

Company: Southern California Gas Company (U904G)
Proceeding: 2016 General Rate Case
Application: A.14-11-004
Exhibit: SCG-212

SOCALGAS

REBUTTAL TESTIMONY OF ANN D. AYRES

(CUSTOMER SERVICE - INFORMATION)

June 2015

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



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Appendix B - Lee, Jessica. “Brands Expected to Respond Within an Hour on Twitter [Study]”, Search Engine Watch, November 1, 2013.

Appendix C – 2013 Safety and Winter Conservation Messaging Campaign Examples

Appendix D - National Consortium for the Study of Terrorism and Responses to Terrorism. “Social Media Use during Disasters”, December 12, 2012.

Appendix E – Werner, Carrie A. “The Older Population: 2010, 2011 Census Briefs”, United States Census Bureau, November 2011.

Appendix F – Detailed list of items and totals from 2009-2013 that ORA has identified as “not necessary or required to operate the utility business”.

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**SOCALGAS REBUTTAL TESTIMONY OF ANN D. AYRES
(CUSTOMER SERVICE - INFORMATION)**

I. SUMMARY OF DIFFERENCES

**TABLE ADA-1
Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses
SoCalGas CS-I
Operating & Maintenance (“O&M”) Expenses**

TOTAL O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
Non-Shared			
SoCalGas	\$17,073	\$24,635	\$7,562
ORA	\$17,073	\$19,082	\$2,010
TURN	\$16,952	\$24,514	\$7,562
Shared			
SoCalGas	\$2,912	\$3,398	\$486
ORA	\$2,912	\$3,398	\$486
TURN	\$2,912	\$3,398	\$486

Capital Expenses

TOTAL CAPITAL* - Constant 2013 (\$000)			
	2014	2015	2016
SoCalGas	\$4,411 ¹	\$12,717	\$2,478
ORA	\$3,950	\$11,761 ²	\$2,478
TURN	\$4,411	\$12,717	\$2,478

*Capital funding is in Witness Chris Olmsted’s testimony. CS-I sponsors the business justification.

II. INTRODUCTION

The purpose of this rebuttal testimony is to address the intervenor testimony of ORA, TURN, and the Joint Minority Parties regarding (“SoCalGas” or “SCG’s”) Customer Service - Information (“CS-I”) request for Test Year (“TY”) 2016.

¹ Ex.SCG-12-R, Table 1 for Capital 2014 \$s should reflect \$4,411 instead of \$5,069.

² ORA agrees with SoCalGas 2015 capital \$s, but incorrectly cited SoCalGas 2015 Capital as “\$11,761” when in fact, it should be “\$12,717”.

1 **A. ORA**

2 The Office of Ratepayer Advocates (“ORA”) issued its report on the results of operations
3 for San Diego Gas & Electric Company and Southern California Gas Company TY 2016 GRC
4 Customer Services (Customer Services – Information) on April 24, 2015.³ As shown in Table
5 ADA-1 above, ORA’s recommendations would reduce SoCalGas’ request for non-shared costs
6 from \$24.635 million to \$19.082 million (\$6.637 million for Customer Engagement & Insights,
7 \$3.196 million for Customer Assistance, and \$9.249⁴ million for Customer Segment Markets).

8 ORA does not take issue with SoCalGas’ 5-year average forecast (2009-2013) to form
9 the basis for the Test Year, nor does it question the merits of the incremental requests. Instead,
10 ORA’s approach is to essentially propose that this 5-year average of historical expenditures is
11 adequate to cover incremental funding for new programs effective in TY 2016. ORA’s
12 recommended reductions, however, lack factual support and do not reasonably consider the
13 realities of changing customer needs and increased regulations. Moreover, in many instances,
14 ORA selectively ignores SoCalGas’ direct testimony and responses to ORA data requests which
15 clearly identify forecasted incremental expenditures.⁵ As explained in this rebuttal testimony, the
16 costs for the incremental programs are not embedded in historic recorded expenses and
17 additional resources are needed to meet the changing customer expectations and regulatory
18 requirements.

19 The following summarizes my rebuttal testimony:

20 **i. Customer Engagement & Insights (“CEI”)**

21 SoCalGas used a 5-year average forecast (2009-2013) to form the basis for the Test Year.
22 Added to this base cost are costs associated with incremental activities to improve customer
23 outreach, respond to customer expectations and meet regulatory requirements. While ORA does
24 not take issue with SoCalGas’ proposed 5-year average forecast, ORA effectively disallows most
25 of the incremental costs proposed by SoCalGas in TY 2016 and argues that the 5-year average
26 forecast captures fluctuations in costs, as well as incremental funding for proposed activities.
27 ORA does not oppose these incremental activities, nor does ORA identify existing SoCalGas

³ Ex. ORA-13.

⁴ ORA accepts the non-shared Energy Markets & Capacity Products forecast amount of \$2.078 million and recommends the 2014 actuals for Segment Services \$7.171 million. This totals to the \$9.249 million for Customer Segment Markets, which ORA incorrectly sums to \$9.219 in their testimony.⁴ SoCalGas assumes the sum ORA recommended is meant to add up to \$9.249 million.

⁵ See SoCalGas response to ORA-SCG-DR-042-TLG, Appendix A.

1 activities that should be eliminated. Instead, ORA recommends that the funding required for the
2 new or expanded programs be denied. In effect, ORA argues that the incremental activities
3 should be performed without incremental funding. This logic should be rejected because the new
4 and expanded activities (as detailed in Table 5 of my prepared direct testimony)⁶ are additional
5 activities not captured in historical costs and are costs necessary to meet the needs and
6 expectations of the customers in TY 2016.

7 **ii. Customer Assistance**

8 ORA uses flawed logic with respect to the Customer Assistance activities. While ORA
9 does not take issue with SoCalGas' proposed 5-year average forecast to establish the basis, ORA
10 essentially argues that incremental activities are embedded in historical expenditures and are
11 adequate to fund these incremental activities and programs going forward.

12 ORA ignores the fact that requested incremental funding for natural gas appliance testing
13 ("NGAT") is directly related to the Low Income Energy Efficiency ("LIEE") Proceeding (A.14-
14 11-011), and the Commission decision for cost recovery of these NGAT charges. The additional
15 \$807,000 in TY 2016 above the 5-year average forecast is required to comply with Commission
16 directives to support the ongoing tests required on Energy Savings Assistance ("ESA") Program
17 serviced homes to meet the Commission's 100% programmatic initiative by 2020.⁷ The costs
18 proposed for the NGAT should align with the LIEE decision and should not be disallowed.

19 **iii. Customer Segment Markets**

20 ORA accepts SoCalGas' TY 2016 forecast for its Energy Markets & Capacity Products.
21 However, ORA does take issue with SoCalGas' Customer Segment Markets TY 2016 forecast.
22 ORA incorrectly uses SoCalGas' 2014 adjusted-recorded for Segment Services, and does not
23 take into account the incremental funding request of new activities. ORA's proposal to use 2014
24 adjusted-recorded expenses as a forecast basis is inappropriate as the GRC forecast was
25 developed according to the Rate Case Plan. The Rate Case Plan did not contemplate the use of
26 2014 recorded data. Although ORA's forecast does provide for some increase in funding over
27 the 2013 base year, the increase is inadequate to provide the needed support to the small/medium
28 business customers, home builders, and support for new activities targeted to the specific needs
29 of residential seniors, renters and landlords. Additionally, to meet California's 2020 greenhouse

⁶ Ex. SCG-12-R, ADA-18, Table 5.

⁷ D. 08-11-031 Conclusion of Law 39 page 219.

1 gas reduction goals, including the recent executive order establishing a greenhouse gas reduction
2 target of 40% below 1990 levels by 2030, incremental funding will increase efforts to accelerate
3 the use of small combined heat and power (“CHP”) systems.⁸ These incremental activities are
4 critical for California to achieve these aggressive statewide greenhouse gas reduction goals.

5 ORA recommends disallowing most of the incremental funding needed to serve the needs
6 of customers arguing that the costs are embedded in the historical spending, when in fact
7 greenhouse gas reduction goals have become more aggressive and increased program spending
8 will be needed to meet these goals. Accordingly, ORA’s recommendation should be rejected.

9 **B. TURN**

10 The Utility Reform Network (“TURN”) submitted testimony on May 15, 2015.⁹ TURN
11 does not take issue with my prepared direct testimony with the exception of historical costs for
12 “tickets to sporting and cultural events” and “clothing and other gear.” The following is a
13 summary of TURN’s positions:

14 **i. Tickets to Sporting and Cultural Events**

15 TURN contends that tickets to sporting and cultural events are costs that are not
16 necessary to provide utility service and should be removed.¹⁰ These costs identified by TURN in
17 Customer Service – Information total \$53,008 in base year 2013.¹¹ These expenses were used
18 specifically for the purposes of developing and strengthening customer relationships as well as
19 building program participation.

20 Use of tickets for sporting and cultural events with customers is a very common business
21 practice across all industries. SoCalGas’ use of these events are for developing and maintaining
22 customer relationships and increasing customer participation in CPUC supported services. These
23 costs represent less than 3% of our total customer engagement meetings, and are reserved for
24

⁸ April 29, 2015, Governor Brown has issued an executive order to establish California greenhouse gas reduction target of 40 percent below 1990 levels by 2030.

⁹ Prepared testimony of William B. 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”, May 15, 2015, (“Ex. TURN, Marcus”).

¹⁰ Ex. TURN testimony, Marcus, p. 46, Section V.C.

¹¹ Ex. TURN testimony, Marcus, p. 47, Table 16.

1 specific, defined business purposes.¹² These include discussions on regulatory and rate changes,
 2 business development, air quality regulations, tariff compliance and changes, contracts, and
 3 natural gas and pipeline safety. These targeted meetings may also include discussions for a
 4 customer’s participation as a technology demonstration site (to showcase innovations on energy
 5 conservation or new technologies), or for providing feedback on new business and program
 6 processes, assessing customer needs and industry concerns. SoCalGas maintains a proactive
 7 presence with our commercial/industrial customers as they represent a significant component of
 8 the customer base. Economic development with business customers and growth in program
 9 participation helps reduce the cost to serve all customers. Table ADA-2 below, summarizes in
 10 greater detail, TURN’s proposed disallowance of expenses for tickets to sporting and cultural
 11 events at the workpaper level.

12 **TABLE ADA-2**
 13 **CS-I Summary of Expenses for Tickets to Sporting and Cultural Events**

Exhibit No.	Workpaper	Workpaper Description	Description	Total 2013
SCG-12	2IN004.000	CI-Segment Services	Tickets to Sporting and Cultural Events	\$53,008
Total				\$53,008

14 **ii. Clothing and other Gear**

15 TURN contends clothing and other gear containing the utility’s name and logo (excluding
 16 uniforms, hard hats, etc.) are expenses that are largely promotional and image-building
 17 (giveaways and other materials) and should not be paid for by ratepayers.¹³ These costs
 18 identified by TURN in Customer Service – Information total \$68,479 in base year 2013.¹⁴

19 SoCalGas disagrees. These types of expenses are not for image-building or brand
 20 promotion. SoCalGas provides promotional materials at conferences, seminars, and community
 21 events to promote key messages such as safety, self-service, and energy conservation. Clothing
 22 with the company name is used for customer events to distinguish SoCalGas employees and

¹² Not every single face-to-face customer meeting touch points are recorded. 3% is a conservative derivation based on the number of sporting ticket events used in a given year, divided by the number of individual face-to-face customer meetings Account Representatives have recorded. This percentage may be even lower in reality.

¹³ Ex. TURN testimony, Marcus, p. 47, Section V.D.

¹⁴ Ex. TURN testimony, Marcus, p. 48, Table 18.

1 identify them as a company representative and information resource. Table ADA-3 below,
 2 summarizes in greater detail TURN’s proposed disallowance of expenses for clothing and other
 3 gear at the workpaper level. TURN’s proposal should be rejected.

4 **TABLE ADA-3**
 5 **CS-I Summary of Expenses for Clothing and other Gear**

Exhibit No.	Workpaper	Workpaper Description	Description	Total 2013
SCG-12	2IN001.000	CI-Customer Engagement & Insights	Clothing, and other promotional gear	\$1,383
	2IN002.000	CI-Customer Assistance	Clothing, and other promotional gear	\$3,835
	2IN004.000	CI-Segment Services	Clothing, and other promotional gear	\$63,261
Total				\$68,479

6 **C. Joint Minority Parties**

7 The Joint Minority Parties (“JMP”) submitted testimony for the Sempra Utilities on May
 8 15, 2015.¹⁵

9 The JMP makes a recommendation to Sempra Utilities that at least 5% of any rate
 10 increases over the three year GRC period be allocated for marketing, outreach and education
 11 focused on those who are hit hardest by any rate increases.¹⁶ SoCalGas agrees that customer
 12 education, communications and outreach to low/moderate income and hard-to-reach customers is
 13 a marketing challenge, but disagrees with the JMP recommendation. The recommendation is
 14 completely unsupported. If the recommendation is to be considered by the Commission, the topic
 15 should be examined in the Low Income Energy Efficiency (“LIEE”) Proceeding. Under current
 16 code and Commission decision, CARE eligible customers (e.g., family of 4 at \$48,500 income)¹⁷
 17 receive an effective 20% discount on their gas bills and are, in part, protected from rate

¹⁵ Gnaizda, Robert and Tadashi Gondai, “Joint Minority Parties Initial Testimony on San Diego Gas & Electric Company (U 902 M) General Rate Case”, May 15, 2015, (“Ex. JMP”).

¹⁶ Ex. JMP, p.13, line 10.

¹⁷ Criteria effective June 1, 2015 to May 31, 2016.

1 increases. SoCalGas has requested \$246,100 in my prepared direct testimony to specifically
2 targeted education, outreach and communications directed at the “hard-to-reach” customers.¹⁸

3 **II. REBUTTAL TO PARTIES’ O&M PROPOSALS**

4 **A. Non-Shared Services O&M**

5 The non-shared O&M costs for Customer Service – Information includes costs for
6 Customer Engagement and Insights, Customer Assistance and Segment Services. Each area is
7 discussed separately.

8 Table ADA-4 and Table ADA-5 summarizes the impact of ORA and TURN’s proposals
9 on TY 2016 estimated expenses for SoCalGas Customer Service – Information non-shared
10 O&M.

11 **TABLE ADA-4**
12 **Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses**
13 **CS-I Non-Shared O&M Expenses Summary**

NON-SHARED O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
SoCalGas	\$17,073	\$24,635	\$7,562
ORA	\$17,073	\$19,082	\$2,010
TURN	\$16,952	\$24,514	\$7,562

14
15

¹⁸ Ex. SCG-12-R, p. ADA-23, line 23.

1 **TABLE ADA-5**

2 **CS-I Non-Shared O&M Expenses Workpaper Level Summary**

NON-SHARED O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
Customer Engagement & Insights			
SoCalGas	\$5,919	\$8,891	\$2,972
ORA	\$5,919	\$6,637	\$718
TURN	\$5,918	\$8,890	\$2,972
Customer Assistance			
SoCalGas	\$2,834	\$4,253	\$1,419
ORA	\$2,834	\$3,196	\$362
TURN	\$2,830	\$4,249	\$1,419
Customer Segment Markets			
<i>Energy Markets & Capacity Products</i>			
SoCalGas	\$1,801	\$2,078	\$277
ORA	\$1,801	\$2,078	\$277
TURN	\$1,801	\$2,078	\$277
<i>Segment Services</i>			
SoCalGas	\$6,519	\$9,413	\$2,894
ORA	\$6,519	\$7,171	\$652
TURN	\$6,403	\$9,297	\$2,894

3 SoCalGas provides responses to each parties' areas of disputed TY 2016 forecasts by work group
4 below.

5 **i. Disputed Cost: Customer Engagement & Insights**

6 **a. ORA**

7 Table ADA-6 summarizes the impact of ORA and TURN's proposals on TY 2016
8 estimated expenses for Customer Engagement & Insights.¹⁹

9

¹⁹ Customer Engagement & Insights is identified as workpaper 2IN001.000 in SCG-12-WP-R.

1 **TABLE ADA-6**

2 **Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses**

3 **Customer Engagement & Insights O&M Expenses**

	Base Year 2013	Test Year 2016	Change
Customer Engagement & Insights	Constant 2013 (\$000)		
SoCalGas	\$5,919	\$8,891	\$2,972
ORA	\$5,919	\$6,637	\$ 718
TURN	\$5,918	\$8,890	\$2,972

4 ORA takes issue with the Test Year O&M forecast for Customer Engagement & Insights
 5 and recommends that SoCalGas’ incremental request of \$2.254 million over the base 5-year
 6 average forecast be disallowed. SoCalGas used a 5-year average forecast (2009-2013) to form
 7 the basis for TY 2016 and then added costs required to fund incremental activities to meet new
 8 regulatory requirements and customer programs. ORA does not dispute the SoCalGas 5-year
 9 average forecast,²⁰ nor does ORA dispute the incremental cost drivers and activities identified in
 10 my prepared direct testimony.²¹ Nevertheless, ORA seems to conclude that the historical expense
 11 level is adequate to cover SoCalGas TY 2016 expenses, including established core business
 12 activities as well as proposed incremental activities or programs to meet customer needs.

13 ORA’s conclusion is misguided. Costs for new activities proposed for TY 2016 were not
 14 captured in historical costs because these activities have not yet occurred. ORA selectively
 15 ignores my prepared direct testimony and responses to ORA data requests which clearly identify
 16 the need for incremental expenditures and clarifies that these incremental or new activities are
 17 not embedded in historical expenses.²² These new activities, as detailed in my prepared direct
 18 testimony and data request responses include:²³

- 19 • Expand messaging for gas safety for dig-in’s, safe appliance use, carbon monoxide poisoning
 20 awareness and earthquake response by customers —this includes new initiatives to
 21 communicate more effectively with Hard-to-Reach customers;²⁴
- 22 • Expand social media communications to better meet customer needs and expectations;²⁵

²⁰ Ex. ORA-13, p.86, line 15.

²¹ Ex. SCG-12-R, p.ADA-16.

²² See SoCalGas response to data request ORA-SCG-042-TLG in Appendix A.

²³ Ex. SCG-12-R, p. ADA-16, Section II.B.3.

²⁴ Ex. SCG-12-R, p. ADA-19, line 1 to p.ADA-22, line 15, and p.ADA-23, line 23 to p.ADA-24, line 25.

²⁵ Ex. SCG-12-R, p. ADA-19, line 1 to p.ADA-22, line 15.

- 1 • Enhance customer service by expanding information availability to customers through
2 eServices and self-help tools—this includes ongoing support of Information Technology
3 capital projects²⁶ (which ORA does not contest)²⁷;
- 4 • Support and enhance data analysis tools to achieve customer behavioral changes that reduce
5 energy usage;²⁸
- 6 • Expand customer research and customer satisfaction analyses to measure evaluate; and
7 anticipate customer information and service needs.²⁹

8 **1. ORA selectively ignores SoCalGas’ direct testimony and responses to data requests**
9 **where SoCalGas explains in detail why these costs are incremental.**

10 ORA’s claims that historical expense levels are sufficient to cover TY 2016 proposals:

11 “SCG’s request for an increase of 50.21% over 2013 adjusted-recorded expenses
12 is not justified.”³⁰

13 “ORA’s estimate of \$6.637 million based on a five year average captures
14 fluctuations in costs, provides incremental funding for proposed activities, and is
15 a reasonable TY expense level for SCG’s Customer Engagement & Insights work
16 group.”³¹

17 ORA is incorrect. As explained in my prepared direct testimony and response to data
18 requests, increased customer demands for more information in new and expanded channels
19 cannot be met with the status quo funding level requests. A 5-year average of historical expenses
20 funding level for TY 2016 is insufficient to provide reasonable levels of support for CEI
21 activities that are significantly greater than 2013 levels. This incremental funding included in my
22 TY 2016 request is required to support growing program needs caused by:

- 23 • Increasing diversity of SoCalGas’ customer segments;
- 24 • Customer information technology adoption, dynamic and expanding communication
25 channels leading to increased customer expectations;
- 26 • Heightened community interest with respect to gas safety; and
- 27 • Expanded special needs, hard-to-reach customer outreach efforts to ensure all customers are
28 uniformly served.

²⁶ Ex. SCG-12-R, p. ADA-25, line 15 to p.ADA-30, line 14.

²⁷ Ex. ORA-13, p.1, line 16.

²⁸ Ex. SCG-12-R, p. ADA-25, line 15 to p.ADA-30, line 14.

²⁹ Ex. SCG-12-R, p. ADA-22, line 16 to p.ADA-23, line 22.

³⁰ Ex. ORA-13, p. 87, line 9.

³¹ Ex. ORA-13, p. 89, line 3.

1 The above justification is explained and factual foundation is provided in my prepared
2 direct testimony and response to data requests.³²

3 Costs included within 2009-2013 are cyclical, periodic, recurring expenses that should be
4 fully captured as core business expenses in a 5-year average. Thus, the 5-year average 2009-2013
5 is not sufficient to fund the proposed incremental activities. SoCalGas' response to ORA-SCG-
6 DR-042-TLG Q.19 identifies specific historic activities that have shown significant growth in
7 activity levels or volume. ORA requested in Q.19.b:

8 "Provide documentation that explains in detail if the same or similar activities as
9 the ones shown page ADA-18 are currently being performed by CS-I FTEs (i.e.,
10 coordinating information and printed information for hard to reach residential and
11 business customers, ad campaigns, production of videos,
12 maintaining/updating/enhancing social media pages, maintaining/updating
13 enhancing socialgas.com web and My Account, maintaining /updating/enhancing
14 mobile applications and software, performing various customer/market research
15 and surveys, community, and customer outreach events, various one-time
16 development and implementation costs, etc.)."

17 SoCalGas response:

18 "Pertaining to Ex. SCG-12, Table 5, on page ADA-18:

- 19
- 20 • Customer Marketing & Communications
 - 21 ○ Historically, CS-I has 1 existing FTE dedicated to supporting social
 - 22 media. As indicated by the growing activity and continued growth
 - 23 trend of social media and volume of communications in Ex. SCG-12,
 - 24 Figure 2, and also described in Ex. SCG-12, Section II.B.3., the
 - 25 volume of activity has increased to necessitate an additional 2 FTEs to
 - 26 support.
 - 27 • Customer Insight & Analytics
 - 28 ○ CS-I has existing research analyst FTEs, however, growing requests
 - 29 from internal stakeholders for research and studies necessitates an
 - 30 additional FTE to support the increased volume of activity.
 - 31 • Creative Services
 - 32 ○ A Customer Engagement & Insights in-house community outreach
 - 33 advisor is a new activity for CS-I.
 - 34 ○ A creative services advisor to provide comprehensive purview and
 - unify communication messaging content (which demonstrated growth

³² Ex. SCG-12-R, ADA-iii and SoCalGas response to data request ORA-SCG-042-TLG (see Appendix A).

1 trends of nearly 3x magnitude from 2012 to 2014) is a new role that
2 CS-I does not historically have a dedicated FTE to perform.

3 • eServices & Data Analysis

- 4 ○ e-Service designer: The My Business Account is a new platform that
5 will require ongoing support, and is a new activity.
6 ○ E-Service analyst: 0.25 of this 1 FTE is to provide ongoing support for
7 a new, completed capital IT project (My Business Account), and to
8 support an existing socialgas.com and My Account platform, which
9 currently does not have dedicated FTEs to provide continual
10 maintenance and enhancement support, and is considered a new
11 activity.
12 ○ E-Service analyst: This FTE is to support Integrated Customer Data
13 Analytics, a new, completed capital IT project that will require
14 ongoing support and is a new activity.
15 ○ Web editor: 0.75 of this 1 FTE is to support My Account Mobile 1C, a
16 new, completed capital IT project that will require ongoing support
17 and is a new activity. 0.25 of this 1 FTE is to support an existing
18 socialgas.com and My Account platform, which currently does not
19 have dedicated FTEs to provide continual maintenance and
20 enhancement support, and is considered a new activity.”

21 SoCalGas has provided to ORA specific activities that are growing and new activities for
22 CEI in my prepared direct testimony and response to ORA’s data request.

23 **2. ORA fails to recognize and incorporate the undisputed growth of existing Customer**
24 **Engagement & Insights activities. More important, a funding level of a 5-year**
25 **average of historical expenses for TY 2016 is insufficient to provide even minimum**
26 **levels of support for CEI activities that are significantly greater than 2013 levels.**

27 ORA states the following:

28 “SCG’s adjusted-recorded expenses have declined between 2010 and 2013 at the
29 same time that its activities in this work group were increasing (i.e., activities
30 associated with Social Media: My Account Mobile, Facebook, Twitter, Instagram,
31 Youtube, etc.)”³³

32 ORA selectively observes spending fluctuations in years 2010 through 2013 and
33 concludes that adjusted-recorded expenses are declining. As stated in my prepared direct
34 testimony,³⁴ a 5-year historical average based forecast methodology was selected to account for
35 periodic and recurring non-labor expenses, without selectively isolating historical expenses in a
36 single year that may overstate or understate costs. Historic periodic non-labor costs include

³³ Ex. ORA-13, p.88, line 9.

³⁴ Ex. SCG-12-R, p.ADA-16, Section II.B.2.

1 software licenses, software upgrades, major design refreshes, and continuing research studies
2 conducted by external services. ORA addressed this 2010 through 2013 expense observation in a
3 data request:

4 “SCG states on page ADA-3 that ‘Generally, my Test Year forecasts are
5 reasonable because they account for cyclical fluctuations and recurring costs
6 attributed to core business functions.’ SCG’s CS-I O&M expenses have declined
7 each year between 2010 and 2013 (see SCG-12-WP page 333) The highest
8 recorded expenses of \$24.143 million were in 2010. Provide documentation that
9 explains specifically what SCG means by ‘cyclical fluctuations and recurring
10 costs’ as it relates to recorded adjusted expenses for 2009-2013”.³⁵

11 SoCalGas responded that the cyclical expenses are normal. These expenses occur in
12 various years during the 2009-2013 period but are not all captured in base year adjusted-recorded
13 expenses. SoCalGas’ response to ORA-SCG-DR-042-TLG, Q.1.a cautioned that expense
14 “declines” over 2010-2013 do not imply that base year spending levels for CS-I are sufficient to
15 maintain and fund existing core business functions because recurring expenses and cyclical
16 fluctuations may not be reflected in the single base year adjusted recorded expenses. Prominent
17 examples of these cyclical fluctuations and recurring costs for Customer Engagement & Insights
18 include (but are not limited to):

- 19 • Website/intranet refreshes typically occur every 3-5 years. These refresh drivers include:
20 changes in customer needs for information and services, changes in web browser
21 behavior/features/security, language translations, improved customer experience; and
22 accessibility updates, etc.;
- 23 • Large research studies which vary and refresh every 2-5 years for various activities such as a
24 2010 study to test the effectiveness of onserts versus inserts in mailings, ‘Voice of Customer’
25 comprehensive customer needs/perception assessment, crisis communications, and secondary
26 research vendor subscriptions.

27 **3. ORA fails to recognize the accelerating growth of existing Customer Engagement &
28 Insights activities.**

29 The rapidly changing and growing technological and digital spaces require SoCalGas to
30 stay current with evolving technologies while not abandoning the legacy platforms. Customers
31 are not solely utilizing one channel but use a variety of channels at any given time. The 5-year
32 average base forecast funding levels are inadequate to meet current and future customer
33 expectations and requirements as communications channels expand.

³⁵ See SoCalGas response to data request ORA-SCG-DR-042-TLG, Q.1.a. in Appendix, Attachment 1.

1 Figure 2 and Figure 3 of my prepared direct testimony are demonstrative of new
2 communication channel historical year-to-year growth.³⁶ These figures have been updated here
3 in this rebuttal testimony to include 2014 numbers (see Figure ADA-1 and Figure ADA-2 below)
4 to demonstrate that the 2009-2013 customer activity growth of these channels did not plateau
5 after 2013 (which ORA implies),³⁷ but continues to increase. SoCalGas requests incremental
6 funding to support, sustain and improve SoCalGas' interactions with customers in these new
7 channels.³⁸ Furthermore, customer communications material production has increased from 483
8 projects annually in 2012 to 782 in 2014 and is on track to surpass 1000 in 2015.

9 The growth of SoCalGas' social media presence and engagement continues to increase
10 year over year and the additional requested support is vital to keep up with our customers'
11 expectations of interaction in their preferred channels. At the end of 2014, SoCalGas' Facebook,
12 Twitter and YouTube channels grew 34%, 93%, and 173%, respectively, when compared to
13 2013. SoCalGas introduced their Instagram channel in late 2013 and by April 2015 has reached
14 400 followers.

15 This growth coupled with customers' expectations of acceptable response times and
16 increasing customer interactions via social media emphasize the need to have additional support
17 and are a cost driver. "More than 70 percent of users expect to hear back from the brand they're
18 interacting with on Twitter, and 53 percent want a response within the hour."³⁹ Our increased
19 support and presence in social media has resulted in expenditures increasing 49% from 2011 to
20 2013 (97% from 2011 to 2014). SoCalGas is requesting a total of \$467,000 for TY 2016
21 spending on social media customer communications.
22

³⁶ Ex. SCG-12-R, p.ADA-21 and ADA-27, respectively.

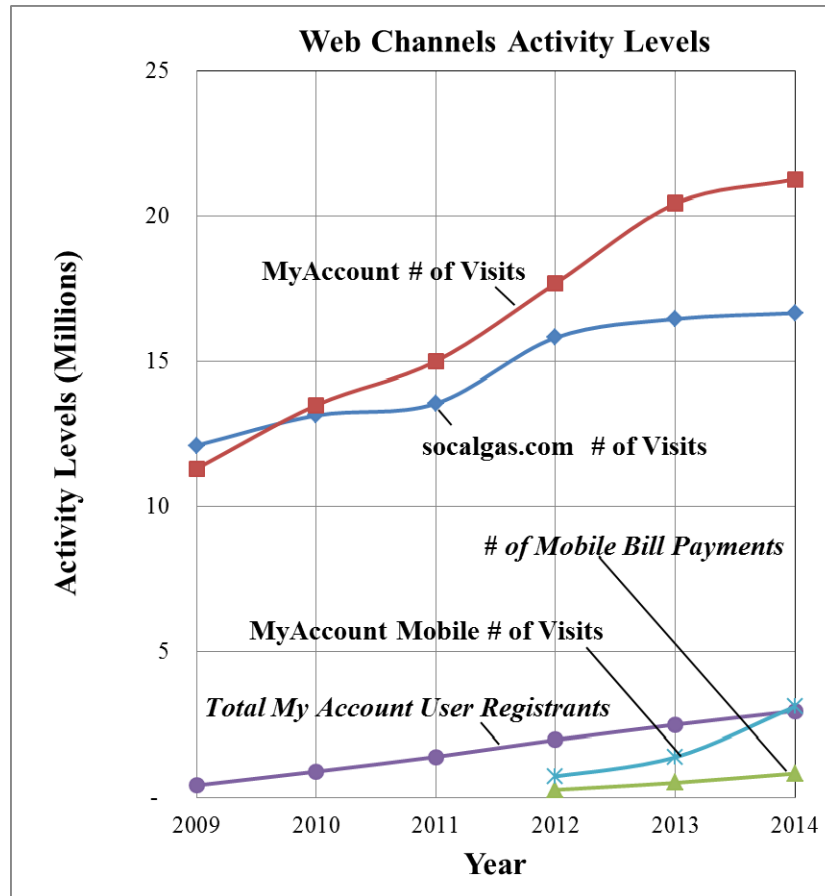
³⁷ Ex. ORA-13, p. 88, line 9.

³⁸ Ex. SCG-12-R, p.ADA-16 "3. Cost Drivers".

³⁹ See Appendix B: Lee, Jessica. "Brands Expected to Respond Within an Hour on Twitter [Study]", Search Engine Watch, November 1, 2013.

