

Company: Southern California Gas Company (U904G)  
Proceeding: 2016 General Rate Case  
Application: A.14-11-004  
Exhibit: SCG -210

**SoCalGas**

**REBUTTAL TESTIMONY OF SARA A. FRANKE  
(CUSTOMER SERVICES FIELD AND METER READING)**

June 2015

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**





**TABLE OF CONTENTS**

**I. SUMMARY OF DIFFERENCES ..... 1**

**II. INTRODUCTION..... 3**

**A. ORA..... 3**

**B. TURN ..... 4**

**C. UCAN..... 4**

**D. UWUA..... 5**

**III. REBUTTAL TO PARTIES’ O&M PROPOSALS – NON-SHARED COSTS..... 5**

**A. CSF Operations Cost Category ..... 5**

**1. ORA..... 6**

**a. TY 2016 Forecast – Order Volumes and Other Variables  
(Excluding Customer Growth) ..... 7**

**b. Adjustment to Account for Customer Growth ..... 24**

**c. Adjustment to Account for Increased Drive Time Due to  
Increased Traffic Congestion..... 27**

**d. New Services for Customers – Expanded Appliance Safety  
Checks, Enhanced Customer Education and Outreach  
Safety Checks..... 31**

**e. Refresher Training..... 36**

**f. Job Shadowing/Retiree Knowledge Transfer ..... 36**

**g. Operator Qualification Training ..... 39**

**h. New MSA Inspection Program ..... 41**

**i. Curb Meter Regulator Replacements..... 48**

**2. UCAN..... 48**

**3. UWUA..... 55**

**a. SoCalGas Response Times for A1 Gas Leak Orders..... 55**

**b. MSA Inspection Program..... 55**

**c. Training, Mentoring, Job Shadowing ..... 58**

**d. Other UWUA Proposals..... 60**

**B. CSF Supervision Cost Category ..... 61**

**1. ORA..... 62**

**2. Other Parties..... 67**

**C. CSF Dispatch Cost Category ..... 68**

**D. CSF Support Cost Category ..... 68**

**1. ORA..... 69**

a.	TY 2016 Forecast Methodology .....	69
b.	MSA Inspection Program.....	72
c.	Field Technician Training Improvements .....	74
d.	Commercial/Industrial Field Instructors .....	76
e.	Technology Specialist to Manage New Wireless Access for all Field MDTs .....	76
f.	New AT&T Wireless Network Access Fees for Field MDTs .....	76
2.	Other Parties.....	77
E.	Meter Reading Operations Cost Category .....	77
F.	Meter Reading Clerical Cost Category .....	77
G.	Meter Reading Supervision and Training Cost Category .....	77
H.	Meter Reading Support Cost Category .....	77
I.	Other .....	77
IV.	REBUTTAL TO PARTIES' O&M PROPOSALS – SHARED COSTS .....	78
A.	CSF Staff Cost Category .....	78
1.	ORA.....	78
a.	New Customer Services Staff Director Position.....	79
b.	Gas Diversion Investigation Program.....	80
2.	Other Parties .....	82
V.	REBUTTAL TO PARTIES' CAPITAL PROPOSALS .....	82
A.	Summary Comparison of the Parties' Capital Proposals .....	82
1.	ORA.....	82
2.	Other Parties .....	82
V.	CONCLUSION .....	82
Appendix A	.....	A-1
Appendix B	.....	B-1
Appendix C	.....	C-1

1                                   **SOCALGAS REBUTTAL TESTIMONY OF SARA A. FRANKE**  
2                                   **(CUSTOMER SERVICES FIELD AND METER READING)**

3 **I. SUMMARY OF DIFFERENCES**

4                   Table SAF-1 below summarizes the parties’ respective Test Year (“TY”) 2016 forecasts  
5 for SoCalGas Customer Services Field (“CSF”) and Meter Reading activities.

6                                   **TABLE SAF-1**  
7                                   **Summary of Differences<sup>1</sup>**

<b>TOTAL O&amp;M - Constant 2013 (\$000)</b>			
	<b>Base Year 2013</b>	<b>Test Year 2016</b>	<b>Change</b>
SOCALGAS	172,759	203,209	30,450
ORA	172,759	184,576 <sup>2</sup>	11,817

<b>TOTAL CAPITAL - Constant 2013 (\$000)</b>			
	<b>2014</b>	<b>2015</b>	<b>2016</b>
SOCALGAS	3,096	437	7,217
ORA	2,605	437	7,217

8                   Table SAF-2 below summarizes the parties’ respective TY 2016 O&M forecasts by CSF  
9 and Meter Reading cost category.

10

---

<sup>1</sup>ORA is the only party that submitted testimony containing TY 2016 forecast expenses for SoCalGas’ CSF and Meter Reading activities. TURN’s sole mention of CSF and Meter Reading in its testimony pertains to 2013 employee recognition expenses totaling \$2,179 dollars for sporting event tickets and \$1,399 dollars for clothing. Aside from suggesting that these two cost items be removed from SoCalGas’ TY 2016 forecast, TURN did not propose any changes to SoCalGas’ TY2016 forecast for CSF and Meter Reading activities. Therefore no cost forecast is shown for TURN. UCAN submitted testimony but did not raise any objections to or contest any aspects of SoCalGas’ TY 2016 forecast with the exception that UCAN recommends using a lower order volume for two of SoCalGas’ fifty CSF work order types. Because UCAN did not propose a corresponding dollar amount associated with its proposed order volume adjustment, no TY 2016 cost forecast is shown for UCAN. UWUA submitted testimony indicating it supports SoCalGas’ forecasts of TY 2016 expenses.

<sup>2</sup> The amount shown reflects a correction made to account for a \$25,000 error ORA made in its testimony for the CSF-Support cost category.

1  
2

**TABLE SAF-2**  
**Summary Comparison by Cost Category**

<b>TOTAL O&amp;M - Constant 2013 (\$000)</b>			
	<b>Base Year 2013</b>	<b>Test Year 2016</b>	<b>Change</b>
<b>NON-SHARED COSTS</b>			
<b>A. CSF – Operations<sup>3</sup></b>			
SoCalGas	105,908	127,945	22,037
ORA	105,908	112,720	6,812
<b>B. CSF – Supervision</b>			
SoCalGas	11,118	13,388	2,270
ORA	11,118	12,264	1,146
<b>C. CSF – Dispatch</b>			
SoCalGas	8,920	8,806	(114)
ORA	8,920	8,806	(114)
<b>D. CSF – Support</b>			
SoCalGas	9,758	12,623	2,865
ORA	9,758	11,008 <sup>4</sup>	1,250
<b>E. Meter Reading – Operations</b>			
SoCalGas	28,937	30,382	1,445
ORA	28,937	30,382	1,445
<b>F. Meter Reading – Clerical</b>			
SoCalGas	1,079	1,113	34
ORA	1,079	1,113	34
<b>G. Meter Reading – Supervision &amp; Training</b>			
SoCalGas	3,426	4,058	632
ORA	3,426	4,058	632
<b>H. Meter Reading – Support</b>			
SoCalGas	2,042	2,488	446
ORA	2,042	2,488	446
<b>SHARED COSTS</b>			
<b>CSF Staff</b>			
SoCalGas	1,571	2,406	835
ORA	1,571	1,737	166

3

<sup>3</sup> UCAN did not raise any objections to or contest any of SoCalGas’ TY 2016 forecasts with the exception that, with respect to the CSF Operations cost category, UCAN recommends that lower order volumes be adopted for two CSF seasonal work order types, i.e., “Seasonal Off” and “Seasonal On”. Because UCAN did not propose a specific corresponding dollar adjustment to SoCalGas’ TY 2016 forecast, no dollar amounts are shown for UCAN.

<sup>4</sup> Although ORA indicates in its testimony in several places (e.g., Ex. ORA-13, page 43, Table 13-22; page 65, Table 13-30) that it recommends TY 2016 funding of \$11.033 million, the total for the itemized amounts ORA proposes in its testimony for each cost element is \$11.008 million, as ORA correctly notes on page 69 (footnote 192) of its testimony.

1 **II. INTRODUCTION**

2 **A. ORA**

3 Office of Ratepayer Advocates (“ORA”) issued its report on CSF on April 24, 2015.<sup>5</sup>  
4 ORA proposes a TY 2016 funding level for CSF and Meter Reading that is \$11.817 million<sup>6</sup>  
5 higher than 2013 adjusted-recorded costs (an increase of 6.8%), whereas SoCalGas’ TY 2016  
6 forecast is \$30.45 million higher than 2013 adjusted-recorded costs (an increase of 17.6%).<sup>7</sup>  
7 Following is a summary of ORA’s proposals:

- 8 • ORA supports SoCalGas’ TY 2016 Meter Reading forecast totaling \$38.041 million  
9 for all four Meter Reading cost categories.
- 10 • ORA supports SoCalGas’ TY 2016 forecast for one of the five CSF cost categories,  
11 i.e., CSF Dispatch, or \$8.806 million.
- 12 • For the CSF Operations cost category, ORA proposes a TY 2016 funding level based  
13 on six-year average (2009-2014) annual historical costs, rather than on an order type-  
14 by-order type analysis of order volume patterns and factors impacting each individual  
15 work order type as SoCalGas proposes. In addition to six-year average costs, ORA  
16 recommends partial funding for a portion of SoCalGas’ incremental TY 2016 funding  
17 requests, resulting in a total CSF Operations forecast of \$112.720 million, or 12% less  
18 than SoCalGas’ forecast.
- 19 • For the CSF Supervision cost category, ORA proposes using a five-year average  
20 (2009-2013) forecast methodology, rather than accounting for forecasted work levels  
21 and maintaining the current employee-to-supervisor span of control, as both  
22 SoCalGas and SDG&E did.<sup>8</sup> ORA also objects to TY 2016 funding for incremental  
23 supervisors that will be needed to supervise Meter Set Assembly (“MSA”) inspection  
24 personnel required to conduct atmospheric corrosion inspections<sup>9</sup> post-Advanced  
25 Metering Infrastructure (“AMI”) implementation. ORA’s forecast, which is based  
26 solely on a five-year average (2009-2013), is \$12.264 million compared to SoCalGas’  
27 forecast of \$13.388 million.

---

<sup>5</sup> Exhibit (“Ex.”) ORA-13, Report on the Results of Operations for San Diego Gas & Electric Company and Southern California Gas Company, Test Year 2016 General Rate Case – Customer Services

<sup>6</sup> The amount shown reflects a correction made to account for a \$25,000 error ORA made in the CSF-Support cost category. See footnote 9 for the source of the error.

<sup>7</sup> As an observation, SoCalGas notes that ORA proposes incremental TY 2016 funding for SoCalGas that is approximately *one-third* of SoCalGas’ request. Similarly, ORA proposed a reduction in SDG&E’s TY 2016 costs that is approximately *three times* the amount proposed by SDG&E. Dividing/multiplying by three appears to be ORA’s primary objective with respect to the TY 2016 cost forecasts for both SoCalGas and SDG&E.

<sup>8</sup> ORA supports SDG&E’s TY 2016 forecast for the CSF Supervision cost category, which is based on the same forecasting methodology used by SoCalGas.

<sup>9</sup> The Department of Transportation Code of Federal Regulations (“CFR”) 192.481 requires that each MSA be inspected every three calendar years (and not to exceed 39 months) for atmospheric corrosion.

- 1 • For the CSF Support cost category, ORA uses 2013 adjusted-recorded costs rather  
2 than a five-year average as SoCalGas proposes, and includes only a portion of  
3 SoCalGas' incremental funding requests, resulting in a TY 2016 forecast of \$11.008<sup>10</sup>  
4 million compared to SoCalGas' forecast of \$12.623 million.
- 5 • For the CSF Staff cost category, ORA supports SoCalGas' use of a five-year average  
6 but objects to all of SoCalGas' incremental TY 2016 funding requests, resulting in an  
7 ORA TY 2016 forecast of \$1.737 million compared to SoCalGas' forecast of \$2.406  
8 million.
- 9 • ORA's IT witness supports SoCalGas' capital forecast for 2015 and 2016 but  
10 proposes using 2014 recorded capital costs for 2014, for SoCalGas CSF and Meter  
11 Reading.

## 12 **B. TURN**

13 The Utility Reform Network ("TURN") submitted testimony on May 15, 2015.<sup>11</sup>

14 Following is a summary of TURN's only proposal pertaining to SoCalGas' CSF and Meter  
15 Reading activities:

- 16 • 2013 costs totaling \$2,179 dollars for sporting tickets and \$1,399 dollars for clothing  
17 (both for employee recognition) are not necessary to provide utility service and  
18 should be removed from the TY 2016 forecast.<sup>12</sup>

## 19 **C. UCAN**

20 The Utility Consumers' Action Network ("UCAN") submitted testimony on May 15,  
21 2015.<sup>13</sup> Following is a summary of UCAN's sole proposal pertaining to SoCalGas' CSF and  
22 Meter Reading activities:

- 23 • SoCalGas' forecasts of CSF work order volumes for two order types ("Seasonal Off"  
24 and "Seasonal On") should be reduced to account for the historic decline in pilot  
25 relights.<sup>14</sup>

---

<sup>10</sup> Although ORA indicates in its testimony in several places (e.g., Ex. ORA-13, page 43, Table 13-22; page 65, Table 13-30) that it recommends TY 2016 funding of \$11.033 million, the total for the itemized amounts ORA proposes in its testimony for each cost element is \$11.008 million, as ORA correctly notes on page 69 (footnote 192) of its testimony.

<sup>11</sup> Ex. TURN-Marcus, "Report on Various Results of Operations Issues in Southern California Gas Company's and San Diego Gas and Electric Company's 2016 Test Year General Rate Cases"

<sup>12</sup> Ex. TURN-Marcus, pages 46-48.

<sup>13</sup> Ex. UCAN-Fulmer, "Testimony of Mark Fulmer on Behalf of the Utility Consumers' Action Network Concerning Sempra's Revenue Requirement Proposals for San Diego Gas and Electric and SoCalGas".

<sup>14</sup> As noted previously, UCAN does not provide a proposed dollar amount associated with its order volume forecast for the two noted order types.



1           **D.     UWUA**

2           The Utility Workers Union of America (“UWUA”), one of the two unions that represent  
3 CSF and Meter Reading employees at SoCalGas and that are parties to the joint collective  
4 bargaining agreement with SoCalGas, also submitted testimony on May 15, 2015.<sup>15</sup> The  
5 following is a summary of UWUA’s proposals:

- 6           • The Commission should adopt SoCalGas’ forecast of TY 2016 expenses.
- 7           • SoCalGas should establish 96 MSA inspector positions rather than the 84 positions  
8           SoCalGas projects will be needed to conduct ongoing DOT-required inspections as  
9           Meter Reading is eliminated.
- 10          • A working group, comprised of SoCalGas management, employees, public interest  
11          representatives and CPUC staff, should be established to monitor sufficiency of  
12          resources and compliance with DOT MSA inspection requirements. A review should  
13          be conducted after one-year. If the review identifies a need for additional funding,  
14          the incremental revenue should be obtained through an advice letter filing.
- 15          • Incremental funding above SoCalGas’ TY 2016 forecast should be authorized for  
16          Represented Employee Safety Officers (“RESO”), including CSF.
- 17          • SoCalGas should complete all customer “turn- on” orders, “no hot water” complaints  
18          and “no heat in wintertime” complaints in one day.
- 19          • UWUA recommends a comprehensive evaluation and update to SoCalGas’ CSF and  
20          other employee training programs, administered by the UWUA Power for America  
21          Training Trust Fund (P4A), including pre-hire preparation, curricula review,  
22          augmenting trainer skills, mentoring and coaching and operational qualifications of  
23          instructors.

24           **III.    REBUTTAL TO PARTIES’ O&M PROPOSALS – NON-SHARED COSTS**

25           **A.     CSF Operations Cost Category**

26           The CSF Operations cost category consists of labor and non-labor expenses for field  
27 technicians who provide service at customer premises, including both customer- and company-  
28 generated work orders. Examples of customer-generated service orders include customer  
29 requests to establish/remove gas service, light gas pilots, check gas appliances, shut off and  
30 restore gas service for fumigation, investigate the cause of high bills, respond to emergency  
31 incidents (e.g., structure fires), investigate reports of potential gas leaks, and other services.  
32 Examples of company-generated work orders include performing meter and regulator changes

---

<sup>15</sup> Exs. UWUA-1, 2, 3, 9, 10, “Testimony of UWUA Witnesses Carl Wood, Jerry Acosta, Robin Downs, Mike Barber and Jami Simon”.

1 and other meter work to maintain company assets, and collecting customer payments for  
 2 delinquent bills, the latter of which is typically performed by field collectors.

3 Table SAF-3 below provides a summary comparison of the parties' respective TY 2016  
 4 forecasts for each of the elements that make up the TY 2016 forecast for the CSF Operations cost  
 5 category.

6 **TABLE SAF-3**  
 7 **Summary Comparison – CSF Operations Cost Category**

TY 2016 Forecast – Constant 2013 (\$000)		
	SoCalGas	ORA
2013 Adjusted-Recorded Costs	105,908	105,908
TY 2016 Forecast – Order Volumes and Other Variables (Excluding Customer Growth)	6,940	1,545
<i>Subtotal</i>	<b>112,848</b>	<b>107,453</b>
Adjustment to Account for Customer Growth	1,904	635
Adjustment to Account for Increased Drive Time Due to Increased Traffic Congestion	1,395	465
Adjustment to Account for Efficiency Improvements	(75)	(75)
<b>Other Incremental Funding Requests:</b>		
Appliance Safety Checks (Proposed New Service)	1,337	1,738
Enhanced Customer Education (Proposed New Service)	1,367	
Outreach Safety Checks (Proposed New Service)	2,509	
Refresher Training for Field Technicians	447	447
Job Shadowing/Retiree Knowledge Transfer	398	0
Operator Qualification Training	738	246
New MSA Inspection Program	4,899	1,633
Curb Meter Regulator Replacements	177	177
<b>Total</b>	<b>127,945<sup>16</sup></b>	<b>112,720<sup>17</sup></b>

8 **1. ORA**

9 ORA takes issue with SoCalGas' TY 2016 forecast for the CSF Operations cost category.  
 10 In its testimony (Ex. ORA-13), ORA makes the statements and assertions reproduced below as  
 11 its justification for recommending a TY 2016 forecast that is significantly less than SoCalGas  
 12 proposes, i.e., \$112,720 million versus \$127.945 million. Each of ORA's assertions regarding  
 13 the cost elements itemized in Table SAF-3 above is rebutted below.

<sup>16</sup> Numbers do not add due to rounding.

<sup>17</sup> Numbers do not add due to rounding.



1 order-type-by-order type forecasts account for variables relevant to each order type.  
2 For example, for order types with year-to-year, up and down fluctuations in volume, as  
3 well as other order types for which volumes are primarily driven by factors outside of  
4 SoCalGas' control (e.g., weather, the state of the economy, customer turnover, the  
5 level of natural gas prices, emergency incidents such as structure fires and area odors,  
6 etc.), SoCalGas' order volume forecasts are based on multi-year averages of sufficient  
7 length to capture cyclical conditions because variables influencing order volumes vary  
8 from year to year. For order types impacted at least in part by technology changes  
9 (e.g., migration of single-family homes from piloted to pilotless forced air space  
10 heating appliances), SoCalGas considered both order volume patterns and likely  
11 impacts of such technology changes over time. For example, for "seasonal orders",  
12 SoCalGas used base year ("BY") 2013 order volumes to forecast TY 2016 order  
13 volumes. For order volumes impacted by specific laws or regulations, SoCalGas'  
14 order volume forecasts take into account the timing and expected impacts.<sup>23</sup>

15 ORA reiterates SoCalGas' TY 2016 forecasting premise in its own testimony,  
16 "Relying solely on total order volume trends, rather than order volume trends for each  
17 individual work order type, would ignore key factors impacting individual order  
18 types."<sup>24</sup> Notably, while ORA embraces this concept, ORA does not present in its  
19 testimony a proposed CSF order volume forecast associated with its TY 2016 cost  
20 forecast, either in total or by individual order type. Nor does ORA contest any of  
21 SoCalGas' work order volume forecasts for any individual order type.

- 22 • *Drive Time* - The time it takes field technicians to travel to customer premises.  
23 Average drive time per work order has steadily increased from year to year, from 10.4  
24 minutes in 2009 to 11.5 minutes in 2013, due to increasing traffic congestion.<sup>25</sup> ORA  
25 supports SoCalGas' projected 1% per year increase in average drive time per order (i.e.,  
26 from an average of 11.5 minutes per order in 2013 to an average of 11.8 minutes per  
27 order in TY 2016), but ORA recommends "normalizing" SoCalGas' TY2016 cost  
28 forecast "by dividing by three" to arrive at its proposed funding level.<sup>26</sup> ORA's  
29 specific assertions regarding drive time are addressed later in my testimony.
- 30 • *On Premise Time* – Each CSF work order type has an associated on premise average  
31 order completion time. On premise times can change over time to the extent changes in  
32 procedures or new safety requirements are implemented for a particular order type.  
33 Average on premise time per order has steadily increased from 15.59 minutes in 2009  
34 to 17.53 minutes in 2013.<sup>27</sup> SoCalGas' TY 2016 forecasting model accounts for the

---

<sup>23</sup> SoCalGas' graphical order volume charts showing order volume patterns by individual order type were provided in Ex. SCG-10-WP, pages 28-77. The same graphical order volume charts, updated to include 2014 results, are attached to this testimony as Appendix A.

<sup>24</sup> Ex. ORA-13, page 47, lines 14-16.

<sup>25</sup> Ex. SCG-10, page 12, Table SAF-8.

<sup>26</sup> Ex. ORA-13, page 52, lines 20-21.

<sup>27</sup> Ex. SCG-10, page SAF-13, Table SAF-9. SoCalGas identified an error in the calculation of its 2013 average on premise time per order. The correct figure for 2013 is 17.53 minutes rather than 17.74 minutes. This correction does not impact SCG's TY 2016 forecast, as TY 2016 forecasts were prepared by individual order type.

1 specific average on premise time associated with each order type.<sup>28</sup> For work order  
2 types where Engineering Labor Standards (“ELS”) study data was available, SoCalGas  
3 used the ELS data as the basis for its on premise time forecasts for each applicable  
4 order type. For all other order types, SoCalGas used 2013 average on premise times for  
5 each order type because the most current procedures and safety requirements are  
6 reflected in 2013 average on premise times for each order type.<sup>29</sup>

7 In its testimony, ORA does not raise any objections or concerns regarding  
8 SoCalGas’ TY 2016 forecast of average on premise times per order type. However,  
9 ORA’s proposed forecast methodology (i.e., six-year average total costs) does not  
10 account for the TY 2016 forecast of average on premise time per order. Rather,  
11 ORA’s reliance on a “six-year average (2009-2014) total cost” forecasting  
12 methodology ignores trends in average on premise times per order altogether, and  
13 should therefore be rejected.

- 14
- 15 • *Non-Job Time, Training Time, Vacation and Sickness and Wage Rate* - In addition to  
16 drive time and on premise time being converted to hours and then full-time equivalents  
17 (“FTEs”) to determine costs using SoCalGas’ forecasting model, the appropriate non-  
18 job time (for start/end of day non-order work, breaks, etc.); training time; and the  
19 SoCalGas vacation and sickness factors were applied to compute forecasted FTEs.  
20 SoCalGas used a blended wage rate for the various CSF job classifications to compute  
21 total labor expense.<sup>30</sup> In its testimony, ORA did not present any objections to  
22 SoCalGas’ TY 2016 forecasting assumptions for any of these variables that impact TY  
23 2016 CSF Operations costs, i.e., non-job time, training time, vacation and sickness  
24 time, or wage rate.
  - 25 • *Non-Labor Expense* – SoCalGas used a five-year average (2009-2013) to forecast a TY  
26 2016 average non-labor cost per FTE for small tools, uniforms, materials, supplies and  
27 expenses.<sup>31</sup> ORA did not present any objections to SoCalGas’ proposed TY 2016  
28 forecast methodology for non-labor expenses.

29 As summarized above, SoCalGas provided detailed rationale and substantiation for each  
and every planning assumption used in its forecast of TY 2016 costs, including the forecast model

---

<sup>28</sup> Ex. SCG-10-WP, page 19.

<sup>29</sup> Ex. SCG-10, pages SAF-13-14.

<sup>30</sup> Ex. SCG-10, pages SAF-14-15.

<sup>31</sup> Ex. SCG-10, page SAF-15, lines 4-6.

1 SoCalGas used to analyze the net effect of different variables that drive CSF Operations costs.<sup>32</sup>  
2 In its testimony, ORA did not present any objections to or contest SoCalGas' forecast  
3 methodology or projected TY 2016 order volumes for any individual work order type. ORA did  
4 not object to SoCalGas' projected average drive time per work order. ORA did not object to  
5 SoCalGas' projected average on premise time for any individual work order type. Nor did ORA  
6 object to any of the other forecasting assumptions contained in SoCalGas' TY 2016 forecast (i.e.,  
7 non-job time, training time, vacation and sickness time). ORA used a broad-brush approach (i.e.,  
8 six-year average 2009-2014 total costs) as the sole basis for its forecast and did not raise any  
9 objections regarding the detailed facts and assumptions presented in Exs. SCG-10 and SCG-10-  
10 WP. For the aforementioned reasons, the Commission should reject ORA's broad-brush use of a  
11 six-year average total cost forecasting methodology because it does not account for key factors  
12 that will impact TY 2016 CSF Operations costs.

13           Second, ORA states, "*SCG's request for an increase of 20.81% over 2013 adjusted-*  
14 *recorded expenses is not justified.*" (Ex. ORA-13, page 46, lines 13-14)

15           Aside from relying solely on total average annual CSF Operations costs from 2009-2014  
16 and total work order volumes from 2009-2013, ORA provides no analysis or substantiation in its  
17 testimony or workpapers to justify its assertion. Contrary to ORA's assertion, and as described  
18 above, SoCalGas provided detailed justification for all of its incremental funding requests,  
19 including the basis for all TY 2016 forecasting assumptions and calculations.<sup>33</sup> SoCalGas also  
20 responded to numerous ORA data requests. Nowhere in ORA's testimony does ORA criticize,  
21 contest or take issue with any specific forecasting assumption upon which SoCalGas relied.

22           Third, ORA states,

23                     *SCG's forecast for its CSF Operations includes incremental funding of*  
24                     *\$6.940 million over 2013 recorded expenses for activity associated with*

---

<sup>32</sup> As reflected in SoCalGas' response to ORA-SCG-DR-052-TLG, Q.6., a copy of which is provided in Appendix C of this testimony, SoCalGas' forecast of required funding for its Customer Services Field – Operations area is, at its core, based on activity levels. SoCalGas prepared a work order volume forecast, then factored in multiple variables (i.e., on premise time per work order, drive time per order (to travel to and from each work order), vacation & sickness rates, non-job time rates (e.g., for start/end of day non-order work, breaks, etc.), and training time rates) to calculate the necessary hours ("FTEs") to perform the volume of forecasted work. To determine required funding, SoCalGas multiplied the total hours by a blended wage rate. For the TY 2016 forecast, SoCalGas used 2013 base year data to calculate a blended wage rate of \$37.77 per hour. This rate is a blend of all CSF job classifications and includes straight-time and overtime.

<sup>33</sup> Exs. SCG-10, pages SAF-6-15, and SCG-10-WP, pages 17-77.

1                    *its work order volumes. ORA recommends incremental funding of*  
2                    *\$1.545 million over 2013 adjusted-recorded expenses in the TY for this*  
3                    *activity. (Ex. ORA-13, page 46, lines 20-22, and page 47, line 1)*

4                    ORA's sole basis for recommending \$1.545 million in incremental funding above 2013  
5 adjusted-recorded levels is that ORA's proposed six-year forecasting methodology (based on total  
6 historical CSF Operations costs from 2009-2014) yields costs that are \$1.545 million above 2013  
7 adjusted-recorded levels. ORA's broad-brush forecasting methodology ignores the merits of  
8 SoCalGas' order type-by-order type forecasts, which are based on order volume patterns and  
9 other factors specific to each order type.

10                  As described above and in Ex. SCG-10 (pages SAF-6-15), in addition to work order  
11 volumes, TY 2016 costs are impacted by other variables, including on premise time, drive time,  
12 non-job time, training time, vacation and sickness time, wage rates and non-labor costs per FTE  
13 which, with the exception of drive time, ORA's testimony completely ignores.

14                  Given that ORA did not raise any objections or concerns about any of the specific  
15 assumptions SoCalGas used to develop its TY 2016 forecast (i.e., order volume forecasts by order  
16 type, average drive time per order, average on premise time by order type, non-job time, training  
17 time, vacation and sickness time, wage rate and non-labor costs per FTE assumptions), it can be  
18 inferred that SoCalGas' forecasting assumptions are reasonable and should be adopted.

19                  Fourth, ORA states, "*SCG's 2008 and 2012 GRCs included reductions to SCG's total*  
20 *order volume forecast as a whole and not at the individual order type level.*" (Ex. ORA-13, page  
21 *46, footnote 127)*

22                  In SoCalGas' 2008 and 2012 GRC proceedings, none of the parties forecasted order  
23 volumes at the individual order type level. In the 2012 GRC, SoCalGas was criticized by TURN  
24 for its use of a broad-brush, five-year average forecasting methodology for order volumes.<sup>34</sup> The  
25 Commission's decision<sup>35</sup> gave credence to TURN's criticism; hence, in the present GRC  
26 SoCalGas has taken a more rigorous approach and developed numerical and graphical order  
27 volume forecasts at the individual order type level.<sup>36</sup>

---

<sup>34</sup> Ex. TURN-Marcus "Results of Operations Issues for Southern California Gas Company's 2012 General Rate Case", pages 35-38, filed in response to Applications 10-12-005 and 10-12-006.

<sup>35</sup> D.13-05-010, page 497, lines 3-8.

<sup>36</sup> Exs. SCG-10, pages SAF-7-10, and SCG-10-WP, pages 28-77.

1 In its testimony, ORA does not identify any order volume forecasts, at the order type level,  
2 to which ORA objects. Nor does ORA propose any alternative order volume forecast for TY  
3 2016.

4 After reviewing ORA's testimony, SoCalGas sent the following data request to ORA  
5 regarding SoCalGas' order volume forecasts by individual order type:<sup>37</sup>

6 At Exhibit ORA-13, page 47, lines 11-13, ORA indicated it "reviewed and  
7 analyzed each individual work order type SCG provided in its testimony, in order  
8 to determine the historical order volume trend for each individual work order  
9 type". Of the 50 order types ORA reviewed and analyzed, which individual order  
10 type forecasts does ORA object to and why?

11 ORA responded as follows:

12 "See ORA's testimony on pages 47-49 and ORA's response to Q.2 above."

13 ORA's response to Q.2. (which pertained only to SDG&E, not SoCalGas), was as follows:

14 **Regarding "which individual order type forecasts does ORA object to and**  
15 **why," note that ORA's testimony did not state that it objected to SDG&E's**  
16 **"individual order type forecasts." [Emphasis added]**

17 As discussed in ORA's testimony on page 11, ORA reviewed and analyzed each  
18 individual work order type SDG&E provided in its testimony, in order to  
19 determine the historical order volume trend for each work order type. Regarding  
20 forecasts and historical trends for Work Order Volumes, in response to ORA-  
21 SCG-052-TLG, Q. 22-d, SCG states, "Relying solely on total order volume  
22 trends, rather than order volume trends for each individual work order type, would  
23 ignore key factors impacting individual order types." ORA discovered that, of the  
24 fifty-six work order types shown, thirty-two of them showed declining trends in  
25 order volumes between 2009-2013. SDG&E's 2014 adjusted-recorded expenses  
26 of \$13.243 million includes its work order volumes and its 2014 expense level is  
27 \$2.435 million lower than its 2013 expense levels of \$15.678 million. SDG&E's  
28 testimony and workpapers did not include any historical cost data associated with  
29 each of its fifty-six work order types for analysis.

30 ORA's response did not address the question. As reflected in ORA's response, ORA's  
31 use of a broad-brush forecasting methodology (i.e., six-year average total costs) ignores the  
32 merits of SoCalGas order volume forecasts by individual order type.

33 Fifth, ORA states, "*SCG's total work order volumes declined by 653,003 between 2009-*  
34 *2013, from 4,318,794 in 2009 to 3,665,791 in 2013, compared to SCG's TY 2016 forecast of*

---

<sup>37</sup> A copy of SoCalGas' data request, SEU-ORA-DR-06, Q. 3, and ORA's response are provided in Appendix B. ORA's responses to both Questions 2 and 3 are provided in Appendix B given that ORA refers to Q.2. for its response to Q.3.



1 4,043,617 orders. SCG did not provide its recorded 2014 work order volumes.” (Ex. ORA-13,  
2 page 47, lines 6-11; footnote 130)

3 ORA relies on 2014 adjusted-recorded CSF Operations costs (which are \$2.171 million  
4 higher than 2013 adjusted-recorded costs) for its TY 2016 forecast, yet ORA ignores 2014 order  
5 volumes and other associated variables that impact overall costs. 2014 order volume data was  
6 not available when SoCalGas prepared and submitted its GRC Application, nor did SoCalGas  
7 receive any data requests from any party, including ORA, requesting 2014 order volume data.<sup>38</sup>

8 ORA applies a very broad-brush approach to its analysis of 2009-2013 work order  
9 volumes whereas SoCalGas’ TY 2016 forecast takes into account both the order volume patterns  
10 over time and other factors impacting each order type.<sup>39</sup> ORA has not raised any objections to or  
11 contested SoCalGas’ order volume forecast for any specific order type.

12 Given that ORA also has not raised any objections or concerns regarding SoCalGas’ TY  
13 2016 forecasting assumptions for average drive time per order; average on premise time per order,  
14 by order type; non-job time; training time; vacation and sickness time; wage rates; and non-labor  
15 costs per FTE; for comparison purposes only, SoCalGas used its TY 2016 forecasts for each of  
16 these variables and calculated total costs associated with work order volumes assuming five- and  
17 six-year average historical order volumes for all order types (with the exception that for meter  
18 changes<sup>40</sup> the order volume forecasts are consistent with SoCalGas’ TY 2016 forecasts for the  
19 reasons noted in footnote 40 below). The results of the comparison are as summarized in Table  
20 SAF-4 below.

---

<sup>38</sup> Ex. SCG-10-WP, pages 28-77, updated to include 2014 data, are provided in Appendix A of this testimony.

<sup>39</sup> Exs. SCG-10, pages SAF-7-10, and SCG-10-WP, pages 28-77.

<sup>40</sup> ORA’s forecast methodology ignores SoCalGas’ response to ORA-SCG-DR-052-TLG (Q.25.c-d.), which states: The 2008 Settlement Agreement with DRA and TURN, Decision (D.) 08-07-046, explicitly authorized SoCalGas to “strive to perform 180,000 planned meter change-outs”. The 180,000 meter changes identified in D.08-07-046 include curb and above ground meters. In the 2012 GRC, SoCalGas forecasted 180,000 meter replacements, the same that were authorized in D.08-07-046. Although the 2012 GRC decision, D.13-05-010, reduced SoCalGas’ CSF overall forecast, there was not an explicit reduction made to the forecasted meter replacements. As stated in the response to Question 4.a. in data request ORA-SCG-DR-021-DAO, over the course of the AMI deployment period (2013-2017), all GRC- and AMI-funded planned meter change-outs will be completed.

1 **TABLE SAF-4**

2 **Comparison of Results of Forecasting Methodologies**

3 **(2013 Dollars, \$000)**

<b>Forecasting Methodology</b>	<b>TY 2016 Forecast Excluding Increased Drive Time and Customer Growth</b>	<b>Adjustment to Account for Increased Drive Time Due to Increased Traffic Congestion</b>	<b>Adjustment to Account for Customer Growth</b>	<b>Total</b>
ORA's TY 2016 Forecast <sup>41</sup>	107,454	465	635	108,554
SoCalGas' TY 2016 Forecast <sup>42</sup>	112,849 <sup>43</sup>	1,395	1,904	116,148
Resulting Forecast Assuming <i>Five-Year Average</i> Order Volumes (2009-2013)	115,201	1,431	1,993	118,625
Resulting Forecast Assuming <i>Six-Year Average</i> Order Volumes (2009-2014)	113,398	1,406	1,960	116,764

4 As reflected in Table SAF-4 above, use of five- or six-year year average order volumes for  
 5 each order type, as ORA's proposed forecasting methodology implies (given the absence of any  
 6 specific order volume forecast presented by ORA), results in higher forecasted TY 2016 costs  
 7 than does SoCalGas' proposed order type-by-order type forecast methodology.

8 Sixth, ORA states,

9 *Relying solely on total order volume trends, rather than order volume*  
 10 *trends for each individual work order type, would ignore key factors*  
 11 *impacting individual order types. ORA discovered that, of the fifty work*  
 12 *order types shown, thirty of them showed declining trends in order*  
 13 *volumes between 2009-2013... (Ex. ORA-13, page 47, lines 14-17)*

<sup>41</sup> Based on six-year average total CSF Operations costs (2009-2014).

<sup>42</sup> Costs reflect SoCalGas' order type-by-order type forecasted volumes and SoCalGas' TY 2016 forecast assumptions for average drive time per order, average on premise time per order, non-job time, training time, vacation and sickness time, wage rate and non-labor cost per FTE.

<sup>43</sup> SoCalGas identified a \$4,000 dollar calculation error related to the allocation of costs between the forecast excluding incremental drive time and customer growth (column 2) and the impact of customer growth (column 4). The \$112,849 shown for the TY 2016 forecast excluding the effects of incremental drive time and customer growth should be \$112,853. The \$1,904 shown for the impact of customer growth should be \$1,900. Because the correction is immaterial in magnitude and has no impact on the total forecast for the CSF Operations cost category, or SoCalGas' overall forecast, no adjustments have been made throughout any of this testimony to account for the \$4,000 allocation error.

1           Order volume patterns, factors impacting each order type, and the rationale for  
2 SoCalGas' proposed order volume forecasting methodology, for each individual order type, are  
3 set forth in detail in the testimony and workpapers of SoCalGas witness Sara Franke.<sup>44</sup> As  
4 reflected in the summary provided in Table SAF-5 below, nine order types experienced declines  
5 in order volumes each year during the period from 2009-2014. Most order types experienced up  
6 and down fluctuations in order volumes from year to year. One order type experienced increasing  
7 volumes in each of the six years.

8 //

9 //

10 //

---

<sup>44</sup> Exs. SCG-10, pages SAF-7-11, and SCG-10-WP, pages 28-77.

1  
2  
3

**TABLE SAF-5**  
**Order Volume Patterns by Individual Order Type**  
**Based on 2009-2014 Order Volumes<sup>45</sup>**

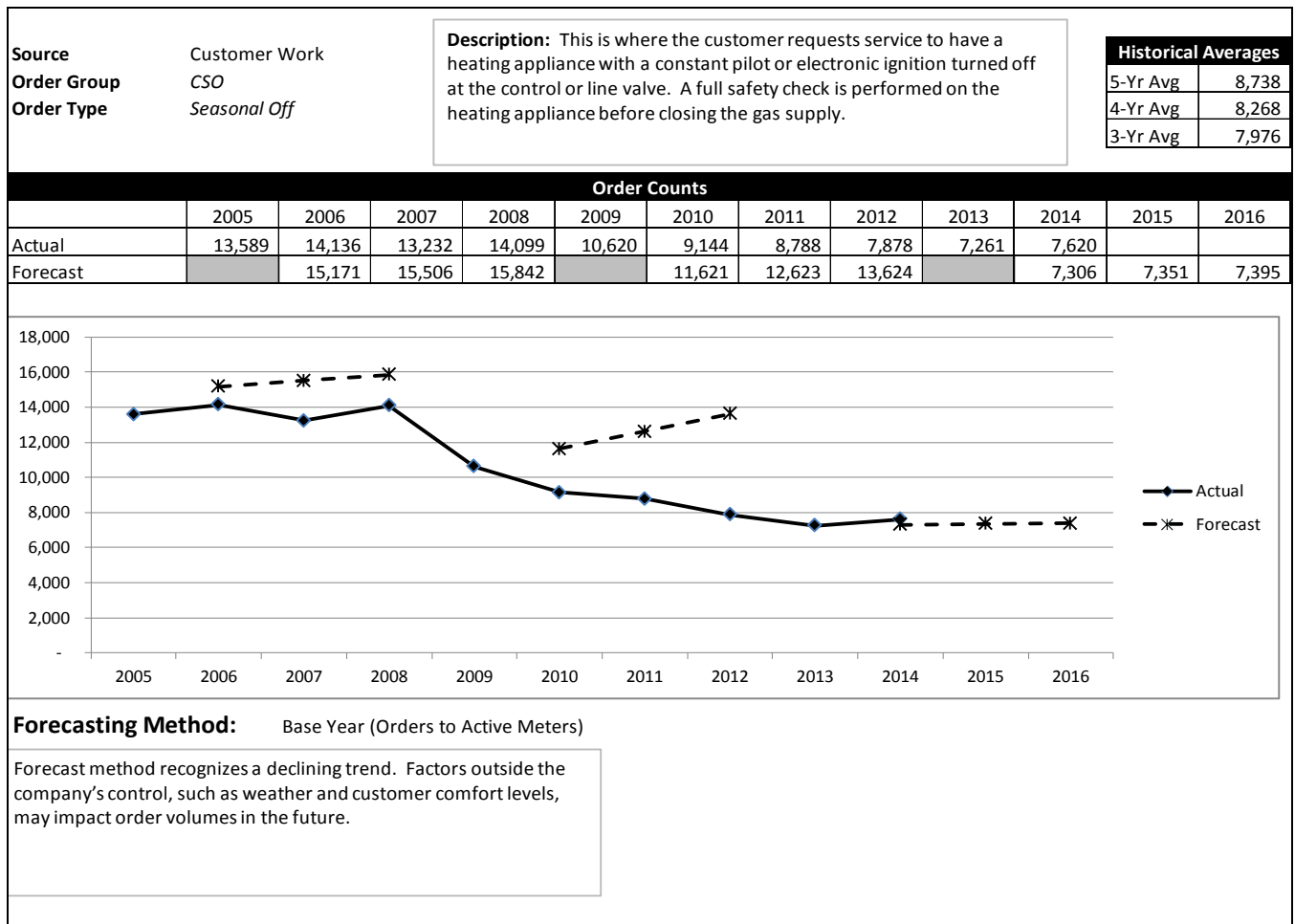
<b>Order Types With Decreasing Volumes Each Year</b>	<b>Order Types With Up and Down, Fluctuating Volumes Each Year</b>	<b>Order Types With Increasing Volumes Each Year</b>
1. Change of Account – Close (Soft)	1. Change of Account – Turn On (Not Entered)	1. Commercial/Industrial - ISO
2. Credit/Collections - Collect/Close (2nd Call)	2. Credit/Collections - 48 Hour (1st Call)	
3. Credit/Collections - Returned Check	3. Credit/Collections - Tenant Notification	
4. Gas Leak - Pilot Out Only	4. Credit/Collections - Other	
5. NonPay Turn On - Turn On	5. CSO	
6. Read/Verify - Verify - Soft Close	6. CSO - CO-Test	
7. Read/Verify - Verify - Soft Close - 180 Days	7. CSO - No Gas	
8. TurnOn/ShutOff - Turn On (Entered)	8. CSO - Seasonal Off	
9. TurnOn/ShutOff - Turn On Entered (Gas On)	9. CSO - Seasonal On	
	10. Gas Leak - CSO Leak	
	11. Gas Leak - Leak Investigation (Step2)	
	12. Fumigation - Turn On	
	13. Fumigation – Close	
	14. Read/Verify – Verify	
	15. Read/Verify - Load Survey - Res	
	16. TurnOn/ShutOff - Turn On (Back On/Restore)	
	17. TurnOn/ShutOff - Turn On (PSI)	
	18. TurnOn/ShutOff - Close (Hard)	
	19. Miscellaneous - Service Order (MSO)	
	20. Miscellaneous - Meter & Reg (MMR)	
	21. Miscellaneous – Assist	
	22. Food Industry - Turn On (Entered)	
	23. Food Industry – CSO	
	24. Food Industry - CSO Leak	
	25. C/I - Load Survey- I/C	
	26. C/I - Turn On (Entered)	
	27. Cust/Comp Work – Other	
	28. C/I – CSO	
	29. HBI – Entered	
	30. HBI - Not Entered	
	31. Meter Work (O&&M) - Meter Reset – T/O	
	32. Meter Work (O&&M) - Meter Reset - Off	
	33. Meter Work (O&&M) - Meter Remove	
	34. Incomplete	

<sup>45</sup> Source: Ex. SCG-10-WP, pages 28-77, updated to include 2014 data in Appendix A of this testimony. Capital meter work orders and meter change work orders are excluded. Capital costs are sponsored by SoCalGas witness Frank Ayala, Ex. SCG-04. Meter change work orders are excluded for the reasons described in footnote 40 of this testimony.

1 SoCalGas' TY 2016 forecast takes into account order volume patterns and variables  
 2 impacting order volumes, by individual order type. For example, until experiencing an increase in  
 3 volume in 2014, volumes for "Seasonal Off" work orders had declined each year from 2009-2013,  
 4 at least in part due to technology changes (i.e., a gradual migration from piloted to pilotless forced  
 5 air space heating equipment in single family homes). As illustrated in Table SAF-6 below,  
 6 SoCalGas relied on BY 2013 order volumes for its TY 2016 forecast for this order type.

7 **TABLE SAF-6<sup>46</sup>**

8 **Order Volume Forecast for "Customer Service Order – Seasonal Off" Work Order**

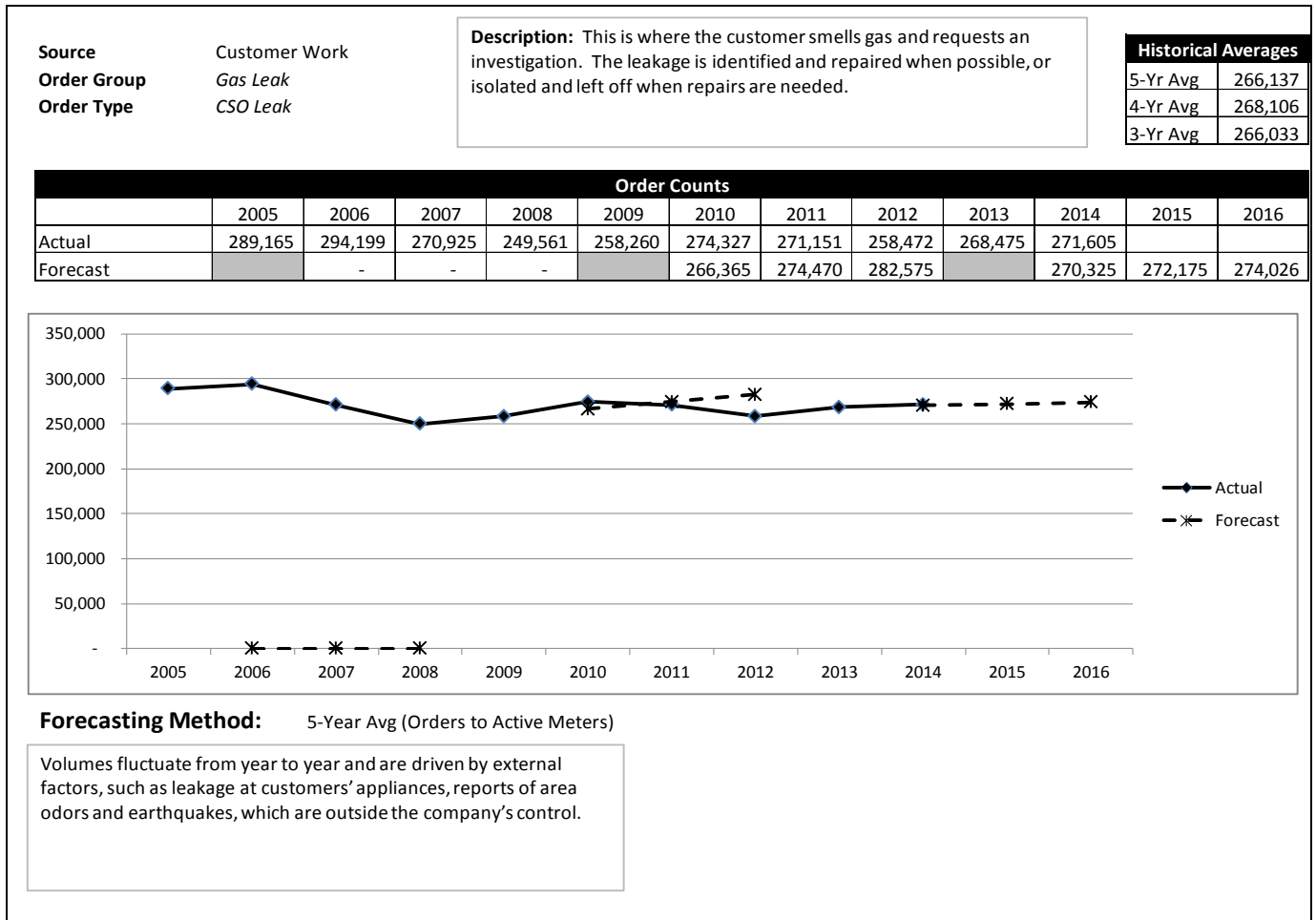


9 Table SAF-7 below provides an example of SoCalGas' order volume forecast for a work  
 10 order type, i.e., Gas Leak – CSO Leak, for which volumes fluctuated up and down during the  
 11 period from 2009-2013.  
 12  
 13

<sup>46</sup> Excerpted from Ex. SCG-10-WP, page 38, updated to include 2014 data.

TABLE SAF-7<sup>47</sup>

Order Volume Forecast for “Gas Leak – CSO Leak” Order Type



ORA’s above assertion does not provide a complete picture of the data presented in SoCalGas’ testimony and workpapers.<sup>48</sup> Again, ORA did not present in its testimony, or in its above response to SoCalGas’ data request, any concerns with any of SoCalGas’ TY 2016 order volume forecasts for any individual order type. Nor did ORA present a proposed order volume forecast of its own. For the reasons set forth above, ORA’s broad-brush forecast methodology should be rejected.

Seventh, ORA states, “SCG’s testimony and workpapers did not include any historical cost data associated with each of its fifty work order types... and SCG was not able to produce historical costs by order type upon being asked for that information.” (Ex. ORA-13, page 48,

<sup>47</sup> Excerpt from Ex. SCG-10-WP, page 40, updated to include 2014 order volume.

<sup>48</sup> Exs. SCG-10, pages SAF-10-11, and SCG-10-WP, pages 28-77.

1 *lines 3-5)*

2 While SoCalGas has not historically captured and tracked costs by individual work order  
3 type, SoCalGas provided ORA with historical data necessary to estimate such costs including,  
4 for example, applicable wage rates for field technicians,<sup>49</sup> historical order volumes by order  
5 type,<sup>50</sup> historical average drive time per work order,<sup>51</sup> and historical average on premise time per  
6 work order.<sup>52</sup>

7 More importantly, SoCalGas provided ORA with a compact disc (“CD”) copy of the  
8 Excel forecasting model SoCalGas used as the basis for its TY 2016 forecast, including all  
9 forecasting assumptions for each specific work order type.<sup>53</sup> The model contains the order  
10 volume forecast for each work order type, based on the forecasting methodologies set forth in  
11 Exs. SCG-10, pages SAF-7-11, and SCG-10-WP, pages 28-77. The model then factors in  
12 multiple variables (i.e., average on premise time by work order, average drive time per order (to  
13 travel to and from each work order), vacation & sickness rates, non-job time rates (e.g., for  
14 start/end of day non-order work, breaks, etc.), and training time rates) to calculate the necessary  
15 hours (FTEs) to perform the volume of forecasted work. To determine required funding,  
16 SoCalGas multiplied the total hours by a blended wage rate. For its TY 2016 forecast, SoCalGas  
17 used a five-year average straight-time-to-overtime ratio and BY 2013 wage data to calculate a  
18 blended wage rate of \$37.77 per hour. This rate is a blend of all CSF job classifications and  
19 includes straight-time and overtime.

20 ORA has not raised any objections to or contested any of the forecasting assumptions  
21 SoCalGas used in developing its TY 2016 forecast. Rather, ORA merely makes a broad-brush  
22 and erroneous assumption that because “historical costs” are not captured and tracked by order  
23 type, it is not possible to forecast future costs. ORA’s assertion that the TY 2016 forecast must  
24 equal average annual 2009-2014 costs, strictly because historical costs are not available by order  
25 type, is not based on the facts, analysis and detailed CSF forecasting model made available to  
26 ORA in SoCalGas’ testimony (Ex. SCG-10), workpapers (Ex. SCG-10-WP) and responses to  
27 ORA data requests and should be rejected.

---

<sup>49</sup> SoCalGas’ response to ORA-SCG-DR-052-TLG (Q.8.).

<sup>50</sup> Ex. SCG-10, pages SAF-10-11, and SCG-10-WP, pages 28-77.

<sup>51</sup> Ex. SCG-10, page SAF-12.

<sup>52</sup> Ex. SCG-10, page SAF-13.

<sup>53</sup> Ex. SCG-10-WP, pages 17-27.

1 Eighth, ORA states,

2 *SCG's response does not demonstrate that it requires incremental*  
3 *funding of \$6.940 million (\$20.820 million over three years), especially*  
4 *with declining historical trends in the majority of its work order types.*  
5 *Providing historical cost data associated with specific TY requests for*  
6 *incremental funding is a GRC requirement and should be provided*  
7 *without difficulty. (Ex. ORA-13, page 48, lines 19-21, and page 49,*  
8 *lines 1-2)*

9 SoCalGas provided historical cost data by cost category in both its workpapers and in  
10 response to data requests.<sup>54</sup> Historical cost information was provided in accordance with the Rate  
11 Case Plan. As SoCalGas clearly stated in response to ORA data request ORA-SCG-DR-052-  
12 TLG, Q.21d-e,<sup>55</sup> historical cost data at an order type level has not been captured by SoCalGas  
13 systems. Recording actual costs by each individual completed order is not a need that has ever  
14 existed in the past.

15 ORA's broad-brush assertions ignore the merits of SoCalGas' TY 2016 forecasting model.  
16 As emphasized previously, nowhere in its testimony does ORA raise any specific concerns about  
17 any of SoCalGas' individual order volume forecasts for any order type. Nor does ORA raise any  
18 concerns or objections regarding any of SoCalGas' forecasting assumptions for other key  
19 variables that impact TY 2016 CSF Operations costs (i.e., average on premise time per order,  
20 average drive time per order, non-job time, training time, vacation and sickness time, wage rates  
21 and average non-labor costs per FTE). SoCalGas provided ample data for ORA to be able to  
22 analyze and evaluate the reasonableness of all of SoCalGas' forecasting assumptions. However,  
23 rather than dig into the details and merits of SoCalGas' TY 2016 forecasting methodology, and  
24 cite any concerns with any aspect of any of SoCalGas' forecasting assumptions, ORA merely  
25 makes broad-brush assertions which should be rejected.

26 Ninth, ORA states,

27 *SCG's CSF staff members were able to analyze and develop an order*  
28 *volume forecast utilizing various methodologies for each of the fifty*  
29 *individual order types and calculate incremental ratepayer funding of*  
30 *\$6.940 million over 2013 recorded expense levels. However, when SCG*  
31 *is asked for the associated historical and forecast cost data for its order*

---

<sup>54</sup> Ex. SCG-10-WP, pages 6 and 185-186.

<sup>55</sup> A copy of SoCalGas' response to ORA-SCG-DR-052-TLG, Q. 21.d-e is provided in Appendix C of this testimony.



1 *volumes so they can be reviewed and analyzed, SCG is not able to*  
2 *provide the cost data in “any” format. (Ex. ORA-13, page 49, lines 2-7)*

3 As discussed previously, SoCalGas’ order type-by-order type forecast of order volumes is  
4 based on an analysis of each order type, order volume patterns over time associated with each  
5 individual order type, and factors impacting each work order type, which are largely outside the  
6 utility’s control (e.g., weather, the state of the economy, customer turnover, emergency incidents  
7 such as structure fires and customer reports of potential gas leaks, etc.). ORA did not raise any  
8 concerns about SoCalGas’ order volume forecasts for any individual order type.

9 Other factors impacting forecasted TY 2016 costs include average drive time per work  
10 order, average on premise time per work order, non-job time (e.g., for beginning of day/end of  
11 day preparation and wrap-up work and breaks), training time, vacation and sickness time, wage  
12 rates and average non-labor cost per FTE. While historical costs have never been captured or  
13 tracked by specific order type, SoCalGas provided ORA with ample data, including historical  
14 information, to evaluate the merits and reasonableness of SoCalGas’ forecasting assumptions.  
15 ORA did not raise any concerns or objections about any of the assumptions SoCalGas relied upon  
16 in developing its TY 2016 forecast.

17 Tenth, ORA states,

18 *ORA’s use of a six year average (2009–2014) for recorded expenses*  
19 *includes SCG’s order volumes activity, and captures year to year order*  
20 *volume and expense fluctuations impacted by external factors and*  
21 *provides SCG with incremental funding of \$1.545 million. (Ex. ORA-13,*  
22 *page 49, lines 8–11)*

23 ORA does not propose a TY 2016 order volume forecast in its testimony. Rather, ORA  
24 relies solely on six-year average costs (2009-2014) and assertions regarding 2009-2013 order  
25 volumes in developing its broad-brush forecast of TY 2016 costs. ORA’s forecasting  
26 methodology is inherently inconsistent (i.e., use of 2009-2014 costs and 2009-2013 order  
27 volumes) and ignores other factors impacting CSF operations costs (i.e., average drive time per  
28 order, average on premise time per order, non-job time, training time, vacation and sickness time,  
29 wage rates and non-labor costs per FTE).

30 ORA does not object to any of SoCalGas’ individual order volume forecasts, for any order  
31 type. Nor does ORA object to any of SoCalGas’ other forecasting assumptions that impact TY  
32 2016 costs (i.e., average drive time per order, average on premise time per order, non-job time,

1 training time, vacation and sickness time, wage rates, or non-labor costs per FTE). The  
2 combination of SoCalGas' individual order volume forecasts and other cost  
3 variables/assumptions, which ORA did not contest, yield a net incremental TY 2016 cost of  
4 \$6.940 million (excluding customer growth and increased drive time due to growing traffic  
5 congestion, which are addressed separately later in this testimony). ORA provides absolutely no  
6 substantiation or analysis demonstrating that \$1.545 million will cover all of the above-mentioned  
7 cost elements for which ORA raised no objections. Rather, ORA's figure of \$1.545 million is  
8 merely the difference between six-year average historical costs (2009-2014) and 2013 adjusted-  
9 recorded costs, a broad-brush approach that should be rejected given the uncontested, more  
10 detailed analysis and information SoCalGas presented in its testimony and workpapers.<sup>56</sup>

11 Lastly, ORA states,

12 *SCG's historical expenses (2009-2013) include costs incurred for one-*  
13 *time, non-recurring and unusual expenses (expenses incurred that are*  
14 *not necessary or required to operate the utility business). ORA*  
15 *discovered that SCG did not remove all these costs, which are*  
16 *incorporated into ORA's TY 2016 estimate and provides embedded*  
17 *funding that SCG can reallocate in the TY for proposed activities (Ex.*  
18 *ORA-13, page 49, footnote 135)*

19 SoCalGas' response to ORA's data request ORA-SCG-052-TLG, Q.17., did not identify  
20 any one-time, non-recurring or unnecessary costs.<sup>57</sup> Nor did ORA identify or quantify any such  
21 costs in its testimony. In order to obtain information regarding ORA's assertion, SoCalGas sent  
22 the following data request to ORA.<sup>58</sup>

23 Please provide the actual workpaper page or the Sempra Utility data request  
24 response attachment page that serves as the basis for the statements made  
25 throughout the prepared direct testimony by Ms. Tamera Godfrey in Exhibit  
26 ORA-13, as shown below in a. through e., regarding one-time and non-recurring  
27 costs that were not removed. Please also explain the basis for ORA's assertion  
28 that these are one-time and non-recurring expenses.

- 29 a. Customer Services Field (CSF) Operations on page 49, footnote 135:  
30 "SCG's historical expenses (2009-2013) include costs incurred for  
31 one-time, non-recurring and unusual expenses (expenses incurred that  
32 are not necessary or required to operate the utility business).

---

<sup>56</sup> Exs. SCG-10, pages SAF-7-11, and SCG-10-WP, pages 17-77.

<sup>57</sup> A copy of SoCalGas' response to ORA-SCG-052-TLG, Q.17., is provided in Appendix C.

<sup>58</sup> A copy of ORA's response to SoCalGas' data request is also provided in Appendix B.

1 In its response,<sup>59</sup> ORA states that one-time, non-recurring costs include, “brand  
2 awareness and loyalty surveys/campaigns/events,” and “expenses that show significant expense  
3 fluctuations from year to year.” ORA also asserts in its response:

4 Note that expenses associated with employee meals, luncheons, entertainment, gift cards,  
5 employee recognition, holiday events, various corporate events, tickets to sporting events,  
6 certain employee/company dues and memberships, and employee laundry are a few  
7 examples of the types of expenses SCG incurred between 2009-2013 that are not  
8 necessary or required to operate the utility’s business. ORA did not remove these  
9 expenses from its estimate, which provides SCG with embedded costs that can be  
10 reallocated in the TY for proposed activities.

11 Contrary to ORA’s assertion in its data response, there have been no costs associated  
12 with “brand awareness or loyalty surveys/campaigns/events” in the CSF Operations cost  
13 category. In addition, costs that fluctuate from year to year are *recurring* costs, i.e., while costs  
14 for some years may be higher than average and costs for other years may be lower than average,  
15 there are no costs that can be reallocated as ORA asserts. ORA did not quantify any specific  
16 examples to substantiate its assertion.

17 Costs for “employee meals, luncheons, entertainment, gift cards, employee recognition,  
18 holiday events, various corporate events, tickets to sporting events, certain employee/company  
19 dues and memberships, and employee laundry” totaled an average of \$31,494 dollars per year  
20 during the five-year period from 2009-2013 (excluding company uniforms), far short of the TY  
21 2016 funding required for CSF field technicians to complete TY 2016 forecasted work order  
22 volumes.

23 With respect to “employee recognition costs”, because bargaining unit employees do not  
24 participate in pay-for-performance incentives, nominal forms of employee recognition (e.g.,  
25 onsite meals, company apparel, etc.) are the only means SoCalGas has to recognize such  
26 employees for extraordinary performance. With respect to catered onsite breakfast “holiday  
27 events”, discontinuation may be subject to collective bargaining. With respect to ORA’s  
28 assertion regarding “laundry” costs, CSF Operations employees are required to wear company  
29 uniforms while performing their jobs (for employee, customer and public safety), which the  
30 company is contractually (pursuant to the parties’ collective bargaining agreement) obligated to  
31 provide and launder.

---

<sup>59</sup> A copy of ORA’s full response is provided in Appendix B.

1 SoCalGas used a five-year average to forecast non-labor expenses, recognizing that costs  
2 fluctuate from year to year. No party has contested SoCalGas' forecast of non-labor expenses  
3 for the CSF Operations cost category.

