**DATA REQUEST**

1. This question is a follow-up to SDG&E’s response to SEIA’s third data request, Question 1. SDG&E’s response to Question 1d-e indicated the following load-related and total transmission investments. We also show the transmission additions listed in FERC Form 1 for SDG&E for the same years.

****

a. Please explain why the SDG&E’s total transmission capital investments provided in response to SEIA003-Q1de do not agree with FERC Form 1 transmission investments. For example, SDG&E’s Form 1 for 2017 indicates $477 million in transmission plant additions, whereas the response to SEIA003-Q1de indicates $194 million in such capital additions.

SDG&E Response:

1. The transmission capital investments provided in response to SEIA data request #3, questions 1c and 1d, are a subset of the transmission investments shown in FERC Form 1. Further, the “Total Cost” shown in the above table are the total costs for only those transmission projects which were judged to have some component that was driven by the forecast growth in peak demand. The estimated component driven by the forecast growth in peak demand is shown in the column labeled “Load Related.”

Finally, “FERC Form 1 Transmission Additions” for a given year reflect the total costs, cumulated from the inception to completion, of all transmission projects that are placed in-service during that year, as well as any trailing costs for transmission projects placed in service in earlier years. In contrast, the transmission capital investments provided in response to SEIA data request #3, questions 1c and 1d reflect capital expenditures made during that year for then in-progress transmission projects, and only for those projects having some peak load-growth driven component. The differences between (i) the transmission costs included in annual FERC Form 1 filings, and (ii) the annual transmission expenditures provided in response to SEIA data request #3, questions 1c and 1d, mean that the costs reported in FERC Form 1 for any given year can be significantly greater than, or significantly less than, the costs provided in the response to SEIA data request #3.

b. We note that the data provided in SEIA003-Q1de implies that 67% of SDG&E’s 2012-2017 transmission investments were load driven investments. See above table. On the other hand, SDG&E’s transmission demand study indicated that 30.6% of Period 1 (2012-2017) transmission costs are load- or peak-related.

SDG&E Response:

1. See SDG&E’s response to question 1a.

Finally, we note that SDG&E’s load-driven transmission costs in 2012-2017 appear to be about 22% of total transmission additions reported in Form 1, which is closer to the demand charge study result (but still not the same). Please explain why SDG&E’s response to SEIA003-Q1de appears to indicate a much larger percentage for load driven costs, expressed as a percentage of total transmission additions, than was reported in the SDG&E transmission demand charge study.

SDG&E Response:

 The data provided in the above table indicates that “Transmission Additions” from FERC Form 1 for the period 2012-2017 were $3,753,818,000. SDG&E’s response to SEIA data request #3, questions 1c and 1d indicates that SDG&E’s peak load driven transmission expenditures for the period 2012 through 2017 were estimated to be $834,092,000. (Sum of cells E68, F68, G68, H68, I68 and J68 on the worksheet labeled “XMSN\_with\_Ld-Driven\_share” in the embedded Excel file named “Load-Driven\_Transmission\_2010-2024.xlsx”.) The ratio of $834,092,000 to $3,753,818,000 is 22% as indicated in the question.

 SDG&E’s transmission demand charge study reported peak load driven transmission expenditures for the period 2012-2017 at $901,740,000. (Sum of column P on the worksheet labeled “2012\_2017 Accounting” in the Excel file named “Copy of Transmission Demand Charge WP\_SDGE Website”.) The ratio of $901,740,000 to $3,753,818,000 is 24%. Accordingly, the data reported in SDG&E’s response to SEIA data request #3, questions 1c and 1d produces a slightly smaller percentage than the data reported in SDG&E’s transmission demand charge study (22% vs. 24%).

 In reviewing the data provided in SDG&E’s transmission demand charge study, it was determined that the transmission expenditures for the transmission project with budget code # 13132 were inadvertently duplicated. Removing the $82,976,000 in duplicate costs reduces the total peak-load driven transmission expenditures from $901,740,000 to $818,764,000. The ratio of $818,764,000 to $3,753,818,000 is 22%, the same percentage calculated using the data provided in SDG&E’s response to SEIA data request #3, questions 1c and 1d.

c. Why were SDG&E transmission additions in Form 1 in 2010-2011 less than SDG&E’s reported costs that were provided in SDG&E’s response to SEIA003-Q1de?

SDG&E Response:

1. See response to question 1a.

d. Please provide the portion of SDG&E’s transmission investments in 2012 (or in other years close to 2012) that represent the investment in the Sunrise project. Provide this information both for FERC Form 1 reported costs and for the costs reported in SDG&E’s response to SEIA003-Q1de.

SDG&E Response:

 SDG&E objects to this request to the extent it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding.

 Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Annual Sunrise Powerlink expenditures, including the component judged to be load driven, in the year 2012 are shown in SDG&E’s response to SEIA data request #3, questions 1c and 1d. Specifically, see cell E10 on the worksheet labeled “XMSN\_with\_Ld-Driven\_share” in the embedded Excel file named “Load-Driven\_Transmission\_2010-2024.xlsx”.

Sunrise Powerlink costs reported in SDG&E’s 2012 FERC Form 1 filing are approximately $1,641,000,000.