1
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FIGURE ADA-1
2009-2014 SoCalGas Web Channels Activity Levels⁴⁰

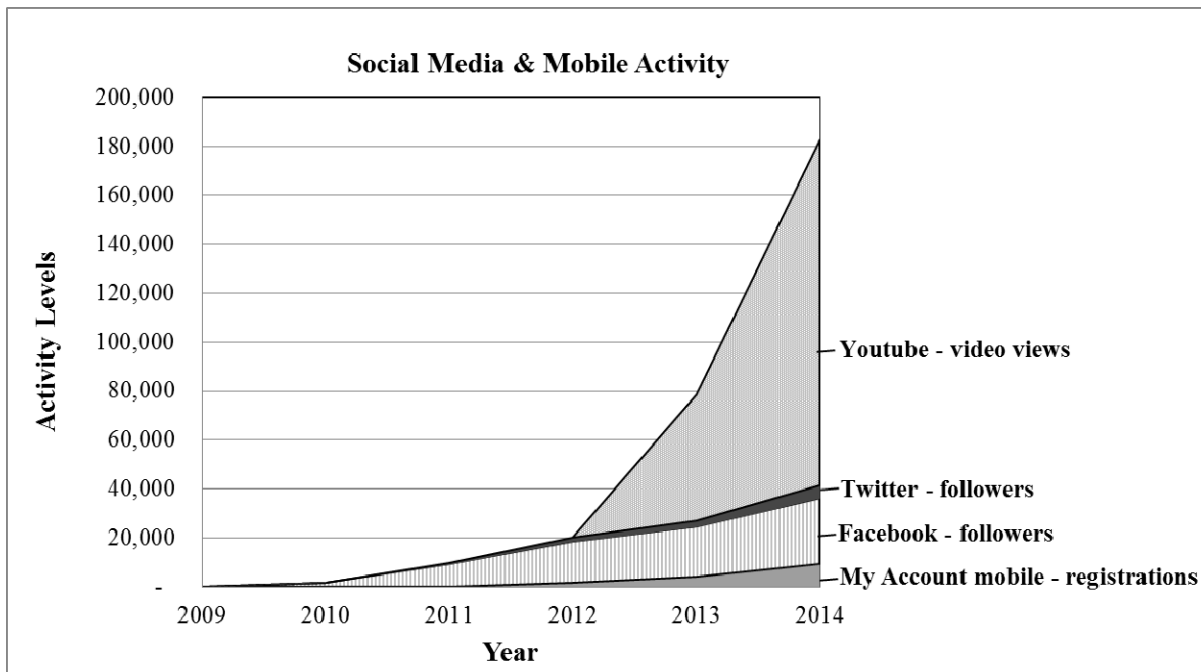


3
4

⁴⁰ This Figure was provided for years 2009-2013 in my prepared direct testimony, Ex. SCG-12-R, p. ADA-27, Figure 3. Note, in my prepared direct testimony, the associated Web Channels Activity table listing “My Account # of Visits” for 2013 to be “29,414,085”. This number should be corrected to “20,437,188”.

1 **FIGURE ADA-2**

2 **2009-2014 SoCalGas Social Media and My Account Mobile Registration Activity Levels**



3
4
5 **4. ORA fails to recognize customers' continued growing needs and changing**
6 **expectations for engagement.**

7 ORA states:

8 “SCG’s response is insufficient and incomplete and did not specifically identify
9 the activity and costs as requested in the question. SCG’s response does not
10 justify incremental funding of 50.21% over 2013 levels for activities that it is
11 currently performing.”⁴¹

12 As stated in my prepared direct testimony,⁴² data request responses,⁴³ and rebuttal
13 testimony (expanded below), I have clearly outlined the incremental activities and associated
14 expenses required.

15 **4.1 Customer Research is critical for SoCalGas to better serve customers.**

16 ORA ignores SoCalGas’ incremental request of a total of \$96,000 (1 FTE) and \$710,000
17 non-labor resources in Customer Insights and Analytics to support program efforts to measure

⁴¹ Ex. ORA-13, p.88, line 6.

⁴² Ex. SCG-12-R, p.ADA-9.

⁴³ See SoCalGas response to data request ORA-SCG-DR-042-TLG, Q.1, Q.10, Q.11, and Q.19 in Appendix A, Attachments 1, 3, 4, and 9 respectively.

1 customer needs, expectations, experience and satisfaction in new research data collection
2 modalities.

3 With the increasing number of customers utilizing online, mobile and social media
4 channels to interact with their service providers, traditional research methodologies are no longer
5 reaching a growing number of customers. In order to capture the opinions and feedback of all
6 SoCalGas customers, SoCalGas must have capabilities for customer contact via new electronic
7 media in a 24/7 cycle. These additional activities will not replace existing research
8 methodologies such as telephone, in person, email or paper, but are additive to the existing
9 channels.

10 Online panels provide measurable, statistically significant results based on timely access
11 to our customers' feedback. Incremental funding of \$170,000 is required to expand the online
12 panels that will allow for multiple surveys simultaneously and additional quick poll surveys for
13 quick and targeted feedback.

14 In conjunction with the quantitative research panels, incremental funding of \$270,000 is
15 requested to develop a qualitative online community (e.g., online focus group). Online
16 qualitative communities allow for diving deeper into issues and get at the underlying motivators
17 of behavior.

18 As a result of the expansion into social media channels and offering the ability to interact
19 and engage through these channels, incremental non-labor funding of \$270,000 is required to
20 expand research data collection via social media and customer behavioral analysis capabilities.
21 Customers are engaging with companies on their terms through multiple channels for multiple
22 reasons. Customer research is no exception. By providing information and services through
23 multiple channels based on customer expectations, SoCalGas must have the capabilities to
24 measure customer experience and opinions through these same multiple channels.

25 Absent this incremental funding, the capability to assess customer needs and expectations
26 of SoCalGas' communications, programs, services and safety issues would be diminished.

27 Below, Table ADA-7 summarizes the incremental request for Customer Insight &
28 Analytics. These activities are not embedded in historical costs.

29

1 **TABLE ADA-7**

2 **Incremental Expenses Summary: Customer Insight & Analytics**

3 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Customer Insight & Analytics	\$96	n/a	1 FTE: research analyst (\$96.1).	\$806
	n/a	\$170	NL: Customer Research Online Panel - for quantitative research of online customer community.	
	n/a	\$270	NL: Qualitative Online Community Research - \$160,000 for qualitative research that works in conjunction with existing quantitative research panels to provide metrics on concepts and media tests through the online community; \$30,000 to build business email and phone # database for research and communication outreach; and \$80,000 to manage and produce survey content to mobile channels.	
	n/a	\$270	NL: Mobile research- \$150,000 to expand CES to include social media surveys, and \$120,000 for customer mobile behavioral data collection and analysis.	

4 **4.2 Social media growth is accelerating.**

5 Historical expense levels in the social media area are not sufficient support to sustain and
 6 improve increasing customer engagement and usage of social channels. In order to meet this
 7 growing need, we are requesting incremental funding of \$167,000 for 2 FTEs and \$300,000 non-
 8 labor to manage and maintain the social media channels.

9 The social media support includes responding to customer inquiries, proactively
 10 monitoring customer interactions, and managing the ongoing, daily development of unique and
 11 specialized content and videos necessary to promote our safety and other program and service
 12 messages our customers expect and demand.

13 Customers interacting in social channels expect to consume content in engaging and
 14 digestible bites, demanding more photos, graphics and videos, unlike traditional communications
 15 channels. To measure the effectiveness of social media efforts, enhanced software tracking and
 16 content management tools are required and are reflected in the incremental request.

1 Of critical importance is the ability of SoCalGas to provide timely and accurate
 2 information during a major crisis or localized event. Social media has become an integral part of
 3 disaster response, providing real-time information, which no other media can provide. “Social
 4 media can become the primary source of time-sensitive disaster information, especially when
 5 official sources provide information too slowly or are unavailable. For example, during the 2007
 6 California wildfires, the public turned to social media because they thought journalists and public
 7 officials were too slow to provide relevant information about their communities.”⁴⁴

8 It is imperative that SoCalGas be adequately staffed and prepared to quickly engage and
 9 respond via social media in an emergency or natural disaster. Use of digital media and the
 10 internet in emergencies, especially if our natural gas system is impacted, will be vital in
 11 communicating critical safety information before, during and after a catastrophe.

12 Table ADA-8 summarizes the incremental request for Customer Marketing &
 13 Communications. These activities are not embedded in historical costs.

14 **TABLE ADA-8**
 15 **Incremental Expenses Summary: Customer Marketing & Communications**
 16 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Customer Marketing & Communications	\$167	n/a	2 FTEs: social media (\$83.4) /communication (\$83.4) advisors.	\$467
	n/a	\$300	NL: Additional engagement and ad campaigns, production of additional video content, enhance current social media software tools to metrics to track effectiveness of social media efforts.	

17
 18

⁴⁴ See Appendix D: National Consortium for the Study of Terrorism and Responses to Terrorism, “Social Media Use during Disasters”, December 12, 2012.

1 **4.3 Funding to Expand Outreach to Hard-to-Reach Customers Should be**
2 **Approved.**⁴⁵

3 SoCalGas has forecasted additional funding of \$329,000 in TY 2016 to increase customer
4 awareness of programs and services. In particular, this incremental funding is focused on hard-
5 to-reach (“HTR”) customers. HTR residential customers are those customers who do not have
6 easy access to program and safety information or generally do not participate in energy
7 efficiency or assistance programs due to limited English proficiency, physical disabilities, visual
8 or hearing impediments, income, housing type, geographic, or home ownership barrier. These
9 customers are a significant portion of SoCalGas’ customer demographics: SoCalGas customer
10 demographics indicate 35% of customers’ language preference is a language other than English,
11 20% of our customers fall under the low income category (household’s total income not to
12 exceed \$35,000 year), and where 30% of customers are aged 55+ years, and 14% of which are
13 seniors aged 65+ years.⁴⁶

14 It is important to reach these customers so they can benefit from the programs and
15 services SoCalGas offers to manage energy usage, bill assistance, and proper and safe use of
16 natural gas appliances. By effectively reaching and educating the HTR segment, the programs
17 and communications can potentially improve these customers’ standard of living.

18 As stated in my prepared direct testimony, incremental resources are required to expand
19 the existing efforts to increase awareness and program participation, specifically reaching out
20 directly to the HTR customers through grassroots collaboration and communication. This
21 includes working closely with community based organizations that serve the disabled community
22 with physical, visual or hearing disabilities. These activities are not captured in the spending
23 history. ORA essentially dismisses the need to fund programs to support the growing needs of
24 HTR customers.

⁴⁵ “Hard-to-Reach” as defined in the Energy Efficiency Policy Manual, Version 5, July 2013: “Hard To Reach residential customers are defined as ‘those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to limited English proficiency, physical disabilities, visual or hearing impediments, income, housing type, geographic, or home ownership (split incentives) barrier.’ Hard to reach business customers also include factors such as business size and lease (split incentive) barriers.

⁴⁶ 2013 SoCalGas customer data plus Nielsen data.

1 Additionally, an incremental FTE was forecasted for a creative services advisor who will
 2 be responsible for managing consistency, timing, and coordination of messaging across
 3 communication channels, which includes support of the HTR activities.⁴⁷

4 Below, Table ADA-9 summarizes the incremental request for Creative Services. These
 5 activities are not embedded in historical costs.

6 **TABLE ADA-9**
 7 **Incremental Expenses Summary: Creative Services**
 8 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Creative Services	\$179	n/a	2 FTEs: 1 community outreach advisor (\$96.1), 1 creative services advisor (\$83.4).	\$329
	n/a	\$150	NL: Development of hard-to-reach community media messages, traveling expenses, flyers, pamphlets, promotional material, and booth costs for regional/local events.	

9 **4.4 Incremental resources to support information technology capital projects**
 10 **should be approved.**

11 In my prepared direct testimony I proposed funding of 4 FTEs to maintain and support
 12 new customer technology systems (capital IT projects) proposed in the testimony of Evan
 13 Goldman.⁴⁸

14 In ORA’s testimony ORA states:

15 “ORA does not take issue here with SDG&E’s and SoCalGas’ proposed
 16 Customer Service capital projects, which are all Information Technology
 17 Projects”.⁴⁹

18 However, ORA ignores my prepared direct testimony for funding incremental labor and
 19 non-labor resources (\$652,000 in TY 2016) which are essential to provide continued
 20 maintenance and support upon completion of Information Technology capital projects.⁵⁰ The
 21 incremental work encompasses the following:

⁴⁷ See Ex. SCG-12-R, p. ADA-24, line 26.

⁴⁸ See Ex. SCG-12-R, Table 6, and Ex. SCG-11, Section IV.B.3, B.4, B.5.

⁴⁹ Ex. ORA-13, p.1, line 16.

⁵⁰ Ex. SCG-12-R, p. ADA-25, line 25 and Table 6.

- 1 • e-Service Designer – An additional FTE is required to maintain usability and overall design
2 of online pages to ensure ease of use, information is easy to find, and tasks (e.g., pay their
3 bill, manage their account, analyze their business usage) can be completed quickly. This
4 resource is responsible for ensuring a satisfactory user experience across the site and correct
5 presentation on new devices (e.g., smart watches, tablets, and smartphones), and
6 incorporating new design standards and new device interfaces.
- 7 • Web Editor – An additional FTE is required to manage the continued expansion of
8 information and customer use of socialgas.com, Mobile Business My Account, Mobile My
9 Account, and iPhone and Android mobile apps. With the continued growth of internet visits
10 via mobile devices and the increasing amount of content maintained on all sites, content
11 needs to be complete, accurate, timely and accessible, including accessibility for disabled
12 customers. This resource is required to maintain content to meet ever-changing accessibility
13 standards and accessible software.
- 14 • E-Services Analysts- Additional resources (2 FTEs) are required to support digital analysis of
15 customer insights to provide actionable information across contact channels. This will allow
16 us to improve customer service and customer experience by offering tailored treatments or
17 services, context-based interactions and comprehensive energy solutions in the preferred
18 customer channel. Additional resources are also needed to support the new Business My
19 Account with troubleshooting and regular maintenance, and capturing and reviewing defect
20 changes and enhancement requests.

21 Below, Table ADA-10 summarizes the incremental request for eServices & Data Analysis.⁵¹

22 These activities are not embedded in historical costs.

23 **TABLE ADA-10**
24 **Incremental Expenses Summary: eServices & Data Analysis**
25 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
eServices & Data Analysis	\$372	n/a	4 FTE: 1 e-Service designer (\$96.1), 2 e-Service analysts (2x\$96.1), and 1 web editor (\$83.4).	\$652
	n/a	\$280	NL: \$215,000 for maintenance of mobile applications, enhancements, and promotion; \$5,000 annual socialgas.com refresh expenses; \$60,000 for intranet gaslines.com platform maintenance.	

26
⁵¹ These FTEs are related to capital IT projects that are described in my direct testimony, see Ex. SCG-12-R, p. ADA-25 to ADA-30, and Table 6.

1 **5. An increase in TY 2016 expenses for CEI is required to meet customer needs, not to**
2 **satisfy internal SoCalGas employees or internal SoCalGas organizations.**

3 ORA states:

4 “During 2010-2013, a period when SCG’s adjusted-recorded expenses showed
5 declines of \$2.457 million, SCG reported that there were no declines in its
6 customer service, communication, experience, and satisfaction levels to internal
7 stakeholders”

8 An increase in TY 2016 expenses for CEI is required to meet customer needs, not to
9 satisfy internal SCG employees or internal SCG organizations. None of the incremental
10 resources included in the TY 2016 request are to increase satisfaction of internal SoCalGas
11 departments or functions. The incremental resources are for the purposes of serving our external
12 customers.

13 **6. Overall, ORA’s conclusion that CEI’s proposed incremental TY activities are**
14 **embedded in historical expenses is without merit. ORA discounts SoCalGas’**
15 **discussions in my prepared direct testimony and responses to data requests that**
16 **address and clarify these activities.**

17 ORA states:

18 “SCG’s proposed TY activities are continuous and/or ongoing in nature and have
19 costs embedded in historical expenses. ²⁴¹
20 ²⁴¹: SCG’s historical expenses (2009-2013) include costs incurred for one-time,
21 non-recurring and unusual expenses (expenses incurred that are not necessary or
22 required to operate the utility business). ORA discovered that SCG did not
23 remove all of these costs (SCG response to ORA-SCG-042-TLG, Q.18) which are
24 incorporated into ORA’s TY2016 estimate and provides embedded funding that
25 SCG can reallocate in the TY for proposed activities (see SCG response to ORA-
26 SCG-042-TLG, Q.17).”⁵²

27 Overall, ORA’s conclusion that CEI’s proposed incremental TY activities are embedded
28 in historical expenses is meritless and discounts my prepared direct testimony and data responses
29 to address and clarify these activities. In fact, SoCalGas removed all costs identified as one-time,
30 unusual, or non-recurring costs for the years 2009-2013, as well as in the 2014 recorded
31 historical expenses provided to ORA. The 2009-2013 exclusions and cost alignment adjustments
32 are detailed in SCG-12-WP-R, pages 11 to 14 for CEI. Additionally, SoCalGas’ response to
33 ORA-SCG-042-TLG, Q.18 (full response provided in Appendix A.8), stated the following:
34

⁵² Ex. ORA-13, p.89, line 1.

1 “Please see the attachment provided in response to question 17 above. The data
2 shows that expenses fluctuate from year to year and across various cost
3 categories, so it is more prudent to analyze the data aggregated to the total
4 expense level.

5 One-time, unusual or non-recurring items were separately identified in workpaper
6 adjustments. This includes the removal of items that have a separate recovery
7 mechanism outside of the GRC. Please see the table below for the adjustments
8 that were made for Customer Information in SCG-12-WP.”

9 **6.1 ORA fails to appreciate the definition of “one-time, non-recurring and
10 unusual expenses.” The costs ORA has incorrectly identified as such are
11 necessary and required to operate the utility business.**

12 ORA defines “one-time, non-recurring and usual expenses” as expenses that do recur
13 year-to-year and are common business expenses that SoCalGas views as necessary and normal.

14 These expenses are identified by ORA in their response to SoCalGas’ data request as:

15 “ORA’s review and analysis of SCG’s 2009-2013 adjusted-recorded expenses
16 provided in SCG’s response to ORA-SCG-042-TLG, question 17 shows
17 significant expense fluctuations from year to year for several line items
18 demonstrating that the associated activities and related costs are not incurred at
19 that expense level on a yearly basis (i.e., one-time and non-recurring expenses).
20 **Note that expenses associated with employee meals, luncheons,
21 entertainment, gift cards, employee recognition, holiday events, various
22 corporate events, tickets to sporting events, certain employee/company dues
23 and memberships** (*emphasis added*), are a few examples of the type of expenses
24 SCG incurred between 2009-2013 that are not necessary or required to operate the
25 utility business. ORA did not remove these expenses from its estimate, which
26 provides SCG with embedded costs that can be reallocated in the TY for proposed
27 activities.”⁵³

28 The activities ORA has identified as one-time, non-recurring and unusual expenses, and
29 not necessary to operate are part and parcel of the regular ongoing activities of CS-I. These are
30 standard and reasonable business activities that include but are not limited to:

- 31 • Employee meals/luncheons: These include customary and reasonable meals when traveling
32 on business; working lunches during extended business meetings; and customer meetings
33 (which TURN has indicated are appropriate expenses⁵⁴).
- 34 • Gift cards, employee recognition, holiday events: Employee recognition expenses are used to
35 reward exemplary performance; motivate and retain high performing employees; and
36 encourage effectiveness and productivity.

⁵³ See Appendix G, ORA response to SoCalGas data request SEU-ORA-DR-02, A.1-a.

⁵⁴ Ex. TURN, Marcus, p.46.

- Customer Events/Catering: Expenses include meals and booth setups for seminars, conferences, workshops, community events that effectively and economically engage targeted customers.
- Business and Professional Dues: Provides access to exclusive material online resources, offers professional development opportunities, education, discounted seminars and publications, access to industry knowledge and topics.

These costs exist in every historical year as a reasonable business expense. See Table ADA-11 for a summary of these expenses. The line items from which the Table ADA-11 summary was totaled from is provided in detail in Appendix F. The activities ORA has identified do occur each and every year (spending levels vary year-to-year based on specific business needs).

TABLE ADA-11
Historical Expenses ORA Recommends Reallocation to SoCalGas TY Proposed Activities
(Constant 2013 \$s)

Workpaper	Workpaper Description	Cost Element Category	5-Year Average Total Summary
2IN001.000	CI-Commun & Research	Dues	\$741
2IN001.000	CI-Commun & Research	Employee Luncheons/ Employee Meals	\$16,428
2IN001.000	CI-Commun & Research	Employee Recognition / Events	\$3,324
2IN001.000	CI-Commun & Research	(Customer) Events	\$15,091
Customer Engagement & Insights Total			\$35,584

6.2 ORA’s assertion that costs can be reallocated from completed or eliminated projects to proposed TY activities is baseless.

ORA states:

“SCG can also reallocate costs from completed or eliminated projects to proposed TY activities.”⁵⁵

ORA’s assertion that costs can be reallocated from completed or eliminated projects to proposed TY activities is baseless. The costs that ORA claims can be eliminated will not support the new and expanded activities needed to meet customer expectations. SoCalGas does not have any completed or eliminated O&M projects from which costs can be reallocated. As I indicated

⁵⁵ Ex. ORA-13, p.89, line 2.

1 in my prepared direct testimony, the activities contained in the 5-year average reflect cyclical
2 fluctuations and recurring costs and do not include funding for one time or non-recurring
3 expenses.

4 In response to ORA's testimony, SoCalGas issued a data request for explanation on what
5 costs ORA recommends be reallocated to fund proposed TY activities. ORA responded they
6 were unable to determine which projects have been eliminated or completed based on SoCalGas'
7 not providing requested documentation. SoCalGas provided detailed information by 'Cost
8 Elements' from our Accounting System. The Cost Element is part of the code structure that
9 identifies the Company, Cost Center (lowest organizational level), and what is being charged
10 (Cost Element). Cost Elements are categories of costs, and are the lowest level of detail in our
11 database.

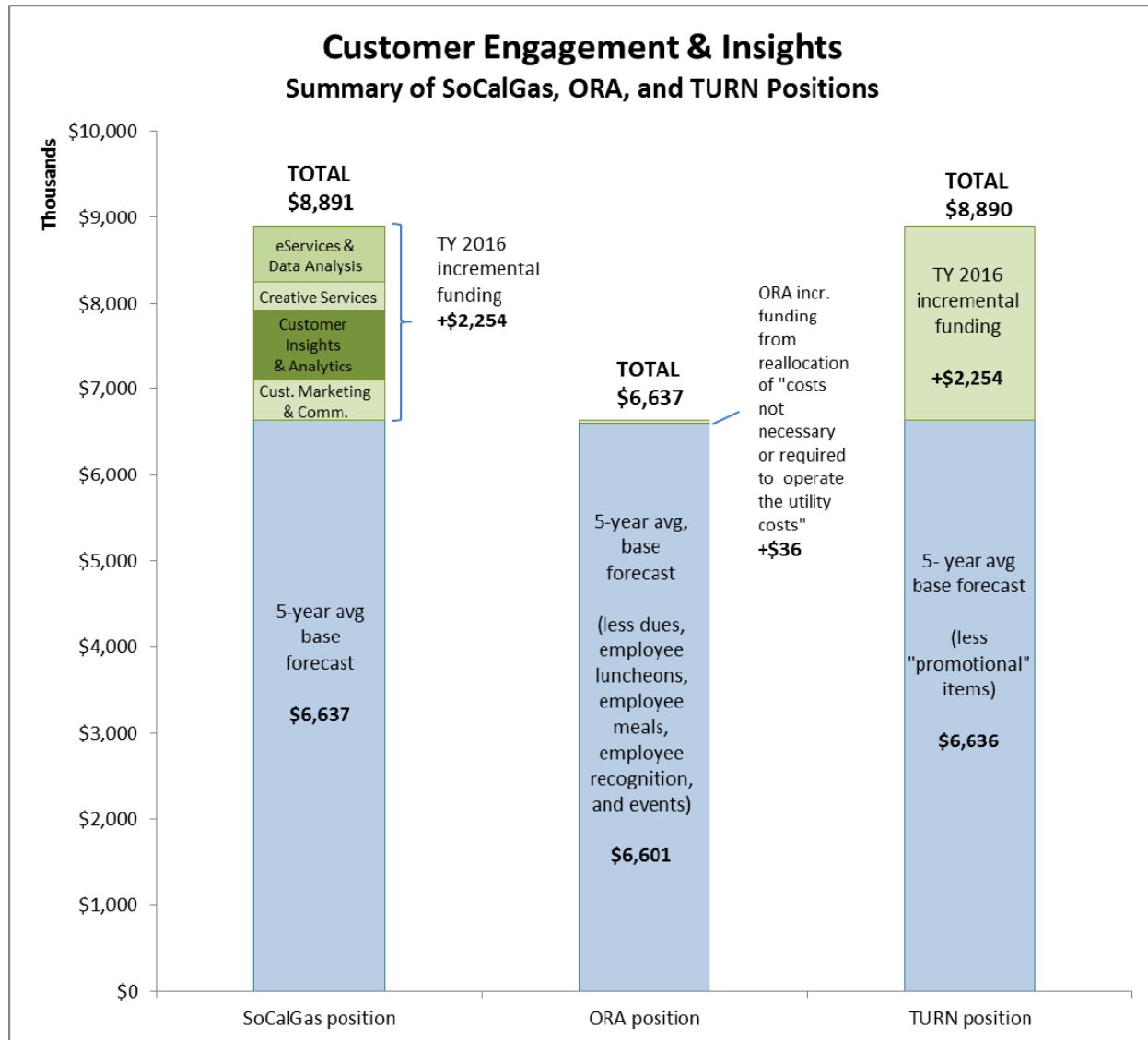
12 Moreover, there have been no standalone, or unique, completed or eliminated projects.
13 The fundamental activities are consistent and recurring; whether it be ad campaigns, video
14 production, web updates, accessibility compliance, or research projects. It is the content that
15 varies and changes. For example, videos could be created periodically, where in one year the
16 topic may be for "how to detect a gas leak"; a subsequent year may be for "how to identify
17 pipeline markers"; and another year may be for "proper maintenance of your natural gas
18 appliances", etc. Regardless, the activities involved in the creation, production, and development
19 of the video remain the same.

20 **6.3 Funding would be inadequate to support proposed TY activities with ORA's** 21 **recommendation of cost reallocation from existing activities.**

22 While ORA claims that SoCalGas can reallocate costs from base year 2013 one-time,
23 non-recurring activities and other expenses (as Figure ADA-3 illustrates) ORA's proposed
24 funding level is inadequate to support the incremental TY activities to serve customer needs.
25 SoCalGas forecasted TY incremental activities by identifying gaps in meeting customer needs
26 and expectations. Utilizing primary and secondary research, market trends and analysis,
27 incremental estimates for new activities were developed using current market data, and average
28 market reference range paybands. ORA's proposal to reallocate existing funds is insufficient and
29 should be rejected. ORA does not explain or demonstrate what or how a reallocation of base year
30 2013 recorded expenses can satisfy SoCalGas' proposed incremental expenses.
31

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Figure ADA-3
Bar Chart Comparison



3
4
5

7. SoCalGas’ proposal does not include goodwill, brand or corporate image advertising.

ORA’s concerns that SoCalGas’ historical expenses may include costs that should not have been charged 100% to ratepayers are unfounded.

ORA states:

“ORA has concerns that SCG’s historical expenses may include costs that should not have been charged 100% to ratepayers. SCG states ‘Outside of their interactions with utilities, customers are comparing their interactions with airlines, retailers, banks, and other industries with their utilities and that is starting to shape brand awareness, loyalty, expectations and experiences.²⁴⁰ ORA was not able to

1 determine if any of SCG's ad campaigns, media events, customer events,
2 marketing, etc., were incurred for good will advertising, brand or corporate image
3 building/enhancements, which should not be funded by ratepayers.

4 ²⁴⁰Ex. SCG-12, p. ADA-19"⁵⁶

5 ORA takes out of context, a single sentence in my prepared direct testimony where I state
6 that:

7 "Outside of their interactions with utilities, customers are comparing their
8 interactions with airlines, retailers, banks, and other industries with their utilities
9 and that is starting to shape brand awareness, loyalty, expectations and
10 experiences".⁵⁷

11 This sentence in my prepared direct testimony speaks towards customers' increased
12 expectations of how they expect to be serviced by their utilities in comparison with other
13 companies and industries. Customers expect to be able to transact across different service
14 channels. SoCalGas does not conduct, or seek funding to conduct brand awareness or loyalty
15 activities to be funded by ratepayers. The full paragraph is shown below and makes clear that
16 more and more customers are expecting to use social media when interacting with SoCalGas.

17 "With the expansion of online services offered by companies, there also has been
18 an increased expectation of how customers expect to be serviced. Outside of their
19 interactions with utilities, customers are comparing their interactions with airlines,
20 retailers, banks, and other industries with their utilities and that is starting to shape
21 brand awareness, loyalty, expectations and experiences.²² Our customers are used
22 to transacting across different service channels with their other service providers
23 and we need to ensure we are providing them with a similar experience. In a study
24 conducted in 2013, 83% of our customers said they would probably interact with
25 their utilities via social media."⁵⁸

26 Moreover, SoCalGas explicitly addresses ORA's concerns directly in data request
27 response ORA-SCG-042-TLG Q.17, where ORA requests:

28 "For SCG's CS-I for 2009-2013 provide, in a spreadsheet similar to the one
29 shown in workpapers on pages 333-334, a detailed and itemized listing of all
30 labor and on-labor expenses (note: do not lump expenses together in the response,
31 separate and identify the expenses by the categories as requested below) incurred
32 for 1) employee meals, 2) employee luncheons, 3) vendor payments for offsite
33 meetings and events (provide copies of contracts for costs and services provided),
34 4) all entertainment expenses, 5) employee recognition activities, 6) sporting
35 events, 7) bonuses/awards, 8) employee/company memberships and dues, 9) all

⁵⁶ Ex. ORA-13, p.88, line 15.

⁵⁷ Ex. SCG-12-R, p.ADA-19, line 3.

⁵⁸ Ex. SCG-12-R, p.ADA-19, lines 3 to 9.

1 contributions, 10) charitable events, 11) brand awareness and loyalty
2 surveys/campaigns/events, and 12) other employee reimbursable expenses.”

3 SoCalGas response:

4 “The expenses shown in the attachment “ORA-SCG-DR-042-TLG_Q17
5 Attachment.xlsx” reflect the dollars spent in 2009-2013 as charged by the
6 operating areas. The data shows that there is variation in categories used, which is
7 dependent upon the people responsible for assigning costs. All recorded costs are
8 included in the attachment. Not all categories requested by ORA are specifically
9 or separately identifiable. For example, sporting event related activities are not
10 separately identified from other employee reimbursable expenses. **Also,**
11 **SoCalGas does not explicitly conduct brand awareness or customer loyalty**
12 **campaigns.** SoCalGas does conduct customer surveys that measure customer
13 satisfaction, customer awareness and effectiveness of SoCalGas
14 communications.”

15 SoCalGas does not utilize ratepayer funds to promote brand advertising. Campaigns
16 funded in historical expenses are ongoing general safety and pipeline awareness campaign, and
17 winter messaging campaign. These are not campaigns for brand awareness or customer loyalty.

18 SoCalGas’ general safety campaign educates customers and the general public on critical
19 natural gas safety messaging such as how to identify gas leaks, what to do in the event of a gas
20 leak, call before you dig (pipeline safety), and appliance safety. Our winter messaging campaign
21 is strategically run during the “winter” timeframe to educate customers about energy
22 conservation; bill impacts due to increased usage; and to promote online tools to help customers
23 better manage their usage and bills during the winter season. Also included are seasonal safety
24 messages related to the safe and proper use of natural gas appliances and the dangers of carbon
25 monoxide (examples of these safety messages are attached in Appendix C).

26 The customer surveys that measure customer satisfaction, customer awareness and
27 effectiveness of SoCalGas programs, services and communications are for the purposes of
28 supporting ongoing improvements and enhancements and are not for brand awareness or loyalty
29 purposes.

30 As such, ORA’s recommendation (below) is baseless:

31 “In SCG’s next GRC, it should be required to specifically identify all activity and
32 associated costs related to ad campaigns, media events, customer events,
33 marketing, brand image goodwill/enhancements, etc. to ensure that ratepayers are
34 not being inappropriately charged for activities that should be recorded below the
35 line.”⁵⁹

⁵⁹ Ex. ORA-13, p.88, line 22.

1 SoCalGas has already provided ORA an itemized listing of all labor and non-labor
2 expenses for 2009-2013.⁶⁰ Clearly, ratepayer funds are not used for brand advertising. Any
3 additional level of detail above and beyond SoCalGas' response to ORA-SCG-042-TLG, Q.17
4 would require excessive manual tracking or expensive retooling of our accounting databases, for
5 which SoCalGas has not requested incremental funds.

6 **b. TURN**

7 TURN does not dispute SoCalGas' 5-year base forecast methodology with additional
8 incremental expenses for Customer Engagement & Insights.

9 **1. TURN's claim that historical expenses related to clothing and other gear are**
10 **promotional and should be removed from rates should be rejected.**

11 In testimony TURN states:

12 "SoCal Gas and SDG&E spent \$752,000 on clothing and other gear containing
13 the utilities' name and logo (excluding uniforms, hard hats, etc.) in base year
14 2013, as shown in TURN-Sempra DR 4-9. These types of expenses are largely
15 promotional and image-building (giveaways and other materials) and should not
16 be paid for by ratepayers. The tables below show that \$309,000 in expenses
17 should be removed from rates for SDG&E and \$443,000 for SoCal."⁶¹

18 Of the \$443,000 historical cost reduction TURN identifies,⁶² \$1,383 resides in the
19 Customer Engagement & Insights area of CS-I.⁶³ These types of expenses are not for image-
20 building or brand promotion. We provide promotional materials at conferences, seminars, and
21 community events to promote key messages such as safety, self-service, and energy
22 conservation.

23 **ii. Disputed Cost: Customer Assistance**

24 Table ADA-12 summarizes the impact of ORA and TURN's proposals on TY 2016
25 estimated expenses for Customer Assistance.