4 For the aforementioned reasons, ORA's proposal should be rejected.

5 **b. Adjustment to Account for Customer Growth**

6 ORA states,

7 *SCG's order volumes are based in part on its forecast growth in new business*  
8 *(expected meter growth of 1.9%) capital construction and related meter sets. ORA*  
9 *normalized SCG's forecast and recommends incremental funding of \$0.635*  
10 *million in the TY to address meter growth. (Ex. ORA-13, page 49, lines 16-18, and*  
11 *page 50, lines 1-2)*

12 SoCalGas' TY 2016 forecast reflects customer utilization of CSF services on an average-  
13 orders-per-active meter basis. As described in Ex. SCG-10 (page SAF-10), SoCalGas applied this  
14 "CSF usage rate" to the forecasted growth in the number of active meters projected in the  
15 testimony of SoCalGas witness Rose-Marie Payan (Ex. SCG-30) to forecast TY 2016 order  
16 volumes. The TY 2016 forecasted order volumes for each order type, in most cases, are the  
17 product of the forecasted number of orders per active meter and the number of forecasted active  
18 meters in 2016.

19 Table SAF-8 below provides an illustrative example of the way SoCalGas accounts for  
20 customer growth in its TY 2016 forecast.

21 //

22 //

23 //

1 **TABLE SAF-8**

2 **Example of SoCalGas’ Orders-per-Active-Meters Forecast Methodology**

	Historical					Forecast	Forecast Methodology
	2009	2010	2011	2012	2013	2016	
Active Meters	5,480,314	5,516,668	5,549,177	5,576,355	5,606,113	5,709,903	
Miscellaneous - Service Order (MSO)	29,144	21,821	23,796	23,753	28,469	<b>26,151</b>	5 Year Average

3 **2016 Forecasted Orders**

4 = Average  $\left(\frac{2009 \text{ Orders}}{2009 \text{ Meters}}; \frac{2010 \text{ Orders}}{2010 \text{ Meters}}; \frac{2011 \text{ Orders}}{2011 \text{ Meters}}; \frac{2012 \text{ Orders}}{2012 \text{ Meters}}; \frac{2013 \text{ Orders}}{2013 \text{ Meters}}\right)$   
 × **2016 Forecasted Meters**

5 **26,151** = Average  $\left(\frac{29,144}{5,480,314}; \frac{21,821}{5,516,668}; \frac{23,796}{5,549,177}; \frac{23,753}{5,576,355}; \frac{28,469}{5,606,113}\right) \times 5,709,903$

6 **26,151** = Average (0.005317943; 0.003955467; 0.004288203; 0.004259593; 0.005078207)  
 × 5,709,903

7 **26,151** = 0.004579883 × 5,709,903

8 SoCalGas utilized the same orders-per-active-meters forecasting methodology in at least  
 9 its last two GRC proceedings.<sup>60</sup> ORA has in the past explicitly supported using an “orders-per-  
 10 active meters” forecasting methodology. For example, in SDG&E’s TY 2008 GRC, ORA states  
 11 in its testimony, “DRA recommends applying the 2006 recorded order per meter for CSF order  
 12 types to the estimated meter growth to forecast the TY 2008 customer services field workload  
 activity expenses.”<sup>61</sup>

13 The only rationale ORA provides for “normalizing” SoCalGas’ incremental funding  
 14 request to account for customer growth (which ORA defines as dividing SoCalGas’ TY 2016  
 15 funding request by three) is that capital meter work performed by CSF has declined between 2009  
 16 and 2013. ORA’s basis for proposing a disallowance of two-thirds of SoCalGas’ CSF Operations  
 17 O&M increase due to meter growth makes no sense. First, capital expenditures associated with  
 18 capital meter work performed by CSF are covered in the testimony of SoCalGas witness Frank  
 19 Ayala, Ex. SCG-04-R, and are not part of SoCalGas’ O&M forecast for the CSF Operations cost

---

<sup>60</sup> TY 2008 GRC: Application No. 06-12-010, Ex. SCG-7-E, page JPP-23, line 11-14; TY 2012 GRC: Application No. 10-12-006, Ex. SCG-07-R, page EF-15, line 17-21.

<sup>61</sup> TY 2008 GRC: Application No. 06-12-009/010, Ex. DRA-11, page 11-11, lines 8-10.

1 category. Additionally, CSF only performs capital meter work on small meters; large size meter  
2 capital work is performed outside of CSF and is recorded elsewhere. It appears that ORA's  
3 proposal is based on a misunderstanding of SoCalGas' orders-per-active-meters forecasting  
4 methodology.

5 Lastly, ORA's proposal to disallow two-thirds of the funding for customer growth implies  
6 that two-thirds of new customers should not be afforded the same CSF services as existing  
7 customers, which would not be appropriate, is illogical and should be rejected.

8 Second, ORA states, "*In SCG's 2008 and 2012 GRCs, it included requests for*  
9 *incremental funding to address meter growth rates, but its related order volumes show declines*  
10 *between 2009 and 2013, in spite of its meter growth.*" (Ex. ORA-13, page 50, lines 3-5)

11 The "related order volumes", according to ORA and upon which ORA relies in its  
12 testimony (Ex. ORA-13, pages 50-51), are again the three CSF capital work order types for  
13 capital meter work performed by CSF. As mentioned above, capital costs for capital meter work  
14 orders completed by CSF (i.e., the associated on premise time) are covered in the testimony of  
15 witness Frank Ayala, Ex. SCG-04-R, and are not included in the CSF Operations O&M cost  
16 forecast presented in my testimony. ORA's assertion appears to be based on a misunderstanding  
17 of SoCalGas' TY 2016 orders-per-active-meters forecasting methodology and should therefore be  
18 rejected.

19 In addition, ORA's forecast of customer growth in Ex. ORA-13 is inconsistent with  
20 ORA's growth forecast contained in Ex. ORA-03. In Ex. ORA-13, ORA is essentially proposing  
21 that SoCalGas' growth rate be reduced to one-third of SoCalGas' forecast (i.e., ORA proposes TY  
22 2016 funding of \$0.635 for customer growth versus \$1.904 million as proposed by SoCalGas),  
23 whereas in Ex. ORA-03, ORA recommends adopting a meter growth forecast of 0.74%  
24 (5,693,789 active meters for TY 2016) compared to SoCalGas' forecasted growth rate of 0.75%  
25 (5,709,903 active meters).<sup>62</sup> SoCalGas acknowledges that its "orders-to-active-meters"  
26 forecasting methodology for projecting CSF work order volumes (for applicable order types)  
27 would need to be adjusted to the extent any changes to the active meter growth forecast in witness

---

<sup>62</sup> Ex. SCG-30; SoCalGas witness Rose Marie Payan submitted a revised workpaper in April 2015 to correct an input error. The new revised forecasted active meter count for TY2016 is 5,712,414, a growth rate of 0.83% compared to 2015. The new forecasted active meters for TY 2016 is higher than the value SoCalGas used for its CSF order volume forecast. If the corrected active meter forecast were to be used for determining costs associated with CSF order volumes, costs would be \$0.230 million greater.

1 Payan's testimony are adopted.

2 Third, ORA states,

3 *SCG's forecast for CSF's order volumes, which showed order volume*  
4 *declines during a period when it had meter growth, should not be based*  
5 *on its forecasted growth. (Ex. ORA-13, page 51, lines 12-14 ) SCG's*  
6 *TY 2016 order volume estimates seem excessive when compared to*  
7 *historical order volumes. (Ex. ORA-13, page 51, lines 17-18)*

8 The "order volumes" to which ORA refers are again the three CSF capital work order  
9 types for capital meter work performed by CSF.<sup>63</sup> As mentioned previously, capital costs for  
10 capital meter work orders completed by CSF (i.e., on premise time) are covered in the testimony  
11 of witness Frank Ayala, Ex. SCG-04-R, and are not included in the CSF O&M cost forecast  
12 presented in my testimony. And, as mentioned previously, CSF does not perform all capital meter  
13 work. ORA's above assertions appear to be based on a misunderstanding of SoCalGas' TY 2016  
14 orders-per-active-meters forecasting methodology and should therefore be rejected.

15 Fourth, ORA states,

16 *SCG's TY 2016 forecast for its Order Volume related to meter growth appears to*  
17 *be calculated twice and overstates its estimate. SCG calculated its forecast of*  
18 *\$6.940 million for its total Order Volume forecast which includes the three order*  
19 *types related to meter/customer growth, and then calculated another TY estimate*  
20 *of \$1.904 million for customer growth. (Ex. ORA-13, page 52, footnote 142)*

21 Capital costs (on premise time) associated with the three order types to which ORA refers  
22 are not part of SoCalGas TY 2016 forecast for CSF Operations O&M costs. In any case, the  
23 orders-per-active meters forecast methodology was not used for the three capital work order  
24 types to which ORA refers, so there is no double counting. ORA's assertion again appears to be  
25 based on a misunderstanding of the way customer growth is accounted for in SoCalGas' forecast  
26 of TY 2016 order volumes, by order type, and should therefore be rejected.

27 c. **Adjustment to Account for Increased Drive Time Due to**  
28 **Increased Traffic Congestion**

29 As reflected in Ex. SCG-10, page SAF-12 (Table SAF-8), average drive time<sup>64</sup> per CSF  
30 work order has steadily increased each year from an average of 10.4 minutes per order in 2009 to

---

<sup>63</sup> Ex. ORA-13, pages 50-51.

<sup>64</sup> Each CSF order has an associated average drive time per order to allow the field technician time to travel to the customer's premise (between orders). (Ex. SCG-10, page 12, lines 8-9).

1 an average of 11.5 minutes per order in 2013. ORA supports SoCalGas' projected annual  
2 increase in drive time of 1% due to increasing traffic congestion (i.e., an average of 11.8 minutes  
3 per work order in TY 2016)<sup>65</sup>, but makes the following statements in its testimony, each of which  
4 will be rebutted below:

5 ORA states,

6 *ORA does not take issue with SCG's projected 1% increase in drive time for TY*  
7 *2016. ORA takes issue with SCG's calculated forecast of \$1.395 million. ORA*  
8 *normalized SCG's forecast and recommends incremental funding over 2013*  
9 *expense levels of \$0.465 million in the TY for SCG's proposed increase in drive*  
10 *time. (Ex. ORA-13, page 52, lines 13-22)*

11 In SoCalGas' 2012 GRC, the Commission (D. 13-05-010) adopted a 1% annual increase  
12 in average drive time per CSF work order, due to increasing traffic congestion. In D. 13-05-010,  
13 the Commission states:

14 Next, we address DRA's recommendation to reduce SoCalGas' costs by \$1.245  
15 million due to SoCalGas' proposal to increase drive time by 1%. We do not agree  
16 with DRA's recommendation that SoCalGas' proposal to increase customer service  
17 field drive time by 1% should be eliminated. The evidence demonstrates that in  
18 2009 the drive time was 10.4 minutes, while in 2010 drive time was 11.1 minutes.  
19 Therefore, we do not adopt DRA's recommendation to eliminate SoCalGas'  
20 proposal to increase the customer service field drive time by 1%.

21 The rationale for yearly increased drive time due to increased traffic congestion is the  
22 same in the current GRC as it was in the 2012 GRC, i.e., actual average drive time per order  
23 increased each year, from 10.4 minutes in 2009 to 11.5 minutes in 2013.<sup>66</sup>

24 SoCalGas calculated costs associated with increased drive time by comparing the results  
25 of SoCalGas' TY 2016 forecasting model (Ex. SCG-10-WP, page 17-27) using both 2013 actual  
26 and TY 2016 forecasted average drive time per order, with the difference reflecting the  
27 incremental cost of the increase in drive time. SoCalGas demonstrated this calculation in detail in  
28 Ex. SCG-10-WP, pages 222-223.

29 ORA supports SoCalGas' estimate of incremental drive time in terms of average minutes  
30 per order. ORA does not provide an order volume forecast for TY 2016 in terms of the number of  
31 work orders to which the incremental drive time needs to be applied. ORA does not present in its  
32 testimony any objection to the blended wage rate SoCalGas used throughout its testimony to

<sup>65</sup> Ex. ORA-13 (page 52, lines 13-14).

<sup>66</sup> Ex. SCG-10, page SAF 12, Table SAF-8.



1 calculate hourly costs associated with field technicians performing work. ORA provides  
2 absolutely no basis for dividing by three SoCalGas' forecast of incremental costs associated with  
3 increased drive time.

4 ORA's recommendation to allow only one-third of 1% for incremental drive time, due to  
5 increased traffic congestion, is completely unsubstantiated given that actual average drive time  
6 per order has increased by 10% from 2009-2013. Therefore, ORA's proposal must be rejected.

7 Second, ORA states,

8 *Although SCG specifically calculated additional funding for drive*  
9 *time costs in the TY, SCG's testimony and workpapers did not*  
10 *identify or include any historical costs incurred by its employees*  
11 *for drive time per CSF order for review and analysis. SCG states*  
12 *that its average drive time increased by 10% from 2009 to 2013,*  
13 *but SCG did not provide any associated and verifiable cost data*  
14 *to support additional funding over recorded expense levels. (Ex.*  
15 *ORA-13, page 52, line 22, and page 53, lines 1-5).*

16 SoCalGas has not historically captured or tracked costs at the granular level that ORA  
17 suggests is needed to forecast costs associated with drive time. However, the information needed  
18 to forecast TY 2016 costs associated with incremental drive time, e.g., the number of incremental  
19 minutes per order, the number of orders, and the field technician wage rate, were provided in  
20 SoCalGas' workpapers and made available in the CSF Excel model provided to ORA.<sup>67</sup> ORA  
21 indicated in its testimony that it supports the incremental drive time (minutes per order) SoCalGas  
22 forecasted.<sup>68</sup> ORA did not propose an alternative total order volume forecast associated with its  
23 use of 2009-2014 average historical costs as the basis for its TY 2016 total CSF Operations cost  
24 forecast, but ORA could have used SoCalGas' TY 2016 order volumes to calculate the drive time  
25 cost impact. ORA did not raise any objections to the blended wage rate SoCalGas used to  
26 calculate the cost of field technicians performing work (including driving to and from customer  
27 premises to complete work orders). For the aforementioned reasons, there is no basis to divide  
28 SoCalGas' incremental drive time forecast by three, as ORA proposes.

29 Third, ORA states,

30 *The lack of supporting data is problematic and prevents ORA and the*  
31 *Commission from being able to review historical cost data for drive time*  
32 *activities and independently calculate the incremental costs required for*

---

<sup>67</sup> Ex. SCG-10-WP, pages 17-27.

<sup>68</sup> Ex. ORA-13, page 52, line 13-14.

1 *the projected 1% increase over SCG's 2013 recorded levels. (Ex. ORA-*  
2 *13, page 53, lines 10-13)*

3 *SCG did not provide historical drive time per order data in "any" format*  
4 *for review and analysis. SCG's ratepayers should not be required to*  
5 *provide additional funding for activities that SCG is unable to provide*  
6 *historical costs data for review and analysis (Ex. ORA-13, pages 54,*  
7 *lines 2-5).*

8 The Commission adopted in D. 13-05-010 an increase in average drive time per order  
9 absent any historical cost data which ORA asserts is needed. To avoid repetitiveness, the same  
10 rationale SoCalGas has previously provided in rebuttal above would apply to this assertion. For  
11 the same reasons noted above, ORA's assertion must be rejected.

12 Fourth, ORA states,

13 *SCG's adjusted-recorded expenses (2009-2013) for its CSF Operations*  
14 *include overtime costs and costs incurred for one-time, non-recurring*  
15 *and unusual expenses (expenses incurred that are not necessary or*  
16 *required to operate the utility business) that SCG can reallocate in the*  
17 *TY for proposed activities. (Ex. ORA-13, page 54, footnote 147)*

18 Overtime costs are typically incurred in accordance with terms set forth in the collective  
19 bargaining agreement (e.g., working on a holiday) and when field technicians are called upon to  
20 respond to emergencies, to handle peak order volumes during the winter heating season, to  
21 complete work orders in progress that extend beyond the end of a field technician's scheduled  
22 shift and to travel to and from training conducted at SoCalGas' Pico Rivera training facility,  
23 depending on where a field technician's normal assigned work location is located. ORA  
24 provides absolutely no basis in its testimony for reallocating recurring overtime costs to cover  
25 incremental drive time resulting from increased traffic congestion. In fact, doing so, would  
26 likely cause delays in responding to emergencies, require a second trip to customer premises to  
27 complete work orders that extend beyond the end of a technician's shift, and other undesirable,  
28 likely more costly consequences. While overtime costs fluctuate from year to year, due to the  
29 unpredictability of emergency incidents and precise timing of peak winter heating season  
30 demands, for example, there is no discretionary overtime to be reallocated.

1 As provided in response to an ORA data request,<sup>69</sup> total annual overtime costs incurred  
2 within the CSF Operations cost category are shown in Table SAF-9 below.

3 **TABLE SAF-9**

4 **CSF Operations – Overtime Costs**

<b>2013 Constant Dollars (\$000)</b>	
<b>Year</b>	<b>Cost</b>
2009	13,734
2010	16,236
2011	16,017
2012	12,369
2013	14,613

5 The five-year average (2009-2013) overtime cost is \$14.594 million, with two years  
6 falling below the average and three years falling above the average. There are no non-recurring  
7 overtime costs to reallocate because the years in which costs are less than the five-year average  
8 are offset by the years in which costs are greater than the five-year average. The impact of  
9 overtime is embedded in the blended wage rate SoCalGas used in its forecasting model, which is  
10 based on the five-year average straight-time-to-overtime ratio.

11 Lastly, as set forth previously, SoCalGas does not have any non-recurring CSF  
12 Operations costs as ORA suggests, nor has ORA quantified any such costs. For all of the  
13 aforementioned reasons, ORA's assertion must be rejected.

14 **d. New Services for Customers – Expanded Appliance Safety**  
15 **Checks, Enhanced Customer Education and Outreach Safety**  
16 **Checks**

17 ORA states,

18 *ORA recommends incremental funding of \$1.738 million over 2013*  
19 *recorded expense levels. SCG's adjusted-recorded expenses (2009-*  
20 *2013) for its CSF Operations include overtime costs that SCG can*  
21 *reallocate in the TY for proposed activities. (Ex. ORA-13, page 54, lines*  
22 *11-12 and footnote 149)*

---

<sup>69</sup> A copy of ORA's data request (ORA-SCG-052-TLG, Q. 5.) and SoCalGas' response are provided in Appendix C.

1 In its testimony, SoCalGas requests \$1.337 million in incremental TY 2016 funding for  
2 expanded appliance safety checks while at customer premises.<sup>70</sup> SoCalGas also requests \$1.367  
3 million in incremental TY 2016 funding for field technicians to spend an additional 1.5 minutes  
4 while at customer premises (for entered orders where the customer is present) to educate  
5 customers on the legal requirement and importance of installing carbon dioxide (“CO”)  
6 detectors,<sup>71</sup> as well as demonstrate to customers (using the technicians’ new wireless mobile data  
7 terminal and internet access capability that was rolled out in 2013-2014) the types of safety and  
8 other information and programs available to customers on SoCalGas’ website (socalgas.com).<sup>72</sup>  
9 Lastly, SoCalGas requests \$2.509 million in incremental TY 2016 funding for field technicians  
10 to perform outreach safety checks for 50,000 customers per year of the approximate 2.4 million  
11 customers who have not utilized SoCalGas’ CSF services in at least the last seven years.<sup>73</sup>

12 SoCalGas TY 2016 funding request for these three new services totals \$5.213 million.  
13 ORA arbitrarily divides this total amount by three to arrive at its proposed TY 2016 funding  
14 amount, without raising any objections about the merits of any of SoCalGas’ proposed new  
15 services nor the forecasting assumptions contained in SoCalGas’ testimony and workpapers.  
16 ORA’s proposed level of funding is a combined aggregate level of proposed TY 2016 funding  
17 for all three new services. ORA does not provide recommended funding levels for each of the  
18 three new services individually.

19 Reallocating overtime costs to make up the difference, as ORA proposes, is not feasible  
20 for the reasons previously discussed above. In addition, ORA has not indicated a specific  
21 amount of overtime funding it believes should be reallocated away from emergency response, for  
22 example, for these new services or any of the other activities for which ORA recommends using  
23 overtime funding. If SoCalGas were to reallocate overtime funding to all the activities for which  
24 ORA recommends using overtime funding, overtime funding would largely be depleted, leaving  
25 little to no ability to respond to emergencies, honor collective bargaining agreement obligations  
26 or manage customer service requests during the peak winter heating season.

---

<sup>70</sup> This new service is described on pages SAF-15-16 of Ex. SCG-10.

<sup>71</sup> Senate Bill (“SB”) 183 requires customers to install CO detectors in all inhabited residences. The effective date of SB 183 is January 1, 2011 for new construction, July 1, 2011 for existing single family dwellings and January 1, 2013 for multi-family dwellings and buildings such as apartments and hotels (Ex. SCG-10, page SAF-8, footnote 9).

<sup>72</sup> Ex. SCG-10, pages SAF-16-17, and lines 7-26 and lines 1-2, respectively.

<sup>73</sup> Exs. SCG-10, page SAF-17, lines 4-18; SCG-10-WP, page 18.

1           Second, ORA states, “*ORA recommends that the Commission direct SCG to plan, develop*  
2 *and implement customer pilot programs in the TY to track the interest/requests made by*  
3 *customers and the related costs incurred on SCG’s proposed new customer offers/options.*” (Ex.  
4 *ORA-13, page 54, lines 12-15)*

5           ORA proposes that SoCalGas be required to implement pilot programs, without sufficient  
6 funding to do so. Without the necessary funding, SoCalGas would not be able to implement  
7 such programs. It is not clear if ORA is proposing that pilots be conducted for all three new  
8 services and, if so, what scope and funding level ORA is recommending for each of the three  
9 pilots.

10           Costs associated with conducting customer outreach safety checks, as SoCalGas proposes  
11 (for customers who have not used SoCalGas CSF services in at least the past seven years),  
12 include not only the \$2.509 million TY 2016 cost sponsored by witness Sara Franke (Ex. SCG-  
13 10, page SAF-17), but also \$0.169 million in labor costs sponsored by witness Evan Goldman  
14 (Ex. SCG-11, page EDG-18) and \$0.200 million in non-labor costs (to mail postcards to such  
15 customers) sponsored by witness Ann Ayres (Ex. SCG-12, page ADA-59).<sup>74</sup> Costs associated  
16 with educating customers about the importance of installing CO detectors include not only the  
17 \$1.367 million contained in Ex. SCG-10, pages SAF-16-17, but also \$0.092 million in non-labor  
18 costs sponsored by witness Ann Ayres (Ex. SCG-12, page ADA-59).

19           If the Commission orders SoCalGas to conduct pilot programs for SoCalGas’ proposed  
20 customer outreach safety checks (for customers who have not utilized SoCalGas CSF services  
21 for at least the past seven years) and expanded appliance safety checks (while already on  
22 customer premises), the Commission must approve the required funding associated with offering  
23 these new services to customers, even in a pilot program.<sup>75</sup> Similarly, if the Commission  
24 requires field technicians to spend an additional 1.5 minutes on customer premises, to educate  
25 customers on the importance of installing CO detectors and demonstrating safety and other

---

<sup>74</sup> Witness Ann Ayres (Ex. SCG-12, page ADA-59) sponsors costs associated with mailing postcards to customers explaining this service. Witness Evan Goldman (Ex. SCG-11, page EDG-18) sponsors costs associated with responding to customer calls from customers responding to the postcard mailing to schedule such service.

<sup>75</sup> Although ORA does not describe or define the scope of a “pilot program”, SoCalGas infers that a pilot program is more limited in scope and scale than a program offered to all customers. Therefore, a pilot program would target a smaller population than the total customer base. Moreover, incremental GRC funding would be needed to properly administer, manage and assess the pilot program(s).

1 information available on SoCalGas' website, as SoCalGas proposes to do while on customer  
2 premises, SoCalGas would need to be provided with the incremental funding necessary to  
3 provide this new service. ORA provides no basis for its proposed funding level, other than it  
4 again divided SoCalGas' TY 2016 funding request by three.

5 To the extent SoCalGas' request for incremental funding is authorized in this rate case,  
6 SoCalGas is certainly willing to report in its next rate case, the results of these three new  
7 programs.<sup>76</sup>

8 Third, ORA states,

9 *SCG identified 42% of its customers that have not requested service from its field*  
10 *technicians in seven years. One reason for this 42% rate could be that the*  
11 *customers only call SCG when they need or want service. SCG's historical*  
12 *expenses already include embedded costs for performing customer appliance*  
13 *safety checks and for various resources to educate customers on different SCG*  
14 *programs. (Ex. ORA-13, page 54, lines 15-20)*

15 As set forth in Ex. SCG-10 (pages SAF-15-17), contrary to ORA's assertion, the services  
16 SoCalGas is proposing are new and incremental; there are no historical embedded costs as ORA  
17 suggests. For example, with respect to the outreach safety checks SoCalGas is proposing, there  
18 are no historical embedded costs for customers who have not used SoCalGas' CSF services for  
19 the past seven years. SoCalGas does not incur any CSF costs for such customers.

20 Similarly, SoCalGas field technicians have not yet begun spending an additional 1.5  
21 minutes with customers, while on premises, as SoCalGas proposes, to educate customers on the  
22 need for CO detectors, as well as demonstrate using their new mobile data terminals ("MDTs")  
23 the types of safety, program and other information available to customers on SoCalGas' website.  
24 SB 183, the law requiring CO detectors, was just recently enacted.<sup>77</sup> And SoCalGas' field  
25 technicians have not historically had access to the Internet in the field. Therefore there are no  
26 historical embedded costs as ORA suggests.

---

<sup>76</sup> Tracking and reporting would be completed within any current system constraints as SoCalGas has not requested incremental funding to make any system changes associated with these two proposed new services.

<sup>77</sup> SB 183 requires customers to install CO detectors in all inhabited residences. The effective date of SB 183 is January 1, 2011 for new construction, July 1, 2011 for existing single family dwellings and January 1, 2013 for multi-family dwellings and buildings such as apartments and hotels (Ex. SCG-10, page SAF-8, footnote 9).

1           Lastly, SoCalGas' historical average on premise time per work order does not include  
2 costs associated with checking all of the customers' gas appliances while on premise except in  
3 cases where a customer specifically requests that all appliances be checked, which is the  
4 exception rather than the rule. Regardless, in the latter case, the requested incremental funding  
5 would enable all of the customer's appliances to be checked for a greater number of customers.

6           Nowhere in its testimony has ORA demonstrated or proven that the three proposed  
7 services are existing services embedded in historical recorded expenses. As reflected in  
8 SoCalGas' response to ORA-DR-SCG-052-TLG (Qs. 22a., c., e.-i.), there is a big difference  
9 between reactively providing these services when a particular customer requests them versus  
10 proactively offering these services to customers. The latter approach, as SoCalGas is proposing,  
11 is clearly incremental, contrary to ORA's assertion.

12           Fourth, ORA states, "*Before ratepayers are burdened with additional costs for activities*  
13 *that have associated costs embedded in historical expenses, SCG should conduct pilot programs.*"  
14 (*Ex. ORA-13, page 56, lines 33-35*)

15           ORA does not object to any of the merits of providing SoCalGas' proposed three new  
16 services for customers. Nor does ORA provide any basis or substantiation for its assertions that  
17 costs are already embedded in historical expenses and that SoCalGas' total funding request for  
18 the three new services should be divided by three. To the extent SoCalGas' request for  
19 incremental funding is authorized in this rate case, SoCalGas is certainly willing to report in its  
20 next rate case, the results of the three new service offerings.

21           Lastly, ORA states,

22           *Implementing a pilot program will assist SCG in tracking customers'*  
23 *interest and related costs so that more specific details can be provided*  
24 *to the Commission for review and analysis. In SCG's next GRC, SCG*  
25 *should be ordered to provide specific details on the total number of*  
26 *customers that requested each of the expanded/enhanced services*  
27 *included in the pilot program, specific details on the extra premise time,*  
28 *details on all incurred costs, supporting documentation on all identified*  
29 *and resolved problems with the pilot program, and a completed survey*  
30 *determining why 42% of its customers have not requested service from*  
31 *its technicians in seven years. (Ex. ORA-13, page 56, lines 33-37, and*  
32 *page 57, lines 1-7)*

33           To the extent SoCalGas' request for incremental funding is authorized in this rate case,  
34 SoCalGas is willing to report in its next rate case, the results of the three new service offerings.

1 SoCalGas has not included in its funding request any additional costs for technology or system  
2 changes that may be needed to support new reporting requirements, but SoCalGas will report in  
3 its next GRC in a manner that is consistent with current reporting capabilities. Similarly,  
4 SoCalGas has not included in its TY 2016 funding request the cost of the survey that ORA  
5 proposes SoCalGas be required to conduct. To the extent SoCalGas is required to conduct a  
6 survey of its approximately 2.4 million customers who have not utilized SoCalGas' CSF services  
7 in the past seven years, additional funding for such survey would be required.

8 Other than arbitrarily dividing SoCalGas' funding request by three, as ORA does for  
9 many of SoCalGas' TY 2016 funding requests, ORA provides no details or substantiation to  
10 support its proposed reduction in funding for these new services. ORA has not provided any  
11 details or estimates of the costs to conduct each of the three pilot programs ORA is  
12 recommending, nor has ORA estimated costs for the survey it is proposing SoCalGas be required  
13 to conduct.

14 **e. Refresher Training**

15 ORA supports SoCalGas' request for \$0.447 million in incremental TY 2016 funding for  
16 field technician refresher training.<sup>78</sup>

17 **f. Job Shadowing/Retiree Knowledge Transfer**

18 ORA states,

19 *ORA takes issue with SCG's forecast for incremental funding of \$0.398*  
20 *million (\$1.194 million over three years) for its Job Shadowing proposal*  
21 *and recommends that its request for incremental funding be denied.*  
22 *SCG's job shadowing program is a mentoring program. (Ex. ORA-13,*  
23 *page 58, lines 1-4)*

24 The number of residential field technicians who retired in 2013 nearly doubled compared  
25 to the number of retirements in 2009.<sup>79</sup> SoCalGas does not have an established process for  
26 capturing and passing on to less experienced field technicians the knowledge and skills of retiring  
27 technicians before they leave the company. SoCalGas recognizes that a formal knowledge  
28 transfer process would improve its overall training of new field technicians and requests \$0.398  
29 million for this purpose. For the last 60 days before they leave the company, retiring technicians

---

<sup>78</sup> Ex. ORA-13, page 57, lines 13-15.

<sup>79</sup> Ex. SCG-10, page SAF-18, Table SAF-12.



1 would accompany newer employees in the field, as part of the overall training provided to new  
2 field technicians.<sup>80</sup> ORA provides no basis for rejecting this proposed training other than alleging  
3 it is a “mentoring” program.

4 Second, ORA states, “*SCG’s shareholders can provide the incremental funding for SCG’s*  
5 *proposed mentoring program.*” (Ex. ORA-13, page 58, lines 4-5)

6 ORA does not object to the merits of SoCalGas’ proposed additional training for newer  
7 field technicians. ORA also provides no basis for suggesting that shareholders be required to fund  
8 SoCalGas’ use of experienced, retiring field technicians to augment SoCalGas’ existing training.  
9 SoCalGas is not aware of any instance where utility shareholders have been required to fund  
10 training for front-line CSF field technicians.

11 Third, ORA states,

12 *SCG is well aware that that every year there are employees that will be*  
13 *scheduled to retire. SCG should already have established procedures,*  
14 *prior to its TY 2016 GRC, to address employee retirements and*  
15 *knowledge transfer to staff that will perform the work left behind due to*  
16 *retirements in order to maintain system safety and reliability.* (Ex. ORA-  
17 *13, page 58, lines 5-9)*

18 The annual rate of field technician retirements nearly doubled in 2013 compared to  
19 2009.<sup>81</sup> The increased rate of retirements and resulting decline in field technician experience and  
20 job skill levels has heightened the need to develop the experience and skill level of the new  
21 workforce as quickly as possible. Contrary to ORA’s assertion, SoCalGas does not currently have  
22 a program in place for retiring employees to pass on their knowledge and experience to newer  
23 employees before they leave the company. SoCalGas’ proposal is intended to enhance the formal  
24 training employees receive at SoCalGas’ Pico Rivera training center, by providing additional “in-  
25 field” training for newer employees in order to accelerate their skill, working knowledge and  
26 experience development.

27 Fourth, ORA states, “*Assuming SCG promotes from within, replacements will come from*  
28 *pre-existing employees.*” (Ex. ORA-13, page 58, lines 9-10)

29 ORA is incorrect in implying that because SoCalGas promotes from the existing internal  
30 SoCalGas candidate pool that such candidates are trained and qualified to complete CSF work

---

<sup>80</sup> Ex. SCG-10, page SAF-18.

<sup>81</sup> Ex. SCG-10, page SAF-18, Table SAF-12.

1 orders. In accordance with the collective bargaining agreement between SoCalGas and the two  
2 unions on its property, replacements for residential field technician positions typically come from  
3 SoCalGas' advanced meter installer or part-time meter reader pool. When these employees enter  
4 field technician positions they typically have no experience working on gas appliances,  
5 diagnosing gas leaks, responding to emergency incidents or related experience. Completing  
6 SoCalGas' formal field technician training program at SoCalGas' Pico Rivera training center is  
7 mandatory for all employees who move to field technician positions, regardless of the prior  
8 position they held. ORA's proposed funding disallowance is based on a flawed, erroneous  
9 assumption and should therefore be rejected.

10 Fifth, ORA states, "*SCG has several training and re-certification programs for existing*  
11 *and newly hired employees, all funded by its ratepayers, to ensure that its employees are properly*  
12 *trained.*" (Ex. ORA-13, page 58, lines 11-13)

13 While SoCalGas has sound training programs for newly hired field technicians, no formal  
14 training program at a centralized training facility can replicate all the situations and equipment  
15 that experienced, retiring field technicians have encountered on the job, working in the field, over  
16 the years. Allowing experienced, retiring field technicians to transfer their knowledge and  
17 experience to newer employees before they leave is a needed enhancement to SoCalGas' current  
18 training programs given the limited skill/experience level of new entrants into the field technician  
19 classification.

20 Sixth, ORA states,

21 *SCG also has embedded funding from completed and eliminated*  
22 *projects, programs, and training as well as costs incurred for one-time*  
23 *non-recurring activities that SCG can reallocate funding from those*  
24 *activities in the TY for its proposed job shadowing program.* (Ex. ORA-  
25 *13, page 58, lines 13-16)*

26 ORA makes this assertion without providing any examples or facts to support its position.  
27 In an effort to seek clarification, SoCalGas sent a data request to ORA asking the following  
28 question (SEU-ORA-DR-06, Question 6):<sup>82</sup>

29 At Exhibit ORA-13, page 58, lines 13-16, when referring to SoCalGas' request for  
30 incremental funding for the CSF cost categories, ORA states "SCG also has

---

<sup>82</sup> A copy of SoCalGas' data request, SEU-ORA-DR-06, Q.5 and Q.6., and ORA's responses to Questions 5 and 6, are provided in Appendix C.

1 embedded funding from completed and eliminated projects, programs... that SCG  
2 can reallocate funding from those activities in the TY..." Please indicate which  
3 specific completed or eliminated projects and programs ORA is referring to.

4 ORA responded to SoCalGas' data request solely as follows:

5 "See ORA's response to question Q.5."

6 ORA's response to question Q.5 pertains solely to SDG&E, with no reference whatsoever  
7 to SoCalGas. Specifically, ORA's response to Q.5 was as follows:

8 In regards to "which specific completed or eliminated projects ORA is referring to"  
9 see ORA's testimony pages 9-12. Note that SDG&E states that its CSF Operations  
10 costs "are primarily driven by work order volumes." SDG&E's total work order  
11 volumes declined by 406,493 between 2009-2013, from 725,946 in 2009 to 319,453  
12 in 2013. **ORA was not able to compare SDG&E's forecast project costs to past  
13 project costs or determine which projects have been completed or eliminated.  
14 ORA assumes that SDG&E has at least completed some projects successfully  
15 and that those costs can be reallocated to fund new activities. [emphasis added]**  
16 SDG&E's testimony and workpapers did not include any historical cost data  
17 associated with each of its fifty-six work order types for analysis.

18 As reflected in ORA's response, ORA was nonresponsive to the question that was asked.

19 Furthermore, the fact that ORA makes an *assumption* regarding projects does not make it so.

20 ORA does not provide any basis for its assertion, nor does ORA identify any specific costs it

21 proposes to reallocate. Contrary to ORA's assertion, the CSF Operations cost category is

22 focused on completing customer- and company-generated work orders at customer premises, not

23 completing projects. Contrary to ORA's assumption, there are no project costs that can be

24 reallocated.

25 Forecasted TY 2016 expenses are based on the five-year average training cost. Like  
26 overtime costs, there are no non-recurring training costs; years for which training costs are under  
27 the five-year average are offset by years for which training costs exceed the five-year average.

28 ORA's assertion regarding "one-time, non-recurring costs" has been addressed previously and  
29 will not be repeated here in the interest of brevity.

30 For the aforementioned reasons, ORA's assertion should be rejected.

31 **g. Operator Qualification Training**

32 ORA states,

33 *ORA takes issue with SCG's forecast of \$0.738 million (\$2.214 million*  
34 *over three years) for Operator Qualification Training. SCG's historical*

1 *expenses (2009-2013) include expenses incurred for its operator*  
2 *qualification re-certification training for its CSF technicians. (Ex.*  
3 *ORA-13, page 57, lines 16-19)*

4 Historical costs for Operator Qualification (“OPQual”) training are those associated with  
5 conducting OpQual training every five years, not every three years as SoCalGas proposes.  
6 Conducting OpQual training more frequently, i.e., every three years instead of every five years,  
7 increases costs. In addition, there are incremental costs associated with adding new OpQual  
8 training elements/increasing the time spent on existing elements, as reflected in SoCalGas’  
9 workpapers,<sup>83</sup> as well as completing the new/expanded training elements also on a three-year  
10 cycle. ORA has not raised any specific objections regarding the new OpQual elements/increased  
11 time spent on each element or the increased frequency of OpQual training and recertification.  
12 Rather, ORA arbitrarily divides SoCalGas’ TY 2016 funding request by three again. ORA  
13 provides no rationale for its recommendation to fund only one-third of the CSF workforce  
14 receiving the more frequent and expanded OpQual training.

15 Second, ORA states, “*SCG’s testimony does not discuss if its proposed change in re-*  
16 *certification from a five year cycle to every three years is a mandated change.*” (Ex. ORA-13,  
17 *page 57, footnote 155)*

18 As stated in Ex. SCG-10 (page 19, lines 4-6), rationale for the increased frequency of  
19 OpQual training is sponsored by SoCalGas witness Frank Ayala (Ex. SCG-04). A copy of the  
20 relevant section of witness Ayala’s testimony was also provided as an attachment to Ex. SCG-10  
21 (page SAF-G-4-7). Ex. SCG-10 contains only the costs associated with the increased frequency  
22 and new/expanded OpQual training elements.

23 Third, ORA states, “*SCG’s testimony and workpapers do not discuss or show the amount*  
24 *of embedded historical costs for its on-going re-certification program.*” (Ex. ORA-13, page 57,  
25 *lines 20-22)*

26 Historical costs are not tracked at the level of detail required to provide the information  
27 ORA is suggesting is needed. However, embedded historical costs reflect a five-year OpQual  
28 training cycle, not a three-year cycle as SoCalGas is proposing. In addition, historical costs do  
29 not include new/expanded training elements SoCalGas is proposing to add as reflected in

---

<sup>83</sup> Ex. SCG-10-WP, pages 85-87.

1 SoCalGas' workpapers.<sup>84</sup>

2 Fourth, ORA states, "*ORA's estimate provides additional funding of \$0.246 million to*  
3 *address SCG's proposed increase in frequency for re-certification.*" (Ex. ORA-13, page 57,  
4 *footnote 156*)

5 ORA arbitrarily divides SoCalGas' TY 2016 funding request of \$0.738 million by three to  
6 arrive at its recommended TY 2016 funding level of \$0.246 million for increased frequency of  
7 OpQual training for CSF field technicians. ORA provides no justification for dividing SoCalGas'  
8 proposed funding level by three, nor does ORA demonstrate that its level of proposed funding  
9 would be sufficient to cover the incremental cost of both the increased frequency of OpQual  
10 training plus the new/expanded training elements. ORA's recommendation implies that only one-  
11 third of SoCalGas' field technicians would be eligible for the OpQual training and all others  
12 would be required to forgo the training. ORA provides no specificity around how the eligible  
13 employees would be selected or why only one-third of SoCalGas' field technicians should receive  
14 the more frequent and expanded training and recertification.

15 ORA is also inconsistent in its testimony regarding the treatment of OpQual training costs.  
16 In its testimony regarding OpQual training for SoCalGas CSF field technicians, ORA  
17 recommends allowing one-third of SoCalGas' incremental TY 2016 funding request for increased  
18 OpQual training frequency.<sup>85</sup> In its testimony regarding SDG&E CSF Operations, ORA  
19 recommends zero funding for expanded and increased frequency of OpQual training for CSF field  
20 technicians.<sup>86</sup> ORA provides no explanation or justification for these inconsistencies.

21 For all of the above-mentioned reasons, ORA's proposed reduction in SoCalGas'  
22 incremental funding request for OpQual training for CSF field technicians should be rejected.

23 **h. New MSA Inspection Program**

24 ORA states, "*ORA normalized SCG's request and recommends incremental funding of*  
25 *\$1.633 million.*" (Ex. ORA-13, page 59, lines 4-5)

---

<sup>84</sup> Ex. SCG-10-WP, pages 85-87.

<sup>85</sup> Ex. ORA-13, page 57, footnote 156.

<sup>86</sup> Ex. ORA-13, page 10, lines 3-4. Note, ORA is silent on SDG&E's OpQual funding request; however, no incremental funding is included in ORA's proposed TY 2016 forecast for CSF Operations.

1 SoCalGas' testimony and workpapers provide detailed justification for SoCalGas' TY  
2 2016 funding request for Department of Transportation ("DOT") - required MSA inspections.<sup>87</sup>  
3 SoCalGas' TY 2016 funding request is incremental to funding approved in the Commission's  
4 AMI decision.<sup>88</sup> In summary, under the DOT Code of Federal Regulations ("CFR") (i.e., CFR  
5 192.481), SoCalGas is required to inspect every MSA every three calendar years and not to  
6 exceed 39 months. Meter readers have historically performed the required MSA inspections.  
7 However, Meter Reading costs and funding are eliminated as a result of the Commission's  
8 Advanced Metering Infrastructure decision (D.10-04-027). SoCalGas cannot reallocate Meter  
9 Reading funding for MSA inspections as ORA also suggests; AMI-related Meter Reading savings  
10 are already accounted for in customer rates.<sup>89</sup>

11 With Meter Reading being eliminated, SoCalGas must establish a new MSA inspection  
12 organization that will conduct the required MSA inspections going forward. Costs required for  
13 MSA inspection personnel are included in the CSF Operations cost category. Costs associated  
14 with MSA inspection supervisors and other related support positions are contained in other CSF  
15 cost categories addressed later in my testimony. While the focus of this particular section of my  
16 testimony is on the CSF Operations cost category, Table SAF-10 below summarizes SoCalGas'  
17 incremental TY 2016 funding requirements for the MSA Inspection Program across all CSF cost  
18 categories.  
19

---

<sup>87</sup> Exs. SCG-10, pages SAF-19-22, page 24 (lines 22-26), pages SAF-28-29, and SCG-10-WP, pages 78-82.

<sup>88</sup> The Commission's AMI decision (D.10-04-027) established average annual funding of \$0.773 million per year, for 2016 and 2017, for the ongoing MSA inspections that will be required post-AMI implementation. SoCalGas is requesting incremental funding above the authorized funding level adopted in Commission D.10-04-027, as summarized in Table SAF-10 below, because, upon further review, SoCalGas has identified additional costs associated with performing the required MSA inspections, post AMI implementation. Specifically, SoCalGas is requesting funding for 74 additional Field Service Assistant (MSA inspector) positions, beyond the 10 positions funded in D.10-04-027 in order to comply with the DOT regulations, for the reasons set forth on pages SAF-20-22 of Ex. SCG-10. In addition, SoCalGas is requesting funding for supervisors to oversee the MSA inspection employees, as well as other support positions described in Ex. SCG-10, pages SAF-24 and SAF-28-29.

<sup>89</sup> This is further explained by SoCalGas witness Rene Garcia, Ex. SCG-239, pages RFG-3-4.

1  
2  
3  
4  
  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

**TABLE SAF-10**  
**New MSA Inspection Program – All CSF Cost Categories**  
**Constant 2013 Dollars - \$000**

	SoCalGas' TY 2016 Forecast	ORA's TY 2016 Forecast
<b>CSF Operations Cost Category</b>		
MSA Inspection Personnel	4,899	1,633
<b>CSF Supervision Cost Category</b>		
MSA Inspection Supervisors	437	0
<b>CSF Dispatch Cost Category</b>		
	0	0
<b>CSF Support Cost Category</b>		
MSA Inspection Program Manager	130	0
Meter Access Clerks	278	0
Quality Assurance Inspector	90	0
Technical Specialist (to manage inspection routes and MDTs)	91	0
Can't Get In ("CGI") Tags	12	0
<b>Total<sup>90</sup></b>	<b>5,937</b>	<b>1,633</b>

SoCalGas' forecast of the TY 2016 cost to continue MSA inspections in the absence of Meter Reading is an annual cost that will be incurred each year (i.e., to inspect one-third of SoCalGas' MSAs, or approximately 1.9 million MSAs, each year).

ORA does not present any objections to the specific assumptions upon which SoCalGas' TY 2016 forecast of \$4.899 million for the CSF Operations category (for MSA inspection personnel) is based. Like all the other funding requests ORA recommends dividing by three, ORA provides absolutely no justification for dividing SoCalGas' TY 2016 forecast of MSA inspection costs by three. ORA's funding proposal infers ORA wants SoCalGas to inspect only one-third of the meters the DOT requires SoCalGas to inspect, which would make SoCalGas non-compliant. Without adequate funding, SoCalGas will not be able to complete the approximate 1.9 million DOT-required MSA inspections each year.

---

<sup>90</sup> Total does not include costs sponsored by SoCalGas witness Evan Goldman (Ex. SCG-11, page EDG-18) for customer service representatives to respond to customer calls regarding MSA inspections, including scheduling inspections in cases where "CGI" tags are left at customer premises instructing them to call SoCalGas.

1           ORA further states, “*SCG calculated overtime costs in its forecast for the 74 positions.*”  
2 (*Ex. ORA-13, page 58, footnote 158*)

3           ORA’s assertion is incorrect. As reflected in SoCalGas’ workpapers regarding MSA  
4 inspections, SoCalGas’ TY 2016 forecasted cost for the 74 MSA inspection positions is based on  
5 straight-time wage rates only, with no overtime included.<sup>91</sup> That is, SoCalGas’ forecast assumes  
6 that all MSA inspections are completed during normal work shifts, not on overtime. SoCalGas  
7 recognizes from ORA’s assertion that SoCalGas did not adequately clarify in its data response  
8 that the blended wage rate (including overtime) was used to calculate labor costs for CSF field  
9 technicians but not MSA inspection personnel.

10           Third, ORA states,

11                   *SCG’s adjusted-recorded expenses (2009-2013) for its CSF Operations*  
12                   *include overtime costs that SCG did not incorporate into its TY forecast*  
13                   *for 74 additional positions. SCG can reallocate the costs incurred for*  
14                   *overtime in the TY for its proposed 74 CSF Field Service Assistant*  
15                   *positions. (Ex. ORA-13, page 59, lines 5-8)*

16           SoCalGas’ TY 2016 cost forecast for MSA inspections assumes that all inspections will  
17 be completed on straight-time and that no overtime costs will be incurred for MSA inspections.<sup>92</sup>

18           Overtime costs are typically incurred when CSF field technicians work on holidays, are  
19 called upon to respond to emergencies, handle peak order volumes during the winter heating  
20 season, complete work orders in progress that extend beyond the end of a field technician’s  
21 scheduled shift and to travel to and from training conducted at SoCalGas’ Pico Rivera training  
22 facility, depending on where a field technician’s normal assigned work location is located. ORA  
23 provides absolutely no basis in its testimony for reallocating recurring overtime costs to cover  
24 costs required to conduct MSA inspections. In fact, as explained previously, doing so would  
25 likely cause delays in responding to emergencies, require a second trip to customer premises to  
26 complete work orders that extend beyond the end of a technician’s shift, and other undesirable,  
27 likely more costly consequences.

28           Furthermore, although ORA never specifies how much overtime funding it is proposing  
29 to reallocate to any given activity, ORA’s multiple suggestions throughout its testimony to  
30 reallocate overtime would yield a significant deficit in overtime funding. Overtime is a recurring

---

<sup>91</sup> Ex. SCG-10-WP, page 79, Row H.8.

<sup>92</sup> Ex. SCG-10-WP, page 79, Row H.8.



1 cost and there are no discretionary overtime costs that can be reallocated for other purposes as  
2 ORA suggests.

3 Fourth, ORA states,

4 *SCG's historical expenses include costs incurred for DOT-required*  
5 *MSA inspections. SCG's proposed TY 2016 activities appear to be*  
6 *activities that should already be incorporated into routine activities*  
7 *performed by SCG when meters are first installed and when DOT-*  
8 *required MSA inspections are performed. SCG's ratepayers should not*  
9 *be burdened with excessive or duplicate costs. (Ex. ORA-13, page 59,*  
10 *lines 14-18)*

11 As discussed above and in SoCalGas' testimony,<sup>93</sup> meter readers have historically  
12 performed the required MSA inspections. However, Meter Reading costs are treated as a benefit  
13 in the Commission's AMI decision (D.10-04-027). With the elimination of Meter Reading costs  
14 pursuant to D.10-04-027, and without the necessary replacement funding, SoCalGas would not be  
15 able to complete the required MSA inspections.

16 ORA did not take issue with any of the assumptions that provide the basis for the TY 2016  
17 cost forecasts contained in SoCalGas' testimony and workpapers regarding MSA inspections.  
18 Nor are there any duplicate costs as ORA suggests, given that Meter Reading costs are eliminated  
19 post AMI-implementation.

20 Fifth, ORA states,

21 *It is not clear from SCG's testimony if it currently has employees*  
22 *performing the proposed activities, or if SCG has been performing*  
23 *incomplete meter inspections during 2009-2013, but in the TY, it is*  
24 *proposing that this work be transitioned over to its FSAs. (Ex. ORA-*  
25 *13, page 60, lines 3-6)*

26 As described in SoCalGas' prepared direct testimony,<sup>94</sup> meter readers have historically  
27 conducted the required MSA inspections in conjunction with obtaining meter reads at customer  
28 facilities each month for billing purposes. However, SoCalGas' AMI implementation eliminates  
29 the need for meter readers. As advanced meters are deployed, meter readers are eliminated and  
30 the costs are treated as a benefit in the AMI balancing account ("AMIBA"). Therefore, Meter  
31 Reading funding does not exist to conduct the required MSA inspections post-AMI  
32 implementation.

---

<sup>93</sup> Ex. SCG-10, page SAF-19, lines 7-22.

<sup>94</sup> Ex. SCG-10, page SAF-19, lines 7-22.

1 As set forth in SoCalGas' testimony,<sup>95</sup> with an estimated 5.8 million connected meters in  
2 2016, SoCalGas will be required to inspect approximately 1.9 million MSAs per year. The first  
3 meter reading routes (and associated meter reader positions) were eliminated in 2013 as a result  
4 of AMI. Therefore, the first MSA inspections to be performed by new MSA inspection  
5 personnel will begin in 2016. Given the time required to ramp up, including hiring, training and  
6 leveling the workforce in order to complete the required number of inspections each year,  
7 SoCalGas plans to begin hiring and training MSA inspection personnel, and conducting MSA  
8 inspections, in 2015 such that SoCalGas is in a position to begin completing approximately 1.9  
9 million MSA inspections per year beginning in 2016.

10 Sixth, ORA states,

11 *SCG's TY 2016 forecast also includes incremental non-labor costs for*  
12 *"Can't Get In (CGI)" door tags that SCG's meter readers leave on the*  
13 *door of a customer when they are unable to gain access to a meter and*  
14 *associated employee laundry expenses. SCG's historical expenses*  
15 *(2009-2013) include embedded labor and non-labor costs for DOT MSA*  
16 *inspections, costs for CGI door tags, and for laundry; additional*  
17 *funding is not required. (Ex. ORA-13, page 60, lines 6-11)*

18 The embedded Meter Reading costs to which ORA refers are treated as a benefit and  
19 eliminated pursuant to the Commission's AMI decision (D.10-04-027). Therefore, no embedded  
20 Meter Reading costs will exist for the new MSA Inspection Program that will replace the  
21 inspections previously performed by meter readers.

22 Seventh, ORA states, *"SCG can reallocate some of its costs incurred for overtime towards*  
23 *its employees' laundry bills."* (Ex. ORA-13, page 60, lines 11-13)

24 SoCalGas field employees are required to wear company uniforms while working in the  
25 field, for their own safety and for the safety of the public. SoCalGas contracts with a third party  
26 vendor to provide and launder employee uniforms, consistent with the collective bargaining  
27 agreement that is in place between SoCalGas and the two unions on its property. For the same  
28 reasons already described previously, ORA's proposed reallocation of overtime costs to cover  
29 uniform-related expenses is not feasible and should be rejected.

30 Eighth, ORA states,

---

<sup>95</sup> Ex. SCG-10, pages SAF-19-22.

1 *SCG's testimony does not discuss why it is not able to*  
2 *incorporate/reallocate embedded costs associated with activities*  
3 *performed by its meter reader positions (that will be phased out and have*  
4 *historically performed DOT MSA inspections) to fund its FSAs that will*  
5 *take over the compliance work. (Ex. ORA-13, page 60, lines 14-18)*

6 As SoCalGas explained on pages SAF-19-22 of Ex. SCG-10, and in response to an ORA  
7 data request,<sup>96</sup> the Commission's AMI decision (D.10-04-027) eliminates Meter Reading funding  
8 in conjunction with SoCalGas' AMI implementation.

9 ORA did not present any objections to the forecast methodology or assumptions SoCalGas  
10 used to determine the incremental TY 2016 funding required for ongoing MSA inspections post-  
11 AMI implementation. Rather, ORA merely erroneously asserts that Meter Reading funding  
12 (which will not exist) can be used for this purpose.

13 Ninth, ORA states,

14 *SCG's Table SAF-14 on page SAF-21 shows twenty 'Inspection*  
15 *Elements' that meter readers perform during the DOT MSA Inspections.*  
16 *SCG's TY 2016 proposal includes six additional 'Inspection Elements'*  
17 *that its FSAs will perform, which appear to be activities that SCG should*  
18 *already be performing." (Ex. ORA-13, page 60, footnote 166)*

19 The additional inspection elements SoCalGas proposes to include are not specifically  
20 spelled out in CFR 192.481. However, because MSA inspections will occur only once every  
21 three years after monthly meter reader visits to each meter cease to exist, post-AMI  
22 implementation, SoCalGas believes it is prudent to conduct a more comprehensive inspection  
23 while at the meter. The proposed additional inspection elements are intended to enhance the  
24 inspections historically performed by meter readers.<sup>97</sup>

25 Lastly, ORA states,

26 *SCG's ratepayers should not be burdened with providing excessive*  
27 *funding in the TY for SCG proposed activities that have recorded*  
28 *historical costs that SCG is not able to identify or calculate. (Ex. ORA-*  
29 *13, page 61, lines 26-28)*

30 As explained in SoCalGas' testimony<sup>98</sup> and in responses to ORA data requests, the DOT-  
31 required MSA inspections were historically performed by meter readers in conjunction with

---

<sup>96</sup> SoCalGas' response to ORA-SCG-DR-052-TLG (Q.1.b.), attached in Appendix C.

<sup>97</sup> Ex. SCG-10, pages SAF-20-21.

<sup>98</sup> Ex. SCG-10, pages SAF-19-22.

1 reading customer meters each month for billing purposes. Meter readers did not historically  
2 capture and SoCalGas did not track separately the cost associated with reading a meter and the  
3 cost associated with observing and recording conditions found at the same meter. Regardless,  
4 Meter Reading costs are eliminated post-AMI implementation pursuant to the Commission's AM  
5 decision (D.10-04-027).

6 SoCalGas developed a zero-based forecast of what it will cost going forward to conduct  
7 the required MSA inspections beginning in 2016, absent the eliminated Meter Reading funding  
8 and incremental to funding already authorized in D.10-04-027 for the MSA inspections beginning  
9 in 2016. The assumptions SoCalGas relied on are set forth in detail in SoCalGas' workpapers and  
10 summarized in SoCalGas' testimony.<sup>99</sup> ORA did not raise any concerns or objections about any  
11 of the assumptions upon which SoCalGas TY 2016 forecast is based.

12 **i. Curb Meter Regulator Replacements**

13 ORA does not take issue with SoCalGas' request for \$0.177 million in incremental  
14 funding for curb meter regulator replacements.<sup>100</sup> (ORA's testimony is silent on this issue, but  
15 ORA's forecast of TY 2016 expenses appears to include SoCalGas' proposed funding level.)

16 **2. UCAN**

17 In its testimony (Ex. UCAN-Fulmer), UCAN makes the assertions reproduced below  
18 regarding SoCalGas' TY 2016 order volume forecasts for two CSF work order types ("Seasonal  
19 Off" and "Seasonal On" work orders), each of which will be addressed below.

20 UCAN states,

21 *Given the declining trend, it is more appropriate to base the forecast of*  
22 *future seasonal CSO volume on the most recent year of data, as Ms.*  
23 *Franke did for SoCalGas, than it is to employ a five-year average as*  
24 *was done for SDG&E; however it would be preferable still to use an*  
25 *alternate methodology that would capture the declining trend. (Ex.*  
26 *UCAN-Fulmer, page 100, lines 6-10)*

27 Ex. SCG-10-WP (pages 28-77) contains order volume graphs showing historical order  
28 volume patterns, as well as the basis for SoCalGas' TY 2016 order volume forecasts, for each of  
29 the 50 individual CSF work order types. The charts for the two order types to which UCAN

---

<sup>99</sup> Exs. SCG-10-WP, pages 78-82, and SCG-10, pages SAF-19-22.

<sup>100</sup> Ex. SCG-10, page SAF-22, lines 12-16

1 refers are replicated in Tables SAF-11 and 12 below, updated to include actual 2014 order volume  
 2 data.

3 **TABLE SAF-11**  
 4 **SoCalGas' TY 2016 Order Volume Forecast for "Seasonal Off" Work Orders**  
 5

<b>Source</b>	Customer Work	<b>Description:</b> This is where the customer requests service to have a heating appliance with a constant pilot or electronic ignition turned off at the control or line valve. A full safety check is performed on the heating appliance before closing the gas supply.	<b>Historical Averages</b>									
<b>Order Group</b>	CSO		5-Yr Avg	8,738								
<b>Order Type</b>	Seasonal Off		4-Yr Avg	8,268								
			3-Yr Avg	7,976								
Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	13,589	14,136	13,232	14,099	10,620	9,144	8,788	7,878	7,261	7,620		
Forecast		15,171	15,506	15,842		11,621	12,623	13,624		7,306	7,351	7,395

Year	Actual	Forecast
2005	13,589	
2006	14,136	15,171
2007	13,232	15,506
2008	14,099	15,842
2009	10,620	
2010	9,144	11,621
2011	8,788	12,623
2012	7,878	13,624
2013	7,261	
2014	7,620	7,306
2015		7,351
2016		7,395

**Forecasting Method:** Base Year (Orders to Active Meters)

Forecast method recognizes a declining trend. Factors outside the company's control, such as weather and customer comfort levels, may impact order volumes in the future.

6  
7

1 **TABLE SAF-12**

2 **SoCalGas' TY 2016 Order Volume Forecast for "Seasonal On" Work Orders**

<b>Source</b>	Customer Work	<b>Description:</b> This is where the customer requests a heating appliance to be turned on. A full safety check is performed on the heating appliance.										<b>Historical Averages</b>	
<b>Order Group</b>	CSO											5-Yr Avg	74,506
<b>Order Type</b>	Seasonal On											4-Yr Avg	70,505
												3-Yr Avg	68,918
Order Counts													
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
Actual	101,886	117,144	117,501	97,592	90,512	75,264	78,765	63,402	64,588	58,578			
Forecast		111,444	111,997	112,549		96,612	102,712	108,813		64,987	65,385	65,784	

Year	Actual	Forecast
2005	101,886	
2006	117,144	111,444
2007	117,501	111,997
2008	97,592	112,549
2009	90,512	
2010	75,264	96,612
2011	78,765	102,712
2012	63,402	108,813
2013	64,588	
2014	58,578	64,987
2015		65,385
2016		65,784

**Forecasting Method:** Base Year (Orders to Active Meters)

Forecast method recognizes a declining trend. Factors outside the company's control, such as weather and customer comfort levels, may impact order volumes in the future.

3  
4  
5 While the volume of "Seasonal Off" work orders increased in 2014 compared to 2013,  
6 SoCalGas recognizes the overall declining trend in historical order volumes for SoCalGas'  
7 "Seasonal Off" and "Seasonal On" work orders. Because these two order types are impacted by  
8 weather; the mix of wall furnaces (old and new, virtually all of which have gas pilots), floor  
9 furnaces, forced air units ("FAUs") and other space heating equipment used by customers; the  
10 state of the economy; energy prices and customer comfort levels; SoCalGas' use of BY 2013  
11 order volumes as the basis for its TY 2016 order volume forecast for these two order types is  
12 reasonable. The fact that the order volume for "Seasonal Off" work orders increased in 2014  
13 compared to 2013 reinforces the reasonableness of SoCalGas' forecast methodology.

1 UCAN further states,

2 *In order to correctly capture the declining trend in the data, the forecast*  
3 *should use an exponential trend analysis using the full set of historical*  
4 *data provided in the utilities' workpapers (2005-2013 data). Using this*  
5 *data, a more realistic forecast for both SDG&E and SoCalGas can be*  
6 *made that captures the historical decline seen in the data. Use of an*  
7 *exponential trend forecast would decrease the SDG&E and SoCalGas*  
8 *projections of Seasonal CSO work order volume. The results of the*  
9 *exponential forecast for SDG&E and SoCalGas are shown in Table 11*  
10 *and Table 12 below.<sup>101</sup> (Ex. UCAN-Fulmer, page 101-102 )*

11 *UCAN Table 12: Comparison of*  
12 *SoCalGas and UCAN forecasts for Seasonal CSO*  
13

<i>Seasonal Off</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>
<i>SoCalGas</i>	<i>7,306</i>	<i>7,351</i>	<i>7,395</i>
<i>UCAN</i>	<i>6,593</i>	<i>5,986</i>	<i>5,436</i>
	<i>-10%</i>	<i>-19%</i>	<i>-26%</i>
<i>Seasonal On</i>			
<i>SoCalGas</i>	<i>64,987</i>	<i>65,385</i>	<i>65,784</i>
<i>UCAN</i>	<i>59,486</i>	<i>54,786</i>	<i>50,458</i>
	<i>-8%</i>	<i>-16%</i>	<i>-23%</i>

14 Table SAF-13 below compares the percentage change in actual order volumes during each  
15 of the past three years versus the average annual percentage change in order volumes proposed by  
16 UCAN for the next three years, 2014-2016.

---

<sup>101</sup> UCAN's Table 11, comparing UCAN's forecast with that of SDG&E, is reproduced in the rebuttal testimony of SDG&E, Ex. SDG&E-213.

