

**CUE DATA REQUEST**  
**CUE-SEU-DR-05**  
**UTILITIES 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
**DATE RECEIVED: FEBRUARY 15, 2018**  
**DATE RESPONDED: MARCH 2, 2018**

242. Please describe the procedures SDG&E follows if a customer fails to pay their gas service bill. Provide copies of all policies and guidelines on this subject.

- a. How does SDG&E determine that a customer has failed to pay their gas service bill?
  - i. Please define the failure to pay designation.
  - ii. Please describe the length of time between billing and failure to receive payment.
- b. What is the average length of time between a customer's failure to pay and gas service shut off?
- c. What sort of notice is provided to customers before gas service is shut off?
- d. Provide copies of all notices and scripts used.

**SDG&E's Response 242:**

SDG&E objects to this data request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the question lacks foundation. SDG&E has a limited number of customers on Gas-only service. The majority of customers have an account for both electricity and natural gas service and receive a combined natural gas and electric bill. Customers do not designate the portion of the bill they are paying if they pay less than the full amount billed. With that clarification, SDG&E responds as follows with respect to the overall bill provided to residential customers:

- a. Residential bills are past due if not paid within 19 days from the date mailed per Tariff Rule 11 section A.1. Please refer to the attachment CUE-SDGE-DR-05\_Q242\_Attachment\_Rule 11.pdf
  - i. Failure to pay is defined as payment not received within 19 days of the bill mail date.
  - ii. See response to 242, a.i.
- b. SDG&E does not track the length of time between customer eligibility for gas disconnection and the actual time to gas disconnection. As stated in Tariff Rule 11, gas service becomes eligible for disconnection 23 days after the past due date.
- c. Customers receive an initial late notice on their subsequent bill notifying them of the past due balance and an additional 48-hour notice of potential disconnection 8 days later if the past due balance is not paid. Note: SDG&E typically will disconnect the electric service and not the gas service initially.
- d. Please see attachment CUE-SDG&E-DR-05 Attachment Q242d\_Redacted for an example of the late notice printed on past due bill and also CUE-SDG&E-DR-05 Attachment Q242d\_2\_Redacted for an example of a 48-hour notice.

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243. Please describe the steps a customer must follow to resolve outstanding payments. Provide copies of all policies and guidelines on this subject.

- a. How is payment made?
  - i. Provide the web address and telephone numbers customers use to make payment.
  - ii. Provide the number of branch service centers, number of branch service center employees, and number of FTEs as of December 31 for the last fifteen years.
  - iii. Provide the number of authorized payment locations as of December 31 for the last fifteen years.
- b. Who collects these payments, SDG&E or a third-party?
  - i. Describe the procedures followed.
  - ii. If payment is made to a third-party, how does SDG&E receive notice that payment has been made?

**SDG&E's Response 243:**

A residential customer may make payments through several channels: Mail; Branch Offices; Authorized Payment Locations (APLs); using Home Banking online through their banks; online through My Account; sign up for Direct Debit; with a credit card/debit card/electronic check through third-party provider Bill Matrix; and through Pay-By-Phone.

- a. How is payment made:
  - i. To make a payment via a self-service option, the customer may visit [sdge.com/residential/pay-your-bill](http://sdge.com/residential/pay-your-bill) for online payment options or call the Bill Matrix automated system at 1-800-386-0067.
  - ii. SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds that it will answer Question 243a.ii with data covering 2012-2017 as follows:

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**SDG&E's Response 243:-Continued**

<b>Description</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Branch Locations	7	7	7	7	7	6
Branch Office Employees (headcount as of 12/31 each year)	29	30	21	23	24	22
Branch Office FTEs	27.2	28.5	23.1	21.4	25.1	22.9

- iii. SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds that it will answer Question 243a. iii and with data covering 2012-2017 as follows:

<b>Description</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Authorized Payment Locations (APL)	84	96	80	77	57	55

- b. SDG&E or a third party may collect payments.
- i. Customer payments received at an SDG&E branch office and through MyAccount are processed using an internal cashiering system. Customer payment information is updated immediately in the CIS application. Customer payments received via mail are processed using an internal system and the information is updated in the CIS application daily.
  - ii. Customer payment information is received from third-parties (APL and Bill Matrix) daily. Once an hour, APL's and Bill Matrix send SDG&E electronic files known as a "memo post" file listing all payments made in the last hour. The contents of these files are immediately updated in the CIS application and postpone any pending credit action to allow time for the payments to post.

