

TURN DATA REQUEST

TURN-DR-001

SDG&E/SOCALGAS 2021 RAMP REPORTS – A.21-05-011/014

SDG&E/SOCALGAS COMPANIES RESPONSE

DATE RECEIVED: JUNE 24, 2021

DATE RESPONDED: JULY 9, 2021

Question 01:

On page SCG/SDG&E-RAMP-E-16, the Sempra Utilities state that, in these RAMP Reports, the companies use 2020 as the baseline for their pre-mitigation risk calculations for purposes of calculating RSEs. TURN's position is that the Settlement adopted in D.18-12-014 requires taking into account any risk reduction benefits that are expected prior to the GRC period under review, which in this case is 2024-2027, and that therefore all expected benefits prior to the beginning of 2024 should be taken into account in the RAMP analysis. Thus, TURN's position is that the Sempra Utilities were required to use the end of 2023 as the "baseline" for their RAMP analysis. For the limited purpose of responding to the following questions, please assume that, when using an end-of-2023 baseline, the Sempra Utilities would have the choice of calculating RSEs for either: (a) mitigation costs and risk reduction benefits for the period 2024-2027, or (b) mitigation costs and risk reduction benefits for just the 2024 test year.

- a. In response to a data request in these cases, would the Sempra Utilities be able to calculate alternative RSEs and associated supporting information required by the Settlement using the end of 2023 as the baseline for the determination of RSEs? If not, why not?
- b. In their GRC filing for the 2024 test year GRC, would the Sempra Utilities be able to calculate alternative RSEs and associated supporting information required by the Settlement using the end of 2023 as the baseline for the determination of RSEs? If not, why not?
- c. Please explain whether the answers to "a" and "b" are categorical and apply to all RSEs or whether the answers would depend on how many RSEs were requested to be calculated using an end of 2023 baseline. If the latter, please explain how the Sempra Utilities would determine which or how many alternative RSEs it would be able to calculate.
- d. If the answers to the previous questions indicate that the Sempra Utilities would be able to calculate alternative RSEs using an end-of-2023 baseline for at least some mitigations, would it be the position of the Sempra Utilities that:
 - i. They will not provide such alternative RSEs in response to a data request in these cases unless directed to do so by a CPUC order or ruling? Please explain the answer and the reasons for it.
 - ii. They will not provide such alternative RSEs in their test year 2024 GRC submission unless directed to do so by a CPUC order or ruling? Please explain the answer and the reasons for it.

Response 01.a:

SoCalGas and SDG&E object to this request to the extent it calls for speculation and requests information that is not within their knowledge and possession. Subject to and notwithstanding these objections, SoCalGas and SDG&E respond as follows:

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Response 01.a: -Continued

As stated in the RAMP Report in Chapter SoCalGas/SDG&E RAMP-E, “selecting a baseline is not defined or mentioned in the Settlement Agreement, nor is the selection of a ‘correct’ baseline prescribed by the Settlement Agreement.” (SCG/SDG&E-RAMP-E-19.)¹ Nevertheless, SoCalGas and SDG&E are open to performing modeling runs for TURN, including calculating alternative RSEs with a baseline as of the end of 2023, if TURN provides the applicable model inputs (e.g., assumptions, parameters) and explains the processes for doing so. To date, TURN has not responded to requests to explain its proposed process. As stated in the RAMP Reports, SoCalGas and SDG&E have calculated an RSE for all controls and mitigations where meaningful data or SME opinion exists to calculate the RSE or included an explanation why no RSE can be provided, in accordance with California Public Utilities Commission (CPUC or Commission) Safety Policy Division (SPD) staff guidance. SoCalGas and SDG&E cannot commit to performing model runs for information they do not have.

Response 01.b:

SoCalGas and SDG&E object to this request to the extent it calls for speculation, requests information that is not within their knowledge and possession, and/or to the extent it is unintelligible. Subject to and notwithstanding these objections, SoCalGas and SDG&E respond as follows:

SoCalGas and SDG&E have not solidified their requests at this time for inclusion in the Test Year 2024 GRC. And, as noted above in response to Question 1.a, TURN has not responded to requests to explain its proposed process, to date. Accordingly, SoCalGas and SDG&E do not have the requisite information in their possession to respond to Question 1.b.

Response 01.c:

SoCalGas and SDG&E object to this request to the extent it calls for speculation, requests information that is not within their knowledge and possession, and/or to the extent it is unintelligible. Subject to and notwithstanding these objections, SoCalGas and SDG&E respond as follows:

¹ Additional details regarding the companies’ position on the baseline issue are provided in: Section III.B in each company’s RAMP Chapter SCG/SDG&E-RAMP-E, the companies’ joint reply to protests to their respective RAMP Applications, and comments filed June 29, 2021 in the S-MAP proceeding.

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Response 01.c: -Continued

As explained in Response 1.a above, TURN has not responded to requests to explain its proposed process, to date. Accordingly, SoCalGas and SDG&E do not have the requisite information in their possession to respond to Question 1.c.

SoCalGas and SDG&E envision that any future agreement to perform additional model runs (e.g., alternative RSE analysis) would apply to only those mitigations for which an RSE was provided in their RAMP Reports (i.e., subject to the parameters set forth in Response 1.a). SoCalGas and SDG&E cannot commit to performing model runs for information they do not have.

Response 01.d:

SoCalGas and SDG&E object to this request to the extent it calls for speculation, requests information that is not within their knowledge and possession, and/or to the extent it is unintelligible. Subject to and notwithstanding these objections, SoCalGas and SDG&E respond as follows:

See Response 1.a above. SoCalGas and SDG&E suggest taking a collaborative approach with TURN to run the additional model runs (i.e., alternative RSE scenarios) using TURN's inputs in this RAMP proceeding through subsequent discovery. Consistent with Response 1.b above, it is premature to consider running scenarios for the Test Year 2024 GRC.