1  
2  
**TABLE SAF-13**

**Actual Versus Forecasted Order Volume Comparison – Percentage Change per Year**

	2011	2012	2013	2014	2015	2016
<b>“Seasonal Off” Orders</b>						
Percentage Change in Actual Order Volume Compared to Prior Year	-3.9%	-10.4%	-7.8%	+4.9%		
Average Annual Percentage Change in Actual Order Volumes	-7.4% (2011-2013)					
	-4.3% (2011-2014)					
SoCalGas’ Order Volume Forecast <sup>102</sup>				+0.6%	+0.6%	+0.6%
UCAN’s Order Volume Forecast				-9.2%	-21.4% <sup>103</sup>	-9.2%
Average Annual Percentage Change Based on UCAN’s Forecast				-13.3%		

<b>“Seasonal On” Orders</b>						
Percentage Change in Actual Order Volume Compared to Prior Year	+4.7%	-19.5%	+1.9%	-9.3%		
Average Annual Percentage Change in Actual Order Volumes	-4.3% (2011-2013)					
	-5.6% (2011-2014)					
SoCalGas’ Order Volume Forecast <sup>104</sup>				+0.6%	+11.6% <sup>105</sup>	+0.6%
Average Annual Percentage Change Based on SoCalGas’ Forecast				+4.3%		
UCAN’s Order Volume Forecast				-7.9%	-6.5% <sup>106</sup>	-7.9%
Average Annual Percentage Change Based on UCAN’s Forecast				-7.4%		

3 As reflected in Table SAF-13 above, for “Seasonal Off” orders, UCAN’s proposed  
4 forecast suggests an approximate doubling or tripling of the average annual percentage change in  
5 order volumes from 2014-2016 compared to the periods from 2011-2013 and 2011-2014,  
6 respectively. Similarly, for “Seasonal On” orders, UCAN’s proposed forecast suggests a 32% to  
7 72% increase in the average annual percentage change in order volumes from 2014-2016  
8 compared to the periods from 2011-2014 and 2011-2013, respectively. UCAN provides no basis  
9 for its assumption that the average annual percentage change in order volumes during the next

<sup>102</sup> Forecast accounts for projected meter growth, using the orders-per-active-meter forecasting methodology described earlier in this testimony.

<sup>103</sup> Forecasted 2015 order volume compared to actual 2014 order volume.

<sup>104</sup> Forecast accounts for projected meter growth, using the orders-per-active-meter forecasting methodology described earlier in this testimony.

<sup>105</sup> Forecasted 2015 order volume compared to actual 2014 order volume.

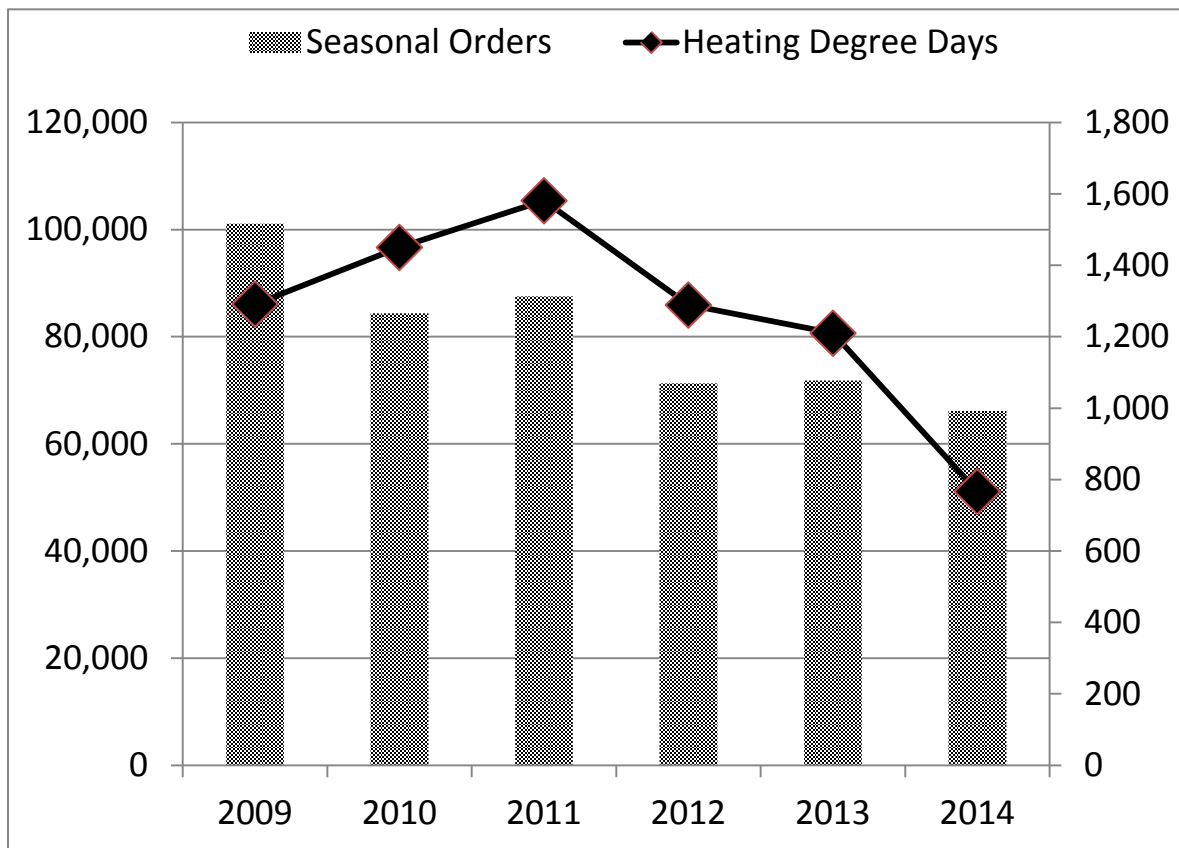
<sup>106</sup> Forecasted 2015 order volume compared to actual 2014 order volume.



1 three years will be significantly greater than it was during the last three years. For example,  
2 UCAN does not provide any evidence that customers who have older FAUs (with gas pilots) will  
3 replace those FAUs at a significantly faster pace during the next three years than they did during  
4 the last three years.

5 In addition, southern California is in its fourth year of severe drought conditions. A  
6 change in weather conditions, with cooler temperatures and greater precipitation, would likely  
7 increase seasonal order volumes, as there will continue to be customers who utilize wall furnaces,  
8 as well as customers who still have FAUs or other space heating equipment with gas pilots. As  
9 reflected in Table SAF-14 below, there is a strong correlation between weather (e.g., Heating  
10 Degree Days, or “HDD”) and seasonal order volumes. Seasonal order volumes have declined in  
11 large part due to milder weather/decline in HDDs from 2009 to 2014. As the number of HDDs  
12 increases going forward, there will likely be a corresponding increase in seasonal order volumes.

13 **TABLE SAF-14**  
14 **Correlation between Seasonal Order Volumes and Heating Degree Days**



15  
16

1 For the above-mentioned reasons, UCAN’s forecast methodology should be rejected.  
2 Given the impact of and variations in weather (over which SoCalGas has no control), a forecast  
3 that is based on BY 2013 order volumes for “Seasonal Off” and “Seasonal On” work orders, as  
4 SoCalGas proposed, is reasonable.

5 Lastly, UCAN states, *“There is no material difference in the drivers of Seasonal CSO*  
6 *work order volume for SDG&E and SoCalGas. It would be more appropriate to forecast work*  
7 *volumes using the same methodology both utilities.”* (Ex. UCAN-Fulmer, page 99, lines 18-20)

8 UCAN supports SDG&E’s use of a five-year average forecasting methodology for  
9 SDG&E’s seasonal order type, “Seasonal On Multiples”<sup>107</sup>, but UCAN proposes an alternative  
10 forecasting methodology for SoCalGas’ “Seasonal On” orders, which include both multi-family  
11 and single-family orders within a single order type. UCAN’s own testimony contradicts UCAN’s  
12 above assertion.

13 As reflected in the order volume charts for both SDG&E and SoCalGas (Ex SDG&E-13-  
14 WP, pages 42-44, and Ex. SCG-10-WP, pages 38-39, updated in Appendices A to include 2014  
15 data) the historical order volume patterns for SoCalGas and SDG&E are different for each of the  
16 seasonal order types.<sup>108</sup> Contrary to UCAN’s assertion, the historical order volume patterns do  
17 not suggest that the drivers impacting order volumes are identical between the two utilities.  
18 While drivers may fall into the same general categories, e.g., weather, customer appliance  
19 choices, the state of the economy and energy prices, they manifest themselves very differently in  
20 terms of the order volume patterns at each utility, as reflected in the above-referenced  
21 workpapers. Therefore, it would be inappropriate to apply the same forecast methodology across  
22 all seasonal order types for both SDG&E and SoCalGas. Rather, each order type forecast must be  
23 evaluated on its own merits.

24 Aside from the order volume forecasts for SoCalGas’ two seasonal order types (“Seasonal  
25 Off” and “Seasonal On”), UCAN did not take issue with, object to, or contest any other aspect of  
26 SoCalGas’ TY 2016 funding request for CSF Operations.

---

<sup>107</sup> In Ex. UCAN-Fulmer (page 102, footnote 210), UCAN states, “SDG&E presents two forecasts for Seasonal On CSOs, one for singles and one for multiples. I have adjusted the forecast only for singles because the multiples dataset does not show the declining trend seen in the other CSO datasets. It is therefore reasonable to use SDG&E’s forecast for “Seasonal On Multiples.”

<sup>108</sup> Seasonal order types for SoCalGas are “Seasonal Off” and “Seasonal On”. Seasonal order types for SDG&E are “Seasonal Off”, “Seasonal On Singles”, and “Seasonal On Multiples”.

1                   **3.    UWUA**

2                   UWUA supports SoCalGas’ TY 2016 funding request for CSF Operations.<sup>109</sup> In its  
3 testimony (Exs. UWUA-1, 2, 3, 9 and 10), UWUA makes the following additional statements  
4 and proposals, each of which will be addressed below:

5                   **a.       SoCalGas Response Times for A1 Gas Leak Orders**

6                   UWUA states,

7                   *Ms. Franke notes that there were 340,000 leak calls from customers in*  
8 *2013, over 102,000 emergency calls (A-1 calls) and 238,000 A-2 calls.*  
9 *The SoCalGas response time shows “missed window” on A-2 leak*  
10 *report response 10,730 times, about 30 per day, or 4.5%. However, the*  
11 *response window was expanded from two hours to four hours around*  
12 *the time of San Bruno, so an acceptably low percentage may reflect a*  
13 *reduced level of service quality (time for response in this case.) (Ex.*  
14 *UWUA-9, page 3, lines 14-20)*

15                  As described in Ex. SCG-10, page SAF-51 (lines 1-11), in 2010 SoCalGas revised the  
16 decision tree it uses to classify gas leaks and other emergency orders. Consequently, some A2  
17 orders were reclassified as A1 priority, and vice versa, with the net effect being an increase in  
18 orders classified as A1 priority. A1 orders have a 30-minute (or 45 minutes off hours) response  
19 window and A2 orders have a four-hour response window.<sup>110</sup>

20                  **b.       MSA Inspection Program**

21                  UWUA states,

22                  *Based on my experience in the field, an inspection with the detail*  
23 *required by the MSA program will require an average of 90 seconds to*  
24 *perform and record. The factors involved make an analogy to the*  
25 *meter read process very strained. As just one example, the requirement*  
26 *of inspection from all angles and at a close distance makes the access*  
27 *issues much more complicated for the inspector than they would be for*  
28 *the meter reader. Using 90 seconds in place of 60 seconds at line c2 of*  
29 *the calculation on page 78 would result in 60 FTEs, not 48 for the*  
30 *“regular” inspections and a total of 96 for the program. (Ex. UWUA-*  
31 *9, page 5, lines 7-15)*

---

<sup>109</sup> Ex. UWUA-9, page 3, lines 3-5.

<sup>110</sup> The response window for A2 orders was changed from two hours to four hours in 2006, in an effort to sync up SDG&E and SoCalGas emergency order categorization and response time windows.

1 Based on further analysis SoCalGas has completed since the time SoCalGas filed its TY  
2 2016 GRC Application, SoCalGas agrees with UWUA that the 96 positions will be needed to  
3 complete the MSA inspections, but for a different reason than UWUA proposes.<sup>111</sup> Based on  
4 additional analysis, SoCalGas has also concluded the work would require a lower pay rate. The  
5 cost of additional positions that will be required, at a lower pay rate, would be roughly equivalent  
6 to the cost of the positions SoCalGas forecasted using the field service assistant (“FSA”) pay  
7 level.

8 UWUA further states,

9 *This is not a time to cut corners on compliance; if my estimate (96 FSAs)*  
10 *is not approved and the Franke estimate (84 FSAs) is adopted, I suggest*  
11 *that the Commission review the program in a year and make*  
12 *adjustments, with funding to be adjusted as suggested by Carl Wood in*  
13 *his testimony. (Ex. UWUA-9, page 5, lines 19-23)*

14 SoCalGas does not support UWUA’s recommendation that MSA inspection costs be  
15 subject to annual review and upward adjustment. UWUA does not provide sufficient analysis to  
16 propose some form of balancing of MSA inspection costs, and SoCalGas does not endorse that  
17 approach in this GRC.

18 Third, UWUA states,

19 *These employees would be FSAs, Field Service Assistants, the entry*  
20 *level position for Customer Service Field. SoCalGas has included an*  
21 *appropriate level of support for FSA training; these inspectors will*  
22 *provide an important source of entry-level employees available for*  
23 *promotion within in the customer service job progression structure.*  
24 *This will save SoCalGas money in future training and efficiency as*  
25 *compared with hiring off the street into jobs with higher levels of*  
26 *required skill. (Ex. UWUA-9, page 5, lines 25-31)*

---

<sup>111</sup> SoCalGas’ TY 2016 forecast is based on the assumption that a uniform number of inspections will be conducted each month. However, because all MSAs must be inspected every three calendar years (and not to exceed 39 months), rather than on a rolling 36 months basis, SoCalGas has concluded it must compress twelve months of inspections into the period from January through October/early November, in order to allow ample time at the end of each year to resolve meter access issues associated with the inspections conducted late in the year. Meter access issues are likely to increase once meter readers are no longer reading meters on a monthly basis, and SoCalGas anticipates this timing adjustment is needed in order to meet the DOT’s “calendar year” requirement for 100% of the required inspections. Compressing the inspections into 10-11 months, rather than 12 months as SoCalGas envisioned when it prepared its TY 2016 forecast, results in the need for additional positions as UWUA suggests, but for the aforementioned reason and not the reason proposed by UWUA. As reflected in SoCalGas’ workpapers (Ex. SCG-10-WP, page 78), SoCalGas’ cost estimate was based on an average of 98 seconds per above ground MSA inspection.

1 While SoCalGas appreciates UWUA's interests, job classifications and job progressions  
2 are the subject of collective bargaining and are outside the scope of the GRC. SoCalGas used the  
3 FSA pay grade to forecast TY 2016 costs because "FSA" and "meter reader" are the two  
4 applicable job classifications that presently exist in the parties' collective bargaining agreement.  
5 While meter readers (lower pay grade than FSA) have historically performed the required MSA  
6 inspections, the additional inspection elements SoCalGas proposes to add would likely require a  
7 higher pay grade than the meter reader pay rate.

8 Fourth, UWUA states,

9 *I recommend two adjustment mechanisms, whose operation would be*  
10 *controlled by advisory committees made up of SoCalGas management,*  
11 *employees, public interest representatives and CPUC staff.... The other*  
12 *mechanism is intended to provide sufficient resources to launch and*  
13 *manage the new MSA inspection program under the uncertain*  
14 *conditions – differences of opinion about the number of employees*  
15 *needed to perform the inspections – described by UWUA Witness Mike*  
16 *Barber and SoCalGas Witness Franke. It would accompany a*  
17 *determination by the Commission to approve the lower estimate of*  
18 *needed employees to implement the MSA inspection program proposed*  
19 *by SoCalGas. It would provide for a review after one year and a*  
20 *revenue adjustment to provide additional resources if the review*  
21 *established that the larger employee complement was needed to*  
22 *complete the three-year inspection cycle. The revenue increment would*  
23 *be obtained through an advice letter. (Ex. UWUA-1, page 14, lines 18-*  
24 *20, and page 15, lines 11-20)*

25 For the reasons previously mentioned, SoCalGas does not agree with UWUA's  
26 recommendation.

27 Lastly, UWUA states,

28 *The MSA inspection is a new inspection program with a significant*  
29 *complement of new employees; it is mission critical in that it is a*  
30 *compliance matter addressing leak and abnormal condition discovery.*  
31 *The assumptions that feed the algorithm for estimating the required*  
32 *number of employees suggest that the program will be understaffed and*  
33 *therefore fail. On the matter of forecast assumptions reasonable people*  
34 *can disagree; UWUA witness Mike Barber will describe the basis for*  
35 *the disagreement and give UWUA's more grounded estimate.*  
36 *Reasonable people cannot disagree on the outcome: compliance with*  
37 *the inspection requirements and timing is required. On this issue*  
38 *UWUA suggests a working group to monitor and adjust if necessary*  
39 *through an advice letter, so that we able to achieve the outcome -*  
40 *compliance. (Ex. UWUA-1, page 9, lines 6-16)*

1 Responsibility for MSA inspections, which currently resides in SoCalGas' Meter  
2 Reading organization<sup>112</sup>, will be transferred to a new MSA inspection organization<sup>113</sup> as AMI is  
3 implemented and meter readers are no longer performing the MSA inspection function in  
4 conjunction with obtaining monthly meter reads for billing purposes.

5 SoCalGas does not perceive a need at this time for a working group, as UWUA proposes,  
6 as the Commission already has well-established processes for ensuring ongoing utility  
7 compliance with regulatory requirements. UWUA has not provided any substantiation, or cost  
8 estimates, for the formation of working groups, comprised of union leaders/employees,  
9 management, public interest groups and Commission staff, to monitor utility compliance with  
10 regulations. If such working groups were formed to monitor regulatory compliance, the  
11 Commission would need to revisit its current processes for ensuring utility compliance.

12 In addition, it would be premature to establish an advice letter revenue recovery  
13 mechanism, as UWUA proposes in the event SoCalGas does not establish 96 MSA inspection  
14 positions. SoCalGas is confident it will be able to continue fulfilling MSA inspection  
15 requirements provided the Commission approves SoCalGas' requested TY 2016 funding. Costs  
16 can be reviewed in SoCalGas' next GRC proceeding.

17 **c. Training, Mentoring, Job Shadowing**

18 UWUA witness Jami Simon (Ex. UWUA-10) advocates a comprehensive evaluation and  
19 update to employee training programs, including pre-hire preparation, curricula review,  
20 augmenting trainer skills, mentoring and coaching. UWUA proposes that each of these elements  
21 would mimic programs implemented elsewhere and administered by the UWUA's national  
22 Power for America Training Trust Fund. SoCalGas' responses to the specific  
23 assertions/recommendations contained in witness Simon's testimony in so far as they pertain to  
24 CSF and Meter Reading training are set forth below.

25 UWUA states, "*I recommend that SoCalGas commence training shortly after placement*  
26 *into the job.*" (Ex. ORA-10, page 7, lines 10-11)

27 In making this recommendation, UWUA witness Jami Simon may not be aware that CSF  
28 technicians and meter readers are not placed into the job until they successfully pass training.

---

<sup>112</sup> SoCalGas' Meter Reading organization will be eliminated as a result of AMI implementation.

<sup>113</sup> A dedicated MSA inspection organization is being established because the routing of MSA inspection work will be much like current meter reading routes, with inspection personnel completing assigned inspection routes each day.

1 Pursuant to the parties' collective bargaining agreement, employees remain in their current  
2 positions until training is available. If a training class is not immediately available, employees  
3 begin to receive the rate of pay for the new position after a set period of time; however, they do  
4 not move into or begin performing the new job until after they have successfully passed  
5 training.<sup>114</sup>

6 With respect to UWUA witness Simon's other recommendations, SoCalGas has proposed  
7 TY 2016 funding for several CSF training improvements of the nature UWUA describes,  
8 including:

- 9 • Refresher training for CSF technicians who remain in their positions for extended  
10 periods of time;<sup>115</sup>
- 11 • Two policy review and reinforcement instructors to ensure CSF policies and  
12 procedures are consistently interpreted and implemented across all 51 operating  
13 bases;<sup>116</sup>
- 14 • One CSF training modernization specialist to review and make improvements to  
15 current training curricula and videos;<sup>117</sup>
- 16 • Job shadowing funding to enable the transfer of expertise and experience from  
17 retiring CSF technicians in order to accelerate the proficiency of newer  
18 technicians;<sup>118</sup>
- 19 • Four commercial/industrial field instructors to supplement SoCalGas' residential  
20 field instructors who are already in place;<sup>119</sup> and
- 21 • Increased frequency of operator qualification training/certification.<sup>120</sup>

22 UWUA supports SoCalGas' above-mentioned funding requests for CSF training  
23 improvements.<sup>121</sup> Any potential role in training for UWUA and/or the UWUA's national Power  
24 for America Training Trust would be subject to collective bargaining and need to include in the  
25 discussion the other union on SoCalGas' property that also represents CSF and Meter Reading  
26 employees.

---

<sup>114</sup> Meter readers are typically hired externally and must successfully pass meter reader training in order to move into the position.

<sup>115</sup> Ex. SCG-10, page SAF-17 (lines 24-30), page 18 (lines 1-7), and page 30 (lines 1-10).

<sup>116</sup> Ex. SCG-10, page SAF-30, lines 11-21.

<sup>117</sup> Ex. SCG-10, page SAF-30, lines 22-29, and page 31, lines 1-2.

<sup>118</sup> Ex. SCG-10, page SAF-18, lines 8-25.

<sup>119</sup> Ex. SCG-10, page SAF-31, lines 3-30, and page 31, lines 1-5.

<sup>120</sup> Ex. SCG-10, page SAF-19, lines 1-6.

<sup>121</sup> Exs. UWUA-1, page 3, lines 16-18; UWUA-9, page 3, lines 3-5.

1                                   **d.     Other UWUA Proposals**

2                   UWUA states, “*With one exception – one-day turn-around for gas connection and*  
3 *reconnection orders (turn-ons) - UWUA is not suggesting aspirational standards and is not*  
4 *suggesting an employee increment to support standards.*” (Ex. UWUA-1, page 11, lines 18-21)

5                   Providing one-day reconnect service for customers who are disconnected for nonpayment  
6 of their gas bills, as well as for all other turn-on orders, as UWUA’s proposal implies, would  
7 mean that other order types would need to be given a lower priority in order to make room for  
8 turn-on/reconnect orders to be given one-day service. UWUA does not indicate which order  
9 types it proposes to move to lower priority.

10                  It should also be noted that customers who are moving and need their gas turned on at a  
11 new location typically know their move date and call ahead of time to schedule a turn-on order.  
12 It is unlikely such customers would want or expect one-day service.

13                  UWUA has not provided any substantiation, cost estimates, or implementation details to  
14 enable cost neutrality (e.g., reprioritization or elimination of other order types) associated with its  
15 proposal. Therefore, UWUA’s proposal should be rejected.

16                  UWUA also states, “*UWUA is making one recommendation in the customer service area:*  
17 *complete turn-on orders within one day and complete no hot water complaints and no heat in*  
18 *wintertime complaints in one day.*” (Ex. UWUA-9, page 6, lines 5-7)

19                  Water heating work orders are currently completed within a day (or the following day if  
20 customer requests for water heater service are received late in the day). With respect to customer  
21 space heating appliances, it is not clear whether UWUA’s “no heat in wintertime” proposal  
22 would include one-day service for pilot lighting. UWUA has not defined “wintertime” or  
23 provided any cost estimates associated with its proposal. Nor has UWUA identified other order  
24 types it proposes to eliminate or move to a lower priority in order to make room for one-day  
25 service for space heating appliances in order to maintain cost neutrality as UWUA suggests is  
26 possible.

27                  In preparation for each winter season, SoCalGas encourages customers to call ahead to  
28 schedule seasonal pilot lights in advance of the busy season. It would be very costly, if not  
29 impossible, to provide one-day service for customers who wait until the last minute to call to  
30 schedule gas pilot lighting service.



1           Lastly, the proposal of UWUA witness Mike Barber conflicts with the testimony of  
2 UWUA witness Carl Wood, wherein witness Wood seeks “one-day service” for turn-  
3 on/reconnect orders, not other order types.

4           For the aforementioned reasons, UWUA’s proposal should be rejected.

5           Lastly, UWUA states,

6                     *The RESO program as described by Robin Downs applies to transmission*  
7                     *operation, maintenance and construction employees; he recommends two RESO*  
8                     *positions for transmission. The program should be structured to include*  
9                     *distribution and customer service workers so that all employees who touch pipe*  
10                    *directly or indirectly have access to a RESO. I estimate that this would involve*  
11                    *adding an additional five RESO positions, for a total of seven. This would reflect*  
12                    *the vast geographic size and diversity of the SoCalGas service territory; the large*  
13                    *number of employees affected; the diversity of operating and maintenance issues*  
14                    *that arise in distribution and customer service field worksites. (Ex. UWUA-2,*  
15                    *page 8, lines 21-29)*

16           UWUA’s proposal to establish a Represented Employee Safety Officer (“RESO”)  
17 program, including CSF, is addressed in the rebuttal testimony of SoCalGas witness Mark  
18 Serrano (Ex. SCG-223).

19           **B. CSF Supervision Cost Category**

20           Organizational, CSF field employees report to CSF field supervisors. Like field  
21 employees, field supervisors are geographically dispersed across all of SoCalGas’ 51 operating  
22 bases. Field supervisors hire and coach employees, conduct safety and job observations,  
23 coordinate with the dispatch office and others to address and resolve issues, respond to  
24 emergency incidents to provide on-site leadership, and manage the overall performance of the  
25 CSF employees who work from each of the 51 operating bases.

26           Table SAF-15 below provides a summary comparison of the parties’ respective TY 2016  
27 forecasts for the CSF Supervision cost category.

1 **TABLE SAF-15**

2 **Summary Comparison – CSF Supervision Cost Category**

<b>TY 2016 Forecast – Constant 2013 (\$000)</b>		
	<b>SoCalGas</b>	<b>ORA</b>
2013 Adjusted-Recorded Costs	11,118	11,118
Adjustment Based on Proposed TY 2016 Forecast Methodology	1,833	1,146
<b>Other Incremental Funding Requests:</b>		
MSA Inspection Program Supervisors	437	0
<b>Total</b>	<b>13,388</b>	<b>12,264</b>

3 **1. ORA**

4 ORA takes issue with SoCalGas’ TY 2016 forecast for the CSF Supervision cost  
5 category. In its testimony (Ex. ORA-13), ORA makes the statements and assertions reproduced  
6 below, as its justification for recommending a TY 2016 forecast that is significantly less than  
7 SoCalGas proposes, i.e., \$12.264 million versus \$13.388 million. Each of ORA’s arguments is  
8 rebutted below.

9 ORA states, “*ORA utilized a five year average (2009-2013) as a basis to calculate its*  
10 *estimate of \$12.264 million (Labor of \$11.124 million and Non-Labor of \$1.140 million) for*  
11 *SCG’s CSF Supervision expenses.*” (Ex. ORA-13, page 62, lines 3-5)

12 Like SDG&E’s forecast for the CSF Supervision cost category (which ORA supports<sup>122</sup>),  
13 SoCalGas’ forecast of TY 2016 supervision costs is based on the TY 2016 forecast for CSF  
14 Operations and maintaining the existing 2013 employee-to-supervisor span of control of 12:1.  
15 SoCalGas’ forecast reflects the incremental supervisor requirements resulting from SoCalGas’  
16 workload forecast, including the new services SoCalGas is proposing to implement. SoCalGas’  
17 forecast methodology results in a TY 2016 forecast that is \$1.833 million above BY 2013  
18 adjusted-recorded levels compared to ORA’s five-year average forecast methodology which  
19 results in a TY 2016 forecast that is \$1.146 million above 2013 adjusted-recorded costs.

20 ORA’s use of a five-year (2009-2013) historical average for supervision costs is not  
21 consistent with ORA’s CSF Operations forecast in that ORA does not account for incremental  
22 supervisor requirements that would result from the incremental TY 2016 funding proposals ORA  
23 presented for the CSF Operations cost category (e.g., customer growth, increased drive time, new

<sup>122</sup> Ex. ORA-13, page 9, lines 12-14.

1 customer service offerings, etc., as summarized in Table SAF-3 above), all of which result in  
2 additional field technician positions that would require incremental supervision.

3 Second, ORA states, “*SCG’s adjusted-recorded expenses (2009) for its CSF Supervision*  
4 *include overtime costs that SCG can reallocate in the TY for its proposed positions.*” (Ex. ORA-  
5 *13, page 63, footnote 170)*

6 Overtime costs are incurred when supervisors are required to respond to emergency  
7 incidents after hours. Overtime costs are recurring costs that fluctuate from year to year  
8 depending on the number and size of emergency incidents within any given year. Overtime costs  
9 for supervisors were relatively small (an average of approximately \$158,000/year) during the  
10 period from 2009-2013.<sup>123</sup> Because supervisors will be required to continue to respond to  
11 emergency incidents after hours, to provide on-site supervision when multiple employees are  
12 called out to respond to an incident, it is not feasible to reallocate supervisory overtime costs.  
13 Regardless, the cost of supervisory overtime would be insufficient to cover the costs for which  
14 ORA proposes to reallocate overtime costs.

15 Third, ORA states, “*SCG’s request for an increase of 20.42% over 2013 adjusted-*  
16 *recorded expenses is not justified. SCG’s expenses have been on a downward trend since 2011.*”  
17 (Ex. ORA-13, page 62, lines 16-17)

18 SoCalGas’ TY 2016 forecast includes \$0.437 million for incremental supervisors that will  
19 be required to supervise MSA inspection personnel that are proposed within the CSF cost  
20 category in order to continue complying with the DOT’s MSA inspection requirements post AMI-  
21 implementation.<sup>124</sup> In addition to not accounting for the incremental funding proposals ORA  
22 makes with respect to the CSF Operations cost category, which translate into incremental  
23 supervisors, ORA has not accounted for any MSA Inspection Program supervisors in its forecast  
24 even though it recommends \$1.633 million in incremental TY 2016 funding for MSA inspection  
25 personnel in the CSF Operations cost category.

---

<sup>123</sup> Compiled from data provided to ORA in response to ORA-SCG-DR-052-TLG, Q.17., a copy of which is provided in Appendix C.

<sup>124</sup> As explained in footnote 88, SoCalGas’ TY 2016 funding request for MSA Inspection Program supervisors is incremental to the level of funding approved in the Commission’s AMI decision.

1 SoCalGas presented detailed forecasting assumptions in its workpapers regarding TY  
2 2016 costs for CSF Supervision.<sup>125</sup> ORA ignores the merits of SoCalGas' forecasting  
3 assumptions and instead uses a flawed, broad-brush forecasting methodology.

4 Fourth, ORA states, "*ORA's use of a five year average methodology provides additional*  
5 *funding of \$1.146 million over 2013 recorded expenses and is sufficient for SCG to maintain its*  
6 *2013 ratio and its proposed ratio for MSA inspections.*" (Ex. ORA-13, page 63, footnote 173)

7 ORA does not provide any calculations, assumptions or substantiation to back up this  
8 assertion.

9 Fifth, ORA states, "*SCG's MSA inspections 'are part of a meter reader's normal work.'*  
10 *SCG's historical expenses (2009-2013) include embedded labor and non-labor costs incurred for*  
11 *the same activities that SCG has included in its TY 2016 forecast.*" (Ex. ORA-13, page 63, lines 5-  
12 7)

13 As explained above, the embedded Meter Reading costs to which ORA refers are  
14 eliminated and do not exist pursuant to the Commission's AMI decision (D.10-04-027). Without  
15 the funding SoCalGas requests for TY 2016, SoCalGas would not be able to comply with DOT  
16 MSA inspection requirements.

17 Sixth, ORA states,

18 *SCG's historical expenses (2009-2013) include costs incurred for one-*  
19 *time, non-recurring and unusual expenses (expenses incurred that are*  
20 *not necessary or required to operate the utility business). ORA*  
21 *discovered that SCG did not remove all these costs, which are*  
22 *incorporated into ORA's TY 2016 estimate and provides embedded*  
23 *funding that SCG can reallocate in the TY for proposed activities. (Ex.*  
24 *ORA-13, page 63, footnote 176)*

25 ORA did not identify, specify or quantify any such costs in its testimony and ORA did not  
26 provide any workpapers. In response to a data request from SoCalGas (SEU-ORA-DR-06, Q.  
27 1d.), ORA did not provide any specificity or quantification of costs as requested. Contrary to  
28 ORA's assertion, "significant expense fluctuations from year to year" do not by definition make  
29 the costs "one-time and non-recurring" as ORA suggests. SoCalGas' forecast of TY 2016 non-  
30 labor expenses for the CSF Supervision category is based on a five year-average. The years for  
31 which costs are lower than the average are offset by the years for which costs are higher than the

---

<sup>125</sup> Ex. SCG-10-WP, pages 24, 27 and 80.

1 average.

2 While ORA does not identify and quantify specific costs in its response to SEU-ORA-DR-  
3 06, Q. 1d., ORA suggests the following examples of “non-recurring costs” and “costs that are not  
4 required to operate the utility business, that ORA did not remove from its forecast, and that can be  
5 reallocated to SoCalGas’ proposed activities” -- “brand awareness and loyalty surveys, employee  
6 meals, luncheons, entertainment, gift cards, employee recognition, holiday events, various  
7 corporate events, tickets to sporting events, certain employee/company dues and memberships,  
8 and employee laundry.”<sup>126</sup> For the CSF Supervision cost category, costs for ORA’s proposed  
9 non-recurring items, to the extent any costs were actually incurred (for example, no costs were  
10 incurred within the CSF Supervision cost category for “brand awareness and loyalty surveys”),  
11 averaged approximately \$132,000 per year during the period from 2009-2013, far short of the  
12 difference between ORA and SoCalGas’ forecasts of TY 2016 expenses for the CSF Supervision  
13 cost category. Furthermore, the costs incurred within the CSF Supervision cost category were  
14 part of running the business. Meals, for example, are provided when supervisors attend meetings  
15 or training sessions that run through lunch; it is often more efficient to provide food onsite rather  
16 than have everyone leave the facility to obtain lunch and then return.

17 Clearly, ORA made a broad-brushed assertion without applying any rigor or detail to its  
18 analysis. For the reasons outlined above, ORA’s assertion is without merit and should be  
19 rejected.

20 Seventh, ORA states,

21 *SCG acknowledges in its response above that the ‘FTEs and costs*  
22 *associated with MSA inspection activity are embedded in the 2009-2013*  
23 *recorded adjusted costs for the four Meter Reading work groups.’ SCG’s*  
24 *response does not demonstrate that additional funding of \$2.270 million*  
25 *is required for DOT MSA inspections in the TY. (Ex. ORA-13, page 64,*  
26 *lines 20-24)*

27 SoCalGas explained in its testimony and in data responses that, while MSA inspections  
28 were previously conducted by Meter Reading, those costs are being eliminated pursuant to the  
29 Commission’s AMI decision (D.10-04-027). Meter Reading costs are treated as a benefit in the  
30 AMIBA and therefore these exact benefits must be reflected as Meter Reading costs in this GRC.

---

<sup>126</sup> A copy of ORA’s response to SEU-ORA-DR-06, Q.1d, is provided in Appendix B.

1 Otherwise, a double counting of AMI benefits would occur. The same effect occurs if the  
2 Commission reallocates AMI Meter Reading benefits to fund a new activity. If the Commission  
3 disallows incremental funding for MSA inspections and reallocates Meter Reading costs that are  
4 eliminated as a result of AMI, then the Commission has effectively disallowed Meter Reading  
5 costs and, again, a double benefit occurs. The Commission recognized this fact in D.13-05-010,  
6 wherein the Commission states:

7 We agree with SoCalGas' position on the test year 2012 forecasts of the meter reading  
8 costs, and that DRA's recommended disallowances should not be adopted. As SoCalGas'  
9 witness explained in Exhibit 143, the test year 2012 forecast of meter reading expenses do  
10 not include the SoCalGas advanced metering infrastructure costs or benefits. D.10-04-027  
11 includes the meter reading benefits which reflect the increases requested and authorized in  
12 SoCalGas' test year 2008 GRC.<sup>127</sup>

13 If we adopt the two disallowances recommended by DRA, this will result in a double  
14 reduction to SoCalGas' revenue requirement.<sup>128</sup>

15 As set forth in SoCalGas' workpapers,<sup>129</sup> SoCalGas is requesting TY 2016 funding  
16 totaling \$0.437 million for MSA Inspection Program supervisors, not \$2.270 million as ORA  
17 suggests. MSA inspection personnel (for which ORA supports partial, "one-third" funding in the  
18 CSF Operations cost category) would not be able to work without supervision. ORA's above  
19 assertion is inaccurate and inconsistent and should therefore be rejected.

20 Eighth, ORA states, "*SCG calculates additional TY 2016 funding but cannot calculate*  
21 *and provide specific detail on recorded historical costs (2009-2013) for DOT MSA inspections for*  
22 *review and analysis.*" (Ex. ORA-13, page 64, lines 24-26)

23 Meter Reading supervisors are responsible for supervising meter readers. Meter readers,  
24 in turn, obtain monthly meter reads at customer premises and, in conjunction with doing so,  
25 record using their MDT devices, conditions they observe at the MSA, including atmospheric  
26 corrosion. SoCalGas has not historically captured or tracked the time spent reading the meter  
27 versus recording conditions found. Nor has SoCalGas historically captured or tracked Meter  
28 Reading supervisor time at that level of granularity. With Meter Reading supervisors and  
29 associated funding being eliminated pursuant to the Commission's AMI decision (D.10-04-027),

---

<sup>127</sup> D.13-05-010, page 507.

<sup>128</sup> D.13-05-010, page 508. This is further explained in the rebuttal testimony of witness Rene Garcia, Ex. SCG-239, pages RFG-3-4.

<sup>129</sup> Ex. SCG-10-WP, page 80.

1 SoCalGas' TY 2016 forecast is based on the assumption that four "replacement" supervisors will  
2 be needed to supervise the MSA inspection employees who will conduct the required,  
3 approximately 1.9 million MSA inspections per year.<sup>130</sup>

4 ORA does not object to supervisors being needed for the new MSA Inspection Program  
5 but, rather, erroneously assumes SoCalGas can use embedded historical Meter Reading funding  
6 (which will no longer exist) to cover such costs. ORA does not understand that Meter Reading  
7 costs are eliminated as a result of AMI and D.10-04-027. Therefore, ORA's assertion must be  
8 rejected.

9 Ninth, ORA states, "*SCG's testimony does not discuss why it is not able to reallocate or*  
10 *incorporate embedded costs associated with DOT MSA inspections for the same or similar*  
11 *activities proposed in the TY.*" (Ex. ORA-13, page 64, lines 26-28)

12 Again, ORA's assertion is based on an erroneous assumption that Meter Reading funding  
13 will continue to exist post-AMI implementation.

14 Lastly, ORA states, "*SCG's ratepayers should not be burdened with providing additional*  
15 *funding for proposed activities that have recorded historical costs that SCG cannot identify.*" (Ex.  
16 *ORA-13, page 64, lines 28-30*)

17 Historical costs associated with Meter Reading conducting the MSA inspections are not  
18 relevant given that there will be no Meter Reading funding pursuant to the Commission's AMI  
19 decision (D.10-04-027). ORA's assertion ignores the merits of SoCalGas' zero-based forecast of  
20 the incremental funding that will be required in order for SoCalGas to continue to comply with  
21 the DOT MSA inspection requirements going forward. ORA has not raised any objections or  
22 concerns about any of the detailed planning assumptions and forecasts contained in SoCalGas'  
23 testimony and workpapers.<sup>131</sup> Rather, ORA merely makes erroneous, broad-brush assertions that  
24 would leave SoCalGas with insufficient funding to comply with the DOT's CFR 192.481 and  
25 conduct the approximate 1.9 million required inspections per year.

## 26 **2. Other Parties**

27 Aside from ORA, no party has objected to, raised concerns about, or contested SoCalGas'  
28 TY 2016 forecast for the CSF Supervision cost category.

---

<sup>130</sup> Ex. SCG-10, page SAF-19; Ex. SCG-10-WP, page 80.

<sup>131</sup> Exs. SCG-10, page SAF-24, lines 22-26, and SCG-10-WP, page 80.

1 **C. CSF Dispatch Cost Category**

2 No parties took issue with SoCalGas' TY 2016 forecast for the CSF Dispatch cost  
3 category.

4 **D. CSF Support Cost Category**

5 The CSF Support cost category includes: (1) centralized training (classroom instructors,  
6 supervisors and a training manager; (2) field instructors who accompany new residential field  
7 technicians immediately following their formal training, QA inspectors and a QA supervisor who  
8 inspect the work of field technicians; (3) field technology support personnel who maintain the  
9 field MDTs, work management, routing and reporting systems used by CSF operations; (4)  
10 operations clerks who are located at the field operating bases; and (5) region and district  
11 management and administrative associates.

12 Table SAF-16 below provides a summary comparison of the parties' respective TY 2016  
13 forecasts for the CSF Support cost category, by cost element.<sup>132</sup>

14 **TABLE SAF-16**

15 **Summary Comparison – CSF Support Cost Category**

<b>TY 2016 Forecast – Constant 2013 (\$000)</b>		
	<b>SoCalGas</b>	<b>ORA</b>
2013 Adjusted-Recorded Costs	9,758	9,758
TY 2016 Forecast (five-year average)	778	0
<b>Incremental Funding Requests:</b>		
MSA Inspection Program Manager	130	0
Meter Access Clerks for MSA Inspection Program	290	0
QA Inspector for MSA Inspection Program	90	0
Technical Specialist for MSA Inspection Program (to manage inspection routes)	91	0
Field Technician Training Improvements	563	327
Commercial/Industrial Field Technicians	398	398
Technology Specialist to manage new wireless access for all field MDTs	87	87
New AT&T wireless network access fees for field MDTs	438	438
<b>Total</b>	<b>12,623</b>	<b>11,008<sup>133</sup></b>

16  
<sup>132</sup> As explained in footnote 88, SoCalGas' TY 2016 funding request for MSA Inspection Program positions is incremental to the level of funding approved in the Commission's AMI decision.

<sup>133</sup> Although ORA indicates in its testimony in several places (Ex. ORA-13, page 65, line 9 and Table 13-30; page 66, line 6) that it recommends TY 2016 funding of \$11.033 million, the total for the itemized amounts ORA presents is \$11.008 million, which is consistent with Ex. ORA-13, page 69, Footnote 192.





1 The differences between SoCalGas and ORA's TY 2016 forecasts include the following:

- 2 • A difference of \$0.778 million due to the fact that ORA uses 2013 adjusted-  
3 recorded costs (presumably because 2013 is the lowest spending year from 2009-  
4 2014), whereas SoCalGas uses a five-year average given the variability in costs  
5 from year to year;
- 6 • A difference of \$0.601 million for MSA Inspection Program costs, which ORA  
7 erroneously asserts does not need to be funded since these costs are embedded in  
8 historical Meter Reading costs (even though Meter Reading costs are eliminated  
9 pursuant to the Commission's AMI decision, D.10-04-027); and
- 10 • A difference of \$0.236 million due to ORA's recommendation to only partially  
11 fund needed CSF training improvements proposed by SoCalGas.

12 Third, ORA states,

13 *SCG's historical expenses (2009-2013) include costs incurred for one-*  
14 *time, non-recurring and unusual expenses (expenses that are not*  
15 *necessary or required to operate the utility business). ORA discovered*  
16 *that SCG did not remove all these costs, which are incorporated into*  
17 *ORA's TY 2016 estimate and provides embedded funding that SCG can*  
18 *reallocate in the TY for proposed activities. (Ex. ORA-13, page 65,*  
19 *footnote 180)*

20 Based on its assertion, ORA does not object to the merits of SoCalGas' proposed  
21 incremental funding requests. Rather, ORA merely again seeks hypothetical and nonexistent  
22 funding sources for SoCalGas' proposed incremental activities. In the interest of not being  
23 repetitive, the same flaws identified in ORA's assertion for the CSF Operations and CSF  
24 Supervision cost categories apply to the CSF Support cost category as well.

25 Fourth, ORA states,

26 *SCG's request for an increase of 29.36% over 2013 adjusted-recorded*  
27 *expenses is not justified. SCG's testimony, workpapers, and data request*  
28 *responses are insufficient and lack supporting detail for its incremental*  
29 *funding request of \$2.865 million over 2013 adjusted-recorded expenses.*  
30 *(Ex. ORA-13, page 66, lines 1-4)*

31 ORA's above table (Table 13-30) reflects the variability in CSF Support costs from year  
32 to year and hence SoCalGas' proposed use of a five-year average forecasting methodology as set  
33 forth in SoCalGas' testimony.<sup>136</sup> Incremental MSA Inspection Program requirements, including

---

<sup>136</sup> Ex. SCG-10, page SAF-27.

1 related details and justification, are set forth in the same testimony and workpapers.<sup>137</sup>  
2 Specifically, SoCalGas identified all assumptions and calculations in Ex. SCG-10-WP, page 80.  
3 The only difference between SoCalGas and ORA's MSA Inspection Program forecasts is that  
4 ORA erroneously assumed that Meter Reading funding will be available for this purpose. And  
5 the only other difference between SoCalGas and ORA's forecasts is that ORA recommends  
6 partial funding (i.e., \$0.327 million versus \$0.563 million) for SoCalGas' proposed training  
7 improvements.

8 With the exception of SoCalGas' proposed training improvements, ORA did not raise any  
9 objections or concerns about any of the detailed assumptions and calculations contained in  
10 SoCalGas' workpapers.<sup>138</sup> ORA merely makes a broad-brush assertion, based solely on 2013  
11 adjusted-recorded costs, that ignores the facts and merits associated with each of SoCalGas'  
12 individual, well-documented and incremental funding requests. Therefore, ORA's assertion must  
13 be rejected.

14 Fifth, ORA states, "*SCG does not identify or provide any discussion for proposed TY*  
15 *2016 activities totaling \$0.778 million, the difference between \$2.865 million and \$2.087*  
16 *million.*" (Ex. ORA-13, page 66, footnote 181)

17 \$0.778 million is the difference between the five-year average cost (2009-2013) of  
18 \$10.536 million for the CSF Support cost category, and 2013 adjusted-recorded costs of \$9.758  
19 million. As reflected in ORA's Table 13-30 above, CSF Support costs vary from year to year;  
20 thus a five-year average forecast methodology is appropriate. While SoCalGas did not use 2014  
21 data in any of its forecasts, it is again worth noting that CSF Support costs were \$11.308 million  
22 in 2014, which is greater than the five-year average and 2013 adjusted-recorded expenses.  
23 SoCalGas' five-year average forecasting methodology, plus incremental adjustments, is  
24 appropriate for this cost category.

25 Lastly, ORA states, "*SCG's adjusted-recorded expenses decline by \$1.257 million or*  
26 *12.88% between 2010 and 2013. ORA's estimate of \$11.033 million<sup>139</sup> is comparable with SCG's*  
27 *most recent expense activity for this work group.*" (Ex. ORA-13, page 66, lines 4-7)

28 As reflected in ORA's Table 13-30 above, 2009-2013 costs for the CSF Support cost  
29 category fluctuated up and down. While SoCalGas did not have or use 2014 data in its forecasts,

---

<sup>137</sup> Exs. SCG-10, pages SAF-28-29; SCG-10-WP, page 80.

<sup>138</sup> Ex. ORA-13, pages 65-68.

<sup>139</sup> SoCalGas believes this should be \$11.008 million based on ORA's testimony.

1 it is again worth noting that 2014 adjusted-recorded costs were \$11.308 million, or 15.9%, higher  
2 than 2013 adjusted-recorded costs. There is no basis for choosing the year with the lowest  
3 adjusted-recorded costs for SoCalGas' TY 2016 forecast; therefore ORA's proposal to do so  
4 should be rejected.

5 **b. MSA Inspection Program**

6 ORA states,

7 *ORA recommends that SCG's request for additional funding of \$0.601*  
8 *million over 2013 adjusted-recorded expenses for DOT MSA*  
9 *inspections be denied. SCG's historical expenses (2009-2013) already*  
10 *include embedded labor and non-labor costs incurred for the same*  
11 *activities that SCG has included in its TY 2016 forecast. Those*  
12 *activities and related historical costs were incurred for making access*  
13 *arrangements and resolving issues with inaccessible or difficult to*  
14 *access meters ensuring that meter readers adhere to policies and*  
15 *procedures, designing, rebuilding and maintaining meter reading*  
16 *routes, and performing other related administrative duties. (Ex. ORA-*  
17 *13, page 67, lines 15-22)*

18 ORA does not raise any concerns or objections regarding SoCalGas' TY 2016 forecast  
19 for MSA Inspection Program elements contained within the CSF cost category. ORA's sole  
20 assertion is that the entire \$0.601 million SoCalGas request for DOT MSA inspection  
21 requirements is already covered within historical embedded Meter Reading costs. Because  
22 Meter Reading costs will no longer exist pursuant to the Commission's AMI decision (D.10-04-  
23 027), ORA's assertion is inaccurate and must be rejected.

24 Second, ORA states,

25 *SCG's TY 2016 forecast includes incremental non-labor costs for 'Can't*  
26 *Get In (CGI)' door tags that SCG's meter readers leave on the door of a*  
27 *customer when they are unable to gain access to a meter. SCG's*  
28 *historical expenses include embedded costs for CGI tags. (Ex. ORA-13,*  
29 *page 67, footnote 188)*

30 Again, ORA does not take issue with SoCalGas' TY 2016 forecasts related to MSA  
31 Inspection Program costs but, rather merely erroneously asserts that historical embedded costs  
32 can be used to cover the required funding. As discussed previously, Meter Reading costs,  
33 including all historical embedded costs associated with MSA inspections, are eliminated and will  
34 no longer exist pursuant to the Commission's AMI decision (D.10-04-027). Therefore, the  
35 forecasted TY 2016 incremental funding is required to enable SoCalGas to continue to comply

1 with the DOT's CFR 192.481 regarding MSA inspections.

2 Third, ORA states,

3 *ORA finds it troubling that SCG is able to calculate additional funding*  
4 *without difficulty for DOT MSA inspections, but is not able to provide*  
5 *specific detail on recorded historical costs (2009-2013) for those*  
6 *inspections so that the historical expenses can be reviewed, analyzed*  
7 *and compared to SCG's TY 2016 forecast. (Ex. ORA-13, page 68, lines*  
8 *14-18)*

9 In its testimony, ORA does not raise any concerns or objections regarding any of the  
10 detailed forecasting assumptions SoCalGas used as the basis for developing its forecast of TY  
11 2016 costs for the new MSA Inspection Program, all of which were set forth in the testimony and  
12 workpapers of SoCalGas witness Sara Franke.<sup>140</sup> ORA merely infers that because historical data  
13 has not been captured or tracked at the granular level of detail ORA requested, it is not possible  
14 to forecast future costs, which is an erroneous inference. SoCalGas presented detailed  
15 forecasting assumptions, none of which were contested by ORA.<sup>141</sup>

16 Fourth, ORA states, "*SCG's testimony does not discuss why the utility is not able to*  
17 *reallocate and/or incorporate embedded costs associated with DOT MSA inspections in the TY*  
18 *2016 for the same or similar activities.*" (Ex. ORA-13, page 68, lines 18-21)

19 SoCalGas clarified for ORA, in response to data request ORA-SCG-DR-052-TLG, Q.  
20 1.b.,<sup>142</sup> that the Commission's AMI decision (D.10-04-027) eliminates Meter Reading funding.  
21 Meter Reading historically identified atmospheric corrosion and other conditions observed at  
22 customer meters in conjunction with obtaining monthly meter reads at customer premises for  
23 billing purposes. With AMI implementation, the Meter Reading function is being eliminated, as  
24 are the costs associated with that function. Therefore, no historical Meter Reading costs,  
25 including Support costs, can be reallocated to the new, "replacement" MSA Inspection Program  
26 as ORA suggests. ORA raises a red-herring regarding MSA historical costs. SoCalGas has  
27 repeatedly stated that SoCalGas does not and cannot capture or track costs related to a specific  
28 task (e.g., atmospheric corrosion inspection) within a meter reader's daily functions and  
29 activities. While reading each meter, a meter reader will read a meter and also conduct a visual  
30 observation for the MSA inspection. SoCalGas does not capture or track the time the meter

---

<sup>140</sup> Exs. SCG-10, pages SAF 28-29; SCG-10-WP, page 80.

<sup>141</sup> Exs. SCG-10, pages SAF 28-29; SCG-10-WP, page 80.

<sup>142</sup> A copy of ORA's data request and SoCalGas' response is provided in Appendix C of this testimony.

1 reader has taken to conduct the MSA inspection within the meter reader's total route time. All  
2 SoCalGas can ascertain is that the route was completed within the allotted time frame. No cost  
3 per MSA inspection is captured nor can it be captured for historical purposes.

4 Fifth, ORA states, "*SCG ratepayers should not be burdened with providing additional*  
5 *funding for proposed TY activities that have recorded historical costs that SCG cannot identify.*"  
6 (*Ex. ORA-13, page 68, lines 21-22*)

7 Historically, MSA inspections were an inherent part of physically reading meters at  
8 customer premises each month. Related Support costs were not historically captured or tracked  
9 separately as the two activities (i.e., reading meters and, at the same time, identifying abnormal  
10 conditions found at the same meters) were completely intertwined. All Meter Reading  
11 department costs, including Meter Reading Support costs, are eliminated with AMI  
12 implementation. ORA has not raised any specific concerns or objections regarding any of the  
13 detailed assumptions contained in SoCalGas TY 2016 forecast, or the Support positions<sup>143</sup> for  
14 which SoCalGas is requesting funding. ORA's broad-brush assertion ignores the detailed  
15 forecasting assumptions SoCalGas presented and should therefore be rejected.

16 **c. Field Technician Training Improvements**

17 ORA states,

18 *ORA recommends incremental funding of \$327,000 for these proposed*  
19 *activities. (Ex. ORA-13, page 66, lines 18-19). ORA calculated its*  
20 *estimate of \$327,133 as follows: \$209,200 for two Refresher Training*  
21 *Instructors, \$104,600 for a Training Modernization Specialist and*  
22 *\$13,333 ( $\$40,000/3 = \$13,000$ ) for one-time costs for audio/video*  
23 *equipment. (Ex. ORA-13, page 66, footnote 164)*

24 SoCalGas requested \$0.563 million in incremental TY 2016 funding for CSF training  
25 modernization and other training improvements. ORA does not take issue with SoCalGas'

---

<sup>143</sup> The requested MSA Inspection Program support positions set forth in Exs. SCG-10, pages SAF-28-29, and SCG-10-WP, pages 78-82, include the following: MSA Inspection Program Manager to oversee the inspection organization and ensure compliance with DOT CFR 192.481; Meter Access Clerks who will manage access to chronically inaccessible/difficult to access meters, as well as provide other general administrative and clerical support for the MSA Inspection Program; a Quality Assurance Inspector who will inspect the work of the MSA inspection personnel to ensure inspections are completed in accordance with policies and procedures; and a Technical Specialist who will design and maintain meter inspection routes, including incorporating new meters, as well as maintaining the MDT handheld units that will be used by the MSA inspection personnel. SoCalGas witness Evan Goldman sponsors costs associated with customer calls to SoCalGas' call center regarding MSA inspections (Ex. SCG-11, page EDG-18).

1 proposed funding of \$313,800 for refresher training instructors and a training modernization  
2 specialist. And SoCalGas does not object to ORA’s proposed funding level of \$13,333 (versus  
3 \$40,000) for the purchase of new audio visual equipment since this is a one-time purchase. That  
4 leaves \$209,334 (for two policy review and reinforcement instructors and associated non-labor  
5 costs) over which ORA and SoCalGas disagree.

6 ORA further states, “SCG’s request for incremental funding of \$0.209 million for policy  
7 review training should be denied because this is an ongoing and routine activity and SCG’s  
8 historical expenses include costs associated with policy review training.” (Ex. ORA-13, page  
9 67, lines 1-3)

10 CSF supervisors located at each of SoCalGas’ 51 different operating bases, currently  
11 review with all CSF employees policies, as well as ongoing changes to those policies. Because  
12 there is an inherent risk of 51 different supervisors interpreting and presenting policies to  
13 employees in 51 different ways, SoCalGas believes it would be more effective (and deepen  
14 employee understanding of policies), to have two policy specialists conduct ongoing policy  
15 review sessions with employees, rather than rely solely on supervisors at each operating base to  
16 perform this role.<sup>144</sup>

17 Contrary to ORA’s assertion, these would be incremental positions that require  
18 incremental funding, as the need for supervisors would not diminish as a result of this  
19 improvement.

20 Third, ORA states,

21 *SCG states, “Currently supervisors meet regularly with their*  
22 *employees to review policies, including communicating ongoing*  
23 *changes/updates to policies and procedures.” SCG did not provide*  
24 *any recorded or documented problems associated with its current*  
25 *procedures established for staff policy reviews that would require*  
26 *additional funding over 2013 expense levels. (Ex. ORA-13, page 67,*  
27 *lines 3-8)*

28 SoCalGas’ request for funding to establish two policy review and reinforcement  
29 instructor positions is based on SoCalGas’ efforts to continuously improve the effectiveness of  
30 its policy review processes, and to ensure policies are consistently interpreted and applied across  
31 SoCalGas’ service territory. SoCalGas’ CSF training organization brought to management’s  
32 attention a need for improvement based on the fact that when CSF employees attend training at

---

<sup>144</sup> Ex. SCG-10, page SAF-30, lines 12-21.

1 SoCalGas' Pico Rivera training facility they do not always possess the level of policy knowledge  
2 and understanding that is required. Establishing two policy review instructor positions, to  
3 reinforce and deepen employee understanding of policies and procedures in a consistent manner  
4 across all 51 operating bases, is intended to improve upon SoCalGas' current process for  
5 reviewing policies with employees.

6 Fourth, ORA states,

7 *SCG can reallocate funding that is currently being incurred by its*  
8 *supervisors that 'meet regularly with their employees to review policies,*  
9 *including communicating ongoing policy changes/updates to policies*  
10 *and procedures' and fund its proposed TY 2016 positions. (Ex. ORA-13,*  
11 *page 67, lines 8-11)*

12 No supervisor positions would be eliminated as a result of SoCalGas' proposal, as  
13 supervisors would still be needed for myriad other reasons beyond conducting policy review  
14 sessions with employees. Supervisors will continue to be responsible for employees correctly  
15 applying SoCalGas policies and practices. Supervisors will continue to be responsible for  
16 employee performance, including employee work productivity and quality. Therefore, there  
17 would be no opportunity to reallocate supervisor costs as ORA is proposing.

18 **d. Commercial/Industrial Field Instructors**

19 ORA does not take issue with SCG's TY 2016 forecast of \$0.398 million for four new  
20 commercial/industrial field instructor positions to supplement existing residential field instructor  
21 positions.<sup>145</sup>

22 **e. Technology Specialist to Manage New Wireless Access for all**  
23 **Field MDTs**

24 ORA does not take issue with SoCalGas' TY 2016 forecast of \$0.087 million for a new  
25 position to manage wireless access for all field MDTs.<sup>146</sup>

26 **f. New AT&T Wireless Network Access Fees for Field MDTs**

27 ORA does not take issue with SoCalGas' TY 2016 forecast of \$0.438 million for AT&T  
28 wireless network access fees for field MDTs.<sup>147</sup>

29  

---

<sup>145</sup> Ex. SCG-10, page SAF-31; Ex. ORA-13, page 66, lines 8-12.

<sup>146</sup> Ex. SCG-10, page SAF-32, lines 6-11; Ex. ORA-13, page 66, lines 8-12.

<sup>147</sup> Ex. SCG-10, page SAF-32, lines 12-21; Ex. ORA-13, page 66, lines 8-12.



1                                   **2. Other Parties**

2                   Aside from ORA, no party has objected to, raised concerns about, or contested SoCalGas’  
3 TY 2016 forecast for the CSF Support cost category.

4                   **E. Meter Reading Operations Cost Category**

5                   ORA does not take issue with SoCalGas’ TY 2016 forecast of \$30.382 million for the  
6 Meter Reading Operations cost category.<sup>148</sup> No party has objected to, raised concerns about, or  
7 contested SoCalGas’ TY 2016 forecast for the Meter Reading Operations cost category.

8                   **F. Meter Reading Clerical Cost Category**

9                   ORA does not take issue with SoCalGas’ TY 2016 forecast of \$1.113 million for the  
10 Meter Reading Clerical cost category.<sup>149</sup> No party has objected to, raised concerns about, or  
11 contested SoCalGas’ TY 2016 forecast for the Meter Reading Clerical cost category.

12                   **G. Meter Reading Supervision and Training Cost Category**

13                   ORA does not take issue with SoCalGas’ TY 2016 forecast of \$4.058 million for the  
14 Meter Reading Supervision and Training cost category.<sup>150</sup> No party has objected to, raised  
15 concerns about, or contested SoCalGas’ TY 2016 forecast for the Meter Reading Supervision and  
16 Training cost category.

17                   **H. Meter Reading Support Cost Category**

18                   ORA does not take issue with SoCalGas’ TY 2016 forecast of \$2.488 million for the  
19 Meter Reading Support cost category.<sup>151</sup> No party has objected to, raised concerns about, or  
20 contested SoCalGas’ TY 2016 forecast for the Meter Reading Support cost category.

21                   **I. Other**

22                   TURN identifies CSF and Meter Reading costs totaling \$3,578 dollars for “tickets to  
23 sporting and cultural events and clothing and promotional gear,” which TURN proposes be  
24 removed from the TY 2016 forecast. TURN makes the following assertion which is addressed  
25 below, *“These costs are not necessary to provide utility service and should be removed.”*<sup>152</sup>

26                   The costs incurred for sporting event tickets and SoCalGas apparel were a means SoCalGas  
27 used to differentiate and reward top performance by employees, including perfect safety records

---

<sup>148</sup> Ex. SCG-10, pages SAF-34-38; Ex. ORA-13, page 44, lines 7-18.

<sup>149</sup> Ex. SCG-10, pages SAF-38-39; Ex. ORA-13, page 44, lines 7-18.

<sup>150</sup> Ex. SCG-10, pages SAF-40-41; Ex. ORA-13, page 44, lines 7-18.

<sup>151</sup> Ex. SCG-10, pages SAF-41-42; Ex. ORA-13, page 44, lines 7-18.

<sup>152</sup> Ex. TURN-Marcus, pages 46-47.

1 by employee teams for extended periods of time. Nominal, non-monetary means such as this are  
2 typically used to recognize bargaining unit employees given that union employees are not part of  
3 the pay-for-performance, incentive compensation program. Recognizing employees for top  
4 performance is an important part of running any business.

5 **IV. REBUTTAL TO PARTIES' O&M PROPOSALS – SHARED COSTS**

6 **A. CSF Staff Cost Category**

7 CSF Staff is comprised primarily of management personnel who develop and update CSF  
8 policies and procedures, including Gas Standards and Information Bulletins; track, analyze and  
9 report operational data; and manage special projects for CSF operations. Although the CSF Staff  
10 is primarily centralized in SoCalGas' Los Angeles headquarters building, this organization  
11 supports both SoCalGas and SDG&E's CSF organizations.

12 Table SAF-17 below provides a summary comparison of the parties' respective TY 2016  
13 forecasts for the CSF Staff cost category, by cost element.

