



# ORA

*Office of Ratepayer Advocates  
California Public Utilities Commission*

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<http://ora.ca.gov>

## **ORA DATA REQUEST No. ORA-A1701013-SCG005 CPUC Docket A.17-01-013, et al**

**Date:** August 3, 2017

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**Re: Data Request No. ORA-A1701013-SCG005  
Response requested: August 31, 2017**

### **INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. Provide your responses as they become available, but no later than the due date noted above. If you are unable to provide a response by this date, notify ORA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each Data Request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this Data Request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the Data Requests should be

Bates-numbered, and indexed if voluminous. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

As to any Data Request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate Data Request.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

### **DEFINITIONS**

- A. As used herein, the term “you,” “your(s),” “SoCalGas” mean Southern California Gas Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- D. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- E. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- F. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- G. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

## **DATA REQUEST**

### **Analysis Used to Calculate Levelized Cost of Energy (LCOE)**

1. Please state the basis for the baseline and short, medium and long term targets for the Levelized Cost of Energy measured in \$/Therm plan for the following sectors:
  - a. Portfolio
  - b. Single Family Residential
  - c. Multi-family Residential
  - d. Commercial
  - e. Agricultural
  - f. Industrial
2. Describe the analysis you did to determine the short, medium and long term targets for the Levelized Cost of a Therm? Please provide all documents and workpapers showing the analysis performed in the development of appropriate targets for Levelized Cost of Energy for the following sectors:
  - a. Portfolio
  - b. Single Family Residential
  - c. Multi-family Residential
  - d. Commercial
  - e. Agricultural
  - f. Industrial

### **Historical Data on Levelized Cost of Energy (LCOE)**

For the following requests, please use Table 1 provided below. You will need to fill in a separate copy of Table 1 for each of the requests below. Please re- label appropriately.

3. Please provide the levelized cost of energy in \$/Term you are using as a baseline and for the three years prior to the baseline. Please provide this information for each of the following sectors:
  - a. Portfolio
  - b. Single Family Residential
  - c. Multi-family Residential
  - d. Commercial
  - e. Agricultural
  - f. Industrial
4. For each of the sectors listed below, identify the five largest sub-programs (by total budget) operating in the sector. For each of these sub-programs, provide the levelized cost of energy in \$/Term used in calculating the sector baseline and annually for the three years leading up to the baseline year. Use Table 1 for this purpose.
  - a. Single Family Residential
  - b. Multi-family Residential
  - c. Commercial
  - d. Agricultural
  - e. Industrial

**Table 1: Levelized Cost of Energy for Baseline and Three Prior Years**

	Baseline to be Used in final business plan filing	One Year Before Baseline Year	Two Year Before Baseline Year	Three Years Before Baseline Year
Levelized Cost of a Therm (PAC, including Admin Costs)				
Levelized Cost of a Therm (PAC, excluding Admin Costs)				
Levelized Cost of a Therm (TRC including Admin Costs)				

**Analysis Used to Calculate Annual Lifecycle Savings**

5. Please use Table 2 to provide the annual lifecycles savings projections (Therms) embedded in your cost-effectiveness showing for any year available from 2018-2025 for the following sectors (If you did not provide CE data for any year, write “No CE Showing” in the appropriate cell.):
  - a. Portfolio
  - b. Single Family Residential
  - c. Multi-family Residential
  - d. Commercial
  - e. Agricultural
  - f. Industrial

**Table 2: Life-cycle savings projections**

	2018	2019	2020	2021	2022	2023	2024	2025
Lifecycle savings (Therms)								

6. Please state the basis for your lifecycle savings projections.
7. Please describe the analysis you did to determine lifecycle savings targets. Please provide all documents and workpapers showing the analysis performed in the development of appropriate lifecycle savings targets.

8. Please use Table 3 to provide the annual lifecycles savings (Therms) for the years 2013 to 2017 (year to date) for each of the following sectors.S (You will need to fill in a separate copy of Table 3 for each of the requests below. Please re- label appropriately.)
- g. Portfolio
  - h. Single Family Residential
  - i. Multi-family Residential
  - j. Commercial
  - k. Agricultural
  - l. Industrial

**Table 3: Life-cycle savings historical**

	2014	2015	2016	2017
Lifecycle savings (Therms)				

**END OF DATA REQUEST**