26

⁶⁰ See SoCalGas response to data request ORA-SCG-042-TLG, Q.17 in Appendix A, Attachment 7.

⁶¹ Ex. TURN, Marcus, p.47, Section V.D.

⁶² Ex. TURN, Marcus, p.48, Table 18.

⁶³ See Table ADA-3.

1 **TABLE ADA-12**

2 **Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses**

3 **Customer Assistance O&M Expenses**

	Base Year 2013	Test Year 2016	Change
Customer Assistance	2013 Constant (\$000)		
SoCalGas	\$2,834	\$4,253	\$1,419
ORA	\$2,834	\$3,196	\$362
TURN	\$2,830	\$4,249	\$1,419

4 **a. ORA**

5 ORA asserts that SoCalGas’ request for incremental funding for Customer Assistance is
 6 not justified, based on historical expenses from selective years (2011 to 2014).⁶⁴ ORA claims
 7 that SoCalGas’ adjusted-recorded expenses have been on a downward trend since 2011 and
 8 indicate that SoCalGas’ expenses declined by \$1.175 million between 2011 and 2014 from
 9 \$3.620 million in 2011 to \$2.445 million in 2014.⁶⁵ ORA ignores my prepared direct testimony
 10 (see Ex.SCG-12-R, p.ADA-16) which identifies significant external factors that will increase
 11 costs, including the pending 2015-2017 Low Income Energy Efficiency Decision (“LIEE”),⁶⁶ the
 12 anticipated upward cost pressures from contractors performing NGAT testing, and efforts to
 13 accelerate Medical Baseline enrollment.

14 **1. ORA recommends disallowance of incremental NGAT expenditures without**
 15 **consideration of SoCalGas’ cost factors forecast.**

16 SoCalGas filed the GRC application on November 14, 2014. The 2015-2017 LIEE
 17 application was filed on November 18, 2014. For purposes of the GRC, SoCalGas assumed
 18 118,000 homes would be treated⁶⁷.

19 In their testimony ORA states that:

20 “SCG’s TY 2016 forecast includes costs for activities (i.e., Medical Baseline
 21 Program, customer outreach, enrollment/application process, and education,

⁶⁴ Ex. ORA-13, p.90, line 9.

⁶⁵ Ex. ORA-13, p.90, line 10.

⁶⁶ An activity driven by a separate Commission Proceeding (LIEE Application), and for which the Commission mandated NGAT associated activities be charged to base rates rather than to the Public Purpose Program funds, per D.08-11-031, Ordering Paragraph 65 page 231.

⁶⁷ In the LIEE filing (A.14-11-011), SoCalGas reduced the home forecast to 110,000 homes (reduction of 8,000). If approved by the Commission this would reduce SoCalGas’ GRC NGAT incremental request by \$238,000 = (8,000 x 85% x \$35 = \$238,000)

1 Energy Savings Assistance Program, Natural Gas Appliance Testing, etc.)²⁴⁴ that
2 are routine and on-going and have costs embedded for the same or similar
3 activities²⁴⁵ in its historical expenses (2009-2014).

4 ORA formed its conclusion that the incremental line items are for activities which are
5 existing, and therefore should be disallowed. However, such a conclusion is erroneous and
6 overlooks the details provided in my prepared direct testimony, where I state that:

7 “The forecast method I chose for this cost category is a five-year historical
8 average with adjustment for specific program activities related to MBL and
9 NGAT. This method is most appropriate because the historical years of 2009-
10 2013 are reflective of costs that have been and continue to be core operational
11 program activities. Forecast adjustments for specific program activities includes:
12 additional costs for activity growth in MBL, and incremental NGAT costs for
13 activities that exceed the five-year historical average baseline, and are uniquely
14 influenced by home weatherization activities.”

15 In fact, the LIEE’s NGAT activity cost estimates are described in section “C. Customer
16 Assistance” category of my prepared direct testimony (p. ADA-30):

17 “The scope of this testimony’s Customer Assistance area covers costs for the
18 Special Needs customers and also for Energy Savings Assistance (“ESA”)
19 program carbon monoxide testing known as Natural Gas Appliance Testing
20 (“NGAT”).”⁶⁸

21 My prepared direct testimony clearly states that NGAT activity levels are determined in a
22 separate proceeding. The cost must be incurred and recovered in GRC base rates instead of
23 through the Public Purpose Program funds, as ordered by the Commission:

24 “According to the Commission, providing information to customers about
25 services in which they are likely to qualify is a utility cost to be allocated in
26 general rates.”⁵¹

27 ⁵¹D.08-11-031 Conclusion of Law 39 page 219.”⁶⁹

28 On page ADA-32 of my direct testimony, I have pointed out that in a previous decision
29 the Commission acknowledges that LIEE does drive the NGAT activity by their approval of a
30 one-time memorandum account to recover the incremental O&M costs incurred, to align with a
31 subsequent LIEE Decision.

32 “In the instance of the 2009-2011 ESA program cycle where the Commission
33 mandated a greater number of treated homes than forecasted in the associated

⁶⁸ Ex. SCG-12-R, p. ADA-30, line 16.

⁶⁹ Ex. SCG-12-R, p. ADA-30, line 20.

1 GRC cycle, the Commission approved a memorandum account to recover these
2 incremental costs to base rates.⁵⁴
3 ⁵⁴D.10-12-002.”⁷⁰

4 My direct testimony and restated in our response to data request ORA-SCG-042-TLG,
5 Q.20, established that the base 5-year average of NGAT historical expenses is a function of:

- 6 • Number of homes treated;
- 7 • Percentage (%) of ESA homes treated that also receive NGAT;
- 8 • Contractor cost per unit; and
- 9 • Costs of NGAT activity.

10 From this base 5-year average forecast, SoCalGas incorporated forecasts and assumptions
11 of NGAT cost elements for TY 2016 NGAT expenses.

12 ORA has cited my data request response to ORA-SCG-042-TLG, Q.20, as a reason for
13 ORA’s recommended disallowance for incremental NGAT expenditures in TY 2016. As stated
14 in my prepared direct testimony and in response to the data request, 2009-2013 NGAT expenses
15 average \$2,703,025/year. SoCalGas forecasted TY 2016 NGAT activity and estimated TY2016
16 requirements to be \$3,510,500. Therefore, SoCalGas requires an additional \$807,000 over the
17 base 5-year historical average (\$3,510,500 minus \$2,703,025) in TY 2016. As explained in my
18 prepared direct testimony these incremental expenses were developed from the following cost
19 factors:

- 20 • Align the number of homes treated in 2016 with the 2015-2017 LIEE Proceeding;⁷¹
- 21 • Assume 85% of ESA homes treated will receive NGAT; and
- 22 • Update the contractor cost per unit to align with TY 2016 market pricing indicators.

23 Consideration of these factors results in an incremental cost of \$807,000 above the 5-year
24 historical average base forecast.

25 **1.1 NGAT is subject to a separate CPUC Proceeding. SoCalGas’ proposal to align**
26 **the forecasted number of homes treated in 2016 with the final decision in the**
27 **2015-2017 LIEE proceeding is reasonable.**

28 SoCalGas filed the GRC application on November 14, 2014. The 2015-2017 LIEE
29 application was filed on November 18, 2014. For purposes of the GRC, SoCalGas assumed

⁷⁰ Ex. SCG-12-R, p. ADA-32, line 6.

⁷¹ Ex. SCG-12-R, p. ADA-34, line 14.

1 118,000 homes would be treated. In the LIEE filing (A.14-11-011), SoCalGas reduced the home
 2 forecast to 110,000 homes (reduction of 8,000). If approved by the Commission, this would
 3 reduce the GRC NGAT incremental request by \$238,000. SoCalGas recommends this
 4 calculation methodology (see below) to be applied to the final decision in the LIEE proceeding.

5 **Equation:**

6 TY 2016 Incremental NGAT expenses = (TY 2016 forecast NGAT cost) – (5 year average
 7 NGAT cost)

8 **Where ‘TY 2016 forecast NGAT cost’ equals:**

9 = (number of homes treated) x (85% ESA homes to receive NGAT) x (\$35/unit cost)

10 *where ‘number of homes treated’ will be determined by the final 2015-2017 LIEE
 11 Decision.

12 **Where ‘5 year average NGAT cost’ equals:**

13 = (sum of years 2009 through 2013 NGAT costs) ÷ 5 years

14 SoCalGas recommends the total incremental expenses over 5-year average be updated to
 15 reflect the final decision in the 2015-2017 LIEE proceeding.⁷² Table ADA-13, below,
 16 summarizes the incremental request for NGAT based on 118,000 homes treated assumption.

17 **TABLE ADA-13**
 18 **Incremental Expenses Summary: Natural Gas Appliance Testing**
 19 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Natural Gas Appliance Testing	n/a	\$807	NL: Incremental adjustment beyond base forecast to achieve Commission's mandate number of homes to be treated by 2020. (Based on assumption of 118,000 homes approved in 2015-2017 LIEE Decision)	\$807

20
⁷² SoCalGas’ incremental request for NGAT based on: 110,000 ESA homes treated, 85% of ESA homes receiving NGAT, and \$35/unit contract cost. The TY 2016 forecasted expenses of the Customer Assistance NGAT component results in: 110,000 x 85% x \$35 = \$3,272,500 total TY 2016 NGAT cost. The 5-year average historic cost of NGAT carved from the Customer Assistance total, amounts to: \$2,703,000. Subsequently, the incremental forecast from SoCalGas based on 110,000 LIEE treated homes becomes: \$3,272,500 - \$2,703,000 = \$569,500 incremental over the 5-year average base.

1 **2. ORA does not support enrollment growth for Medical Baseline eligible customers.**
2 **Latest study indicates 55% of eligible population is currently not enrolled. Current**
3 **funding levels are not adequate to increase penetration.**

4 ORA states that:

5 “SCG’s request for an increase of 50.07% over 2013 adjusted-recorded expenses
6 is not justified. SCG’s adjusted-recorded expenses have been on a downward
7 trend since 2011. SCG’s expenses declined by \$1.175 million between 2011 and
8 2014 from \$3.620 million in 2011 to \$2.445 million in 2014.”⁷³

9 ORA’s rationale is not specific to Medical Baseline activities, and disregards SoCalGas’
10 response to ORA’s data request ORA-SCG-DR-042-TLG, Q.20.g, where ORA requests:

11 “SCG states on page ADA-32 that ‘At the end of 2013, approximately 32,000
12 customers were enrolled in MBL [Medical Baseline].’ The 2010 report from
13 Athens Research estimates an MBL eligible population of approximately 71,000.
14 Provide documentation that explains in detail if during 2011-2013 SCG failed to
15 perform outreach, enrollment and application processing activities and failed to
16 coordinate with Community Based Organizations on MBL. If not, explain what
17 SCG has been doing to increase the MBL enrollment since reviewing the 2010
18 Athens Research study and considering that its recorded adjusted expenses have
19 declined between 2011-2013”.

20 SoCalGas’ response:

21 “The Medical Baseline (‘MBL’) program at SoCalGas only applies to customers
22 with space heating. As such, MBL outreach activities typically ramp up prior to
23 the winter season, and expenses are typically incurred at the 4th quarter of each
24 year. Subsequently, the timing of these charges have facilitated the appearance of
25 significant cost variances year-to-year when expenses have been mischarged at
26 the end of the year (such as December), and corrected the following month of a
27 new year (January).

28 An example of this would be the 2013 adjusted-recorded historical expenses for
29 Medical Baseline, which does not include an adjustment for an additional \$67,425
30 of Medical Baseline expenses that was mistakenly posted to the CARE Outreach
31 cost account (GRC excluded) by error in December 2013, but was corrected in
32 January 2014. In Ex, SCG-12-WP, Page 404 through 407, similar mischarges and
33 corrections have been indicated.

34 Average spending over the 5-year 2009-2013 historic period was \$159,000. The
35 2013 base year spend for MBL was above the 5-year historic period at \$165,000.
36 During 2011-2013 SoCalGas CS-I took the following steps to increase
37 participation in the MBL program:

⁷³ Ex. ORA-13, p.90, line 11.

- 1 • Twenty-one months out of the 36-month period, MBL was included in our
2 “For Your Information” Safety and Billing insert, and it was featured in an
3 article in our Gas Company News bill insert,
- 4 • Completed an MBL campaign targeting doctor’s offices,
- 5 • Participated in outreach events that targeted individuals with disabilities
6 such as the Southern California MS Walks, and participated in the
7 CHANGES program, and
- 8 • Produced a Customer Assistance video which included Medical Baseline.
9 The video was shown at presentations with Social Workers who could
10 share information about the program with their clients.”

11 These MBL incremental activities in 2013 are accounted for within SoCalGas’ 5-year
12 historic average base forecast. As stated in my prepared direct testimony,⁷⁴ these efforts by
13 SoCalGas Customer Assistance have resulted in an annual enrollment increase of 6.2% since
14 2010, and at the end of 2013, enrollment in MBL is at approximately 32,000.

15 According to the most recent study of SoCalGas’ Medical Baseline eligible population,⁷⁵
16 an enrollment of 32,000 is representative of approximately 45% of the total eligible population.
17 SoCalGas has proposed additional activities and associated costs over what has been performed
18 in 2013, in efforts to reach the remainder of the un-enrolled, yet eligible population. Specific
19 SoCalGas activities would include the following (which are new and additional activities to
20 support the existing MBL program):

- 21 • Additional training resources to provide more support than currently available for
22 coordinating with Community Based Organizations (“CBO”s) on MBL promotional efforts.
23 It is anticipated the additional support for CBOs will support bolstering enrollment. The
24 additional training will focus on educating CBOs regarding program eligibility requirements
25 and training CBOs on eligible conditions for MBL in order to assist customers in completing
26 the customer section of the application (to be communicated through local dialysis centers,
27 veteran hospitals, senior centers, and other health care facilities);
- 28 • Leveraging the CBO network to further promote MBL by targeting new enrollment channels
29 such as limited English proficient communities, among others that may be identified in the
30 updated eligible population study (discussed below);
- 31 • And developing educational and enrollment materials in multiple languages, and a higher
32 volume of communication materials to support multiple channels of delivery, including an

⁷⁴ Ex. SCG-12-R, p, ADA-36, line 19.

⁷⁵ Athens Research report, issued June 20, 2010, provides rough estimate of SoCalGas’ MBL eligible population to be approximately 71,000.

1 educational video, promotional handouts for community events, health fairs and expos, and
2 collateral material to provide for the use of CBOs.

3 One of the challenges of MBL enrollment is that customers cannot be asked directly
4 whether they or a member of their household has a disability. The two most prominent means for
5 MBL enrollment are visual identification by program staff as well as customer self-
6 identification.

7 In addition to the incremental outreach efforts, my prepared direct testimony proposes
8 incremental funding to update the 2010 Athens Research study to identify the MBL eligible
9 population information and to enhance the effectiveness of the proposed incremental MBL
10 outreach process.

11 These challenges, activities and justification are stated in my prepared direct testimony,⁷⁶
12 and data request responses to ORA-SCG-DR-042-TLG, Q.20.f and Q.20.g. In ORA data request
13 Q.20.f, ORA requests:

14 “Provide documentation that explains in detail how long SCG was aware that the
15 ‘Most recent study of SoCalGas’ Medical Baseline eligible population continues
16 to be from the 2010 report from Athens Research”.

17 SoCalGas response:

18 “SoCalGas’ Medical Baseline (‘MBL’), a subgroup of Customer Assistance, was
19 aware that the Athens Research study had limitations; however, at the time, it was
20 the primary source document utilized by the four Investor Owned Utilities
21 (‘IOUs’) to identify potential population for the MBL program. The structure of
22 the study as described by Athens Research, made minor use of statewide RASS
23 *2003* data. The study relied on data from Southern California Edison (‘SCE’).
24 The SCE data provided an aggregate/confidential historical frequency table that
25 illustrated the disease/condition percentage composition of MBL recipients. This
26 came from historical data when the utilities would capture such data but
27 eventually stopped storing disease condition electronically due to privacy issues;
28 the SCE data was used to identify the major players among MBL allocations, and
29 determine groupings of ailments to use in estimating a ratio adjustment to provide
30 rough eligibility or potential estimates. In addition, the SCE data was used to
31 work out ‘reasonable’ enrollment to population prevalence estimates to apply to
32 utilities.

33 The methodology utilized in the 2010 Athens Research Study has become
34 outdated and therefore, SoCalGas is requesting incremental funding for a new
35 study to ensure that SoCalGas can identify and enroll those customers who
36 qualify for the MBL program.”
37

⁷⁶ Ex. SCG-12-R, p. ADA-36 to ADA-37.

1 ORA recommends that incremental funding to increase outreach for MBL be denied.
 2 ORA simply ignores SoCalGas' direct testimony and responses to data requests and concludes
 3 that no additional resources are required to reach out to potentially eligible and needy MBL
 4 customers. Below, Table ADA-14 summarizes the incremental request for Medical Baseline
 5 expanded activities. These activities are not embedded in historical costs.

6 **TABLE ADA-14**
 7 **Incremental Expenses Summary: Medical Baseline**
 8 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Medical Baseline	n/a	\$250	NL: Incremental non-labor costs for efforts to accelerate enrollment of eligible customers of which \$230 will be for outreach and education, and \$20 will be for research and analysis per year.	\$250
Total Incremental Request	n/a	\$250		\$250

9 ORA's recommendation to disallow \$250,000 to increase medical baseline enrollment
 10 should be rejected.

11 **3. ORA does not appreciate the definition of "one-time, non-recurring and unusual**
 12 **expenses". The costs ORA has incorrectly identified as such are necessary and**
 13 **required to operate the utility business.**

14 As addressed in my rebuttal testimony, Section II.A.i.a.6.1, ORA defines "one-time, non-
 15 recurring and unusual expenses"⁷⁷ as expenses that do recur year-to-year and are common
 16 business expenses that SoCalGas views as necessary and effective. The activities ORA has
 17 identified as one-time, non-recurring and unusual expenses, and not necessary to operate are part
 18 and parcel of the regular ongoing activities of CS-I.⁷⁸ These costs exist in every historical year as
 19 a reasonable business expense.

20 See Table ADA-15 for a summary of these expenses. The activities ORA has identified
 21 do occur each and every year (spending levels vary year-to-year based on specific business

⁷⁷ See Appendix G, ORA response to data request SEU-ORA-DR-02, A.1.b.

⁷⁸ These cost element components are further discussed earlier in my rebuttal testimony, Section II.A.i.a.6.1.

needs). Particularly fundamental to the Customer Assistance area is the use of Customer Events to raise customer awareness and participation in the Medical Baseline program.

TABLE ADA-15⁷⁹

**Historical Expenses ORA Recommends Reallocation to SoCalGas TY Proposed Activities
(Constant 2013 \$s)**

Workpaper	Workpaper Description	Cost Element Category	5-Year Average Total Summary
2IN002.000	CI-Customer Assistance	Dues	\$8,532
2IN002.000	CI-Customer Assistance	Employee Luncheons/ Employee Meals	\$5,894
2IN002.000	CI-Customer Assistance	Employee Recognition / Events	\$1,501
2IN002.000	CI-Customer Assistance	(Customer) Events	\$23,969
Customer Assistance Total			\$39,897

4. Funding would be inadequate to support proposed TY activities with ORA’s recommendation of cost reallocation from existing activities.

While ORA does not disagree with the merits of SoCalGas’ proposed TY activities, it is clearly illustrated in Figure ADA-4 that ORA’s proposed funding level is inadequate to support the incremental TY activities to serve customer needs.

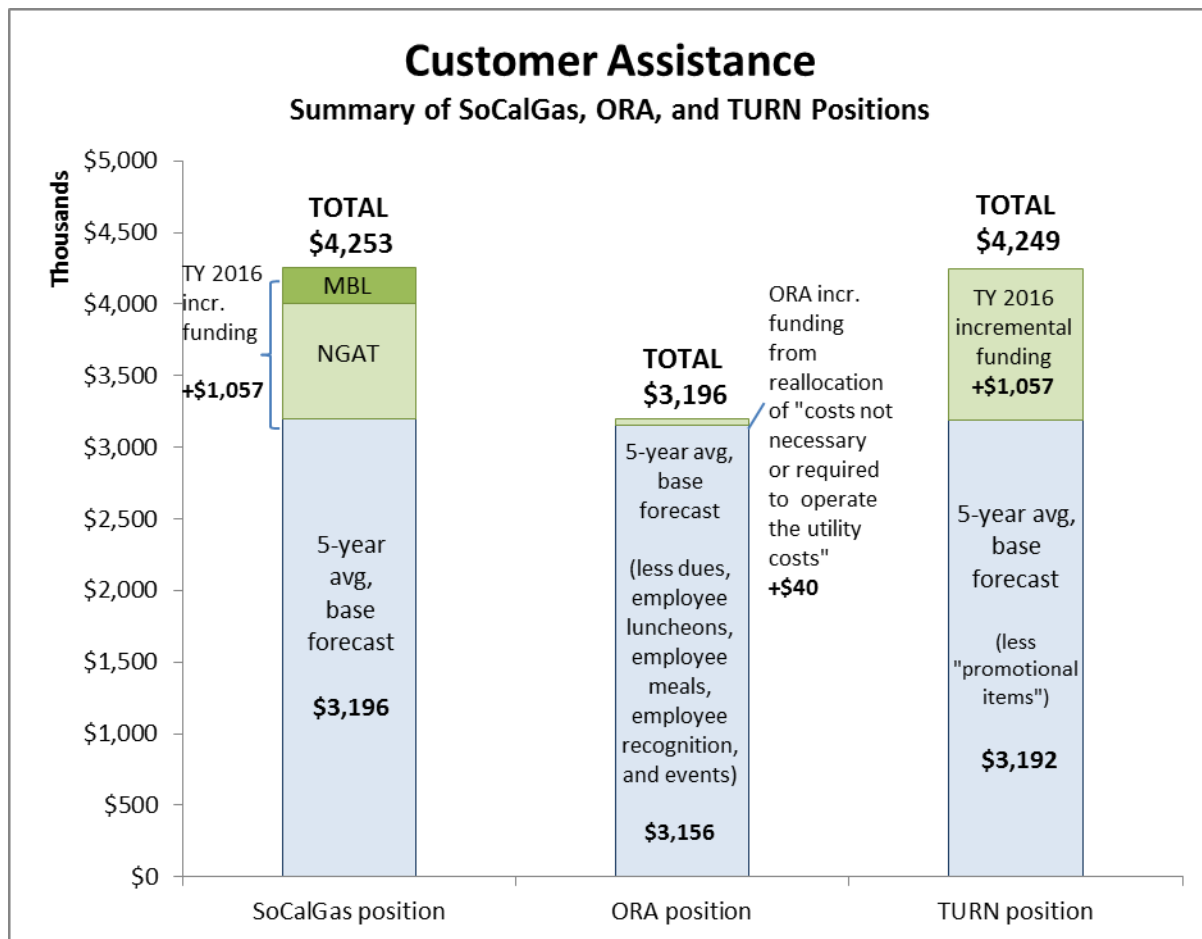
⁷⁹ The line items from which Table ADA-11 summary was totaled from is provided in detail in Appendix F.

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Figure ADA-4
Bar Chart Comparison



b. TURN

TURN does not dispute SoCalGas' 5-year base forecast methodology with additional incremental expenses for Customer Assistance.

1. TURN does dispute historical expenses related to clothing and other gear as promotional and requests that such costs be removed from rates.

TURN states:

“SoCal Gas and SDG&E spent \$752,000 on clothing and other gear containing the utilities’ name and logo (excluding uniforms, hard hats, etc.) in base year 2013, as shown in TURN-Sempra DR 4-9. These types of expenses are largely promotional and image-building (giveaways and other materials) and should not be paid for by ratepayers. The tables below show that \$309,000 in expenses should be removed from rates for SDG&E and \$443,000 for SoCal.”⁸⁰

⁸⁰ Ex. TURN, Marcus, p.47, Section V.D.

1 Of the \$443,000 historical costs TURN identifies for removal,⁸¹ \$3,835 resides in the
 2 Customer Assistance area of CS-I.⁸² These types of expenses are not for image-building or brand
 3 promotion. We provide promotional materials at conferences, and community events to promote
 4 key messages.

5 **iii. Disputed Cost: Customer Segment Markets**

6 Table ADA-16 summarizes the impact of ORA and TURN’s proposals on TY 2016
 7 estimated expenses for Customer Segment Markets.

8 **TABLE ADA-16**
 9 **Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses**
 10 **Customer Segment Markets O&M Expenses**
 11

	Base Year 2013	Test Year 2016	Change
Customer Segment Markets	Constant 2013 (\$000)		
<i>Energy Markets & Capacity Products</i>			
SoCalGas	\$1,801	\$2,078	\$277
ORA	\$1,801	\$2,078	\$277
TURN	\$1,801	\$2,078	\$277
<i>Segment Services</i>			
SoCalGas	\$6,519	\$9,413	\$2,894
ORA	\$6,519	\$7,171	\$652
TURN	\$6,403	\$9,297	\$2,894

12 **a. ORA**

13 ORA does not take issue with the 2016 forecast for Energy Markets. However, ORA does
 14 take issue with SoCalGas Customer Segment Markets TY 2016 O&M forecast. ORA
 15 recommends that SoCalGas’ incremental request for Customer Segment Markets of \$2.808
 16 million (labor and non-labor combined) over the 5-year average be reduced by \$2.242 million.⁸³
 17 Despite ORA acknowledging that the Segment Services’ adjusted-recorded expenses have
 18 remained relatively stable over the 5-year historic period,⁸⁴ ORA selectively recommends an
 19 alternative forecast methodology without basis. ORA’s proposal to use 2014 adjusted-recorded
 20 expenses as a forecast basis is inappropriate as the GRC forecast was developed according to the

⁸¹ Ex. TURN, Marcus, p.48, Table 18.

⁸² See Table ADA-3.

⁸³ Ex. ORA-13, p.92, line 19.

⁸⁴ Ex. ORA-13, p.93, line 12.

1 Rate Case Plan. The Rate Case Plan did not contemplate the use of 2014 recorded data. Although
2 this provides for some increase in funding over the 2013 basis, it is inadequate to meet the needs
3 of our customers.

4 ORA argues that costs embedded in historical expenses would be sufficient to fund
5 incremental TY 2016 activities and therefore recommends disallowance of most of the SoCalGas
6 request for incremental funding.

7 **1. ORA’s recommendation to deny additional funding to support proposals to enhance**
8 **proactive customer support and communication should be rejected.**

9 ORA states the following for Segment Services:

10 “SCG’s forecast includes costs for activities that have costs embedded in
11 historical expense and additional funding of 44.39% over 2013 adjusted-recorded
12 expenses is not required in the TY.”⁸⁵

13 “SCG’s responses demonstrate that it has been performing the activities that it
14 proposes in the TY and its historical expenses already include embedded costs for
15 the same or similar on-going activities. ORA’s estimate of \$7.171 million,
16 utilizing SCG’s 2014 adjusted-recorded expenses as a basis, is more than the five
17 year and six year averages, and captures SCG’s most recent activities for its
18 Segment Services and is a reasonable expense level for the TY.”⁸⁶

19 ORA’s rationale for disallowing Segment Services of \$2.242 million incremental funding
20 is misguided. ORA selectively ignores SoCalGas’ response to data request ORA-SCG-042-TLG,
21 Q.10, Q.11, Q.13, and Q.21, which clarifies the differences between existing core business
22 activities within Segment Services and the request for incremental funding attributed to new and
23 expanded activities.

24 In data request ORA-SCG-042-TLG, Q.15, ORA requests that SoCalGas:

25 “SCG states on page ADA-4, that ‘Subsequently, our activities have grown to
26 increase gas safety education and awareness to customers through a multitude of
27 communication channels and delivery methods, which include: one-on-one
28 customer engagement, outreach events, social media messaging, as well as
29 supporting increased natural gas appliance testing and CO testing.’
30 Provide documentation that explains in detail if SCG’s CS-I recorded adjusted
31 expenses or 2009-2013 include O&M costs associated with activities “to increase
32 gas safety education and awareness to customers through a multitude of
33 communication channels and delivery methods, which include: one-on-one

⁸⁵ Ex. ORA-13, p.93, line 9.

⁸⁶ Ex. ORA-13, p.95, line 12.

1 customer engagement, outreach events, social media messaging, as well as
2 supporting increased natural gas appliance testing and CO testing.”

3 SoCalGas responded to ORA as follows:

4 “Embedded within SoCalGas CS-I’s 2009-2013 core activities, includes increased
5 gas safety education and awareness to customers through a multitude of
6 communication channels and delivery methods. For example: Segment Services
7 Account Representatives have been provided Talking Points as a tool to help
8 foster increased dialogue with customers to educate on gas safety, Segment
9 Services Staff Support began to incorporate an informal gas safety dialogue in
10 annual Gas Market outlook presentations to local Association of Energy
11 Engineers and Inland Counties Water Association events, the Customer
12 Engagement & Insights’ Customer Marketing & Communication subgroup
13 extended their gas safety campaign from (historically) 3 weeks to nearly twice as
14 long (6 weeks), and Customer Segment markets added in mid-2013, a Residential
15 Market Services subgroup which has been tasked to focus on developing,
16 implementing, and continuously improving residential customer services which
17 includes improving communication strategies to promote gas safety, natural gas
18 appliance testing, and CO testing.”

19 ORA cited page ADA-5 of my prepared direct testimony, which is the Summary
20 Activities section of all areas encompassing Customer Information – Services.⁸⁷ As such,
21 SoCalGas’ response to ORA’s data request was provided under the general context of all
22 Customer Services-Information activities described. These increased activities from 2009-2013
23 do not fully address the unique needs of the Small/Medium Business, Residential, and Builder
24 specific customer segments as detailed in my prepared direct testimony.⁸⁸

25 In my prepared direct testimony, I identified specific incremental labor and non-labor
26 resources required to provide additional customer support to the customer segments.⁸⁹
27 Specifically, I identified the new regulations and mandatory emission standards imposed by air
28 quality districts with increasingly complex air quality regulations (such as SCAQMD Rule 1147,
29 Rule 1153, 1146, 1146.1, and Zero Net Energy mandates), and to targeted safety services and
30 education.

31 Moreover, certain core CS-I activities have increased.⁹⁰ This includes, but is not limited
32 to, the volume of customer communication messages; variety of customer communication
33 channels; Combined Heat and Power (“CHP”) technical support; safety messaging; and air

⁸⁷ See SoCalGas response to data request ORA-SCG-042-TLG, Q.15 in Appendix A, Attachment 6.

⁸⁸ Ex. SCG-12-R, ADA-55, “c. Cost Drivers”.

⁸⁹ Small/Medium Business, Residential, and Builder customer segments.

⁹⁰ See Appendix A.2:SoCalGas response to data request ORA-SCG-042-TLG, Q.9.

1 quality support. These activities were achieved during a time when recorded adjusted labor and
2 non-labor expenses have declined due to various drivers, which include (but are not limited to):

- 3 • Increased effectiveness from experienced FTEs;
- 4 • Improved training experiences to build experienced FTEs;
- 5 • Effective management of funding resources; and
- 6 • Leveraging partnership opportunities when possible.

7 All activities described in SoCalGas' response to ORA-SCG-042-TLG, Q.15 are existing
8 efforts included in the 5-year historical average base forecast in Segment Services (with the
9 exception of the Customer Marketing & Communication subgroup activity, which is represented
10 within the 5-year historical average of the Customer Engagement & Insights group). These
11 activities are not duplicative (but compliment) incremental items in my prepared direct testimony
12 for Segment Services.

13 These new activities also focus on providing proactive support to historically underserved
14 customer segments such as: the small/medium business customers, residential
15 seniors/landlords/renters, and builders. SoCalGas is proposing broader support for these
16 customer segments, which expands beyond general safety messaging and includes air quality
17 regulation support to respond to new regulations and expanded programs and services education.

18 ORA seems to misunderstand what is included in SoCalGas' historical expenses and
19 ORA recommends an insufficient level of funding to accomplish new and expanded incremental
20 Segment Services activities.

21 **1.1 ORA overlooks the “neglected middle” (Small/Medium Business) customer**
22 **segment.⁹¹**

23 ORA disregards SoCalGas' data request responses for questions specific to Segment
24 Services, which include ORA-SCG-042-TLG, Q21.f. These customer segments pose unique
25 challenges, and historically SoCalGas has underserved these customer segments.⁹²

26 ORA asked:⁹³

27 “Provide documentation that explains in detail if the same or similar activities as
28 the ones shown on page ADA-56 are currently being performed and related costs
29 incurred by CS-I FTEs (i.e., performing market research, preparing
30 communication and promotional materials, preparing educational and outreach

⁹¹ Ex. SCG-12-R, p. ADA-57, line 16.

⁹² Customer segments: Small/Medium Business, Residential/Renter/Landlord, Builder

⁹³ See SoCalGas response to data request ORA-SCG-042-TLG, Q.21.f. in Appendix A, Attachment 11.

1 materials associated with My Business, employee travel and other expenses,
2 development and implementation cost, etc.)”