14 **TABLE SAF-17**

15 **Summary Comparison – CSF Staff Cost Category**

<b>TY 2016 Forecast – Constant 2013 (\$000)</b>		
	<b>SoCalGas</b>	<b>ORA</b>
2013 Adjusted-Recorded Costs	1,571	1,571
Adjustment Based on Proposed TY 2016 Forecast Methodology	166	166
<b>Incremental Funding Requests:</b>		
New Director Position	186	0
Expanded Diversion Investigation Program	483	0
<b>Total</b>	<b>2,406</b>	<b>1,737</b>

16 **1. ORA**

17 ORA takes issue with SoCalGas' TY 2016 forecast for the CSF Staff cost category. In its  
18 testimony (Ex. ORA-13), ORA makes the statements and assertions reproduced below as its  
19 justification for recommending a TY 2016 forecast that is significantly less than SoCalGas  
20 proposes, i.e., \$1.737 million versus \$2.406 million. Each of ORA's arguments is rebutted  
21 below.

1                    **a.        New Customer Services Staff Director Position**

2                    ORA states,

3                    *ORA recommends no additional funding over 2013 expenses for SCG's*  
4                    *newly created Director position. SCG's reorganization was a*  
5                    *management decision, and prior to the reorganization, these functions*  
6                    *reported to other existing managers and directors within the company.*  
7                    *(Ex. ORA-13, page 71, lines 5-8)*

8                    With the increased focus on pipeline safety and growth in pipeline integrity related  
9 projects it became apparent that the Gas Distribution and CSF organizational structure that was  
10 in place prior to 2014 was no longer optimal. Beginning in early 2014, the four Gas Distribution  
11 and CSF Region Directors were separated into two Gas Distribution-only Region Directors and  
12 two CSF-only Region Directors. The corresponding Staff organizations were also separated into  
13 one Staff organization for Gas Distribution and a separate Staff organization for CSF. The  
14 Customer Services Staff Director is responsible for the following functions, for which there is a  
15 manager for each, reporting to the new Director position: (1) CSF Staff (responsible for CSF  
16 policies and procedures, analysis and reporting; (2) CSF Training and Development (i.e.,  
17 SoCalGas' Pico Rivera CSF training center, where all CSF field employees are trained, (3) CSF  
18 Technology (responsible for all CSF MDTs, as well as the work order management, routing, and  
19 reporting systems that enable CSF operations), (4) Quality Assurance, and (5) start-up of the new  
20 MSA Inspection Program.

21                    Given the scope of responsibilities, and the fact that the counterpart position on the Gas  
22 Distribution side of SoCalGas is also a Director level position, this position was created in 2014  
23 and is currently managing the organization described above. TY 2016 funding is appropriate for  
24 this position.

25                    ORA further states,

26                    *SCG's testimony does not discuss or demonstrate any reportable*  
27                    *problems which prevented SCG from efficiently and effectively*  
28                    *performing required activities prior to the organizational changes. SCG*  
29                    *can reallocate an existing position and related costs embedded in*  
30                    *historical expenses for this position. (Ex. ORA-13, page 71, lines 8-12)*

31                    ORA makes this recommendation without any facts of substantiation to back it up. It is  
32 not clear which position or "embedded costs" ORA is proposing be reallocated. SoCalGas does  
33 not have embedded historical costs that can be reallocated as ORA suggests.

1                                 **b.           Gas Diversion Investigation Program**

2           SoCalGas’ proposed Diversion Investigation Program<sup>153</sup> is similar to a staff already in  
3 place at SDG&E (sponsored by SDG&E witness Brad Baugh, Ex. SDG&E-14, pages BMB 28-  
4 29), for which ORA proposed no disallowances. In contrast to its treatment of SDG&E, ORA  
5 recommends that SoCalGas’ entire TY 2016 funding request of \$0.483 million be rejected.

6           In its testimony (Ex. ORA-13), ORA makes the statements and assertions reproduced  
7 below as its justification for recommending zero incremental funding for SoCalGas’ proposed  
8 Diversion Investigation Program. Each of ORA’s assertions is rebutted below.

9           First, ORA states, “*ORA’s use of a five year average provides SCG with sufficient*  
10 *funding to address its additional gas diversion activities.*” (Ex. ORA-13, page 70, lines 16-17)

11           Using a five-year average (2009-2013) to forecast CSF Staff costs, as both SoCalGas and  
12 ORA propose, avoids the potential for artificially inflating or deflating results based on short-  
13 term anomalies. The five-year average expense is \$0.166 million above 2013 adjusted-recorded  
14 costs, far short of the incremental \$0.483 million SoCalGas is requesting for a Gas Diversion  
15 Investigation Program that is similar in scope and size to that which is in place at SDG&E and to  
16 which ORA raised no objections in its testimony.

17           Second, ORA states, “*SCG’s historical expenses (2009-2013) include embedded costs for*  
18 *its gas diversion program.*” (Ex. ORA-13, page 70, lines 20-21)

19           Contrary to ORA’s assertion, the CSF Staff cost category includes historical embedded  
20 costs for one SoCalGas diversion investigator, who has been able to keep up with an average of  
21 only 17% of reports of potential gas diversion instances identified by SoCalGas field employees  
22 who observe conditions at customer premises in the field.<sup>154</sup> The other embedded costs to which  
23 ORA refers are in the CSF Operations, CSF Supervision and Meter Reading Operations cost  
24 categories and include only those costs associated with: (a) identifying instances of potential  
25 diversion; and (b) addressing any immediate safety issues, such as shutting off gas service to the  
26 customer’s premise. The additional five positions for which SoCalGas is requesting TY 2016  
27 funding (i.e., four diversion investigators and one diversion investigation supervisor) are needed  
28 to fully investigate potential diversion incidents (e.g., including coordinating with Security and  
29 law enforcement, as well as analyzing and assessing potential back billing requirements); to

---

<sup>153</sup> Exs. SCG-10, pages SAF-45-46, and SCG-10-WP, page 170.

<sup>154</sup> Ex. SCG-10, pages SAF-45-46.

1 develop prevention strategies; and to conduct proactive meter spot checks throughout SoCalGas’  
2 service territory given that meter readers will no longer be visiting meters every month.<sup>155</sup>

3 Third, ORA states,

4 *SCG states “SCG has been aware of the inherent safety risks associated*  
5 *with gas diversion and has not waited until the 2016 GRC in order to*  
6 *address this issue. SoCalGas has always had and will continue to have*  
7 *safeguards in place to mitigate risks associated with gas diversion.”*  
8 *(Ex. ORA-13, page 70, lines 21-23)*

9 While SoCalGas has had safeguards in place to deter diversion, and promptly addresses  
10 any immediate safety hazards, SoCalGas’ TY 2016 funding request is intended to improve  
11 current efforts and enable diversion investigation follow-up on more than 17% of the number of  
12 potential instances of diversion reported by field employees. Diversion investigation follow-up  
13 includes performing research and analysis on billing history, gathering the necessary evidence to  
14 bill customers for the gas stolen, developing prevention strategies and spot checking meters in  
15 the field.<sup>156</sup> ORA’s assertion selectively ignores information SoCalGas provided in response to  
16 data requests it received from ORA regarding SoCalGas’ current and proposed diversion  
17 investigation efforts.<sup>157</sup>

18 Fourth, ORA states,

19 *SCG proposes to expand its gas diversion program in TY 2016. SCG*  
20 *already has embedded costs for gas diversion activities, so utilizing a*  
21 *five year average provides additional funding for the expanded gas*  
22 *diversion program. (Ex. ORA-13, page 71, lines 1-4) SCG’s forecast of*  
23 *\$483,000 for its gas diversion activities, normalized over three years is*  
24 *\$161,000. ORA’s use of a five year average (2009-2013) provides*  
25 *\$166,000 in additional funding, which is comparable to the normalized*  
26 *amount of \$161,000, to address SCG’s additional gas diversion*  
27 *activities. (Ex. ORA-13, page 71, footnote 198)*

28 By suggesting that \$161,000 be used for incremental diversion investigation activities,  
29 ORA acknowledges there is merit to SoCalGas’ request for incremental funding for an expanded  
30 diversion investigation program. However, ORA provides no basis for dividing SoCalGas’  
31 incremental funding request by three.

---

<sup>155</sup> SoCalGas response to ORA-SCG-DR-052-TLG (Q.19.h.) dated February 23, 2015.

<sup>156</sup> SoCalGas response to ORA-SCG-052-TLG (Q.19.k.) dated February 23, 2015.

<sup>157</sup> A copy of SoCalGas’ responses to ORA data requests regarding gas diversion are provided in Appendix C of this testimony.

1 As mentioned previously, SDG&E has a diversion investigation staff of five employees,  
2 and ORA has raised no objections to providing ongoing funding for SDG&E's diversion  
3 investigation program. Given that SoCalGas' customer base and service territory are larger than  
4 SDG&E, SoCalGas' request for five incremental diversion investigation positions, in addition to  
5 the one position already in historical embedded costs, is a reasonable and prudent request, which  
6 should be adopted. The other aspects of ORA's assertion have already been addressed above.

7 **2. Other Parties**

8 No other party has objected to, raised concerns about, or contested SoCalGas' TY 2016  
9 forecast for the CSF Staff cost category.

10 **V. REBUTTAL TO PARTIES' CAPITAL PROPOSALS**

11 **A. Summary Comparison of the Parties' Capital Proposals**

12 Table SAF-18 below provides a summary comparison of the parties' capital proposals.<sup>158</sup>

13 **TABLE SAF-18**  
14 **Capital Proposals**

<b>TOTAL CAPITAL - Constant 2013 (\$000)</b>			
	<b>2014</b>	<b>2015</b>	<b>2016</b>
<b>SoCalGas</b>	3,096	437	7,217
<b>ORA</b>	2,605	437	7,217

15 **1. ORA**

16 ORA's IT capital witness recommends utilizing 2014 adjusted-recorded capital  
17 expenditures for 2014 capital costs.

18 **2. Other Parties**

19 None of the other intervening parties raised any objections or concerns regarding  
20 SoCalGas' TY 2016 capital forecast.

21 **V. CONCLUSION**

22 To summarize, SoCalGas presented detailed forecasting assumptions and rationale for  
23 each and every TY 2016 funding request put forth in its testimony, none of which have been  
24 challenged on their merits by ORA. With respect to TY 2016 forecasts for CSF activities, ORA  
25 presents only broad-brush, numerical assertions throughout its testimony, which are not

---

<sup>158</sup> Ex. ORA-15, page 5, Table 15-4.

1 substantiated, are based on erroneous assumptions and/or ignore altogether the details and merits  
2 of SoCalGas' testimony and workpapers. ORA supports SoCalGas' TY 2016 forecast for Meter  
3 Reading.

4 UCAN's sole proposal with respect to CSF and Meter Reading is to modify the  
5 forecasting methodology for two of SoCalGas' fifty CSF work order types, "Seasonal Off" and  
6 "Seasonal On" work orders. UCAN does not present an associated dollar amount by which it  
7 proposes to reduce SoCalGas' TY 2016 forecast of expenses. Regardless, UCAN's proposed  
8 forecasting methodology would yield unreasonable and illogical results, as illustrated in this  
9 rebuttal testimony.

10 TURN's only proposal – to eliminate \$3,578 dollars in employee recognition costs  
11 (sporting event tickets and company apparel) – should also be rejected for the reasons set forth in  
12 this testimony.

13 Aside from policy proposals, which should be rejected for the reasons set forth in this  
14 testimony, UWUA takes issue only with the number of MSA inspection positions required post  
15 AMI implementation when meter readers, who have historically performed this function, are  
16 eliminated. SoCalGas agrees additional inspection positions will be required, but for reasons  
17 that are different than UWUA suggests, and at a lower pay rate. UWUA's proposal to provide  
18 one-day service for all turn-on/reconnect and other orders should also be rejected for the reasons  
19 set forth herein.

20 No other parties submitted testimony regarding SoCalGas' TY 2016 forecasts for CSF  
21 and Meter Reading activities.

22 For the aforementioned reasons, the Commission should adopt SoCalGas' TY 2016  
23 forecast of expenses for CSF and Meter Reading activities, reject the cost forecasts put forth by  
24 ORA, and address policy related matters in the manner set forth in this testimony.

25 This concludes my prepared rebuttal testimony.

APPENDIX  
TO  
REBUTTAL TESTIMONY  
OF  
SARA FRANKE  
ON BEHALF OF SoCALGAS  
CUSTOMER SERVICES FIELD  
AND  
METER READING



## **APPENDIX ATTACHMENTS**

- A. Work Order Volume Forecast by Individual Order Type, Updated to Include 2014 Data
- B. SoCalGas Data Request (SEU-ORA-DR-06) and ORA Responses
- C. ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Responses
  - 1. Question 1.b
  - 2. Question 5
  - 3. Question 6
  - 4. Question 8
  - 5. Question 10
  - 6. Question 17
  - 7. Question 19.h-k
  - 8. Question 21.d-e
  - 9. Question 22
  - 10. Question 25

**Appendix A - Work Order Volume Forecasts by Individual Order Type, Updated to Include 2014 Data**

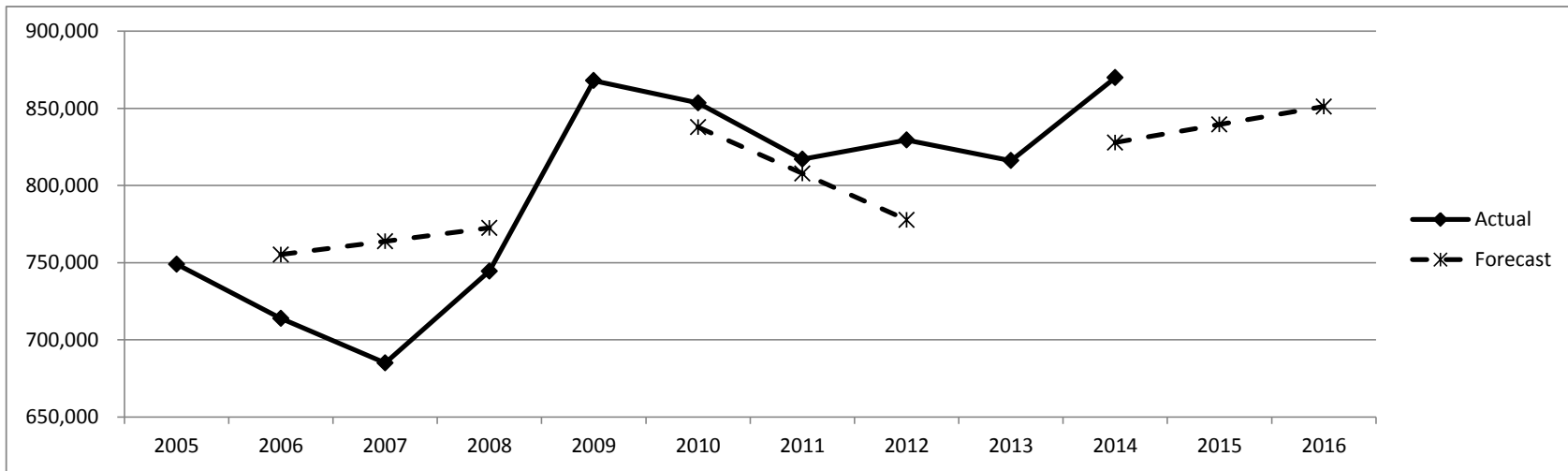
### Change of Account - Turn On (Not Entered)

**Source** Customer Work  
**Order Group** Change of Account  
**Order Type** Turn On (Not Entered)

**Description:** This is change of account activity. This work is performed to establish a new customer's account. No appliance work is performed. The meter is read, the meter is inspected, and gas flow is observed to ensure it is not above normal usage. This order type is impacted by Advanced Meter.

Historical Averages	
5-Yr Avg	836,818
4-Yr Avg	829,036
3-Yr Avg	820,873

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	748,968	713,816	685,037	744,493	867,948	853,524	817,040	829,470	816,110	869,869		
Forecast		755,158	763,847	772,536		837,865	807,781	777,698		827,797	839,483	851,170



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly higher than normal due to economic conditions in the real estate market.

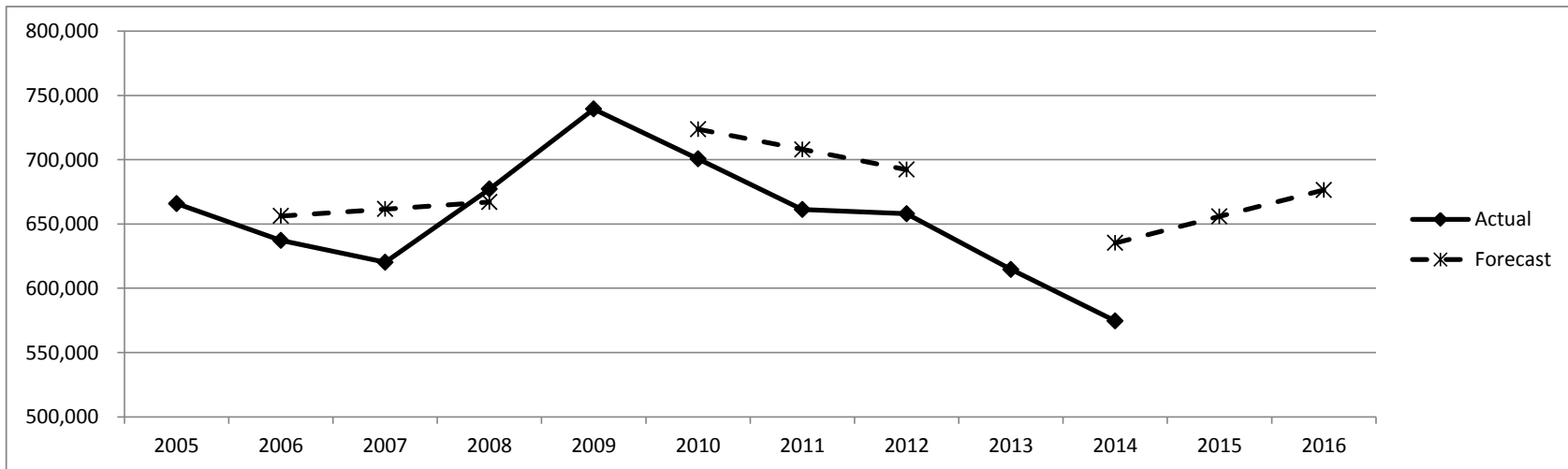
### Change of Account - Close (Soft)

**Source** Customer Work  
**Order Group** Change of Account  
**Order Type** Close (Soft)

**Description:** This is change of account activity. This work is performed to terminate a customer's account at their request. The meter is read, the meter is inspected, and gas flow is observed to ensure it is not above normal usage. This order type is impacted by Advanced Meter.

Historical Averages	
5-Yr Avg	674,803
4-Yr Avg	658,661
3-Yr Avg	644,642

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	665,886	637,219	620,290	677,210	739,373	700,716	661,230	657,993	614,703	574,659		
Forecast		656,190	661,587	666,983		723,692	708,012	692,331		635,258	655,814	676,369



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly higher than normal due to economic conditions in the real estate market.

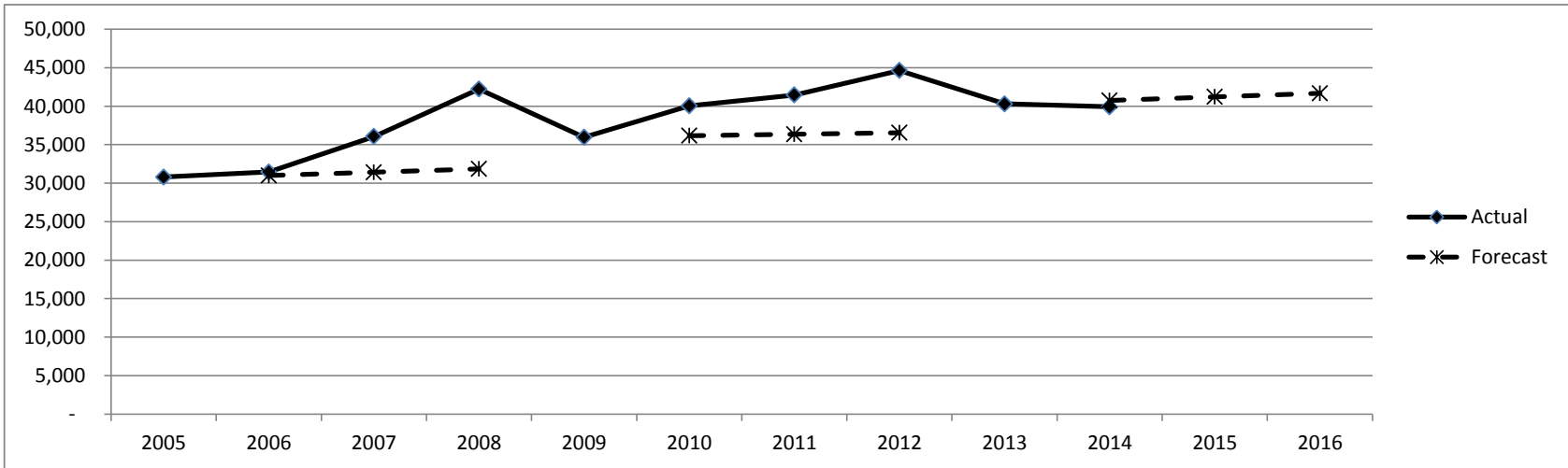
### Credit/Collections - 48 Hour (1st Call)

Source Customer Work  
 Order Group Credit/Collections  
 Order Type 48 Hour (1st Call)

**Description:** Prior to shutting off gas service for nonpayment, this is an attempt to collect an unpaid balance from the customer, allowing 48 hours to make payment arrangements. If payment is not rendered, a notice is provided, containing payment locations and telephone numbers for SoCalGas' Customer Contact Center.

Historical Averages	
5-Yr Avg	40,483
4-Yr Avg	41,611
3-Yr Avg	42,129

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	30,793	31,448	36,056	42,220	35,974	40,054	41,450	44,640	40,298	39,908		
Forecast		30,978	31,411	31,851		36,169	36,364	36,558		40,755	41,212	41,668



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer's ability to pay their bills, which are outside the company's control.

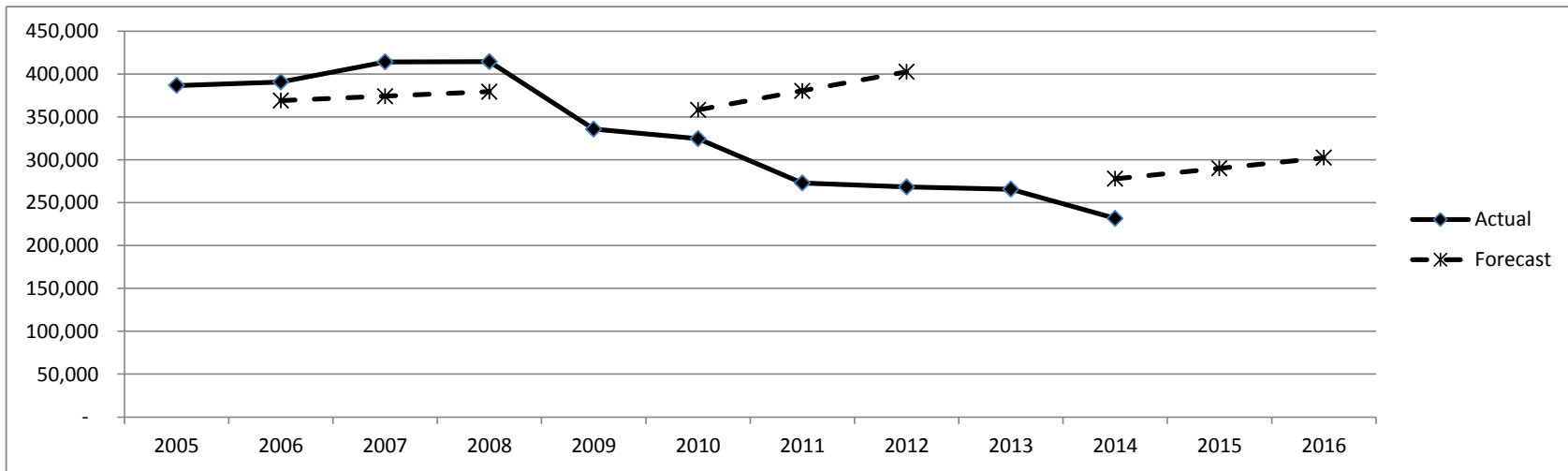
### Credit/Collections - Collect/Close (2nd Call)

**Source** Customer Work  
**Order Group** Credit/Collections  
**Order Type** Collect/Close (2nd Call)

**Description:** This is an attempt to collect on an unpaid customer balance. If customer is unable to pay, the gas service is hard closed (close valve and secure with a locking device) when possible. A 1st Call order has already been completed if required.

Historical Averages	
5-Yr Avg	293,514
4-Yr Avg	282,904
3-Yr Avg	269,018

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	386,730	390,882	414,096	414,568	335,953	324,563	273,003	268,332	265,719	231,732		
Forecast		369,064	374,231	379,470		358,216	380,479	402,743		277,964	290,208	302,453



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer's ability to pay their bills, which are outside the company's control.

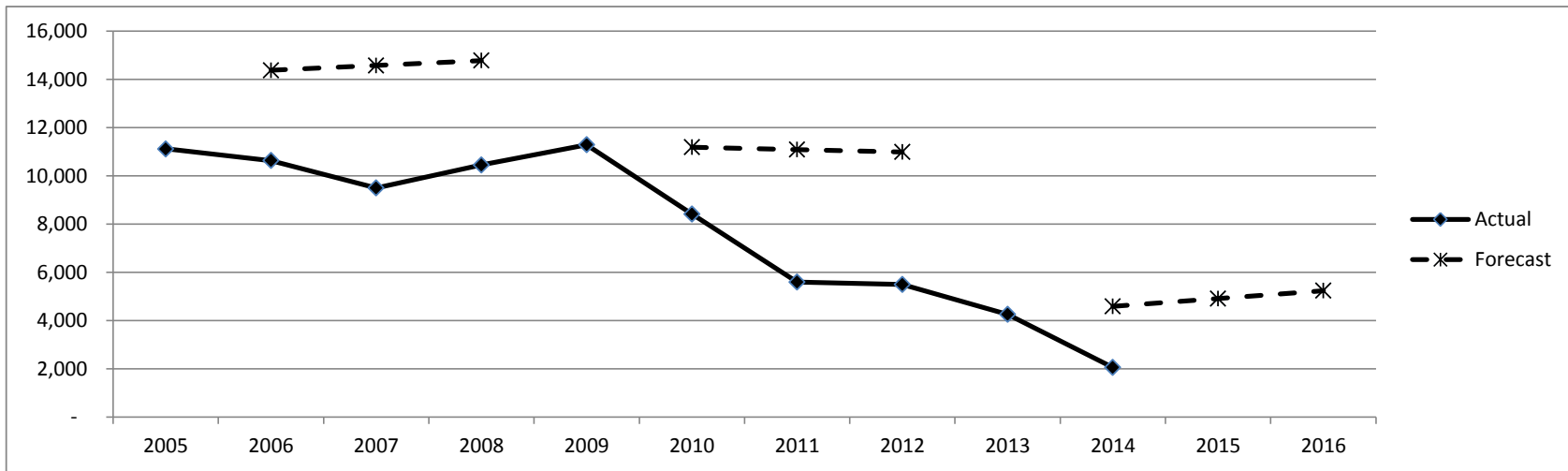
### Credit/Collections - Returned Check

Source Customer Work  
 Order Group Credit/Collections  
 Order Type Returned Check

**Description:** When a payment is made by check and the account lacked sufficient funds to cover the unpaid balance, a collect or close order is issued and the customer must pay in cash, money order or certified check for gas service to remain on. If the customer is unable to pay, the gas valve is closed and secured with a locking device.

Historical Averages	
5-Yr Avg	7,008
4-Yr Avg	5,937
3-Yr Avg	5,111

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	11,117	10,631	9,493	10,447	11,290	8,415	5,590	5,490	4,253	2,049		
Forecast		14,377	14,578	14,782		11,189	11,087	10,986		4,580	4,908	5,235



**Forecasting Method:** 3-Year Avg (Orders to Active Meters)

Used shorter period to account for the fact that the economy has improved and more customers are paying their bills electronically, which results in fewer bounced checks (insufficient funds).

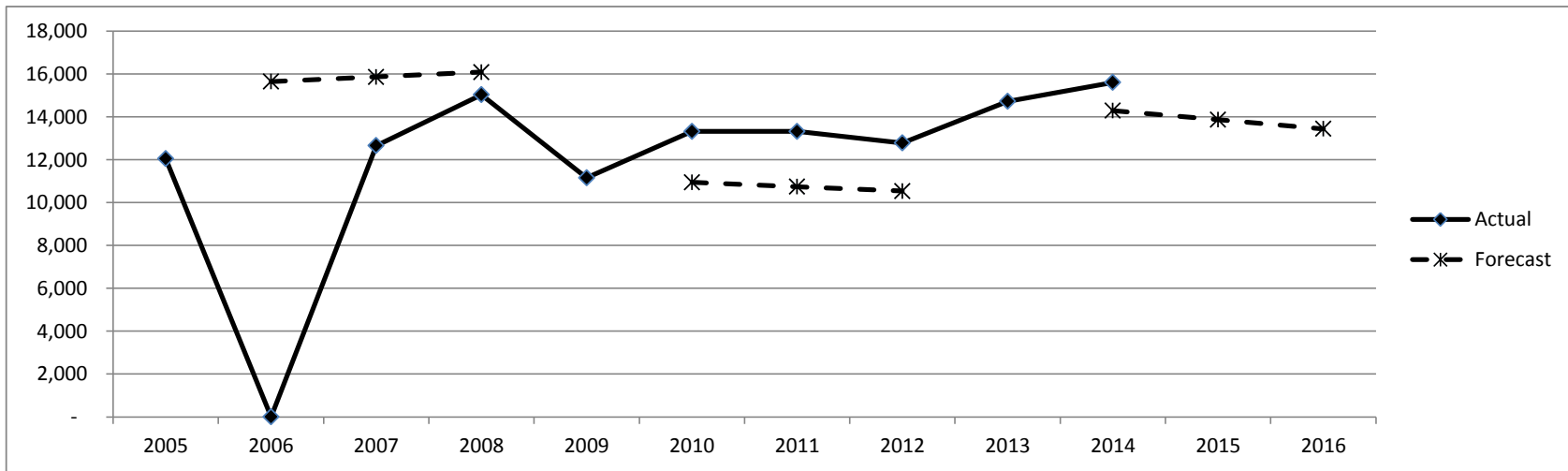
### Credit/Collections - Tenant Notification

Source Customer Work  
 Order Group Credit/Collections  
 Order Type Tenant Notification

**Description:** Written notification is posted at the property address informing the tenants that the gas account is delinquent and the service will be closed if the account holder fails to pay.

Historical Averages	
5-Yr Avg	13,060
4-Yr Avg	13,537
3-Yr Avg	13,608

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	12,053	2	12,657	15,035	11,155	13,322	13,321	12,782	14,722	15,606		
Forecast		15,646	15,865	16,087		10,949	10,743	10,536		14,295	13,867	13,440



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customers' ability to pay their bills, which are outside the company's control.



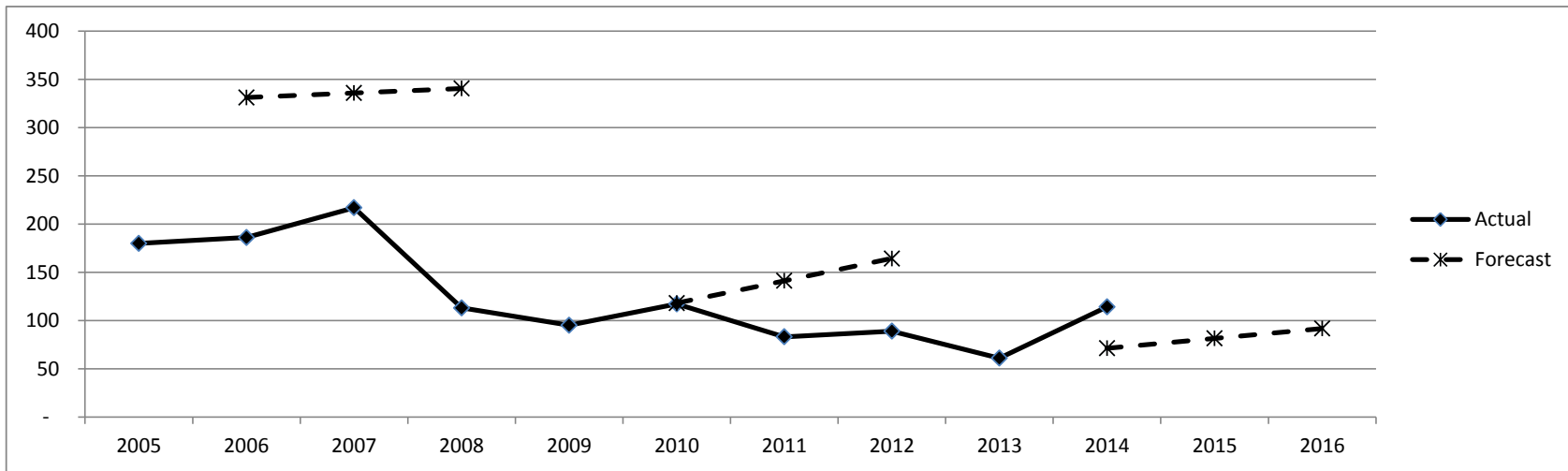
### Credit/Collections - Other

Source Customer Work  
 Order Group Credit/Collections  
 Order Type Other

**Description:** This order type is used for miscellaneous collections-related work not covered by other order types.

Historical Averages	
5-Yr Avg	89
4-Yr Avg	88
3-Yr Avg	78

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	180	186	217	113	95	117	83	89	61	114		
Forecast		331	336	341		118	141	164		71	81	92



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer's ability to pay their bills, which are outside the company's control.

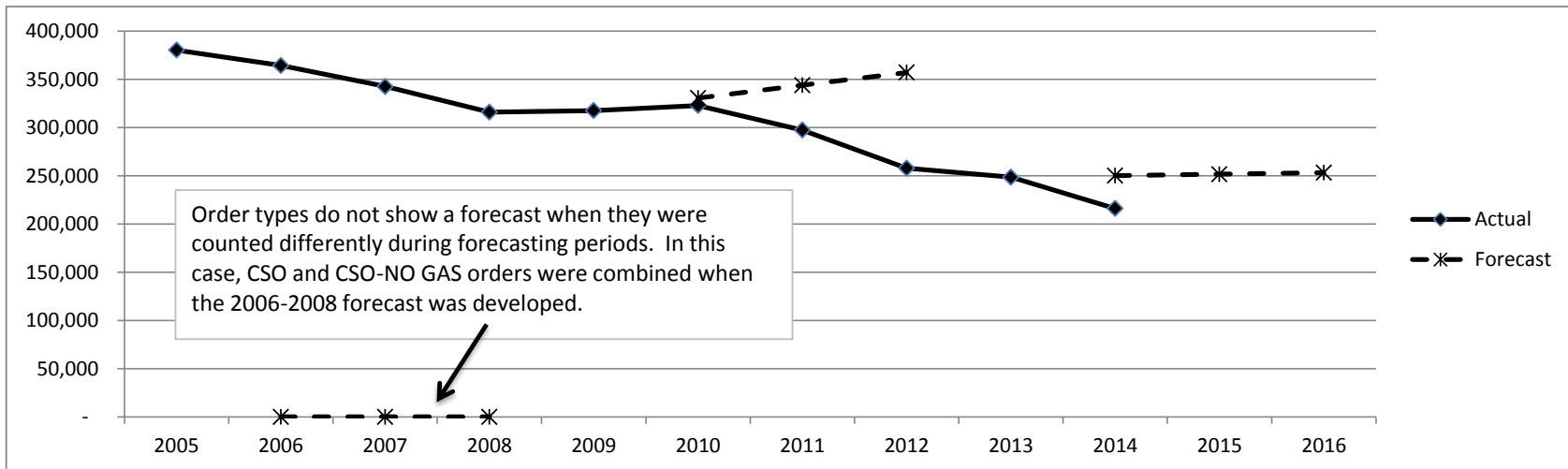
## CSO

**Source** Customer Work  
**Order Group** CSO  
**Order Type** CSO

**Description:** This is an order type where the customer requests that a gas appliance be checked (e.g., inoperative water heater).

Historical Averages	
5-Yr Avg	288,834
4-Yr Avg	281,653
3-Yr Avg	267,931

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	380,358	364,356	342,585	315,930	317,561	322,817	297,480	257,830	248,483	215,998		
Forecast		-	-	-		330,724	343,886	357,049		250,016	251,550	253,083



**Forecasting Method:** Base Year (Orders to Active Meters)

Forecast recognizes a declining trend. Factors outside the company's control, such as weather and associated requests to check customers' space heating equipment, may impact order volumes in the future.

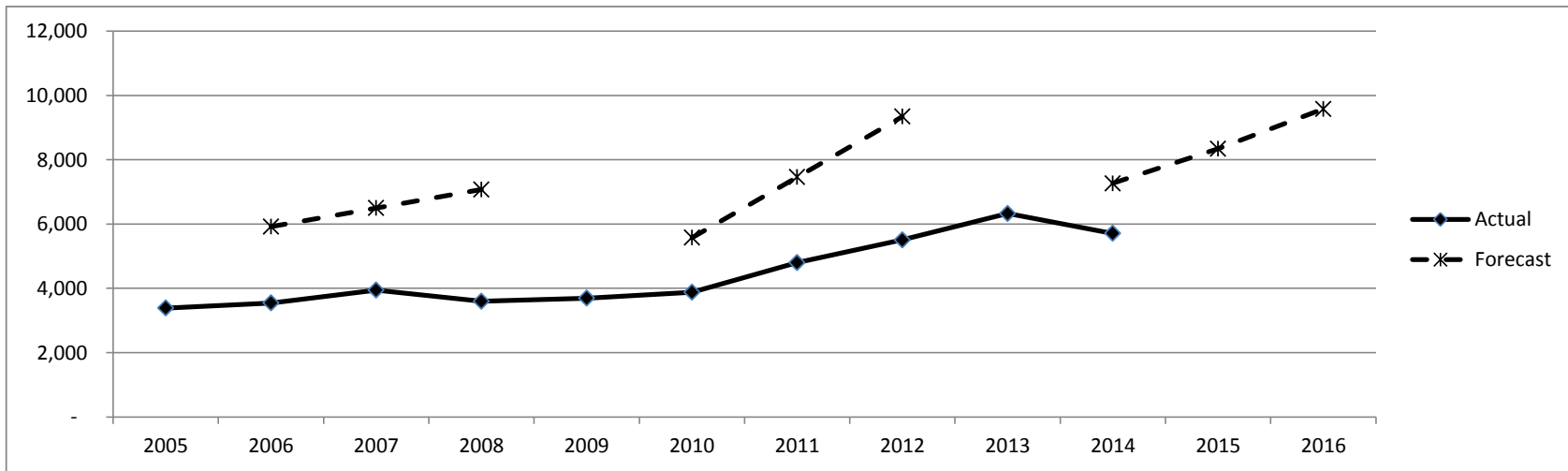
## CSO - CO-Test

**Source** Customer Work  
**Order Group** CSO  
**Order Type** CO-Test

**Description:** This order type is used when a customer requests a Carbon Monoxide (CO) test to ensure the safety of their home. The field technician checks for CO levels present in the customer's home.

Historical Averages	
5-Yr Avg	4,841
4-Yr Avg	5,128
3-Yr Avg	5,545

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	3,387	3,546	3,944	3,601	3,694	3,876	4,799	5,507	6,328	5,709		
Forecast		5,922	6,497	7,071		5,577	7,460	9,344		7,266	8,344	9,582



**Forecasting Method:** Base Year + Avg Change 11 -> 12 -> 13

There has been continual growth in this order type since Senated Bill 183 was enacted. Order volume growth is expected to continue as more customers comply with the legal requirement to install CO detectors in residential dwellings.

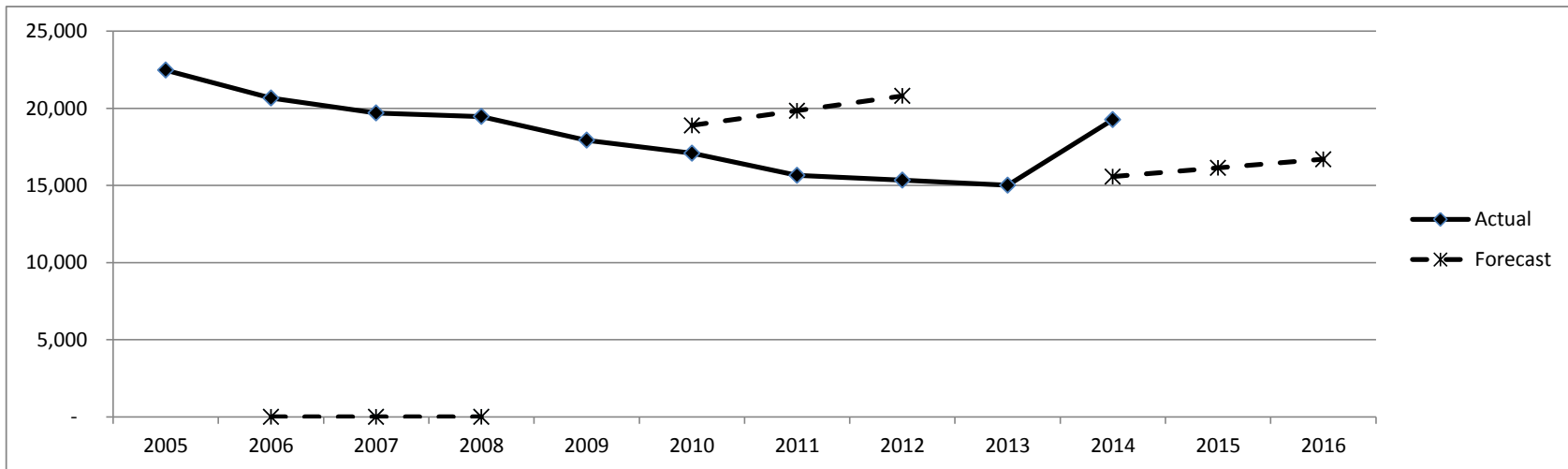
## CSO - No Gas

**Source** Customer Work  
**Order Group** CSO  
**Order Type** No Gas

**Description:** This order type is used when a customer calls to indicate their gas appliances are not working and the reason is unknown or not covered by other order types.

Historical Averages	
5-Yr Avg	16,201
4-Yr Avg	15,769
3-Yr Avg	15,331

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	22,473	20,660	19,696	19,464	17,931	17,084	15,643	15,338	15,011	19,258		
Forecast		-	-	-		18,886	19,841	20,796		15,571	16,131	16,691



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as earthquake valves tripping, etc., which are outside the company's control.

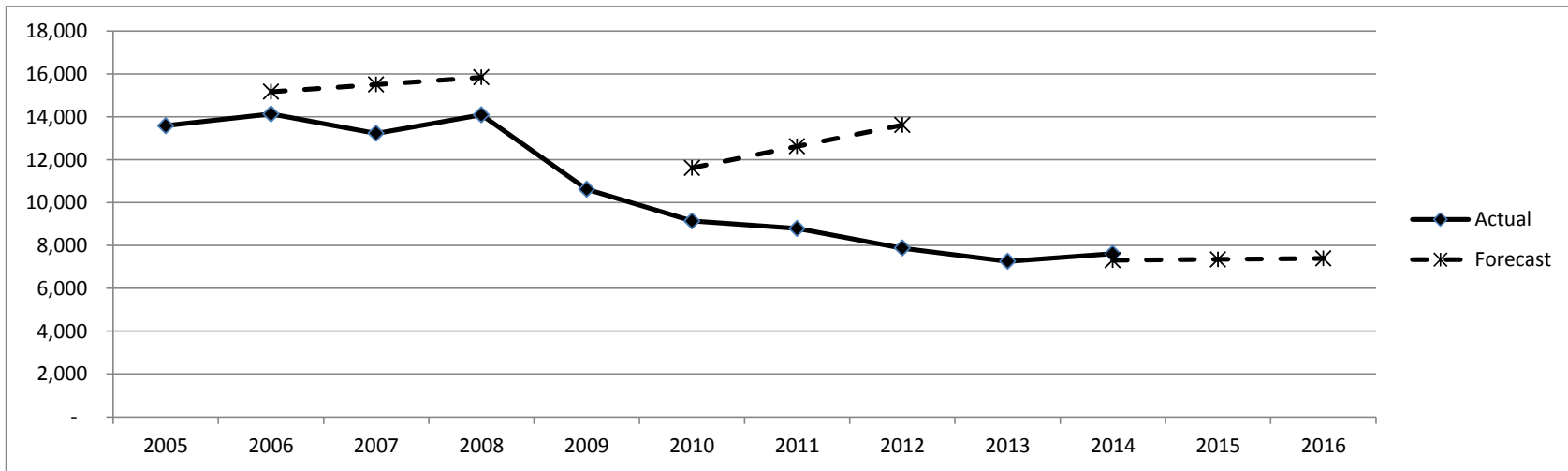
## CSO - Seasonal Off

**Source** Customer Work  
**Order Group** CSO  
**Order Type** Seasonal Off

**Description:** This order type is used when a customer requests that a gas space heating appliance with a pilot or electronic ignition be turned off. The field technician closes the control or line valve. A full safety check is performed on the heating appliance before closing the gas supply.

Historical Averages	
5-Yr Avg	8,738
4-Yr Avg	8,268
3-Yr Avg	7,976

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	13,589	14,136	13,232	14,099	10,620	9,144	8,788	7,878	7,261	7,620		
Forecast		15,171	15,506	15,842		11,621	12,623	13,624		7,306	7,351	7,395



**Forecasting Method:** Base Year (Orders to Active Meters)

Forecast method recognizes a declining trend in service order volumes for this order type. Factors outside the company's control, such as weather and customer comfort levels, may impact order volumes in the future.

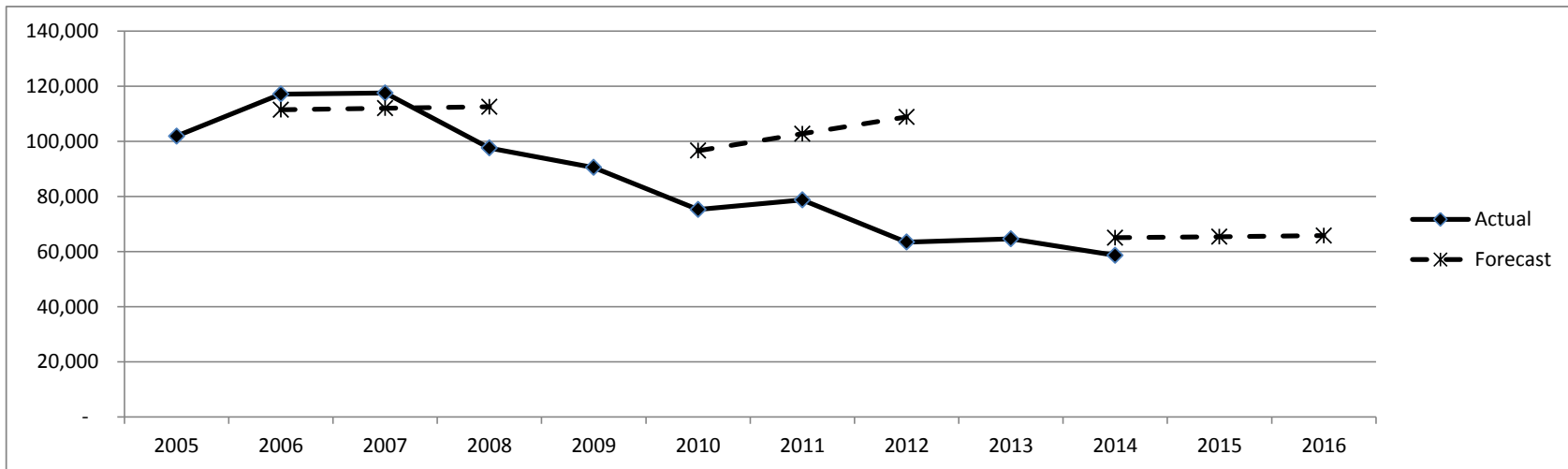
## CSO - Seasonal On

**Source** Customer Work  
**Order Group** CSO  
**Order Type** Seasonal On

**Description:** This order type is used when a customer requests that a heating appliance be turned on. The field technician conducts a full safety check on the heating appliance before leaving the gas supply valve on.

Historical Averages	
5-Yr Avg	74,506
4-Yr Avg	70,505
3-Yr Avg	68,918

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	101,886	117,144	117,501	97,592	90,512	75,264	78,765	63,402	64,588	58,578		
Forecast		111,444	111,997	112,549		96,612	102,712	108,813		64,987	65,385	65,784



**Forecasting Method:** Base Year (Orders to Active Meters)

Forecast method recognizes a declining trend in service order volumes for this order type. Factors outside the company's control, such as weather and customer comfort levels, may impact order volumes in the future.

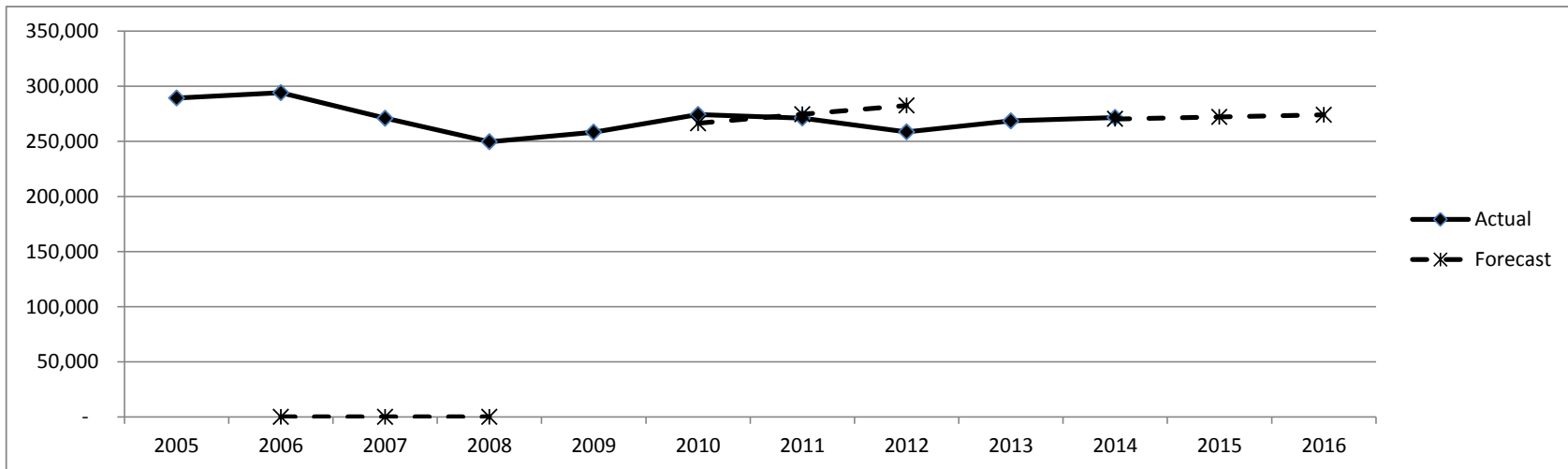
## Gas Leak - CSO Leak

**Source** Customer Work  
**Order Group** Gas Leak  
**Order Type** CSO Leak

**Description:** This order type is used when a customer reports the smell of gas and requests an investigation. The field technician identifies the source of the leakage and makes repairs when possible, or isolates and leaves the gas off pending completion of needed repairs.

Historical Averages	
5-Yr Avg	266,137
4-Yr Avg	268,106
3-Yr Avg	266,033

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	289,165	294,199	270,925	249,561	258,260	274,327	271,151	258,472	268,475	271,605		
Forecast		-	-	-		266,365	274,470	282,575		270,325	272,175	274,026



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are driven by external factors, such as leakage at customers' appliances, reports of area odors and earthquakes, which are outside the company's control.

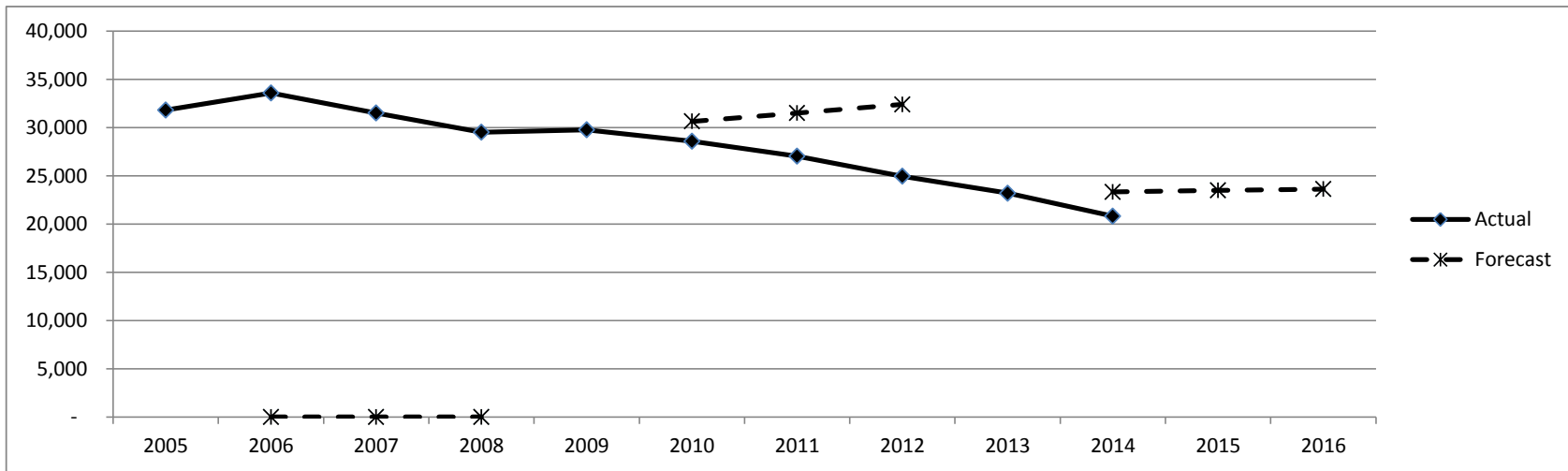
## Gas Leak - Pilot Out Only

**Source** Customer Work  
**Order Group** Gas Leak  
**Order Type** Pilot Out Only

**Description:** This order type is used when a customer reports a leak at a gas appliance and requests service. Upon inspection, the field technician determines the cause of the leak is a pilot light outage.

Historical Averages	
5-Yr Avg	26,705
4-Yr Avg	25,939
3-Yr Avg	25,060

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	31,803	33,583	31,499	29,519	29,770	28,576	27,023	24,963	23,194	20,822		
Forecast		-	-	-		30,644	31,517	32,391		23,337	23,480	23,623



**Forecasting Method:** Base Yr + Growth

Forecast method recognizes a declining trend in service order volumes for this order type. Factors outside the company's control may cause order volumes to increase in the future.



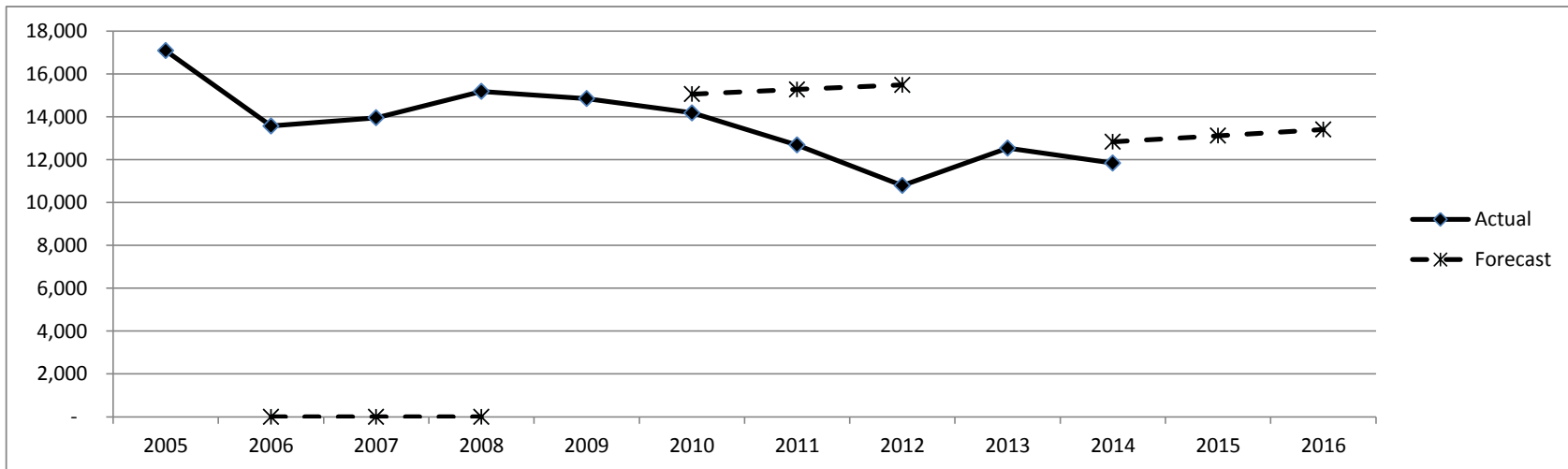
### Gas Leak - Leak Investigation (Step2)

Source Customer Work  
 Order Group Gas Leak  
 Order Type Leak Investigation (Step2)

**Description:** A gas leak becomes a Step 2 investigation when the cause of the odor cannot be determined with 100% certainty without checking the customer's houseline for leakage. The field technician shuts off all gas appliances so that gas flow can be checked at the meter. Underground samples are also taken to determine if there is a leak on company facilities.

Historical Averages	
5-Yr Avg	13,013
4-Yr Avg	12,553
3-Yr Avg	12,009

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	17,090	13,572	13,959	15,190	14,853	14,184	12,686	10,797	12,543	11,841		
Forecast		-	-	-		15,065	15,276	15,488		12,831	13,120	13,408



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are driven by external factors, such as leakage at customers' appliances, reports of area odors and earthquakes, which are outside the company's control.

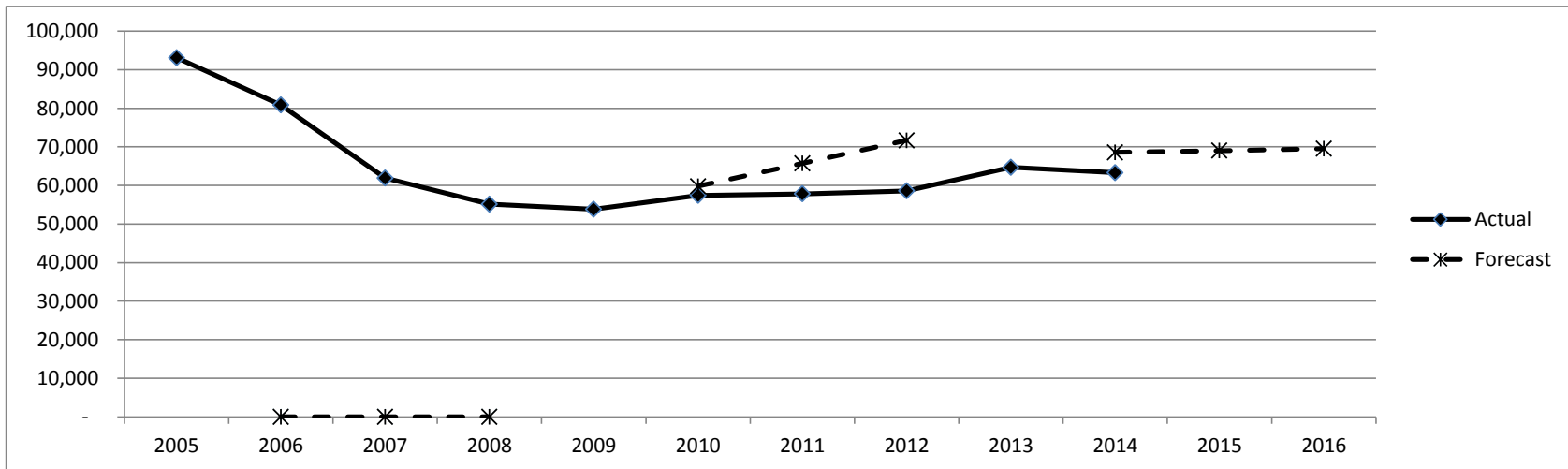
## Fumigation - Turn On

**Source** Customer Work  
**Order Group** Fumigation  
**Order Type** Turn On

**Description:** This order type is used when a customer requests that gas service be restored after it was shut off for fumigation.

Historical Averages	
5-Yr Avg	58,472
4-Yr Avg	59,630
3-Yr Avg	60,371

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	93,104	80,824	61,942	55,163	53,839	57,406	57,822	58,601	64,691	63,315		
Forecast		-	-	-		59,783	65,726	71,670		68,572	69,008	69,529



**Forecasting Method:** Base Yr + 6% in '14 then Growth 15-16

Pest Control Operators of California (PCOC) forecasts a fumigation growth rate of 6% in 2014.

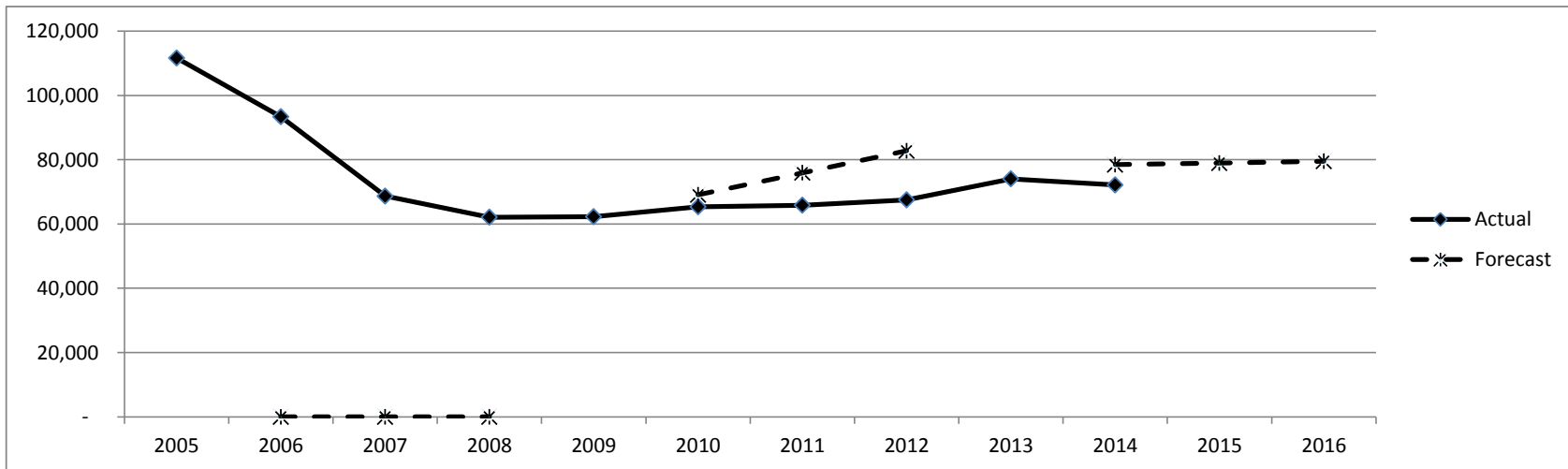
## Fumigation - Close

**Source** Customer Work  
**Order Group** Fumigation  
**Order Type** Close

**Description:** This order type is used when a customer's property is scheduled for fumigation and the customer requests that gas service be closed and secured in preparation for the fumigation. The field technician shuts off gas service to the premise.

