STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

**DATA REQUEST**

Date: November 30, 2017

To: Southern California Edison (U# 338) Pacific Gas & Electric Co. (U#39)

San Diego Gas &Electric Co. (U#902) Bear Valley Electric Service (U #913) PacifiCorp (U#901)

Liberty Utilities (CalPeco Electric) LLC (U#933)

From: Jonathan Frost David Lee, P.E.

Regulatory Analyst, Energy Division Utilities Engineer, Energy Division

California Public Utilities Commission California Public Utilities Commission jf6@cpuc.ca.gov dkl@cpuc.ca.gov

COPIES TO:

|  |  |
| --- | --- |
| Southern California Edison (U# 338)Tristan.ReyesClose@sce.comTony.Mathis@sce.com | Bear Valley Electric Service (U #913)Nguyen.Quan@gswater.comfredyanney@gmail.com |
| Pacific Gas & Electric Co. (U#39)AASO@pge.com (Andrea Miller)AXNZ@pge.com (Aichi Daniel) | PacifiCorp (U#901)Cathie.Allen@pacificorp.comCynthia.Mifsud@pacificorp.com |
| San Diego Gas &Electric Co. (U#902)John PachecoJPachecho@semprautilities.comKathryn ValdiviaKValdivia@semprautilities.com | Liberty Utilities (CalPeco Electric) LLC(U#933) Dan.Marsh@libertyutilities.comPeter.Eichler@libertyutilities.com |
| Ed Randolph, Energy DivisionEdward.Randolph@cpuc.ca.gov | Christa Salo, Communications DivisionChrista.Salo@cpuc.ca.gov |
| David Peck, Executive DivisionDavid.Peck@cpuc.ca.gov | Iryna Kwasny, Legal DivisionIryna.Kwasny@cpuc.ca.gov |
| Robert Pocta, ORARobert.Pocta@cpuc.ca.gov | Merideth Sterkel, Energy Divisionmts@cpuc.ca.gov |
| Gabriel Petlin, Energy DivisionGabriel.Petlin@cpuc.ca.gov | Michael Morris, Communications DivisionMichael.Morris@cpuc.ca.gov |
| Martin Kurtovich, Safety and Enforcement DivisionMatin.Kurtovich@cpuc.ca.gov | Glenn Semow, Communications DivisionGlenn.Semow@cpuc.ca.gov |
| Alexander Abramson, Communications DivisionAlexander.Abramson@cpuc.ca.gov | Greg Wilson, ORAGreg.Wilson@cpuc.ca.gov |
| Junaid Rahman, Safety and Enforcement DivisionJunaid.Rahman@cpuc.ca.gov | Chloe Lukins, ORAChloe.Lukins@cpuc.ca.gov |
| Clayton Tang, ORAClayton.Tang@cpuc.ca.gov | David Lee, Energy DivisionDavid.Lee@cpuc.ca.gov |
| Jonathan Frost, Energy DivisionJonathan.Frost@cpuc.ca.gov |  |

**R.17-05-010 ELECTRIC IOUS DATA REQUEST**

As specified in § 5.2 of the OIR, the Commission requires the electric IOUs to file and serve data on their Rule 20A programs that will create a common baseline on the relevant issues identified in the OIR. To that end, the Commission requests that you provide the information requested below, no later than December 22, 2017. Unless specified otherwise, this data request refers to and requests information generated or created during the last 12 years. If you have any questions or concerns, please communicate them as soon as possible to Jonathan Frost.

**INSTRUCTIONS:**

1. Please provide all information in your possession, custody or control, or in the possession, custody and/or control of your affiliates or agents, that is responsive to these data requests.
2. Where applicable, please provide data in Microsoft Excel format in one single file with the same number of tabs and tables found in the sample spreadsheet. All data shall span from the time frame of 2005 to present, unless specified otherwise. If necessary for file size, individual tabs can become individual files – but keeping the workbook whole is preferred.
3. While the spreadsheet format is expected to capture the data requested below, please provide any additional documentation or spreadsheets to be responsive to all information requested in this document. Energy Division staff has attempted to organize the data tables in the spreadsheet in an organized fashion to optimize each table’s ability to be responsive to as many items below as possible. Please consult with Energy Division before modifying the tables (with the exception of adding rows for projects, cities, etc.). Unless agreed to with Energy Division staff, please add additional tables (as necessary) or provide other documents to ensure complete responses to questions rather than modifying the format of the pre-prepared tables.
4. Please Bates-stamp all supporting documents produced, identify the Bates-range of documents produced in response to each DR. Responses and documents may be produced and served electronically, but they should be machine-readable and searchable to the fullest extent possible.
5. If you have any questions about the meaning or scope of the data requests herein, please direct those questions to Jonathan Frost at your earliest opportunity.
6. Please identify the personnel (employees, consultants, agents, etc.) who provided information for each of the data requests below. As used in this context herein, “identify” means to provide the full name, business address, and title of each employee, consultant or agent who provided such information.
7. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.