3 SoCalGas responded:

4 “The 2009-2013 SoCalGas historical expenses do not include dedicated FTEs for
5 a Small/Medium Business Support Services subgroup. See Ex. SCG-12, Table 9,
6 ADA-39: currently there are dedicated Account Representatives (and other
7 Advisor and Project Manager roles) to support Energy Markets, Select Industry,
8 Geographically Assigned Commercial & Industrial Customers, and (as of mid-
9 2013) the growth of a dedicated subgroup of FTEs to support Residential, Home
10 Builders, and Developers. Geographically Assigned Commercial & Industrial
11 Customer Account Representatives support Small/Medium Business customers on
12 a reactionary basis. The Small/Medium Business Support Services incremental
13 request is to provide proactive support to this customer segment (see Ex. SCG-12,
14 Section II.D.2.c for further detail).”

15 ORA overlooks the “neglected middle” (Small/Medium Business) customer segment.⁹⁴ In
16 addition, ORA fails to recognize that the Residential/Renter/Landlord, Builders customer
17 segments have been underserved. SoCalGas’ customer engagement with these segments has
18 historically been minimal; customer interactions, services, and support are provided reactively or
19 not at all to these customers. SoCalGas’ 2009-2013 historical costs do not contain expenses for a
20 dedicated Small/Medium Business Support Services group to proactively support this customer
21 segment. The historical expenses supporting Small/Medium Business Support Services include
22 only:

- 23 • A minimal diversion of resources to provide Small/Medium Business customer support from
24 Account Representatives whose primary responsibilities are to serve Geographically
25 Assigned Commercial & Industrial (Large) Customers as required;
- 26 • Research conducted in 2013 by Segment Services Staff Support identified the needs of the
27 Small/Medium Business customer segment and provide recommendations to improve
28 customer engagement and support; and
- 29 • General facilities management and support at our Energy Resource Center located in
30 Downey to coordinate services and seminar offerings.

31 The Small/Medium Business customer segment is a large component of SoCalGas’
32 commercial and industrial customers, with approximately 210,000 active meters and is
33 representative of 41% of SoCalGas’ combined core and noncore nonresidential rate revenue.⁹⁵

⁹⁴ Ex. SCG-12-R, p. ADA-57, line 16.

⁹⁵ Ex. SCG-12-R, p. ADA-49, line 9.

1 The challenges of this customer segment compared to our large commercial and industrial
2 customers include:

- 3 • The sheer volume of customers (210,000 active Small/Medium Business meters, compared to
4 4,200 large/chain account meters);
- 5 • The various roles of an individual business owner (bill and energy usage management,
6 equipment permitting, emissions, and compliance issues);
- 7 • Language and cultural differences impacting ability to understand complex energy
8 information and regulations.

9 With approximately 210,000 active Small/Medium Business meters within our service
10 territory SoCalGas is requesting \$621,000 for 5 FTEs and Non Labor resources to provide
11 dedicated account support, address customer needs, provide targeted information to individuals
12 or groups and handle outreach education efforts. Small and medium businesses are significantly
13 impacted by regulatory and statutory compliance. California's regulatory environment is one of
14 the more costly and complex in the nation.

15 Small and medium businesses have been supported by modified residential service
16 channels and communications. Small and medium business owners/operators are frequently
17 called upon to perform in many capacities and are habitually too busy to make informed
18 decisions. They are frequently overwhelmed with information on energy usage, emissions, and
19 compliance issues, often turning to utilities for support and consultation when making significant
20 investments in process improvements or equipment. It is important to dedicate the appropriate
21 resources to provide the needed support and consultation in support of helping small and medium
22 businesses thrive and succeed.

23 In addition, ORA's disallowance is not in alignment with the Commission's Decision in
24 the Pacific Gas & Electric GRC 2014-2016.⁹⁶ The Commission's approval is recognition that this
25 customer segment is underserved.

26 Table ADA-17 summarizes the incremental request for Small/Medium Business Support
27 Services. These activities are not embedded in historical costs.

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⁹⁶ D.12-11-009, PG&E GRC 2014-2016.

1 **TABLE ADA-17**

2 **Incremental Expenses Summary: Small/Medium Business Support Services**

3 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Small/Medium Business Support Services	\$508	n/a	5 FTEs: 1 Business manager (\$124), and 4 Account representatives (4x\$96.4).	\$621
	n/a	\$113	NL: For market research, communication and promotional materials, travel and trade show expenses (\$63), and education and outreach material to support promotion of My Business portal (\$50).	

4 **1.2 ORA proposes to disallow funding to support programs to increase**
 5 **communications to vulnerable residential customer segments.**

6 With regard to proposed residential activities, ORA fails to fully recognize the needs of
 7 the sensitive and potentially vulnerable seniors citizens and renters living in SoCalGas’ service
 8 territory. The dynamically changing residential marketplace, aging population, and an increasing
 9 cost of living, can quickly impact individuals and their energy management.

10 By ignoring the incremental requests for services targeting seniors, ORA has potentially
 11 left behind a critical and growing population. Based on the 2010 Census data, seniors make up
 12 13% of the total population, which is the highest percentage taken over any prior census.⁹⁷ The
 13 Senior Services program requested in my direct testimony addresses the vulnerabilities through
 14 multiple communication vehicles and channels, with emphasis placed on managing safety in the
 15 home, supporting potentially diminishing physical abilities and creating a connected network to
 16 facilitate energy and bill related issues. The growing “many to one” networks where the primary
 17 customer is supported by a network of family members and caregivers will necessitate
 18 specialized communications.

19 A growing number of southern Californians reside in multi-family units and depend upon
 20 safe and reliable natural gas services provided through their landlords/property owners. As cited
 21 in my prepared direct testimony, the legal requirements in California drive mandated safety
 22 standards for utility and appliance connections. Incremental resources are needed to aid the
 23 efforts of renters, landlords and property owners to provide safe operations of gas appliances.

⁹⁷ See Appendix E: Werner, Carrie A. “The Older Population: 2010, 2010 Census Briefs”, United States Census Bureau, November 2011.

1 Funding for the incremental request (\$567,000) to support these additional activities in
2 the residential segment includes resources to conduct market research to understand the specific
3 needs and opinions and develop tailored communications (i.e., brochures, fact sheets, workshops,
4 web pages, etc.).

5 Moreover, with the consistent focus on customer safety and the specialized needs of the
6 elderly and landlords/renters, I have outlined in my prepared direct testimony the need for
7 incremental resources to support Sara Franke's testimony in the area of on-premise safety
8 checks.⁹⁸ A total of \$292,000 is required to develop direct mail and brochures to increase
9 customers' awareness and education on the state mandate for carbon monoxide detectors in the
10 home.

11 Table ADA-18, summarizes the incremental request Residential Market Services. These
12 activities are not embedded in historical costs.

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⁹⁸ Ex. SCG-12-R, p. ADA-6, pp. ADA-58 to ADA-59.

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TABLE ADA-18
Incremental Expenses Summary: Residential Market Services
(Thousands of 2013 dollars)

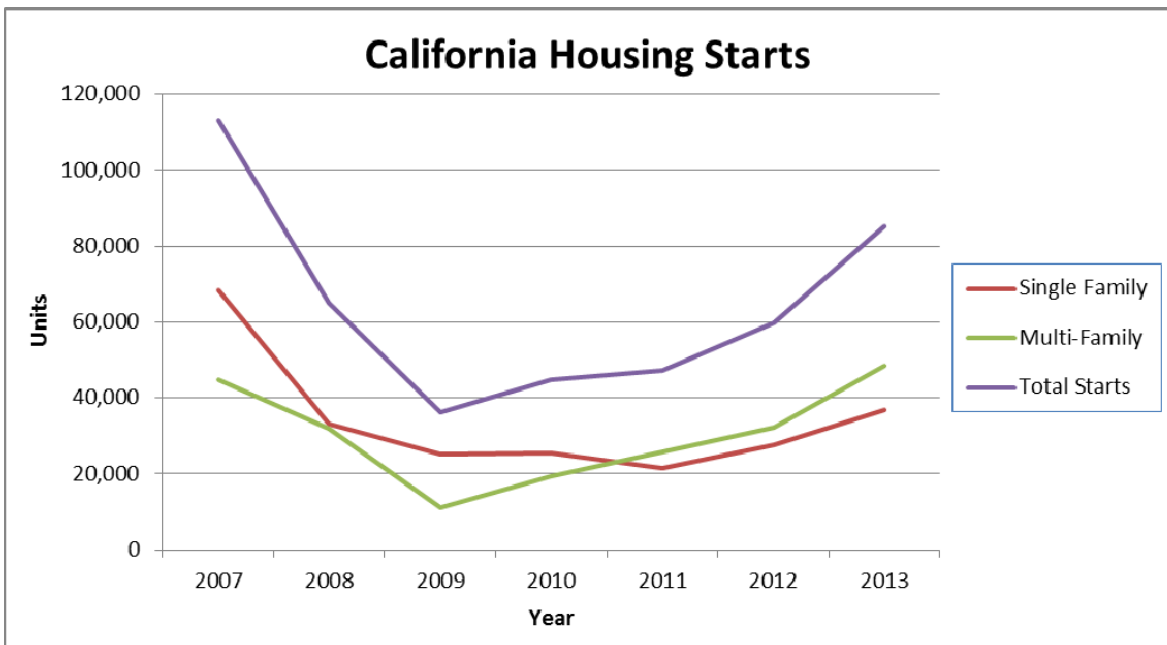
Program	Labor	Non-Labor	Explanation	Total
Residential Services (Residential Market Services)	\$217	n/a	2 FTEs: Residential Market Services - 2 Project managers (2x\$108.6)	\$567
	n/a	\$350	NL: Residential Market services - For contract labor, market research, web changes, communication and promotional materials	
	n/a	\$200	NL: Residential Market Services - For communication materials to support Customer Service Field safety check enhanced outreach and education.	\$292
	n/a	\$92	NL: Residential Market Services - For communication materials to support Customer Service Field CO detector and socialgas.com enhanced outreach and education.	

1.3. Tough California goals to reduce greenhouse gas emissions demands Builder Services resources.

New home construction in Southern California is increasing annually after reaching a low point in 2009. This post-recession resurgence in housing starts, combined with more exacting and stringent construction building codes, has placed a significant burden on builders, developers and contractors. This burden involves how builders manage their construction projects, manage their costs, and endeavor to meet state construction standards while meeting customer expectations.

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FIGURE ADA-5
2007-2013 California Housing Starts⁹⁹



California builders, developers and contractors are responding to the pent up demand for affordable housing in southern California by constructing more multi-family homes than single-family homes (see Figure ADA-5). Multi-family construction provides more affordable housing for southern Californian’s but is often more complex than single-family homes and will frequently incorporate larger shared infrastructure components. With this increased construction level, the increased level of regulation and complexity of multi-family construction, builders, developers and contractors need increased support to both increase affordable housing and meet state environmental goals.

The incremental expense of the Clean Energy Builder services will provide the operational analysis required to assist with the construction needed to meet the housing demands and provide the outreach, education, information and services to help with the housing crisis. Builders, developers and contractors build products that they believe will be marketable and profitable. Currently 72% of customers prefer natural gas as an energy source,¹⁰⁰ prompting builders, developers and contractors to incorporate natural gas solutions in their projects.

⁹⁹California Building Industry Association, “1954-2013 Historical Housing Starts”.
¹⁰⁰ SoCalGas, Customer Insight Study, Quarter 1 2015 Report – Residential.

1 With the increased reliance on Title 24 to help California realize our environmental goals,
 2 housing construction has now reached a higher level of technical complexity than ever, requiring
 3 the assimilation of precise safety information, installation information, and equipment selection
 4 during design and construction. Clean Energy Builder services will help builders, developers and
 5 contractors understand their clean energy options, ensuring they are aware of the higher
 6 efficiency and lower emission natural gas solutions. Below, Table ADA-19 summarizes the
 7 incremental request for Clean Energy Builder Services. These activities are not embedded in
 8 historical costs.

9 **TABLE ADA-19**
 10 **Incremental Expenses Summary: Clean Energy Builder Services**
 11 **(Thousands of 2013 dollars)**

Program	Labor	Non-Labor	Explanation	Total
Residential Services (Clean Energy Builder Services)	\$345	n/a	3 FTEs: Clean Energy Builder Services - 1 Project manager (\$108.2), 2 market advisors (\$192.8), and 2 interns at 0.5 FTE each (2x\$22)	\$685
	n/a	\$340	NL: Clean Energy Builder Services - For contract labor, market research, web changes, communication and promotional materials.	

12 **1.4. Combined Heat and Power technical resources support customers’ expanding**
 13 **needs and increasing environmental legislative goals.**

14 Combined heat and power (“CHP”) technical support provided by Segment Services is
 15 not a new activity, but it is an activity that is expanding in greater magnitude in order to further
 16 support and align with various and increasing legislative policy drivers. As detailed in my direct
 17 testimony,¹⁰¹ there are additional CHP resources/tools which Segment Services seeks to develop
 18 and provide to customers, additional legislative pressures to encourage CHP adoption, and an
 19 increased volume of customer interest (which requires additional SoCalGas resources to support)
 20 driving incremental expense forecasts. The additional resources required are itemized as 1.3
 21 FTEs and \$300,000 in non-labor expenses. The non-labor expenses are for the development of
 22 educational CHP technology literature to promote awareness, development of website landing

¹⁰¹ Ex. SCG-12-R, p. ADA-60, line 4.

1 pages, an online CHP technology evaluation tool, and CHP technology seminars. The additional
2 1.3 FTEs are in response to increasing volumes of customer requests for economic feasibility
3 analysis, technical support, and to develop and maintain outreach and educational material and
4 tools to promote CHP technology.

5 Environmental sustainability and climate change is a national and state concern, and CHP
6 technology plays an important role in supporting aggressive environmental policy goals, such as:
7 California Air Resource Board's ("CARB's") 2008 Assembly Bill ("AB") 32 scoping plan,
8 Governor Brown's Clean Energy Jobs Plan, AB1257 Natural Gas Strategy, and President
9 Obama's Presidential Executive Order (as summarized in my direct testimony).

10 Underscoring the importance and continued State focus on climate change, as recently as
11 April 29, 2015, Governor Brown has issued an executive order to establish California
12 greenhouse gas reduction target of 40 percent below 1990 levels by 2030 – the most aggressive
13 benchmark enacted by any government in North America to reduce dangerous carbon emissions
14 over the next decade and a half.¹⁰² The increasing labor and non-labor Segment Services
15 resources are required to further accelerate CHP technology adaption, which is a meaningful
16 response to supporting the aforementioned environmental goals.

17 Table ADA-20 summarizes the incremental request for Segment Services. These
18 activities are not embedded in historical costs.

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¹⁰² Executive Order B-30-15. "It is hereby ordered that: 1. A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050."

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TABLE ADA-20
Incremental Expenses Summary: Segment Services
(Thousands of 2013 dollars)

Program	Labor	Non-Labor	Explanation	Total
Segment Services	\$97	n/a	1.3 FTEs: 0.8 technical advisor (\$75), and 0.5 intern (\$22).	\$397
	n/a	\$300	NL: Development of Combined Heat and Power ("CHP") marketing tools, online self-CHP evaluation tool, technology and service brochures, technical seminars, and establishing industry presence at industry associations and conventions.	

2. ORA’s blanket recommendation of reallocating costs they identify as not necessary or required to operate the utility business is without merit.

The activities ORA has identified as one-time, non-recurring and unusual expenses, and not necessary to operate are part and parcel of the regular ongoing activities of CS-I (as addressed in my rebuttal testimony Section II.A.i.a.6.1). These are standard and reasonable business activities.

These costs exist in every historical year as a reasonable business expense. See Table ADA-21 for a summary of these expenses (further detail provided in Appendix F). The activities ORA has identified do occur each and every year (spending levels vary year-to-year based on specific business needs). As this business unit is our customer facing frontline, 3% of the overall organizational budget spent on customer events and meetings is more than reasonable.

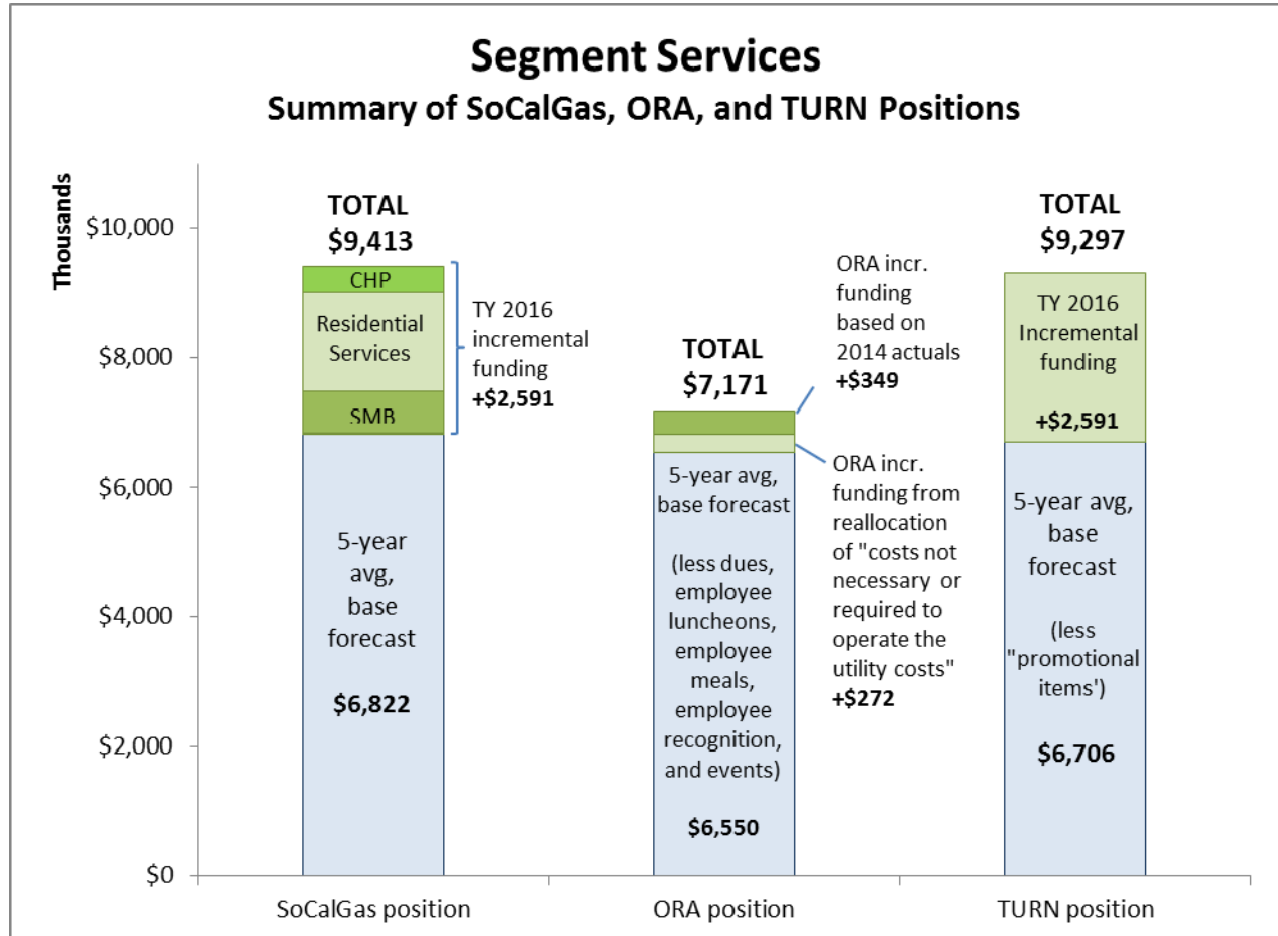
TABLE ADA-21
Historical Expenses ORA Recommends Reallocation to SoCalGas TY Proposed Activities
(Constant 2013 \$s)

Workpaper	Workpaper Description	Cost Element Category	5-Year Average Total Summary
2IN004.000	CI-Segment Services	Dues	\$25,108
2IN004.000	CI-Segment Services	Employee Luncheons/ Employee Meals	\$61,846
2IN004.000	CI-Segment Services	Employee Recognition / Events	\$7,852
2IN004.000	CI-Segment Services	Employee Meals	\$177,551
Segment Services Total			\$272,358

3. **Funding would be inadequate to support proposed TY activities with ORA's recommendation of cost reallocation from existing activities.**

While ORA does not disagree with the merits of SoCalGas' proposed TY activities, it is clearly illustrated in Figure ADA-6 that ORA's proposed funding level is inadequate to support the incremental TY activities to serve customer needs. SoCalGas developed incremental activities by identifying gaps in meeting customer needs and expectations. Utilizing primary and secondary research, market trends and analysis, new environmental, legislative and regulatory drivers, incremental estimates for new activities were developed using current market data, and average market reference range paybands. ORA's proposal is insufficient and should be rejected.

Figure ADA-6
Bar Chart Comparison



1 **b. TURN**

2 TURN does not dispute SoCalGas’ 5-year base forecast methodology with additional
3 incremental expenses TY 2016 forecast for both Energy Markets & Capacity Products and
4 Segment Services.

5 **1. TURN does dispute that historical expenses related to clothing and other gear are**
6 **promotional and states it should be removed from rates.**

7 TURN states:

8 “SoCal Gas and SDG&E spent \$752,000 on clothing and other gear containing
9 the utilities’ name and logo (excluding uniforms, hard hats, etc.) in base year
10 2013, as shown in TURN-Sempra DR 4-9. These types of expenses are largely
11 promotional and image-building (giveaways and other materials) and should not
12 be paid for by ratepayers. The tables below show that \$309,000 in expenses
13 should be removed from rates for SDG&E and \$443,000 for SoCal.”¹⁰³

14 Of the \$443,000 TURN identifies for removal,¹⁰⁴ \$63,261 resides in the Segment
15 Services area of CS-I.¹⁰⁵ These types of expenses are not for image-building or brand promotion.
16 To the contrary, SoCalGas provides promotional materials at conferences, seminars, and
17 community events to promote key messages such as safety, self-service, and energy
18 conservation.

19 **2. TURN’s claim that tickets to sporting and cultural events are costs that are not**
20 **necessary to provide utility service and should be rejected.**

21 TURN states:

22 “The Sempra utilities are spending \$165,000 on tickets to cultural and sporting
23 events. These costs are not necessary to provide utility service and should be
24 removed. Having good relationships with large customers and suppliers may
25 mean taking them to lunch; it should not mean taking them to the Staples
26 Center.”¹⁰⁶

27 Of the amount TURN identifies for SoCalGas to remove,¹⁰⁷ \$53,008 resides in the
28 Segment Services area of CS-I.¹⁰⁸ Use of sporting events and cultural tickets with customers is a
29 very common business practice across all industries to develop and maintain customer
30 relationships. These costs represent less than 3% of our total customer engagement meetings, and

¹⁰³ Ex. TURN, Marcus, p.47, Section V.D.

¹⁰⁴ Ex. TURN, Marcus, p.448, Table 18.

¹⁰⁵ See Table ADA-3.

¹⁰⁶ Ex. TURN, Marcus, p.46, Section V.C.

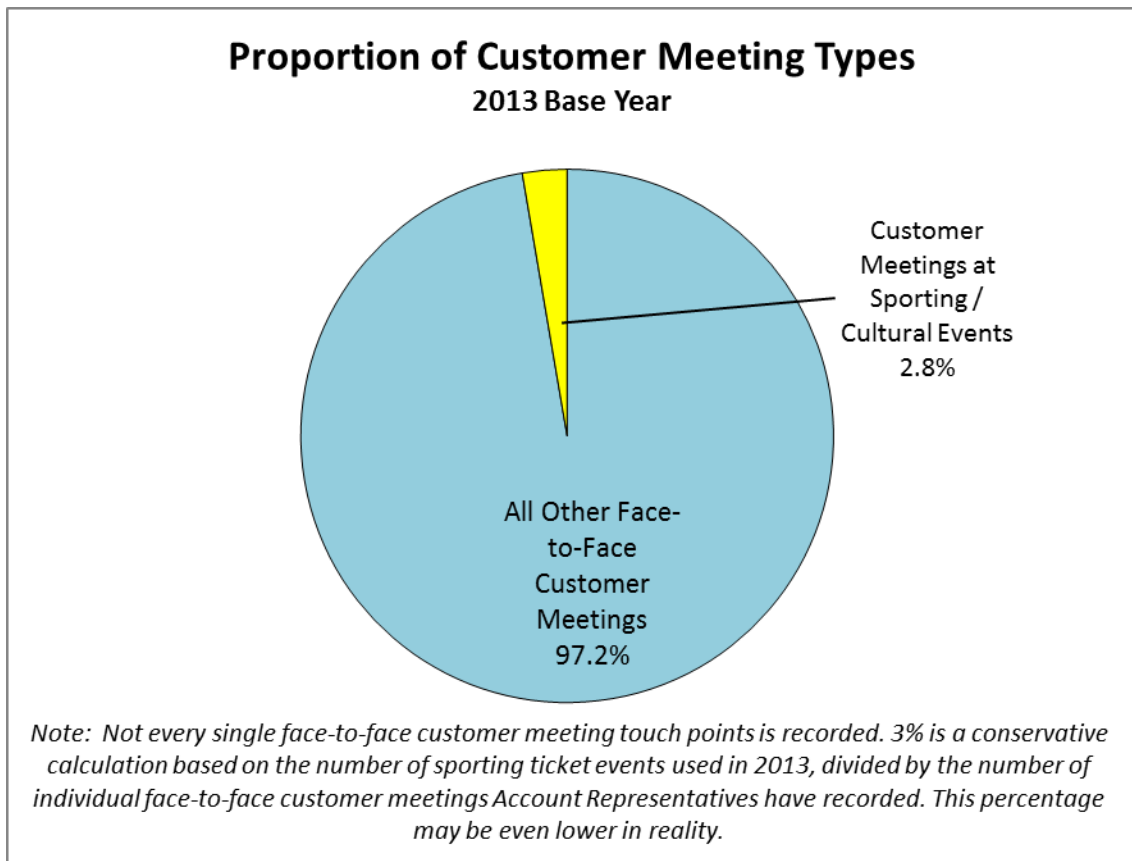
¹⁰⁷ Ex. TURN, Marcus, p. 46, Table 16.

¹⁰⁸ See Table ADA-2.

1 are reserved for specific, defined business purposes. Figure ADA-7 provides the full context of
2 the percentage of customer meetings Account Representatives have at sporting or cultural events
3 in comparison to all other face-to-face customer meeting types held in 2013. Conservative
4 estimates indicate SoCalGas' Account Representatives held over 4,000 face-to-face meetings
5 with customers in 2013, of which 113 meetings were held at a sporting/cultural event.

6 **FIGURE ADA-7**

7 **Percentage Pie Chart**



8
9 Meetings held at sporting /cultural events include discussions on regulatory changes, air
10 quality, compliance, tariffs, contracts, new business, emerging technology, emerging market, and
11 safety, and may include recognition for the customer's participation as: a technology
12 demonstration site, gas technology customer testimonial, or providing SoCalGas services
13 feedback. It is important to maintain a proactive presence with our commercial/industrial
14 customers as they represent a significant component of the customer base and help reduce the
15 cost to serve all customers. This benefits all ratepayers.

1 **B. Shared Services O&M**

2 **TABLE ADA-22**

3 **Comparison of SoCalGas, ORA, and TURN TY 2016 Estimated Expenses**

4 **CS-I Shared Service O&M Expenses Summary**

SHARED O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
SoCalGas	\$2,912	\$3,398	\$486
ORA	\$2,912	\$3,398	\$486
TURN	\$2,912	\$3,398	\$486

5 **i. Disputed Cost: Shared Services**

6 **a. ORA**

7 ORA does not take issue with SoCalGas' TY 2016 forecast for the Customer Service –
8 Information Shared Services work groups. Accordingly, SoCalGas recommends that the
9 Commission adopt the TY 2016 forecast for CS-I Shared Service of \$3.398 million as
10 reasonable.

11 **b. TURN**

12 TURN does not take issue with SoCalGas' TY 2016 forecast for the Customer Service –
13 Information Shared Services work groups. Accordingly, SoCalGas recommends the Commission
14 adopts the TY 2016 forecast of \$3.398 million as reasonable.

15 **III. REBUTTAL TO PARTIES' CAPITAL PROPOSALS**

16 **A. Capital Projects**

17 **i. ORA**

18 ORA states:

19 “2016. ORA does not take issue here with SDG&E's and SoCalGas' proposed
20 Customer Service capital projects, which are all Information Technology projects.
21 ORA's analysis and recommendations regarding the 2014 through 2016 capital
22 expenditures associated with such projects are presented in Exhibit ORA-15.”¹⁰⁹

23 ORA does not takes issue with Customer Service – Information capital projects business
24 justifications, however ORA does not recognize the requested incremental O&M resources to
25 support the ongoing operation and maintenance of the approved capital projects.¹¹⁰

¹⁰⁹ Ex. ORA-13, p.1, line 16.

¹¹⁰ Addressed in Section II.A.i.3.4.

1 **ii. TURN**

2 TURN does not take issue with SoCalGas' TY 2016 forecast for the Customer Service –
3 9 capital projects business justifications, nor does TURN take issue with the requested
4 incremental O&M resources to support the ongoing operation and maintenance of the capital
5 projects. Accordingly, SoCalGas recommends that the Commission adopt the TY 2016 forecast
6 of capital projects business justifications as reasonable.

7 **IV. CONCLUSION**

8 To summarize, CS-I shared-service, non-shared Energy Markets & Capacity Products,
9 and capital IT projects are uncontested by all parties. SoCalGas has addressed the proposed
10 disallowances presented by ORA, TURN and the Joint Minority Parties. ORA provides few facts
11 and analysis to justify their proposed disallowances, and used flawed, selective, and inconsistent
12 forecasting methodologies to derive their proposed reductions. TURN recommends
13 disallowances for reasonable business expenses.

14 ORA's and TURN's proposed disallowances for SoCalGas' TY 2016 estimated expenses
15 should be rejected. Contrary to the approach taken by ORA and TURN, SoCalGas' TY 2016
16 estimated expenses for CS-I have been documented in prepared direct testimony, workpapers,
17 rebuttal testimony and responses to data requests. Accordingly, SoCalGas' estimated expenses
18 for CS-I should be approved in full.

19 This concludes my prepared rebuttal testimony.

APPENDIX
TO REBUTTAL TESTIMONY
OF ANN D. AYRES
ON BEHALF OF SOCALGAS
CUSTOMER SERVICE – INFORMATION

APPENDIX ATTACHMENTS

A. Responses to Data Request ORA-SCG-DR-042-TLG

1. Question 1
2. Question 9
3. Question 10
4. Question 11
5. Question 13
6. Question 15
7. Question 17
8. Question 18
9. Question 19
10. Question 20
11. Question 21

B. Lee, Jessica. “Brands Expected to Respond Within an Hour on Twitter [Study]”, Search Engine Watch, November 1, 2013.

C. 2013 Safety and Winter Conservation Messaging Campaign Examples

D. National Consortium for the Study of Terrorism and Responses to Terrorism. “Social Media Use during Disasters”, December 12, 2012.

E. Werner, Carrie A. “The Older Population: 2010, 2011 Census Briefs”, United States Census Bureau, November 2011.

F. Detailed list of items and totals from 2009-2013 that ORA has identified as not necessary or required to operate the utility business.

G. ORA response to SoCalGas data request SEU-ORA-DR-02.

ATTACHMENT A.1
ORA-SCG-DR-042-TLG, Q1

**ORA DATA REQUEST
ORA-SCG-DR-042-TLG
SOCALGAS 2016 GRC – A.14-11-004
SOCALGAS RESPONSE
DATE RECEIVED: JANUARY 21, 2015
DATE RESPONDED: FEBRUARY 5, 2015**

Exhibit Reference: SCG-12

Subject: Customer Service - Information

Please provide the following:

1. SCG forecasts \$28.033 million (\$24.625 million for Non-Shared, and \$3.398 million for Shared Services) for Test Year 2016 for its Customer Service - Information Operations and Maintenance (O&M) expenses. This is an increase of \$8.048 million or 40.27% (a 44.29% increase for Non-Shared and 16.69% increase for Shared Services) over 2013 recorded adjusted expenses of \$19.985 million. The five year average (2009-2013) is \$21.612 million and the three year average (2011-2013) is \$21.145 million.
 - a. SCG states on page ADA-3 that “Generally, my Test Year forecasts are reasonable because they account for cyclical fluctuations and recurring costs attributed to core business functions.” SCG’s CS-I O&M expenses have declined each year between 2010 and 2013 (see SCG-12-WP page 333). The highest recorded expenses of \$24.143 million were in 2010. Provide documentation that explains specifically what SCG means by “cyclical fluctuations and recurring costs” as it relates to recorded adjusted expenses for 2009-2013.
 - b. SCG states on page ADA-3 that “TY 2016 estimated O&M expenses adopted a consistent 5-year average forecast methodology to form a “baseline” forecast for all areas within CS-I.” Provide documentation that will clarify ORA’s understanding of SCG’s “baseline forecast”, using SCG’s Customer Engagement & Insights expenses as an example. Provide documentation that explains if ORA’s understanding is correct that SCG’s “baseline forecast”, utilized prior to calculating an increase of 33.96% for proposed incremental TY costs, for Customer Engagement & Insights, provides SCG with an increase of 12.13% over 2013 recorded adjusted expenses (\$33.186 million/5 years = \$6.637 million - \$5.919 million = \$0.718 million/\$5.919 million =12.13% increase over 2013 recorded adjusted expenses).
 - c. SCG states on page ADA-3 “This forecasting methodology reduces anomalies in the forecast by smoothing costs attributed to abnormal operating conditions, compliance with new mandates or regulations, employee attrition, and cost fluctuations.” Provide documentation that explains if SCG’s statement above in this question refers to the five year average (2009-2013)/“baseline forecast.”
 - d. Provide documentation that explains if SCG’s forecast 2016 expenses could have “costs attributed to abnormal operating conditions, compliance with new mandates or regulations, employee attrition, and cost fluctuations,” similar to recorded costs for 2009-2013. If SCG does not believe that its forecast 2016 costs will incur “costs attributed to abnormal operating conditions, compliance with new mandates or regulations, employee attrition, and cost fluctuations...”, state so.