Historical Averages	
5-Yr Avg	66,985
4-Yr Avg	68,163
3-Yr Avg	69,095

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	111,651	93,351	68,673	62,085	62,273	65,367	65,812	67,458	74,014	72,150		
Forecast		-	-	-		69,095	75,916	82,738		78,455	78,953	79,549



**Forecasting Method:** Base Yr + 6% in '14 then Growth 15-16

Pest Control Operators of California (PCOC) forecasts a fumigation growth rate of 6% in 2014.

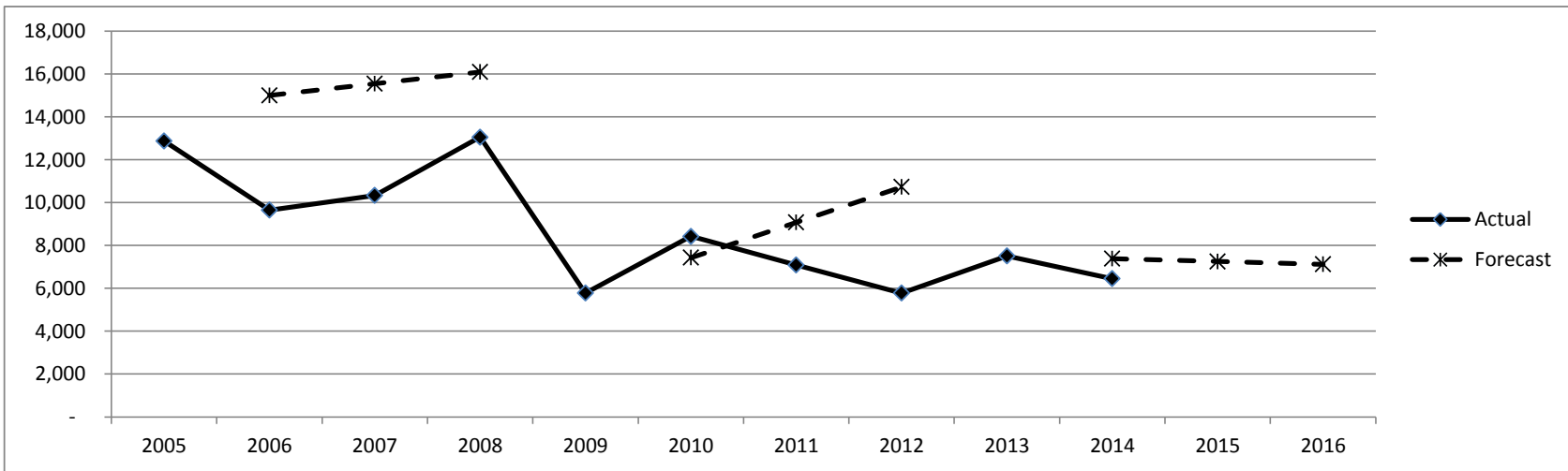
## HBI - Entered

**Source** Customer Work  
**Order Group** HBI  
**Order Type** Entered

**Description:** This order type is used when a customer requests that a service technician be sent to the customer's premise to investigate the cause of a high bill.

Historical Averages	
5-Yr Avg	6,917
4-Yr Avg	7,201
3-Yr Avg	6,793

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	12,873	9,646	10,332	13,054	5,780	8,425	7,084	5,779	7,515	6,449		
Forecast		14,999	15,547	16,095		7,430	9,080	10,730		7,384	7,252	7,121



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are driven by external factors, such as weather (consumption), commodity prices and economic conditions, which are outside the company's control.

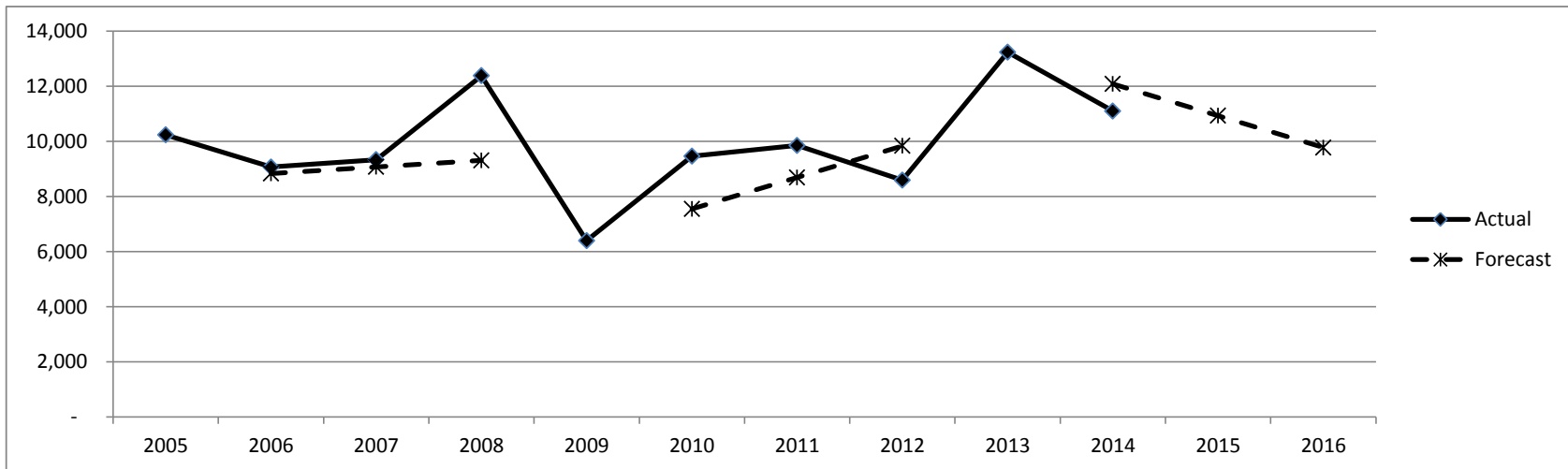
## HBI - Not Entered

**Source** Customer Work  
**Order Group** HBI  
**Order Type** Not Entered

**Description:** This is where the customer has requested a service visit to review the cause of a high bill. The explanation for the bill is determined without entering the home.

Historical Averages	
5-Yr Avg	9,508
4-Yr Avg	10,286
3-Yr Avg	10,561

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	10,238	9,065	9,335	12,380	6,398	9,462	9,853	8,594	13,235	11,099		
Forecast		8,835	9,071	9,308		7,544	8,690	9,835		12,082	10,929	9,776



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are driven by external factors, such as weather (consumption), commodity prices and economic conditions, which are outside the company's control.

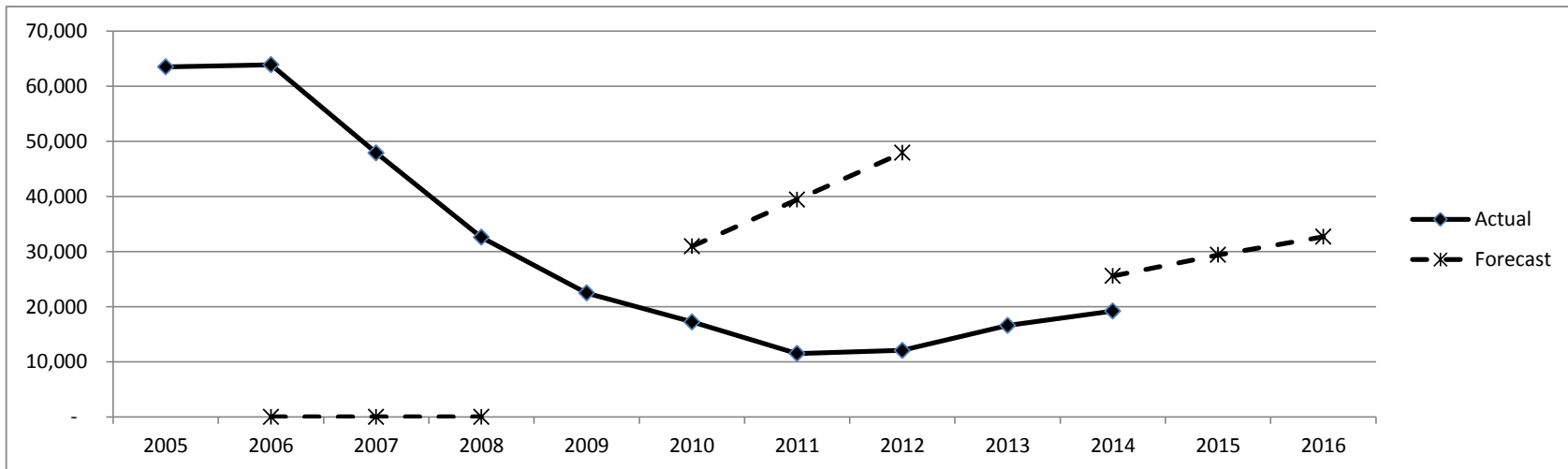
## Meter Work (Capital) - Meter Set - Turn On

**Source** Customer Work  
**Order Group** Meter Work (Capital)  
**Order Type** Meter Set - Turn On

**Description:** This order type is used when a new gas meter is installed at a customer's premise. Gas service is established and the field technician enters the property to service all the gas appliances.

Historical Averages	
5-Yr Avg	15,959
4-Yr Avg	14,331
3-Yr Avg	13,369

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	63,497	63,912	47,910	32,587	22,473	17,216	11,488	12,047	16,571	19,180		
Forecast		-	-	-		30,957	39,440	47,924		25,556	29,380	32,697



**Forecasting Method:** Follows capital Forecast

Volumes are driven by the forecasted growth in new business capital construction and associated meter sets.

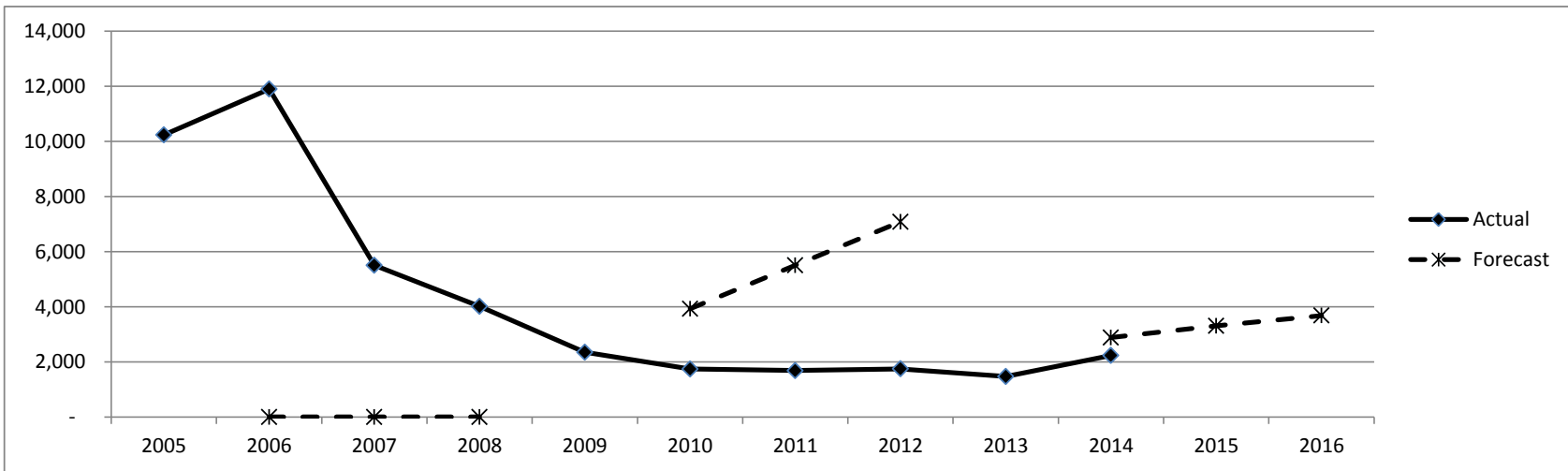
### Meter Work (Capital) - Meter Set - Left Off

**Source** Customer Work  
**Order Group** Meter Work (Capital)  
**Order Type** Meter Set - Left Off

**Description:** This order type is used when a new gas meter is installed on a customer's premise and the service valve is left off because access to the appliances is not available.

Historical Averages	
5-Yr Avg	1,796
4-Yr Avg	1,659
3-Yr Avg	1,632

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	10,234	11,898	5,507	4,010	2,346	1,741	1,683	1,745	1,467	2,230		
Forecast		-	-	-		3,925	5,504	7,083		2,877	3,307	3,681



**Forecasting Method:** Follows capital Forecast

Volumes are driven by the forecasted growth in new business capital construction and associated meter sets.

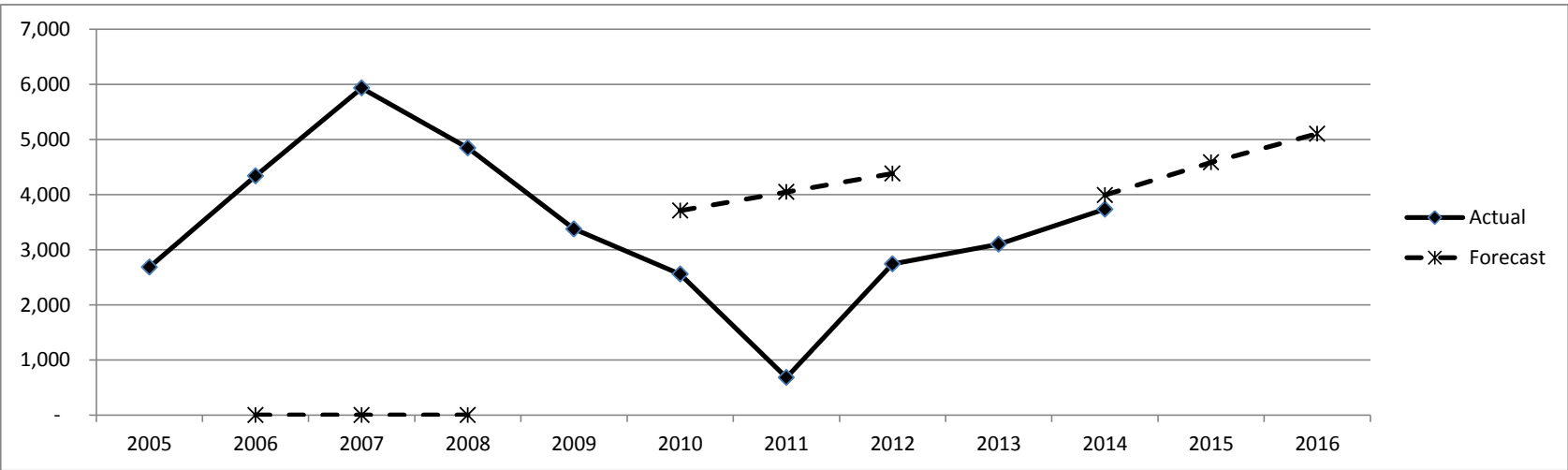
### Meter Work (Capital) - Meter Set (PSI)

Source Customer Work  
 Order Group Meter Work (Capital)  
 Order Type Meter Set (PSI)

**Description:** This is order type is used when a new gas meter is installed at a customer's premise and higher-than-standard gas pressure (e.g., 2 PSI, or pounds per square inch) is provided.

Historical Averages	
5-Yr Avg	2,490
4-Yr Avg	2,270
3-Yr Avg	2,173

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	2,682	4,340	5,934	4,846	3,374	2,558	679	2,741	3,100	3,734		
Forecast		-	-	-		3,711	4,048	4,384		3,989	4,586	5,104



**Forecasting Method:** Follows capital Forecast

Follows capital forecast and growth in new meter set work.



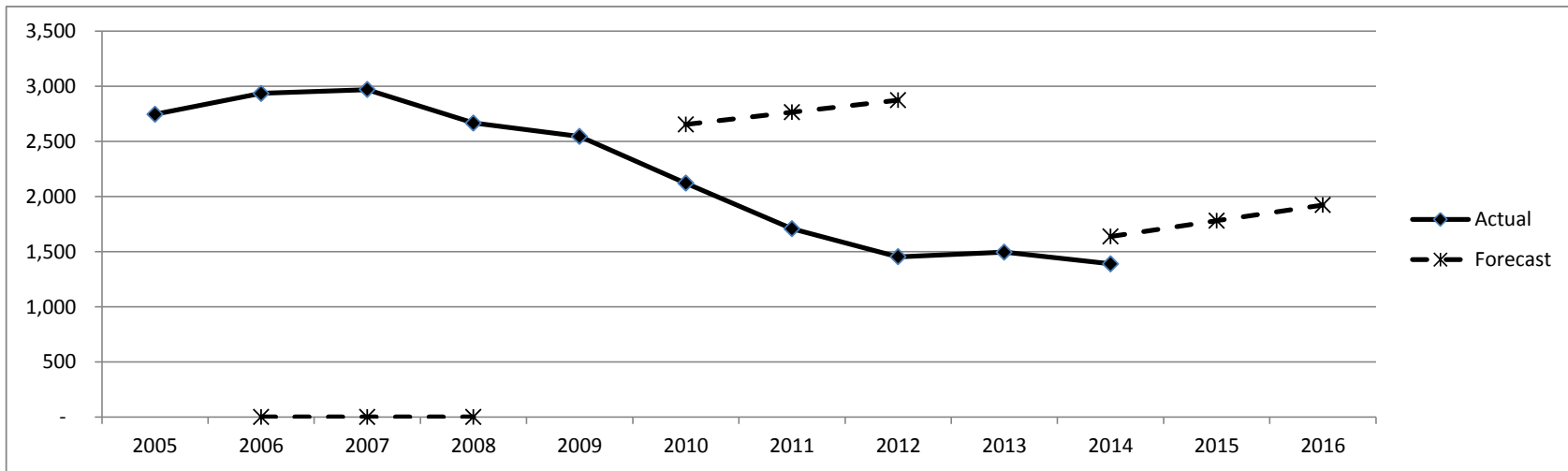
### Meter Work (O&M) - Meter Reset - Turn On

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Reset - Turn On

**Description:** This order type is used when a gas meter is installed at an existing facility where the gas meter had previously been removed due to non-use. Gas service is re-established and the field technician enters the property to service all the gas appliances.

Historical Averages	
5-Yr Avg	1,864
4-Yr Avg	1,694
3-Yr Avg	1,552

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	2,745	2,935	2,969	2,666	2,544	2,121	1,708	1,453	1,495	1,388		
Forecast		-	-	-		2,654	2,764	2,874		1,638	1,780	1,923



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control.

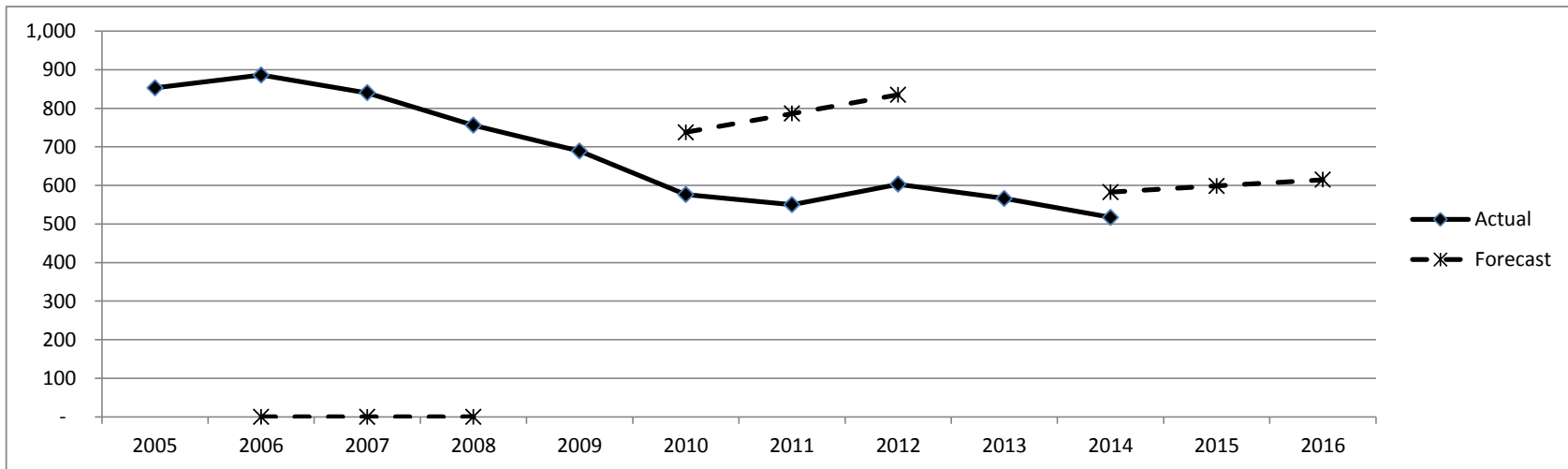
## Meter Work (O&M) - Meter Reset - Left Off

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Reset - Left Off

**Description:** This order type is used when a gas meter is installed at an existing facility where the gas meter had previously been removed due to non-use. Due to appliance inaccessibility, the field technician installs the meter, leaves the service off, and secures the gas valve.

Historical Averages	
5-Yr Avg	597
4-Yr Avg	574
3-Yr Avg	573

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	853	886	840	756	689	576	550	603	566	517		
Forecast		-	-	-		738	786	835		582	599	615



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control.

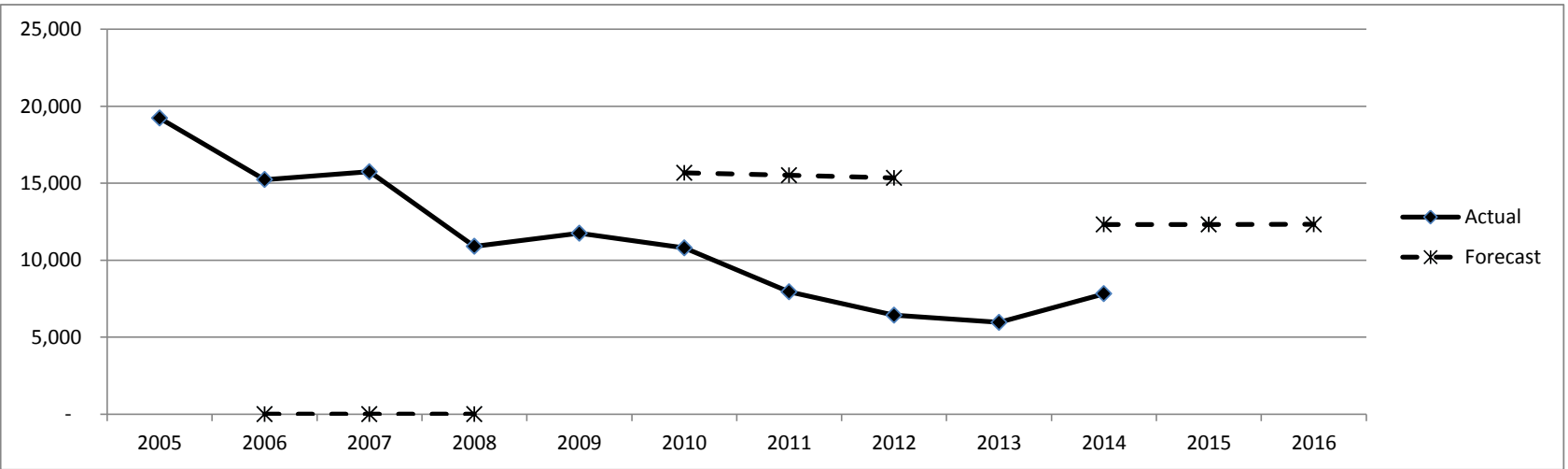
### Meter Work (O&M) - Meter Change (Entered)

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Change (Entered)

**Description:** This order type is used when a gas meter is replaced and gas service is interrupted during the meter change. The field technician enters the property and services the gas appliances to restore gas service.

Historical Averages	
5-Yr Avg	8,575
4-Yr Avg	7,783
3-Yr Avg	6,777

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	19,228	15,233	15,739	10,900	11,741	10,802	7,949	6,423	5,958	7,815		
Forecast		-	-	-		15,675	15,507	15,339		12,314	12,318	12,322



**Forecasting Method:** 180K per year total for all Meter Changes

Annual meter replacements adopted in D. 08-07-046 and projected for TY 2016.

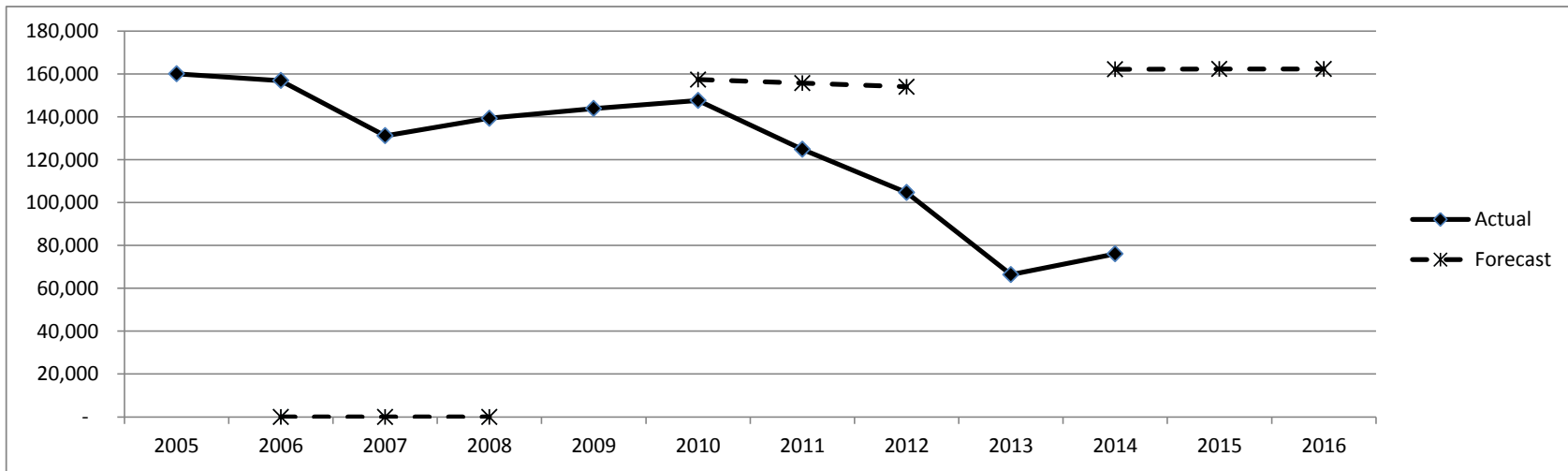
### Meter Work (O&M) - Meter Change (Not Entered)

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Change (Not Entered)

**Description:** This order type is used when a gas meter is replaced. The field technician does not need to enter the property to service the appliances because a bypass is used during the meter change, enabling gas to remain on during the meter change, therefore not interrupting the customer's gas service.

Historical Averages	
5-Yr Avg	117,514
4-Yr Avg	110,916
3-Yr Avg	98,669

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	160,071	156,935	131,174	139,324	143,908	147,658	124,886	104,677	66,443	76,125		
Forecast		-	-	-		157,400	155,709	154,019		162,245	162,298	162,352



**Forecasting Method:** 180K per year total for all Meter Changes

Annual meter replacements adopted in D. 08-07-046 and projected for TY 2016.

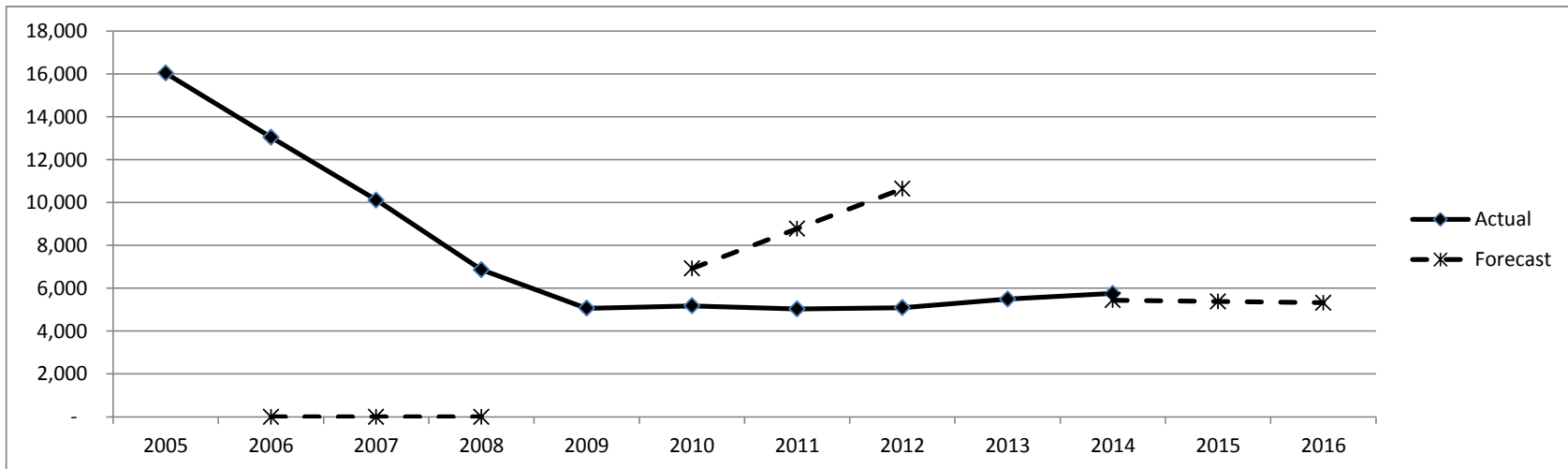
### Meter Work (O&M) - Meter Change (Size)

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Change (Size)

**Description:** This order type is used when a customer's gas end uses necessitate a larger gas meter.

Historical Averages	
5-Yr Avg	5,174
4-Yr Avg	5,201
3-Yr Avg	5,208

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	16,041	13,046	10,116	6,858	5,066	5,179	5,029	5,096	5,498	5,762		
Forecast		-	-	-		6,925	8,783	10,642		5,441	5,383	5,326



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as economic conditions and customer appliance/equipment additions, which are outside the company's control.

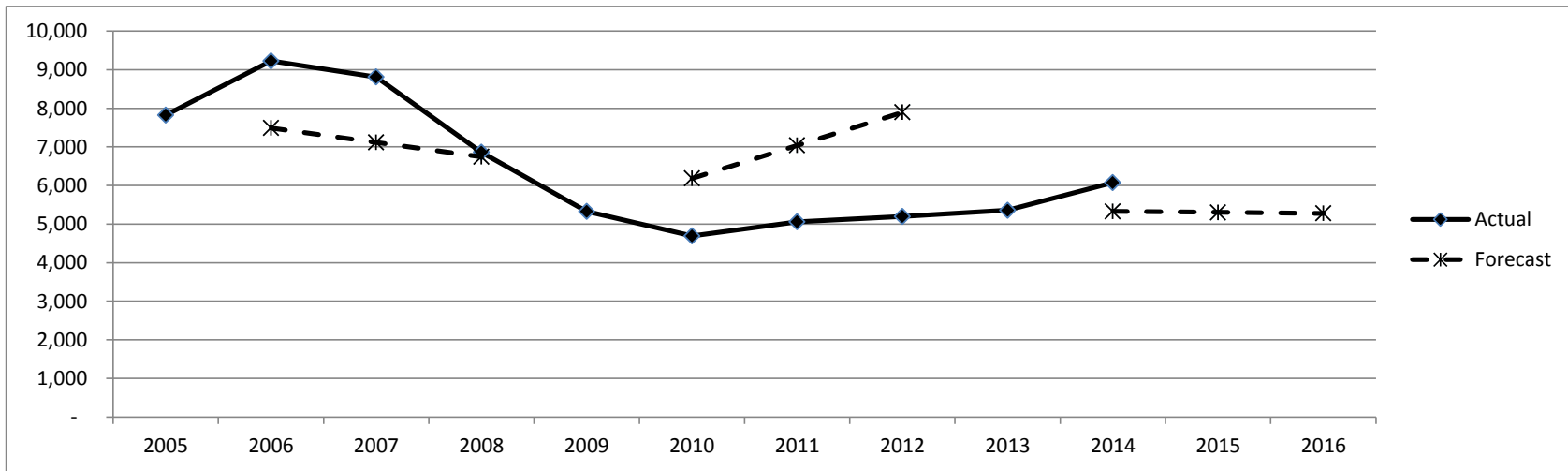
### Meter Work (O&M) - Meter Remove

**Source** Customer Work  
**Order Group** Meter Work (O&M)  
**Order Type** Meter Remove

**Description:** This order type is used when a gas meter is removed from a customer's property for any reason.

Historical Averages	
5-Yr Avg	5,124
4-Yr Avg	5,074
3-Yr Avg	5,203

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	7,820	9,228	8,809	6,859	5,325	4,688	5,059	5,193	5,356	6,071		
Forecast		7,490	7,117	6,745		6,182	7,038	7,895		5,329	5,302	5,276



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy, which are outside the company's control.

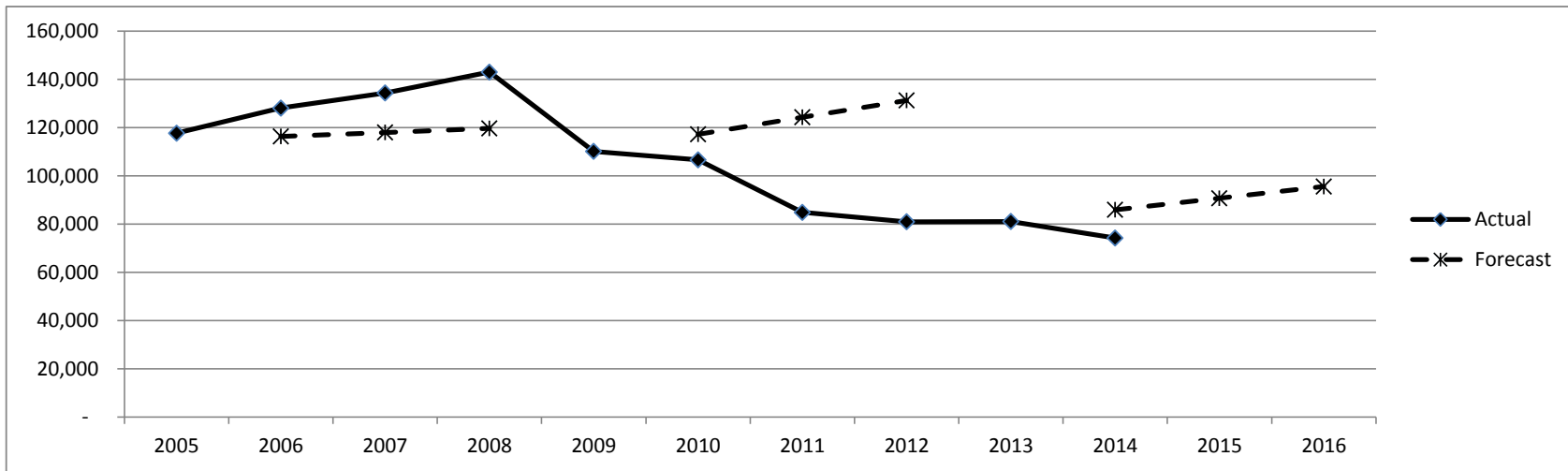
## NonPay Turn On - Turn On

**Source** Customer Work  
**Order Group** NonPay Turn On  
**Order Type** Turn On

**Description:** This order type is used when a customer's gas service was shut off for nonpayment and the customer requests service re-activation following payment of their bill. The field technician services the customer's gas appliances and restores gas service.

Historical Averages	
5-Yr Avg	92,695
4-Yr Avg	88,326
3-Yr Avg	82,239

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	117,657	128,068	134,333	142,990	110,172	106,589	84,833	80,872	81,011	74,160		
Forecast		116,344	117,973	119,624		117,202	124,231	131,261		85,855	90,700	95,544



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customers' ability to pay their bills, which are outside the company's control.

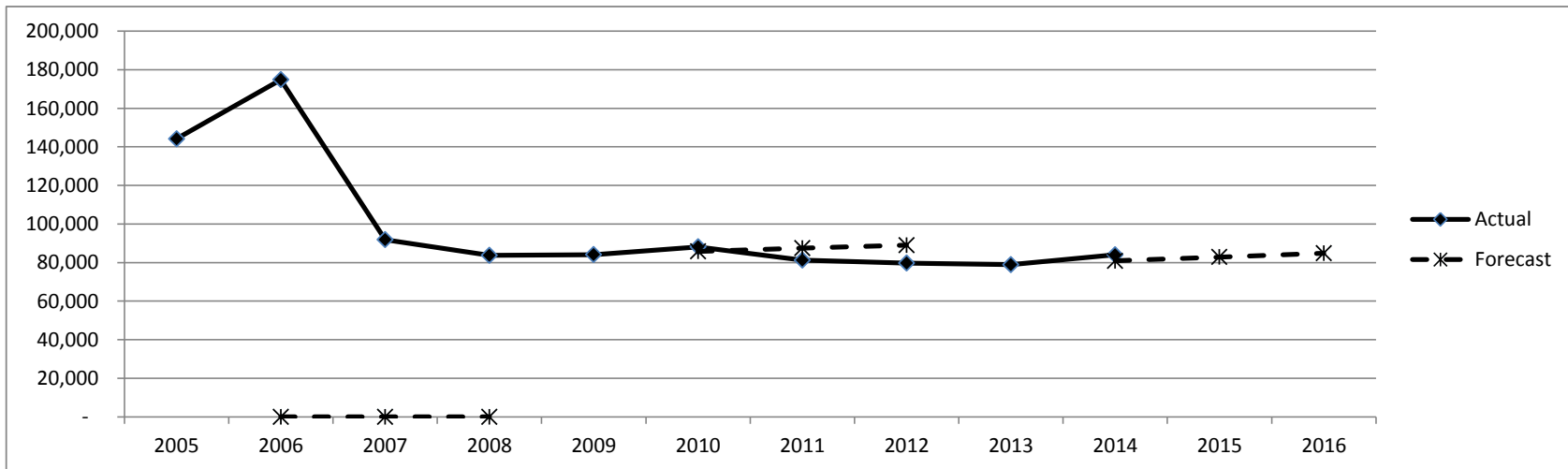
## Read/Verify - Verify

**Source** Customer Work  
**Order Group** Read/Verify  
**Order Type** Verify

**Description:** This order type is used when a field technician is asked to collect additional data at a customer premise, typically as a result of billing data abnormalities.

Historical Averages	
5-Yr Avg	82,395
4-Yr Avg	81,968
3-Yr Avg	79,924

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	144,096	174,780	91,859	83,685	84,105	88,098	81,186	79,694	78,893	83,969		
Forecast		-	-	-		85,750	87,396	89,041		80,882	82,872	84,861



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes are driven by billing abnormalities, which fluctuate from year to year.



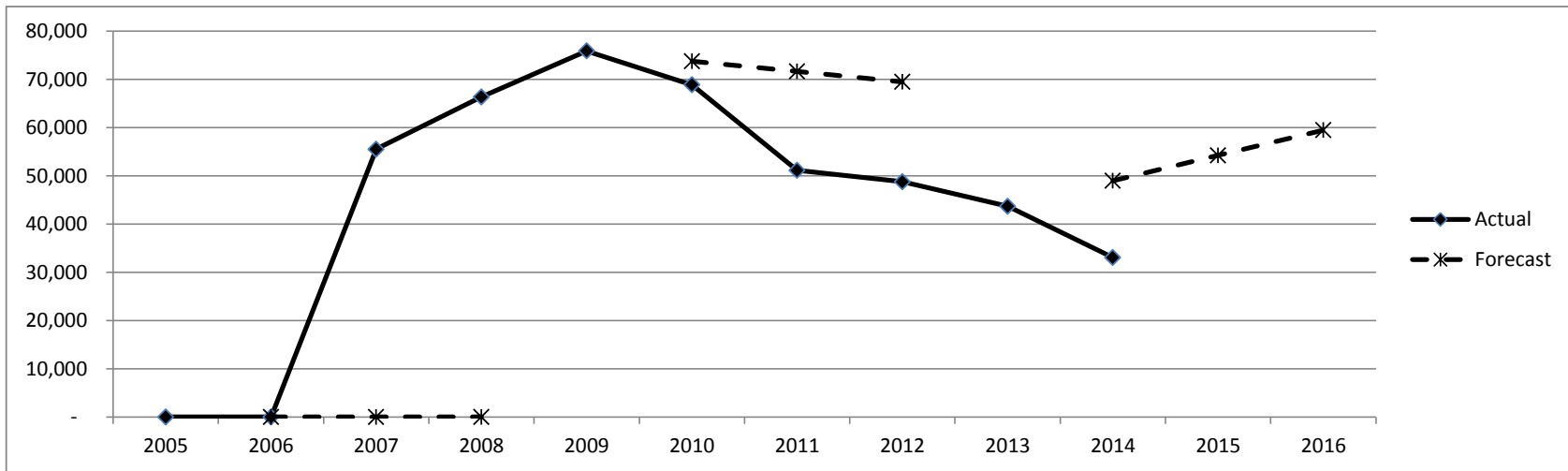
### Read/Verify - Verify - Soft Close

**Source** Customer Work  
**Order Group** Read/Verify  
**Order Type** Verify - Soft Close

**Description:** This is a system-generated work order behind a soft-closed account. The order is generated when gas usage is expected to exceed 30 CCF. A field technician hard closes gas service at the meter.

Historical Averages	
5-Yr Avg	57,672
4-Yr Avg	53,118
3-Yr Avg	47,871

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	-	-	55,524	66,345	75,890	68,859	51,157	48,766	43,690	33,044		
Forecast		-	-	-		73,759	71,629	69,498		48,954	54,218	59,482



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control.

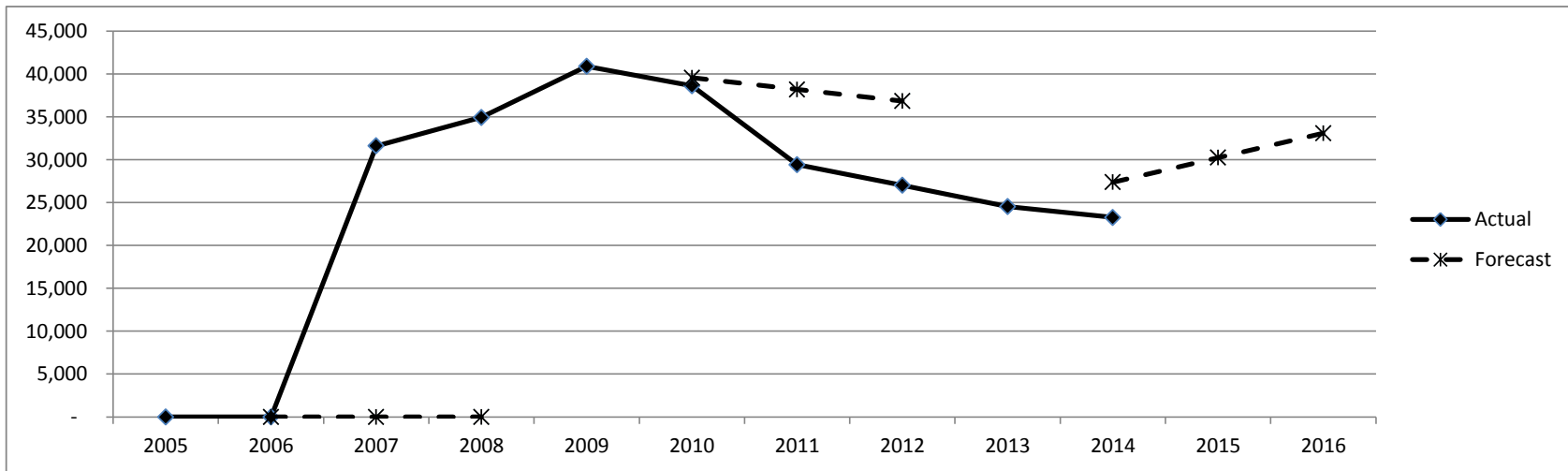
### Read/Verify - Verify - Soft Close - 180 Days

**Source** Customer Work  
**Order Group** Read/Verify  
**Order Type** Verify - Soft Close - 180 Days

**Description:** This is a system-generated work order behind a soft-closed account. The order is generated when the account has been in "soft close" status for 180 days without a new occupant. The field technician hard closes gas service at the meter.

Historical Averages	
5-Yr Avg	32,097
4-Yr Avg	29,895
3-Yr Avg	26,989

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	-	-	31,613	34,936	40,907	38,611	29,418	27,028	24,522	23,268		
Forecast		-	-	-		39,550	38,193	36,836		27,382	30,241	33,101



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control.

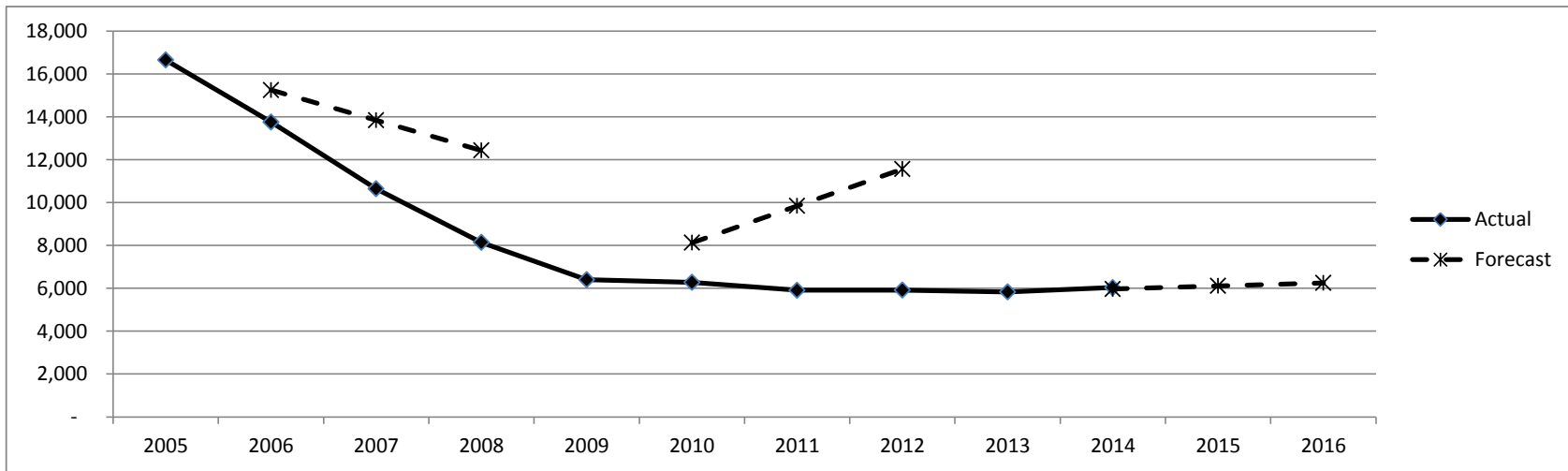
### Read/Verify - Load Survey - Res

**Source** Customer Work  
**Order Group** Read/Verify  
**Order Type** Load Survey - Res

**Description:** This order type is used when a field technician conducts a load survey of a customer's gas appliances to determine the potential load when the appliances are in use. The load survey results are used to properly size a new gas meter.

Historical Averages	
5-Yr Avg	6,069
4-Yr Avg	5,985
3-Yr Avg	5,885

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	16,653	13,756	10,642	8,140	6,409	6,282	5,910	5,912	5,834	6,034		
Forecast		15,247	13,841	12,436		8,128	9,848	11,567		5,973	6,112	6,251



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control.

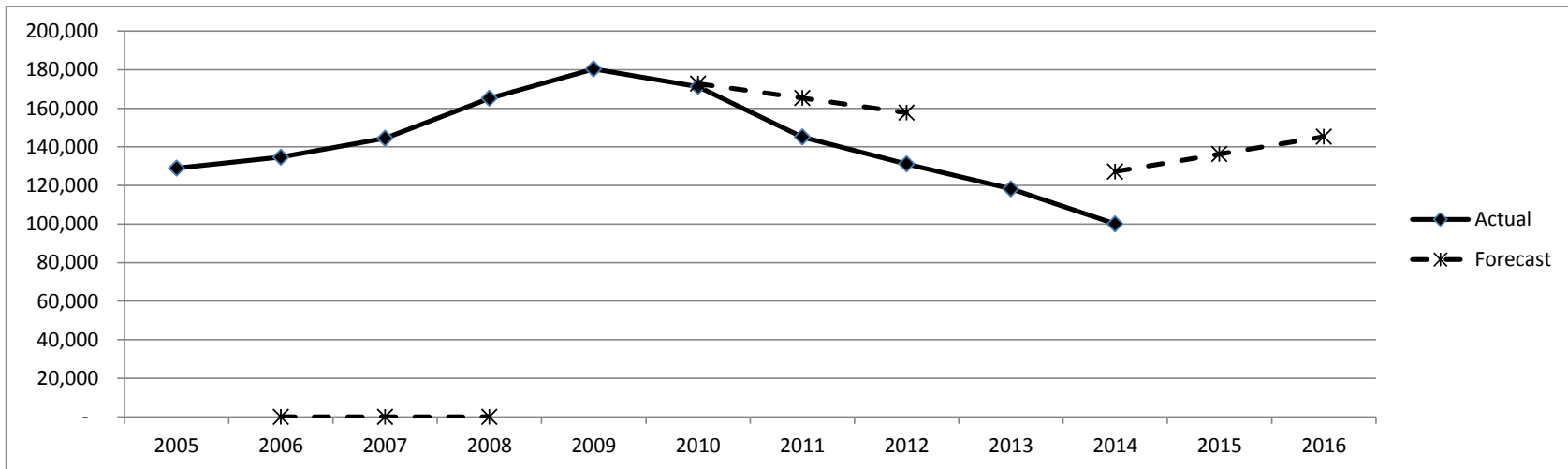
### TurnOn/ShutOff - Turn On (Entered)

**Source** Customer Work  
**Order Group** TurnOn/ShutOff  
**Order Type** Turn On (Entered)

**Description:** This order type is used when a new customer account is established and the gas is off. The field technician reads the meter, checks to ensure gas flow is normal and services all gas appliances.

Historical Averages	
5-Yr Avg	149,188
4-Yr Avg	141,405
3-Yr Avg	131,453

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	128,877	134,653	144,419	165,193	180,320	171,262	145,088	131,103	118,167	100,057		
Forecast		-	-	-		172,796	165,273	157,749		127,207	136,247	145,287



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly higher than normal due to economic conditions in the real estate market.

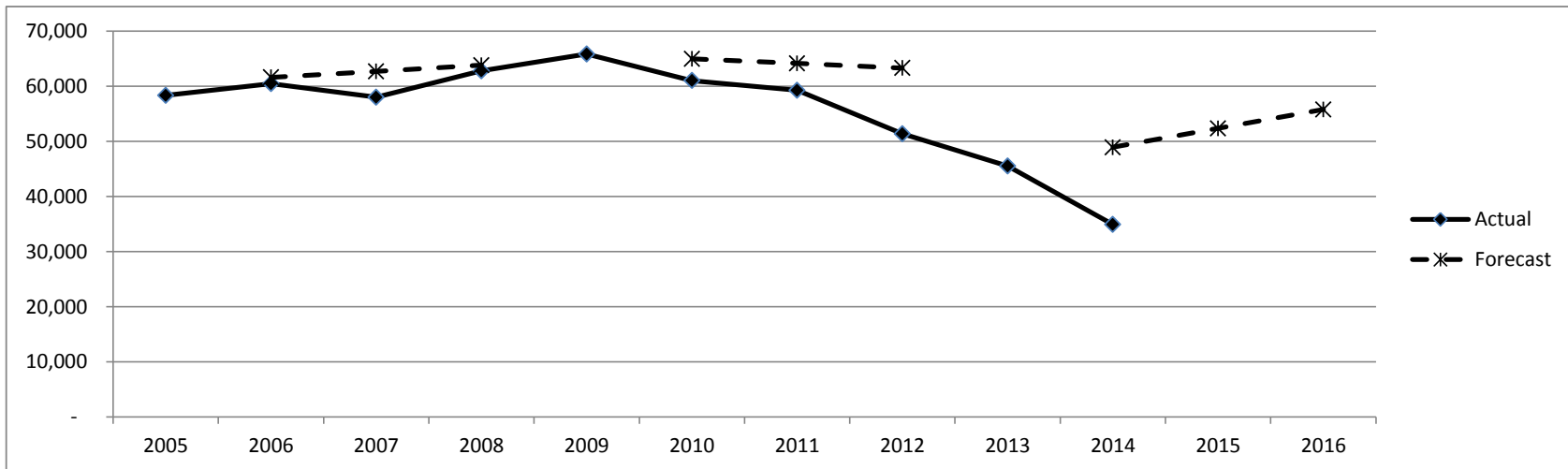
## TurnOn/ShutOff - Turn On Entered (Gas On)

**Source** Customer Work  
**Order Group** TurnOn/ShutOff  
**Order Type** Turn On Entered (Gas On)

**Description:** This order type is used when a new customer account is established, the gas is already on, and the customer requests a safety check on their gas appliances.

Historical Averages	
5-Yr Avg	56,597
4-Yr Avg	54,292
3-Yr Avg	52,046

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	58,357	60,474	57,989	62,798	65,818	61,031	59,260	51,382	45,495	34,921		
Forecast		61,621	62,713	63,805		64,981	64,144	63,307		48,921	52,348	55,774



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly higher than normal due to economic conditions in the real estate market.

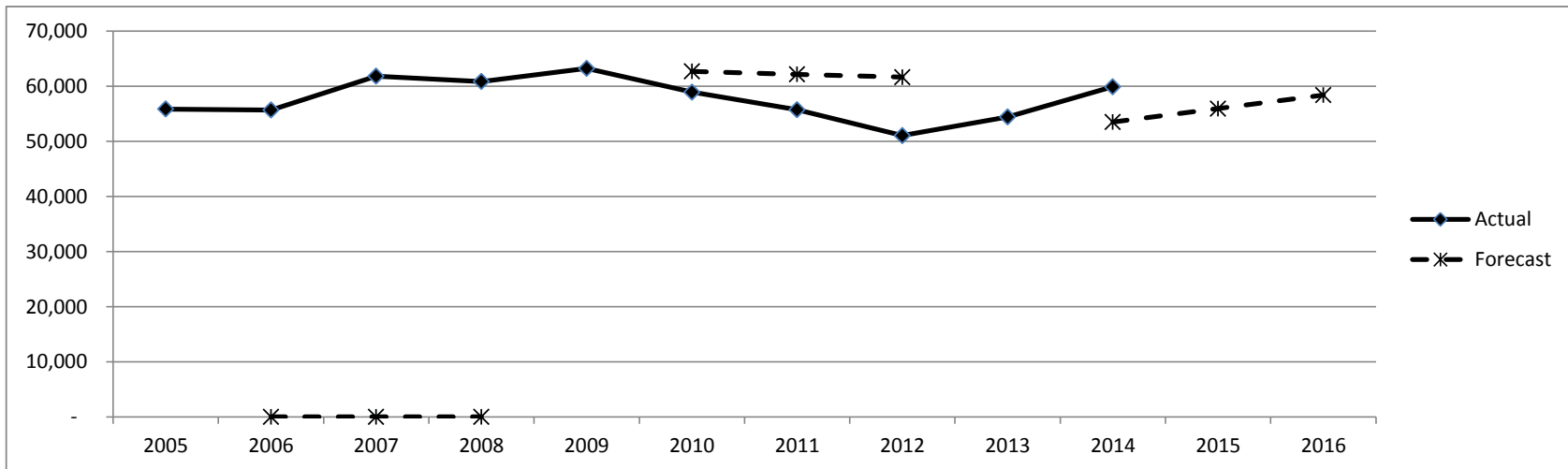
## TurnOn/ShutOff - Turn On (Back On/Restore)

**Source** Customer Work  
**Order Group** TurnOn/ShutOff  
**Order Type** Turn On (Back On/Restore)

**Description:** This order type is used when the gas has been shut off by the company or a third party. Repairs, if required, have been made; the field technician turns the gas on and services all gas appliances.

Historical Averages	
5-Yr Avg	56,670
4-Yr Avg	55,029
3-Yr Avg	53,730

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	55,851	55,657	61,807	60,850	63,236	58,926	55,714	51,053	54,423	59,905		
Forecast		-	-	-		62,701	62,167	61,632		53,496	55,939	58,382



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. 2013 order volume was adjusted to exclude orders caused by Advanced Meter implementation.

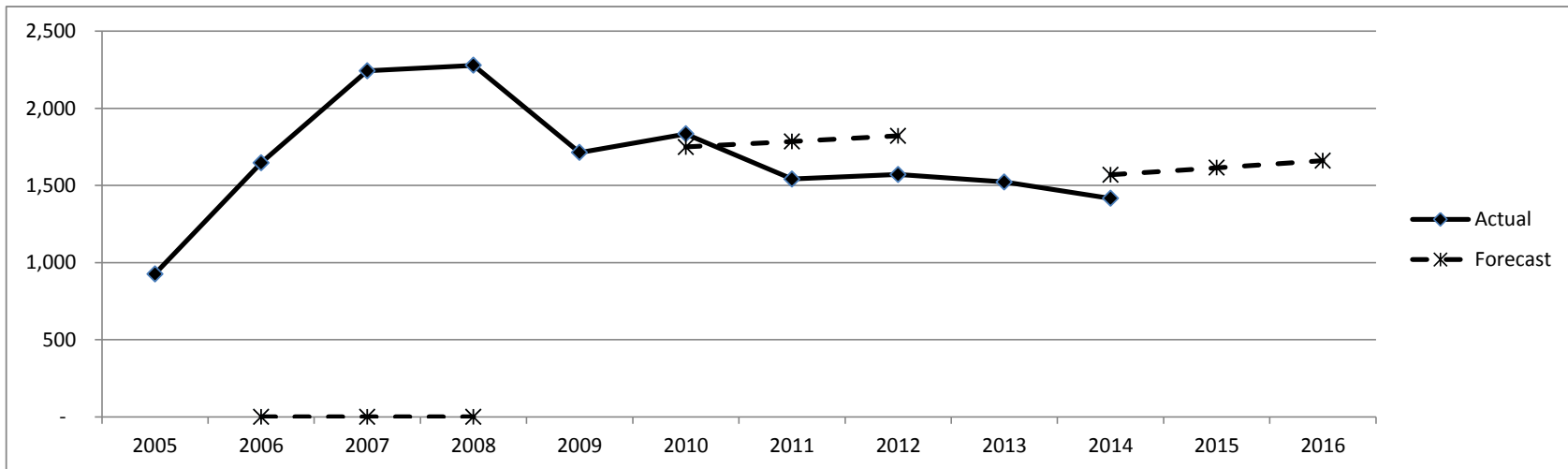
### TurnOn/ShutOff - Turn On (PSI)

**Source** Customer Work  
**Order Group** TurnOn/ShutOff  
**Order Type** Turn On (PSI)

**Description:** This order type is used when a new customer account is established, and the premise is served with higher-than-standard-pressure gas service. The field technician turns the gas service on and services all gas appliances.

Historical Averages	
5-Yr Avg	1,636
4-Yr Avg	1,617
3-Yr Avg	1,545

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	926	1,646	2,242	2,278	1,713	1,834	1,541	1,571	1,522	1,416		
Forecast		-	-	-		1,749	1,785	1,821		1,568	1,614	1,661



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly impacted by economic conditions in the real estate market.

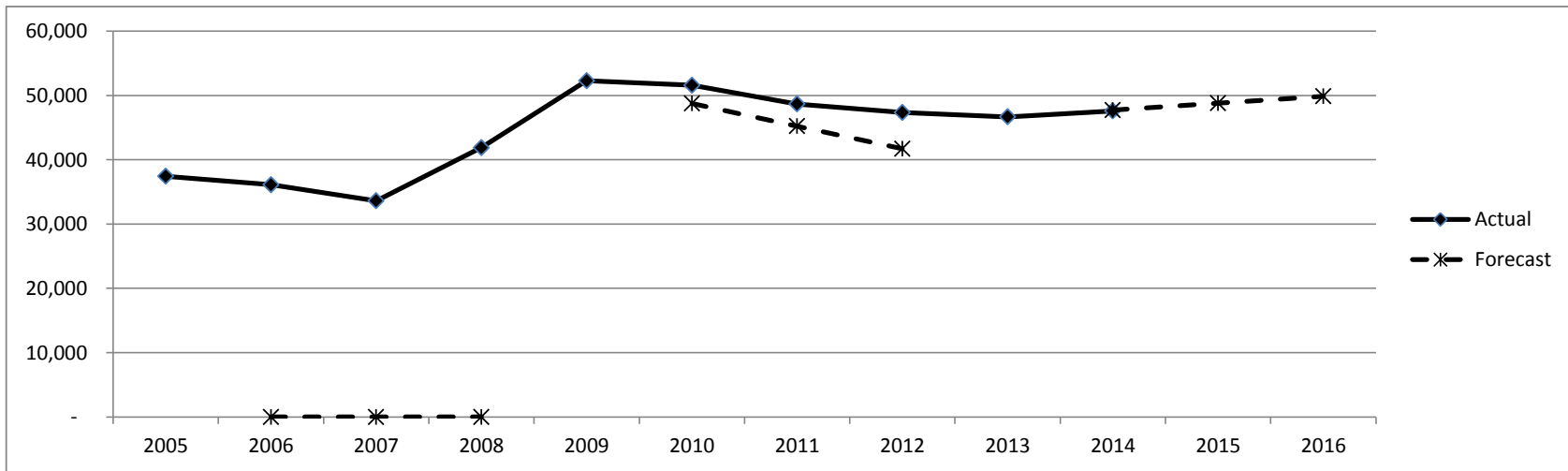
### TurnOn/ShutOff - Close (Hard)

**Source** Customer Work  
**Order Group** TurnOn/ShutOff  
**Order Type** Close (Hard)

**Description:** This order type is used when a customer requests that their account be closed and gas service be shut off. A field technician closes the gas valve at the meter and secures it with a locking device.

Historical Averages	
5-Yr Avg	49,304
4-Yr Avg	48,563
3-Yr Avg	47,552

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	37,444	36,107	33,617	41,883	52,268	51,596	48,658	47,330	46,669	47,605		
Forecast		-	-	-		48,746	45,225	41,703		47,735	48,801	49,867



**Forecasting Method:** 4-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as the state of the economy and customer turnover, which are outside the company's control. Excluded 2009 since order volumes were significantly impacted by economic conditions in the real estate market.



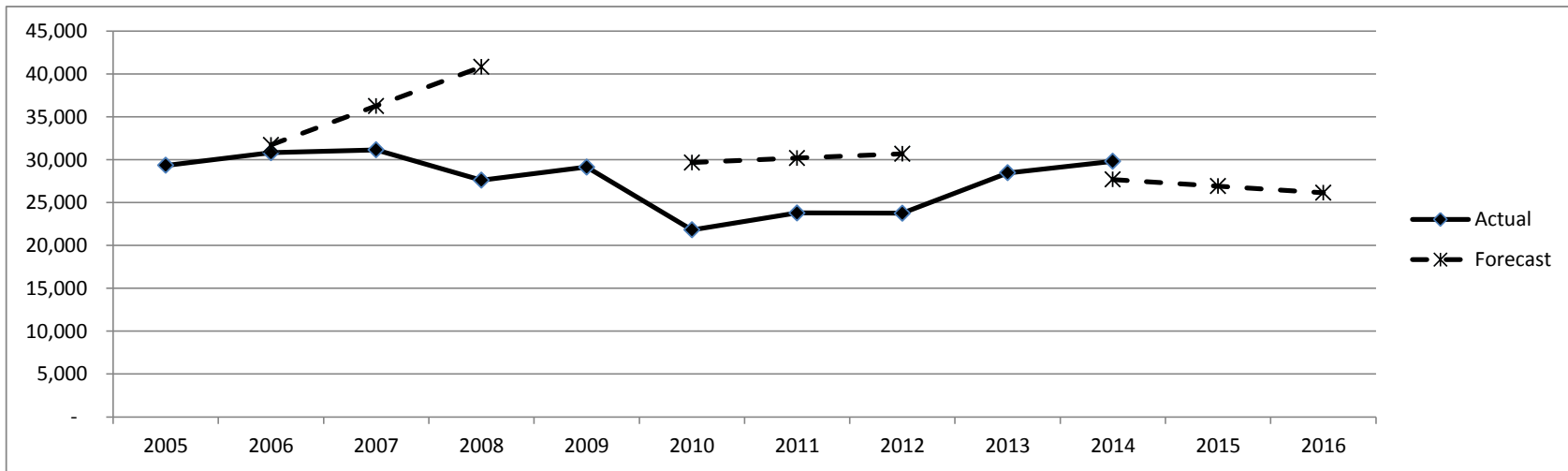
### Miscellaneous - Service Order (MSO)

**Source** Customer Work  
**Order Group** Miscellaneous  
**Order Type** Service Order (MSO)

**Description:** This is a miscellaneous service order to account for work at customer premises that does not fit within other order categories, including follow-up work resulting from other orders.

