agreement executed on May 19, 2023, between SoCalGas and Clean Energy in A.22-09-015:

- Excel file, "Protected_Material_Clean_Energy-01_Q3_Q4".

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Question 1-4

1-4. What was the peak daily usage for each year from 2016-2022 for each of the core class, noncore class, and Schedule G-NGV load?

Response 1-4

See Response 1-3.

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Question 1-5

1-5. What was the average daily usage for each year from 2016-2022 for each of the core class, noncore class, and Schedule G-NGV load?

Response 1-5

See Excel file, "Clean_Energy-01_Q5".

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Question 1-6

1-6. Schedule G-NGV confers on customers a curtailment priority 1 or 2A. For each alternative schedule available to non-residential NGV station customers, please respond to the following questions.

Response 1-6

There are no other alternative schedules available to non-residential NGV station customers. Per Schedule G-NGV, Special Condition 5, "All gas used for NGVs, with the exception of NGV home refueling, is required to be under Schedule No. G-NGV".

a) What are the forecast daily delivery volumes in an average temperature year to customers served under the schedule?

Response a):

NGV forecasts are presented in Chapter 3 Workpapers at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#).

b) Specify the number of curtailment events under the schedule recorded over the past fifteen (15) years.

Response b):

SoCalGas is not aware of curtailment events under the schedule G-NGV.

c) For each event identified in response to Question 1-2b, please specify the underlying reason for the curtailment (e.g., capacity constraint, supply shortage, planned maintenance, emergency).

Response c):

See Response 1-6b).

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1-7. For each of the calendar years 2016-2023, for each of SoCalGas and SDG&E, please provide for Schedule G-NGV:

a) The forecast Average Year Throughput;

Response a).

	Mdth SoCalGas	Mdth SDG&E	Source
2016	14,028	1,652	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	14,837	1,747	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	15,693	1,848	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	16,599	1,955	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	16,933	2,247	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	17,860	2,409	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	18,838	2,583	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	19,870	2,769	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

b) The forecast Cold Year Throughput

Response b).

	Mdth SoCalGas	Mdth SDG&E	Source
2016	14,028	1,652	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	14,837	1,747	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	15,693	1,848	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	16,599	1,955	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	16,933	2,247	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	17,860	2,409	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	18,838	2,583	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
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c) The forecast Cold Year Peak Month Throughput;

Response c).

	Mdth	Mdth	Source
	SoCalGas	SDG&E	
2016	1,159	143	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	1,226	152	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	1,297	160	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	1,372	170	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	1,394	183	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	1,471	196	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	1,551	210	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	1,636	225	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

d) Actual throughput; and

Response d).

See Chapter 3 Workpaper NGV-1, Table 1, for historic SoCalGas G-NGV volumes from 2016 through 2021. The 2022 historic SoCalGas G-NGV volumes were 17,257 Mdth. The 2023 actual SoCalGas G-NGV volumes will not be available until early 2024.

e) The explanation for any differences between forecast and actual throughput (e.g., standard forecasting error, weather, etc.)

Response e).

Cost allocation forecasts for SoCalGas and SDG&E use historical volume growth rates to produce a forecast and will deviate from actual volumes if historic conditions are not repeated. Changes in historic conditions can occur through unforeseen changes in customer responses to regulation, market conditions, natural gas commodity costs, and other factors.

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Question 1-8

1-8. For each of the calendar years 2016-2023, for each of SoCalGas and SDG&E, please provide for residential core class:

a) The forecast Average Year Throughput;

Response a).

	Mdth	Mdth	Source
	SoCalGas	SDG&E	
2016	245,911	31,777	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	244,825	31,912	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	243,608	32,014	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	242,115	32,069	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	238,159	31,721	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	234,857	31,394	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	230,889	30,856	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	225,445	30,622	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

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b) The forecast Cold Year Throughput

Response b).

	Mdth	Mdth	
	SoCalGas	SDG&E	Source
2016	270,532	35,097	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	269,689	35,283	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	268,736	35,435	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	267,515	35,542	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	261,905	34,759	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	258,692	34,418	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	254,739	33,845	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	249,183	33,607	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

c) The forecast Cold Year Peak Month Throughput;

Response c).

	Mdth	Mdth	
	SoCalGas	SDG&E	Source
2016	40,477	5,099	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	40,407	5,133	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	40,264	5,155	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	40,081	5,171	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	39,817	5,080	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	39,328	5,030	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	38,727	4,946	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	37,883	4,912	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

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d) Actual throughput; and

Response d).