*.*

**REQUESTED DATA:**

1. **Basic Details and Status of Projects**

*Eligible & Ineligible Communities*

* 1. [Addition based on feedback] Please describe your eligibility criteria and relevant authority for communities to participate in the Rule 20A program. Describe the reasons why communities could not be deemed as eligible or lose their eligibility.
	2. [Verbatim from OIR] A complete list of Rule 20A-eligible communities;
	3. [Addition based on feedback] A complete list of Rule 20A-ineligible communities
		+ Describe why they are ineligible
		+ Describe what percent of total communities and customers served are ineligible. In addition, describe the total number and percent of overhead and total meters that are in ineligible communities relative to system overhead and system total meters.

For a) – c), see the sample table in tab 3) (“Eligible and Ineligible Communities”) of the attached spreadsheet.

* 1. [Modified from OIR] The total cost of each completed project includes some ratepayer and non-ratepayer costs.  The utility may be aware of non-ratepayer costs.  Identify the types of non-ratepayer cost categories that are frequently incurred on a project (e.g. street lighting, repaving, sidewalk repair, undergrounding communication utilities, city department staff time, removal or replacement of other signage, hazardous material removal, CEQA, discovery of archeological materials, permit fees, direct payment by local government to electrical corporation for insufficient Rule 20A funds, etc.).  For at least 5-10 projects, attempt to identify the ratepayer and non-ratepayer costs (as known, and by category). If the utility can fill in additional information on non-ratepayer projects for more than 5-10 projects, please do so.

Please refer to sample table in the tab 1 labelled “Detailed Project Information” and *include additional columns (as or if needed) to breakdown non-ratepayer costs*. Please provide all data for all years dating back to 2005. For table definitions, please refer to Attachment B of this document for definitions.

* 1. [Addition based on feedback] The date that undergrounding districts were approved for each community.
	2. [Modified from OIR] The number of projects per community in the following categories:
		+ Undergrounding District has already formed since 2005
		+ Initiated for the next ten years since 2005 (process has started but no Utilities Conversion Plan);
		+ In planning/design phase with a Utilities Conversion Plan;
		+ In progress (construction) or incomplete (include projects that began any year prior to 2005 and were still in progress/incomplete);
		+ Completed over the past 12 calendar years (include projects that began any year prior to 2005 and were completed between 2005 & 2017).
	3. [Verbatim from OIR] The data should denote whether these projects are in urban, suburban or rural locations and if the project is located in a disadvantaged community.

A sample for e) – g) can be seen in tab 1 (”Detailed Project Information”) of the attached spreadsheet. Please provide all data for all years dating back to 2005. Note that the values for the bulleted items in f) (represented by fields I5 – M5) will be identical within the same community. For column definitions, please see Appendix B.

*Historical Data Since Program Inception*

* 1. [Addition based on feedback] Provide a complete list of all projects undertaken *since the inception of your Rule 20A program*. Please provide the name of the project, the dollar amount provided via Rule 20A (in Nominal dollars), the date paid, and which jurisdiction received the funding. Additionally, please provide the annual authorized amount in GRC, and for each community: the allocated amount (per allocation rule), budgeted amount (internally at IOU), and amount spent. Please refer to sample tables in the tab labelled “Historical Data Tables.”
1. **Cost and Credit Allocations**

Questions a) through d) are to be answered in the sample table format provided below d).

* 1. [Verbatim from OIR] The estimated cost of individual projects initiated and/or in progress by community;
	2. [Verbatim from OIR] The number of work credit allocations used for each project, including the number of mortgaged or borrowed credit allocations by community;
	3. [Verbatim from OIR] The number of projects completed or underway that relied on credits that were bought or traded, if any; the percentage of the project funding provided by those credits; the cost to acquire those credits (if known) by community.

For a) through c), please see the sample table on the tab labelled “Detailed Project Information.” Please provide all data for all years dating back to 2005. For column definitions, please see Appendix B.