Historical Averages	
5-Yr Avg	25,397
4-Yr Avg	24,460
3-Yr Avg	25,339

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	29,339	30,817	31,151	27,618	29,144	21,821	23,796	23,753	28,469	29,806		
Forecast		31,729	36,275	40,820		29,664	30,184	30,704		27,696	26,923	26,151



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year since this is a miscellaneous order type.

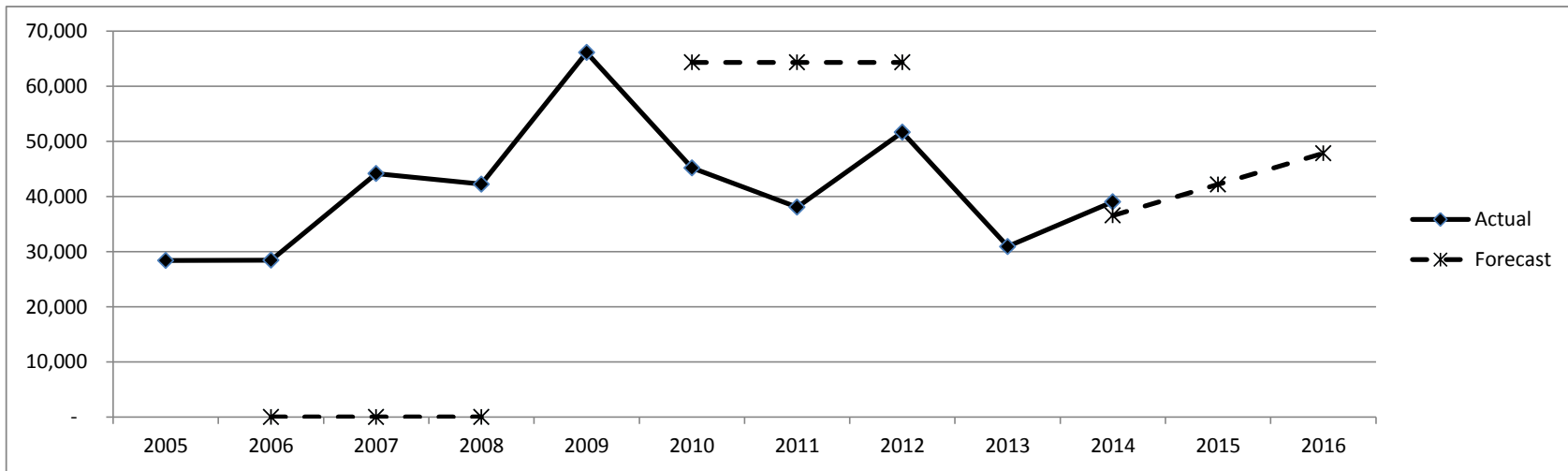
## Miscellaneous - Meter Reg (MMR)

**Source** Customer Work  
**Order Group** Miscellaneous  
**Order Type** Meter & Reg (MMR)

**Description:** This is a multi-purpose order issued to address and correct a variety of conditions found at the meter including corrosion.

Historical Averages	
5-Yr Avg	46,387
4-Yr Avg	41,453
3-Yr Avg	40,210

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	28,404	28,444	44,159	42,243	66,124	45,183	38,049	51,665	30,916	39,051		
Forecast		-	-	-		64,318	64,318	64,318		36,557	42,199	47,840



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, e.g., corrosion or hazardous conditions found at meters, which are outside the company's control.

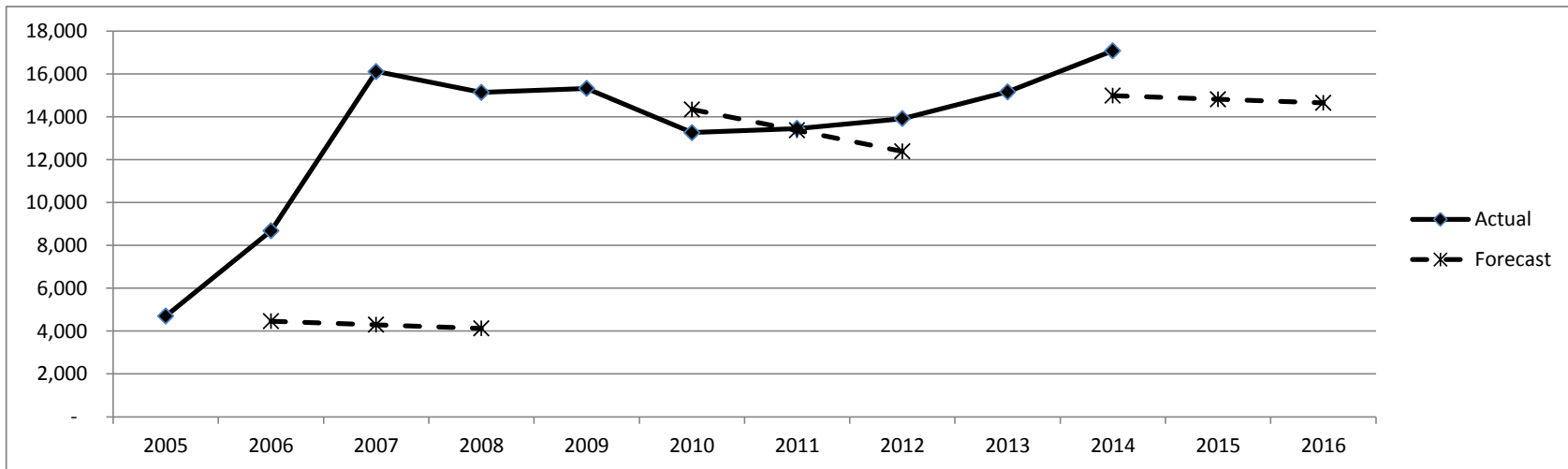
## Miscellaneous - Assist

Source Customer Work  
 Order Group *Miscellaneous*  
 Order Type *Assist*

**Description:** This order type is used when a field employee working an order requests assistance from another employee in order to complete the order, e.g., needs tools or parts, is concerned about their safety, etc.

Historical Averages	
5-Yr Avg	14,225
4-Yr Avg	13,950
3-Yr Avg	14,178

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	4,703	8,683	16,115	15,142	15,325	13,265	13,456	13,914	15,165	17,080		
Forecast		4,461	4,296	4,130		14,346	13,366	12,387		14,992	14,820	14,647



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year and are impacted by external factors, such as external work environment, which are outside the company's control.

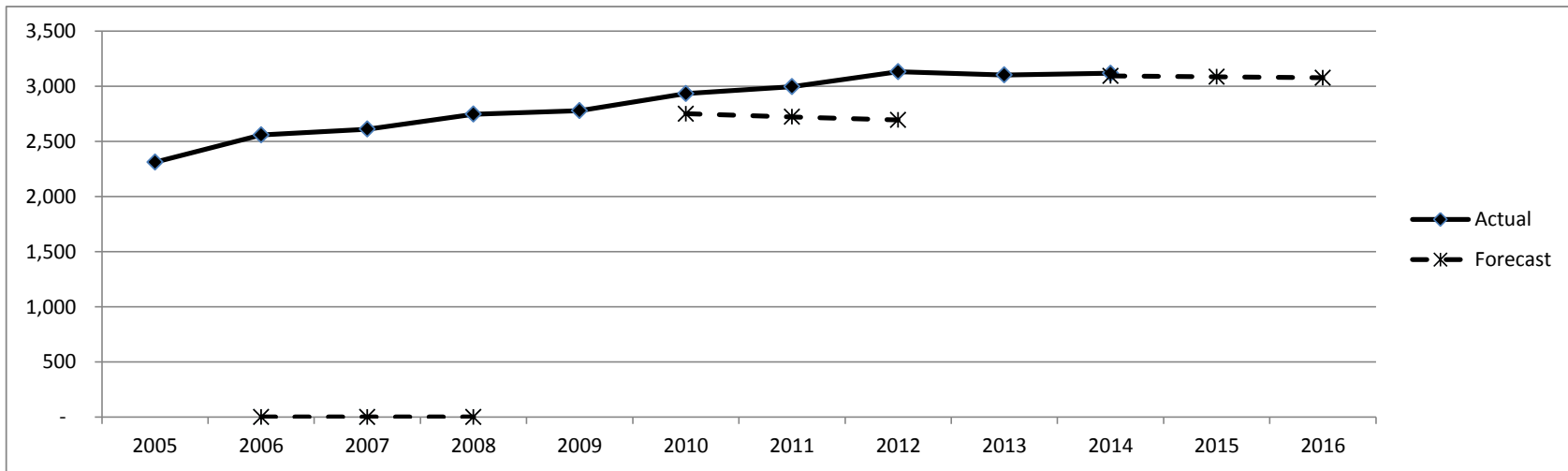
### Food Industry - Turn On (Entered)

**Source** Customer Work  
**Order Group** Food Industry  
**Order Type** Turn On (Entered)

**Description:** This order type is used when a customer has established an account but the gas is off. A commercial/industrial field technician turns the gas on and services all gas equipment.

Historical Averages	
5-Yr Avg	2,989
4-Yr Avg	3,041
3-Yr Avg	3,077

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	2,311	2,558	2,611	2,747	2,778	2,934	2,996	3,132	3,103	3,118		
Forecast		-	-	-		2,750	2,722	2,695		3,094	3,085	3,076



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the economy, customer turnover and other factors which are outside the company's control.

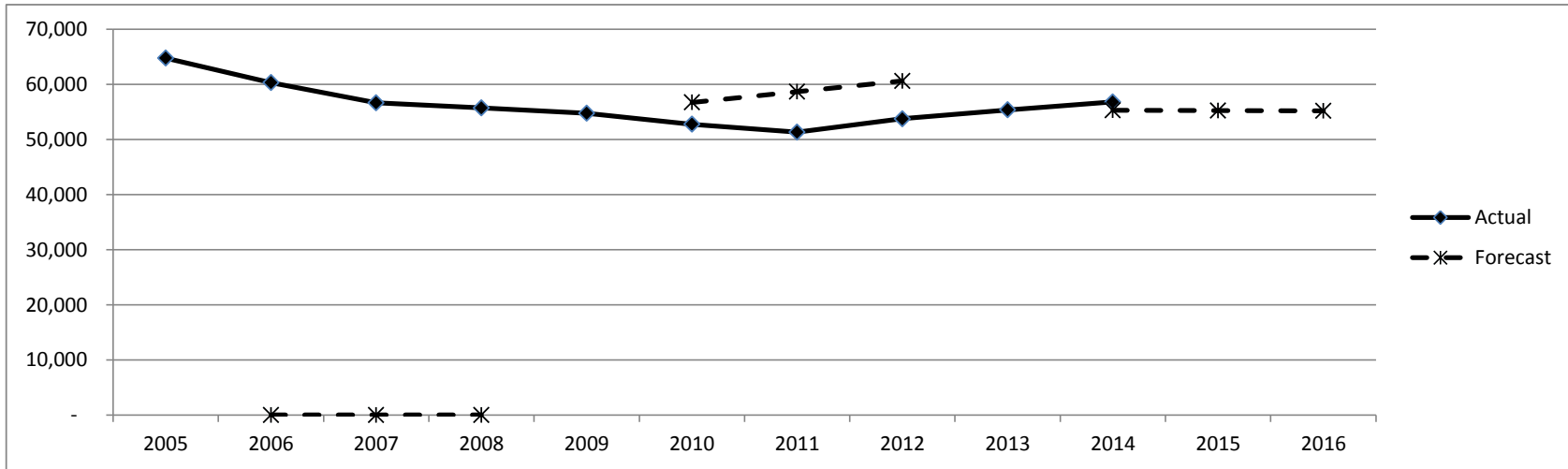
## Food Industry - CSO

**Source** Customer Work  
**Order Group** Food Industry  
**Order Type** CSO

**Description:** This order type is used when a food industry customer requests service on a piece of gas equipment.

Historical Averages	
5-Yr Avg	53,598
4-Yr Avg	53,304
3-Yr Avg	53,487

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	64,759	60,304	56,660	55,739	54,773	52,755	51,342	53,753	55,366	56,801		
Forecast		-	-	-		56,726	58,678	60,631		55,306	55,246	55,186



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the condition of customer equipment, malfunctioning of customers' gas equipment and other factors which are outside the company's control.

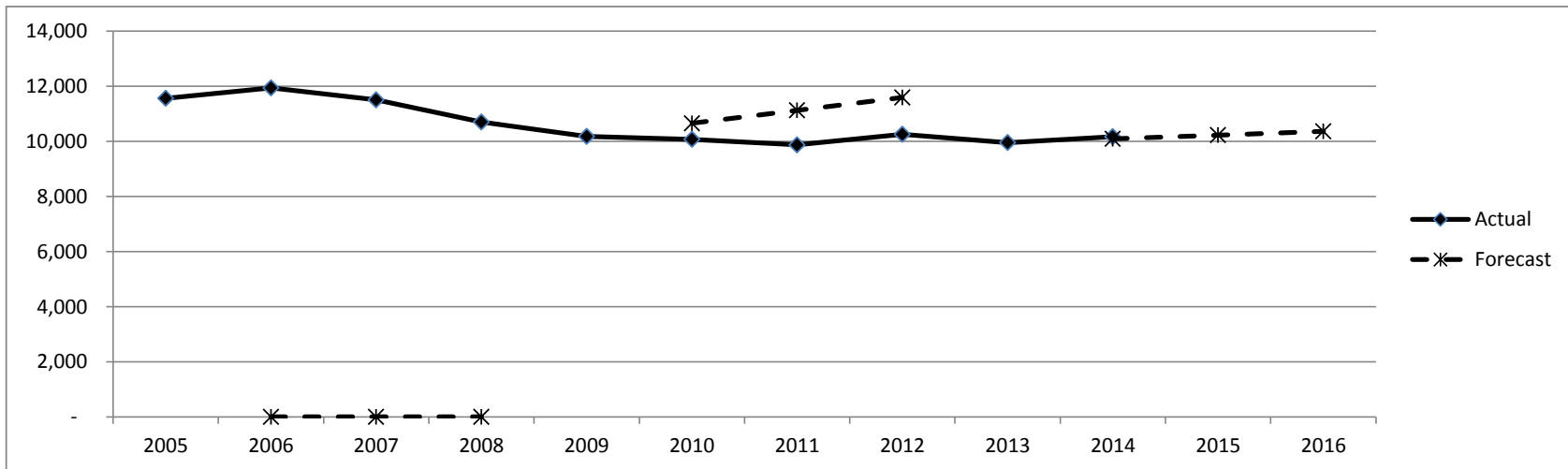
## Food Industry - CSO Leak

**Source** Customer Work  
**Order Group** Food Industry  
**Order Type** CSO Leak

**Description:** This order type is used when a food industry customer reports a potential gas leak at a piece of equipment. A commercial service technician investigates the source of the gas leak and makes needed repairs, if possible, or isolates the leak and shuts off gas service.

Historical Averages	
5-Yr Avg	10,065
4-Yr Avg	10,036
3-Yr Avg	10,026

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	11,562	11,942	11,508	10,704	10,182	10,068	9,870	10,257	9,950	10,167		
Forecast		-	-	-		10,653	11,124	11,595		10,088	10,226	10,364



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as malfunctioning gas equipment, leaks at customer equipment, and other factors which are outside the company's control.

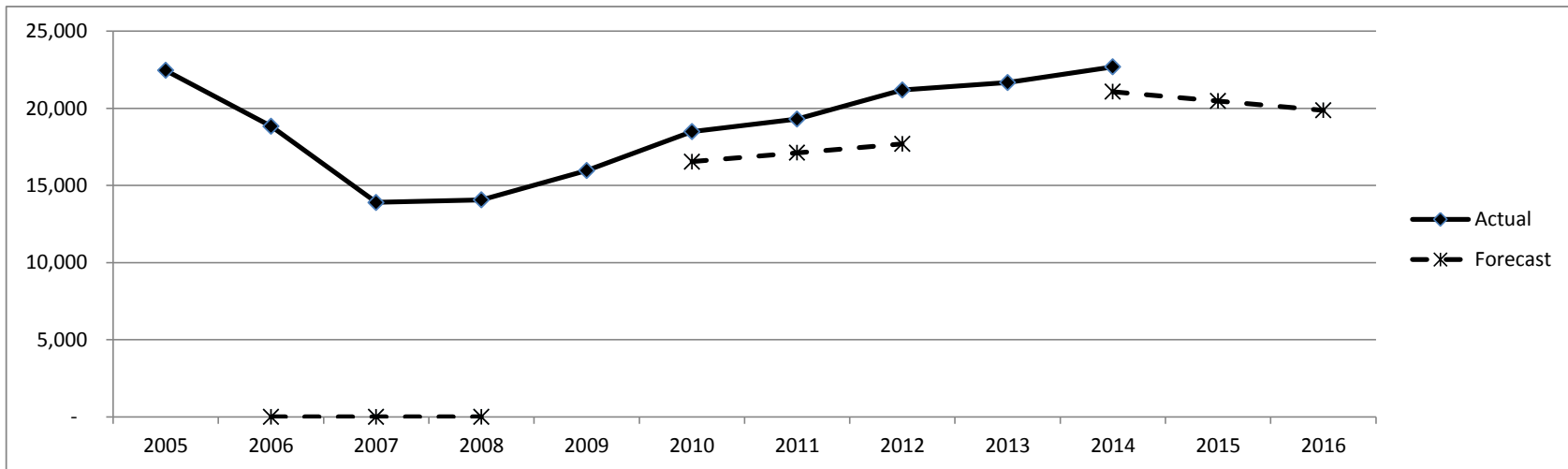
## Commercial/Industrial - ISO

**Source** Customer Work  
**Order Group** Commercial/Industrial  
**Order Type** ISO

**Description:** This order type, an industrial service order, is used when an industrial customer requests service on a gas-fired piece of equipment.

Historical Averages	
5-Yr Avg	19,318
4-Yr Avg	20,158
3-Yr Avg	20,717

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	22,455	18,834	13,895	14,054	15,958	18,479	19,298	21,183	21,671	22,676		
Forecast		-	-	-		16,537	17,117	17,696		21,072	20,473	19,874



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the condition of customer equipment, malfunctioning of customers' gas equipment and other factors which are outside the company's control.

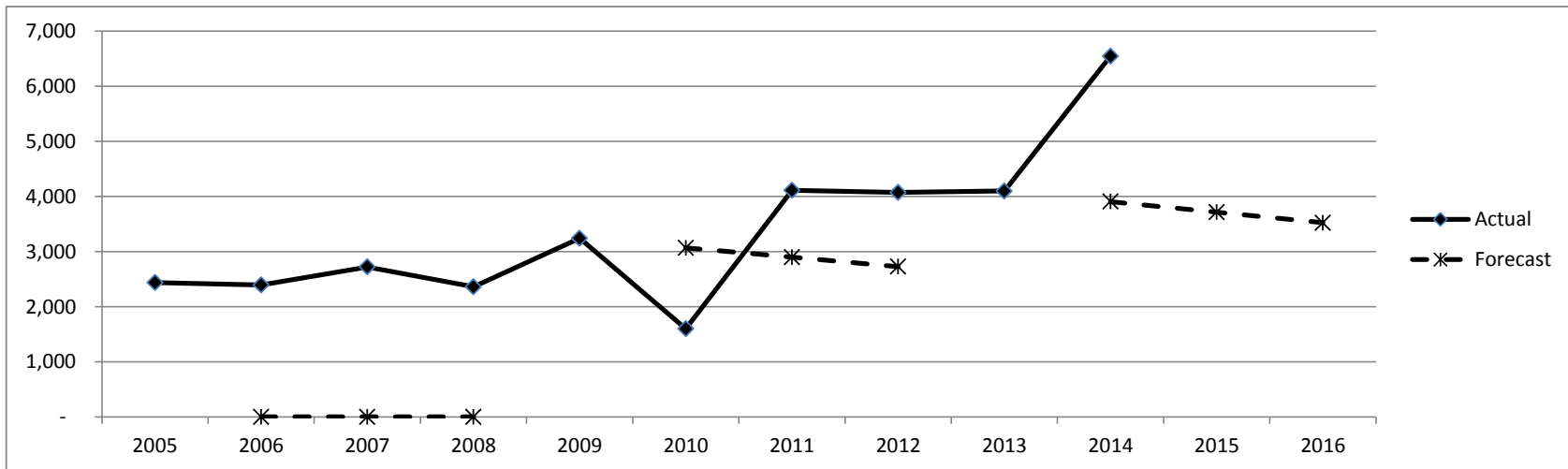
## Commercial/Industrial - Load Survey- I/C

**Source** Customer Work  
**Order Group** Commercial/Industrial  
**Order Type** Load Survey- I/C

**Description:** This order type is used when a commercial/industrial field technician is asked to determine gas end use load at a customer premise, at the customer's request and/or in preparation for a meter change in order to properly size the meter.

Historical Averages	
5-Yr Avg	3,424
4-Yr Avg	3,470
3-Yr Avg	4,093

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	2,438	2,395	2,721	2,361	3,238	1,601	4,110	4,071	4,099	6,547		
Forecast		-	-	-		3,067	2,896	2,725		3,906	3,713	3,521



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the economy, customer turnover, customer equipment choices and other factors which are outside the company's control.



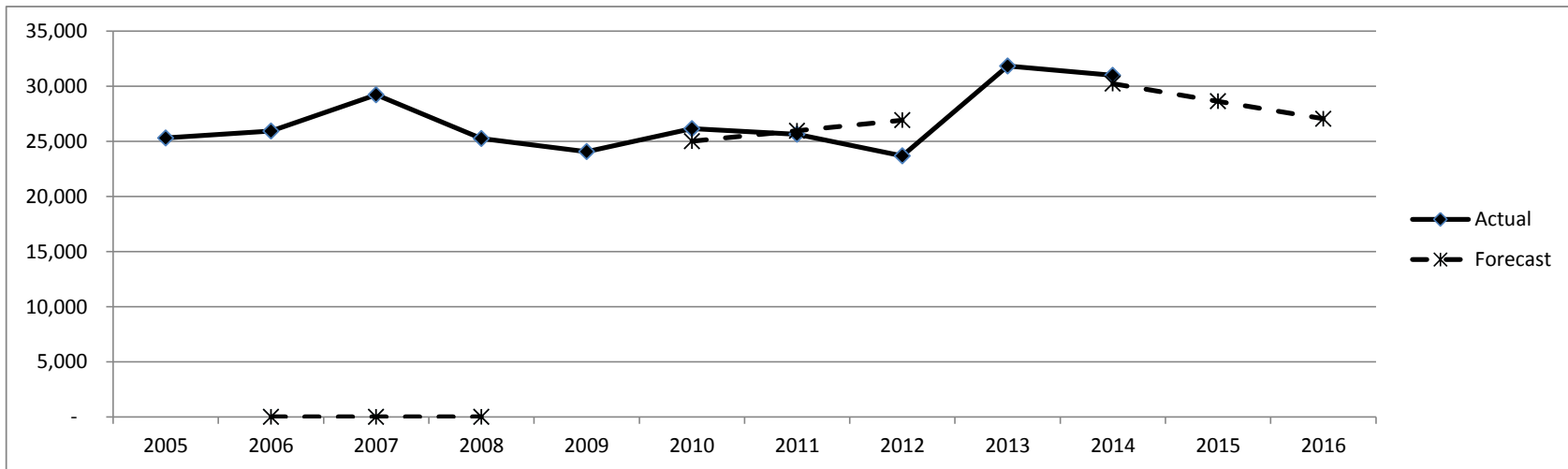
## Commercial/Industrial - CSO

**Source** Customer Work  
**Order Group** Commercial/Industrial  
**Order Type** CSO

**Description:** This order type is used when a commercial customer requests service on a gas-fired piece of equipment.

Historical Averages	
5-Yr Avg	26,273
4-Yr Avg	26,824
3-Yr Avg	27,046

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	25,309	25,924	29,225	25,258	24,070	26,156	25,627	23,685	31,827	30,990		
Forecast		-	-	-		25,017	25,963	26,910		30,231	28,634	27,038



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the condition of customer equipment, malfunctioning of customers' gas equipment and other factors which are outside the company's control.

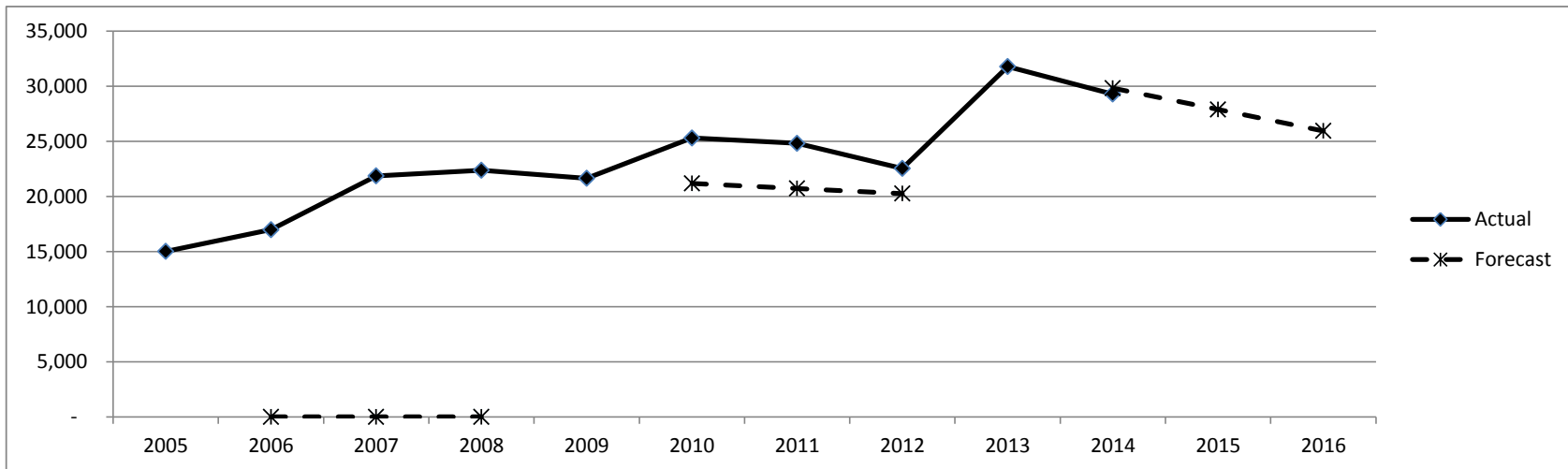
## Commercial/Industrial - Turn On (Entered)

**Source** Customer Work  
**Order Group** Commercial/Industrial  
**Order Type** Turn On (Entered)

**Description:** This order type is used when a commercial/industrial customer requests gas service to be turned on. The commercial/industrial field technician turns on gas service at the meter and services all gas equipment.

Historical Averages	
5-Yr Avg	25,214
4-Yr Avg	26,109
3-Yr Avg	26,376

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	15,011	16,983	21,851	22,368	21,634	25,309	24,813	22,535	31,780	29,292		
Forecast		-	-	-		21,175	20,716	20,256		29,834	27,888	25,942



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Volumes fluctuate from year to year due to external factors, such as the economy, customer turnover and other factors which are outside the company's control.

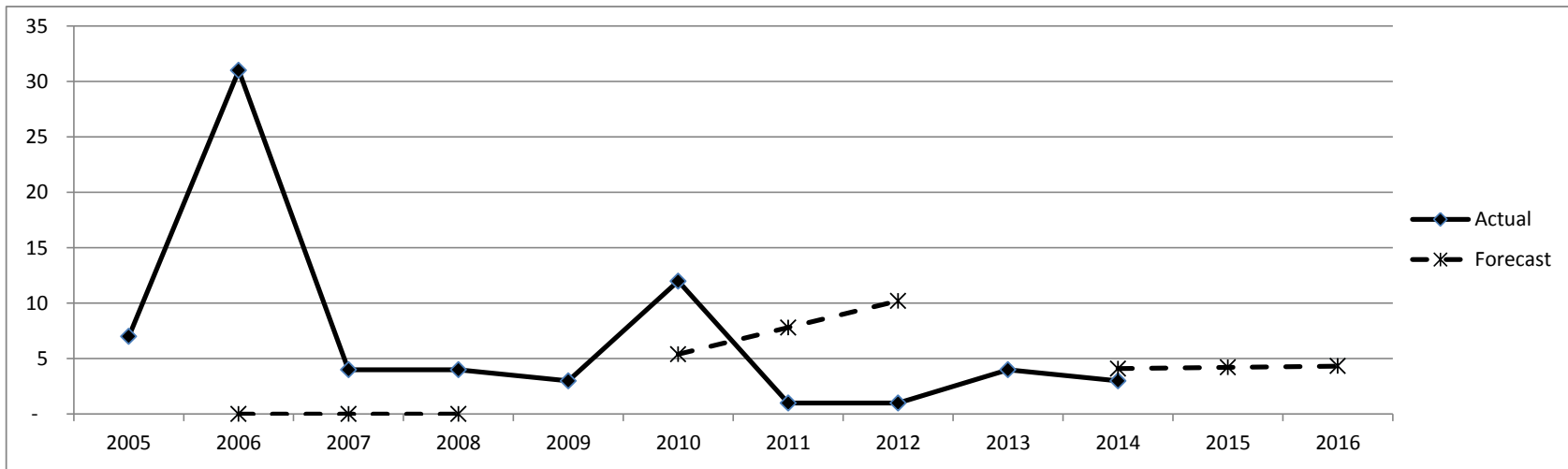
### Cust/Comp Work - Other

**Source** Customer Work  
**Order Group** Cust/Comp Work  
**Order Type** Other

**Description:** This order type is used for miscellaneous customer- or company-generated work at customer premises.

Historical Averages	
5-Yr Avg	4
4-Yr Avg	5
3-Yr Avg	2

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	7	31	4	4	3	12	1	1	4	3		
Forecast		-	-	-		5	8	10		4	4	4



**Forecasting Method:** 5-Year Avg (Orders to Active Meters)

Although volumes are insignificant, they fluctuate from year to year.

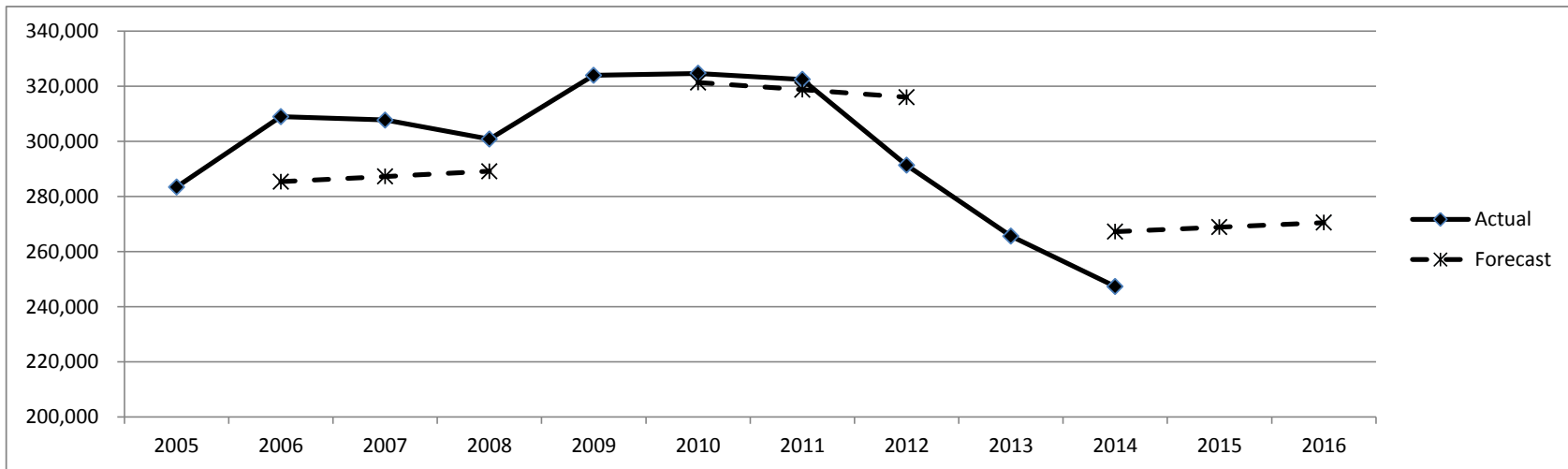
## Incomplete

**Source** Customer/Company  
**Order Group** *Incomplete*  
**Order Type** *Incomplete*

**Description:** This order type is used when a field technician is unable to complete a service order at a customer premise for any number of reasons.

Historical Averages	
5-Yr Avg	305,606
4-Yr Avg	301,012
3-Yr Avg	293,128

Order Counts												
	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual	283,411	308,963	307,716	300,781	323,982	324,664	322,462	291,366	265,557	247,301		
Forecast		285,318	287,227	289,136		321,338	318,693	316,049		267,196	268,835	270,473



**Forecasting Method:** Base Year

Base year reflects a reduction in incomplete orders over the past five years.

## **Appendix B**

### **SoCalGas Data Request (SEU-ORA-DR-06) and ORA Response**



## ORA

Office of Ratepayer Advocates  
California Public Utilities Commission

505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-2544  
Fax: (415) 703-2057

<http://ora.ca.gov>

**ORA Response to Sempra Energy Utilities' Data Request**  
**San Diego Gas & Electric Co. Test Year 2016 General Rate Case, A.14-11-003**  
**Southern California Gas Co. Test Year 2016 General Rate Case, A.14-11-004**

**Origination Date:** May 1, 2015  
**Due Date:** May 15, 2015  
**Response Date:** May 18, 2015

**To:** Chuck Manzuk [cmanzuk@semprautilities.com](mailto:cmanzuk@semprautilities.com) 1-858-654-1782  
Billie Overturf [boverturf@semprautilities.com](mailto:boverturf@semprautilities.com) 1-858-654-1779

**From:** Clayton Tang and Truman Burns, Project Coordinators  
Office of Ratepayer Advocates  
505 Van Ness Avenue, Room 4205  
San Francisco, CA 94102

**Response by:** Tamera Godfrey  
**Phone:** 415-703-1367  
**Email:** [tlg@cpuc.ca.gov](mailto:tlg@cpuc.ca.gov)

**Data Request No:** SEU-ORA-DR-06  
**Exhibit Reference:** ORA-13  
**Subject:** SCG Customer Services Field and Meter Reading  
SDG&E Customer Services Field

***The following is ORA's response to Sempra's data request. If you have any questions, please contact the responder at the phone number and/or email address shown above.***

Q.1: Please provide the actual workpaper page or the Sempra Utility data request response attachment page that serves as the basis for the statements made throughout the prepared direct testimony by Ms. Tamera Godfrey in Exhibit ORA-

---

*Ratepayer Advocates in the Gas, Electric, Telecommunications and Water Industries*

13, as shown below in a. through e., regarding one-time and non-recurring costs that were not removed. Please also explain the basis for ORA's assertion that these are one-time and non-recurring expenses.

- a. Customer Services Field (CSF) Operations on page 49, footnote 135:  
"SCG's historical expenses (2009-2013) include costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business).

ORA discovered that SCG did not remove all these costs, which are incorporate into ORA's TY 2016 estimate and provides embedded funding that SCG can reallocate in the TY for proposed activities (SCG response to ORA-SCG-052-TLG, Q.17)."

- b. CSF Operations on page 54, footnote 147:  
"SCG's adjusted-recorded expenses (2009-2013) for its CSF Operations include overtime costs and costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business) that SCG and reallocate in the TY for proposed activities (SCG response to ORA-SCG-052-TLG, Q.17)."

- c. CSF Operations on page 58, line 13:  
"SCG also has embedded funding from completed and eliminated projects, programs, and training as well as costs incurred for one-time non-recurring activities that SCG can reallocate funding from those activities in the TY for its proposed job shadowing program."

- d. CSF Supervision on page 63, footnote 176:  
"SCG's historical expenses (2009-2013) include costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business). ORA discovered that SCG did not remove all these costs, which are incorporate into ORA's TY 2016 estimate and provides embedded funding that SCG, can reallocate in the TY for proposed activities (SCG response to ORA-SCG-052-TLG, Q.17)."

- e. CSF Support on page 65, footnote 180:  
"SCG's historical expenses (2009-2013) include costs incurred for expenses (2009-2013) include costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business). ORA discovered that SCG did not remove all these costs, which are incorporate into ORA's TY 2016 estimate and provides embedded funding that SCG can reallocate in the TY for proposed activities (SCG response to ORA-SCG-052-TLG, Q.17)."

A.1 a-e:

Regarding “the actual workpaper page or the Sempra Utility data request response attachment page that serves as the basis for the statements” made in ORA’s testimony regarding SCG’s historical expenses (2009-2013) including costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business), see SCG’s response to ORA-SCG-052-TLG, Q.17.

As discussed in ORA’s testimony on pages 49, 54, 58, 63, and 65 SCG’s historical expenses (2009-2013) include costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business). According to SoCalGas’ responses to ORA-SCG-052-TLG, Q. 17, SoCalGas did not remove all these costs. See, in response to ORA-SCG-TLG-52, Q. 17: “For example, brand awareness and loyalty surveys/campaigns/events are not separately identified from other advertising or event expenses.” Since SCG did not separately identify all of these costs, they are still embedded in SCG’s dollars spent in 2009-2013” and are thus incorporated into ORA’s TY 2016 estimate. This provides embedded funding that SCG can reallocate in the TY for proposed activities for its Customer Services Field (CSF) Operations, CSF Supervision, and CSF Support work groups.

ORA’s review and analysis of SCG’s 2009-2013 adjusted-recorded expenses provided in SCG’s response to ORA-SCG-052-TLG, Q. 17 shows significant expense fluctuations from year to year for several line items demonstrating that the associated activities and related costs are not incurred at that expense level on a yearly basis (i.e., one-time and non-recurring expenses). Note that expenses associated with employee meals, luncheons, entertainment, gift cards, employee recognition, holiday events, various corporate events, tickets to sporting events, certain employee/company dues and memberships, and employee laundry are a few examples of the type of expenses SCG incurred between 2009-2013 that are not necessary or required to operate the utility’s business. ORA did not remove these expenses from its estimate, which provides SCG with embedded costs that can be reallocated in the TY for proposed activities

**CSF Operations Expense  
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SCG 2016 Forecast	ORA 2016 Forecast
Labor	\$101,547	\$103,974	\$99,901	\$97,883	\$99,210	\$99,959	\$120,942	\$105,384
Non-Labor	6,727	6,804	6,844	7,053	6,699	8,121	7,003	7,336
Total	\$108,274	\$110,778	\$106,745	\$104,936	\$105,909	\$108,080	\$127,945	\$112,720



Regarding overtime costs included in 2009-2013 adjusted-recorded expenses for CSF Operations, see SCG’s response to ORA-SCG-052-TLG, Q. 17. Regarding “embedded funding from completed and eliminated projects, programs and training” see ORA’s response to Q.5 and Q.6.

**CSF Supervision Expense  
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SCG 2016 Forecast	ORA 2016 Forecast
Labor	\$10,154	\$10,874	\$12,519	\$11,930	\$10,144	\$9,225	\$12,158	\$11,124
Non-Labor	1,247	1,196	1,166	1,115	974	728	1,230	1,140
Total	\$11,401	\$12,070	\$13,685	\$13,045	\$11,118	\$9,953	\$13,388	\$12,264

**CSF Support Expense  
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SCG 2016 Forecast	ORA 2016 Forecast
Labor	\$9,744	\$9,734	\$9,621	\$9,368	\$8,804	\$9,051	\$10,980	\$9,587
Non-Labor	1,191	1,281	1,158	828	954	2,257	1,643	1,446
Total	\$10,935	\$11,015	\$10,779	\$10,196	\$9,758	\$11,308	\$12,623	\$11,033

Q.2: At Exhibit ORA-13, page 11, lines 6-9, ORA indicated it “reviewed and analyzed each individual work order type SDG&E provided in its testimony, in order to determine the historical order volume trend for each individual work order type”. Of the 56 order types ORA reviewed and analyzed, which individual order type forecasts does ORA object to and why?

A.2: Regarding “which individual order type forecasts does ORA object to and why,” note that ORA’s testimony did not state that it objected to SDG&E’s “individual order type forecasts.”

As discussed in ORA’s testimony on page 11, ORA reviewed and analyzed each individual work order type SDG&E provided in its testimony, in order to determine the historical order volume trend for each individual work order type.<sup>1</sup> ORA discovered that, of the fifty-six work order types shown, thirty-two of them showed declining trends in order volumes between 2009-2013. SDG&E’s 2014 adjusted-

<sup>1</sup> Regarding forecasts and historical trends for Work Order Volumes, in response to ORA-SCG-052-TLG, Q. 22-d, SCG states “Relying solely on total order volume trends, rather than order volume trends for each individual work order type, would ignore key factors impacting individual order types.”

recorded expenses of \$13.243 million includes its work order volumes and its 2014 expense level is \$2.435 million lower than its 2013 expense levels of \$15.678 million. SDG&E’s testimony and workpapers did not include any historical cost data associated with each of its fifty-six work order types for analysis.

Q.3: At Exhibit ORA-13, page 47, lines 11-13, ORA indicated it “reviewed and analyzed each individual work order type SCG provided in its testimony, in order to determine the historical order volume trend for each individual work order type”. Of the 50 order types ORA reviewed and analyzed, which individual order type forecasts does ORA object to and why?

A.3: See ORA’s testimony on pages 47-49 and ORA’s response to Q.2 above.

Q.4: At Exhibit ORA-13, ORA calculates SoCalGas’ Customer Services Field (CSF) forecasts for customer growth (page 49, line 18 and page 50, lines 1-2), drive time (page 52, lines 20-22), new CSF services (page 54, lines 8-12), Operator Qualification training (page 57, lines 22-24), and meter set assembly inspections (page 59, lines 4-5) divided SoCalGas’ TY 2016 forecasted cost for the aforementioned elements by three. What is the rationale and basis for dividing the annual cost by three?

A.4: ORA explains the “rationale and basis” for its TY 2016 forecast for SoCalGas’ Customer Services Field (CSF) in detail in ORA’s testimony at pages 45-61. ORA’s CSF forecast is based, in part, on ORA’s recommendation that the Commission normalize the costs over the three-year GRC cycle that SCG used. See, for example, Ex. ORA-13, p. 52, lines 20-22, and Ex. ORA-13, p. 59, line 4.

Q.5: At Exhibit ORA-13, when referring to SDG&E’s request for incremental funding for the CSF cost categories, ORA states “SDG&E should have embedded historical costs from completed or eliminated projects that can be reallocated to address its proposed activities in the Test Year.” For each location listed below where ORA recommends this, please indicate which specific completed or eliminated projects ORA is referring to.

- a. CSF Operations on page 12, lines 9-10
- b. CSF Support on page 14, lines 4-6

A.5 a-b:

In regards to “which specific completed or eliminated projects ORA is referring to” see ORA’s testimony pages 9-12. Note that SDG&E states that its CSF Operations costs “are primarily driven by work order volumes.” SDG&E’s total work order volumes declined by 406,493 between 2009-2013, from 725,946 in 2009 to 319,453 in 2013. ORA was not able to compare SDG&E’s forecast project costs to past project costs or determine which projects have been completed or eliminated. ORA

assumes that SDG&E has at least completed some projects successfully and that those costs can be reallocated to fund new activities. SDG&E's testimony and workpapers did not include any historical cost data associated with each of its fifty-six work order types for analysis.

Q.6: At Exhibit ORA-13, page 58, lines 13-16, when referring to SoCalGas' request for incremental funding for the CSF cost categories, ORA states "SCG also has embedded funding from completed and eliminated projects, programs...that SCG can reallocate funding from those activities in the TY...". Please indicate which specific completed or eliminated projects and programs ORA is referring to.

A.6: See ORA's response to question Q.5.

Q.7: At Exhibit ORA-13, page 54, lines 11-12, "ORA recommends incremental funding of \$1.738 million over 2013 recorded expense levels" to support SoCalGas' new services proposal (Expanded Appliance Safety Checks, Enhanced Customer Education, and Customer Outreach Safety Check) whereas SoCalGas forecasted \$5.213 million. Please provide the calculations and assumptions used to derive the \$1.738 million.

A.7: Regarding the "calculations and assumptions used to derive the \$1.738 million," see ORA's testimony pages 54-57. ORA normalized SCG's forecast of \$5.213 million over three years (\$5.213 million divided by 3 years = \$1.738 million). As discussed in ORA's testimony, SCG's historical expenses already include embedded costs for performing customer appliance safety checks and for various resources to educate customers on different SCG programs. SCG's adjusted-recorded expenses (2009-2013) for its CSF Operations include overtime costs that SCG can reallocate in the TY for proposed activities (see SCG response to ORA-SCG-052-TLG, Q.17).

Q.8: At Exhibit ORA-13, page 63, footnote 173, ORA states "ORA's use of a five year average methodology provides additional funding of \$1.146 million over 2013 recorded expenses and is sufficient for SCG to maintain its 2013 ratio and its proposed ratio for DOT MSA inspections." Please provide calculations and assumptions used to support this claim.

A.8: Regarding the "calculations and assumptions used to support this claim," see ORA's testimony pages 61-64. As discussed in ORA's testimony, SCG's adjusted-recorded expenses have been on a downward trend since 2011. SCG's expenses declined by \$3.732 million or 37.50% between 2011 and 2014, from \$13.685 million in 2011 to \$9.953 million in 2014.

ORA's estimate of \$12.264 million (adding SCG's 2009-2013 adjusted-recorded expenses totaling \$61,319 million/five years = \$12.264 million) for SCG's CSF Supervision work group is \$1.146 million more than SCG's 2013 adjusted-recorded expenses of \$11.118 million. ORA's estimate is \$2.311 million more than SCG's 2014 adjusted-recorded expenses of \$9.953 million. SCG's 2014 adjusted-recorded expenses of \$9.953 million is \$1.847 million less than its 2014 forecast of \$11.800 million. SCG's adjusted-recorded expenses (2009-2013) for its CSF Supervision include overtime costs that SCG can reallocate in the TY for its proposed positions.

- Q.9. At Exhibit ORA-13, for ORA's testimony regarding SoCalGas' CSF Support cost category, please clarify whether ORA is proposing a TY 2016 forecast of \$11.033 million or \$11.008 million. Various text, tables, and footnote calculations are inconsistent in describing what ORA's forecast is for CSF Support, which also could affect the aggregate tables in ORA's testimony. Please refer to ORA's analysis of CSF Support shown on pages 65-69.
- A.9: As discussed in ORA's testimony on pages 65-69, ORA's estimate for SCG's CSF Support work group is \$11.033 million. ORA calculated its estimate utilizing SCG's 2013 adjusted-recorded expenses as a basis of \$9.758 million, and added incremental funding of \$1.275 million: \$0.923 million and \$0.352 million (note that ORA opposed \$40,000 associated with one-time costs for audio/video equipment of SCG's \$65,000 non-labor forecast). See SCG's Table SAF-22 on page SAF-33.

**END OF RESPONSE**

---

Appendix C – ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**Exhibit Reference:** SCG-10

**Subject:** Customer Services Field and Meter Reading

**Please provide the following:**

1. SCG forecasts \$203.209 million (\$200.803 million for Non-Shared, and \$2.406 million for Shared Services) for Test Year 2016 for its Customer Service Field and Meter Reading Operations and Maintenance (O&M) expenses. This is an increase of \$30.450 million or 17.63% over 2013 recorded adjusted expenses of \$172.759 million. The five year average (2009-2013) is \$176.833 million and the three year average (2011-2013) is \$175.569 million.
  - a. SCG states on page SAF-iii that it is proposing “incremental funding to ensure ongoing and enhanced compliance with Department of Transportation (“DOT”)-required meter set assembly (“MSA”) inspections.” Provide documentation that explains if SCG has failed to comply with DOT-required MSA inspections during 2009-2013.
  - b. Provide documentation that explains in detail if SCG’s 2009-2013 recorded adjusted expenses include costs incurred for ongoing compliance with DOT-required MSA inspections.
  - c. If historical expenses do include costs for ongoing compliance with DOT-required MSA inspections, provide a detailed breakdown of the costs incurred for this activity for 2009-2013.
  - d. SCG states on page SAF-iii it is proposing “incremental funding for updating/modernizing field technician training, refresher training for technicians who remain in their positions for extended periods of time, formalized instruction for ongoing policy reviews to deepen employee understanding, job shadowing so retiring field technicians can transfer their knowledge to newer technicians before leaving the company, in-field training instructions for commercial and industrial field technicians, and more frequent Operator Qualification (“OpQual”) training.” Provide documentation that explains in detail if SCG’s 2009-2013 recorded adjusted expenses include costs incurred for updating/modernizing field technician training, refresher training for technicians who remain in their positions for extended periods of time, formalized instruction for ongoing policy reviews, job shadowing, in-field training instructions for commercial and industrial field technicians, and Operator Qualification training.
  - e. If historical expenses do include costs for updating/modernizing field technician training, refresher training for technicians who remain in their positions for extended periods of time, formalized instruction for ongoing policy reviews, job shadowing, in-field training instructions for commercial and industrial field technicians, and Operator Qualification training, provide a detailed breakdown of the costs incurred for each activity for 2009-2013.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**Question 1 (Continued)**

- v. SCG states on page SAF-4 that “it should be noted that implementation of AMI involves both costs (i.e., increases to revenue requirement) and benefits (i.e., decreases to revenue requirement).” Provide documentation that explains if SCG spends less than it requested and was authorized for proposed AMI activities and 2012 GRC proposed activities, is this what SCG considers to be a “benefit.” If so, please explain why. If not, please explain why not.
- h. For SCG’s Customer Service Field and Meter Reading, provide the recorded adjusted 2014 labor and non-labor expenses as of December 31, 2014 in the same manner as shown in workpapers on pages 185-186.
- i. For SCG’s Customer Service Field and Meter Reading, provide the recorded 2014 capital expenditures for all projects listed in Table SAF-32 on page SAF-47.

**SoCalGas Response:**

- 1.a. SoCalGas has not failed to comply with DOT-required MSA inspections. The required inspections have been performed by Meter Reading in the past, in conjunction with obtaining meter reads each month, and are in the process of being transferred to a new organization within CSF given that SoCalGas Advanced Metering Infrastructure (AMI) is being deployed. The Meter Reading department will be eliminated post AMI deployment.
- 1.b. SoCalGas Meter Readers currently perform the DOT-required MSA inspections in conjunction with reading the meters for billing purposes. Costs associated with MSA inspection activity are embedded in the 2009-2013 recorded adjusted costs for the four Meter Reading work groups - Meter Reading Operations, Meter Reading Clerical, Meter Reading Supervision/Training and Meter Reading Support. SoCalGas is not able to segregate the MSA inspection portion of meter reading costs, as expenses are not tracked at that level of granularity. The Commission’s Advance Metering Infrastructure (AMI) decision (D.10-04-027) assumes all Meter Reading costs are eliminated after full deployment of AMI.
- 1.c. SoCalGas is not able to segregate the MSA inspection portion of Meter Reading costs, as expenses are not tracked at that level of granularity.
- 1.d. SoCalGas’ 2009-2013 recorded adjusted expenses do not include any industrial field instructors to support industrial field technicians, refresher training for CSF technicians who remain in their positions for extended periods of time, formalized instruction for ongoing policy reviews to deepen employee understanding, or job shadowing so retiring field technicians can transfer their knowledge to newer employees before leaving the company.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

5. Provide documentation that demonstrates all recorded costs incurred for overtime/double-time for 2009-2013 for SCG's Customer Service Field and Meter Reading . Provide the recorded overtime/double-time costs in a spreadsheet similar to the one shown in workpapers on page 185-186.

**SoCalGas Response:**

Please see the file attached in response to Question 17 (“ORA-SCG-052-TLG-Q17 Attachment.xlsx”) for the detailed breakdown of overtime and double-time labor by workpaper group and shared service cost center within each of the applicable labor cost categories.



**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 19, 2015**

6. Provide documentation that explains and demonstrates the calculation of SCG employee retirement savings for each year (2009-2013) and the incorporation of the cost savings into its TY 2016 FTE forecast.

**SoCalGas Response:**

SoCalGas' forecast of required funding for its Customer Services Field – Operations area is, at its core, based on activity levels, not FTEs or headcount. SoCalGas prepared a work order volume forecast, then factored in multiple variables (i.e., on premise time per work order, drive time per order (to travel to and from each work order), Vacation & Sickness rates, non-job time rates (e.g., for start/end of day non-order work, breaks, etc.), and training time rates) to calculate the necessary hours (FTEs) to perform the volume of forecasted work. To determine required funding, SoCalGas multiplied the total hours by a blended wage rate. For the TY 2016 forecast, SoCalGas used 2013 base year data to calculate a blended wage rate of \$37.77 per hour. This rate is a blend of all CSF job classifications and includes straight-time and overtime. Retirement numbers were not factored in as they are accounted for in the blended wage rate that SoCalGas used to forecast costs.

With the exception of the CSF-Operations cost category, SoCalGas has not projected retirements nor included projected retirements in its cost forecasts, as potential retirements are not expected to have any impact on CSF and Meter Reading cost forecasts.

**ORA DATA REQUEST  
 ORA-SCG-DR-052-TLG  
 SOCALGAS 2016 GRC – A.14-11-004  
 SOCALGAS AMENDED RESPONSE  
 DATE RECEIVED: FEBRUARY 3, 2015  
 DATE RESPONDED: FEBRUARY 26, 2015**

8. Provide documentation demonstrating the actual final salaries for each retired residential, commercial and industrial field technicians for 2009-2014.

**SoCalGas Amended Response:**

Residential, commercial and industrial field technicians are hourly union employees. Customer Services Field does not track the hourly wages of retiring CSF technicians. The hourly pay rates below reflect those set forth in SoCalGas' historical and current collective bargaining agreements for each CSF job classification. Employees who retire from the company are normally at the top end of their pay grade due to their high seniority.

In addition, SoCalGas has queried the Human Resources information system for hourly wage rates of retired employees and has included the final hourly wage rate for each residential, commercial and industrial field technician who retired in years 2009 through 2014. See the attached file "ORA-SCG-DR-052-TLG-Q8 Attachment.xlsx".

**Field Service Assistant**

<b>6 Months per step, 2 year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. <b>10/1/09</b>	\$25.20	\$26.45	\$26.96	\$27.48	\$28.03
Hourly Base Rate Eff. <b>10/1/10</b>	\$26.09	\$27.38	\$27.91	\$28.45	\$29.02
Hourly Base Rate Eff. <b>1/1/12</b>	\$26.80	\$28.13	\$28.67	\$29.23	\$29.81
Hourly Base Rate Eff. <b>1/1/13</b>	\$27.54	\$28.90	\$29.46	\$30.03	\$30.64
Hourly Base Rate Eff. <b>1/1/14</b>	\$28.23	\$29.63	\$30.20	\$30.78	\$31.40

**Field Technician/Field Collector**

<b>6 Months per step, 2 year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. <b>10/1/09</b>	\$26.89	\$28.23	\$28.80	\$29.35	\$29.92
Hourly Base Rate Eff. <b>10/1/10</b>	\$27.84	\$29.22	\$29.81	\$30.38	\$30.97
Hourly Base Rate Eff. <b>1/1/12</b>	\$28.60	\$30.02	\$30.63	\$31.21	\$31.82
Hourly Base Rate Eff. <b>1/1/13</b>	\$29.39	\$30.85	\$31.47	\$32.07	\$32.69
Hourly Base Rate Eff. <b>1/1/14</b>	\$30.12	\$31.62	\$32.26	\$32.87	\$33.51

**ORA DATA REQUEST  
 ORA-SCG-DR-052-TLG  
 SOCALGAS 2016 GRC – A.14-11-004  
 SOCALGAS AMENDED RESPONSE  
 DATE RECEIVED: FEBRUARY 3, 2015  
 DATE RESPONDED: FEBRUARY 26, 2015**

Response to Question 8 (Continued)

**Residential Field Technician/Lead Field Collector**

<b>6 Months per step, 2 year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. <b>10/1/09</b>	\$28.89	\$30.34	\$30.95	\$31.53	\$32.17
Hourly Base Rate Eff. <b>10/1/10</b>	\$29.91	\$31.41	\$32.04	\$32.64	\$33.30
Hourly Base Rate Eff. <b>1/1/12</b>	\$30.73	\$32.27	\$32.92	\$33.53	\$34.21
Hourly Base Rate Eff. <b>1/1/13</b>	\$31.57	\$33.16	\$33.82	\$34.46	\$35.15
Hourly Base Rate Eff. <b>1/1/14</b>	\$32.36	\$33.99	\$34.67	\$35.32	\$36.03

**Commercial Field Technician**

<b>6 Months per step, 2 year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. <b>10/1/09</b>	\$31.22	\$32.77	\$33.41	\$34.07	\$34.74
Hourly Base Rate Eff. <b>10/1/10</b>	\$32.32	\$33.92	\$34.58	\$35.27	\$35.96
Hourly Base Rate Eff. <b>1/1/12</b>	\$33.20	\$34.85	\$35.53	\$36.24	\$36.94
Hourly Base Rate Eff. <b>1/1/13</b>	\$34.12	\$35.81	\$36.50	\$37.23	\$37.96
Hourly Base Rate Eff. <b>1/1/14</b>	\$34.97	\$36.70	\$37.42	\$38.16	\$38.91

**Industrial Field Technician**

<b>6 Months per step, 2 year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. <b>10/1/09</b>	\$35.92	\$37.71	\$38.43	\$39.20	\$39.96
Hourly Base Rate Eff. <b>10/1/10</b>	\$37.18	\$39.03	\$39.78	\$40.58	\$41.36
Hourly Base Rate Eff. <b>1/1/12</b>	\$38.20	\$40.10	\$40.87	\$41.69	\$42.49
Hourly Base Rate Eff. <b>1/1/13</b>	\$39.25	\$41.20	\$41.99	\$42.84	\$43.66
Hourly Base Rate Eff. <b>1/1/14</b>	\$40.23	\$42.23	\$43.04	\$43.91	\$44.75

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS **PARTIAL** RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 19, 2015**

10. Provide documentation that explains in detail and demonstrates why SCG's current staffing levels are insufficient to perform the work activities proposed for Test Year 2016.

**SoCalGas Response:**

Detailed documentation and explanations are provided in the testimony and workpapers of SoCalGas witness Sara Franke (Exs. SCG-10 and SCG-10-WP), and SoCalGas does not have additional documentation beyond that which has already been provided. Please note that SoCalGas' forecast of required funding for its CSF-Operations cost category is, at its core, based on activity levels, not FTEs or headcount. SoCalGas prepared a work order volume forecast (by individual work order type), then factored in multiple variables (i.e., on premise time per work order, drive time per order [to travel to and from each work order]), Vacation & Sickness rates, non-job time rates (e.g., for start/end of day non-order work, breaks, etc.), and training time rates) to calculate the necessary hours to perform the volume of forecasted work orders field technicians will need to complete. FTEs are calculated by dividing the total hours by 2,080 (i.e., the total number of work hours in a year per employee). The total hours required to complete the forecasted work exceed the hours available at current staffing levels. For your convenience, attached is another copy of the forecast model "ORA-SCG-DR-052-TLG-Q10 Attachment 1.xlsx" SoCalGas used to determine funding requirements for the CSF Operations cost category.

Similarly, for the other cost categories presented in SoCalGas Ex. SCG-10, any incremental request for funding represents a new activity or increase in activity level that cannot be absorbed by current staffing levels as there is no such excess capacity to do so.

Incremental work volumes/activities that cannot be absorbed within existing staffing levels are summarized below.

**Incremental Requests for CSF-Operations**

In addition to projected work order volumes increasing in TY 2016 (requiring incremental workforce to complete the incremental work), please also note the following:

- Average drive time per order (the time a technician spends traveling to and from work orders) has increased by 10% from 2009 to 2013. This increasing trend is expected to continue in the future as the economy improves and more people are on the road, increasing traffic congestion. This means that field technicians spend more of their available work time driving instead of completing work orders which, in turn, means that more technicians are required to perform the work. Please see Ex. SCG-10, page SAF-12 and Table SAF-8 or the attached file "ORA-SCG-DR-052-TLG-Q10 Attachment 2.xlsx" for additional information regarding average drive time per work order.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS **PARTIAL** RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 19, 2015**

**Response to Question 10 (Continued)**

**Incremental Requests for Meter Reading-Support**

- Unfilled Positions from 2008 GRC - Similar to the explanation provided above for the additional meter reading supervisors and field instructor authorized in SoCalGas' 2008 GRC, the 2008 GRC authorized \$0.428 million for additional meter reading route analysts. This cost increase was included (assumed) in SoCalGas' authorized AMI benefits. The historical 5-year average costs for 2009-2013 do not include the \$0.428 million that was requested and authorized in SoCalGas' 2008 GRC. These positions would have been added if not for AMI implementation. But because of AMI implementation, SoCalGas did not add these positions in anticipation of AMI implementation and associated job reductions that would result. Because these costs are included in the AMI benefits, they need to be added here to avoid double counting of AMI benefits.

**Incremental requests for Customer Services Field-Field Staff**

- Customer Services Staff Director – As a result of a reorganization in early 2014, a new CSF Staff director position was created to lead and oversee SoCalGas' CSF Training and Development, CSF Quality Assurance and Inspection, CSF Technology, and CSF Staff functions. The broader scope of responsibilities necessitated that a director position be created. In addition, combining these functions under a single director enables closer coordination across these functions, all of which support and enable CSF operations.
- Diversion Investigation Program - Given the inherent safety risks associated with gas diversion and SoCalGas' goal of continuously improving safety, SoCalGas is requesting \$0.483 million to add four diversion investigators and one diversion investigation supervisor. SoCalGas' current program will be expanded in 2016, contingent on receiving the requested GRC funding. The number of positions requested is based on the number of investigators SoCalGas estimates it would need in order to follow-up on a much greater percentage of the "diversion leads" generated in the field each year, as well as conduct periodic, proactive site visits to look for possible instances of gas diversion, on a workload-permitting basis.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

17. For SCG's Customer Service Field and Meter Reading for 2009-2013 provide, in a spreadsheet similar to the one shown in workpapers on pages 185-186, a detailed and itemized listing of all labor and non-labor expenses (note: do not lump expenses together in the response, separate and identify the expenses by the categories as requested below) incurred for 1) employee meals, 2) employee luncheons, 3) vendor payments for offsite meetings and events (provide copies of contracts for costs and services provided), 4) all entertainment expenses, 5) employee recognition activities, 6) sporting events, 7) bonuses/awards, 8) employee/company memberships and dues, 9) all contributions, 10) charitable events, 11) brand awareness and loyalty surveys/campaigns/events, and 12) other employee reimbursable expenses.