ORA DATA REQUEST
ORA-SCG-DR-042-TLG
SOCALGAS 2016 GRC – A.14-11-004
SOCALGAS RESPONSE
DATE RECEIVED: JANUARY 21, 2015
DATE RESPONDED: FEBRUARY 5, 2015

Question 1 (Continued)

- e. For SCG's CS-I, 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 333-334.
- f. For SCG's CS-I, provide the recorded 2014 capital expenditures for all projects listed in Table 18 on page ADA-71.
- g. SCG forecasts labor expenses of \$14.252 million for its CS-I which is \$3.118 million or 28% over 2013 recorded adjusted labor expenses of \$11.134 million. SCG's forecast includes incremental funding for 31.9 additional FTE positions in TY 2016 (see page 431 in workpapers). SCG's labor expenses have declined by \$0.996 million between 2010 and 2013 (see SCG-12-WP page 333-334) from \$12.130 million in 2010 to \$11.134 million in 2013. The five year average (2009-2013) of recorded adjusted labor expenses is \$11.726 million.

SCG forecasts non-labor expenses of \$13.779 million for its CS-I which is \$4.930 million or 55.71% over 2013 recorded adjusted non-labor expenses of \$8.849 million. SCG's non-labor expenses have declined by \$3.164 million between 2010 and 2013 (see SCG-12-WP page 333-334) from \$12.013 million in 2010 to \$8.849 million in 2013. The five year average (2009-2013) of recorded adjusted non labor expenses is \$9.886 million.

- i. Provide documentation that explains in detail if SCG's CS-I has failed to comply with any Commission directives, federal directives and regulatory decisions during 2009-2013.
- ii. Provide documentation that explains in detail all fines and penalties SCG's CS-I received for failure to comply with any Commission directives, federal directives and regulatory decisions during 2009-2013.
- iii. Provide documentation that explains in detail and demonstrates any declines in SCG's CS-I customer service, communication, experience, and satisfaction levels between 2009-2013.
- iv. Provide documentation that explains in detail if SCG's CS-I has deferred any required/mandated projects, programs or other activities associated with gas safety education and awareness to customers, outreach and training programs/events (i.e., medical baseline, community based organizations, gas assistance fund), social media messaging, natural gas appliance testing/carbon monoxide testing, maintenance of socialgas.com website, My Account and other e-Channels (including Web Content Accessibility Guidelines), etc.) during 2009-2013 to justify 31.9 additional FTE's and an increase of 55.71% in non-labor expenses.
- v. If projects, programs or other activities were deferred during 2009-2013, identify the projects and associated costs and state the cause of the deferral.

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Question 1 (Continued)

- vi. Provide documentation that explains if SCG requested and was authorized funding in its 2012 GRC (D.13-05-010) for any of the deferred projects identified in question g-iv and g-v.
- vii. Provide documentation that explains if SCG's 2016 CS-I GRC request includes projects that it also requested and received funding for in its 2012 GRC (D.13-05-010), if so, identify the projects and associated costs.

SoCalGas Response:

ORA Question 1 misstates the SoCalGas non-shared service TY2016 request as \$24.625 million. Table 1 in Ex. SCG-12 on page ADA-1 shows that figure to be \$24.635 million.

- a. SoCalGas does not agree that all of CS-I's O&M expenses have declined each year between 2010 and 2013. The following workpapers do not demonstrate a decline each year between 2010 and 2013 for the CS-I workpapers/cost centers:
 - 2IN002.000 Customer Assistance
 - 2IN003.000 Energy Markets & Capacity Products
 - 2200-0246.000 Energy Markets & Capacity Products Director
 - 2200-0328.000 Capacity Products Support
 - 2200-2158.000 Gas Scheduling
 - 2200-2329.000 Gas Transmission Planning

SoCalGas acknowledges that in the adjusted-recorded expenses between 2010 and 2013, the following workpapers/cost centers have demonstrated a decline:

- 2IN001.000 Customer Engagement & Insights
- 2IN004.000 Segment Services
- 2200-0330.000 Capacity Products Staff
- 2200-2282.000 VP Customer Solution

CS-I expense declines in the above workpapers/cost centers do not imply, nor should it be inferred, that base year spending levels for CS-I are sufficient to maintain and fund existing core business functions with recurring expenses and cyclical fluctuations that may not be reflected in the single base adjusted recorded expenses. The cyclical expenses occur in any of years in the 2009-2013 period and not necessarily be included in base year adjusted recorded expenses.

Examples of cyclical fluctuations and recurring costs as it relates to recorded adjusted expenses for 2009-2013 include (but are not limited to):

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SoCalGas Response (Continued)

- Website/intranet refreshes occur every 3-5 years based on drivers which can include: changes in customer needs for information and services, changes in web browser behavior/features/security, improve customer experience. *(Activity mostly not included in 2013. Majority of 2013 consisted of accessibility updates).*
- Photo and media licenses depend on how agreements are made with photographers/videographers, our licenses can expire approximately every 3 years, which then require replacement to replenish our media library for producing communication content. *(2013 base year was an average renewal activity year).*
- Large research studies vary and refresh every 2-5 years for various activities such as: a 2010 study to test the effectiveness of onserts versus inserts in mailings, ‘Voice of Customer’ comprehensive customer needs/perception assessment, crisis communications, secondary research vendor subscriptions. *(Many of these activities were not reflected in 2013 base year).*
- The timing of booked expenses for marketing/campaign invoices also fluctuates. See SoCalGas response to question 20.g for an example regarding the Medical Baseline expense recording disparity. *(December 2013 costs did not reflect until 2014).*
- Natural Gas Appliance Testing (NGAT) is driven by the home weatherization activities that SoCalGas performs for the Energy Savings Assistance (ESA) Program. This program has established goals based on a separate proceeding that directly impacts the volume of NGAT activity. The proceeding has cycles that are not aligned with SoCalGas’ GRC cycles, i.e., 2009-2011, 2012-2014, 2015-2017.
- Non-shared Energy Markets & Capacity Products FTE activity vary based on needs to provide regulatory support, operational support, train and advise Account Representatives, implementation of new mandates, intermittent core business activities (examples: Omnibus, Backbone Transportation Service, California Producer Access Proceeding, curtailments). *(California Producer Access, Biogas Producer Access, Southern California Edison’s Local Capacity Requirement Request For Offer evaluations activity was not reflected in 2013).*
- Account management support fluctuates due to new customer business activity, biennial non-core contract renewals, capacity bidding seasons, Backbone Transportation Service.
- Seasonal summer injection/winter withdrawal patterns that impact customer demand for services regularly vary.
- Shared-service Energy Markets & Capacity Products fluctuate due to long-term customer and supplier relationships.
- External training seminars vary based on necessity, topic, vendors, and attendance.

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SoCalGas Response (Continued)

- Employee membership dues, licensing/certification renewals, subscription renewals typically occur every 1-3 years.

Some of these types of fluctuations have also generally been demonstrated in Ex.SCG-12-WP Pages 400-426, and can also be found summarized in SoCalGas' response to question 17 in this data request response, including invoice examples in SoCalGas' response to question 8, and are also described in testimony Ex.SCG-12, Section I, Section II.B.2, Section II.C.2, Section II.D.1.b., Section II.D.2.b., Section III.B.2., and Section III.C.2.

- b. In the example of Customer Engagement & Insights, the 5-year historical average (2009-2013) base forecast totals \$6.637 million. In comparison, the 2013 base year adjusted-recorded expenses for Customer Engagement & Insights were \$5.919 million. CS-I concurs that in this example, the base forecast CS-I utilized represents a 12.13% increase over 2013 adjusted-recorded expenses ($(\$6.637 - \$5.919) / \$5.919 = 12.13\%$).

CS-I proposes TY 2016 costs for Customer Engagement & Insights to be \$8.891 million to support incremental activities beyond the 5-year historical base forecast. In this example, CS-I concurs that it represents a 33.96% increase over the 5-year historical average ($(\$8.891 - \$6.637) / \$6.637 = 33.96\%$).

Please see attachment "ORA-SCG-DR-042-TLG_Q1b Attachment.xlsx" for further comparison of CS-I's base forecast, 2013 base year adjust-recorded expenses, and TY 2016 forecast.

- c. Yes, the statement above refers to the use of five-year historical average (2009-2013) as a baseline forecast.
- d. Yes, SoCalGas CS-I's base forecast of 2016 expenses is built on a 5-year (2009-2013) historic average, which reflects historical occurrences of costs from 2009-2013 considered to be attributed to abnormal operating conditions, non-recurring costs for compliance with new mandates or regulations, employee attrition, and cost fluctuations. The 5-year historical average assumes that SCG will continue to have abnormal and unpredictable operating conditions, continuing compliance activities, employee attrition and cyclical expenses.
- e. SoCalGas anticipates that its 2014 labor and non-labor adjusted-recorded expenses will be served to ORA in March 2015. The SCG CS-I 2014 labor and non-labor adjusted-recorded expenses will be provided in the same manner as shown in workpapers page 333-334 at that time.

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SoCalGas Response (Continued)

f. SoCalGas anticipates that its 2014 adjusted-recorded capital expenditures will be served to ORA in March 2015. The SCG CS-I 2014 adjusted-recorded capital expenditures for all projects listed in Table 18 on page ADA-71 will be provided at that time.

g.

i. SoCalGas CS-I did not fail to comply with any Commission directives, federal directives and regulatory decisions during 2009-2013.

ii. SoCalGas has no fines and/or penalties for any failures to comply with any Commission directives, federal directives and regulatory decisions during 2009-2013.

iii. Within the CS-I scope and context of the Customer Insights & Analytics subgroup, there are no demonstrated declines in customer service, communication, experience, and satisfaction levels to internal stakeholders. SoCalGas's CS-I activities includes the Customer Insights & Analytics subgroup, which manages all primary and secondary customer research to monitor customer satisfaction and experience, as described in Ex.SCG-12, Section II.B.1., "Customer Insights & Analytics". Many CS-I supported research/data analysis projects measures customer service, communication, experience, and satisfaction for activities outside of the CS-I scope. ~~However,~~ ~~within~~

A study administered by CS-I's Customer Insights & Analytics subgroup, and contains some relevance to the customer service, communication, experience and satisfaction levels of CS-I activity of the Account Management subgroup would be the "2009 Major Markets Customer Survey", which then transitioned into the "Major Markets Tracking Study" for the years 2010-2013 SoCalGas's CS-I activities also includes the Segment Services workgroup, which includes customer facing interactions via the Account Representatives, as described in Ex.SCG-12, Section II.D.2., "Account Management" subgroup..

CS-I's Customer Insights & Analytics subgroup also administers the Major Markets Tracking Study, which assesses the attitudes of business customers towards SoCalGas on:

- Overall performance,

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SoCalGas Response (Continued)

- Evaluation of SoCalGas programs and services,
- Account Executive/AE (also known as Account Representative/AR) awareness, satisfaction and interactions,
- Business-related programs, services and issues, and
- Energy-related issues.

Results of the study include, but are not limited to:

Favorability ratings, (which demonstrated a 1-2% difference year-to-year) were considered by Travis Research to be “consistently high”:

Year	2010	2011	2012	2013
Rating	79%	80%	78%	77%

And Satisfaction marks for their Account Representative, which demonstrated a 1-2% improvement from years 2011-2013:

Year	2010	2011	2012	2013
Rating	82%	82%	84%	85%

Please find the following attachments for the complete studies of:

- 2009 SCG CI Major Markets Survey,
 “ORA-SCG-DR-042-TLG_Q1giii-2009 Attachment.pdf”
- 2010 Major Markets SCG Report,
 “ORA-SCG-DR-042-TLG_Q1giii-2010 Attachment.pdf”
- 2011 Major Markets SCG Report,
 “ORA-SCG-DR-042-TLG_Q1giii-2011 Attachment.pdf”
- 2012 Major Markets SCG Report,
 “ORA-SCG-DR-042-TLG_Q1giii-2012 Attachment.pdf”
- 2013 Major Markets SCG Report,
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SoCalGas Response (Continued)

- iv. SoCalGas CS-I requests an incremental 26.3 additional FTEs for expanded incremental activities, and an additional 5.6 FTEs over the 2013 base year to support existing core activities using a 5-year historical average base forecast, which totals to 31.9 additional FTEs for TY 2016 over 2013 base year. SoCalGas CS-I also requests 39.36% increase over 5-year historic base forecast (or 55.71% increase over 2013 base year forecast) in non-labor expenses. These labor and non-labor expenses are to support various activities that may consist of increased existing core activities or incremental new activities (please see Ex.SCG-12, ADA-iii to ADA-v), and activities that are required/mandated or activities that are not required/mandated within CS-I. The supporting documentation providing background and cost drivers of these incremental activities are detailed in the testimony, Ex.SCG-12, under the “Cost Drivers” for each workgroup (Customer Engagement & Insights, Customer Assistance, etc.) subsection. Also, a guiding roadmap is provided that associates each funding request with corresponding testimony and workpaper areas. The detailed breakdown is located in SoCalGas’s response to ORA Deficiency SCG-ORA-DEF-028-TLG-SCG-12, located in the Ex.SCG-12-WP-APP, pages 427 to 431 of 433.

Within the scope of SoCalGas’ CS-I activities (specifically related to Ex.SCG-12, Section II.B.1. “eServices & Data Analysis”), SoCalGas deferred one provision of the Memorandum of Understanding between SoCalGas and the Center for Accessible Technology (“CforAT Settlement”), which concerned Web Content Accessibility Guidelines. According to the Joint Motion for Adoption of Settlement A.10-12-005 submitted February 24, 2012, IV.A.2.d. “Accessibility of Third Party Vendor Software”, paragraph 3:

“Within 24 months of the Effective Date, the third party vendor software used for My Account will be rewritten to utilize accessible web pages that are compliant with Priorities A and AA and produce PDF documents that will be in an accessible format that would allow for a reader to review them using a screen reader.”

SoCalGas disclosed in the “Memorandum of Understanding Annual Report for year 2013” that compliance for PDF bills shown in My Account was still in progress and that it is anticipated that new accessible versions would be available in December of 2015. This date is past the 24 month timeframe in the MOU, but has been approved by the Center for Accessible Technology. This deferred activity does not contribute to the TY2016 incremental request and is considered a core, base activity.

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SoCalGas Response (Continued)

- v. Gas Scheduling advisor activities related to the California Producers Decision were deferred from 2009-2013 due to a delay in Commission approval that did not occur until February 11, 2014 via Advice Letter 4177-A. The California Producers Capital IT project was also deferred due to a delayed Commission ruling (Note: California Producers Capital IT project will be removed from TY2016 Capital request in the Errata filing).
- vi. SoCalGas requested and D.13-05-010 authorized SoCalGas 1 incremental FTE to support Gas Scheduling activities related to the California Producers Decision. In addition, SoCalGas also requested and D.13-05-010 authorized incremental costs for SoCalGas' California Producers Capital IT project.
- vii. SoCalGas CS-I's 2016 GRC request includes 1 incremental FTE that was approved in 2012 GRC to support Gas Scheduling advisor activities related to the California Producers Decision, which was approved on February 11, 2014 in AL 4177-A.

ATTACHMENT A.2
ORA-SCG-DR-042-TLG, Q9

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9. Provide documentation that explains if SCG’s CS-I activities have been increasing between 2009 and 2013, and if so, state specifically how SCG has been able to meet its required work responsibilities during a time when its recorded adjusted labor and non-labor expenses have declined.

SoCalGas Response 09:

Certain core CS-I activities have increased, which include, but is not limited to, the volume of customer communication messages, variety of customer communication channels, Segment Services combined heat and power (“CHP”) technical support, safety messaging, Medical Baseline enrollment, and air quality support. These activities were achieved during a time when recorded adjusted labor and non-labor expenses have declined due to various drivers, which include (but are not limited to):

- Increased effectiveness from experienced FTEs,
- Improved training experiences to build experienced FTEs,
- Effective management of funding resources,
- Leveraging partnership opportunities when possible,

Also to note, timing of expenses when booked (See SoCalGas response to question 20.g. as an example) may contribute to misrepresenting 2013 base year costs as abnormally low.

ATTACHMENT A.3
ORA-SCG-DR-042-TLG, Q10

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10. Provide documentation that explains in detail and demonstrates why the current funding levels of SCG's CS-I are insufficient to meet proposed TY projects and activities.

SoCalGas Response 10:

SoCalGas CS-I's 2013 base year funding levels are insufficient to perform the activities proposed for Test Year 2016. The activities in CS-I fluctuate year-to-year, driven by cyclical fluctuations, abnormal operating conditions, employee attrition, cost fluctuations, as further elaborated on in SoCalGas response to question 1.a. and stated in the testimony Ex.SCG-12 "Forecast Method". Furthermore, CS-I identifies incremental new or expanded existing activities in TY 2016 which require additional funding based on considerations such as identified in SCG-12, ADA-3:

- Increasing diversity of SoCalGas' customer segments;
- Customer information technology adoption, dynamic and expanding communication e-channels leading to increased customer expectations;
- Heightened community interest with respect to gas safety;
- Expanded special needs, hard-to-reach customer outreach efforts to ensure all customers are uniformly served;
- Enhanced technical engineering services and support; and
- Expanded and more complex state and federal energy, air quality, policy and regulatory environment.

ATTACHMENT A.4
ORA-SCG-DR-042-TLG, Q11

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11. Provide documentation that explains in detail why utilizing a straight five year average method to forecast proposed TY 2016 activities for SCG's CS-I, which captures recurring, on-going and routine costs and fluctuations in expenses from year to year, is insufficient considering the decline in labor and non-labor expenses between 2010 and 2013.

SoCalGas Response 11:

Using a straight five-year historic average method is a reasonable methodology to model core existing activities, as SoCalGas CS-I has proposed in testimony and also elaborates further on in response to question 1.a and 1.b. However, in forecasting TY 2016 activities, CS-I must also account for new mandated activities and additional requirement because of

- Increasing diversity of SoCalGas' customer segments;
- Growing customer information technology adoption, dynamic and expanding communication e-channels leading to increased customer expectations;
- Heightened community interest with respect to gas safety;
- Expanded special needs, hard-to-reach customer outreach efforts to ensure all customers are uniformly served;
- Enhanced technical engineering services and support; and
- Expanded and more complex state and federal energy, air quality, policy and regulatory environment.

ATTACHMENT A.5
ORA-SCG-DR-042-TLG, Q13

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13. 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 13:

SoCalGas CS-I's 2013 base year staffing levels are insufficient to perform the activities proposed for Test Year 2016. The activities in CS-I fluctuate year-to-year, driven by cyclical fluctuations, abnormal operating conditions, employee attrition, cost fluctuations, as further elaborated on in SoCalGas response to question 1.a and stated in the testimony Ex.SCG-12 "Forecast Method". Furthermore, CS-I identifies incremental new or expanded existing activities that require incremental staff in TY 2016 based on considerations such as identified in SCG-12, ADA-3:

- Increasing diversity of SoCalGas' customer segments;
- Customer information technology adoption, dynamic and expanding communication e-channels leading to increased customer expectations;
- Heightened community interest with respect to gas safety;
- Expanded special needs, hard-to-reach customer outreach efforts to ensure all customers are uniformly served;
- Enhanced technical engineering services and support; and
- Expanded and more complex state and federal energy, air quality, policy and regulatory environment.

ATTACHMENT A.6
ORA-SCG-DR-042-TLG, Q15

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15. SCG states on page ADA-4, that “Subsequently, our activities have grown to increase gas safety education and awareness to customers through a multitude of communication channels and delivery methods, which include: one-on-one customer engagement, outreach events, social media messaging, as well as supporting increased natural gas appliance testing and CO testing.”

Provide documentation that explains in detail if SCG’s CS-I recorded adjusted expenses for 2009-2013 include O&M costs associated with activities “to increase gas safety education and awareness to customers through a multitude of communication channels and delivery methods, which include: one-on-one customer engagement, outreach events, social media messaging, as well as supporting increased natural gas appliance testing and CO testing.”

SoCalGas Response 15:

Embedded within SoCalGas CS-I’s 2009-2013 core activities, includes increased gas safety education and awareness to customers through a multitude of communication channels and delivery methods. For example: Segment Services Account Representatives have been provided Talking Points as a tool to help foster increased dialogue with customers to educate on gas safety, Segment Services Staff Support began to incorporate an informal gas safety dialogue in annual Gas Market Outlook presentations at local Association of Energy Engineers and Inland Counties Water Association events, the Customer Engagement & Insights’ Customer Marketing & Communication subgroup extended their gas safety campaign from (historically) 3 weeks to nearly twice as long (6 weeks), and Customer Segment Markets added in mid-2013, a Residential Market Services subgroup which has been tasked to focus on developing, implementing, and continuously improving residential customer services which includes improving communication strategies to promote gas safety, natural gas appliance testing, and CO testing.

ATTACHMENT A.7
ORA-SCG-DR-042-TLG, Q17

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17. For SCG's CS-I for 2009-2013 provide, in a spreadsheet similar to the one shown in workpapers on pages 333-334, 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 17:

The expenses shown in the attachment "ORA-SCG-DR-042-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, sporting event related activities are not separately identified from other employee reimbursable expenses. Also, SoCalGas does not explicitly conduct brand awareness or customer loyalty campaigns. SoCalGas does conduct customer surveys that measure customer satisfaction, customer awareness and effectiveness of SoCalGas communications.

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Attachment for ORA-SCG-DR-042-TLG, Question 17
Exhibit Reference: SCG-12 Customer Service - Information

					Fiscal year	2009	2010	2011	2012	2013
TOTAL O&M (NSS+USS)						\$20,481,373	\$24,138,964	\$22,193,945	\$21,262,545	\$19,984,607
NON-SHARED Total						\$17,408,214	\$20,778,140	\$19,041,976	\$18,276,544	\$17,073,126
Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$975,342	\$1,499,585	\$1,422,462	\$1,304,223	\$1,258,797
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$104,495	\$95,592	\$91,684	\$98,069	\$57,118
2IN001.000	CI-Commun & Research	Labor	Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$256	\$392	(\$20)	\$70	\$0
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$0	\$0	\$25,496	\$0	\$0
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$23,057	\$3,846
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$9,487	\$39,778	\$0	\$0
2IN001.000	CI-Commun & Research	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$458	\$0
2IN001.000	CI-Commun & Research	Labor	Other Labor	6110256	SAL-MISC	\$1,077	\$0	\$1,081	\$300	\$1,039
2IN001.000	CI-Commun & Research	Labor	Other Labor	6110270	SAL-SEVERENCE	\$0	\$22,922	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Labor	Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$4,835	\$2,618	\$0	\$2,000
2IN001.000	CI-Commun & Research	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$0	\$0	\$0	\$15	\$0
2IN001.000	CI-Commun & Research	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$184,526	\$278,292	\$262,657	\$228,333	\$219,849
2IN001.000	CI-Commun & Research	Labor	Labor	Labor	TOTAL LABOR	\$1,265,696	\$1,911,105	\$1,845,755	\$1,654,526	\$1,542,649
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6120075	EMP BEN-RANDOM TEST	\$0	\$101	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$0	\$0	\$58
2IN001.000	CI-Commun & Research	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$4,713	\$1,805	\$1,237	\$1,928	\$425
2IN001.000	CI-Commun & Research	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$23	\$40
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6130000	EMP BEN-EXPENSES	\$0	\$0	\$3,829	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$4,504	\$9,352	\$9,462	\$8,833	\$7,482
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$204	\$327	\$144	\$64	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$86	\$813	\$3,500	\$1,887	\$2,308
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$127	\$391	\$352	\$126	\$115
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$21,954	\$16,777	\$8,418	\$11,789	\$8,847
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$0	\$0	\$27	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$319	\$1,249	\$1,275	\$885	\$724
2IN001.000	CI-Commun & Research	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$5,580	\$6,646	\$3,922	\$4,110	\$2,270
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$244	\$250	\$339	\$468	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$410	\$1,076	\$1,072	\$1,201	\$840
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$13,471	\$18,384	\$12,575	\$14,374	\$17,189
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$325	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$0	\$1,195	\$415	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6130040	EMP OTH-LIVNG EXP-IM	\$0	\$0	\$9	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$443	\$657	\$614	\$424	\$249
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6210000	PURCHASED MATERIALS	\$0	\$1,246	\$0	\$0	\$163
2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$61	\$76	\$45	\$84	\$101
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$1,558	\$0	\$152	\$1,538
2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$5,691	\$10,794	\$5,190	\$4,206	\$8,423

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2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$275	\$473	\$1,309	\$765
2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$43	\$745	\$80	\$60	\$60
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$1,214	\$42	\$202	\$2,590
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$3,369	\$120,491	\$11,220	\$18,077	\$11,370
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$879	\$3,090	\$11,236	\$1,447	\$844
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$30,682	\$0	\$234,624	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$50	\$0	\$0	\$154
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$2,757	\$172	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$432	\$814	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$1,838	\$12,337	\$2,350	\$5,003	\$9,299
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$93	\$324	\$89
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$0	\$63,801	\$29,362	\$25,605	\$9,240
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$1,408	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6213680	MATL-CUSTOMER EVENT	\$0	\$81,059	\$169	\$0	\$148
2IN001.000	CI-Commun & Research	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$0	\$2	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220000	PURCHASED SERVICES	\$0	\$346,729	(\$68,423)	\$42,927	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$64,209	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$0	\$0	\$0	\$509	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKMTG	\$2,085,136	\$2,433,457	\$2,027,890	\$1,795,735	\$1,794,239
2IN001.000	CI-Commun & Research	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$1,339,439	\$1,696,955	\$1,878,652	\$1,380,736	\$1,605,243
2IN001.000	CI-Commun & Research	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$6,787	\$6,821	\$12,567	\$11,076	\$13,768
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$0	\$0	\$127,866	(\$11,169)	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$3,642	\$0	\$6,106	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220115	SRV-OUTDOOR ADVERTIS	\$0	\$0	\$6,239	\$5,910	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$40,182	\$81	\$23,122	\$23,880
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$765	\$3,319	\$267	\$1,831	\$3,784
2IN001.000	CI-Commun & Research	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$143,377	\$143,484	\$95,857	\$126,653	\$148,231
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$663,953	\$412,198	\$437,256	\$299,274	\$372,858
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$76	\$546	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220392	SRV-GRAPHICS IN-HSE	\$0	\$0	\$234	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$366	\$31	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220421	SRV-COPY-ENGINEERING	\$5	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$317	\$3,739	\$2,341	\$1,936	\$5,991
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$137	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$0	\$27,018	\$5,679	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220432	SRV-MAIL-O'NIGHT EXP	\$0	\$0	\$0	\$13	(\$13)
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$108	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$65,840	(\$25,996)	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$26,317	\$300	\$227,947	\$122,154	\$53,147
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$5,105	\$29,573	\$12,613	\$8,794	\$4,306
2IN001.000	CI-Commun & Research	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$783,656	\$99,148	\$292,207	\$217,887
2IN001.000	CI-Commun & Research	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$5,144	\$28,756	\$17,194	\$19,787	\$2,887
2IN001.000	CI-Commun & Research	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$0	\$0	\$5,215	\$54,968	\$148
2IN001.000	CI-Commun & Research	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$14,949	\$0	\$0

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2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220920	SRV-SAFETY RELATED	\$55	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6220930	SRV-ENRGY EFFICIENCY	\$0	\$1,215	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$0	\$0	\$0	\$438
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6221010	SRV-STORAGE	\$0	\$0	\$0	\$0	\$405
2IN001.000	CI-Commun & Research	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$674	\$3,286	\$59,254	\$3,599
2IN001.000	CI-Commun & Research	Non-Labor	Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$18,644	\$0	\$4,048
2IN001.000	CI-Commun & Research	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$1,163	\$1,924	\$254	\$457	\$822
2IN001.000	CI-Commun & Research	Non-Labor	Office/Furn Supplies	6230460	SRV-BILL POSTAGE	\$0	\$0	\$0	\$10	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$94	\$2,220	\$65	\$2,457
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6230554	SRV-RECRUITING WEB	\$0	\$0	\$515	\$0	\$225
2IN001.000	CI-Commun & Research	Non-Labor	Employee Related	6230555	SRV-RECRUITING ADV	\$0	\$518	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$12,928	\$18,562	\$4,149	\$9,558	\$9,307
2IN001.000	CI-Commun & Research	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$177	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6230810	SRV-CONSUMER ED	\$0	\$0	\$0	\$212	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Purchased Services	6230830	SRV-LANGUAGE SRVS	\$0	\$0	\$26,819	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Dues	6250000	Dues	\$0	\$0	\$0	\$0	\$250
2IN001.000	CI-Commun & Research	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$229	\$1,125	\$563	\$1,286	\$250
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$287	\$367	\$467	\$180
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$0	\$2,806	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$10,661	\$18,533	\$20,928	\$20,398	\$23,153
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$3	\$5	\$28	\$28
2IN001.000	CI-Commun & Research	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$98	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	(\$5,274)	(\$1,559)	(\$955)	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Misc NL Costs	6350742	MISC CHARGES	\$25,061	\$0	\$0	\$0	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Misc NL Costs	6405000	A&G-MISC GENERAL EXP	\$0	\$0	\$0	(\$0)	\$0
2IN001.000	CI-Commun & Research	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$4,385,774	\$6,461,076	\$5,127,213	\$4,612,324	\$4,376,846
2IN001.000	CI-Commun & Research	TOTAL		TOTAL ALL		\$5,651,470	\$8,372,182	\$6,972,968	\$6,266,850	\$5,919,496
2IN002.000	CI-Customer Assistance	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$79,433	\$101,663	\$102,750	\$83,178	\$85,438
2IN002.000	CI-Customer Assistance	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$8,190	\$4,701	\$4,640	\$3,519	\$2,774
2IN002.000	CI-Customer Assistance	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$47,515	\$49,972	\$49,672	\$50,702	\$49,598
2IN002.000	CI-Customer Assistance	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$5,989	\$979	\$4,911	\$4,216	\$5,229
2IN002.000	CI-Customer Assistance	Labor	Other Labor	6110256	SAL-MISC	\$0	\$0	\$0	\$12,525	\$2,759
2IN002.000	CI-Customer Assistance	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$25,501	\$27,499	\$26,904	\$24,678	\$24,232
2IN002.000	CI-Customer Assistance	Labor	Labor	Labor	TOTAL LABOR	\$166,627	\$184,813	\$188,877	\$178,817	\$170,029
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	(\$2,001)	\$0	(\$1,643)	(\$75)
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$377	\$367	\$177	\$389	\$170
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$60	\$177	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$1,053	\$389	\$273	\$667	\$393
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$16	\$94	\$51	\$50
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$258	\$6,253	\$7,389	\$5,817	\$3,194
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$105	\$5,037	\$0	\$0	\$10
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$24	\$0	\$25	\$132	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$1	\$0	\$4	\$97
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$1,791	\$1,726	\$3,516	\$1,835	\$1,432