Please see Excel files,

- Clean_Energy-01_SCG_Q8e_Q9e
- Clean_Energy-01_SDG&E_Q8e_Q9e.

The data are contained in the tab marked "residential" for each files.

e) The explanation for any differences between forecast and actual throughput (e.g., standard forecasting error, weather, etc.)

Response e).

Please refer to Response 1-8d). The explanation is listed in the table.

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Question 1-9

1-9. For each of the calendar years 2016-2023, for each of SoCalGas and SDG&E, please provide for commercial and industrial core class:

a) The forecast Average Year Throughput;

Response a).

	Mdth SoCalGas	Mdth SDG&E	Source
2016	104,132	18,645	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	103,342	18,468	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	102,434	18,290	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	101,179	18,040	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	101,330	19,595	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	99,418	19,500	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	97,064	19,338	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	93,919	19,148	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

b) The forecast Cold Year Throughput

Response b).

	Mdth SoCalGas	Mdth SDG&E	Source
2016	109,187	19,362	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	108,366	19,178	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	107,423	18,994	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	106,120	18,734	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	105,527	20,441	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	103,615	20,346	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	101,260	20,183	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	98,108	19,992	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

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c) The forecast Cold Year Peak Month Throughput;

Response c).

	Mdth	Mdth	
	SoCalGas	SDG&E	Source
2016	12,051	2,081	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2017	11,965	2,061	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2018	11,866	2,041	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2019	11,733	2,013	A.15-07-014 - SoCalGas and SDG&E Triennial Cost Allocation Proceeding Phase 2
2020	11,989	2,346	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2021	11,779	2,336	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2022	11,521	2,318	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)
2023	11,174	2,296	A.18-07-024 - SoCalGas and SDG&E 2020 Triennial Cost Allocation Proceeding (TCAP)

d) Actual throughput; and

Response (d).

Refer to Response 1-8d). See C&I tab.

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Question 1-10

1-10. In Chapter 13, witness Sharim Chaudhury states: A compression surcharge or compression rate adder is intended to cover the cost of providing compressed natural gas (CNG) to motor vehicles fueling at public access CNG vehicle refueling stations owned and operated by Applicants.

- a) Please specify the total number of private CNG fueling stations that SoCalGas owns and operates.

Response a).

SoCalGas currently owns and operates eleven (11) private CNG fueling stations.

- b) Please specify the total number of public-access CNG fueling stations that SoCalGas owns and operates

Response b).

SoCalGas currently owns and operates sixteen (16) public-access CNG fueling stations.

- c) Please specify the total number of private CNG fueling stations that SDG&E owns and operates.

Response c).

SDG&E currently owns and operates three (3) private CNG fueling stations.

- d) Please specify the total number of public-access CNG fueling stations that SDG&E owns and operates

Response d).

SDG&E currently owns and operates two (2) public-access CNG fueling stations.

- e) How do SoCalGas and SDG&E recover the costs for fueling utility-owned fleet private, utility-owned refueling stations?

Response e).

Costs for fueling private, utility-owned refueling stations are considered general utility operating costs and are recovered from all ratepayers.

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- f) Do SoCalGas and SDG&E utilize public-access stations to service utility owned NGV fleets?

Response f).

Yes. The majority of the public-access stations provide CNG to both the general public and the utility fleet located at the base in question.

- g) How do SoCalGas and SDG&E distinguish between the costs to service utility owned NGVs and the costs to provide service to the general public?

Response g).

See Response 1-12.

- h) Do SoCalGas and SDG&E track the customer-to-fleet ratio for each of their respective public-access stations?

Response h).

SoCalGas and SDG&E are unable to respond to this question since it is unclear how "customer-to-fleet ratio" is being defined.

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Question 1-11

1-11. For each of SoCalGas and SDG&E's public-access fueling stations, please provide an accounting of the total costs and revenues resulting from compression services tariff operations.

Response 1-11

SoCalGas and SDG&E do not use the compression services tariff at any utility CNG stations.

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Question 1-12

1-12. Please provide a detailed description of the methodology used to develop the proposed compression rate adder.

Response 1-12

SoCalGas employed a third-party consultant, Energy and Environmental Economics, Inc. (E3), “to determine the cost of providing compression services for natural gas vehicles (NGVs) at filling stations owned by the Southern California Gas Company”. Further, “The methodology implemented by E3 is designed to allocate costs so that private NGV compression customers do not subsidize the public NGV compression users and vice versa.” (E3, “Southern California Gas NGV Compression Rate Adder Calculation for the 2024 TCAP”, Final Report, April 7, 2022, page 1).