**SoCalGas Response:**

The expenses shown in the attachment "ORA-SCG-DR-052-TLG-Q17 Attachment.xlsx" reflect the dollars spent in 2009-2013 as charged by the operating areas. The data shows that there is variation in categories used, which is dependent upon the people responsible for assigning costs. All recorded costs are included in the attachment. Not all categories requested by ORA are specifically or separately identifiable. For example, brand awareness and loyalty surveys/campaigns/events are not separately identified from other advertising or event expenses.

## ORA-SCG-DR-052-TLG QUESTION 17 ATTACHMENT

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper for ORA-SCG-DR-052-TLG, Question 17  
 Exhibit Reference: SCG-10 Customer Services Field and Meter Reading

						Fiscal year				
TOTAL O&M (NSS+USS)						2009	2010	2011	2012	2013
NON-SHARED Total						\$177,265,805	\$180,195,308	\$178,222,835	\$175,727,636	\$172,758,868
Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$0	\$0	\$0	\$98	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$0	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$60	\$0	\$0	\$3,048	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$0	\$0	\$0	\$783	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$71,557,474	\$72,001,679	\$69,577,693	\$71,285,429	\$70,394,005
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$11,487,244	\$13,452,113	\$13,495,741	\$10,263,997	\$12,377,309
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$2,246,082	\$2,784,383	\$2,519,827	\$2,103,286	\$2,235,755
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$223	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$1,109	\$0	\$36,354	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$0	\$233
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$17,312	\$17,056
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$233	\$0	\$1,661	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Overtime Labor T&1/2	6110183	SAL-PT TIME UN T&H	\$0	\$0	\$0	\$1,042	\$371
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Other Labor	6110256	SAL-MISC	\$490,020	(\$376)	\$4,442	\$680,082	\$15,023
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Other Labor	6110270	SAL-SEVERENCE	\$9,592	\$11,061	\$18,134	\$13,641	\$21,897
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$213,375	\$253,982	\$17,274	\$5,976	\$9,171
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$15,541,178	\$15,470,297	\$14,229,974	\$13,508,389	\$14,138,770
<b>2FC001.000</b>	<b>CUSTOMER SERVICES FIELD - OPERATIONS</b>	<b>Labor</b>	<b>Labor</b>	<b>TOTAL LABOR</b>	<b>TOTAL LABOR</b>	<b>\$101,546,589</b>	<b>\$103,973,139</b>	<b>\$99,901,100</b>	<b>\$97,883,083</b>	<b>\$99,209,590</b>
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120000	EMPLOYEE BENEFITS	\$0	\$0	\$396	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120011	EMP BEN-LT DISABILIT	\$180	(\$955)	(\$5,260)	(\$1,734)	\$151
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$99,917	\$98,384	\$90,418	\$104,012	\$100,343
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120019	EMP BEN-TRANSP ALLOW	\$0	\$0	\$0	\$0	\$129
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120050	EMP BEN-HLTH INS RET	\$278	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120053	EMP BEN-MISC	\$111	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120075	EMP BEN-RANDOM TEST	\$0	\$0	\$57	\$25	\$120
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120078	EMP BEN-RET TOWRKEXM	\$0	\$0	\$213	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$466	\$2,770	\$232
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$2,083	\$0	\$0	\$2,633	\$216
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$112	\$134	\$531	\$35	\$373
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$67,727	\$63,027	\$73,111	\$86,100	\$106,571
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$61,578	\$51,910	\$64,975	\$67,666	\$91,681
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$1,210	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$0	\$21	\$699	\$37	\$49
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$3,907	\$2,071	\$1,314	\$2,902	\$238
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$18,787	\$19,544	\$16,163	\$25,907	\$17,607
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$0	\$0	\$655	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$180,756	\$126,512	\$233,845	\$209,156	\$349,992
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Reimbursable	6130055	EMP TRVL-CO PD TRAVE	\$0	\$1,229	\$768	\$1,882	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6210000	PURCHASED MATERIALS	\$0	\$9	\$0	\$28	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6210210	MATL-INV ADJUST ACCT	\$18	\$0	(\$23)	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$0	\$0	\$0	\$0	\$117
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE SUPPLNRY	\$0	\$13,288	\$31,687	\$45,057	\$44,468
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$0	\$4,774
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$260	\$173	\$253	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$112,437	\$140,519	\$145,748	\$205,811	\$191,499
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$278,311	\$227,231	\$257,970	\$298,264	\$329,755
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$1,209	\$3,453	\$1,041	\$1,220	\$798
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$749	\$0	\$264	\$0	\$0



Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$1,868	\$0	\$2,438	\$639	\$634
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$446	\$409	\$395	\$250	\$41
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$2	\$0	\$243	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213045	MATL-DIESEL FUEL	\$0	\$0	\$0	\$252	\$5
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213055	MATL-OIL&LUBRICANTS	\$0	\$198	\$238	\$350	\$542
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213060	MATL-VEHICLE PARTS	\$561	\$212	\$3,641	\$1,400	\$269
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213070	MATL-PARTS	\$475,666	\$488,965	\$420,775	\$384,805	\$352,763
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$302	\$594	\$34	\$7	\$1,259
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$914,130	\$501,586	\$92,930	\$50,055	\$39,966
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$430	\$298	\$240	\$118	\$124
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$539	\$11	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213100	MATL-ACTUATORS	\$0	\$0	\$0	\$0	\$383
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213105	MATL-ANODES	\$0	\$867	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213110	MATL-APPLIANCE PARTS	\$10,738	\$19,147	\$18,116	\$36,818	\$32,501
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213115	MATL-ASPHALT	\$0	\$8,289	\$8,386	\$7,803	\$3,974
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213125	MATL-VEHICL SUPPLIES	\$1,708	\$185	\$0	\$49	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$5,410	\$4,992	\$4,287	\$5,964	\$6,660
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$359	\$0	\$464	\$205	\$282
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213150	MATL-CAPACITRS&RACKS	\$0	\$0	\$0	\$502	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213155	MATL-CATHODIC EQUIPM	\$0	\$80	\$306	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$7,689	\$3,061	\$4,971	\$7,196	\$11,711
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213200	MATL-CONSTRUCTION EQ	\$0	\$0	\$328	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213225	MATL-ELECTRIC EQUIP	\$0	\$57	\$1,978	\$287	\$68
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6213255	MATL-FAX MACHINES	\$120	\$0	\$0	\$0	\$941
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213260	MATL-FITTINGS	\$0	\$0	\$0	\$549	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213285	MATL-GAS METERS	\$0	\$2,830	\$283	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213295	MATL-GAS REGULATORS	\$1,526	\$1,587	\$0	\$18	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213300	MATL-GASES-INDSTRAL	\$32,576	\$33,459	\$34,422	\$40,886	\$54,187
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213305	MATL-GASKETS	\$0	\$0	\$0	\$55	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213310	MATL-GAUGES	\$0	\$12,443	\$0	\$0	\$432
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213325	MATL-HARDWARE	\$0	\$10	\$0	\$20	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213345	MATL-LG PWR XFORMERS	\$150	\$573	\$80	\$264	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213350	MATL-LG GENERATR RPR	\$0	\$0	\$0	\$0	\$2,290
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213355	MATL-LEAK CLAMPS	\$0	\$0	\$30	\$0	\$42
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$2,066	\$924	\$2,122	\$2,230	\$657
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213365	MATL-MEASURMT INSTRU	\$0	\$57	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213370	MATL-MECHNICAL EQUIP	\$13	\$0	\$0	\$587	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213380	MATL-METALS	\$0	\$0	\$0	\$442	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213385	MATL-ELEC MISC	\$194	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213405	MATL-PACKAGING MATL	\$174	\$4	\$31	\$4	\$8
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213420	MATL-PAVING MATERIAL	\$0	\$0	\$0	\$279	\$717
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213435	MATL-PIPE WRAPPING	\$29	\$33	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213445	MATL-PLANNING EQUIPM	\$157	\$57	\$917	\$1,133	\$80
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$190,935	\$236,046	\$157,180	\$309,459	\$106,627
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213485	MATL-PUMPS	\$0	\$0	\$32	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$1,057	\$416	\$232	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213500	MATL-ROCK SAND DIRT	\$0	\$944	\$118	\$1,402	\$4,043
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$0	\$302	\$109	\$1,703	\$1,875
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$12,501	\$5,877	\$6,624	\$6,589	\$4,160
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213525	MATL-METAL PIPE&FITG	\$3,356	\$6,053	\$3,423	\$1,384	\$2,065

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213540	MATL-WHSE STORAGE EQ	\$0	\$0	\$430	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213541	MATL-WELDING EQUIPMT	\$0	\$130	\$76	\$5	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$98	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213580	MATL-LANDSCAPING SUP	\$0	\$85	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6213590	MATL-JANITORIAL SUPP	\$0	\$0	\$47	\$0	\$38
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215160	MI-Fleet	\$0	\$9	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215560	MI-PRECHARGED TOOLS	\$26,745	\$370,883	\$666,582	\$690,143	\$693,349
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215561	MI-PRECHRGDMISCIPEM	\$67	\$26	\$377	\$480	\$541
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215562	MI-PRECHRGDMISCIPEF	\$10,861	\$9,820	\$10,089	\$14,218	\$16,082
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215563	MI-PRECHRGDSTORESMAT	\$290	\$154	\$58	\$30	\$21
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215565	MI-PRECHRGDOFFSUPPL	\$1,041	\$1,823	\$538	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215566	MI-OTHER PRECHRGDMAT	\$544,628	\$720,525	\$796,133	\$881,567	\$1,038,532
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215567	MI-PIPE	\$787	\$34	\$120	\$86	\$120
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$1,587,789	\$1,633,320	\$1,796,935	\$1,822,605	\$1,763,085
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$98	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$19	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220007	SRV-CONTR-TIME&EQUIP	\$0	\$0	\$236	\$301	\$487
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220008	SRV-CONTRACTORS	\$244	\$3,963	\$920	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$0	\$1,012	\$713	\$31	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKMTG	\$0	\$81	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$35,982	\$25,020	\$28,436	\$32,505	\$16,839
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Luncheons	6220063	SRV-FOOD-LEASES(CBS)	\$289	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	(\$979)	\$204	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220091	SRV-PEST CONTROL	\$3,935	\$1,388	\$6,210	\$8,056	\$8,752
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220190	SRV-SECURITY	\$11,328	\$1,864	\$5,823	\$698	\$2,834
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$1,170	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$191	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$1,113,806	\$1,069,520	\$1,062,018	\$963,141	\$491,683
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$675	\$333	\$197	\$14,326
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$8,393	\$11,921	\$9,877	\$1,978	\$2,462
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$152	\$8,669	\$4,815	(\$50)	\$89
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$1,184	\$3,225	\$3,426	\$4,570
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$100	\$271	\$2,100	\$513	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$0	\$17	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$0	\$75	\$80	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$11	\$221	\$173	\$435	\$1,730
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$0	\$10	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6220530	SRV-CONSTRUCTN OTHER	\$34,633	\$7,941	\$14,359	\$20,581	\$62,528
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220560	SRV-CONSTRUCTN PAVNG	\$0	\$1,676	\$1,227	\$0	\$493
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220570	SRV-DESIGN	\$0	\$135	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$0	\$0	\$0	\$0	\$60
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$23,679	\$13,184	\$10,301	\$14,570	\$14,427
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$453	\$454	\$0	\$229	\$256
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$11,813	\$13,083	\$5,705	\$2,808	\$347
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Related	6220790	SRV-MEDICAL	\$0	\$0	\$0	\$0	\$90
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220810	SRV-CUSTOMER SERVCS	\$0	\$0	\$1,159	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$12	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$140	\$1,681	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220843	SRV-VEHICLE WASHING	\$0	\$90	\$318	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220846	SRV-VEHICLE TOWING	\$0	\$77	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220850	SRV-VEH&EQUIP W/OPER	\$392	\$2,655	\$43	\$116	\$705
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$524,967	\$571,416	\$596,306	\$519,129	\$532,238
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$1,672	\$6,783	\$276	\$11	\$3
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Contract Services	6220880	SRV-CONSTR-GAS PIPE	\$0	\$2,541	\$1,415	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220900	SRV-TRASH COLLECTION	\$3,368	\$0	\$104	\$5,168	\$1,624
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220910	SRV-HAZ WASTE DISPOS	\$0	\$1,592	\$1,004	\$74	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220920	SRV-SAFETY RELATED	\$1,639	\$6,347	\$3,301	\$5,176	\$568
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6220950	SRV-AUCTIONING	\$0	\$0	\$837	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$297	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6220980	SRV-JANITORIAL	\$0	\$0	\$1,049	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6221050	SRV-LABORATORY	\$16	\$299	\$878	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6230210	SRV-LEGAL-SETTLMNTS	\$7,755	\$0	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$54,285	\$21,750	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Office/Furn Supplies	6230440	SRV-EXPRESS POSTAGE	\$0	\$0	\$0	\$17	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$800	\$907	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6230610	SRV-WATER	\$101	\$0	\$91	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Purchased Services	6230630	SRV-UTILITIES	\$0	\$0	\$0	\$0	\$41
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$0	\$0	\$153	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$0	\$0	\$0	\$238
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$0	\$0	\$0	\$271	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$135	\$0	\$0	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$7	\$0	\$0	\$19	\$0
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$143,427	\$127,903	\$113,302	\$96,409	\$88,789
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$79,156	\$77,917	\$70,598	\$72,357	\$73,743
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	(\$48)	\$0	(\$49)	(\$46)	(\$85)
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Misc NL Costs	6350710	CREDIT FOR CASH COLL	(\$7,512)	(\$1,728)	(\$56,214)	(\$23,202)	(\$2,614)
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Misc NL Costs	6405000	A&G-MISC GENERAL EXP	\$1,224	\$2,203	\$434	\$728	\$239
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Misc NL Costs	6405012	A&G-GOVT PMTS-PERMIT	\$2,481	\$6,323	\$1,578	\$2,141	\$135
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$6,726,596	\$6,804,611	\$6,844,350	\$7,053,547	\$6,697,783
2FC001.000	CUSTOMER SERVICES FIELD - OPERATIONS	TOTAL		TOTAL ALL		\$108,273,185	\$110,777,750	\$106,745,450	\$104,936,630	\$105,907,373
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$8,290,563	\$9,000,029	\$10,501,719	\$10,080,315	\$8,445,136
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$204,017	\$204,539	\$151,801	\$133,139	\$84,274
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$0	\$0	\$52,053	\$36,988	\$24,910
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$9,367	\$27,414	\$14,644	\$7,698	\$14,745
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$1,494	\$3,618	\$1,093	\$3,146	\$431
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$41	\$83	\$3,027	\$35	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$16,079	\$24,717
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$76,973	\$21,232	\$4,397	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$5	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$104	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Other Labor	6110256	SAL-MISC	\$0	(\$641)	\$6,581	\$6,254	\$7,395
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Other Labor	6110270	SAL-SEVERENCE	\$16,843	\$0	\$0	\$0	\$96,293
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$0	\$0	\$0	\$0	\$0
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$1,553,893	\$1,617,997	\$1,783,136	\$1,646,430	\$1,445,591
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Labor	Labor	Labor	TOTAL LABOR	\$10,153,192	\$10,874,271	\$12,518,450	\$11,930,193	\$10,143,492
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$1,224	\$1,929	\$1,503	\$2,335	\$1,955
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Related	6120018	EMP BEN-PRE-EMP PHYS	\$0	\$0	\$0	\$66	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$102	\$511	\$38

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$1,932	\$2,315	\$0	\$0	\$1,272
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$166	\$27	\$255	\$86	\$2,212
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$384	\$0	\$20	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$175	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$16,633	\$16,219	\$13,787	\$10,242	\$6,649
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$360	\$592	\$171	\$73	\$177
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$11,239	\$22,166	\$19,727	\$8,531	\$4,284
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$170	\$27	\$254	\$77	\$634
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$32,970	\$33,061	\$29,494	\$29,382	\$16,502
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$0	\$84	\$40	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$15,361	\$29,192	\$38,505	\$16,952	\$16,370
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$0	\$97	\$303	\$40	\$2,274
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$6,014	\$22,909	\$69,150	\$34,445	\$5,173
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6210000	PURCHASED MATERIALS	\$234	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6210210	MATL-INV ADJUST ACCT	(\$56)	(\$359)	\$29	\$222	(\$236)
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$0	\$0	\$0	\$0	\$189
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$23,473	\$26,397	\$2,718	\$2,609	\$68
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$31	\$14	\$1,300	\$4,932
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$627	\$803	\$1,217	\$508	\$270
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$499,151	\$436,526	\$381,588	\$376,228	\$334,409
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$25,812	\$30,409	\$23,923	\$38,996	\$105,045
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6213015	MATL-OF FURNITURE	\$0	\$2,252	\$940	\$721	\$1,529
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$290	\$372	\$2,017	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$713	\$1,877	\$3,218	\$1,269	\$2,370
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$184	\$554	\$888	\$914	\$369
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$265	\$137	\$52	\$132	\$40
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213045	MATL-DIESEL FUEL	\$0	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213055	MATL-OIL&LUBRICANTS	\$71	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213060	MATL-VEHICLE PARTS	\$23	\$0	\$109	\$0	\$25
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213070	MATL-PARTS	\$0	\$786	\$472	\$130	\$212
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$22,267	\$36,826	\$43,299	(\$47,192)	\$33,201
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$9	\$0	\$47	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213115	MATL-ASPHALT	\$0	\$0	\$0	\$0	\$3,947
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$85	\$1,141	\$5,015	\$2,699
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$2,159	\$2,293	\$1,577	\$1,565	\$602
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$45	\$62	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213155	MATL-CATHODIC EQUIPM	\$0	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$27,788	\$16,173	\$6,069	\$10,145	\$5,914
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213200	MATL-CONSTRUCTION EQ	\$0	\$216	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213260	MATL-FITTINGS	\$718	\$350	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213285	MATL-GAS METERS	\$0	\$0	\$0	\$0	\$1,410
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213300	MATL-GASES-INDSTRIAL	\$52	\$285	\$3,230	\$2,066	\$1,239
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213345	MATL-LG PWR XFORMERS	\$0	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$13	\$0	\$18	\$18	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213370	MATL-MECHANICAL EQUIP	\$0	\$0	\$0	\$39	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213385	MATL-ELEC MISC	\$368	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$4,118	\$16,457	\$5,540	\$8,266	\$3,817
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$672	\$224	\$0	\$465	\$238
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213500	MATL-ROCK SAND DIRT	\$406	\$16	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$25	\$743	\$772	\$1,478	\$6,620

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$545	\$33	\$463	\$0	\$50
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6213525	MATL-METAL PIPE&FITG	\$0	\$0	\$0	\$1,823	\$1,644
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6215563	MI-PRECHRGDSTORESMAT	\$0	\$0	\$194	\$481	\$259
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6215565	MI-PRECHRGDFFSUPPL	\$23,164	\$27,003	\$20,164	\$23,291	\$23,441
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6215566	MI-OTHER PRECHRGDMAT	\$5,032	\$4,176	\$3,053	\$105,841	\$6,853
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6215567	MI-PIPE	\$8	\$49	\$37	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$6,537	\$2,125	\$2,180	\$4,821	\$509
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Supplemental Workforce	6220008	SRV-CONTRACTORS	\$0	\$0	\$3,715	\$2,875	\$3,147
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$1,180	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220020	SRV-AUDITING FEES	\$67	\$0	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$99,609	\$78,665	\$125,845	\$82,101	\$48,610
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220091	SRV-PEST CONTROL	\$0	\$0	\$204	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220190	SRV-SECURITY	\$11,830	\$0	\$0	\$0	\$78
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	(\$389)	\$0	\$44	\$95	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6220290	SRV-IT HELP DESK	\$0	\$0	\$0	\$0	\$8
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$183	\$373	\$0	\$1,373	\$1,673
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$49,588	\$31,290	\$31,400	\$31,481	\$21,304
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$228	\$981	\$955	\$985	\$1,952
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$51,095	\$14,830	\$25	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$5,934	\$5,751	\$0	\$0	\$180
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220403	SRV-PRINTNG ENVELOPES	\$1,402	\$1,583	\$0	\$0	\$1,894
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$1,432	\$1,025	\$1,406	\$2,309	\$2,740
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$615	\$1,732	\$4,341	\$1,721	\$176
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$103	\$25	\$39	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$436	\$317	\$172	\$703	\$234
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Supplemental Workforce	6220530	SRV-CONSTRUCTN OTHER	\$0	\$1,910	\$0	\$37,008	\$2,430
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220560	SRV-CONSTRUCTN PAVNG	\$0	\$2,434	\$54	(\$52)	\$226
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$3	\$11	\$0	\$49	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$42,429	\$29,832	\$5,628	\$19,833	\$4,638
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$294	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$42,883	\$18,649	\$16,263	\$25,731	\$2,780
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Related	6220790	SRV-MEDICAL	\$127	\$0	\$314	\$290	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$0	\$0	\$0	\$0	\$607
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220843	SRV-VEHICLE WASHING	\$14	\$0	\$20	\$49	\$13
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220850	SRV-VEH&EQUIP W/OPER	\$0	\$1,019	\$0	\$214	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$288	\$90	\$0	\$77	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$1,911	\$4,902	\$897	\$8,996	\$7,519
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Contract Services	6220880	SRV-CONSTR-GAS PIPE	\$0	\$8	\$0	(\$39,768)	\$5,099
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220900	SRV-TRASH COLLECTION	\$0	\$0	\$15,997	\$19,641	\$23,274
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220910	SRV-HAZ WASTE DISPOS	\$0	\$3,214	\$4,687	\$4,875	\$5,182
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6220920	SRV-SAFETY RELATED	\$4,909	\$630	\$0	\$81	\$187
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$27	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6221050	SRV-LABORATORY	\$0	\$518	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$0	\$336	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6230500	SRV-SAFETY EVENT	\$0	\$0	\$0	\$630	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$697	\$57	\$9	\$2,595	\$2,803
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6230610	SRV-WATER	\$320	\$101	\$810	\$572	\$73
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Purchased Services	6230630	SRV-UTILITIES	\$1,868	\$1,015	\$484	\$904	\$595
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$2,817	\$107	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$2,859	\$95	\$0	\$0	\$200

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$0	\$151	\$297	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Govt Payments	6280001	GOV PYMNTS-PERMITS	\$0	\$0	\$24	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$112	\$136	\$121	\$125
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$169,671	\$247,770	\$267,302	\$259,644	\$230,295
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$0	\$52	\$23
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$12,279	\$9,297	\$7,790	\$7,246	\$6,248
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$0	\$1	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	\$0	(\$0)	\$0	\$0	(\$2)
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Misc NL Costs	6400630	A&G-CORPREARCH	\$0	\$81	\$0	\$0	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Misc NL Costs	6405000	A&G-MISC GENERAL EXP	\$0	\$0	\$0	(\$3,838)	\$0
2FC002.000	CUSTOMER SERVICES FIELD - SUPERVISION	Non-Labor	Misc NL Costs	6405012	A&G-GOVT PMTS-PERMIT	\$178	\$671	\$846	\$708	\$761
<b>2FC002.000</b>	<b>CUSTOMER SERVICES FIELD - SUPERVISION</b>	<b>Non-Labor</b>	<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>		<b>\$1,247,085</b>	<b>\$1,195,789</b>	<b>\$1,166,003</b>	<b>\$1,115,272</b>	<b>\$974,273</b>
<b>2FC002.000</b>	<b>CUSTOMER SERVICES FIELD - SUPERVISION</b>	<b>TOTAL</b>		<b>TOTAL ALL</b>		<b>\$11,400,277</b>	<b>\$12,070,060</b>	<b>\$13,684,453</b>	<b>\$13,045,466</b>	<b>\$11,117,765</b>
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$1,631,358	\$1,639,139	\$1,569,081	\$1,584,870	\$1,257,626
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$1,771	\$1,611	(\$103)	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$3,311	(\$719)	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$0	\$0	\$0	\$3,249	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$4,985,396	\$5,195,215	\$5,107,477	\$5,320,753	\$5,312,351
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$781,358	\$628,167	\$745,619	\$606,284	\$777,362
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$199,308	\$154,339	\$165,937	\$82,482	\$166,440
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$3,634	\$9,163	\$16,188	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$0	\$0	\$12	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Other Labor	6110256	SAL-MISC	\$34,588	\$0	\$885	\$48,352	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$2,427	\$1,664	\$145	\$68	\$0
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$1,380,519	\$1,334,180	\$1,263,111	\$1,224,134	\$1,248,790
<b>2FC003.000</b>	<b>CUSTOMER SERVICES FIELD - DISPATCH</b>	<b>Labor</b>	<b>Labor</b>	<b>TOTAL LABOR</b>		<b>\$9,020,359</b>	<b>\$8,966,789</b>	<b>\$8,867,632</b>	<b>\$8,870,192</b>	<b>\$8,762,569</b>
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	\$0	\$0	\$0	\$245
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$377	\$367	\$265	\$86	\$170
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$0	\$236	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$2,379	\$0	\$0	\$0	\$2,057
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$42	\$51	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$712	\$216	\$0	\$21	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$1,169	\$868	\$352	\$446	\$338
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$1,089	\$121	\$24	\$397	\$2,574
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$28,344	\$18,978	\$18,871	\$18,371	\$16,262
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$78	\$13	\$21	\$14	\$14
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$4,367	\$4,608	\$6,457	\$4,738	\$2,015
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$8,335	\$4,051	\$9,188	\$3,544	\$5,899
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$20	\$1,356	\$0	\$76	\$7,273
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6211380	MATL-ELECTRIC PARTS	\$8	\$0	\$0	\$92	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$75,937	\$74,282	\$38,636	\$66,850	\$58,014
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$142	\$1,123	\$0	\$584	\$1,492
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$2,412	\$499	\$3,345	\$1,983	\$3,322
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$1,410	\$525	\$2,226	\$10
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$1,183	\$8,514	\$5,061	\$1,494	\$364
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$45	\$873	\$434	\$250	\$328
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213070	MATL-PARTS	\$0	\$0	\$55	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$0	\$364	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$5,802	\$3,401	\$4,900	\$2,100	\$4,050
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$10	\$0	\$0	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$1,365	\$1,492	\$656	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$12,905	\$5,428	\$3,729	\$2,821	\$5,245
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$4	\$60	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$0	\$0	\$0	\$499	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$516	\$1,104	\$945	\$1,346	\$621
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$44	\$0	\$66	\$91	\$56
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$658	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$20,165	\$11,552	\$12,875	\$10,328	\$10,932
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$1,616	\$0	\$1,978	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$191	\$0	\$367	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$21,668	\$34,744	\$41,538	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$731	\$31	\$0	\$3,040
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$30	\$95	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$329	\$4,368	\$812	\$2,131	\$1,727
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Supplemental Workforce	6220530	SRV-CONSTRUCTN OTHER	\$649	\$0	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$142	\$216	\$4,094	\$3,360	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$2,798	\$5,075	\$2,113	\$6,532	\$2,582
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Purchased Services	6220850	SRV-VEH&EQUIP W/OPER	\$0	\$2,745	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$337	\$0	\$300	\$207	\$82
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$2,739	\$94	\$227	\$171	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Office Furn Supplies	6220960	SRV-MOVING	\$0	\$0	\$1,020	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Computer Related	6220990	SRV-CMPTR HW MNT&LS	\$0	\$1,980	\$0	\$4,894	\$1,944
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$23	\$0	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$109	\$222	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$19	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$942	\$0	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6320000	TELE-COMMUNICATIONS	\$248	\$81	\$59	\$3,081	\$6
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$22,579	\$19,222	\$19,304	\$21,946	\$16,781
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$0	\$5,007	\$8,171
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$832	\$485	\$278	\$190	\$53
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$2,060	\$2,073	\$2,369
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	\$0	(\$1)	\$0	\$0	\$0
2FC003.000	CUSTOMER SERVICES FIELD - DISPATCH	Non-Labor	Misc NL Costs	64000630	A&G-CORPRECARCH	\$0	\$81	\$0	\$0	\$0
<b>2FC003.000</b>	<b>CUSTOMER SERVICES FIELD - DISPATCH</b>	<b>Non-Labor</b>	<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>		<b>\$219,547</b>	<b>\$212,814</b>	<b>\$180,130</b>	<b>\$170,871</b>	<b>\$158,037</b>
<b>2FC003.000</b>	<b>CUSTOMER SERVICES FIELD - DISPATCH</b>	<b>TOTAL</b>	<b>TOTAL ALL</b>			<b>\$9,239,906</b>	<b>\$9,179,603</b>	<b>\$9,047,762</b>	<b>\$9,041,063</b>	<b>\$8,920,606</b>
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$5,739,556	\$5,863,322	\$5,770,900	\$5,556,263	\$5,063,254
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$271,330	\$209,574	\$196,262	\$189,913	\$136,595
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$226	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$2,234,218	\$2,198,536	\$2,236,753	\$2,258,747	\$2,280,330
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$98	\$652	\$0	\$2,580	\$230
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$2,425	\$14,119	\$46,279	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$62,647	\$66,356
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$4,878	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Labor	Other Labor	6110256	SAL-MISC	\$6,114	\$0	\$354	\$0	\$3,233
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$1,491,492	\$1,448,428	\$1,370,416	\$1,292,812	\$1,254,810
<b>2FC004.000</b>	<b>CUSTOMER SERVICES FIELD - SUPPORT</b>	<b>Labor</b>	<b>Labor</b>	<b>TOTAL LABOR</b>		<b>\$9,745,458</b>	<b>\$9,734,631</b>	<b>\$9,620,964</b>	<b>\$9,367,840</b>	<b>\$8,804,807</b>
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6120000	EMPLOYEE BENEFITS	\$0	\$0	(\$26)	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$471	\$1,194	\$1,326	\$1,038	\$1,275
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6120030	EMP BEN-MED RETIREES	\$0	\$1,781	\$0	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$79	\$59	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$1,778	\$108	\$0	\$11,758	\$6,158
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$197	\$241	\$4,456	\$1,607	\$4,613
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$2,374	\$7,525	\$3,648	\$276	\$192
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$2,816	\$1,277	\$848	\$3,967	\$3,277
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$39	\$11	\$31	\$15	\$39
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$98,546	\$59,361	\$25,900	(\$4,275)	\$59,322
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$955	\$793	\$529	\$457	\$780
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$12,527	\$19,635	\$16,834	\$18,057	\$16,277
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$219	\$0	\$350
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$80	\$90	\$73	\$123	\$254
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$51,716	\$75,797	\$87,918	\$57,442	\$41,178
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$498	\$0	\$2,368	\$1,903	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$3,866	\$1,101	\$0	\$411	\$484
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6130040	EMP OTH-LIVNG EXP-IM	\$0	\$0	\$0	\$0	\$215
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$8,573	\$40,060	\$50,312	\$24,133	\$29,667
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6210000	PURCHASED MATERIALS	\$0	\$0	\$0	\$1,253	\$1,260
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6211380	MATL-ELECTRIC PARTS	\$0	\$1,399	\$82	\$0	\$9
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$282	\$0	\$0	\$0	\$129
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$196	\$0	\$3,346	\$916
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$6,330	\$10,152	\$13,949	\$12,890	\$6,665
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$33,588	\$30,905	\$37,670	\$22,570	\$25,558
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$10,138	\$5,500	\$3,388	\$2,079	\$876
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$0	\$0	\$4,901	\$2,019
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$19	\$337	\$306	\$1,043	\$376
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$21	\$245	\$388	\$587	\$447
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$185,703	\$158,144	\$207,269	\$69,854	\$140,947
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$34	\$52	\$312	\$376	\$356
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213050	MATL-NGV FUEL	\$0	\$0	\$0	\$0	\$38
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213060	MATL-VEHICLE PARTS	\$0	\$0	\$24	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$2,481	\$1,695	\$2,151	\$2,451	\$932
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$6,558	\$21,547	\$74,882	\$19,109	\$24,276
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$50	\$0	\$0	\$33	\$225
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$0	\$78	\$1,263	\$516
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$327	\$0	\$4,278	\$3,047
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$95,770	\$130,063	\$13,355	\$20,697	\$2,330
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$0	\$0	\$0	\$24	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$340	\$73	\$502	\$620	\$811
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$0	\$0	\$0	\$0	\$3,307
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$0	\$0	\$0	\$0	\$1,399
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$0	\$1,169	\$0	\$945	\$1,575
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$9	\$874	\$0	\$121
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6215567	MI-PIPE	\$0	\$0	\$459	\$342	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$10,702	\$13,849	\$9,806	\$13,747	\$5,658
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Supplemental Workforce	6220001	SRV-CNTRCTRS-ADVISRY	\$0	\$251	\$241	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$1,582	\$0	\$0	\$0	\$4,241
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$3,419	\$5,882	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$938	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$102,694	\$98,514	\$122,281	\$87,912	\$56,771
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$1,507	\$1,490	\$0	\$0	\$0



Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220190	SRV-SECURITY	\$15,282	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$126,932	\$37,360	\$46,120	\$67,294	\$54,830
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$280	\$933	\$551	\$956	\$723
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$128,201	\$167,464	\$50,781	\$6,466	\$62,384
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$1,164	\$267	\$204	\$180	\$625
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$120	\$0	\$31	\$426	\$287
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$107	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,616	\$17,143	\$17,072	\$25,764	\$28,454
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$0	\$0	\$418	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$3	\$45	\$0	\$482	\$17
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Supplemental Workforce	6220530	SRV-CONSTRUCTN OTHER	\$0	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220535	SRV-GOVT PERMITS	\$0	\$0	\$0	\$0	\$9
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$66	\$43	\$349	\$57	\$118
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$39,910	\$8,308	\$1,018	\$2,040	\$1,999
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$402	\$0	\$0	\$117,435
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$17,522	\$14,782	\$11,944	\$5,926	\$3,636
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Related	6220790	SRV-MEDICAL	\$0	\$96	\$0	\$0	\$6,059
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$0	\$0	\$0	\$0	\$500
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$0	\$0	\$369
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$0	\$0	\$9,676	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$3,287	\$3,900	\$4,575	\$3,532	\$1,960
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$78,844	\$151,955	\$94,021	\$48,670	\$51,012
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Contract Services	6220880	SRV-CONSTR-GAS PIPE	\$0	\$0	\$0	\$0	\$1,035
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$921	\$27	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6220990	SRV-CMPTR HW MNT&LS	\$0	\$1,722	\$4,782	\$0	\$69
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6230030	SRV-ADVERT LIT	\$0	\$1,012	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$47,392	\$64,856	\$23,558	\$28,659	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$5,104	\$1,308	\$19,757	\$748	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$0	\$0	\$0	\$1,354	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$1,151	\$2,791	\$3,645	\$9,671	\$6,512
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$1,683	\$8,264	\$3,685	\$12,614	\$6,435
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$4,687	\$8,232	\$9,257	\$7,968	\$8,525
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$27,087	\$2,836	\$5,588	\$3,910	\$828
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$144	\$0	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Govt Payments	6280001	GOV PYMNTS-PERMITS	\$0	\$12,143	\$32,589	\$48,348	\$21,244
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$64	\$285	\$723	\$46	\$39
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$83,090	\$96,631	\$148,546	\$152,402	\$111,318
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$30	\$141	\$0	\$2,930	\$4,063
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$540	\$487	\$298	\$236	\$298
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320007	TELE-DATA	\$0	\$0	\$0	\$0	\$14,155
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Telephone Expenses	6320010	MEASURED BUSINESS LI	\$120	\$0	\$0	\$2,084	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Misc NL Costs	6350710	CREDIT FOR CASH COLL	(\$41,583)	(\$12,388)	(\$4,055)	(\$2,290)	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Misc NL Costs	6405012	A&G-GOVT PMTS-PERMIT	\$0	\$136	\$0	\$0	\$0
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$1,190,356	\$1,281,955	\$1,157,568	\$827,860	\$953,821
2FC004.000	CUSTOMER SERVICES FIELD - SUPPORT	TOTAL	TOTAL	TOTAL ALL	TOTAL ALL	\$10,935,814	\$11,016,586	\$10,778,533	\$10,195,701	\$9,758,628
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110010	SAL-EXEC	\$0	\$0	\$18	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$629	\$1,086	(\$1,292)	(\$1,766)	\$414
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$0	\$0	\$0	\$259	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$6,220,162	\$6,128,569	\$5,717,957	\$5,775,826	\$5,573,196
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$68,261	\$83,797	\$62,075	\$13,763	\$10,998

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$207	\$11	\$491	\$3	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$16,167,436	\$17,042,211	\$18,078,845	\$0	\$1,496,000
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$1,782	\$2,664
2FC005.000	METER READING - OPERATIONS	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$18,256,757	\$16,205,121
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$13,529	\$16,878	\$25,079	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor T&1/2	6110183	SAL-PT TIME UN T&H	\$0	\$0	\$0	\$17,082	\$8,094
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor DT	6110190	SAL-TEMP P-T D/T	\$143	\$365	\$537	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Overtime Labor DT	6110193	SAL-PT TIME UN D/T	\$0	\$0	\$0	\$83	\$0
2FC005.000	METER READING - OPERATIONS	Labor	Other Labor	6110256	SAL-MISC	\$126,596	\$2,144	\$0	\$180,425	\$957
2FC005.000	METER READING - OPERATIONS	Labor	Other Labor	6110270	SAL-SEVERENCE	\$0	\$0	\$0	\$0	\$6,232
2FC005.000	METER READING - OPERATIONS	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$5,056	\$3,132	\$1,455	\$1,278	\$919
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$4,084,185	\$4,069,028	\$3,967,326	\$3,881,703	\$3,873,223
<b>2FC005.000</b>	<b>METER READING - OPERATIONS</b>	<b>Labor</b>	<b>Labor</b>	<b>TOTAL LABOR</b>		<b>\$26,686,204</b>	<b>\$27,347,221</b>	<b>\$27,852,490</b>	<b>\$28,127,196</b>	<b>\$27,177,816</b>
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120000	EMPLOYEE BENEFITS	\$317	\$0	\$52	\$0	\$33
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$0	\$0	\$0	\$88,918	\$75,353
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120018	EMP BEN-PRE-EMP PHYS	\$0	\$0	\$57	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120053	EMP BEN-MISC	\$317	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$1,210	\$3,676	\$696
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$423	\$663	\$686	\$6,793	\$5,270
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$2,066	\$132	\$291
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Related	6125002	EXEC BEN-LT INCENTIV	\$0	\$0	\$27	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$0	\$0	\$178	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$20,389	\$19,315	\$1,759	\$21,366	\$18,450
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$23,084	\$20,994	\$29,845	\$28,469	\$8,929
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$928,481	\$821,717	\$963,951	\$1,043,819	\$1,107,601
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$0	\$0	\$406	\$0	\$24
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$120	\$32	\$0	\$207	\$150
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$195	\$145	\$1,141	\$312
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$33,047	\$32,120	\$68,387	\$78,120	\$26,724
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$19,037	\$20,501	\$47,405	\$37,203	\$24,761
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6210005	AVG UNIT PRICE ADJUS	\$0	\$0	\$0	\$171	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6211380	MATL-ELECTRIC PARTS	\$0	\$0	\$0	\$0	\$49
2FC005.000	METER READING - OPERATIONS	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$24,171	\$23,830	\$26,466	\$27,329	\$24,215
2FC005.000	METER READING - OPERATIONS	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$536	\$23	\$0	\$81	\$64
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$30,585	\$29,124	\$22,911	\$26,363	\$18,721
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$231	\$651	\$153	\$697	\$442
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6213015	MATL-OFc FURNITURE	\$1,578	\$3,108	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$0	\$277	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$15	\$79	\$350	\$66	\$62
2FC005.000	METER READING - OPERATIONS	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$0	\$0	\$0	\$42	\$41
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$12	\$0	\$0	\$0	\$22
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213065	MATL-TIRES & RECAPS	\$0	\$81	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$0	\$43	\$2,575	\$5
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$13,875	\$13,715	\$28,544	\$8,961	\$2,251
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$0	\$105	\$692	\$8,809	\$3,734
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$46	\$0	\$208	\$397	\$54
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$1,078	\$2,134	\$3,174	\$1,986	\$2,348
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$102	\$51	\$0	\$14	\$295
2FC005.000	METER READING - OPERATIONS	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$10,146	\$5,667	\$1,276	\$277	\$621

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213305	MATL-GASKETS	\$0	\$0	\$0	\$10	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$6,776	\$1,239	\$1,619	\$1,485	\$2,025
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213365	MATL-MEASURMT INSTRU	\$0	\$0	\$0	\$124	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213385	MATL-ELEC MISC	\$67	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$4,952	\$5,155	\$5,965	\$4,331	\$2,141
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$4,794	\$5,065	\$144	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$103	\$0	\$0	\$77	\$435
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$160,408	\$116,692	\$147,971	\$131,056	\$97,962
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213590	MATL-JANITORIAL SUPP	\$0	\$3	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6213680	MATL-CUSTOMER EVENT	\$0	\$0	\$0	\$0	\$21
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6215566	MI-OTHER PRECHRGDMAT	\$16,698	\$16,073	\$19,725	\$21,793	\$19,567
2FC005.000	METER READING - OPERATIONS	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$118,651	\$122,274	\$138,478	\$98,726	\$67,316
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220000	PURCHASED SERVICES	\$0	\$324	\$0	\$33	\$310
2FC005.000	METER READING - OPERATIONS	Non-Labor	Supplemental Workforce	6220008	SRV-CONTRACTORS	\$122	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$462	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$11,572	\$20,439	\$8,895	\$8,786	\$9,219
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220091	SRV-PEST CONTROL	\$20,370	\$10,816	\$21,792	\$23,737	\$14,216
2FC005.000	METER READING - OPERATIONS	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$0	\$0	\$98
2FC005.000	METER READING - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$42	\$0	\$0	\$10	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$245	\$560	\$305	\$238	\$36
2FC005.000	METER READING - OPERATIONS	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$57	\$0	\$707	\$163	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220432	SRV-MAIL-O/NIGHT EXP	\$0	\$0	\$0	\$44	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$101	\$99	\$98	\$1,015	\$53
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$140	\$113	\$69	\$197	\$67
2FC005.000	METER READING - OPERATIONS	Non-Labor	Supplemental Workforce	6220530	SRV-CONSTRUCTN OTHER	\$0	\$0	\$114	\$2,637	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$288	\$265	\$1,035	\$2,215	\$1,288
2FC005.000	METER READING - OPERATIONS	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$3,908	\$6,299	\$6,022	\$2,198	\$97
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$44	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$124	\$188	\$208	\$123	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220846	SRV-VEHICLE TOWING	\$5,415	\$5,806	\$6,257	\$9,528	\$8,354
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$146,815	\$165,866	\$188,599	\$191,293	\$197,710
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$1,527	\$1,380	\$440	\$3,739	\$214
2FC005.000	METER READING - OPERATIONS	Non-Labor	Purchased Services	6220920	SRV-SAFETY RELATED	\$22	\$0	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$0	\$23	\$0	\$53	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6230434	SRV-COURIER	\$0	\$0	\$0	\$40	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6230440	SRV-EXPRESS POSTAGE	\$0	\$0	\$0	\$298	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Office/Furn Supplies	6230460	SRV-BILL POSTAGE	\$42	\$0	\$0	\$16	\$62
2FC005.000	METER READING - OPERATIONS	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$1,872	\$0	\$355	\$1,315	\$355
2FC005.000	METER READING - OPERATIONS	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$0	\$1,043	\$0	\$0	\$0
2FC005.000	METER READING - OPERATIONS	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$18,494	\$14,331	\$14,476	\$15,748	\$15,276
2FC005.000	METER READING - OPERATIONS	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$2,585	\$1,050	\$302	\$271	\$348
2FC005.000	METER READING - OPERATIONS	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	\$0	\$0	(\$26)	(\$8)	\$0
<b>2FC005.000</b>	<b>METER READING - OPERATIONS</b>	<b>Non-Labor</b>		<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>	<b>\$1,634,286</b>	<b>\$1,489,205</b>	<b>\$1,763,365</b>	<b>\$1,909,356</b>	<b>\$1,758,686</b>
<b>2FC005.000</b>	<b>METER READING - OPERATIONS</b>	<b>TOTAL</b>		<b>TOTAL ALL</b>		<b>\$28,320,490</b>	<b>\$28,836,426</b>	<b>\$29,615,855</b>	<b>\$30,036,552</b>	<b>\$28,936,502</b>
2FC006.000	METER READING - CLERICAL	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$0	\$940	\$0	\$0	\$0
2FC006.000	METER READING - CLERICAL	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$923,904	\$890,407	\$899,940	\$917,059	\$912,112
2FC006.000	METER READING - CLERICAL	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$10,612	\$8,784	\$901	\$8,620	(\$248)
2FC006.000	METER READING - CLERICAL	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$11,976	\$6,647	\$0	\$0
2FC006.000	METER READING - CLERICAL	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$3,626	(\$3,541)
2FC006.000	METER READING - CLERICAL	Labor	Other Labor	6110256	SAL-MISC	\$6,091	\$0	\$0	\$9,100	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC006.000	METER READING - CLERICAL	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$96	\$0	\$0	\$0	\$0
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$170,155	\$159,272	\$150,734	\$150,239	\$150,963
<b>2FC006.000</b>	<b>METER READING - CLERICAL</b>	<b>Labor</b>		<b>Labor</b>	<b>TOTAL LABOR</b>	<b>\$1,111,798</b>	<b>\$1,070,439</b>	<b>\$1,058,221</b>	<b>\$1,088,645</b>	<b>\$1,059,286</b>
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	\$206	(\$3,666)	\$0	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$0	\$0	\$0	\$43	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$0	\$23	\$0	\$51	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$2,024	\$1,307	\$0	\$215	\$308
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$349	\$539	\$196	\$212	\$124
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$200	\$497	\$5,160	\$3,178	\$1,236
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$0	\$188	\$0	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$9,254	\$9,753	\$10,600	\$10,453	\$10,314
2FC006.000	METER READING - CLERICAL	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$0	\$0	\$0	\$55
2FC006.000	METER READING - CLERICAL	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$0	\$0	\$0	\$0	\$87
2FC006.000	METER READING - CLERICAL	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$0	\$0	\$0	\$113
2FC006.000	METER READING - CLERICAL	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$5,045	\$354	\$1,204	\$1,220	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$137	\$0	\$0	\$0	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$196	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$3,633	\$6,675	\$6,657	\$6,629	\$7,686
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$137	\$1,080	\$207	\$195	\$243
2FC006.000	METER READING - CLERICAL	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$0	\$979	\$181	\$0	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$195	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Telephone Expenses	6320000	TELECOMMUNICATIONS	\$0	\$0	\$6	\$0	\$0
2FC006.000	METER READING - CLERICAL	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$227	\$31	\$299	\$104	\$29
2FC006.000	METER READING - CLERICAL	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$0	\$0	\$4	\$0	\$0
<b>2FC006.000</b>	<b>METER READING - CLERICAL</b>	<b>Non-Labor</b>		<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>	<b>\$21,006</b>	<b>\$21,444</b>	<b>\$21,039</b>	<b>\$22,692</b>	<b>\$20,196</b>
<b>2FC006.000</b>	<b>METER READING - CLERICAL</b>	<b>TOTAL</b>		<b>TOTAL ALL</b>		<b>\$1,132,804</b>	<b>\$1,091,883</b>	<b>\$1,079,260</b>	<b>\$1,111,336</b>	<b>\$1,079,481</b>
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$2,362,057	\$2,132,160	\$2,445,514	\$2,382,414	\$2,344,897
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$6,511	\$8,064	\$255	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$0	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$3,724	\$4,252	\$6,503	\$7,819	\$8,036
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$180	\$157	\$634	\$158	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$253,127	\$516,108	\$317,823	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$263,508	\$299,834
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$27,339	\$13,337
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$1,992	\$2,560	\$2,865	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Overtime Labor T&1/2	6110181	SAL-PT TIME MGT T&H	\$0	\$0	\$0	\$6,676	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Overtime Labor T&1/2	6110183	SAL-PT TIME UN T&H	\$0	\$0	\$0	\$2,371	\$200
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Other Labor	6110256	SAL-MISC	\$4,960	\$0	\$0	\$4,854	\$4,100
2FC007.000	METER READING - SUPERVISION & TRAINING	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$305	\$418	\$0	\$0	\$0
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$475,757	\$465,618	\$460,694	\$431,492	\$443,821
<b>2FC007.000</b>	<b>METER READING - SUPERVISION &amp; TRAINING</b>	<b>Labor</b>		<b>Labor</b>	<b>TOTAL LABOR</b>	<b>\$3,108,612</b>	<b>\$3,129,336</b>	<b>\$3,234,289</b>	<b>\$3,126,631</b>	<b>\$3,114,224</b>
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Related	6120000	EMPLOYEE BENEFITS	\$0	\$492	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$0	\$0	\$354	\$2,076	\$1,275
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Related	6120030	EMP BEN-MED RETIREES	\$0	\$0	\$577	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Related	6120075	EMP BEN-RANDOM TEST	\$50	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Related	6120093	EMP BEN-PRFP F/MGMT	\$0	\$0	\$21	\$118	\$58
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$48,774	\$49,032	\$42,727	\$60,546	\$42,878
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$66	\$292	\$73,150	\$117,612	\$97,926
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$108	\$0	\$0	\$25
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$60	\$108	\$0	\$0	\$16

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$7,562	\$5,356	\$18,666	\$4,503	\$4,009
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$251	\$147	\$501	\$137	\$92
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$153,542	\$155,693	\$124,128	\$116,969	\$71,785
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$0	\$0	\$22	\$100	(\$24)
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$222	\$368	\$366	\$137	\$232
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$1,513	\$1,191	\$758	\$857	\$1,576
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$0	\$343	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$16,656	\$32,780	\$24,480	\$10,197	\$11,181
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$416	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$20,403	\$14,591	\$22,113	\$12,457	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$57	\$678	\$1,847	\$851	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERIALS	\$388	\$322	\$45	\$238	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$110,625	\$105,457	\$34,833	\$1,763	\$1,043
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$4,973	\$3,743	\$6,860	\$8,236	\$6,025
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$447	\$0	\$0	\$70	\$22
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$484	\$486	\$105	\$2,362	\$34
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$332	\$1,308	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$10	\$0	\$11	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213060	MATL-VEHICLE PARTS	\$0	\$0	\$49	\$0	\$25
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$1,405	\$3,150	\$2,642	\$1,470	\$4,362
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$26	\$582	\$1,102	\$2,166	\$1,102
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$17	\$120	\$0	\$792	\$38
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$36	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$32	\$32	\$113	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$15,001	\$4,985	\$5,089	\$15,368	\$618
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$13	\$9	\$131	\$8	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$538	\$37	\$872	\$125	\$55
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$927	\$81	\$2,274	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$1,699	\$0	\$0	\$0	\$1,709
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$10,741	\$9,122	\$16,972	\$18,264	\$18,025
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$10,202	\$4,254	\$13,942	\$14,730	\$8,876
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$2,123	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$0	\$0	\$0	\$586	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$0	\$0	\$12,400	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$13,685	\$12,938	\$16,406	\$13,479	\$10,207
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$174	\$0	\$900
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$467	\$737	\$428	\$434	\$157
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$18	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,747	\$6,637	\$12,437	\$34,144	\$11,662
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$71	\$22	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$20	\$0	\$70	\$30	\$72
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$13	\$0	\$5	\$43	\$55
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$6,966	\$12,869	\$4,966	\$6,628	\$74
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$0	\$0	\$73	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$374	\$421	\$391	\$507	\$650
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$0	\$194	\$2,600	\$53	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6230030	SRV-ADVERT LIT	\$0	\$0	\$0	\$153	\$391
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$1,431	\$0	\$11	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$572	\$388	\$163	\$78
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$27,283	\$0	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Govt Payments	6280001	GOV PYMNTS-PERMITS	\$44	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$0	\$0	\$47	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$105	\$0	\$0	\$0	\$0
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$17,813	\$14,344	\$14,874	\$16,263	\$14,638
2FC007.000	METER READING - SUPERVISION & TRAINING	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$557	\$200	\$49	\$14	\$35
<b>2FC007.000</b>	<b>METER READING - SUPERVISION &amp; TRAINING</b>	<b>Non-Labor</b>		<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>	<b>\$452,337</b>	<b>\$470,837</b>	<b>\$460,368</b>	<b>\$465,171</b>	<b>\$311,881</b>
<b>2FC007.000</b>	<b>METER READING - SUPERVISION &amp; TRAINING</b>	<b>TOTAL</b>		<b>TOTAL ALL</b>		<b>\$3,560,949</b>	<b>\$3,600,173</b>	<b>\$3,694,657</b>	<b>\$3,591,803</b>	<b>\$3,426,105</b>
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$1,179,715	\$991,709	\$1,107,505	\$1,381,545	\$1,292,988
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$452	\$0	\$618	\$5,139	\$471
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$0	\$0	\$0	\$91
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$50,168	\$35,657	\$31,243	\$32,827	\$0
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110090	SAL-CLERICAL/TECH T&H	\$274	\$128	\$132	\$0	\$0
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$148	\$72	\$2,695	(\$120)	\$66
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$0	\$0	\$0	\$0	\$262
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$0	\$20,952	\$1,008	\$0	\$0
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$6,191	\$21,592	\$51,171	\$0	\$0
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$44,127	\$136,461
2FC008.000	METER READING - SUPPORT	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$10,221	\$0
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$0	\$328	\$268	\$0	\$0
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110181	SAL-PT TIME MGT T&H	\$0	\$0	\$0	\$302	\$2,772
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor T&1/2	6110182	SAL-PT TIME C&T T&H	\$0	\$0	\$0	\$29	\$0
2FC008.000	METER READING - SUPPORT	Labor	Overtime Labor DT	6110191	SAL-PT TIME MGT D/T	\$0	\$0	\$0	\$0	\$176
2FC008.000	METER READING - SUPPORT	Labor	Other Labor	6110256	SAL-MISC	\$0	\$0	\$21,573	\$1,537	\$2,553
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$223,517	\$187,112	\$202,013	\$236,245	\$238,636
<b>2FC008.000</b>	<b>METER READING - SUPPORT</b>	<b>Labor</b>		<b>Labor</b>	<b>TOTAL LABOR</b>	<b>\$1,460,466</b>	<b>\$1,257,550</b>	<b>\$1,418,227</b>	<b>\$1,711,852</b>	<b>\$1,674,476</b>
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$0	\$0	\$0	\$303	\$383
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$0	\$118	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$0	\$24	\$0	\$25	\$560
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$0	\$102	\$25
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$874	\$451	\$0	\$1,412	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$4,749	\$5,431	\$998	\$6,336	\$8,522
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$640	\$1,048	\$2,866	\$439	\$540
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$90	\$0	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$38,065	\$29,248	\$52,930	\$61,043	\$57,867
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$31	\$5	\$13	\$8	\$72
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$166	\$90	\$169	\$863	\$638
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$2,310	\$191	\$674	\$150	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$203	\$265	\$504	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$277	\$137	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$8,174	\$2,671	\$1,880	\$6,099	\$1,719
2FC008.000	METER READING - SUPPORT	Non-Labor	Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$0	\$950
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$4,662	\$4,763	\$241	\$0	\$4,946
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$1,657	\$223	\$93	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6211380	MATL-ELECTRIC PARTS	\$0	\$0	\$3	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$104	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$471	\$442	\$371	\$919	\$2,696
2FC008.000	METER READING - SUPPORT	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$4,842	\$3,738	\$2,896	\$2,955	\$3,162
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$72	\$1,095	\$429	\$4,880	\$419
2FC008.000	METER READING - SUPPORT	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$1,052	\$3,703	\$266	\$6,232
2FC008.000	METER READING - SUPPORT	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$719	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$64,585	\$1,585	\$0	\$955	\$977
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$20,891	\$2,099	\$730	\$218	\$519
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$16	\$119	\$209	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213070	MATL-PARTS	\$16,498	\$1,937	\$4,778	\$525	\$2,264
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$0	\$7,771	\$1,902	\$2,208
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$21,114	\$2,214	\$32,568	\$364	\$5,640
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$0	\$0	\$225	\$258	\$602
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$0	\$136	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$0	\$0	\$0	\$182
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$0	\$0	\$34	\$40
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213160	MATL-CHARTS	\$0	\$0	\$0	\$0	\$8
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$4,378	\$19,241	\$4,075	\$9,390	\$16,606
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213325	MATL-HARDWARE	\$0	\$0	\$0	\$55	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213360	MATL-LOCKS	\$0	\$33	\$13	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$0	\$384
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$3,559	\$29,884	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213500	MATL-ROCK SAND DIRT	\$839	\$0	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$0	\$3,718	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$3,044	\$1,419	\$2,827	\$2,351	\$1,336
2FC008.000	METER READING - SUPPORT	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$595	\$39	\$19	\$0	\$193
2FC008.000	METER READING - SUPPORT	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$219	\$30	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$362	\$14,318	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$0	\$0	\$12,400	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$9,937	\$18,250	\$19,270	\$19,187	\$18,772
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$0	\$1,081	\$2,836	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220091	SRV-PEST CONTROL	\$109	\$0	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$120,220	\$93,099	\$93,158	\$94,898	\$379
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6220270	SRV-IT-CONSULTING	\$0	\$0	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$383	\$0	\$718	\$183	\$3,761
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$30	\$264	\$0	\$174	\$30
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$1,031	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220421	SRV-COPY-ENGINEERING	\$8	\$0	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,076	\$1,187	\$7,386	\$5,353	\$4,790
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$18	\$49	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$16	\$0	\$0	\$0	\$100
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$19	\$284	\$42	\$114	\$98
2FC008.000	METER READING - SUPPORT	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$48,033	\$0	\$25,606	\$1,254	\$118
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$5,998	\$3,241	\$2,420	\$2,098	\$2,869
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Related	6220790	SRV-MEDICAL	\$0	\$0	\$0	\$0	\$6,059
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220810	SRV-CUSTOMER SVCS	\$0	\$1,898	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$538	\$632	\$742	\$9,984	\$295
2FC008.000	METER READING - SUPPORT	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$0	\$654	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6220990	SRV-CMPTR HW MNT&LS	\$488,457	\$218,129	\$233,586	\$197,576	\$177,612
2FC008.000	METER READING - SUPPORT	Non-Labor	Communication/Adv Svcs	6230030	SRV-ADVERT LIT	\$0	\$0	\$0	\$5,141	\$1,329
2FC008.000	METER READING - SUPPORT	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$198	\$0	\$57
2FC008.000	METER READING - SUPPORT	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$554	\$0	\$2,058	\$1,242	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Related	6230555	SRV-RECRUITING ADV	\$709	\$0	\$853	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$11,123	\$7,835	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$317	\$0	\$0	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$193	\$0	\$0	\$0	\$0

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320000	TELE-COMMUNICATIONS	\$1,321	\$2,872	\$7,861	\$8,320	\$1,360
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$0	\$0	\$0	\$0	\$503
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$12,427	\$10,953	\$11,666	\$10,151	\$8,090
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$0	\$9,408	\$14,583
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$458	\$79	\$45	\$71	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320005	TELE-PBX SERVICES	\$0	\$0	\$0	\$0	\$6,084
2FC008.000	METER READING - SUPPORT	Non-Labor	Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$0	\$2,916	\$0
2FC008.000	METER READING - SUPPORT	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$904,767	\$484,118	\$543,419	\$474,893	\$366,577
2FC008.000	METER READING - SUPPORT	TOTAL		TOTAL ALL		\$2,365,234	\$1,741,668	\$1,961,646	\$2,186,744	\$2,041,053
	<b>SHARED SERVICES TOTAL</b>					<b>\$2,037,146</b>	<b>\$1,881,159</b>	<b>\$1,615,220</b>	<b>\$1,582,341</b>	<b>\$1,571,354</b>
2200-0942	CS FIELD STAFF MANAGER	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$1,520,405	\$1,448,033	\$1,286,316	\$1,268,414	\$1,219,599
2200-0942	CS FIELD STAFF MANAGER	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$44,360	\$29,847	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$33,084	\$32,199	\$33,150	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$33,984	\$33,072
2200-0942	CS FIELD STAFF MANAGER	Labor	Other Labor	6110256	SAL-MISC	\$0	\$0	\$0	\$0	\$297
		Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$288,731	\$263,962	\$219,163	\$208,514	\$208,243
2200-0942	CS FIELD STAFF MANAGER	Labor	Labor	Labor	TOTAL LABOR	\$1,886,580	\$1,774,040	\$1,538,630	\$1,510,912	\$1,461,211
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$2	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$0	\$91	\$77
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$0	\$87
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$1,726	\$2,065	\$3,536	\$915	\$452
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$103	\$511	\$83	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$31	\$7	\$351	\$84	\$49
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$7	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$31,285	\$19,468	\$20,229	\$23,587	\$22,987
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$296	\$386	\$286	\$157	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$1,503	\$1,296	\$326	\$278	\$64
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$533	\$109	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$170	\$213	\$86	\$83	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$9,598	\$9,278	\$7,220	\$3,845	\$1,252
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$841	\$2,834	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$0	\$0	\$0	\$0	\$469
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$102	\$69	\$0	\$4	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$284	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$2,452	\$3,391	\$817	\$998	\$952
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$4,573	\$566	\$290	\$1,535	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$65	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$752	\$267	\$0	\$0	\$35
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$197	\$1,783	\$2,747	\$655	\$287
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$27	\$66	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$221	\$89	\$285	\$140	\$190
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$1,507	\$1,088	\$799	\$267	\$2,264
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$198	\$1,331	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$30	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$240	\$118	\$883	\$49	\$22
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$0	\$402	\$392	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$5,547	\$3,158	\$4,499	\$2,778	\$2,296



Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$190	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$0	\$0	\$47,182
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$37	\$0	\$245	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$178	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$7,370	\$8,812	\$2,737	\$4,833	\$1
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$4,385	\$0	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$64,332	\$18,351	\$18,580	\$17,193	\$13,301
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$20	\$34	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$0	\$59	\$2	\$0	\$10,000
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$142	\$1,540	\$1,093	\$3,818	\$620
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$13,741	\$0	\$0	\$0
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Dues	6250002	DUES-SOCIAL	\$0	\$0	\$0	\$51	\$100
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Telephone Expenses	6320000	TELE-COMMUNICATIONS	\$0	\$0	\$0	\$0	\$14
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$12,663	\$15,332	\$11,236	\$9,643	\$7,412
2200-0942	CS FIELD STAFF MANAGER	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$0	\$0	\$30
<b>2200-0942</b>	<b>CS FIELD STAFF MANAGER</b>	<b>Non-Labor</b>		<b>Non-Labor</b>	<b>TOTAL NON-LABOR</b>	<b>\$150,566</b>	<b>\$107,118</b>	<b>\$76,590</b>	<b>\$71,430</b>	<b>\$110,143</b>
<b>2200-0942</b>	<b>CS FIELD STAFF MANAGER</b>	<b>TOTAL</b>		<b>TOTAL ALL</b>		<b>\$2,037,146</b>	<b>\$1,881,159</b>	<b>\$1,615,220</b>	<b>\$1,582,341</b>	<b>\$1,571,354</b>

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

19. SCG's Customer Service Field Staff Manager Work Group forecasts \$2.406 million (\$7.218 million over three years) in TY 2016. This is an increase of \$0.835 million or 53.15% over 2013 recorded adjusted expenses of \$1.571 million. The five year average (2009-2013) is \$1.737 million. SCG's expenses declined each year between 2009 and 2013 from \$2.037 million in 2009 to \$1.571 million in 2013.