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2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$0	\$15	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$83	\$782	\$242	\$251	\$314
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$834	\$6,912	\$4,503	\$970	\$5,168
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$120	\$580	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$16	\$1,155	\$1,110	\$653	\$603
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$926	\$6,622	\$5,503	\$5,956	\$5,803
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$21	\$36	\$61	\$61
2IN002.000	CI-Customer Assistance	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$0	\$0	\$0	\$466	\$319
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$320	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$1,056	\$907	\$1,300	\$595	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$210	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$0	\$0	\$0	\$2,614
2IN002.000	CI-Customer Assistance	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$941	\$0	\$0	\$198	\$347
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$32	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$236	\$1,303	\$101	\$940	\$306
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$276	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$196	\$2,952	\$0	\$1,389	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$102	\$0	\$0	\$9,310
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$4,606	\$0	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$0	\$10,447	\$6,525	\$17,265	\$3,835
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6213680	MATL-CUSTOMER EVENT	\$0	\$0	\$260	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$0	\$0	\$0	\$11
2IN002.000	CI-Customer Assistance	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$0	\$3,114	\$7,906
2IN002.000	CI-Customer Assistance	Non-Labor	Supplemental Workforce	6220008	SRV-CONTRACTORS	\$0	\$0	\$0	\$0	(\$1,710)
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220020	SRV-AUDITING FEES	\$0	\$0	\$0	\$219,603	\$71,269
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$12,490	\$276,205	\$16,835	\$207,515	(\$20,949)
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$5,298	\$3,854	\$601	\$1,028	\$123
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$0	\$0	\$534	\$52,500
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220110	SRV-TELEVISION ADVERT	\$0	\$0	\$0	\$102	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220115	SRV-OUTDOOR ADVERTIS	\$0	\$0	\$0	\$1,278	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$0	\$0	\$69	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$0	\$0	\$183
2IN002.000	CI-Customer Assistance	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$0	\$12,204	\$1,012
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$18,074	\$287	\$6,475	\$95,096	\$123,081
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$0	\$0	\$2,203	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$6,365	\$4,688	\$8,367	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$76	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,712	\$93	\$3,017	\$1,148	\$712
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$0	\$212	\$164	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220432	SRV-MAIL-O/NIGHT EXP	\$0	\$0	\$0	\$56	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$0	\$0	\$384	\$496
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$14,752	\$6,568	\$6,724	\$6,771	\$8,745
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$0	\$15	\$0	\$26	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$34	\$193	\$0	\$0	\$87

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2IN002.000	CI-Customer Assistance	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$2,123,284	\$2,988,705	\$3,345,592	\$2,731,849	\$2,358,974
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$1,774	\$1,756	\$2,765	\$4,849	\$4,510
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6220670	SRV-RESRCH & DEVEL	\$0	\$0	\$0	\$855	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$1,579	\$3,453	\$1,662	\$19,495	\$2,200
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$15,597	\$46,810	\$7,000
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$2,978	\$496	\$0	\$0	\$1,049
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$540	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$19,946	\$21,615	(\$20,147)	\$636	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Purchased Services	6230830	SRV-LANGUAGE SRVS	\$0	\$162	\$3,601	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$748	\$12,104	\$6,851	\$6,762	\$11,521
2IN002.000	CI-Customer Assistance	Non-Labor	Dues	6250002	DUES-SOCIAL	\$0	\$0	\$1,321	\$3,353	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$40	\$66	\$28	\$65	\$73
2IN002.000	CI-Customer Assistance	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$84	\$0	\$55	\$325	\$156
2IN002.000	CI-Customer Assistance	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$2,071	\$2,212	\$1,012	\$605	\$1,021
2IN002.000	CI-Customer Assistance	Non-Labor	Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$156	\$521	\$449	\$286
2IN002.000	CI-Customer Assistance	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$0	\$0	\$0	\$0	\$33
2IN002.000	CI-Customer Assistance	Non-Labor	Misc NL Costs	6405000	A&G-MISC GENERAL EXP	\$0	\$0	\$0	\$0	\$0
2IN002.000	CI-Customer Assistance	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$2,223,849	\$3,367,350	\$3,432,524	\$3,403,520	\$2,664,237
2IN002.000	CI-Customer Assistance	TOTAL		TOTAL ALL		\$2,390,476	\$3,552,163	\$3,621,401	\$3,582,337	\$2,834,267
2IN003.000	CI-Energy Markets	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$1,532,329	\$1,478,461	\$1,415,432	\$1,409,593	\$1,434,615
2IN003.000	CI-Energy Markets	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$43,866	\$41,452	\$44,705	\$45,191	\$45,088
2IN003.000	CI-Energy Markets	Labor	Other Labor	6110256	SAL-MISC	\$3,165	\$0	\$1,883	\$729	\$1,237
2IN003.000	CI-Energy Markets	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$285,390	\$265,681	\$242,841	\$233,028	\$246,132
2IN003.000	CI-Energy Markets	Labor	Labor	Labor	TOTAL LABOR	\$1,864,751	\$1,785,594	\$1,704,861	\$1,688,542	\$1,727,073
2IN003.000	CI-Energy Markets	Non-Labor	Employee Related	6120019	EMP BEN-TRANSP ALLOW	\$366	\$119	\$114	\$394	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$10,329	\$4,810	\$2,787	\$2,633	\$1,845
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$352	\$119	\$157	\$72	\$39
2IN003.000	CI-Energy Markets	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$171	\$0	\$76	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$60	\$44	\$36	\$45	\$19
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$19,395	\$8,799	\$10,507	\$10,057	\$9,667
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$535	\$367	\$212	\$258	\$386
2IN003.000	CI-Energy Markets	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$5,947	\$6,834	\$4,836	\$2,631	\$1,160
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$223	\$389	\$572	\$405	\$229
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$1,047	\$601	\$586	\$512	\$227
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$5,302	\$2,889	\$3,997	\$3,154	\$4,033
2IN003.000	CI-Energy Markets	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$181	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$34	\$9	\$28	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$0	\$0	\$0	\$0	\$30
2IN003.000	CI-Energy Markets	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$20	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$1,066	\$816	\$1,036	\$752	\$418
2IN003.000	CI-Energy Markets	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$0	\$0	\$43	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$3	\$20	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$276	\$0	\$145	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$5,015	\$1,170	\$2,557	\$3,555	\$3,422

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2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$20	\$20	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$696	\$388	\$227	\$9	\$102
2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$14,953	\$15,648	\$17,033	\$18,464	\$18,261
2IN003.000	CI-Energy Markets	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$1,071	\$1,339	\$852	\$2,122	\$84
2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$143	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$0	\$0	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$40	\$0	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$0	\$31	\$140	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$38,040	\$34,797	\$16,357	\$21,384	\$6,653
2IN003.000	CI-Energy Markets	Non-Labor	Supplemental Workforce	6220003	SRV-CNSLT-JOINT VENT	\$0	\$0	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$0	\$0	\$0	(\$2,830)	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$983	\$1,403	\$1,153	\$1,202	\$355
2IN003.000	CI-Energy Markets	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$367	\$86	\$184	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$0	\$0	\$61	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Communication/Adv Svcs	6220421	SRV-COPY-ENGINEERING	\$2	\$0	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$114	\$0	\$1	\$22
2IN003.000	CI-Energy Markets	Non-Labor	Purchased Services	6220432	SRV-MAIL-O'NIGHT EXP	\$34	\$0	\$27	\$140	\$102
2IN003.000	CI-Energy Markets	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$0	\$689	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$7	\$10	\$29	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$16,381	\$16,135	\$14,318	\$15,671	\$15,600
2IN003.000	CI-Energy Markets	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$67	\$104	\$186	\$36	\$29
2IN003.000	CI-Energy Markets	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$3,125	\$2,336	\$0	\$3,865	(\$1,005)
2IN003.000	CI-Energy Markets	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$0	\$0	\$0	\$785	\$835
2IN003.000	CI-Energy Markets	Non-Labor	Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$4,188	\$4,150	\$2,620	\$3,969	\$4,740
2IN003.000	CI-Energy Markets	Non-Labor	Office/Furn Supplies	6230440	SRV-EXPRESS POSTAGE	\$45	\$151	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$1,113	\$0	\$0	\$1,099	\$1,005
2IN003.000	CI-Energy Markets	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$0	\$0	\$25	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$3,641	\$1,427	\$1,011	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Misc NL Costs	6240001	FIN CHAR-FINANCING F	\$0	\$108	\$1,300	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$3,401	\$1,681	\$1,536	\$1,350	\$465
2IN003.000	CI-Energy Markets	Non-Labor	Dues	6250002	DUES-SOCIAL	\$0	\$108	\$104	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$201	\$198	\$233	\$115	\$165
2IN003.000	CI-Energy Markets	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$130	\$411	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$11,473	\$9,312	\$7,154	\$6,983	\$4,649
2IN003.000	CI-Energy Markets	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$462	\$282	\$195	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Misc NL Costs	6340000	Cash Discounts on Pu	\$0	(\$0)	\$0	\$0	\$0
2IN003.000	CI-Energy Markets	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$150,500	\$117,205	\$93,088	\$99,293	\$73,534
2IN003.000	CI-Energy Markets	TOTAL		TOTAL ALL		\$2,015,251	\$1,902,798	\$1,797,949	\$1,787,834	\$1,800,607
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$4,644,731	\$4,309,290	\$4,223,041	\$4,217,520	\$3,951,860
2IN004.000	CI-Segment Services	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$4,621	\$5,248	\$3,256	\$3,576	\$3,389
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$247,170	\$207,199	\$175,152	\$159,436	\$153,461
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$19,572	\$19,744	\$20,416	\$18,142	\$20,809
2IN004.000	CI-Segment Services	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$173	\$497	\$607	\$367	\$739
2IN004.000	CI-Segment Services	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$0	\$0	\$2,361	\$0	\$0

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2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$0	\$0	\$56	\$0	\$0
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$18,195	\$2,154
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$46,072	\$50,070	\$111,881	\$0	\$0
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110171	SAL-PT TIME MGT S/T	\$0	\$0	\$0	\$40,417	\$54,534
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$35,235	\$14,924
2IN004.000	CI-Segment Services	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$114	\$69
2IN004.000	CI-Segment Services	Labor	Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$0	\$0	\$43	\$0	\$0
2IN004.000	CI-Segment Services	Labor	Overtime Labor T&1/2	6110181	SAL-PT TIME MGT T&H	\$0	\$0	\$0	\$0	\$156
2IN004.000	CI-Segment Services	Labor	Other Labor	6110256	SAL-MISC	\$20,583	\$0	\$14,461	\$9,255	\$25,246
2IN004.000	CI-Segment Services	Labor	Other Labor	6110270	SAL-SEVERENCE	\$31,731	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Labor	Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$36,653	\$0	\$17,500
2IN004.000	CI-Segment Services	Labor	Paid Time Off Labor	V&S	Add V&S to Adi-Rec Labor	\$906,148	\$802,690	\$762,055	\$720,811	\$705,492
2IN004.000	CI-Segment Services	Labor	Labor	Labor	TOTAL LABOR	\$5,920,801	\$5,394,738	\$5,349,981	\$5,223,067	\$4,950,332
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120013	EMP BEN-ANNUAL BENEF	\$0	\$0	\$0	\$0	\$85
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120018	EMP BEN-PRE-EMP PHYS	\$0	\$0	\$0	\$0	\$40
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120019	EMP BEN-TRANSP ALLOW	\$141	\$70	\$0	\$71	\$60
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120029	EMP BEN-COBRA TERM	\$2,216	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120075	EMP BEN-RANDOM TEST	\$0	\$488	\$189	\$705	\$524
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120078	EMP BEN-RET TOWRKEXM	\$0	\$281	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$60	\$177	\$0
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$0	\$1,021
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$538	\$2,285	\$3,109	\$2,724	\$1,955
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$324	\$260	\$352	\$1,039
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$19,220	\$24,973	\$20,388	\$13,313	\$15,660
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$1,936	\$1,750	\$1,341	\$1,081	\$723
2IN004.000	CI-Segment Services	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$2,044	\$4,122	\$4,689	\$2,964	\$2,457
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$1,687	\$368	\$267	\$166	\$276
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$129,058	\$98,129	\$98,332	\$97,479	\$86,171
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$3,753	\$3,540	\$2,668	\$2,713	\$2,376
2IN004.000	CI-Segment Services	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$42,105	\$33,874	\$31,348	\$33,441	\$26,152
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$4,932	\$3,837	\$1,643	\$1,118	\$58
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$2,698	\$3,498	\$2,623	\$1,458	\$2,781
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGD	\$38,168	\$38,092	\$33,059	\$25,800	\$37,647
2IN004.000	CI-Segment Services	Non-Labor	Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$0	(\$1,280)
2IN004.000	CI-Segment Services	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$20	\$0	\$434	\$7,646	\$0
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$6,618	\$1,384	\$2,738	\$2,264	\$1,227
2IN004.000	CI-Segment Services	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$328	\$988	\$594	\$1,177	\$762
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6210000	PURCHASED MATERIALS	\$0	\$0	\$975	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$0	\$0	\$553	\$503	\$117
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$1,988	\$982	\$277	\$0	\$30
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$3,426	\$2,425	\$1,297	\$133	\$121
2IN004.000	CI-Segment Services	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$573	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$27,138	\$19,965	\$30,166	\$30,654	\$28,696
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$0	\$21	\$1,888	\$0

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2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$2,758	\$37,278	\$7,852	\$6,232	\$17,086
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$36	\$830	\$45	\$43	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$338	\$319	\$268	\$221	\$2,782
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$6,823	\$7,645	\$12,055	\$13,013	\$7,939
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$309	\$381	\$220	\$73	\$24
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213080	MATL-REPAIR PARTS	\$0	(\$114)	\$73	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$28,162	\$39,185	\$47,089	\$27,573	\$27,780
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213090	MATL-FREIGHT	\$0	\$0	\$0	\$0	\$1,171
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$5,610	\$4,142	\$5,572	\$4,273	\$11,743
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213100	MATL-ACTUATORS	\$0	\$0	\$0	\$9,640	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$99	\$827	\$0	\$1,583	\$75
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$285	\$0	\$0	\$57
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$5,085	\$4,337	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$9,609	\$9,833	\$10,815	\$10,069	\$22,563
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213365	MATL-MEASURMT INSTRU	\$8,498	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213385	MATL-ELEC MISC	\$0	\$0	\$0	\$481	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$423	(\$520)	\$72
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$0	\$512	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$19,542	\$19,284	\$26,186	\$37,169	\$63,261
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$943	\$144	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213500	MATL-ROCK SAND DIRT	\$30	\$0	\$262	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$17	\$522	\$0	\$317	\$381
2IN004.000	CI-Segment Services	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$36	\$0	\$0	\$246	\$2,291
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213590	MATL-JANITORIAL SUPP	\$0	\$0	\$8,404	\$0	\$2,801
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213630	MATL-STORAGE EQUIPMT	\$0	\$0	\$0	\$0	\$1,352
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213680	MATL-CUSTOMER EVENT	\$30,515	\$28,835	\$14,893	\$11,377	\$22,664
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6215567	MI-PIPE	\$0	\$0	\$60	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$188	(\$155)	\$881	\$1,316
2IN004.000	CI-Segment Services	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$114,957	\$147,928	\$50,522	\$100,665	\$8,262
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$3,642	\$2,205	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220040	SRV-ADVTG IMAGE&BRND	\$0	\$0	\$0	\$0	\$229
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$122,283	\$462,700	\$40,272	\$69,171	\$682
2IN004.000	CI-Segment Services	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$16,704	\$138,463	\$137,517	\$194,668	\$263,907
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$53,829	\$49,070	\$92,291	\$56,088	\$65,447
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220062	SRV-FOOD-MAINT (CBS)	\$0	\$0	\$0	\$0	\$65
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$331	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$9,408	(\$277,783)	\$6,011	\$7,510	\$5,000
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$2,835	\$2,627	\$1,410	\$3,094	\$8,881
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$3,227	\$8,207	\$57,287	\$33,129	\$18,318
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$13,666	\$13,910	\$3,791	\$15,539	\$4,964
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$0	\$156	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$1,469	\$740	\$843	\$997	\$961
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$23	\$0	\$0	\$0	\$0

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DATE RESPONDED: FEBRUARY 5, 2015**

2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220403	SRV-PRINTNG ENVLOPES	\$1,317	\$0	\$0	\$83	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$46,948	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$490	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$10,712	\$3,217	\$3,721	\$536	\$1,125
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$1,324	\$21	\$33	\$281	\$200
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$7,709	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220432	SRV-MAIL-O'NIGHT EXP	\$74	\$53	\$90	\$525	\$138
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$196	\$32	\$65	\$125
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$20,559	\$9,126	\$9,154	\$9,022	\$11,361
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$93	\$0	\$0	\$0	\$97
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$211	\$1,746	\$27	\$100	\$680
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$3,687	\$6,600	\$2,096	\$1,218	\$2,604
2IN004.000	CI-Segment Services	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$64,253	\$19,269	\$120,105	\$223,674	\$290,422
2IN004.000	CI-Segment Services	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$45,343	\$63,484	\$21,850	\$74,428	\$53,237
2IN004.000	CI-Segment Services	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$21,714	\$22,587	\$60,366	\$48,270	\$30,011
2IN004.000	CI-Segment Services	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$112,037	\$49,173	\$23,538	\$0	\$7,750
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$0	\$0	\$0	\$163
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220850	SRV-VEH&EQUIP W/OPER	\$0	\$0	\$980	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$46,280	\$255,524	\$57,694	\$34,239	\$168,121
2IN004.000	CI-Segment Services	Non-Labor	Telephone Expenses	6220870	SRV-PHONE&COMMUN SYS	\$0	\$0	\$0	\$204	\$215
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220890	SRV-LANDSCAPING	\$0	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220930	SRV-ENRGY EFFICIENCY	\$0	\$0	\$2,600	\$784	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$1,116	\$0	\$0	\$759
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6220980	SRV-JANITORIAL	\$0	\$0	\$2,302	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$32,497	\$71,274	\$37,297	\$36,917	\$39,702
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$14	\$1	\$78	\$13	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6230440	SRV-EXPRESS POSTAGE	\$293	(\$147)	\$14	\$55	\$0
2IN004.000	CI-Segment Services	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$1,179	\$540	\$3,782	\$7,300	\$5,459
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6213680	MATL-CUSTOMER EVENT	\$30,515	\$28,835	\$14,893	\$11,377	\$22,664
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6215567	MI-PIPE	\$0	\$0	\$60	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$188	(\$155)	\$881	\$1,316
2IN004.000	CI-Segment Services	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$114,957	\$147,928	\$50,522	\$100,665	\$8,262
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$3,642	\$2,205	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220040	SRV-ADVTG IMAGE&BRND	\$0	\$0	\$0	\$0	\$229
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$122,283	\$462,700	\$40,272	\$69,171	\$682
2IN004.000	CI-Segment Services	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$16,704	\$138,463	\$137,517	\$194,668	\$263,907
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$53,829	\$49,070	\$92,291	\$56,088	\$65,447
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220062	SRV-FOOD-MAINT (CBS)	\$0	\$0	\$0	\$0	\$65
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$331	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$9,408	(\$277,783)	\$6,011	\$7,510	\$5,000
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$2,835	\$2,627	\$1,410	\$3,094	\$8,881
2IN004.000	CI-Segment Services	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$3,227	\$8,207	\$57,287	\$33,129	\$18,318
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$13,666	\$13,910	\$3,791	\$15,539	\$4,964

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2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$0	\$156	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$1,469	\$740	\$843	\$997	\$961
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$23	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220403	SRV-PRINTNG ENVELOPES	\$1,317	\$0	\$0	\$83	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$46,948	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$490	\$0
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$10,712	\$3,217	\$3,721	\$536	\$1,125
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220430	SRV-MAIL-GENERAL	\$1,324	\$21	\$33	\$281	\$200
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$7,709	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220432	SRV-MAIL-O/NIGHT EXP	\$74	\$53	\$90	\$525	\$138
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$196	\$32	\$65	\$125
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220450	SRV-MAIL-POSTAGE	\$20,559	\$9,126	\$9,154	\$9,022	\$11,361
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$93	\$0	\$0	\$0	\$97
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$211	\$1,746	\$27	\$100	\$680
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$3,687	\$6,600	\$2,096	\$1,218	\$2,604
2IN004.000	CI-Segment Services	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$64,253	\$19,269	\$120,105	\$223,674	\$290,422
2IN004.000	CI-Segment Services	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$45,343	\$63,484	\$21,850	\$74,428	\$53,237
2IN004.000	CI-Segment Services	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$21,714	\$22,587	\$60,366	\$48,270	\$30,011
2IN004.000	CI-Segment Services	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$112,037	\$49,173	\$23,538	\$0	\$7,750
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$0	\$0	\$0	\$163
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220850	SRV-VEH&EQUIP W/OPER	\$0	\$0	\$980	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$46,280	\$255,524	\$57,694	\$34,239	\$168,121
2IN004.000	CI-Segment Services	Non-Labor	Telephone Expenses	6220870	SRV-PHONE&COMMUN SYS	\$0	\$0	\$0	\$204	\$215
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220890	SRV-LANDSCAPING	\$0	\$0	\$0	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Purchased Services	6220930	SRV-ENRGY EFFICIENCY	\$0	\$0	\$2,600	\$784	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$1,116	\$0	\$0	\$759
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6220980	SRV-JANITORIAL	\$0	\$0	\$2,302	\$0	\$0
2IN004.000	CI-Segment Services	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$32,497	\$71,274	\$37,297	\$36,917	\$39,702
2IN004.000	CI-Segment Services	Non-Labor	Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$14	\$1	\$78	\$13	\$0
2IN004.000	CI-Segment Services	Non-Labor	Office/Furn Supplies	6230440	SRV-EXPRESS POSTAGE	\$293	(\$147)	\$14	\$55	\$0
2IN004.000	CI-Segment Services	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$1,179	\$540	\$3,782	\$7,300	\$5,459
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$16,962	\$3,988	\$14,877	\$3,847	\$3,460
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$18	\$8	\$30	\$13	\$19
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$276	\$0	\$89	\$0	\$8
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$715	\$17,269	\$15,477	\$15,984	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$0	\$2,545	\$200
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$4,451	\$0	\$142	\$609	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$22,252	\$13,214	\$11,753	(\$12,125)	\$23,721
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$0	\$0	\$201	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$0	\$0	\$5,752
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$0	\$0	\$0	\$35,729	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$1,283	\$617	\$1,182	\$1,943	\$765
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$365	\$0	\$0

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2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$9,622	\$21,400	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$469	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$68	\$32	\$0	\$31	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$23	\$0	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Purchased Services	6220432	SRV-MAIL-O/NIGHT EXP	\$0	\$0	\$0	\$12	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$14	\$23	\$0	\$0	\$19
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$357	\$461	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$0	\$0	\$3,513
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$0	\$20,536
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$738	\$0	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$1,670	\$966	\$810	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$7,142	\$6,974	\$6,789	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$135	\$221	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$27	\$48	\$0	\$0	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$1,184	\$1,119	\$1,147	\$902	\$695
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor	Misc NL Costs	6350742	MISC CHARGES	\$0	\$0	\$0	\$578	\$0
2200-0246	ENGY MKTS & CAP PROD DIR	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$81,093	\$78,181	\$64,071	\$61,516	\$71,677
2200-0246	ENGY MKTS & CAP PROD DIR	TOTAL		TOTAL ALL		\$313,776	\$272,041	\$283,380	\$286,156	\$337,531
2200-0328	PIPE PROD & CONT MGR	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$535,483	\$564,169	\$474,632	\$460,168	\$535,444
2200-0328	PIPE PROD & CONT MGR	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$96,762	\$98,617	\$78,836	\$73,673	\$88,991
2200-0328	PIPE PROD & CONT MGR	Labor		Labor	TOTAL LABOR	\$632,245	\$662,786	\$553,469	\$533,841	\$624,435
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$1,741	\$1,018	\$2,330	\$1,492	\$3,101
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$118	\$110	\$53	\$44	\$9
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$416	\$292	\$265	\$691	\$63
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$343	\$232	\$258	\$220	\$99
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$4,688	\$1,793	\$238	\$232	\$130
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$808	\$824	\$510	\$478	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$0	\$0	\$98	\$133	\$267
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$2,806	\$2,065	\$2,144	\$2,744	\$435
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$69	\$347	\$149	\$844	\$166
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$0	\$0	\$0	\$308	\$55
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$56	\$51	\$100	\$60	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$49	\$275	\$20	\$17	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$1,467	\$1,274	\$2,810	\$4,466
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$0	\$286	\$406	\$551	\$216
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$49,718	\$0	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Market Research	6220051	MARKET RESEARCH	\$0	\$0	\$0	\$5,111	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$515	\$30	\$26	\$722	\$702
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$32	\$0	\$31	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$0	\$48	\$0	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Purchased Services	6220432	SRV-MAIL-O/NIGHT EXP	\$0	\$0	\$26	\$65	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$0	\$28	\$0	\$0	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$0	\$0	\$0	\$0	\$54

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2200-0328	PIPE PROD & CONT MGR	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$0	\$0	\$0	\$307	\$741
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$1,342	\$0	\$219	\$0	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$0	\$209	\$239	\$237
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$40	\$39	\$702	\$838	\$1,306
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$524	\$0	\$0	\$0	\$0
2200-0328	PIPE PROD & CONT MGR	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$3,092	\$2,746	\$4,051	\$4,030	\$3,244
2200-0328	PIPE PROD & CONT MGR	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$16,606	\$11,635	\$62,845	\$21,969	\$15,290
2200-0328	PIPE PROD & CONT MGR	TOTAL		TOTAL ALL		\$648,851	\$674,421	\$616,313	\$555,810	\$639,725
2200-0330	CAP PROD MGR	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$422,032	\$482,240	\$477,748	\$477,881	\$442,684
2200-0330	CAP PROD MGR	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$76,261	\$84,296	\$79,354	\$76,509	\$73,574
2200-0330	CAP PROD MGR	Labor		Labor	TOTAL LABOR	\$498,293	\$566,536	\$557,101	\$554,389	\$516,259
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$675	\$709	\$0	\$398	\$431
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$15	\$32	\$0	\$7	\$0
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$18	\$0	\$0	\$0
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$60	\$41	\$0	\$28	\$28
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$40	\$19	\$0	\$18	\$18
2200-0330	CAP PROD MGR	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$17	\$0	\$0	\$0
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$77	\$40	\$0	\$77	\$75
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGD	\$0	\$692	\$0	\$169	\$0
2200-0330	CAP PROD MGR	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$1,180	\$0	\$0	\$0
2200-0330	CAP PROD MGR	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$116	\$176	\$55	\$437	\$0
2200-0330	CAP PROD MGR	Non-Labor	Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$280	\$0	\$0	\$19	\$0
2200-0330	CAP PROD MGR	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$66,238	\$65,340	\$63,687	\$15,334	\$0
2200-0330	CAP PROD MGR	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$1,771	\$3,693	\$5,148	\$5,413	\$2,121
2200-0330	CAP PROD MGR	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$0	\$0	\$59	\$91	\$215
2200-0330	CAP PROD MGR	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$64	\$223	\$0	\$23	\$87
2200-0330	CAP PROD MGR	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$0	\$0	\$549
2200-0330	CAP PROD MGR	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$164	\$2,146	\$6,267	\$17,523	\$19,694
2200-0330	CAP PROD MGR	Non-Labor	Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$0	\$1,204	\$0
2200-0330	CAP PROD MGR	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$134	\$131	\$0	\$116
2200-0330	CAP PROD MGR	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$188	\$0	\$0	\$0	\$0
2200-0330	CAP PROD MGR	Non-Labor	Telephone Expenses	6320004	TELE-PAGERS	\$64	\$101	\$54	\$81	\$0
2200-0330	CAP PROD MGR	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$69,753	\$74,561	\$75,401	\$40,823	\$23,335
2200-0330	CAP PROD MGR	TOTAL		TOTAL ALL		\$568,046	\$641,096	\$632,502	\$595,212	\$539,593
2200-2158	GAS SCHEDULING	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$417,217	\$449,991	\$404,751	\$425,153	\$465,480
2200-2158	GAS SCHEDULING	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$75,391	\$78,658	\$67,229	\$68,067	\$77,363
2200-2158	GAS SCHEDULING	Labor		Labor	TOTAL LABOR	\$492,608	\$528,650	\$471,980	\$493,220	\$542,842
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$1,614	\$1,078	\$1,322	\$649	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$0	\$103	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$115	\$107	\$21	\$102	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$759	\$1,098	\$237	\$228	\$36
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$230	\$192	\$183	\$65	\$9
2200-2158	GAS SCHEDULING	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$996	\$1,382	\$992	\$116	\$0

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2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$381	\$172	\$0	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$146	\$200	\$229	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$3,120	\$2,725	\$1,316	\$1,631	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$0	\$346	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$33	\$27	\$704	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$830	\$1,496	\$1,421	\$1,544	\$716
2200-2158	GAS SCHEDULING	Non-Labor	Office/Furn Supplies	6213015	MATL-OFc FURNITURE	\$211	\$0	\$0	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$72	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$35	\$0	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$0	\$44	\$289	\$42	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$30	\$13	\$0	\$20	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$5,656	\$2,018	\$0	\$0	\$80
2200-2158	GAS SCHEDULING	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$317	\$252	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$286	\$195	\$186	\$1,961	\$23
2200-2158	GAS SCHEDULING	Non-Labor	Other Materials	6213305	MATL-GASKETS	\$0	\$58	\$0	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$0	\$0	\$1,793	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$1,381	\$4,746	\$611	\$430	\$220
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$2,670	\$0	\$8,813	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6220280	SRV-IT-OTHER	\$2,459	\$1,275	\$0	\$511	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$0	\$0	\$183
2200-2158	GAS SCHEDULING	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$18,554	\$0	\$0	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$0	\$61	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$0	\$0	\$1,514	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$6	\$37	\$27	\$138	\$3
2200-2158	GAS SCHEDULING	Non-Labor	Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$0	\$0	\$0	\$11	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$3,427	\$4,169	\$3,029	\$3,197	\$3,940
2200-2158	GAS SCHEDULING	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$161	\$561	\$88	\$27	\$753
2200-2158	GAS SCHEDULING	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$711	\$4,761	\$3,144	\$0	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Office/Furn Supplies	6230434	SRV-COURIER	\$0	\$0	\$0	\$19	\$0
2200-2158	GAS SCHEDULING	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$198	\$185
2200-2158	GAS SCHEDULING	Non-Labor	Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$119	\$117	\$114	\$112	\$109
2200-2158	GAS SCHEDULING	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$6,607	\$5,456	\$5,074	\$5,012	\$4,752
2200-2158	GAS SCHEDULING	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$50,503	\$31,962	\$30,050	\$18,220	\$11,008
2200-2158	GAS SCHEDULING	TOTAL			TOTAL ALL	\$543,111	\$560,612	\$502,030	\$511,440	\$553,851
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Straight Time Labor	6110010	SAL-EXEC	\$252,288	\$246,951	\$247,839	\$216,940	\$195,153
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$63,263	\$64,343	\$113,046	\$51,931	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$0	\$0	\$2,460	\$3,354	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$114	(\$1)	\$38	\$0	\$481
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$0	\$182	\$91	\$0	\$192
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Overtime Labor DT	6110130	SAL-UNION D/T	\$0	\$0	\$0	\$0	\$412
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$0	\$78
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Other Labor	6110335	SAL-DEL LUNCH PREM	\$32	\$0	\$0	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$50,411	\$50,593	\$60,114	\$43,583	\$32,628

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2200-2282	VP CUSTOMER SOLUTIONS	Labor		Labor	TOTAL LABOR	\$366,108	\$362,069	\$423,587	\$315,809	\$228,944
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Related	6120036	EMP BEN-FINAN CONSUL	\$2,254	\$2,090	\$912	\$0	\$3,242
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$670	\$0	\$0	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$1,788	\$8,365	\$19,669	\$8,600	\$10,345
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$11	\$10	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$123	\$1,600	\$975
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$33	\$21	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$0	\$1,395	\$2,878	\$1,455	\$659
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$395	\$413	\$558	\$337	\$444
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$3,859	\$4,262	\$7,336	\$5,833	\$1,782
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$424	\$1,416	\$1,219	\$873	\$818
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$4,368	\$6,423	\$6,702	\$5,279	\$2,270
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$0	\$357	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$0	\$160	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$556	\$65	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$2,305	\$1,407	\$1,209	\$2,082	\$686
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$0	\$0	\$0	\$169	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$3,780	\$185	\$4,062	\$317	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$334	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$76	\$0	\$34	\$290	\$2,196
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$1,473	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$0	\$0	\$0	\$1,487	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Other Materials	6213490	MATL-APPAREL	\$0	\$0	\$0	\$291	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$0	\$0	\$600	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Other Materials	6215568	MI-NON PIPE	(\$1)	\$0	\$0	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Purchased Services	6220000	PURCHASED SERVICES	\$0	\$219,957	\$20,086	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Consulting	6220002	SRV-CONSULTING	\$2,221	\$2,575	\$0	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$2,436	\$4,296	\$5,992	\$14,699	\$1,167
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Luncheons	6220064	SRV-FOOD-MGMT(CBS)	\$0	\$0	\$0	\$232	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$0	\$0	\$197	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$2,457	\$13,849	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$0	\$1,108	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$98	\$57	\$128	\$822	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Purchased Services	6220580	SRV-ONLINE SRV MISC	\$38	\$29	\$42	\$10	\$29
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Purchased Services	6220590	SRV-MISCELLANEOUS	\$0	\$89	\$424	\$157	\$3,246
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$14,700	\$0	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$438	\$139	\$3,352	\$1,717	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$0	\$0	\$0	\$359	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$2,529	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Related	6230554	SRV-RECRUITING WEB	\$0	\$0	\$209	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$6,012	\$5,421	\$6,355	\$6,134	\$7,283
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$612	\$0	\$3,311	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$1,341	\$382	\$0	\$2,029	\$0

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2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$43	\$0	\$0	\$184	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Dues	6250002	DUES-SOCIAL	\$0	\$0	\$0	\$0	\$45
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$0	\$0	\$21	\$0	\$0
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$1,732	\$1,739	\$2,267	\$1,354	\$1,281
2200-2282	VP CUSTOMER SOLUTIONS	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$34,277	\$275,994	\$90,002	\$76,912	\$36,468
2200-2282	VP CUSTOMER SOLUTIONS	TOTAL		TOTAL ALL		\$400,385	\$638,062	\$513,590	\$392,721	\$265,412
2200-2329	GAS TRANSM PLNG	Labor	Straight Time Labor	6110020	SAL-MGMT S/T	\$480,428	\$457,316	\$487,771	\$523,566	\$484,548
2200-2329	GAS TRANSM PLNG	Labor	Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$0	\$0	\$0	\$16
2200-2329	GAS TRANSM PLNG	Labor	Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$0	\$874
2200-2329	GAS TRANSM PLNG	Labor	Straight Time Labor	6110173	SAL-PT TIME UN S/T	\$0	\$0	\$0	\$0	\$522
2200-2329	GAS TRANSM PLNG	Labor	Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$86,813	\$79,939	\$81,019	\$83,823	\$80,767
2200-2329	GAS TRANSM PLNG	Labor		Labor	TOTAL LABOR	\$567,241	\$537,254	\$568,790	\$607,389	\$566,727
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Related	6120019	EMP BEN-TRANSP ALLOW	\$0	\$0	\$140	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130001	EMP TRVL-AIR	\$344	\$336	\$293	\$2,242	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$214	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$135	\$132	\$176	\$359	\$531
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130014	EMP TRVL-PARKING	\$22	\$21	\$58	\$174	\$12
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$88	\$86	\$187	\$617	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$361	\$412	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$59	\$58	\$0	\$212	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$0	\$0	\$783	\$3,009	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$0	\$11	\$37	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$183	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$3,278	\$2,128	\$3,006	\$1,572	\$534
2200-2329	GAS TRANSM PLNG	Non-Labor	Computer Related	6213025	MATL-COMPUTER EQUIP	\$30	\$29	\$0	\$190	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Computer Related	6213030	MATL-SOFTWARE	\$3,802	\$2,639	\$3,480	\$5,739	\$2,860
2200-2329	GAS TRANSM PLNG	Non-Labor	Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$0	\$39	\$99	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Other Materials	6213085	MATL-MISCELLANEOUS	\$0	\$0	\$20	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$0	\$0	\$0	\$558
2200-2329	GAS TRANSM PLNG	Non-Labor	Computer Related	6213180	MATL-COMPUTR HARDWAR	\$315	\$308	\$9,065	\$417	\$52
2200-2329	GAS TRANSM PLNG	Non-Labor	Other Materials	6215568	MI-NON PIPE	\$0	\$0	\$0	\$153	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$1,562	\$1,525	\$73	\$0	\$557
2200-2329	GAS TRANSM PLNG	Non-Labor	Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$19,449	\$27,470	\$19,620	\$18,711	\$27,481
2200-2329	GAS TRANSM PLNG	Non-Labor	Computer Related	6220360	SRV-CMPTR ORD FFLMT	\$190	\$185	\$365	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$0	\$117	\$17	\$796
2200-2329	GAS TRANSM PLNG	Non-Labor	Supplemental Workforce	6220480	SRV-ENGINEERING	\$0	\$0	\$2,872	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Employee Training	6220640	SRV-TRNG & SEM IN-H	\$582	\$568	\$935	\$2,603	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Purchased Services	6220860	SRV-MAINT/REPAIR	\$1,148	\$1,121	\$1,091	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$426	\$416	\$292	\$530	\$272
2200-2329	GAS TRANSM PLNG	Non-Labor	Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$317	\$310	\$0	\$0	\$0
2200-2329	GAS TRANSM PLNG	Non-Labor	Misc NL Costs	6350710	CREDIT FOR CASH COLL	\$0	\$0	(\$7,834)	\$0	(\$25,010)
2200-2329	GAS TRANSM PLNG	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$31,749	\$37,335	\$35,364	\$37,273	\$8,642
2200-2329	GAS TRANSM PLNG	TOTAL		TOTAL ALL		\$598,991	\$574,590	\$604,154	\$644,663	\$575,369

ATTACHMENT A.8
ORA-SCG-DR-042-TLG, Q18

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18. For SCG’s CS-I, provide, in a spreadsheet similar to the one shown in workpapers on pages 333-334, a detailed and itemized listing of all costs incurred for one-time, unusual, or non-recurring costs for the years 2009 through 2013, including but not limited to studies, equipment demonstrations and testing, special projects and programs, surveys, training, contract expenses, product/project development, testing and/or implementation, etc.