* 1. [Modified from OIR] The utility’s total annual Rule 20A spending by community; and the dollar value of total projects in a community completed each year in Nominal terms.

Refer to the second table in the tab labelled “Historical Data Tables.” Please provide all data dating back to the inception of your Rule 20A program.

* 1. [Addition based on feedback] Describe how the costs were determined:  Was there an RFP issued to third parties?  Was it single sourced/non-competitive bid?  Were the costs determined solely by the IOU?  Is there market data documentation available to support reasonableness of the costs?
	2. [Addition based on feedback] Update the following example tables for Allocation and Borrowing Data for the years 2016 and 2017 for all communities.

See the tabs labelled “2016 Allocations and Borrowing” and “2017 Allocations and Borrowing.”

* 1. [Addition based on feedback] Please fill in the table Allocation Factor and Meter Totals in the second tab of the spreadsheet. Please provide all data for all years dating back to 2005.

*Soft Costs*

* 1. [Addition based on comments] Are Rule 20A program/project “soft costs” consistent with those incurred in routine capital projects funded exclusively by the business entities themselves?
	2. [Addition based on comments] At the workshop a rough "40% or more figure” of the total program/project's budget spent on Rule 20A soft costs was mentioned.  Is that accurate?
	3. [Addition based on comments] Whatever the percentage, what can be done to increase delivery efficiency in Rule 20A projects?

1. **Environmental, Human Health Impacts**
	1. [Modified from OIR] The CalEnviroScreen Score from version 3.0 of the locations with completed projects;
2. **Outreach and Education**
	1. [Verbatim from OIR] A general description of the utility’s Rule 20A-related outreach and education efforts plans, partnerships, staffing and resources. To the extent applicable, describe how and in what ways these strategies vary by region (including urban/suburban/rural and whether the project is in a disadvantaged community);
3. **Meters**
	1. [Modified from OIR] The number of line miles and overhead meters installed each year using new electric lines that were granted an exemption from the requirement to underground and
	2. [Modified from OIR] The number of line miles and meters installed using new electric lines that were not exempt from requirement to underground
4. **Non-Participating Communities**
	1. [Modified from OIR] A list of communities that have ***never***completed a Rule 20A project nor utilized Rule 20A work credit allocations for projects. Please include a brief explanation as to why.

See table in tab “Eligible & Ineligible Communities.

1. **Rule 20A Credit Trading**
	1. For every year since the inception of the Rule 20A program, list every credit trade/purchase that has occurred between communities. Please refer to the sample table on the tab labelled Trading History.
2. **Community Rule 20A Work Credits Redeemed, Overhead Line Miles Converted**
	1. List in the Communities that have redeemed Rule 20 A Credits and rank them from highest to lowest (with 1 being the highest) based on the total number of work credits they have redeemed *for all years you have records for combined*. Also, please provide the total number of overhead line miles that have been converted for each community. Please refer to the sample table on the tab labelled Credits Redeemed.
	2. Additionally, please provide a link to an online-based GIS map which showing a heat map with a color gradient for the number of credits redeemed and have a separates layer for the miles of converted lines, and whether or not a community is considered to be a disadvantaged community. All layers should be able to be displayed at the same time without appearing too busy or incomprehensible.
3. **Cost of Rule 20A Program for Residential Customers**
	1. For every year of the Rule 20A Program, please provide the estimated annual cost to the average residential customer and total gross annual costs for residential customers. Please refer to the sample table on the tab labelled Cost to Residential Customers.

**Appendix A**

**DEFINITIONS:**

As used herein:

“**Poles**” or “**Utility Poles**” means any wood, steel, concrete or other structure to which overhead electric or communications facilities are attached, including without limitation poles, towers, trees, buildings, and the like, but excluding customer premises that have service drops attached but are not used for further conveyance.

“**You**” “**your**” and/or “**responding utility**” means or refers to the above utility addressees responding to these requests, and all affiliates, agents, and/or employees of the utility addressee, as well as any entity acting on behalf of the utility addressees, or any of them.

“**Facilitie**s” means or refers to, without limitation, wires, conductors, antennas, guy wires, cables, and/or any other equipment used to facilitate the transmission of communications or energy.

“**Disadvantaged Communities**”refers to communities identified based on geographic, socioeconomic, public health, and environmental hazard criteria established in CalEnviroScreen 3.0.

“**Urban**”refersto densely settled areas that have at least 50,000 people.

“**Suburban**” refers to areas that have between 2,500 and 50,000 people.

“**Rural**”is represented by all population, housing, and territory not included within an urban or suburban area.

