

**SAFETY POLICY DIVISION DATA REQUEST SPD-DR 006  
SDG&E/SOCALGAS 2021 RAMP REPORTS- A.21-05-011/014**

**DATE RECEIVED: JULY 9, 2021  
DATE RESPONDED: JULY 23, 2021**

**Please provide responses within a single document in both Word and PDF formats, as well as any tables in a modifiable Excel format.**

**Question 01:**

Table 4 below is confusing and presents challenges in interpreting. Specifically, in Forecast Dollars, Capital is presented as a three-year total and O&M is presented for 2024 only.

1a. Why is Capital cost presented for a three-year term, and O&M is presented only for 2024?

1b. Please confirm that the figure provided for Capital is per year cost and not a three-year total.

1c. Please provide one or more new tables to present the data in Table 4 more clearly and to provide consistent budget year durations (i.e., provide a table with consistent budget periods for apples-to-apples comparison). Please include a forecast per year budget total and a total spanning 2020 thru 2024. *Please provide a total sum line at the bottom of any new table.*

**Table 4: SoCalGas Risk Control and Mitigation Plan - Recorded and Forecast Dollars Summary<sup>25</sup>  
(Direct After Allocations, In 2020 \$000)**

ID	Control/Mitigation Name	Recorded Dollars		Forecast Dollars			
		2020 Capital	2020 O&M	2022-2024 Capital (Low)	2022-2024 Capital (High)	TY 2024 O&M (Low)	TY 2024 O&M (High)
C1	Perimeter Defenses	\$8,037	\$1,032	\$10,445	\$13,347	\$1,251	\$1,599
C2	Internal Defenses	\$4,658	\$3,124	\$10,816	\$13,821	\$3,158	\$4,035
C3	Sensitive Data Protection	\$0	\$2,377	\$7,054	\$9,014	\$2,351	\$3,004
C4	OT Cybersecurity	\$127	\$896	\$14,790	\$18,898	\$1,066	\$1,362
C5	Obsolete IT Infrastructure and Asset Replacement	\$206	\$1,083	\$8,928	\$11,408	\$1,297	\$1,657

**SDG&E and SoCalGas Response 01:**

**Response 1a:**

The capital and O&M forecasts in the RAMP Report and RAMP workpapers are presented in a format that aligns with how those forecasts will be presented in the companies' respective GRC Applications, i.e., data for five individual historic years and for three individual forecast years is shown in the RAMP and GRC workpapers for both O&M and capital while only the test year O&M value and the sum of the forecast years for capital is included in the RAMP Report and the GRC Application.

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**SDG&E and SoCalGas Response 01: Continued**

In the GRC, SDG&E and SoCalGas request funding for capital and O&M differently. O&M is requested only for the test year, which is 2024 in SoCalGas's and SDG&E's upcoming GRC. Capital projects, however, are presented for years 2022-2024, and the CPUC evaluates whether those projects are just and reasonable in those years. Accordingly, for RAMP, SoCalGas and SDG&E mirrored how they present cost forecasts in the GRCs, which is three-years (2022-2024 in this case) for capital and the test year for O&M.

**Response 1b:**

The amount reflected for Capital in the RAMP Report is the sum for the three years 2022, 2023, and 2024. The cost workpapers provide the annual cost estimates.

**Response 1c:**

Annual low and high forecast dollar ranges for Capital and O&M for years 2022 – 2024 are provided on page 4 of the Risk Assessment and Mitigation Phase (Chapter SCG/SDG&E-Risk-6-WP) Cybersecurity Workpapers dated May 17, 2021 and can be accessed via the links below.

SoCalGas: [https://www.socalgas.com/sites/default/files/SCG-Risk-6\\_Cybersecurity\\_WP\\_PDF\\_A.pdf](https://www.socalgas.com/sites/default/files/SCG-Risk-6_Cybersecurity_WP_PDF_A.pdf)

SDG&E: [https://www.sdge.com/sites/default/files/regulatory/SDG%26E-Risk-6\\_Cybersecurity\\_WP\\_PDF\\_A.pdf](https://www.sdge.com/sites/default/files/regulatory/SDG%26E-Risk-6_Cybersecurity_WP_PDF_A.pdf)

For convenience, SoCalGas and SDG&E are separately attaching their respective Cybersecurity cost and unit workpapers in Excel format.

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**Question 02:**

For the tables *APPENDIX C-1 SDG&E RSE RANKING* and *APPENDIX C-1 SOCALGAS RSE RANKING* please provide for each a reordered table that groups measures by risk chapter, and a new column to tally sum totals by chapter.

**SDG&E and SoCalGas Response 02:**

The companies provide the separately attached excel version of Appendix C-1 to SPD to provide the requestor the ability to perform desired reordering and summations in an efficient and timely manner.