Costs used to develop the G-NGV compression surcharge include capital costs, operations and maintenance costs (labor and non-labor) and electricity expenses.

With respect to the methodology used to develop the G-NGV compression surcharge, E3 states “To value the additional cost of providing this public compressed natural gas fuel for NGVs at each of the Company’s stations, E3 applied the following methodology:

1. Allocate capital costs of public-only and private-only use stations to public and private respectively.
2. Allocate capital costs of joint use stations based on capital costs of public and private single-use stations, as well as public and private throughput of joint use stations.
3. Allocate the O&M and electricity costs to public, private, and joint uses based on station usage as determined by throughput volumes.” (E3, “Southern California Gas NGV Compression Rate Adder Calculation for the 2024 TCAP”, Final Report, April 7, 2022, page 2).

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Question 1-13

1-13. Please describe the mechanism for tracking and recovering over- and under-collections resulting from the compression rate adder.

Response 1-13

This following mechanism is applicable for both SoCalGas and SDG&E. The authorized cost for the compression rate adder is balanced in the NGV Class Subaccount of each utility's Core Fixed Cost Account (CFCA). The rate for the compression rate adder is included in the overall NGV rate charged to customers under Schedule No. G-NGV, Natural Gas Service for Motor Vehicles. Revenues generated from Schedule No. G-NGV are balanced in the NGV Class Subaccount of the CFCA. The subsequent year's overall NGV rate is adjusted for any over- or under-collections in the NGV Class Subaccount.

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Question 1-14

1-14. The workpapers to the prepared written testimony of Sharim Chaudhury contain NGV Compression Rate Adder Models for SoCalGas and SDG&E.

- a) Please specify how Mr. Chaudhury derived the figures utilized in the models, including whether the models utilize historic or forecast rate base and throughput figures.

Response a).

Historic rate base for 2021 was used. The throughput was a forecast of the average 2024 to 2027 volume.

- b) If forecasts are used, please provide the same Compression Rate Adder Models utilizing historic figures for each of the years 2016-2023 for both SoCalGas and SDG&E.

Response b).

This information is not available.

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Question 1-15

1-15. For each of the years 2016-2023, please provide the following:

- a) Please specify all categories of costs (e.g., G&A, storage, local transmission, and distribution) allocated to the Sempra-wide uncompressed transmission charge rate under Schedule G-NGV and specify the cost allocation factor for each cost category. Please provide the total costs for each category and specify portion of the costs in each category arising from the prior year's undercollection based on forecast revenue and include a breakdown by customer rate class.

Response a).

The Sempra-wide costs are a combination of b) and c) below.

- b) Please specify all categories of costs (e.g., G&A, storage, local transmission, and distribution) allocated to the SDG&E uncompressed transmission charge under Schedule G-NGV, prior to the Sempra-wide rate calculation, and specify the cost allocation factor for each cost category. Please provide the total costs for each category and specify the portion of the costs in each category arising from the prior year's under-collection based on forecast revenue and include a breakdown by customer rate class.

Response b).

See Excel file, Clean_Energy-01_Q15b. This is the response to GRC 2024 Data Request Clean Energy -SCG -001. The under-collection costs are highlighted.

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- c) Please specify all categories of costs (e.g., G&A, storage, local transmission, distribution) allocated to the SoCalGas uncompressed transmission charge under Schedule G-NGV, prior to the Sempra-wide rate calculation, and specify the cost allocation factor for each cost category. Please provide the total costs for each category and specify the portion of the costs in each category arising from the prior year's undercollection based on forecast revenue and include a breakdown by customer rate class.

Response c).

See Excel file, Clean_Energy-01_Q15c. This is the response to GRC 2024 Data Request Clean Energy -SCG -001. The under-collection costs are highlighted.

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Question 1-16

1-16. Please provide a detailed explanation of the methodology used to determine proposed uncompressed NGV rates.

Response 1-16

- 1) Allocate the costs to NGV for SoCalGas/SDG&E, as shown in Response 1-15 b and c.
- 2) Calculate the costs to NGV for SoCalGas/SDG&E: NGV Revenues less Compression costs less Adders (CSITMA, CARB and GHG)
- 3) Combine the SoCalGas and SDG&E NGV revenue without Franchise Fees and Uncollectible (FF&U) less customer charge revenue.
- 4) Combine the SoCalGas and SDG&E NGV Volumes
- 5) Divide total SoCalGas and SDG&E NGV revenue by total SoCalGas and SDG&E NGV Volumes to calculate Sempra-wide NGV rate.
- 6) Multiply Sempra-wide NGV rate by SoCalGas FF&U to calculate SoCalGas NGV rate.
- 7) Multiply Sempra-wide NGV rate by SDG&E FF&U to calculate SDG&E NGV rate.
- 8) Add to SoCalGas NGV rate the Adders (CSITMA, CARB and GHG) and to SDG&E NGV rate the Adders (CSITMA, CARB and GHG)

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Question 1-17

1-17. In Chapter 3, on pages 9 and 13 respectively, witness Payan indicates that SoCalGas's NGV throughput is expected to increase and SDG&E's NGV throughput is expected to decrease. Please explain the basis for these expectations.