“**Real Terms**” refers to the dollar value for a given year adjusted for inflation.

“**Soft Costs**” mean any costs that are expense items that are not direct costs to the conversion of the overhead facilities and poles to underground.

“**Non-Ratepayer Costs**” refers to costs that are not covered by Rule 20A. These include street lighting, repaving, sidewalk repair, undergrounding communication facilities, removal or replacement of other signage, hazardous material removal, CEQA, discovery of archeological materials, permit fees, etc.

**Appendix B**

**DETAILED PROJECT INFORMATION DEFINITIONS**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Cell Number** | **Field** | **Description** |
| Project Details |
| 1 | C5 | Project Name | Naming convention use for the project. |
| 2 | D5 | Unique Project Identifier  | (E.g. Work Order No.). |
| 3 | E5 | Undergrounding District Name |  |
| 4 | F5 | Location (Street, City, County) | Street location of the project, or the location boundary if more than one street. |
| 5 | G5 | Zip Code | If more than one, please use the predominant zip code |
| 6 | H5 | Reasons Why the Project was Qualified Under Rule 20A Criteria | See Footnote in Spreadsheet |
| 7 | I5 | Please Cite the Original Document(s) by Name in which Rule 20A Project Qualifications were Assessed for the Project |  |
| 8 | J5 | Is the Project Complete? |  |
| Number of Projects Per Community (Totals) |
| 9 | K5 | Number of projects with Undergrounding district that were formed | Fields I5 through M5 will see multiple repetitive values for the same community. |
| 10 | L5 | Number of projects initiated for the next ten years | Project has started but no utilities conversion plan. Fields I5 through M5 will see multiple repetitive values for the same community. |
| 11 | M5 | Number of Projects in planning phase with a Utilities Conversion Plan | Fields I5 through M5 will see multiple repetitive values for the same community. |
| 12 | N5 | Number of Projects in progress (construction) | Fields I5 through M5 will see multiple repetitive values for the same community. |
| 13 | O5 | Number of Projects Completed | Fields I5 through M5 will see multiple repetitive values for the same community. |
| 14 | P5 | Urban/ Suburban/ Rural |  |
| 15 | Q5 | Disadvantaged Community? |  |
| Project Timelines |
| 16 | R5 | Project Resolution Pass Date/Date of Undergrounding District Formation | Date the city or county passed resolution. |
| 17 | S5 | Project Design Start Date | The date the project enters the utility’s “active” project queue or date the utility began designing the project. |
| 18 | T5 | Project Construction Start Date | Date the utility began construction of the project. Date of initial shovel-to-dirt. |
| 19 | U5 | Project Construction End Date | Date in which service was restored after the last pole has removed from the project location. |
| 20 | V5 | Project Completed  | Yes/No, last pole removed? |
| 21 | W5 | Date Rule 20A Work Credits are Redeemed |  |
| 22 | X5 | Please Explain if Credits were Transferred Over Additional Days | Only applies to projects in which the work credits could not all be redeemed in a single calendar day. Otherwise describe as Not Applicable. |
| 23 | Y5 | Total Business Days ~~(S5-R5)~~ (V5-T5) | Total business days from shovel-to-dirt to restoration of service following removal of last pole |
| 24 | Z5 | If Project not completed, Expected Completion Date | Projected date to remove the last pole. |
| 25 | AA5 | Date Cancelled if Cancelled |  |
| Project Execution Details |
| 26 | AB5 | Number of Poles Removed | Number of poles removed by both electric and communication utilities. |
| 27 | AC5 | Number of meters converted to underground services | Numbers of electric meters served by overhead now is served by underground. |
| 28 | AD5 | Miles of Overhead Lines Converted to underground |  |
| 29 | AE5 | Project Trenched Footage | Physical length of space trenched |
| 30 | AF5 | Characterization of Project Area | What are the majority of the customers served in this area (residential, commercial, industrial, agricultural) |
| Who Performed the Work |
| 31 | AG5 | Were Contractors Hired for any Portion of Project Completion? |  |