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244. Once payment is made, is gas service automatically restored?

**SDG&E's Response 244:**

SDG&E objects to Data Request 244 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. SDG&E further objects to this data request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the question lacks foundation. SDG&E has a limited number of customers that are Gas-only service. The majority of customers have an account for both electricity and natural gas service and receive a combined natural gas and electric bill. Customers do not designate the portion of the bill they are paying if they pay less than the full amount billed. Typically, SDG&E will disconnect electric service initially, which may result in the customer's payment, before gas service would be disconnected. With that clarification, SDG&E responds as follows:

No. Gas meters do not have remote disconnect/reconnect functionality. Due to safety concerns, SDG&E must speak to the customer prior to issuing the gas reconnection order because SDG&E must have access inside the customer's home to light pilot lights and to perform safety checks.

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245. If not, what steps does the customer have to take to request that service be restored?

- a. Please describe the steps SDG&E follows from the moment the request for restored service is received until a worker is dispatched to the customer's home.
- b. Please describe the work that must be performed to restore gas service in a customer's home.
- c. What is the average length of time between the customer's request for restored service and the dispatch of a worker to their home?
  - i. Please provide copies of one typical work schedules per month for gas service reconnection for the last year.
  - ii. List the number of customers whose service is restored in 1-2 days.
  - iii. List the number of customers whose service is restored in 5 days.
  - iv. List the number of customers whose service is restored in 7 days.
  - v. List the number of customers whose service is restored in 10 days.
  - vi. List the number of customers whose service is restored in 14 days.

**SDG&E's Response 245:**

SDG&E objects to Data Request 245 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. SDG&E further objects to this data request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the question lacks foundation. SDG&E has a limited number of customers on Gas-only service. The majority of customers have an account for both electricity and natural gas service and receive a combined natural gas and electric bill. Customers do not designate the portion of the bill they are paying if they pay less than the full amount billed. Typically, SDG&E will disconnect electric service initially, which may result in the customer's payment, before gas service would be disconnected. With that clarification, SDG&E responds as follows:

If payment is made via any option besides a Branch Office location, the customer must contact our Customer Contact Center to request a cut-in service order.

- a. Gas fielded cut-in service orders (SOI) are issued to restore the service on a same day basis until 6:30 p.m on Monday through Friday and are typically completed the same day. Due to the limited number of field personnel who are available to work on these orders after normal business hours, gas fielded cut-in service orders typically are not be issued after 6:30 p.m.

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**SDG&E's Response 245:**

If a customer calls back with a payment confirmation number after 6:30 p.m. Monday through Friday, weekends and holidays, the order is typically scheduled for the next business day. The customer is required to pay before gas service is reconnected (Tariff Rule 9.B.3). Customers are also required to pay a reconnection fee and be present to allow the technician access into the residence. Once the technician arrives at the premise, the order may be completed in approximately 45 minutes to 60 minutes.

Questions 245 b and c are being responded to by witness Gwen Marelli/CSF

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245. If not, what steps does the customer have to take to request that service be restored?

a. Please describe the steps SDG&E follows from the moment the request for restored service is received until a worker is dispatched to the customer's home.

b. Please describe the work that must be performed to restore gas service in a customer's home.

c. What is the average length of time between the customer's request for restored service and the dispatch of a worker to their home?

i. Please provide copies of one typical work schedules per month for gas service reconnection for the last year.

ii. List the number of customers whose service is restored in 1-2 days.

iii. List the number of customers whose service is restored in 5 days.

iv. List the number of customers whose service is restored in 7 days.

v. List the number of customers whose service is restored in 10 days.

vi. List the number of customers whose service is restored in 14 days.

**SDG&E's Response 245:**

**All responses below refer to gas service reconnections following disconnection for non-payment.**

SDG&E objects to Data Request 245 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. SDG&E further objects to this data request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the question lacks foundation. SDG&E has a limited number of customers on Gas-only service. The majority of customers have an account for both electricity and natural gas service and receive a combined natural gas and electric bill. Customers do not designate the portion of the bill they are paying if they pay less than the full amount billed. Typically, SDG&E will disconnect electric service initially, which may result in the customer's payment, before gas service would be disconnected. With that clarification, SDG&E responds as follows:

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245.a. Responses to 245 & 245.a. are addressed in CUE SEU DR-05 Q242-245a\_246\_250.