SoCalGas Response 18:

Please see the attachment provided in response to question 17 above. The data shows that expenses fluctuate from year to year and across various cost categories, so it is more prudent to analyze the data aggregated to the total expense level.

One-time, unusual or non-recurring items were separately identified in workpaper adjustments. This includes the removal of items that have a separate recovery mechanism outside of the GRC. Please see the table below for the adjustments that were made for Customer Information in SCG-12-WP.

Work- paper	Workpaper Description		Workpaper Page	Cost Adjustment	Nominal (\$000)				
					2009	2010	2011	2012	2013
2IN002.000	CI- Customer Assistance	Non- Labor	71	NGAT Expenses			\$1,854		
2IN003.000	CI-Energy Markets	Labor	119-122	Montebello Storage	(\$13)	(\$11)	(\$10)	(\$10)	(\$10)
2IN003.000	CI-Energy Markets	Non- Labor	119-122	Montebello Storage	(\$15)	(\$15)	(\$15)	(\$15)	(\$16)
2200-0328	PIPE PROD & CONT MGR	Non- Labor	293-294	Montebello Storage		(\$5)	(\$7)	(\$6)	(\$7)

ATTACHMENT A.9
ORA-SCG-DR-042-TLG, Q19

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19. SCG's Customer Engagement & Insights Work Group forecasts \$8.891 million (\$26.673 million over three years) in TY 2016. This is an increase of \$2.972 million or 50.21% over 2013 recorded adjusted expenses of \$5.919 million. The five year average (2009-2013) is \$6.637 million. SCG's expenses declined each year between 2010 and 2013 from \$8.376 million in 2010 to \$5.919 million in 2013.
- a. SCG's forecast is \$2.972 million over 2013 recorded adjusted expenses. On page ADA-18 Table 5, SCG shows costs for incremental funding of \$2.254 million for nine additional FTE's (social media advisor, communication advisor, research analyst, community outreach advisor, creative services advisor, e-Service designer, e-Service analysts, and a web editor) and associated non-labor costs. Provide documentation that explains the proposed activities in more detail and which shows the calculation breakdown for \$0.718 million (the difference between the \$2.972 million and \$2.254 million).
 - b. Provide documentation that explains in detail if the same or similar activities as the ones shown on page ADA-18 are currently being performed by CS-I FTEs (i.e., coordinating information and printed information for hard to reach residential and business customers, ad campaigns, production of videos, maintaining/updating/enhancing social media pages, maintaining/updating/enhancing socialgas.com web and My Account, maintaining/updating/enhancing mobile applications and software, performing various customer/market research and surveys, community and customer outreach events, various one-time development and implementation costs, etc.).
 - c. Provide documentation that shows the costs incurred during 2009-2013 for activities associated with coordinating information and printed information for hard to reach residential and business customers, ad campaigns, production of videos, maintaining/updating/enhancing social media pages, maintaining/updating/enhancing socialgas.com web and My Account, maintaining/updating/enhancing mobile applications and software, performing various customer/market research and surveys, community and customer outreach events, various one-time development and implementation costs, etc.).
 - d. On page ADA-18, SCG's Table 5 shows lump sum figures that total its forecasts of \$2.254 million. SCG's testimony and workpapers are insufficient and incomplete to justify an incremental funding of 50.21%. Provide all supporting documentation and the basis for each number used in the calculation of the forecast expenses (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with source documentation).
 - e. Provide documentation that explains in detail if the forecast costs of \$2.254 million shown in SCG's Table 5 on page ADA-18 are the total costs for each of the proposed projects or are the costs listed the amount that will be incurred annually for a total forecast of \$6.762 million over three years.

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SoCalGas Response 19:

- a. On Ex. SCG-12, page ADA-18 Table 5, the incremental funding of \$2.254 million indicates expenses for incremental costs attributed to increased Customer Marketing & Communications activities, expanded Customer Insight & Analytics activities, new Creative Services activities, and additional eServices & Data Analysis activities in addition to the 5-year historical base forecast's existing activities. The \$0.718 million is the difference from 5-year average historical base forecast and 2013 base year expenses incurred for core activities (core activities as described in testimony, Ex. SCG-12, Section II.B.1). See the attachment provided in question 1b for a summary break down of the 5-year historical base forecast, 2013 base year expenses incurred, and forecasted TY 2016 expenses at workpaper level.

SoCalGas CS-I proposes a base forecast methodology of 5-year average instead of 2013 base year as SoCalGas-CSI believes a 5-year history of expenses presents a reasonable period of time to capture periodic and recurring expenses without selectively isolating historical expenses to overstate or understate costs, and is consistent with forecast methodologies in previous SoCalGas general rate cases for this area.(See Data Request response 1.a. and Ex. SCG-12 Section II.D.1.b., for further explanation regarding the use of 5-year historical average as base forecast).

The proposed activities for these incremental 9 FTEs are further described in SoCalGas response 19.b.

- b. Pertaining to Ex. SCG-12, Table 5, on page ADA-18:
- Customer Marketing & Communications
 - Historically, CS-I has 1 existing FTE dedicated to supporting social media. As indicated by the growing activity and continued growth trend of social media and volume of communications in Ex. SCG-12, Figure 2, and also described in Ex. SCG-12, Section II.B.3., the volume of activity has increased to necessitate an additional 2 FTEs to support.
 - Customer Insight & Analytics
 - CS-I has existing research analyst FTEs, however, growing requests from internal stakeholders for research and studies necessitates an additional FTE to support the increased volume of activity.
 - Creative Services
 - A Customer Engagement & Insights in-house community outreach advisor is a new activity for CS-I.
 - A creative services advisor to provide comprehensive purview and unify communication messaging content (which demonstrated growth trends of nearly 3x magnitude from 2012 to 2014) is a new role that CS-I does not historically have a dedicated FTE to perform.

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SoCalGas Response (Continued)

- eServices & Data Analysis
 - e-Service designer: The My Business Account is a new platform that will require ongoing support, and is a new activity.
 - E-Service analyst: 0.25 of this 1 FTE is to provide ongoing support for a new, completed capital IT project (My Business Account), and to support an existing socialgas.com and My Account platform, which currently does not have dedicated FTEs to provide continual maintenance and enhancement support, and is considered a new activity.
 - E-Service analyst: This FTE is to support Integrated Customer Data Analytics, a new, completed capital IT project that will require ongoing support and is a new activity.
 - Web editor: 0.75 of this 1 FTE is to support My Account Mobile 1C, a new, completed capital IT project that will require ongoing support and is a new activity. 0.25 of this 1 FTE is to support an existing socialgas.com and My Account platform, which currently does not have dedicated FTEs to provide continual maintenance and enhancement support, and is considered a new activity.
- c. Please see SoCalGas attachment in question 17 for 2009-2013 historic costs for activities as listed above, which are performed within Workpaper 2IN001.000.
- d. SoCalGas CS-I is requesting \$2.254 million incremental over the five-year historical base forecast of \$6.637 million, which represents an incremental funding of 33.96% for both expanded existing activities and new activities.

SoCalGas CS-I proposes a base forecast methodology of 5-year average instead of 2013 base year as SoCalGas-CSI believes a 5-year history of expenses presents a reasonable period of time to capture periodic and recurring expenses without selectively isolating historical expenses to overstate or understate costs, and is consistent with forecast methodologies in previous SoCalGas general rate cases for this area. Please see Data Request response 1.a, and Ex. SCG-12 “Forecast” subsections in II.B.2 for explanation regarding the use of 5-year historical average as base forecast.

Supporting documentation and the basis for each incremental FTE requested was provided in SoCalGas CS-I’s response to question 5. Supporting documentation and the basis used for the calculation of the non-labor forecast (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with a source document) was provided in SoCalGas CS-I’s response to question 8.

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SoCalGas Response (Continued)

- e. In Ex.SCG-12, Table 5, \$2.254 million are the forecasted total costs of the incremental Customer Engagement & Insights activities presented as incurred annually.

ATTACHMENT A.10
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20. SCG's Customer Assistance Work Group forecasts \$4.253 million (\$12.759 million over three years) in TY 2016. This is an increase of \$1.419 million or 50.07% over 2013 recorded adjusted expenses of \$2.834 million. The five year average (2009-2013) is \$3.196 million. SCG's expenses declined each year between 2011 and 2013 from \$3.620 million in 2011 to \$2.834 million in 2013.
- a. SCG's forecast is \$1.419 million over 2013 recorded adjusted expenses. On page ADA-34 Table 8, SCG shows costs for incremental funding of \$1.057 million. Provide documentation that explains the proposed activities in more detail and that shows the calculation breakdown for \$0.362 million (the difference between the \$1.419 million and \$1.057 million).
 - b. On page ADA-34, SCG's Table 8 shows lump sum figures that total its forecasts of \$1.057 million. SCG's testimony and workpapers are insufficient and incomplete to justify an incremental funding of 50.07%. Provide all supporting documentation and the basis for each number used in the calculation of the forecast expenses (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with source documentation).
 - c. Provide documentation that explains in detail if the forecast costs of \$1.057 million shown in SCG's Table 8 on page ADA-34 are the total costs for each of the proposed projects or are the costs listed the amount that will be incurred annually for a total forecast of \$3.171 million over three years.
 - d. Provide documentation that explains in detail if during 2009-2013 SCG's Customer Assistance Work Group performed activities associated with achieving the "Commission's mandated number of homes to be treated by 2020" that were related to the Energy Savings Assistance (ESA) program, Natural Gas Appliance Testing, and engaged in outreach activities for Medical Baseline.
 - e. Provide documentation that shows the costs incurred during 2009-2013 for activities associated with achieving the "Commission's mandated number of homes to be treated by 2020" that were related to the Energy Savings Assistance (ESA) program, Natural Gas Appliance Testing, and outreach activities for Medical Baseline.
 - f. Provide documentation that explains in detail how long SCG was aware that the "Most recent study of SoCalGas's Medical Baseline eligible population continues to be from the 2010 report from Athens Research."

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Question 20 (Continued)

- g. SCG states on page ADA-32 that “At the end of 2013, approximately 32,000 customers were enrolled in MBL [Medical Baseline].” The 2010 report from Athens Research estimates an MBL eligible population of approximately 71,000. Provide documentation that explains in detail if during 2011-2013 SCG failed to perform outreach, enrollment and application processing activities and failed to coordinate with Community Based Organizations on MBL. If not, explain what SCG has been doing to increase the MBL enrollment since reviewing the 2010 Athens Research study and considering that its recorded adjusted expenses have declined between 2011-2013.

SoCalGas Response 20:

- a. On Ex. SCG-12, page ADA-34 Table 8, the incremental funding of \$1.057 million indicates expenses for incremental costs attributed to NGAT activities and additional Medical Baseline outreach/education and research over the 5-year historical base forecast’s existing activities. The \$0.362 million is the difference from 5-year historical base forecast and 2013 base year expenses incurred for core activities (core activities as described in testimony, Ex. SCG-12, Section II.C.1). See attachment provided in question 1b for a summary break down of the 5-year historical base forecast, 2013 base year expenses incurred, and forecasted TY 2016 expenses at workpaper level.

Please see Data Request response 1.a., 1.b. and Ex. SCG-12 “Forecast” subsections in II.B.2., II.C.2., II.D.1.b., II.D.2.b., III.B.2, for further explanation regarding SoCalGas’s forecast methodology for CS-I.

- b. SoCalGas CS-I is requesting \$1.057 million incremental over the five-year historical base forecast of \$3.196 million, which represents an incremental funding of 33.07% to support a larger volume of Natural Gas Appliance Testing over the 5-year historical average, and for incremental (non-labor) costs for expanded outreach and education to support Medical Baseline enrollment.

Please see Data Request response 1.a., 1.b. and Ex. SCG-12 “Forecast” subsections in II.B.2., II.C.2., II.D.1.b., II.D.2.b., III.B.2, for further explanation regarding SoCalGas’s forecast methodology for CS-I.

As stated in Ex. SCG-12, ADA-34, Table 8, the NGAT component is \$807,000 incremental to the NGAT program’s 5-year average \$2.703 million (See Ex. SCG-12-WP, Page 105 of 433, “NGAT Cost Components Calculation” for detailed breakdown of NGAT historical numbers), and is presented as an annual incremental basis.

In Ex. SCG-12-WP, Page 105 of 433, the following information is presented:

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- “# of Treated Homes”: the recorded number of home weatherization activities associated with Energy Savings Assistance (“ESA”) is provided for each historic year (from 2009-2013). NGAT is driven by ESA activity (see Ex.SCG-12, Section II.C.1.”Energy Savings Assistance Programs Related to Natural Gas Appliance Testing” for further explanation);
- “# of Homes That Received NGAT”: the recorded number of related homes from ESA weatherization activities (from 2009-2013) that also received NGAT;
- “Homes Treated %”: the calculated equivalent percentage of ESA homes treated for NGAT each year (“# of Homes That Received NGAT” divided by “# of Treated Homes”);
- “NGAT Annual Cost”: the recorded nominal cost of NGAT for the program each year;
- “NGAT Cost Per Unit”: the calculated equivalent nominal cost per unit (“NGAT Annual Cost” divided by “# of Homes That Received NGAT”);
- “NGAT Cost Per Unit (2013 \$s)”: the NGAT Cost Per Unit escalated to constant 2013\$ for GRC purposes, (“NGAT Cost Per Unit” multiplied by “escalation rates, Non_Labor_Rate”); and
- “NGAT Annual Cost (2013 \$s)”: the calculated annual NGAT cost escalated to constant 2013\$ for GRC purposes, (“NGAT Cost Per Unit (2013 \$s)” multiplied by “# of Homes That Received NGAT”).

In each year of the period 2009-2013, NGAT expenditures have been driven by the following three factors:

- The number of units treated under the ESAP program. This figure has averaged 113,742 over 2009-2013, but from year-to-year the figure has been as high as 161,020 and as low as 83,493 based on the opportunities that occur in the delivery of that program and Commission requirements as discussed in testimony, Ex. SCG-12, Section II.C.1. “Energy Savings Assistance Programs Related to Natural Gas Appliance Testing”.
- The proportion of ESAP-treated homes that need NGAT, based on the safety requirements of the energy efficiency measures installed under the program.
- The average cost per NGAT service. SoCalGas has paid a nominal \$28.50 per service to its ESAP contractors for this service throughout 2009-2013, resulting in a 5-year average \$29.68 in 2013 dollar terms.

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Below is the 5-year history of these three key factors:

Year	# Of ESA Treated Homes	% Of Homes Receiving NGAT	NGAT cost per unit (2013 \$s)
2009	83,493	80%	\$31.82
2010	120,358	80%	\$30.98
2011	161,020	72%	\$28.72
2012	96,893	94%	\$29.48
2013	106,948	81%	\$27.41
5-year Average	113,742	81%	\$29.68

SoCalGas’ 5-year historical average NGAT expenditure of \$2.703 is the product of these three factors. SoCalGas’ TY2016 forecast is higher for all three factors as discussed below, resulting in the incremental \$807 forecast:

- SoCalGas forecasts homes treated in TY 2016 will be 118,000 as discussed in Ex. SCG-12, Section II.C.3. While higher than the 5-year average, this figure is substantially lower than SoCalGas’ current annual goal of 136,836 treated units per year adopted in D.12-08-044.
- SoCalGas forecasts that in TY 2016, 85% of homes will require NGAT as discussed in Ex.SCG-12, Section II.C.3. While the 2009-2013 5-year historic average was 81%, when treating the lowest year (2009: 83,493 homes treated) and highest year (2011: 161,020 homes) of ESAP-treated homes as outliers, and looking at the proportion trend (ESA treated homes receiving NGAT) in years 2010, 2012, and 2013 (where a more similarly number of treated homes as we anticipate will be treated in TY2016 will be performed), the average was 85%.
- SoCalGas expects the average cost of NGAT service to increase to \$35 per test by TY2016, as discussed in detail at Ex.SCG-12, Section II.C.3.

The product of these figures (118,000 treated units x 85% receiving NGAT x \$35/NGAT) amounts to an annual program funding requirement of \$3.511 million, or \$0.807 million above the 5-year cost average of \$2.703 million as stated in Table 8.

For Medical Baseline, see SoCalGas response in Question 8 for supporting documentation and the basis for each number used in the calculation of the forecast non-labor expenses (documentation that demonstrates the individual breakdown of costs included in each estimate along with source documentation).

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SoCalGas Response 20 (Continued)

- c. In Ex.SCG-12, Table 8, \$1.057 million are the forecasted total costs for NGAT and Medical Baseline activities presented as incurred annually.
- d. As discussed in SoCalGas' Response to Question 20b, during the 2009-2013 period, the Customer Assistance Work Group performed NGAT activities on an average of 91,463 homes (corresponding to 113,742 ESA treated units per year x 81% requiring NGAT) at an average cost of \$29.68 per unit, for an average annual expenditure of \$2.703 million. All such activities were performed by SoCalGas' contractors in the course of delivering ESA services associated with achieving the Commission's 2020 goal. In order to achieve the 2020 goal, SoCalGas expects that the annual rate of ESA treated homes per year will increase to 118,000 from its average level 113,742. In general, this increase is driven by the need to achieve the 2020 goal, as discussed above at 20b and at Ex. SCG-12, Section II.B.3. SoCalGas further anticipates that 85% of treated units will require NGAT, consistent with historical experience, as discussed above at 20b and at Ex. SCG-12, Section II.B.3. Finally, SoCalGas anticipates that the average cost per NGAT service will increase to \$35/unit from its 5-year average \$29.68. This expected increase is driven by market pressure on the rate SoCalGas pays for the service, which has not yet experienced adjustments for inflation or market conditions throughout the period of 2009-2013, as discussed above at SoCalGas response to question 20.b. and in Ex. SCG-12, Section II.B.3. Medical Baseline (MBL) is not associated with achieving the "Commission's mandated number of homes to be treated by 2020." MBL is a stand-alone program and is not associated directly with the Energy Savings Assistance Program.
- e. Please see SCG-12-WP, Page 105 of 433, as well as response to question 20.d.for documentation that shows the GRC-relevant costs incurred during 2009-2013 for activities associated with achieving the "Commission's mandated number of homes to be treated by 2020" that were related to the Energy Savings Assistance ("ESA") program, which consists of Natural Gas Appliance Testing.

Medical Baseline (MBL) is not associated with achieving the "Commission's mandated number of homes to be treated by 2020." MBL is a stand-alone program and is not associated directly with the Energy Savings Assistance Program.

- f. SoCalGas' Medical Baseline ("MBL"), a subgroup of Customer Assistance, was aware that the Athens Research study had limitations; however, at the time, it was the primary source document utilized by the four Investor Owned Utilities ("IOUs") to identify potential population for the MBL program. The structure of the study as described by Athens Research, made minor use of statewide RASS *2003* data. The study relied on

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SoCalGas Response 20 (Continued)

data from Southern California Edison (“SCE”). The SCE data provided an aggregate/confidential historical frequency table that illustrated the disease/condition percentage composition of MBL recipients. This came from historical data when the utilities would capture such data but eventually stopped storing disease condition electronically due to privacy issues; the SCE data was used to identify the major players among MBL allocations, and determine groupings of ailments to use in estimating a ratio adjustment to provide rough eligibility or potential estimates. In addition, the SCE data was used to work out "reasonable" enrollment to population prevalence estimates to apply to utilities.

The methodology utilized in the 2010 Athens Research Study has become outdated and therefore, SoCalGas is requesting incremental funding for a new study to ensure that SoCalGas can identify and enroll those customers who qualify for the MBL program.

- g. The Medical Baseline (“MBL”) program at SoCalGas only applies to customers with space heating. As such, MBL outreach activities typically ramp up prior to the winter season, and expenses are typically incurred at the 4th quarter of each year. Subsequently, the timing of these charges have facilitated the appearance of significant cost variances year-to-year when expenses have been mischarged at the end of the year (such as December), and corrected the following month of a new year (January).

An example of this would be the 2013 adjusted-recorded historical expenses for Medical Baseline, which does not include an adjustment for an additional \$67,425 of Medical Baseline expenses that was mistakenly posted to the CARE Outreach cost account (GRC excluded) by error in December 2013, but was corrected in January 2014. In Ex. SCG-12-WP, Page 404 through 407, similar mischarges and corrections have been indicated.

These inconsistent timing of recording expenses is another example for why SoCalGas CS-I proposed base forecast methodology of 5-year average instead of 2013 base year. See SoCalGas CS-I Data Request response to Question 1.a. and Ex. SCG-12 “Forecast” subsections in II.C.2 for further explanation regarding the use of 5-year historical average as base forecast. SoCalGas-CSI believes a 5-year history of expenses presents a reasonable period of time to capture periodic and recurring expenses without selectively isolating historical expenses to overstate or understate costs, and is consistent with forecast methodologies in previous SoCalGas general rate cases for this area.

Average spending over the 5-year 2009-2013 historic period was \$159,000. The 2013 base year spend for MBL was above the 5-year historic at \$165,000. During 2011 - 2013 SoCalGas CS-I took the following steps to increase participation in the MBL program:

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SoCalGas Response 20 (Continued)

- Twenty-one months out of the 36-month period, MBL was included in our “For Your Information” Safety and Billing insert, and it was featured in an article in our Gas Company News bill insert,
- Completed an MBL campaign targeting doctor’s offices,
- Participated in outreach events that targeted individuals with disabilities such as the Southern California MS Walks, and participated in the CHANGES program, and
- Produced a Customer Assistance video which included Medical Baseline. The video was shown at presentations with Social Workers who could share information about the program with their clients.

ATTACHMENT A.11
ORA-SCG-DR-042-TLG, Q21

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21. SCG's Customer Segment Markets Work Group forecasts \$11.491 million (\$34.473 million over three years) in TY 2016. This is an increase of \$3.171 million or 38.11% (increase of 44.39% for Segment Services over 2013 expenses of \$6.519 million and a 15.38% increase for Energy Markets & Capacity Products over 2013 expenses of \$1.801 million) over 2013 recorded adjusted expenses of \$8.320 million. The five year average (2009-2013) for Energy Markets & Capacity Products is \$1.861 million. The five year average (2009-2013) for Segment Services is \$6.822 million. SCG's expenses for both Work Groups have remained relatively stable between 2010 and 2013.
- a. SCG forecasts \$2.078 million for its Energy Markets & Capacity Products in TY 2016, which is \$277,000 over 2013 recorded adjusted expenses. On page ADA-46 Table 11, SCG shows costs for incremental funding of \$217,000 for two additional FTE's (Account representative and Staff advisor). Provide the documentation that explains the forecast activities and shows the calculation breakdown for \$60,000 (the difference between the \$277,000 and \$217,000).
 - b. Provide documentation that explains in detail if during 2009-2013 SCG's FTEs performed activities to "meet the increased account management activities for EG [electric generation] and EOR [enhanced oil recovery] customers and increased account management and new tariff implementation activities for California gas producer and biogas producer interconnectors" and performed activities to "ensure adequate tools, communications, controls and analysis capabilities are in place to support the increased account management activities." (Citing Ex. SCG-12, p. ADA-45).
 - c. Provide documentation that shows the costs incurred during 2009-2013 for account management activities for electric generation (EG) and enhanced oil recovery (EOR) customers, account management for new tariff implementation activities for California gas producer and biogas producer interconnectors, and activities to ensure adequate tools, communications, controls and analysis capabilities were in place to support account management activities.
 - d. SCG states on page ADA-45 that it needs additional FTEs to "meet the increased account management activities for EG and EOR customers and increased account management and new tariff implementation activities for California gas producer and biogas producer interconnectors." Provide documentation that explains in detail and demonstrates "the increased account management activities for EG and EOR customers and increased account management and new tariff implementation activities" that has taken place between 2009-2013 considering SCG's recorded costs have remained relatively stable over the last five years.
 - e. SCG forecasts \$9.413 million for its Segment Services in TY 2016, which is \$2.894 million over 2013 recorded adjusted expenses. On page ADA-56 Table 12, SCG shows costs for incremental funding of \$2.562 million. Provide documentation that explains the

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Question 21 (Continued)

forecast activities and shows the calculation breakdown for the \$0.332 million (the difference between the \$2.894 million and \$2.562 million).

- f. Provide documentation that explains in detail if the same or similar activities as the ones shown on page ADA-56 are currently being performed and related costs incurred by CS-I FTEs (i.e., performing market research, preparing communication and promotional materials, preparing educational and outreach materials associated with My Business, employee travel, development and implementation costs, etc.).
- g. Provide documentation that shows the costs incurred during 2009-2013 for market research, communication and promotional materials, educational and outreach materials associated with My Business, employee travel and other expenses, development and implementation costs, etc.
- h. On page ADA-56, SCG's Table 12 shows lump sum figures that total its forecast of \$2.562 million. SCG's testimony and workpapers are insufficient and incomplete to justify incremental funding of 44.39%. Provide all supporting documentation and the basis for each number used in the calculation of the forecast expenses (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with source documentation).
- i. Provide documentation that explains in detail if the forecast costs of \$2.562 million shown in SCG's Table 12 on page ADA-56 are the total costs for each of the proposed projects or are the costs listed the amount that will be incurred annually for a total forecast of \$7.686 million over three years.
- j. Regarding activities performed by FTEs in SCG's Residential Market Services and its Clean Energy Builder Services, SCG states on pages ADA-51 and ADA-50 that these two groups perform data analytics to define customer needs and expectations and that these activities are "complementary to, but not duplicative of the market research performed by the Customer Engagement & Insights group." Provide the documentation that specifically shows all FTEs, recorded costs (2009-2013) and identifies all projects, programs, and activities for SCG's Residential Market Services, Clean Energy Builder Services, and Customer Engagement & Insights group that had costs that were considered "complementary to, but not duplicative of the market research performed by the Customer Engagement & Insights group."

SoCalGas Response 21:

- a. On Ex. SCG-12, page ADA-46 Table 11, the incremental funding of \$217,000 indicates expenses for expanded or additional activities over the 5-year historical average base forecast's existing core activities (core activities as described in testimony, Ex. SCG-12, Section II.D.1.a). The \$60,000 is the difference from 5-year historical average base forecast and 2013 base year expenses incurred. See attachment provided in question 1b for a summary break down of the 5-year historical base forecast, 2013 base year expenses incurred, and forecasted TY 2016 expenses at workpaper level.

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SoCalGas Response 21 (Continued)

Please see Data Request response 1.a., 1.b. and Ex. SCG-12 “Forecast” subsections in II.B.2., II.C.2., II.D.1.b., II.D.2.b., III.B.2, for further explanation regarding SoCalGas’s forecast methodology for CS-I.

- b. Commission orders that would drive incremental activities described in testimony were not issued in 2013 or after 2013. For example, the Southern California Edison Local Capacity Requirements Request for Offer (SCE LCR RFO) for new generation was approved in February 2013 and the RFO was not issued until September 12, 2013. The Commission resolution approving the CA Producer interconnection decision implementation advice letter was not approved until December 2013, and the decision implementing the AB 1900 Biomethane implementation tasks in R.13-02-008, was not issued until after 2013. Energy Markets responded to CA Producer, biogas producer, large EG and EOR inquiries that were anticipating final decisions in these proceedings or acting on expectation of sustained high oil prices with existing resources.
- c. Please see SoCalGas’ response to question 21.b above.
- d. Please see SoCalGas’ response to question 21.b above.
- e. On Ex. SCG-12, page ADA-56 Table 12, the incremental funding of \$2.562 million indicates expenses for expanded or additional activities over the 5-year historical base forecast’s existing core activities. The \$0.332 million is the difference from 5-year historical base forecast and 2013 base year expenses incurred for core activities (core activities as described in testimony, Ex. SCG-12, Section II.D.2.a). Please see attachment provided in 1b for a summary break down of the 5-year historical base forecast, 2013 base year expenses incurred, and forecasted TY 2016 expenses at workpaper level.

Please see Data Request response 1.a., 1.b. and Ex. SCG-12 “Forecast” subsections in II.B.2., II.C.2., II.D.1.b., II.D.2.b., III.B.2, for further explanation regarding SoCalGas’s forecast methodology for CS-I.

- f. With respect to Ex. SCG-12, Table 12, ADA-56, “Small/Medium Business Support Services”, no activities are currently being performed, nor related costs incurred by CS-I FTEs for market research, communication and promotional materials, travel and trade show expenses, and education and outreach material to support promotion of the My Business portal. The My Business portal is a new service with an anticipated first release expected in April 2015, with additional phases to continue providing further enhancements.