Response 1-17

For SoCalGas's NGV forecast, refer to page 345 of the SoCalGas Triennial Cost Allocation Proceeding (TCAP) Chapter 3 workpapers for NGV. As shown on page 345, the NGV growth expectation is based on the four-year historical average. The four-year historical meter growth is 2.3% and the four-year historical load growth is 1.3%.

For SDG&E's NGV forecast, refer to page 411 of the SDG&E's TCAP Chapter 3 workpapers for NGV. SDG&E forecasted load by utilizing the estimated load per meter and multiplying by the number of meters. The reason for the decline in load comes from a reduced number of customer meters and the loss of one of SDG&E's own utility meters.

As stated in the 2022 California Gas Report (page 132), in the SoCalGas service territory "The NGV market is expected to continue to grow, albeit at a slower rate than in the past. State regulations encourage the adoption of zero emission alternative fuels. Growth will continue for the next several years until zero emission alternative fuels become cost competitive with gasoline and diesel. NGV growth is also supported by the increased use and availability of RNG that provides significant GHG emission reduction and cost reduction benefits."

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Question 1-18

1-18. Please provide a detailed explanation of the methodology used to determine the forecasts for SoCalGas presented in Workpapers NGV-1, NGV-2, and NGV-3. Workpaper NGV-1 used historical billing records to provide actual G-NGV volumes (compressed, uncompressed) for 2021 and earlier years. Workpaper NGV-2 used historical billing records to provide actual G-NGV meter counts (compressed, uncompressed) for 2021 and earlier years. These volumes and meter counts were adjusted in future years using growth factors listed in Workpaper NGV-3 (Table 1 and Table 2).

Response 1-18

Workpaper NGV-3 used historical volumes (compressed, uncompressed) and meter counts shown in Workpaper NGV-1 and Workpaper NGV-2 to develop multi-year growth rates. Negative growth rate changes in out years (2026-2029) were assumed for uncompressed meter counts (meters count not assumed to track volume) and compressed volumes (station capacity and utilization limits). Compressed volume growth was based on anticipated fleet vehicle acquisition projects (Table 2).

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Question 1-19

1-19. In SoCalGas's 2017 Cost Allocation Proceeding (A. 15-07-014), SoCalGas established two subaccounts within the Core Fixed Cost Account (CFCA): one subaccount records the cost and revenue activity related to the NGV customer class and the other subaccount records the cost and revenue activity related to all other core classes. Please state the primary purpose of establishing these subaccounts

Response 1-19

According to Decision 16-10-004, Clean Energy proposed to shield NGV rates from amortization of weather-related under- or over-collections in the CFCA. The Applicants responded in rebuttal testimony that it may be possible to create a subaccount in the CFCA at each utility to record the cost and revenue activity related to the NGV customer class. A separate subaccount in the CFCA would record the cost and revenue activity related to all other Core classes. The approved Settlement Agreement provided that SoCalGas and SDG&E will establish two subaccounts in the CFCA as described above.

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Question 1-20

1-20. For each of the calendar years 2010-2023, please provide a breakdown of total annual costs and revenues booked to the each of the CFCA subaccounts as of December 31. For each year, indicate the total under or over-collection as of December 31 and an explanation of factors that caused the under or over-collection.

Response 1-20

See Excel file, Clean_Energy-01_Q20.

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Question 1-21

1-21. For each of the calendar years 2010-2023, please provide a breakdown of total annual costs and revenues booked to the each of the Noncore Fixed Cost Account as of December 31. For each year, indicate the total under or over-collection as of December 31 and an explanation of factors that caused the under or over-collection.

Response 1-21

Applicant is interpreting the question to be asking for a breakdown by subaccount within the Noncore Fixed Cost Account. See Excel file, Clean_Energy-01_Q21. SoCalGas is unable to provide the data for 2010 and 2011 as the data is not electronically stored and available. SoCalGas will update the excel file for the 2 years once the hardcopy schedules are available from offsite storage.