1. In the Union of Concerned Scientists (UCS) opening testimony at page 41, lines 8-11, UCS states in its discussion of the number of MD-HD vehicles in SDG&E’s territory that “It is possible that the data SDG&E relied on was the “[m]onthly new registration data” that IHS offers on its website. The number of new registrations in SDG&E’s territory in 2016 would be much smaller than the number [of] total vehicle populations in SDG&E territory during that 1 year.”
2. Is UCS correct that SDG&E’s vehicle population figures are incorrectly based on “new registrations” rather than the total number of registrations in SDG&E’s territory? Please explain and provide all supporting sources, workpapers, and calculations.

SDG&E’s figures are not based on new registrations. SDG&E's figures were based on IHS/Polk data for commercial fleet vehicles (model year 2000 or newer). This data does not include, for example, Class 2b trucks that are operated for commercial use, possibly by a small business, but not considered to be part of a commercial fleet.

As stated in SDG&E's Response to Question 5 of TURN Data Request 1 (Responded on 2/13/2018), SDG&E is not in a position to share the underlying source data from IHS/Polk because SDG&E’s license for the IHS/Polk data has expired. However, SDG&E was allowed to retain information derived from the source data, which is provided in the table below.

|  |  |  |
| --- | --- | --- |
| Class |  |  |
| 1 | 49096 |  |
| 2 | 68068 |  |
| 3 | 6837 |  |
| 4 | 4825 |  |
| 5 | 4168 |  |
| 6 | 5176 |  |
| 7 | 2899 |  |
| 8 | 11142 |  |
| TOTAL | 152211 |  |

1. If UCS is correct that SDG&E relied on incorrect data, please provide the total number of MD-HD vehicle registrations in SDG&E’s territory from IHS/Polk or another source. Please provide all sources and workpapers.

See Response 1.a. above.