ORA DATA REQUEST
ORA-SDG&E-DR-017-SWC
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 8, 2014
DATE RESPONDED: DECEMBER 19, 2014

Exhibit Reference: SDG&E-16

Subject: Fleet Services

Please provide the following:

1. In response to ORA Deficiency Data Request, SDG&E-ORA-012-SWC, A(1) and A(5) provide the average price for different categories of vehicles. Please explain why the forecasted average prices of the vehicles are different in the two responses.

SDG&E Response:

The response to ORA Deficiency Data Request SDG&E-ORA-012-SWC A(1) was in reference to the "Fleet Amortization" for the "Current Fleet", that is, all vehicles currently under lease and not part of the forecasted years. These are the vehicles that were leased prior to the forecasted years and the average prices that were requested were calculated from the original purchase prices.

As provided in the response to ORA Deficiency Data Request SDG&E-ORA-012-SWC A(5), the prices used to forecast 2014 to 2016 amortization are based on the most recent purchase prices of the same vehicle type escalated to the appropriate forecast year. Therefore, there is no correlation to the average prices in response A(1) and A(5).

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2. In response to ORA Deficiency Data Request, SDG&E-ORA-012-SWC, question A.4., SDG&E provided a table for the type of vehicle, unit cost, number of units per vehicle for replacement and incremental and Diesel Particulate Filters Retrofit/Replacement units and costs for 2014 to 2016. Provide the same breakdown of vehicle purchases for recorded 2009 to 2013.

SDG&E Response:

	2009	2010	2011	2012	2013	Average Price
Automobiles	8	1	11	16	11	32,657
Compact Trucks and Vans	63	20	74	20	16	23,174
Light Duty Trucks and Vans	78	23	115	86	178	34,201
Medium Duty Trucks and Vans	21	2	2	45	87	100,446
Heavy Duty Trucks and Vans	6	1		4	16	419,575
Trailers	5	3	18	11		50,429
Construction Equipment		5	4		5	96,062
Total	**181**	**55**	**224**	**182**	**313**	**55,026**

Note that the table above represents when vehicles were put into service. Due to vehicles being refinanced in 2009, using lease dates would yield skewed results. This represents a very close approximation of the correct count and average prices.

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3. In Exhibit SDG&E-16-WP, page 11, SDG&E provides the Amortization, Fleet Replacements, and Incremental Fleet for Business Needs for 2014 to 2016.
    a. SDG&E forecasts "New Fleet Units for Replacements" of 270 vehicles in 2014. Provide the recorded number of New Fleet Units for Replacements for year-to-date 2014 and broken down by type of fleet vehicle (i.e., similar to response to ORA Deficiency Data Request SDG&E-ORA-012-SWC, question A.4.).
    b. SDG&E forecasts "Incremental Fleet for Business Needs" of 41 vehicles in 2014. Provide the recorded number of Incremental Fleet Units for Business Needs for year-to-date 2014 and broken down by type of fleet vehicle (i.e., similar to response to ORA Deficiency Data Request SDG&E-ORA-012-SWC, question A.4.) and identify the specific SDG&E Organization that requested the vehicle.
    c. SDG&E forecasts "Diesel Particle Filter Retrofits/Replacements" of 68 retrofits in 2014. Provide the recorded number of Diesel Particle Filter Retrofits/Replacements for year-to-date 2014.

SDG&E Response:

3a.

	2014	Average Price
Automobiles	7	27,237
Compact Trucks and Vans	9	24,058
Light Duty Trucks and Vans	95	32,281
Medium Duty Trucks and Vans	55	80,679
Heavy Duty Trucks and Vans	38	359,447
Trailers	1	34,382
Construction Equipment		
Grand Total	205	105,388

3b. No Incremental Fleet Units for Business Needs have been purchased in 2014. Due to reprioritization of funds in 2014, we have deferred purchase of some vehicles to 2015.