- a. SCG states on page SAF-44 that "As a result of a reorganization in early 2014, the Region CSF and Gas Distribution operations and associated supporting staffs were separated into CSF-only and Distribution-only Regions and Staffs." Provide documentation demonstrating the requested and authorized funding from SCG's 2012 GRC for its "Region CSF and Gas Distribution operations and associated supporting staffs."
- b. Provide documentation that identifies the specific functions/activities and that demonstrates the historical costs incurred (2009-2013) for all of the "Region CSF and Gas Distribution operations and associated supporting staffs."
- c. SCG states on page SAF-44 that "Prior to the reorganization, these functions reported to other existing managers and directors within the company." Provide documentation that identifies the "functions" that "reported to other existing managers and directors within the company" and provide the detailed breakdown of the associated costs. In the response explain and demonstrate specifically how SCG has reallocated and incorporated the authorized funding for "these functions" in its TY 2016 forecast.
- d. SCG utilized a five year average to forecast both its labor and non-labor forecast. Provide documentation that explains why SCG's 2013 expense level for its non-labor costs is insufficient.
- e. SCG utilized a five year average of \$1.634 million and used this figure as a starting point to calculate its incremental funding request for its TY 2016 labor forecast. SCG shows its labor forecast of \$2.275 million, an increase of 55.65% over 2013 labor expenses of \$1.461 million. Provide documentation that explains the proposed activities in more detail and which shows the calculation breakdown for \$0.173 million (the difference between \$1.634 million and \$1.461 million).
- f. Provide documentation that explains why utilizing a five year average (2009-2013) to calculate SCG's TY 2016 labor expenses is insufficient and why SCG is unable to reallocate costs embedded in its historical expenses from completed projects in order to address its proposed FTEs.
- g. Provide all supporting documentation and the basis used for the calculation of the non-labor forecast of \$0.131 million (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with a source document).

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**Question 19 (Continued)**

- h. SCG states on page SAF-46 that “Given the inherent safety risks associated with gas diversion and SoCalGas’ goal of continuously improving safety, SoCalGas is requesting \$0.483 million to add four diversion investigators and one diversion investigation supervisor.” Provide documentation that explains how long SCG’s management has known about the “inherent safety risks associated with gas diversion.” In the response state specifically why SCG is waiting until its 2016 GRC to address this inherent safety risk.
- i. SCG states on page SAF-46 that “a single diversion investigator is able to follow-up on an average of approximately 17% of potential diversion “leads” generated by field employees who observe conditions at customer premises in the field.” Provide documentation that explains specifically how long (i.e., number of years) SCG was aware that “a single diversion investigator is able to follow-up on an average of approximately 17% of potential diversion “leads,” especially considering the “inherent safety risks associated with gas diversion.”
- j. Provide documentation that demonstrates the total number of FTEs SCG employed as diversion investigators between 2009-2013 that were responsible for following up on potential diversion leads generated by field employees.
- k. Based on data provided in SCG’s Table SAF-30 on page SAF-46, SCG appears to have backlogs associated with gas diversion follow-up. Provide documentation that demonstrates the total number of deferred activities (“leads”) associated with diversion investigators following up on potential diversion leads generated by field employees.
- l. Provide documentation that explains in detail if SCG requested funding in its 2012 GRC (D.13-05-010) for activities associated with gas diversion, given the inherent safety risks associated with this activity. In the response provide the requested and authorized amount.

**SoCalGas Response:**

- 19.a-c. Prior to the reorganization in early 2014 multiple CSF supporting groups (i.e., CSF Training and Development, CSF Quality Assurance and Inspection, CSF Technology, and CSF Staff functions) reported to other directors and managers. With the reorganization these CSF supporting groups were all brought together under the newly created position of Customer Services Staff Director. This was only an organizational move; it did not impact the functions these groups performed, and the associated costs for these groups continue to be tracked under the same cost centers as prior to the reorganization. In both the 2012 GRC and the current TY 2016 filing both the historical costs and forecast costs associated with these CSF supporting groups have been allocated to CSF. There has been no comingling or double counting of costs with Gas Distribution.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**SoCalGas Response to Question 19a-c (Continued):**

For details on the CSF Support cost category please refer to Ex. SCG-10, page SAF-27. For details on the Customer Services Staff Director please refer to Ex. SCG-10, page SAF-44. For details on requested and authorized funding from the 2012 GRC please refer to the attachment “ORA-SCG-DR-052-TLG-Q4 Attachment.xlsx”.

19.d-g. A five-year average (2009 – 2013) was used to forecast both labor and non-labor costs to avoid the potential for artificially inflating or deflating results based on short-term anomalies. Using the five-year average methodology results in a forecast of \$1.634 million in labor and \$0.103 million in non-labor for the Customer Services Field Staff workgroup. In addition, there are two incremental requests for which associated expenses are not embedded in the historical costs (2009 – 2013) and not reflected in the five-year average results of \$1.634 million in labor and \$0.103 in non-labor. The first incremental request is a newly created position of Customer Services Staff Director (\$0.176 million for labor, \$0.010 million for non-labor); the second incremental request is the Diversion Investigation Program (\$0.465 million for labor, \$0.018 million for non-labor). These two items represent a total incremental cost of \$0.641 million in labor, and \$0.028 million in non-labor. Combining the \$1.634 million (from five-year average of 2009 – 2013) in labor with the incremental request of \$0.641 million results in the total forecast of \$2.275 million in labor. Combining the \$0.103 million (from five-year average of 2009 – 2013) in non-labor with the incremental request of \$0.028 million results in the total forecast of \$0.131 million in non-labor. Using 2013 adjusted recorded non-labor as a forecast for TY 2016 would leave SoCalGas with insufficient funds to support the aforementioned incremental requests.

The five-year average cost for the CSF Staff work group covers recurring work such as maintaining/updating CSF policies and procedures, maintaining/updating CSF data bases and systems and other related, recurring work required to support CSF operations. Capital costs associated with project work would not be reflected in the five-year average recorded adjusted cost. There is no excess capacity to be able to absorb the additional diversion investigation work being proposed, and the new, incremental director position was filled in 2014, from outside the work group. In other words, using the five-year average of \$1.634 million as the labor forecast for TY 2016 would not be sufficient.

For details on the calculation of the forecast for 2016 CSF Staff cost category please refer to Ex. SCG-10, page SAF-47, and Table SAF-31. For details on the Customer Services Staff Director please refer to Ex. SCG-10, page SAF-44, and Ex. SCG-10-WP, page 170. For details on the Diversion Investigation Program please refer to Ex. SCG-10, page SAF-45, and Ex. SCG-10-WP, page 170, and the summary table below.

**ORA DATA REQUEST  
 ORA-SCG-DR-052-TLG  
 SOCALGAS 2016 GRC – A.14-11-004  
 SOCALGAS PARTIAL RESPONSE  
 DATE RECEIVED: FEBRUARY 3, 2015  
 DATE RESPONDED: FEBRUARY 23, 2015**

**SoCalGas Response to Question 19d-g (Continued):**

Diversion Investigation Program			
	Labor	Non-Labor	Total
1 – Supervisor	1 x \$97,000 = \$97,000	1 x \$3,600 = \$3,600	\$100,600
4 – Investigator	4 x \$92,000 = \$368,000	4 x \$3,600 = \$14,400	\$382,400
Total	\$465,000	\$18,000	\$483,000

19.h. SoCalGas has been aware of the inherent safety risks associated with gas diversion and has not waited until the 2016 GRC in order to address this issue. SoCalGas has always had and will continue to have safeguards in place to mitigate risks associated with gas diversion. However, we continuously look for ways to improve current efforts.

Existing and proposed diversion safeguards are summarized below.

- SoCalGas Meter Reading, in conjunction with obtaining meter reads for billing purposes, performs visual inspections for signs of diversion. Because they visit meters to collect meter reads every month, these employees serve as a key source of diversion leads.
- All CSF technicians receive training to perform visual inspections for signs of diversion when working at the meter.
- Two field technicians at every operating district receive enhanced training to be able to assist with potential instances of diversion.
- Beginning in 2010, to increase meter security and deter diversion, locking devices were installed on all meter bypass valves found not locked.
- Beginning in 2011, a new lock was introduced, the McGard plug lock, to deter diversion by making it more difficult to remove the lock and tamper with the shutoff valve.
- While the specially trained CSF technicians in each district are able to address immediate safety issues, which may include shutting off gas service to the customer's premise, they do not have the bandwidth or expertise to fully investigate diversion incidents (e.g., for back billing purposes), develop prevention strategies or to conduct proactive meter spot checks throughout SoCalGas' service territory once meter readers are no longer visiting meters every month.

19.i. This metric was identified as SoCalGas was preparing for the TY 2016 GRC and is not a metric that was previously tracked.

19.j. For the period 2009 – 2013 SoCalGas has employed one diversion investigator.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**SoCalGas Response to Question 19 (Continued):**

- 19.k. Table SAF-30 on page SAF-46 of Ex. SCG-10 shows the number of diversion leads that the diversion investigator has been able to personally follow up on each year. This does not mean that SoCalGas deferred activities associated with following up on potential diversions. Field supervisors and field technicians are used to address the leads that the investigator is not able to follow up on. Potential diversions are addressed and corrected under the direction of field supervisors, with assistance from the diversion investigator when possible. However, this approach does not offer the greatest deterrent to recidivism. Diversions are instances of customers actively attempting to conceal their unauthorized alteration of SoCalGas facilities. Field technicians and field supervisors cannot perform research and analysis on billing history, or gather the necessary evidence to bill customers for the gas stolen, nor are they in a position to develop prevention strategies or spot check meters in the field.
- 19.l. SoCalGas did not request any incremental funding in its 2012 GRC for activities associated with gas diversion.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

21. SCG's Customer Services Field Operations Group forecasts \$127.945 million (\$383.835 million over three years) in TY 2016. This is an increase of \$22.037 million or 20.81% over 2013 expenses of \$105.908 million. The five year average (2009-2013) for Customer Service Field Operations is \$107.328 million. SCG's expenses fluctuated slightly between 2009 and 2013 with 2010 recording the highest expense level for the five year period of \$110.778 million.
- a. Provide all supporting documentation and the basis used for the calculation of the incremental labor and non-labor forecast of \$22.037 million shown in Table SAF-5 on page SAF-6 and Table SAF-16 on page SAF-23 (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with a source document).
  - b. If SCG utilized a Market Reference Range to forecast labor costs for proposed FTEs, provide the source document for the Market Reference Range and any other documentation SCG utilized to forecast labor for FTEs.
  - c. On pages SAF-7 through SAF-10, SCG's Table SAF-6 show the forecasting methodology utilized by SCG to forecast its TY 2016 work order volumes and Table SAF-7 on pages SAF-10 and SAF-11 show the historical and forecast order volumes based on the forecast methodology from Table SAF-6. Provide documentation that explains why SCG utilized five year/four year average methodologies (i.e., instead of utilizing 2013 order volumes) to forecast TY 2016 order volumes when its historical order volumes show declining order volume trends each year between 2009-2013. Provide the response in a table similar to Tables SAF-6 and SAF-7.
  - d. For SCG's Tables SAF-6 and SAF-7 on pages SAF-7 through SAF-11 which shows its forecasting methodology utilized to forecast its TY 2016 work order volumes and shows SCG's historical and forecasted order volumes, provide historical and forecasts cost data for order volumes in the same format as Tables SAF-6 and SAF-7 for 2009-2013.
  - e. For SCG's Table SAF-8 (Average Drive Time per CSF Order (Minutes) on page SAF-12 and Table SAF-9 (Total Average On-Premise Time per Order (Minutes) on page SAF-13, provide the 2009-2014 recorded costs in the same manner as shown in the tables along with verifiable support documentation.
  - f. SCG states on page SAF-13 that it "recently conducted an Engineering Labor Standards ("ELS") study to determine how long it should take to complete each subjected order type." Provide the time period of the ELS study and the associated costs incurred. In the response also state if the ELS study covered each order type shown in Table SAF-7 on page SAF-10 and SAF-11.
  - g. Provide documentation that explains why there is a difference between SCG's Actual 2013 versus ELS Average On Premise Times (Minutes) as shown in Table SAF-10 on page SAF-14.
  - h. Provide the costs associated with SCG's Actual 2013 versus ELS Average On Premise Times (Minutes) as shown in Table SAF-10 on page SAF-14.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS PARTIAL RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 23, 2015**

**SoCalGas Response to Question 21c (Continued):**

Meter Work (O&M) – Meter Change – Not Entered	143,908	147,658	124,886	104,677	66,443 <sup>8</sup>	162,245	162,298	162,352
Meter Work (O&M) – Meter Change (Size)	5,066	5,179	5,029	5,096	5,498	5,441	5,383	5,326
Meter Work (O&M) – Meter Remove	5,325	4,688	5,059	5,193	5,356	5,329	5,302	5,276
Non Pay Turn On – Turn On	110,172	106,589	84,833	80,872	81,011	85,855	90,700	95,544
Read/Verify – Verify	84,105	88,098	81,186	79,694	78,893	80,882	82,872	84,861
Read/Verify – Verify – Soft Close	75,890	68,859	51,157	48,766	43,690	48,954	54,218	59,482
Read/Verify – Verify – Soft Close – 180 Days	40,907	38,611	29,418	27,028	24,522	27,382	30,241	33,101
Read/Verify – Load Survey – Residential	6,409	6,282	5,910	5,912	5,834	5,973	6,112	6,251
Turn On/Shutoff – Turn On (Entered)	180,320	171,262	145,088	131,103	118,167	127,207	136,247	145,287
Turn On/Shutoff – Turn On Entered (Gas On)	65,818	61,031	59,260	51,382	45,495	48,921	52,348	55,774
Turn On/Shutoff – Turn On (Back On/Restore)	63,236	58,926	55,714	51,053	54,423	53,496	55,939	58,382
Turn On/Shutoff – Turn On (PSI)	1,713	1,834	1,541	1,571	1,522	1,568	1,614	1,661
Turn On/Shutoff – Close (Hard)	52,268	51,596	48,658	47,330	46,669	47,735	48,801	49,867
Miscellaneous – Service Order (MSO)	29,144	21,821	23,796	23,753	28,469	27,696	26,923	26,151
Miscellaneous – Meter Reg (MMR)	66,124	45,183	38,049	51,665	30,916	36,557	42,199	47,840
Miscellaneous – Assist	15,325	13,265	13,456	13,914	15,165	14,992	14,820	14,647
Food Industry – Turn On (Entered)	2,778	2,934	2,996	3,132	3,103	3,094	3,085	3,076
Food Industry – CSO	54,773	52,755	51,342	53,753	55,366	55,306	55,246	55,186
Food Industry – CSO Leak	10,182	10,068	9,870	10,257	9,950	10,088	10,226	10,364
Commercial/Industrial - ISO	15,958	18,479	19,298	21,183	21,671	21,072	20,473	19,874
Commercial/Industrial – Load Survey – I/C	3,238	1,601	4,110	4,071	4,099	3,906	3,713	3,521
Commercial/Industrial - CSO	24,070	26,156	25,627	23,685	31,827	30,231	28,634	27,038
Commercial/Industrial – Turn On (Entered)	21,634	25,309	24,813	22,535	31,780	29,834	27,888	25,942
Customer/Company Work - Other	3	12	1	1	4	4	4	4
Incomplete	323,982	324,664	322,462	291,366	265,557	267,196	268,835	270,473
<b>Total</b>	<b>4,318,794</b>	<b>4,214,517</b>	<b>3,926,239</b>	<b>3,787,419</b>	<b>3,665,791</b>	<b>3,866,775</b>	<b>3,955,346</b>	<b>4,043,617</b>

- 21.d. SoCalGas is not able to provide historical cost data for order volumes in the same format as Tables SAF-6 and SAF-7 for 2009 – 2013 because expenses are not tracked at the level of granularity required to conduct such an analysis.

Forecasted cost data for order volumes in the same format as Table SAF-6 and SAF-7 for 2014 – 2016 is provided in Ex. SCG-10-WP, page 18 through 24. It is also attached to this response as “ORA-SCG-DR-052-TLG-Q10 Attachment 1.xlsx” for your convenience.

- 21.e. SoCalGas is not able to provide historical (2009 – 2013) recorded costs associated with average drive time per order, and average on premise time per order because expenses are not tracked at the level of granularity required to conduct such an analysis.

<sup>8</sup> This number excludes a total of 241,041 meter changes that were completed as part of AMI implementation. As mentioned previously, beginning in 2013, CSF focused on curb meter changes while the AMI project team focused on above-ground meter changes.



ORA-SCG-DR-052-TLG QUESTION 21 ATTACHMENT

<b>Attachment to ORA-SCG-DR-052-TLG, Question 21</b>			
<b>Exhibit Reference: SCG-10 Customer Services Field and Meter Reading</b>			
<b>Expenses shown in 2013\$, Forecasted Order Count and funding required to complete the orders</b>			
Order Types	Forecasted Order Counts		
	( A )		
	2014	2015	2016
Change of Account - Turn On (Not Entered)	827,797	839,483	851,170
Change of Account - Close (Soft)	635,258	655,814	676,369
Credit/Collections - 48 Hour (1st Call)	40,755	41,212	41,668
Credit/Collections - Collect/Close (2nd Call)	277,964	290,208	302,453
Credit/Collections - Returned Check	4,580	4,908	5,235
Credit/Collections - Tenant Notification	14,295	13,867	13,440
Credit/Collections - Other	71	81	92
Customer Service Order ("CSO")	250,016	251,550	253,083
CSO - Carbon Monoxide Test	7,266	8,344	9,582
CSO - No Gas	15,571	16,131	16,691
CSO - Seasonal Off	7,306	7,351	7,395
CSO - Seasonal On	64,987	65,385	65,784
Gas Leak - CSO Leak	270,325	272,175	274,026
Gas Leak - Pilot Out Only	23,337	23,480	23,623
Gas Leak - Leak Investigation (Step2)	12,831	13,120	13,408
Fumigation - Turn On	68,572	69,008	69,529
Fumigation - Close	78,455	78,953	79,549
HBI - Entered	7,384	7,252	7,121
HBI - Not Entered	12,082	10,929	9,776
Meter Work (Capital) - Meter Set - Turn On	25,556	29,380	32,697
Meter Work (Capital) - Meter Set - Left Off	2,877	3,307	3,681
Meter Work (Capital) - Meter Set (PSI)	3,989	4,586	5,104
Meter Work (O&M) - Meter Reset - Turn On	1,638	1,780	1,923
Meter Work (O&M) - Meter Reset - Left Off	582	599	615
Meter Work (O&M) - Meter Change (Entered)	12,314	12,318	12,322
Meter Work (O&M) - Meter Change (Not Entered)	162,245	162,298	162,352
Meter Work (O&M) - Meter Change (Size)	5,441	5,383	5,326
Meter Work (O&M) - Meter Remove	5,329	5,302	5,276
NonPay Turn On - Turn On	85,855	90,700	95,544
Read/Verify - Verify	80,882	82,872	84,861
Read/Verify - Verify - Soft Close	48,954	54,218	59,482
Read/Verify - Verify - Soft Close - 180 Days	27,382	30,241	33,101
Read/Verify - Load Survey - Residential	5,973	6,112	6,251
TurnOn/ShutOff - Turn On (Entered)	127,207	136,247	145,287
TurnOn/ShutOff - Turn On Entered (Gas On)	48,921	52,348	55,774
TurnOn/ShutOff - Turn On (Back On/Restore)	53,496	55,939	58,382
TurnOn/ShutOff - Turn On (PSI)	1,568	1,614	1,661
TurnOn/ShutOff - Close (Hard)	47,735	48,801	49,867
Miscellaneous - Service Order (MSO)	27,696	26,923	26,151
Miscellaneous - Meter & Reg (MMR)	36,557	42,199	47,840
Miscellaneous - Assist	14,992	14,820	14,647
Food Industry - Turn On (Entered)	3,094	3,085	3,076
Food Industry - CSO	55,306	55,246	55,186
Food Industry - CSO Leak	10,088	10,226	10,364
Commercial/Industrial - ISO	21,072	20,473	19,874
Commercial/Industrial - Load Survey- I/C	3,906	3,713	3,521
Commercial/Industrial - CSO	30,231	28,634	27,038
Commercial/Industrial - Turn On (Entered)	29,834	27,888	25,942
Cust/Comp Work - Other	4	4	4
Incomplete	267,196	268,835	270,473
Proposed Service Enhancements - Expanded Appliance Safety Checks			87,814
Proposed Service Enhancements - Customer Outreach Safety Checks			50,000
Proposed Service Enhancements - Enhanced Customer Education			918,041
<b>TOTAL</b>	<b>3,866,775</b>	<b>3,955,346</b>	<b>5,099,472</b>

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

<u>Forecasted On-Prem Time (Minutes)</u>				<u>Forecasted Average Drive Time Per Order (Minutes)</u>			
<u>( B )</u>	<u>( C ) = ( A * B )</u>			<u>( D ) = ( 1% Increase From Previous Year )</u>			
<u>On-Prem Time Per Order (Minutes)</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2013 Average Drive Time Per Order (Minutes)</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>
6.9	5,673,832	5,753,934	5,834,036	11.5	11.6	11.7	11.8
4.6	2,944,346	3,039,618	3,134,890	11.5	11.6	11.7	11.8
5.2	212,323	214,703	217,083	11.5	11.6	11.7	11.8
8.9	2,469,060	2,577,826	2,686,592	11.5	11.6	11.7	11.8
10.0	45,801	49,075	52,348	11.5	11.6	11.7	11.8
7.3	104,084	100,973	97,861	11.5	11.6	11.7	11.8
13.0	929	1,062	1,196	11.5	11.6	11.7	11.8
20.4	5,091,936	5,123,167	5,154,398	11.5	11.6	11.7	11.8
37.6	273,052	313,548	360,049	11.5	11.6	11.7	11.8
28.0	435,396	451,055	466,714	11.5	11.6	11.7	11.8
15.7	114,846	115,550	116,255	11.5	11.6	11.7	11.8
21.9	1,421,996	1,430,717	1,439,439	11.5	11.6	11.7	11.8
30.4	8,228,155	8,284,472	8,340,788	11.5	11.6	11.7	11.8
22.7	530,767	534,022	537,278	11.5	11.6	11.7	11.8
57.3	735,468	751,997	768,525	11.5	11.6	11.7	11.8
39.7	2,721,234	2,738,529	2,759,198	11.5	11.6	11.7	11.8
21.3	1,671,602	1,682,226	1,694,923	11.5	11.6	11.7	11.8
46.7	344,958	338,816	332,673	11.5	11.6	11.7	11.8
18.9	228,689	206,861	185,034	11.5	11.6	11.7	11.8
72.0	1,839,823	2,115,098	2,353,942	11.5	11.6	11.7	11.8
67.8	195,185	224,388	249,727	11.5	11.6	11.7	11.8
45.3	180,728	207,768	231,230	11.5	11.6	11.7	11.8
89.4	146,363	159,107	171,851	11.5	11.6	11.7	11.8
85.0	49,482	50,864	52,245	11.5	11.6	11.7	11.8
66.1	813,370	813,636	813,903	11.5	11.6	11.7	11.8
26.6	4,317,634	4,319,050	4,320,467	11.5	11.6	11.7	11.8
75.1	408,463	404,165	399,866	11.5	11.6	11.7	11.8
18.0	95,660	95,180	94,699	11.5	11.6	11.7	11.8
32.8	2,813,317	2,972,057	3,130,796	11.5	11.6	11.7	11.8
9.4	761,384	780,111	798,838	11.5	11.6	11.7	11.8
7.7	378,465	419,162	459,859	11.5	11.6	11.7	11.8
7.5	205,955	227,464	248,974	11.5	11.6	11.7	11.8
45.1	269,160	275,427	281,695	11.5	11.6	11.7	11.8
36.3	4,618,800	4,947,038	5,275,277	11.5	11.6	11.7	11.8
28.4	1,389,607	1,486,930	1,584,252	11.5	11.6	11.7	11.8
39.0	2,084,705	2,179,905	2,275,106	11.5	11.6	11.7	11.8
48.6	76,262	78,510	80,758	11.5	11.6	11.7	11.8
4.6	221,246	226,186	231,127	11.5	11.6	11.7	11.8
31.2	864,426	840,308	816,189	11.5	11.6	11.7	11.8
39.0	1,426,895	1,647,089	1,867,283	11.5	11.6	11.7	11.8
60.0	898,933	888,581	878,230	11.5	11.6	11.7	11.8
85.3	263,933	263,173	262,413	11.5	11.6	11.7	11.8
62.3	3,445,295	3,441,561	3,437,827	11.5	11.6	11.7	11.8
48.4	488,232	494,917	501,602	11.5	11.6	11.7	11.8
82.9	1,747,693	1,698,026	1,648,358	11.5	11.6	11.7	11.8
67.3	262,715	249,748	236,782	11.5	11.6	11.7	11.8
28.7	868,850	822,967	777,084	11.5	11.6	11.7	11.8
44.4	1,323,983	1,237,625	1,151,266	11.5	11.6	11.7	11.8
-	-	-	-	11.5	11.6	11.7	11.8
10.3	2,745,026	2,761,862	2,778,699	11.5	11.6	11.7	11.8
15.3	-	-	1,347,665	-	-	-	-
38.7	-	-	1,937,472	11.5	11.6	11.7	11.8
1.5	-	-	1,377,061	-	-	-	-

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

<b>Forecasted Drive Time (Minutes)</b>			<b>On-Prem &amp; Drive Time (Hours)</b>		
<b>(E) = (A * D)</b>			<b>(F) = (C + E) / 60</b>		
<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
9,594,810	9,827,570	10,064,026	254,477	259,692	264,968
7,363,141	7,677,408	7,997,225	171,791	178,617	185,535
472,380	482,451	492,676	11,412	11,619	11,829
3,221,817	3,397,380	3,576,132	94,848	99,587	104,379
53,090	57,453	61,898	1,648	1,775	1,904
165,687	162,341	158,912	4,496	4,389	4,280
826	954	1,085	29	34	38
2,897,886	2,944,817	2,992,396	133,164	134,466	135,780
84,224	97,682	113,291	5,955	6,854	7,889
180,480	188,840	197,350	10,265	10,665	11,068
84,680	86,051	87,442	3,325	3,360	3,395
753,245	765,444	777,811	36,254	36,603	36,954
3,133,280	3,186,272	3,240,011	189,357	191,179	193,013
270,496	274,876	279,317	13,354	13,482	13,610
148,726	153,589	158,534	14,737	15,093	15,451
794,808	807,858	822,095	58,601	59,106	59,688
909,353	924,284	940,572	43,016	43,442	43,925
85,581	84,898	84,192	7,176	7,062	6,948
140,038	127,939	115,584	6,145	5,580	5,010
296,215	343,940	386,607	35,601	40,984	45,676
33,347	38,719	43,523	3,809	4,385	4,887
46,235	53,684	60,344	3,783	4,358	4,860
18,981	20,840	22,734	2,756	2,999	3,243
6,749	7,007	7,269	937	965	992
142,730	144,204	145,694	15,935	15,964	15,993
1,880,548	1,899,977	1,919,606	103,303	103,650	104,001
63,062	63,023	62,976	7,859	7,786	7,714
61,770	62,074	62,378	2,624	2,621	2,618
995,130	1,061,792	1,129,688	63,474	67,231	71,008
937,490	970,154	1,003,378	28,315	29,171	30,037
567,416	634,716	703,305	15,765	17,565	19,386
317,375	354,027	391,379	8,722	9,692	10,673
69,233	71,553	73,913	5,640	5,783	5,927
1,474,429	1,595,003	1,717,840	101,554	109,034	116,552
567,035	612,816	659,455	32,611	34,996	37,395
620,060	654,859	690,292	45,079	47,246	49,423
18,177	18,900	19,635	1,574	1,623	1,673
553,285	571,296	589,613	12,909	13,291	13,679
321,021	315,185	309,199	19,757	19,258	18,756
423,729	494,009	565,652	30,844	35,685	40,549
173,773	173,490	173,183	17,878	17,701	17,524
35,863	36,117	36,373	4,997	4,988	4,980
641,040	646,749	652,508	68,106	68,138	68,172
116,929	119,716	122,546	10,086	10,244	10,402
244,243	239,675	234,991	33,199	32,295	31,389
45,276	43,472	41,627	5,133	4,887	4,640
350,396	335,211	319,687	20,321	19,303	18,280
345,800	326,477	306,733	27,830	26,068	24,300
48	49	51	1	1	1
3,097,008	3,147,164	3,198,012	97,367	98,484	99,612
-	-	-	-	-	22,461
-	-	591,188	-	-	42,144
-	-	-	-	-	22,951

<b>Non Job time Loader (Hours)</b>				<b>Adjustment to Remove Meter Work Capital On-Prem Time (Hours) <sup>1</sup></b>		
<b>( G )</b>	<b>( H ) = ( F * ( 1 + G ) )</b>			<b>( I ) = ( H - Meter Work Capital On-Prem Time)</b>		
<b>Non Job Time (NJT) Loader</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
21.09%	308,147	314,461	320,850	308,147	314,461	320,850
21.09%	208,023	216,288	224,665	208,023	216,288	224,665
21.09%	13,818	14,070	14,324	13,818	14,070	14,324
21.09%	114,852	120,590	126,392	114,852	120,590	126,392
21.09%	1,996	2,150	2,306	1,996	2,150	2,306
21.09%	5,444	5,314	5,182	5,444	5,314	5,182
21.09%	35	41	46	35	41	46
21.09%	161,248	162,826	164,416	161,248	162,826	164,416
21.09%	7,210	8,299	9,553	7,210	8,299	9,553
21.09%	12,429	12,914	13,402	12,429	12,914	13,402
21.09%	4,027	4,069	4,111	4,027	4,069	4,111
21.09%	43,900	44,322	44,748	43,900	44,322	44,748
21.09%	229,293	231,499	233,720	229,293	231,499	233,720
21.09%	16,171	16,325	16,480	16,171	16,325	16,480
21.09%	17,845	18,276	18,710	17,845	18,276	18,710
21.09%	70,960	71,572	72,277	70,960	71,572	72,277
21.09%	52,088	52,604	53,189	52,088	52,604	53,189
21.09%	8,689	8,551	8,413	8,689	8,551	8,413
21.09%	7,442	6,757	6,067	7,442	6,757	6,067
21.09%	43,109	49,628	55,309	12,445	14,376	16,077
21.09%	4,612	5,310	5,918	1,359	1,570	1,756
21.09%	4,580	5,277	5,884	1,568	1,814	2,031
21.09%	3,337	3,632	3,927	3,337	3,632	3,927
21.09%	1,135	1,168	1,201	1,135	1,168	1,201
21.09%	19,296	19,331	19,366	19,296	19,331	19,366
21.09%	125,090	125,511	125,935	125,090	125,511	125,935
21.09%	9,516	9,429	9,341	9,516	9,429	9,341
21.09%	3,177	3,174	3,170	3,177	3,174	3,170
21.09%	76,861	81,410	85,984	76,861	81,410	85,984
21.09%	34,286	35,323	36,372	34,286	35,323	36,372
21.09%	19,090	21,269	23,475	19,090	21,269	23,475
21.09%	10,562	11,735	12,923	10,562	11,735	12,923
21.09%	6,829	7,003	7,177	6,829	7,003	7,177
21.09%	122,972	132,029	141,133	122,972	132,029	141,133
21.09%	39,488	42,376	45,282	39,488	42,376	45,282
21.09%	54,587	57,210	59,847	54,587	57,210	59,847
21.09%	1,906	1,966	2,026	1,906	1,966	2,026
21.09%	15,631	16,095	16,564	15,631	16,095	16,564
21.09%	23,924	23,320	22,712	23,924	23,320	22,712
21.09%	37,349	43,211	49,101	37,349	43,211	49,101
21.09%	21,649	21,434	21,219	21,649	21,434	21,219
21.09%	6,050	6,040	6,030	6,050	6,040	6,030
21.09%	82,469	82,509	82,550	82,469	82,509	82,550
21.09%	12,213	12,404	12,596	12,213	12,404	12,596
21.09%	40,201	39,106	38,009	40,201	39,106	38,009
21.09%	6,216	5,918	5,619	6,216	5,918	5,619
21.09%	24,606	23,374	22,135	24,606	23,374	22,135
21.09%	33,699	31,566	29,425	33,699	31,566	29,425
21.09%	1	1	1	1	1	1
21.09%	117,902	119,254	120,620	117,902	119,254	120,620
21.09%	-	-	27,198	-	-	27,198
21.09%	-	-	51,033	-	-	51,033
21.09%	-	-	27,791	-	-	27,791

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

<u>Vacation &amp; Sick Loader ( Hours )</u>				<u>Total Forecasted Workload With Vacation &amp; Sick ( Dollars )</u>			
( J )	( K ) = ( I * ( 1 + J ) )			( L )	( M ) = ( K * L )		
V&S Rate for (\$)	2014	2015	2016	2013 Blended Wage Rate	2014	2015	2016
16.62%	359,361	366,725	374,175	\$ 37.77	\$ 13,573,855	\$ 13,851,990	\$ 14,133,410
16.62%	242,596	252,235	262,004	\$ 37.77	\$ 9,163,378	\$ 9,527,459	\$ 9,896,473
16.62%	16,115	16,408	16,705	\$ 37.77	\$ 608,702	\$ 619,771	\$ 630,977
16.62%	133,940	140,632	147,399	\$ 37.77	\$ 5,059,202	\$ 5,311,971	\$ 5,567,575
16.62%	2,327	2,507	2,689	\$ 37.77	\$ 87,914	\$ 94,703	\$ 101,565
16.62%	6,349	6,197	6,043	\$ 37.77	\$ 239,827	\$ 234,087	\$ 228,272
16.62%	41	47	54	\$ 37.77	\$ 1,560	\$ 1,792	\$ 2,027
16.62%	188,048	189,887	191,742	\$ 37.77	\$ 7,102,968	\$ 7,172,454	\$ 7,242,517
16.62%	8,409	9,679	11,140	\$ 37.77	\$ 317,619	\$ 365,584	\$ 420,800
16.62%	14,495	15,061	15,629	\$ 37.77	\$ 547,515	\$ 568,868	\$ 590,354
16.62%	4,696	4,745	4,794	\$ 37.77	\$ 177,379	\$ 179,224	\$ 181,086
16.62%	51,196	51,689	52,185	\$ 37.77	\$ 1,933,794	\$ 1,952,392	\$ 1,971,140
16.62%	267,402	269,974	272,564	\$ 37.77	\$ 10,100,340	\$ 10,197,515	\$ 10,295,355
16.62%	18,858	19,038	19,219	\$ 37.77	\$ 712,324	\$ 719,112	\$ 725,955
16.62%	20,810	21,314	21,819	\$ 37.77	\$ 786,050	\$ 805,067	\$ 824,158
16.62%	82,753	83,467	84,289	\$ 37.77	\$ 3,125,769	\$ 3,152,745	\$ 3,183,777
16.62%	60,745	61,347	62,029	\$ 37.77	\$ 2,294,474	\$ 2,317,192	\$ 2,342,961
16.62%	10,133	9,972	9,811	\$ 37.77	\$ 382,750	\$ 376,682	\$ 370,594
16.62%	8,678	7,880	7,075	\$ 37.77	\$ 327,799	\$ 297,638	\$ 267,250
16.62%	14,514	16,765	18,748	\$ 37.77	\$ 548,208	\$ 633,258	\$ 708,171
16.62%	1,585	1,831	2,048	\$ 37.77	\$ 59,867	\$ 69,165	\$ 77,359
16.62%	1,829	2,115	2,368	\$ 37.77	\$ 69,086	\$ 79,895	\$ 89,448
16.62%	3,892	4,235	4,580	\$ 37.77	\$ 146,991	\$ 159,973	\$ 172,987
16.62%	1,323	1,362	1,401	\$ 37.77	\$ 49,989	\$ 51,447	\$ 52,908
16.62%	22,503	22,544	22,585	\$ 37.77	\$ 849,974	\$ 851,522	\$ 853,084
16.62%	145,880	146,370	146,866	\$ 37.77	\$ 5,510,197	\$ 5,528,728	\$ 5,547,438
16.62%	11,098	10,996	10,893	\$ 37.77	\$ 419,187	\$ 415,331	\$ 411,468
16.62%	3,705	3,701	3,697	\$ 37.77	\$ 139,956	\$ 139,799	\$ 139,642
16.62%	89,635	94,940	100,274	\$ 37.77	\$ 3,385,718	\$ 3,586,100	\$ 3,787,579
16.62%	39,985	41,194	42,417	\$ 37.77	\$ 1,510,303	\$ 1,555,989	\$ 1,602,174
16.62%	22,262	24,804	27,376	\$ 37.77	\$ 840,891	\$ 936,900	\$ 1,034,055
16.62%	12,317	13,686	15,071	\$ 37.77	\$ 465,242	\$ 516,947	\$ 569,276
16.62%	7,964	8,166	8,370	\$ 37.77	\$ 300,832	\$ 308,466	\$ 316,136
16.62%	143,410	153,973	164,589	\$ 37.77	\$ 5,416,893	\$ 5,815,888	\$ 6,216,895
16.62%	46,051	49,419	52,808	\$ 37.77	\$ 1,739,459	\$ 1,866,678	\$ 1,994,661
16.62%	63,659	66,719	69,793	\$ 37.77	\$ 2,404,542	\$ 2,520,112	\$ 2,636,245
16.62%	2,223	2,293	2,363	\$ 37.77	\$ 83,957	\$ 86,598	\$ 89,250
16.62%	18,229	18,769	19,317	\$ 37.77	\$ 688,559	\$ 708,964	\$ 729,639
16.62%	27,901	27,196	26,487	\$ 37.77	\$ 1,053,865	\$ 1,027,235	\$ 1,000,472
16.62%	43,556	50,393	57,261	\$ 37.77	\$ 1,645,209	\$ 1,903,441	\$ 2,162,885
16.62%	25,247	24,997	24,746	\$ 37.77	\$ 953,638	\$ 944,183	\$ 934,708
16.62%	7,056	7,044	7,032	\$ 37.77	\$ 266,519	\$ 266,070	\$ 265,622
16.62%	96,176	96,222	96,270	\$ 37.77	\$ 3,632,760	\$ 3,634,516	\$ 3,636,316
16.62%	14,243	14,466	14,690	\$ 37.77	\$ 537,990	\$ 546,410	\$ 554,869
16.62%	46,882	45,606	44,326	\$ 37.77	\$ 1,770,835	\$ 1,722,620	\$ 1,674,301
16.62%	7,249	6,901	6,553	\$ 37.77	\$ 273,804	\$ 260,673	\$ 247,506
16.62%	28,696	27,259	25,813	\$ 37.77	\$ 1,083,912	\$ 1,029,622	\$ 975,031
16.62%	39,300	36,813	34,315	\$ 37.77	\$ 1,484,440	\$ 1,390,490	\$ 1,296,165
16.62%	1	1	1	\$ 37.77	\$ 42	\$ 44	\$ 46
16.62%	137,498	139,074	140,667	\$ 37.77	\$ 5,193,580	\$ 5,253,136	\$ 5,313,309
16.62%	-	-	31,719	\$ 37.77	\$ -	\$ -	\$ 1,198,077
16.62%	-	-	59,514	\$ 37.77	\$ -	\$ -	\$ 2,247,984
16.62%	-	-	32,410	\$ 37.77	\$ -	\$ -	\$ 1,224,210
				<b>TOTAL</b>	<b>\$ 99,069,666</b>	<b>\$ 101,556,451</b>	<b>\$ 108,736,164</b>

<b>Total Forecasted Workload With Vacation &amp; Sick ( FTE )</b>			
<b>( N )</b>	<b>( O ) = ( I * ( 1 + N ) ) / 2088</b>		
<b>V&amp;S Rate for (FTE)</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
16.90%	173	176	180
16.90%	116	121	126
16.90%	8	8	8
16.90%	64	68	71
16.90%	1	1	1
16.90%	3	3	3
16.90%	0	0	0
16.90%	90	91	92
16.90%	4	5	5
16.90%	7	7	8
16.90%	2	2	2
16.90%	25	25	25
16.90%	128	130	131
16.90%	9	9	9
16.90%	10	10	10
16.90%	40	40	40
16.90%	29	29	30
16.90%	5	5	5
16.90%	4	4	3
16.90%	7	8	9
16.90%	1	1	1
16.90%	1	1	1
16.90%	2	2	2
16.90%	1	1	1
16.90%	11	11	11
16.90%	70	70	71
16.90%	5	5	5
16.90%	2	2	2
16.90%	43	46	48
16.90%	19	20	20
16.90%	11	12	13
16.90%	6	7	7
16.90%	4	4	4
16.90%	69	74	79
16.90%	22	24	25
16.90%	31	32	34
16.90%	1	1	1
16.90%	9	9	9
16.90%	13	13	13
16.90%	21	24	27
16.90%	12	12	12
16.90%	3	3	3
16.90%	46	46	46
16.90%	7	7	7
16.90%	23	22	21
16.90%	3	3	3
16.90%	14	13	12
16.90%	19	18	16
16.90%	0	0	0
16.90%	66	67	68
16.90%	-	-	15
16.90%	-	-	29
16.90%	-	-	16
<b>TOTAL</b>	<b>1,259</b>	<b>1,291</b>	<b>1,382</b>

<b>SUMMARY OF OPERATIONS FORECAST</b>		<b>2014</b>	<b>2015</b>	<b>2016</b>
( a )	Paid Hours	2,088	2,088	2,088
( b )	5 Yr Avg Training To Workload Ratio (%) <sup>2</sup>	5.92%	5.92%	5.92%
( c )	Hourly Training Rate (\$) <sup>2</sup>	\$ 34.54	\$ 34.54	\$ 34.54
( d )	Non-Labor Per FTE (\$) <sup>3</sup>	\$ 4,592	\$ 4,592	\$ 4,592
( e )	Total Workload Labor (FTE) <sup>4</sup>	1,259	1,291	1,382
( f ) = ( b * e )	Total Training Labor (FTE)	75	76	82
( g ) = ( e + f )	Total Labor (FTE)	1,334	1,367	1,464
( h )	Total Workload Labor (\$) <sup>5</sup>	\$ 99,069,666	\$ 101,556,451	\$ 108,736,164
( i ) = ( a * c * f )	Total Training Labor (\$)	\$ 5,377,299	\$ 5,512,276	\$ 5,901,976
( j ) = ( h + i )	<b>Total Operations Labor (\$)</b>	<b>\$ 104,446,964</b>	<b>\$ 107,068,728</b>	<b>\$ 114,638,140</b>
( k ) = ( d * g )	<b>Total Operations Non-Labor (\$)</b>	<b>\$ 6,125,065</b>	<b>\$ 6,278,813</b>	<b>\$ 6,722,705</b>
<b>SUMMARY OF SUPERVISORS FORECAST</b>		<b>2014</b>	<b>2015</b>	<b>2016</b>
( l )	2013 Average Labor Rate <sup>6</sup>	\$ 45.27	\$ 45.27	\$ 45.27
( m )	5 Year Average Non-Labor Per FTE <sup>6</sup>	\$ 9,563	\$ 9,563	\$ 9,563
( n )	2013 Operations FTE Per Supervisor FTE <sup>6</sup>	12	12	12
( o ) = ( g / n )	Total Labor (FTE)	113	116	124
( p ) = ( o * l * a )	<b>Total Supervisor Labor (\$)</b>	<b>\$ 10,715,737</b>	<b>\$ 10,984,717</b>	<b>\$ 11,761,301</b>
( q ) = ( o * m )	<b>Total Supervisor Non-Labor (\$)</b>	<b>\$ 1,083,964</b>	<b>\$ 1,111,173</b>	<b>\$ 1,189,729</b>

**Notes:**

- 1 - Adjustments made to remove on-prem time associated with 3 order types under Meter Work (Capital): Met Set Turn On, Meter Set Left Off, and Meter Set PSI. The on-prem time for these orders are contained in the testimony of SoCalGas witness Frank Ayala, Ex SCG-04.
- 2 - Detailed Calculations are Shown on Section 2 "Operations Training Labor"
- 3 - Detailed Calculations are Shown on Section 3 "Operations Non-Labor"
- 4 - Values Corresponds to Total Shown for ( O ) "Total Forecasted Workload With Vacation & Sick (FTE)"
- 5 - Values Corresponds to Total Shown for ( M ) "Total Forecasted Workload With Vacation & Sick (Dollars)"
- 6 - Detailed Calculations are Shown on Section 4 "Supervisor Labor & Non-Labor"



Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Attachment to ORA-SCG-DR-052-TLG, Question 21

Exhibit Reference: SCG-10 Customer Services Field and Meter Reading

Expenses shown in 2013\$, 5 year average training to work ratio, 2013 hourly training rate

		<u>OPERATIONS TRAINING LABOR</u>				
Calculation Step	Description	2009	2010	2011	2012	2013
( A )	Adjusted Recorded Training Dollars (In Nominal Dollars, Without Vacation & Sick)	\$ 3,541,794	\$ 3,669,173	\$ 4,121,966	\$ 4,774,003	\$ 5,031,069
( B )	Vacation & Sick (Dollars Factor)	0.1807	0.1748	0.1661	0.1601	0.1662
( C ) = ( A * ( 1 + B ) )	Adjusted Recorded Training Dollars (In Nominal Dollars, With Vacation & Sick)	\$ 4,181,796	\$ 4,310,545	\$ 4,806,624	\$ 5,538,321	\$ 5,867,233
( D )	Labor O&M Escalation Rate	0.9073	0.9307	0.9549	0.9765	1.0000
( E ) = ( C / D )	Adjusted Recorded Training Dollars (In 2013 Dollars, With Vacation & Sick)	\$ 4,608,897	\$ 4,631,299	\$ 5,033,770	\$ 5,671,610	\$ 5,867,233
( F ) = ( A / H )	Adjusted Recorded Training Wage Rate (In Nominal Dollars)	\$ 31.73	\$ 33.25	\$ 32.66	\$ 33.16	\$ 34.54
( G ) = ( F / D )	Adjusted Recorded Training Wage Rate (In 2013 Dollars)	\$ 34.97	\$ 35.73	\$ 34.20	\$ 33.95	\$ 34.54
( H )	Adjusted Recorded Training Hours (Without Vacation & Sick)	111,631	110,336	126,208	143,986	145,667
( I )	Vacation & Sick (Hours Factor)	0.1891	0.1808	0.1711	0.1659	0.1690
( J ) = ( H * ( 1 + I ) )	Adjusted Recorded Training Hours (With Vacation & Sick)	132,740	130,285	147,802	167,874	170,285
( K )	Annual Paid Hours	2,088	2,088	2,080	2,088	2,088
( L ) = ( J / K )	Adjusted Recorded Training FTEs (With Vacation & Sick)	64	62	71	80	82
( M )	Total Adjusted Recorded WorkLoad FTEs	1,244	1,247	1,202	1,187	1,181
( N ) = ( L / M )	Training FTE as Percentage of Workload FTEs	5.1%	5.0%	5.9%	6.8%	6.9%
( O ) = Average L ( 2009 - 2013 )	5 Year Average Adjusted Recorded Training FTEs	72				
( P ) = Average M ( 2009 - 2013 )	5 Year Average Recorded Adjusted Workload FTEs	1,212				
( Q ) = ( O / P )	<b>5 Year Average Training to Workload Ratio</b>	<b>5.9%</b>				
( R ) = G ( 2013 Value )	<b>2013 Hourly Training Rate</b>	<b>\$ 34.54</b>				

Attachment to ORA-SCG-DR-052-TLG, Question 21  
 Exhibit Reference: SCG-10 Customer Services Field and Meter Reading  
 Expenses shown in 2013\$, Average Non-Labor per FTE

Calculation Step	Description	<u>OPERATIONS NON-LABOR</u>				
		2009	2010	2011	2012	2013
( A )	Adjusted Recorded Non-Labor (In 2013 Dollars)	\$ 6,726,600	\$ 6,804,099	\$ 6,843,877	\$ 7,053,142	\$ 6,698,664
( B )	Seasonal Contractors Adjustment <sup>1</sup>	\$ (1,104,404)	\$ (1,061,576)	\$ (1,047,236)	\$ (945,689)	\$ (479,273)
( C ) = ( A + B )	Total Adjusted Recorded Non-Labor	\$ 5,622,196	\$ 5,742,523	\$ 5,796,641	\$ 6,107,453	\$ 6,219,391
( D ) = Average C ( 2009 - 2013 )	5 Year Average Non-Labor Costs	\$ 5,897,641				
( E )	5 Year Average of Total FTE (Workload + Training)	1,284				
( F ) = ( D / E )	<b>5 Year Average Non-Labor Cost Per FTE</b>	<b>\$ 4,592</b>				

Notes:

1 - Labor expenses for seasonal contractors are already forecasted for in the zero based workload forecast but are recorded as non-labor costs to Operations. Therefore this adjustment is required in order to not double count the costs associated with seasonal contractors.

Appendix C - ORA Data Request (ORA-SCG-052-TLG) and SoCalGas' Response

Attachment to ORA-SCG-DR-052-TLG, Question 21

Exhibit Reference: SCG-10 Customer Services Field and Meter Reading

Expenses shown in 2013\$, Average Supervisor Wage Rate, Average Supervisor non-labor per FTE, average field technicians to supervisor ratio

		<u>SUPERVISOR LABOR &amp; NON-LABOR</u>				
Calculation Step	Description	2009	2010	2011	2012	2013
( A )	Annual Paid Hours	2,088	2,088	2,080	2,088	2,088
( B )	Adjusted Recorded Supervisor Labor (FTE)	109	118	134	127	107
( C )	Adjusted Recorded Operations Training FTEs (With Vacation & Sick)	64	62	71	80	82
( D )	Total Adjusted Recorded Operations WorkLoad FTEs	1,244	1,247	1,202	1,187	1,181
( E ) = ( C + D )	Total Operations FTE	1,308	1,310	1,273	1,268	1,263
( F ) = ( E / B )	Average Supervisor FTE to Operations FTE Ratio	12	11	9	10	12
( G )	Adjusted Recorded Supervisor Labor (In 2013 Dollars, With Vacation & Sick)	\$ 10,126,880	\$ 10,839,294	\$ 12,484,853	\$ 11,918,137	\$ 10,143,512
( H ) = ( G / ( A * B ) )	Average Supervisor Wage Rate (In 2013 Dollars)	\$ 44.45	\$ 44.03	\$ 44.66	\$ 44.87	\$ 45.27
( I )	Adjusted Recored supervisor Non-Labor (In 2013 Dollars)	\$ 1,247,087	\$ 1,195,789	\$ 1,166,003	\$ 1,115,272	\$ 974,273
( J ) = Average B ( 2009 - 2013 )	5 Year Average Supervisor Labor (FTE)		119			
( K ) = Average I ( 2009 - 2013 )	5 Year Average Supervisor Non-Labor (\$)	\$	1,139,685			
( L ) = H ( 2013 Value )	<b>2013 Average Supervisor Wage Rate</b>	\$	<b>45.27</b>			
( M ) = ( K / J )	<b>5 year Average Supervisor Non-Labor Per FTE</b>	\$	<b>9,563</b>			
( N ) = F ( 2013 Value )	<b>2013 Supervisor FTE to Operations FTE Ratio</b>		<b>12</b>			

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

22. SCG's TY 2016 forecast for its Customer Services Field Operations include incremental funding of \$5.213 million (\$15.639 million over three years) for appliance safety checks, customer education while on customer premises and customer outreach safety checks.
- a. SCG states on page SAF-15 that "Contingent on receiving funding in this GRC proceeding and beginning in 2016, SoCalGas proposes that when a customer requests an appliance check, the Customer Service Representative ("CSR") will offer the option of having the field technician check all of the customer's gas appliances when the technician is at the customer's premise." Provide documentation that explains in detail if SCG has ever offered (2004-2014) to check all of the customer's gas appliances when the technician is at the customer's premise. If yes, provide historical costs incurred for this service. If no, state clearly why SCG never utilized authorized ratepayer funds to offer this service prior to its 2016 GRC.
  - b. Provide documentation that explains if SCG is authorized incremental funding for its CSRs to "offer the option of having the field technician check all of the customer's gas appliances when the technician is at the customer's premise", and SCG's customers decline the service, or SCG is unable to provide the service, will SCG refund the unspent funds for this "option" back to ratepayers.
  - c. Provide documentation that explains in more detail SCG's proposal. If SCG is not authorized incremental funding of \$1.337 million (\$4.011 million over three years) is it SCG's position that it will refuse to provide or "offer the option of having the field technician check all of the customer's gas appliances when the technician is at the customer's premise." If this is not SCG's position, provide documentation that explains what SCG means by its statement on page SAF-15 that "Contingent on receiving funding in this GRC proceeding and beginning in 2016."
  - d. SCG's Table SAF-7 on pages SAF-10 and SAF-11 show the historical and forecast order volumes. SCG's historical order volumes show declining order volume trends each year between 2009-2013. With this in mind, SCG utilized four and five year averages to calculate TY 2016 estimates for the majority of its order volumes and this method would provide SCG with incremental funding over 2013 levels.

Provide documentation that explains specifically why SCG is unable to utilize its 2013 expense levels or reallocate funding in the TY 2016 from eliminated or declining activities so that it could offer the option of having the field technician check all of the customer's gas appliances, spend additional time on premise to ask the customer if they have a CO detector and explain to the customer the legal requirements and importance of installing a CO detector, demonstrate for customers, using its ratepayer funded mobile data terminal (MDT), the types of safety and other information and programs available to customers, hand out material/postcards, direct customers to SCG's website (socialgas.com), and perform customer outreach safety checks.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

**Question 22 (Continued)**

- e. Provide documentation that explains in more detail SCG's proposal. If SCG is not authorized incremental funding of \$1.367 million (\$4.101 million over three years) is it SCG's position that it will refuse to provide or offer to "spend additional time on premise to ask the customer if they have a CO detector" and refuse to "explain to the customer the legal requirements and importance of installing a CO detector" while the technician is already at the customer's premise. If this is not SCG's position, provide documentation that explains what SCG means by its statement on page SAF-16 that "Contingent on receiving funding in this GRC proceeding and beginning in 2016."
- f. Provide documentation that explains in more detail SCG's proposal. If SCG is not authorized incremental funding of \$1.367 million (\$4.101 million over three years) is it SCG's position that it will refuse to provide or offer, using its ratepayer funded mobile data terminal (MDT), to demonstrate to customers the types of safety and other information and programs available to customers" or hand out material and direct customers to SCG's website (socialgas.com) for safety and other information while the technician is already at the customer's premise. If this is not SCG's position, provide documentation that explains what SCG means by its statement on page SAF-16 that "Contingent on receiving funding in this GRC proceeding and beginning in 2016."
- g. Provide documentation that explains in detail if SCG has ever offered (2009-2014) to spend additional time on premise to ask the customer if they have a CO detector and explain to the customer the legal requirements and importance of installing a CO detector, demonstrate for customers, using its ratepayer funded mobile data terminal (MDT), the types of safety and other information and programs available to customers, hand out material and direct customers to SCG's website (socialgas.com). If yes, provide historical costs incurred for these services. If no, state clearly why SCG never utilized authorized ratepayer funds to address these activities prior to its 2016 GRC.
- h. SCG states on SAF-17 that "Approximately 42% of SoCalGas' customers have not requested field technician service from SoCalGas within the last seven years. In support of SoCalGas' goal to continuously improve safety, contingent on receiving funding in this GRC proceeding and beginning in 2016, SoCalGas proposes to mail postcards to customers offering them the opportunity to have a field technician come out to the customer's premise to perform a safety check on all of the customer's gas appliances."

Provide documentation that explains in more detail SCG's proposal. If SCG is not authorized incremental funding of \$2.509 million (\$7.527 million over three years) is it SCG's position that it will refuse to contact customers that have not requested services in seven years and refuse "to mail postcards to customers offering them the opportunity to have a field technician come out to the customer's premise to perform a safety check on all of the customer's gas appliances." If this is not SCG's position, provide documentation that explains what SCG means by its statement on page SAF-17 that "contingent on receiving funding in this GRC proceeding and beginning in 2016."

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

**Question 22 (Continued)**

- i. Provide documentation that explains in detail why SCG has not utilized authorized funding prior to its 2016 GRC to “mail postcards to customers offering them the opportunity to have a field technician come out to the customer’s premise to perform a safety check on all of the customer’s gas appliances” if its “goal” is to “continuously improve safety.”
- j. Provide documentation that explains how long SCG’s management was aware that “Approximately 42% of SoCalGas’ customers have not requested field technician service from SoCalGas within the last seven years.”

**SoCalGas Response 22:**

- 22.a. SoCalGas’ practice has been to only check the particular appliance(s) for which the customer specifically requested service, not all appliances at the customer’s premise. Historical and previously-authorized costs do not include the added time and cost that is required to offer to check all appliances and to check all appliances. SoCalGas is proposing this additional service in order to further enhance safety.
- 22.b. Recognizing the many variables and priorities that are subject to change during any rate case cycle, longstanding Commission policy has been to authorize funding levels and then allow the utilities to manage operations within those funding levels. SoCalGas does not believe it would be appropriate to change Commission policy in this context. Nonetheless, SoCalGas has every intention of offering this enhanced safety service, in a manner consistent with authorized funding levels. That is, if the Commission authorizes funding for this proposed service, then SoCalGas will proceed with planning and implementation to offer this service. If the Commission does not authorize funding for this new service, then SoCalGas will not proceed with offering this service.
- 22.c. SoCalGas’ practice has been to only check the particular appliance(s) for which the customer specifically requested service, not all appliances at the customer’s premise. For example, if a customer calls and requests service for a water heater, but they also have a natural gas clothes dryer and wall heater, the field technician will only service the water heater. SoCalGas would not refuse to check the other two appliances if the customer specifically requested service on all three appliances; however SoCalGas would not proactively approach the customer to offer a check of all three appliances unless it receives the funding needed to do so.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

**SoCalGas Response 22: Continued**

- 22.d. Relying solely on total order volume trends, rather than order volume trends for each individual work order type, would ignore key factors impacting individual order types and therefore yield a less accurate forecast of order volumes. Please see SoCalGas' response to Question 21.c. regarding the forecast methodology SoCalGas used for each order type. Please see SoCalGas' response to Question 10 for explanations of why 2013 expenses and staffing levels are not sufficient to support incremental activities.
- 22.e-f With its proposed Enhanced Customer Education While On Customer Premises, SoCalGas proposes to spend an additional 1.5 minutes on premise (for entered orders where the customer is present) to educate customers on carbon monoxide (CO) detector requirements (Senate Bill 183) and demonstrate the types of safety and other information and programs available on SoCalGas' website. If SoCalGas does not receive the funding to cover the incremental cost of this enhanced service (i.e., labor costs associated with the additional time spent on premise), SoCalGas will not proactively offer/provide this service. Nonetheless, SoCalGas will continue to be responsive to specific customer requests/questions as they arise.
- 22.g. SoCalGas field technicians have not historically spent time while on premise to educate customers on CO detectors, nor have they demonstrated the types of safety and other information and programs available to customers on SoCalGas' website. Senate Bill 183 became effective in 2011 and no funding was previously requested or authorized for this service. Similarly, prior to the rollout of new mobile data terminals in 2013-2014, SoCalGas field technicians were not able to access SoCalGas' website in the field and therefore had no way of demonstrating the types of safety and other information and programs available to customers on socialgas.com.
- 22.h-i. SoCalGas does not have additional documentation beyond that which has already been provided in the testimony and workpapers of SoCalGas witnesses Sara Franke and Evan Goldman (Exs. SCG-10, SCG-10-WP, SCG-11 and SCG-11-WP). Without the funding to cover the cost, SoCalGas would not offer its proposed Outreach Safety Checks, as set forth in Ex. SCG-10, page 17. SoCalGas has not requested nor been authorized funding for this service in the past hence this service has not been provided by SoCalGas. The need for this expanded safety service was identified as SoCalGas was preparing for its TY 2016 GRC.
- 22.j. The fact that 42% of SoCalGas' customers have not requested field technician service within the last seven years was identified as SoCalGas was preparing for its TY 2016 GRC.

**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

25. For SCG's Meter Work (O&M) – Meter Change – Entered (forecast to increase by 106.81% over 2013 levels) and Meter Work (O&M) – Meter Change – Not Entered (forecast to increase by 144.35% over 2013 levels) shown on page SAF-9, SCG states the TY 2016 forecast method of 180,000 per year is the "Annual meter replacements adopted in D.13.05.010 and projected for TY 2016." Based on information shown in Table SAF-7 on page SAF-11, SCG's Meter Work (O&M) – Meter Change – Entered and Meter Work (O&M) – Meter Change – Not Entered show declines in order volumes between 2009-2013.
- a. SCG states on page SAF-11 that "beginning in 2013, CSF focused on curb meter changes while the AMI project team focused on above-ground meter changes." Prior to 2013, provide the curb meter changes and above-ground meter changes and associated labor and non-labor costs. In the response include the number of FTE's that performed this activity for meter changes before and during 2013 and in 2014.
  - b. For the 180,000 per year "Annual meter replacements adopted in D.13.05.010" provide documentation that explains if SCG completed the 180,000 meter replacements for 2012, 2013 and 2014. If not, state why this was not done and provide the number of actual meter replacements and related costs for 2012, 2013, and 2014.
  - c. Provide documentation that explains if the 180,000 per year "Annual meter replacements adopted in D.13.05.010" includes both curb meter changes and above-ground meter changes.
  - d. Provide documentation that demonstrates the amount SCG was authorized in D.13-05-010 to address the 180,000 per year "Annual meter replacements."
  - e. Provide documentation that explains if prior to 2013, SCG failed to adhere to the AMI implementation schedule.

**SoCalGas Response 25:**

- 25.a. The table below provides the number of curb and above-ground small meter replacements Customer Services Field completed during 2009-2013. SoCalGas does not track expenses at the level of detail requested. However, in an effort to be responsive, SoCalGas has estimated labor expenses for the small meter replacements by using the average recorded on premise time per small meter change and the average 2013 labor rate for CSF technicians who perform small meter replacements. The costs exclude drive time and other ancillary costs (e.g., non-job time, Vacation and Sickness, training time) not specifically associated with performing meter changes. In 2009-2012 all labor was charged to O&M. Beginning in 2013, for curb meter replacements only, labor was split 50/50 between O&M and capital. Labor is charged 50/50 to capital and O&M for curb meter replacements because the existing curb meters are incompatible with AMI technology. Estimates of non-labor expenses are not available. 2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015.



**ORA DATA REQUEST  
ORA-SCG-DR-052-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 3, 2015  
DATE RESPONDED: FEBRUARY 24, 2015**

**SoCalGas Response 25:-Continued**

25.c-d. The 2008 Settlement Agreement with DRA and TURN, Decision (D.) 08-07-046, explicitly authorized SoCalGas to “strive to perform 180,000 planned meter change-outs”. The 180,000 meter changes identified in D.08-07-046 include curb and above ground meters. In the 2012 GRC, SoCalGas forecasted 180,000 meter replacements, the same that were authorized in D.08-07-046. Although the 2012 GRC decision, D. 13-05-010, reduced SoCalGas’ CSF overall forecast, there was not an explicit reduction made to the forecasted meter replacements. As stated in the response to Question 4.a. in data request ORA-SCG-DR-021-DAO, over the course of the AMI deployment period (2013 – 2017), all GRC- and AMI-funded planned meter change-outs will be completed.

25.d. In the 2012 GRC, SoCalGas’ CSF-Operations forecast to replace 180,000 small meters was \$7.471 million (in 2009 dollars). D.13-05-010 did not explicitly adopt or disallow this forecast.

In responding to this question, SoCalGas recognized that an incorrect Decision number was referenced for the rationale for the meter replacement forecast (Ex. SCG-10, page SAF-8, Table SAF-6). “D.13-050-010” will be corrected to “D.08-07-046 in errata.

25.e. AMI mass deployment (AMI module installation) did not begin until 2013.