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SoCalGas Response 21 (Continued)

The 2009-2013 SoCalGas historical expenses do not include dedicated FTEs for a Small/Medium Business Support Services subgroup. See Ex.SCG-12, Table 9, ADA-39: currently there are dedicated Account Representatives (and other Advisor and Project Manager roles) to support Energy Markets, Select Industry, Geographically Assigned Commercial & Industrial Customers, and (as of mid-2013) the growth of a dedicated subgroup of FTEs to support Residential, Home Builders, and Developers. Geographically Assigned Commercial & Industrially Customer Account Representatives support Small/Medium Business customers on a reactionary basis. The Small/Medium Business Support Services incremental request is to provide proactive support to this customer segment (see Ex. SCG-12, Section II.D.2.c for further detail).

- g. No costs were incurred. For further explication, please see SoCalGas' response to question 21f above.
- h. SoCalGas's forecast of \$2.562 million incremental is 37.55% over the 5-year base average expenses (\$6,822) of labor and non-labor combined.

Please see SoCalGas' response to question 8 above for supporting documentation and the basis for each number used in the calculation of the forecast non-labor expenses (documentation that demonstrates the individual breakdown of costs included in each estimate along with source documentation).

Please see SoCalGas' response to question 6 above for supporting documentation and the basis for each number used in the calculation of the forecast labor expenses.

- i. In Ex.SCG-12, Table 12, \$2.562 million are the forecasted total costs of the incremental Segment Services activities presented as incurred annually.
- j. Residential Market Services and Clean Energy Builder Services are responsible for managing their respective customer segments and developing market strategies. These activities entail utilizing numerous data sources for analysis to define customer needs and expectations. This includes, but is not limited to, requesting Customer Engagement & Insights to provide: internal operational data, external/public data, primary and secondary customer research to Residential Market Services and Clean Energy Builder Services as a business owner/client (see Ex.SCG-12, page ADA-B-1). Residential Market Services and Clean Energy Builder Services aggregate this data to develop/ create/ enhance/ improve programs and services that meet customer needs and drive engagement.

In comparison, Customer Engagement & Insights are responsible for developing and executing primary quantitative and qualitative customer research for internal stakeholders

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SoCalGas Response 21 (Continued)

(see Ex.SCG-12, page ADA-B-1). This includes, but is not limited to, working with outside research suppliers in designing research scope, developing the questionnaire/moderator's guide, determining the target sample, oversee data collection and report writing. Findings from these activities are one of many data inputs used by the Residential Market Services and Clean Energy Builder Services team.

Please see attached file ORA-SCG-DR-042-TLG-21j Attachment.xlsx that provides the historic recorded non-labor and labor cost details for Residential Services and Builder Services. Research specifically commissioned to support Residential Services and Builder Services are costs incurred by Residential Services and Builder Services as business owners/clients of Customer Engagement & Insights. The one exception when Residential Services and Builder Services do not incur research costs from Customer Engagement & Insights is when Residential and Builder Services seek existing research or data already available in-house which is managed and made available by Customer Engagement & Insights.

Appendix B

Lee, Jessica. "Brands Expected to Respond Within an Hour on Twitter [Study]", Search Engine Watch, November 1, 2013.

Home > Social > Twitter

Brands Expected to Respond Within an Hour on Twitter [Study]

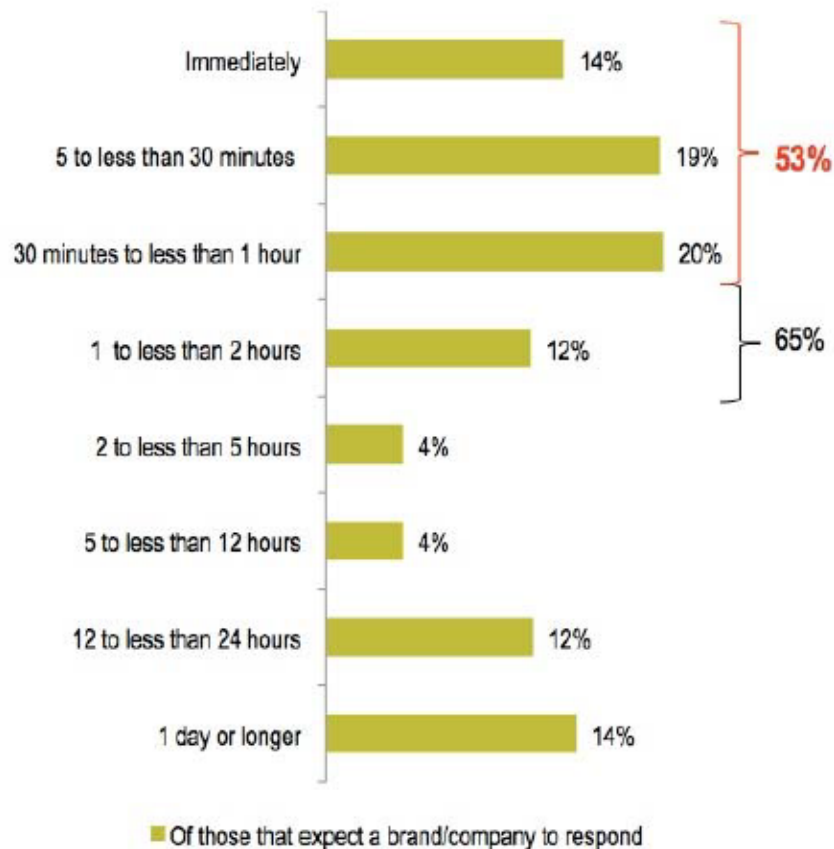


By Jessica Lee, Nov 1, 2013

5 Comments

Social

The next time you think about putting off a response to that tweet your brand just received on Twitter – or not responding at all – think again. According to research put out by Lithium Technologies, more than 70 percent of users expect to hear back from the brand they're interacting with on Twitter, and 53 percent want a response within the hour.



Appendix C

2013 Safety and Winter Conservation Messaging Campaign Examples



OBSERVE ESCUCHE HUELA

Southern California Gas Company
 Cuando se trate de seguridad, use los sentidos.
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DESPRENDA

Sepa qué hay debajo.

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함께 배워보세요. 천연 가스를 안전하게 사용하는 것은 우리 모두의 책임입니다.
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보기
 • 가스 기구 연결 부위의 손상
 • 공기 중에 흩날리는 먼지나 수증기
 • 공압관이 있는 구역이나 근처에 있는 식물 (연소에 습기가 4-48시간 구역에 있음)이 죽었거나 죽어감
 • 공압관 근처에서 열 발생은 화재의 위험
 • 기구 교체, 흡수 또는 기타 개혁 발생 후 노출된 공압관

듣기
 • 가스공 또는 가스 기구 근처에서 나는 휘파람 소리, 삐걱거리는 소리나 울렁거리는 소리 등 이상한 소리.

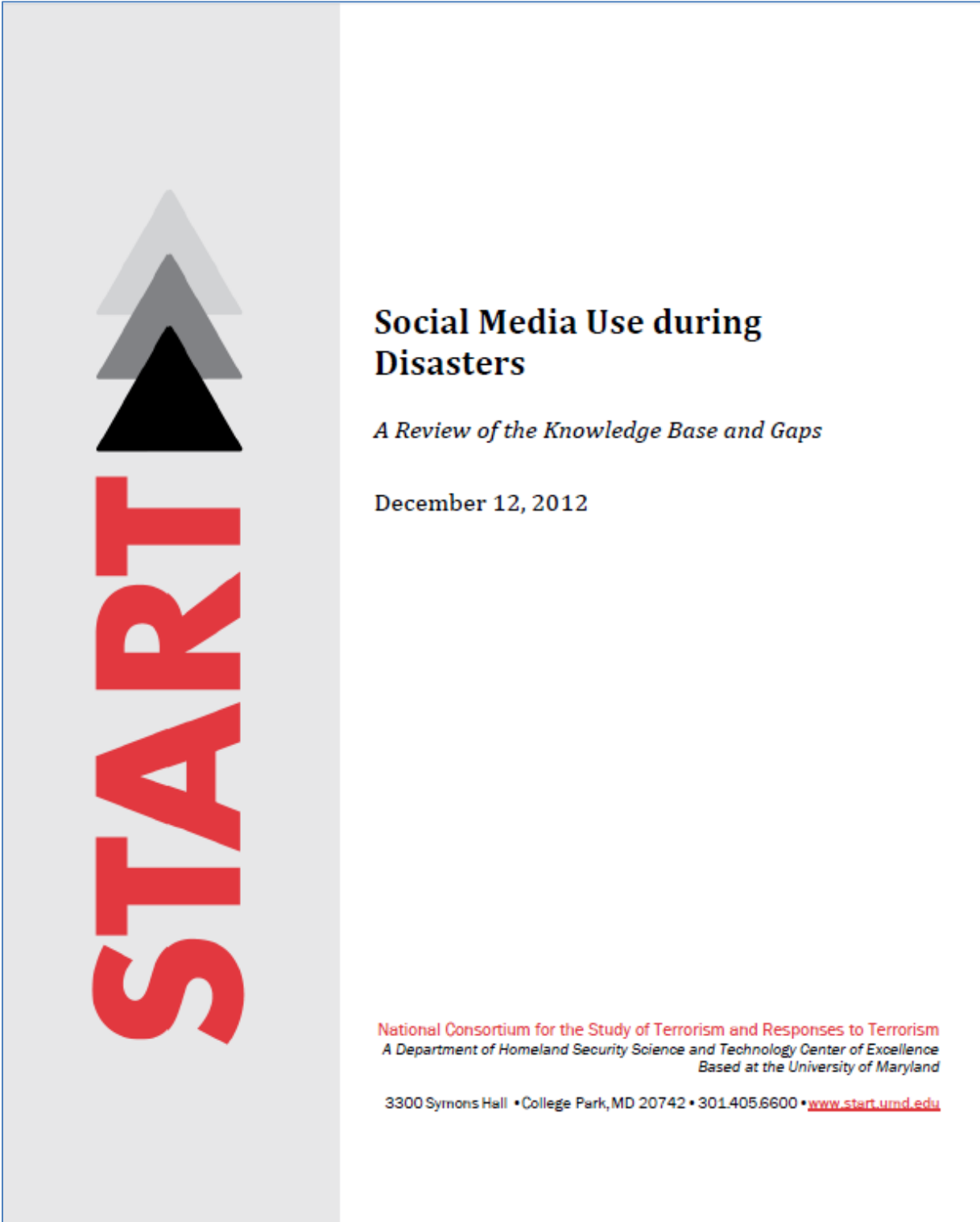
냄새 맡기
 • 보편적인 특이한 냄새!
 (후각 약화, 후각 부진) 특이한 냄새는 장시간 노출된 후 해당 냄새를 맡지 않으므로 구별하기 어렵. 경성) 또는 의의 냄새, 특이한 냄새, 귀찮은 냄새나 화학 물질 냄새 등 흔적하는 다른 냄새에 의해 해당 냄새가 가려지거나 숨겨져서 해당 냄새를 맡지 못하는 시점도 있을 수 있습니다. 또한 공압관과 유압이 특정 상태 때문에 냄새가 약해질 수 있습니다. 이러한 이러한 냄새 때문에 후각으로 감지할 수 있게 됩니다.

가스 누출이 의심되면 어떻게 해야 할까요?
 • 인명확실시요.
 • 방금, 후로, 양에, 전류 또는 기구 기기를 사용하지 않습니다.
 • 스프레이를 일으킬 수 있는 액체를 사용하지 않습니다.
 • 즉시 그 장소에서 대피하여 안전한 곳으로 이동한 후 SoCalGas의 후 7일 24시간 연결 가능한 전화 1-800-427-0471로 연락하거나 911로 전화하십시오.

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Appendix D

National Consortium for the Study of Terrorism and Responses to Terrorism. "Social Media Use during Disasters", December 12, 2012.



- **For timely information.** Social media provide real-time disaster information, which no other media can provide (Kavanaugh et al., 2011; Kodrich & Laituri, 2011). Social media can become the primary source of time-sensitive disaster information, especially when official sources provide information too slowly or are unavailable (Spiro et al., 2012). For example, during the 2007 California wildfires, the public turned to social media because they thought journalists and public officials were too slow to provide relevant information about their communities (Sutton, Palen, & Shklovski, 2008). Time-sensitive information provided by social media during disasters is also useful for officials. For example, in an analysis of more than 500 million tweets, Culotta (2010) found Twitter data forecasted future influenza rates with high accuracy during the 2009 pandemic, obtaining a 95% correlation with national health statistics. Notably, the national statistics came from hospital survey reports, which typically had a lag time of one to two weeks for influenza reporting.
- **For unique information.** One of the primary reasons the public uses social media during disaster is to obtain unique information (Caplan, Perse, & Gennaria, 2007). Applied to a disaster setting, which is inherently unpredictable and evolving, it follows that individuals turn to whatever source will provide the newest details. Oftentimes, individuals experiencing the event first-hand are on the scene of the disaster and can provide updates more quickly than traditional news sources and disaster response organization. For instance, in the Mumbai terrorist attacks that included multiple coordinated shootings and bombings across two days, laypersons were first to break the news on Twitter (Merrifield & Palenchar, 2012). Research participants report using social media to satisfy their need to have the latest information available during disasters and for information gathering and sharing during disasters (Palen, Starbird, Vieweg, & Hughes, 2010; Vieweg, Hughes, Starbird, & Palen, 2010).

Case Spotlight: 2010 Haitian Earthquake

(Livingston, 21010; McKenna, 2010; PEJ, 2010)

BACKGROUND: On January 13, 2010, a 7.0 earthquake devastated Haiti, killing more than 200,000 and displacing 1.7 million people.

MEDIA USE FINDINGS:

- **Twitter was the primary place people turned** to interact with others regarding the earthquake. 2.3 million tweets included "Haiti" or the number to text message a donation to the Red Cross between January 12 and 14.
- **Twitter, however, primarily was not used to obtain news about the disaster.** Instead, the public turned to traditional media for disaster information.
- **Disaster survivors used social media to tell their story**, which in turn drove traditional media coverage. For example, the *Wall Street Journal* created slide shows of pictures from Haiti taken and shared by disaster survivors via social media.
- **Many members of the public participated in "CrisisCamps"** across the U.S. in which volunteers organized widespread relief efforts through harnessing their technology skills and social media networks. For example, volunteers created accurate maps of devastated areas in Haiti and directed relief efforts to those areas.

Appendix E

Werner, Carrie A. "The Older Population: 2010, 2011 Census Briefs", United States Census Bureau, November 2011.

<h1>The Older Population: 2010</h1>	Issued November 2011								
<h2>2010 Census Briefs</h2>	C2010BR-09								
<p>INTRODUCTION</p> <p>The older population is an important and growing segment of the United States population.¹ In fact, more people were 65 years and over in 2010 than in any previous census.² Between 2000 and 2010, the population 65 years and over increased at a faster rate (15.1 percent) than the total U.S. population (9.7 percent). In addition to growth in the older population, pronounced growth in the male population 65 years and over occurred during the decade. The disproportionate increase in the older male population has not only contributed to the growth of the overall population 65 years and over, but has also led to a narrowing of the gap between males and females at the older ages. As larger numbers of males and females reach age 65 years and over, it becomes increasingly important to understand this population as well as the implications population aging has for various family, social, and economic aspects of society.</p> <p>Figure 1. Reproduction of the Question on Age and Date of Birth From the 2010 Census</p> <p>4. What is this person's age and what is this person's date of birth? <i>Please report babies as age 0 when the child is less than 1 year old.</i> <i>Print numbers in boxes.</i></p> <table border="1"><thead><tr><th>Age on April 1, 2010</th><th>Month</th><th>Day</th><th>Year of birth</th></tr></thead><tbody><tr><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td><td><input type="text"/></td></tr></tbody></table> <p>Source: U.S. Census Bureau, 2010 Census questionnaire.</p> <p>This report describes the older population of the United States in 2010. It is part of a series that provides an overview of the population and housing data collected from the 2010 Census. It also provides information on the age and sex structure and geographic distribution of the population 65 years and over at the national and subnational levels.³ The data for this report are based on the <i>2010 Census Summary File 1</i>, which is among the first data products released from the 2010 Census.⁴</p> <p>AGE QUESTION</p> <p>Data on the age composition of the United States and your community are derived from the 2010 Census question on age and date of birth (Figure 1).</p> <p>Information on age has been collected from respondents since the first census in 1790. The 2010 Census data on age were</p> <p>¹ In this report, the term "older" population refers to the population 65 years and over. ² Although the decennial censuses collected data on age since 1790, the specific age of a person in complete years (as of last birthday) was not collected until 1850, and data on the population 65 years and over was not published until 1870. Prior to 1850, enumerators marked people as being in a particular age group. Thus, comparisons of the population 65 years and over using historical census data are made with years in which the 65 years and over population was specifically published. In 1870, the population 65 years and over totaled 1.2 million and represented 3.0 percent of the total U.S. population. Source: <www.census.gov/prod/www/abs/decennial/1870.htm>.</p> <p>³ This report discusses data for the 50 states and the District of Columbia as well as lower levels of geography within the states. Data for Puerto Rico are not discussed in this report. ⁴ The <i>2010 Census Summary File 1</i> (SF1) contains data on age, sex, race, Hispanic origin, group quarters, relationship, tenure, and households at a variety of geographic levels down to the block level. For a detailed schedule of 2010 Census data products and release dates, visit <www.census.gov/population/www/cen2010/glance/index.htm>.</p>	Age on April 1, 2010	Month	Day	Year of birth	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<p>By Carrie A. Werner</p>
Age on April 1, 2010	Month	Day	Year of birth						
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>						
	U.S. Department of Commerce Economics and Statistics Administration U.S. CENSUS BUREAU								

Table 1.
Population 65 Years and Older by Age and Sex: 2000 and 2010

(For information on confidentiality protection, nonsampling error, and definitions, see www.census.gov/prod/cen2010/doc/sf1.pdf)

Sex and age	2000			2010			Change, 2000 to 2010	
	Number	Percentage of 65 years and over population	Percentage of U.S. total population	Number	Percentage of 65 years and over population	Percentage of U.S. total population	Number	Percentage
Both sexes, all ages	281,421,906	(X)	100.0	308,745,538	(X)	100.0	27,323,632	9.7
65 years and over	34,991,753	100.0	12.4	40,267,984	100.0	13.0	5,276,231	15.1
65 to 74 years	18,390,986	52.6	6.5	21,713,429	53.9	7.0	3,322,443	18.1
65 to 69 years	9,533,545	27.2	3.4	12,435,263	30.9	4.0	2,901,718	30.4
70 to 74 years	8,857,441	25.3	3.1	9,278,166	23.0	3.0	420,725	4.7
75 to 84 years	12,361,180	35.3	4.4	13,061,122	32.4	4.2	699,942	5.7
75 to 79 years	7,415,813	21.2	2.6	7,317,795	18.2	2.4	-98,018	-1.3
80 to 84 years	4,945,367	14.1	1.8	5,743,327	14.3	1.9	797,960	16.1
85 to 94 years	3,902,349	11.2	1.4	5,068,825	12.6	1.6	1,166,476	29.9
85 to 89 years	2,789,818	8.0	1.0	3,620,459	9.0	1.2	830,641	29.8
90 to 94 years	1,112,531	3.2	0.4	1,448,366	3.6	0.5	335,835	30.2
95 years and over	337,238	1.0	0.1	424,608	1.1	0.1	87,370	25.9
95 to 99 years	286,784	0.8	0.1	371,244	0.9	0.1	84,460	29.5
100 years and over	50,454	0.1	-	53,364	0.1	-	2,910	5.8
Median age, 65 years and over	74.5	(X)	(X)	74.1	(X)	(X)	-0.4	(X)
Male, all ages	138,053,563	(X)	49.1	151,781,326	(X)	49.2	13,727,763	9.9
65 years and over	14,409,625	41.2	5.1	17,362,960	43.1	5.6	2,953,335	20.5
65 to 74 years	8,303,274	23.7	3.0	10,096,519	25.1	3.3	1,793,245	21.6
65 to 69 years	4,400,362	12.6	1.6	5,852,547	14.5	1.9	1,452,185	33.0
70 to 74 years	3,902,912	11.2	1.4	4,243,972	10.5	1.4	341,060	8.7
75 to 84 years	4,879,353	13.9	1.7	5,476,762	13.6	1.8	597,409	12.2
75 to 79 years	3,044,456	8.7	1.1	3,182,388	7.9	1.0	137,932	4.5
80 to 84 years	1,834,897	5.2	0.7	2,294,374	5.7	0.7	459,477	25.0
85 to 94 years	1,158,826	3.3	0.4	1,698,254	4.2	0.6	539,428	46.5
85 to 89 years	876,501	2.5	0.3	1,273,867	3.2	0.4	397,366	45.3
90 to 94 years	282,325	0.8	0.1	424,387	1.1	0.1	142,062	50.3
95 years and over	68,172	0.2	-	91,425	0.2	-	23,253	34.1
95 to 99 years	58,115	0.2	-	82,263	0.2	-	24,148	41.6
100 years and over	10,057	-	-	9,162	-	-	-895	-8.9
Median age, 65 years and over	73.5	(X)	(X)	73.2	(X)	(X)	-0.3	(X)
Female, all ages	143,368,343	(X)	50.9	156,964,212	(X)	50.8	13,595,869	9.5
65 years and over	20,582,128	58.8	7.3	22,905,024	56.9	7.4	2,322,896	11.3
65 to 74 years	10,087,712	28.8	3.6	11,616,910	28.8	3.8	1,529,198	15.2
65 to 69 years	5,133,183	14.7	1.8	6,582,716	16.3	2.1	1,449,533	28.2
70 to 74 years	4,954,529	14.2	1.8	5,034,194	12.5	1.6	79,665	1.6
75 to 84 years	7,481,827	21.4	2.7	7,584,360	18.8	2.5	102,533	1.4
75 to 79 years	4,371,357	12.5	1.6	4,135,407	10.3	1.3	-235,950	-5.4
80 to 84 years	3,110,470	8.9	1.1	3,448,953	8.6	1.1	338,483	10.9
85 to 94 years	2,743,523	7.8	1.0	3,370,571	8.4	1.1	627,048	22.9
85 to 89 years	1,913,317	5.5	0.7	2,346,592	5.8	0.8	433,275	22.6
90 to 94 years	830,206	2.4	0.3	1,023,979	2.5	0.3	193,773	23.3
95 years and over	269,066	0.8	0.1	333,183	0.8	0.1	64,117	23.8
95 to 99 years	228,669	0.7	0.1	288,981	0.7	0.1	60,312	26.4
100 years and over	40,397	0.1	-	44,202	0.1	-	3,805	9.4
Median age, 65 years and over	75.2	(X)	(X)	74.8	(X)	(X)	-0.4	(X)

(X) Not applicable
 - Percentage rounds to 0.0

Sources: U.S. Census Bureau, *Census 2000 Summary File 1* and *2010 Census Summary File 1*.

Appendix F

Detailed list of items from 2009-2013 identified by ORA as “not necessary or required to operate the utility business (Employee meals, luncheons, entertainment, gift cards, employee recognition, holiday events, various corporate events, tickets to sporting events, certain employee/company dues and membership)”, originating from SoCalGas response to data request ORA-SCG-DR-042-TLG, Q17.

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013	5-Year Average Total Summary
2IN001.000	CI-Commun & Research	Non-Labor	Dues	6250000	Dues	\$0	\$0	\$0	\$0	\$250	\$741
2IN001.000	CI-Commun & Research	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$229	\$1,125	\$563	\$1,286	\$250	
2IN001.000	CI-Commun & Research	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$6,787	\$6,821	\$12,567	\$11,076	\$13,768	\$16,428
2IN001.000	CI-Commun & Research	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$86	\$813	\$3,500	\$1,887	\$2,308	
2IN001.000	CI-Commun & Research	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$5,580	\$6,646	\$3,922	\$4,110	\$2,270	\$3,324
2IN001.000	CI-Commun & Research	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$4,713	\$1,805	\$1,237	\$1,928	\$425	
2IN001.000	CI-Commun & Research	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$23	\$40	
2IN001.000	CI-Commun & Research	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$0	\$1,195	\$415	\$0	\$0	
2IN001.000	CI-Commun & Research	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$94	\$2,220	\$65	\$2,457	
2IN001.000	CI-Commun & Research	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$0	\$0	\$5,215	\$54,968	\$148	\$15,091
2IN001.000	CI-Commun & Research	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$14,949	\$0	\$0	
2IN001.000	CI-Commun & Research	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$0	\$177	\$0	\$0	\$0	
Customer Engagement & Insights Total						\$17,396	\$18,676	\$44,589	\$75,344	\$21,916	\$35,584

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013	5-Year Average Total Summary
2IN002.000	CI-Customer Assistance	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$748	\$12,104	\$6,851	\$6,762	\$11,521	\$8,532
2IN002.000	CI-Customer Assistance	Non-Labor	Dues	6250002	DUES-SOCIAL	\$0	\$0	\$1,321	\$3,353	\$0	
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$5,298	\$3,854	\$601	\$1,028	\$123	\$5,894
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$834	\$6,912	\$4,503	\$970	\$5,168	
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$24	\$0	\$25	\$132	\$0	\$1,501
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$1,053	\$389	\$273	\$667	\$393	
2IN002.000	CI-Customer Assistance	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$16	\$94	\$51	\$50	
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$2,978	\$496	\$0	\$0	\$1,049	
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$1,579	\$3,453	\$1,662	\$19,495	\$2,200	
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$15,597	\$46,810	\$7,000	\$23,969
2IN002.000	CI-Customer Assistance	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$19,946	\$21,615	(\$20,147)	\$636	\$0	
Customer Assistance Total						\$32,459	\$48,839	\$10,780	\$79,903	\$27,502	\$39,897

Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013	5-Year Average Total Summary
2IN004.000	CI-Segment Services	Non-Labor	Dues	6250001	DUES-BUSINESS/PROFES	\$20,243	\$16,812	\$19,797	\$22,157	\$43,438	\$25,108
2IN004.000	CI-Segment Services	Non-Labor	Dues	6250000	Dues	\$0	\$1,270	\$0	\$0	\$1,076	
2IN004.000	CI-Segment Services	Non-Labor	Dues	6250002	DUES-SOCIAL	\$263	\$487	\$0	\$0	\$0	
2IN004.000	CI-Segment Services	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$42,105	\$33,874	\$31,348	\$33,441	\$26,152	\$61,846
2IN004.000	CI-Segment Services	Non-Labor	Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$2,044	\$4,122	\$4,689	\$2,964	\$2,457	
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$53,829	\$49,070	\$92,291	\$56,088	\$65,447	
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220062	SRV-FOOD-MAINT (CBS)	\$0	\$0	\$0	\$0	\$65	\$7,852
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$538	\$2,285	\$3,109	\$2,724	\$1,955	
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$324	\$260	\$352	\$1,039	
2IN004.000	CI-Segment Services	Non-Labor	Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$0	\$1,021	
2IN004.000	CI-Segment Services	Non-Labor	Events	6230540	SRV-HOLIDAY EVENTS	\$1,179	\$540	\$3,782	\$7,300	\$5,459	
2IN004.000	CI-Segment Services	Non-Labor	Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$0	(\$1,280)	
2IN004.000	CI-Segment Services	Non-Labor	Events	6130023	EMP BEN-CORP EVENTS	\$20	\$0	\$434	\$7,646	\$0	
2IN004.000	CI-Segment Services	Non-Labor	Events	6211500	MATL-SAFETY EVENT	\$573	\$0	\$0	\$0	\$0	
2IN004.000	CI-Segment Services	Non-Labor	Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$42,105	\$33,874	\$31,348	\$33,441	\$26,152	\$177,551
2IN004.000	CI-Segment Services	Non-Labor	Events	6230681	SRV-EV & TKT-CHGBK	\$92,139	\$54,477	\$38,788	\$42,811	\$50,448	
2IN004.000	CI-Segment Services	Non-Labor	Employee Luncheons	6220060	SRV-CATERING	\$53,829	\$49,070	\$92,291	\$56,088	\$65,447	
2IN004.000	CI-Segment Services	Non-Labor	Events	6220811	SRV-CUSTOMER EVENT	\$21,714	\$22,587	\$60,366	\$48,270	\$30,011	
2IN004.000	CI-Segment Services	Non-Labor	Events	6230680	SRV-EVENT & TICKETS	\$16,293	\$3,738	\$4,486	\$10,263	\$8,112	
2IN004.000	CI-Segment Services	Non-Labor	Events	6220813	SRV-SPNSR BUS & CVC	\$112,037	\$49,173	\$23,538	\$0	\$7,750	
					Segment Services Total	\$458,908	\$321,703	\$406,527	\$323,546	\$334,748	

*SoCalGas made a good faith effort to separate employee meals/ent and catering expenses with expenses used directly with customers.

ATTACHMENT G

ORA Response to SoCalGas data request SEU-ORA-DR-02



ORA

Office of Ratepayer Advocates
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544

**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: April 30, 2015
Due Date: May 14, 2015
Response Date: May 14, 2015

To: Chuck Manzuk cmanzuk@semprautilities.com 1-858-654-1782
Billie Overturf 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

Data Request No: SEU-ORA-DR-2
Exhibit Reference: ORA-13
Subject: Customer Service - Information

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 Exh. ORA-13, as shown below in a. and b., 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 Engagement & Insights on page 89, footnote 241:**
SoCalGas' 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 SoCalGas did not remove all of these costs (SoCalGas response to ORA SCG-042-TLG, Q. 18) which are incorporated into ORA's TY 2016 estimate and provides embedded funding that SoCalGas can reallocate in the TY for proposed activities (see SoCalGas response to ORA-SCG-042-TLG, Q. 17).
- b. **Customer Assistance on pages 90-91, footnote 246**
SoCalGas' 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 SoCalGas did not remove all of these costs, which are incorporated into ORA's TY 2016 estimate and provides embedded funding that SoCalGas can reallocate in the TY for proposed activities.

A.1-a: 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-042-TLG, Q.17.

As discussed in ORA's testimony on pages 89 and 90-91, 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-042-TLG, Q. 17 and Q. 18, SoCalGas did not remove all these costs. See, in response to ORA_SCG-TLG-42, Q. 17: "For example, sporting event related activities are not separately identified from other employee reimbursable 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, which is based on a five year average. This provides embedded funding that SCG can reallocate in the TY for proposed activities for its Customer Engagement & Insights and its Customer Assistance work groups.

ORA's review and analysis of SCG's 2009-2013 adjusted-recorded expenses provided in SCG's response to ORA-SCG-042-TLG, question 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, are a few examples of the type

of expenses SCG incurred between 2009-2013 that are not necessary or required to operate the utility 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.

**Customer Engagement & Insights Expenses
2009-2014 Recorded and 2016 Forecast
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SCG 2016 Forecast	ORA 2016 Forecast
Labor	\$1,265	\$1,913	\$1,846	\$1,655	\$1,542	\$1,528	\$2,459	\$1,644
Non-Labor	4,385	6,463	5,127	4,613	4,377	4,850	6,432	4,993
Total	\$5,650	\$8,376	\$6,973	\$6,268	\$5,919	\$6,378	\$8,891	\$6,637

A.1-b: See response to Q. 1-a above.

**Customer Assistance Expenses
2009-2014 Recorded and 2016 Forecast
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SCG 2016 Forecast	ORA 2016 Forecast
Labor	\$166	\$185	\$189	\$179	\$170	\$131	\$178	\$178
Non-Labor	2,225	3,368	3,431	3,403	2,664	2,314	4,075	3,018
Total	\$2,391	\$3,553	\$3,620	\$3,582	\$2,834	\$2,445	\$4,253	\$3,196

Q.2: According to Exhibit No: ORA-13 p. 89 beginning on line 2: *“SCG can also reallocate costs from completed or eliminated projects to proposed TY Activities.”*

- a. Please explain and provide examples of what costs ORA recommends be reallocated to fund proposed TY activities.

A.2: For ORA's analysis and discussion on SCG's Customer Engagement & Insights expenses, please see pages 86-89 of ORA's testimony. ORA asked SCG to provide "...documentation of costs incurred for "activities associated with coordinating information and printed information for hard to reach residential and business customers, ad campaigns, production of videos, maintaining/ updating/enhancing social media pages, maintaining/ updating/enhancing socialgas.com web and My Account, maintaining / updating/enhancing mobile applications and software, performing various customer/market research and surveys, community and customer outreach events and various one-time development and implementation costs, etc." SCG did not provide documentation for the activities as requested, so ORA was not able to compare SCG's forecast project costs to past project costs or determine which projects have been completed or eliminated. ORA assumes that SCG has at least completed some projects successfully and that those costs can be reallocated to fund new activities.

Q.3: According to Exhibit No: ORA-13 p 90, footnote 246: *"SoCalGas' 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 SoCalGas did not remove all of these costs, which are incorporated into ORA's TY 2016 estimate and provides embedded funding that SCG can reallocate in the TY for proposed activities."*

a. Please explain what ORA considers to be expenses incurred that are not necessary or required to operate the utility business.

A.3: In regards to "what ORA considers to be expenses incurred that are not necessary or required to operate the utility business", 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, are a few examples of the type of expenses SCG incurred between 2009-2013 that are not necessary or required to operate the utility 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.

END OF RESPONSE