3c. In November of 2014, the California Air Resources Board issued the Regulatory Advisory MSCD 14-18 granting an extension of these particular Diesel Particulate Filter Retrofits/Replacements that previously required replacement before the end of 2014. None of these retrofits have been completed in 2014.

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4. In Exhibit SDG&E-16, page CLH-8, Table CLH-4, SDG&E provides the number of vehicles in its fleet as of Year-end 2013. Provide the same information as contained in Table CLH-4 for 2009 to year-to-date 2014.

SDG&E Response:

VEHICLE TYPES	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**
Automobiles	172	145	107	106	105	106
Compact Trucks and Vans	631	542	508	482	453	406
Light Duty Trucks and Vans	548	523	593	609	717	711
Medium Duty Trucks and Vans	348	331	321	322	371	349
Heavy Duty Trucks and Vans	241	229	221	220	234	226
Subtotal over-the-road (OTR)	**1,940**	**1,770**	**1,750**	**1,739**	**1,880**	**1,798**
Trailers	241	237	227	235	241	251
Construction Equipment	74	65	98	97	101	101
Subtotal non-over-the-road (Non-OTR)	**315**	**302**	**325**	**332**	**342**	**352**
TOTAL	**2,255**	**2,072**	**2,075**	**2,071**	**2,222**	**2,150**

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5. In Exhibit SDG&E-16, page CLH-2, lines 8 to 13, SDG&E states, "EPAct requirements regarding the federally mandated procurement of alternative-fueled vehicles. As an Alternative Fuel Provider Fleet, 90% of the SDG&E's annual light duty vehicle purchases are required under the EPAct to be approved alternative-fueled vehicles. To achieve the 90% annual requirement, SDG&E plans to buy alternative fueled vehicles at a premium. If SDG&E cannot achieve the 90% annual requirement, SDG&E may purchase EPAct credits."
    a. How many light duty vehicle were purchased during each year of 2009 to year-to-date 2014? Of those light duty vehicle purchases, how many were Alternative-Fueled vehicles?
    b. Provide the average cost of a light duty vehicle and the average cost of an Alternative-fueled light duty vehicle.
    c. For each category of vehicle in SDG&E's fleet, provide the total number of units and the total number of units that are Alternative-fuel vehicles in each category as of year-to-date 2014.

SDG&E Response:

5a. For purposes of EPAct, light duty vehicles are classified as vehicles 8,500-pound gross vehicle weight or less. This definition encompasses most of the vehicles in SDG&E's classifications of Automobiles, Compact Trucks and Vans, and Light Duty Trucks and Vans, but there are some in those categories that exceed the weight limit definition used for EPAct reporting purposes. The table below represents the number of light duty vehicles and alternative-fuel vehicles reported for EPAct for years 2009 to 2014. SDG&E has met its EPAct compliance through a combination of Alternative-Fuel Vehicle purchases, biodiesel fuel credits, and purchases of EPAct AFV Credits.

Year	2009	2010	2011	2012	2013	2014
LD Vehicles Purchased	114	69	140	60	146	N/A
AFVs Acquired	5	8	5	5	3	N/A

2014 reporting for EPAct has not been completed yet.

5b. Average costs for each class of vehicle were provided in questions 2. and 3. above. However, each vehicle type represents many different configurations of vehicles with unique pricing for each vehicle. Generically comparing light duty vehicles to alternative-fuel light duty vehicles with SDG&E's fleet would not yield a meaningful comparison. To illustrate a more meaningful comparison, an example of the same vehicle (which SDG&E has in its Fleet) with conventional fuel vs. alternative fuel is below:

Response to Question 5b (Continued)

Vehicle	Starting MSRP
2015 Honda Civic Sedan (No EPAct Credit)	$18,490
2015 Honda Civic Sedan Hybrid (½ EPAct Credit)	$24,735
2015 Honda Civic Natural Gas (1 EPAct Credit)	$26,740

5c.