| 32 | AH5 | % of Project Work Performed by Electric Utility (In-house) and Funded by Rule 20A Work Credits | Percentage of project work that is done by electric utility’s employees |
| 33 | AI5 | % of Project Work Performed by Contractors and Funded by Rule 20A Work Credits  | Percentage of project performed by contractors for an electric utility. |
| 34 | AJ5 | Total % Work Performed that was funded by Rule 20A Work Credits |  |
| Costs |
| 35 | AK5 | Estimated Cost of Projects Initiated/ in Progress |  |
| 36 | AL5 | Rule 20A Ratepayer Costs |  |
| 37 | AM5 | Non-Ratepayer Repaving Costs | If known. |
| 38 | AN5 | Non-Ratepayer Communications Infrastructure Costs | If known. |
| 39 | AO5 | Non-Ratepayer Street lighting Costs | If known. |
| 40 | AP5 | Non-Ratepayer City Department Staff Time Costs  | If known. |
| 41 | AQ5 | Direct Payment by Community to Utility for Insufficient Rule 20A funds | If known. |
| 42 | AR5 | Subsurface Transformers Costs funded by Rule 20A Work Credits (if any) |  |
| 43 | AS5 | Percent of Subsurface Transformers funded by Rule 20A Work Credits (N/A if none) |  |
| 44 | AT5 | Grid Hardening work funded by Rule 20A Work Credits (if any) |  |
| 45 | AU5 | Percent of Grid Hardening work funded by Rule 20A Work Credits (N/A if none) |  |
| 46 | AV5 | Total Non-Ratepayer Costs (sum of AK5 through AO5) | To the extent known by an electric utility. |
| 47 | AW5 | Total Cost of Completed Project AJ5 + AP5 (Equals AJ if no known Non-Ratepayer Costs) | Sum of electric utility, communication utility, and applicant costs known by an electric utility. |
| 48 | AX5 | Difference Between Total Cost and Estimated Cost (AO5-AP5) |  |
| 49 | AY5 | Identify and Quantify Factors that Contribute to Cost Variances |  |
| 50 | AZ5 | Adjustments to Previously Completed Projects | If any. N/A if none. |
| 51 | BA5 | Date of Adjustments | If any. N/A if none. |
| Work Credits |
| 52 | BB5 | Value of Work Credits (in USD) used for the Project |  |
| 53 | BC5 | All Eligible Work Credits Available to Community at the Time When Work Credits are Redeemed | Excluding Borrowing Forward and Purchasing from Other Communities. |
| 54 | BD5 | Value of Work Credits Borrowed Forward up to 5 Years |  |
| 55 | BE5 | Value of Work Credits Borrowed Forward Beyond 5 Years |  |
| 56 | BF5 | Please Cite by Name of Document(s) in Which Utility Gained CPUC Approval to Permit Communities to Borrow Forward Beyond 5 Years |  |
| 57 | BG5 | Did the Project (completed or underway) rely on purchased credits from other communities? |  |
| 58 | BH5 | Value of Credits Purchased from other communities |  |
| 59 | BI5 | Source of Purchased Work Credits |  |
| 60 | BJ5 | Percent of Ratepayer Project Funding from Credits Purchased from other Communities |  |
| 61 | BK5 | Cost of Acquiring Those Credits (e.g. $0.50 per each $1 of Credits |  |
| 62 | BL5 | Please Cite Document(s) by Name in Which Utility Granted Approval of Credit Purchasing Transaction Between Communities |  |
| 63 | BM5 | Delays Due to IOU and/or Third Party Contractor Design & Construction |  |
| Delays, Challenges to Completion |
| 64 | BN5 | Delays to Local Government Coordination Challenges |  |
| 65 | BO5 | Delays Due to Challenges with Communication Providers or Sewage Entities |  |
| 66 | BP5 | Delays Due to Unexpected Events |  |
| 67 | BQ5 | Delays Due to Insufficient Work Credits at Initiation or During the Project Lifecycle |  |
| 68 | BR5 | Delays Due to Other Causes |  |
| 69 | BS5 | Unknown Cause of Delays |  |
| 70 | BT5 | Additional Challenges to Project Completion (if Unfinished) and Experienced by Projects (if completed) | Design issues, share trench with communication utility, insufficient allocation, environmental issues, cultural issues, acquire easements, removing poles, accidents, cooperation by certain party, etc. |
| Environmental and Cultural Issues |
| 71 | BU5 |  Environmental Issues (e.g. contaminated soils) |  |
| 72 | BV5 |  Amount Paid for Remediation (if any) |  |
| 73 | BW5 | Amount of Rule 20A Credits Paid for Remediation (if any) |  |
| 74 | BX5 | Cultural Issues |  |
| 75 | BY5 | Amount Paid for Resolving Cultural Issues (if any) |  |
| 76 | BZ5 | Amount of Rule 20A Credits Paid for Resolving Cultural Issues (if any) |  |