VEHICLE TYPES	YTD 2014	Alternative-Fuel Vehicles
Automobiles	106	98
Compact Trucks and Vans	406	0
Light Duty Trucks and Vans	711	10
TOTAL	**1,223**	**108**

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6. In Exhibit SDG&E-16, page CLH-3, lines 20 to 22, SDG&E states, "Included in the Vehicle Servicing & Repair section of this testimony are costs for retrofitting the SDG&E fleet of over-the-road vehicles with backup cameras and backup sensors to try to help prevent the number of backup incidents."
    a. How many over-the-road vehicles require backup cameras and backup sensors?
    b. How much does it cost to retrofit a vehicle with the backup cameras?
    c. How much does it cost to retrofit a vehicle with the backup sensors?
    d. Provide the number of over-the-road vehicles that have been retrofitted with backup cameras and backup sensors.
    e. Does any of the new over-the-road vehicles that will be purchased during 2014 to 2016 already have backup cameras and backup sensors built in? How was this considered in the forecasts for the backup cameras and the backup sensors?

SDG&E Response:

6a. There are 1,713 over-the-road vehicles without backup cameras and 674 over-the-road without back sensors.

6b. Approximately $600 per vehicle.

6c. Approximately $600 per vehicle.

6d. All 674 backup sensor installations have been completed in 2014. SDG&E is currently in the process of awarding the contract for backup cameras.

6e. SDG&E does not design, spec, nor purchase vehicles with backup cameras or sensors except on a limited number of light duty vehicles which come standard. A premium of $900 for backup cameras and sensors was added to each forecasted vehicle to account for the incremental costs of hardware and installation, which would be amortized over the life of the lease.

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7. In Exhibit SDG&E-16, page CLH-9, lines 11 to 16, SDG&E states, "Vehicle servicing and repair activities are carried out in 11 garage locations disbursed throughout SDG&E's service territory. Primary cost drivers include costs to replace three units to comply with the Portable Diesel Engines Airborne Toxic Control Measures ("ATCM"), one full-time employee ("FTE") to support SDG&E's compliance with San Diego City fire code requirements for qualified operators of mobile fueling operations, and one full-time employee to support technician training."
    a. Provide the average number of FTEs employed in the vehicle Servicing and Repairs during 2009 to year-to-date 2014.
    b. Is San Diego City fire code requirements for qualified operators of mobile fueling operations a new requirement?
    c. When did the new San Diego City fire code requirements for qualified operators of mobile fueling operations take affect
    d. How many FTEs does SDG&E have to address San Diego fire code requirements for qualified operations of mobile fueling operations during 2009 to year-to-date 2014?
    e. How many FTEs does SDG&E have to provide technician training during 2009 to year-to-date 2014?

SDG&E Response:

7a.

	2009	2010	2011	2012	2013	2014
FTEs	82	83	82	80	83	80

7b. SDG&E received final confirmation of the complete California Fire Code permit requirements from the City of San Diego in February 2013 with the final version of our program accepted in October of 2013. The City of San Diego's approval of the program included that we had dedicated trained and qualified mobile tanker fueling operators at all four of our operating locations within the City of San Diego. This required FTEs to ensure coverage at our 4 operating districts with the City of San Diego.

7c. October, 2013.

7d. Four.

7e. From 2009 to 2013, SDG&E had 2 FTEs to provide technician training. As stated on page 37 in SDG&E-16-WP, a trainer retired in 2013 leaving one. The remaining trainer has retired in 2014 leaving currently none.

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8. In Exhibit SDG&E-16WP, page 37, SDG&E states, "Newer vehicles need a higher level of technical training and expertise to maintain compliance with emission reduction targets and operating safely." Explain how newer vehicles need a higher level of technical training and expertise with emission reduction targets and operating safely compared to technical training and expertise for vehicles purchased in 2013.

SDG&E Response:

With each generation of vehicles comes additional technology to maintain increasing emission control standards. While there isn't any significant difference in training requirements between vehicles purchased in 2013 and 2014, Exhibit SDG&E-16-WP is specifically referring to the need to replace one trainer who retired in 2013 after the FTE forecasts were completed.