245.b. The process below generally describes the work that must be performed by the Customer Service – Field (CS-F) technician to restore gas service in a customer's home after a customer has been disconnected for non-payment.

- (1) Upon arrival at the order, the CS-F technician determines if there is safe access to the meter.
- (2) If safe access is not available, the CS-F technician contacts the customer to gain safe access.
- (3) The CS-F technician goes to the meter and verifies that the service valve is off and locked.
- (4) Tests for electricity.
- (5) Obtains a visual read.
- (6) Surveys the Meter Set assembly for Abnormal Operating Conditions (AOC) and/or any conditions that would prevent turning the gas on
- (7) The CS-F technician corrects any AOCs within the scope of his/her qualifications.
- (8) The CS-F technician contacts the customer to inspect all gas appliances.
- (9) The CS-F technician turns the gas meter on and performs a registration check. If the registration check is good, the CS-F technician will begin pilot relights and safety check of appliances. If the registration check is above allowable limits, the CS-F technician will perform shut down of appliance pilots and perform registration check again.
- (10) All gas appliances are inspected to confirm the equipment is in safe and proper operating condition.
- (11) The CS-F technician corrects any safety issues.
- (12) For problems that are out of scope of service, the CS-F technician writes any safety notices and removes from service any unsafe appliance.
- (13) The CS-F technician documents all conditions found, left, referral made, service performed, and time of order completion.

245.c. The average gas service reconnection time following disconnection for non-payment for a residential customer during 2017 is 5.1 hours. The average gas service reconnection time measures the time span between the date the order was created and the date the order was worked.



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**SDG&E's Response 245 - Continued**

245.c.i. There was no typical work schedule specific to gas service reconnections following disconnection for non-payment in 2017, or historically.

245.c.ii to 245.c.vi The responses for Questions 245.c.ii – vi are provided in the table below.

<b>2017 Reconnection Data for Residential Customers Following Disconnection for Non-Payment</b>					
Data provided refers to the time between the date the order was created and the date the order was worked					
<b>Question</b>	<b>245.c.ii</b>	<b>245.c.iii</b>	<b>245.c.iv</b>	<b>245.c.v</b>	<b>245.c.vi</b>
No. of Days	1 – 2 days	3 – 5 days	6 – 7 days	8 – 10 days	11 – 14 days
No. of Orders	88	0	0	0	0

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246. Please provide the number of Customer Service Representatives employed by SDG&E who work on gas service reconnection as of December 31 for the last fifteen years.

**SDG&E's Response 246:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 246 with data covering 2012-2017. The table below represents the number of Energy Services Specialists (ESS), formerly known as CSR's, as of December 31 of each year.

<b>Year</b>	<b>CSR FTE</b>
2012	147
2013	157
2014	136
2015	129
2016	148
2017	143

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247. Please provide the number of Customer Service Representatives who work on gas service reconnection employed as of February 1, 2018.

- a. How many of these Customer Service Representatives are capable of assisting Spanish speaking customers?
- b. How many of these Customer Service Representatives are capable of assisting Chinese speaking customers?
- c. How many of these Customer Service Representatives are capable of assisting other non-English speaking customers?
- d. Please list all languages that Customer Service Representatives are capable of assisting.

**SDG&E's Response 247:**

All SDG&E Energy Service Specialists (ESSs) (formerly known as CSRs) are trained to handle both electric and gas services including gas service reconnection; there are no distinctions between an electric ESS and a gas ESS. The number of ESSs employed as of February 1, 2018 was 147.

- a. Thirty-seven (37) Spanish-speaking ESSs can directly assist Spanish speaking customers without interpreters from the Language Line Services.
- b. There are currently zero Chinese-speaking ESS. However, all ESSs can assist Chinese speaking customers via Language Line Services interpreters.
- c. One Vietnamese-speaking ESS can directly assist Vietnamese speaking customers without interpreters from the Language Line Services.
- d. As of February 21, 2018, through Language Line Services, customers can be assisted in 254 languages. Some languages may not be available at the time of the call. Listed below are the languages offered.

Acholi	Duala	Jamaican Patois	Mbay	Sicilian
Afar	Dutch	Japanese	Mien	Sinhala
Afrikaans	Dzongkha	Jarai	Mirpuri	Slovak
Akan	Edo	Javanese	Mixteco	Slovene
Akateko	Ekegusii	Jingpho	Mizo	Soga
Albanian	Estonian	Jinyu	Mnong	Somali
Amharic	Ewe	Juba Arabic	Mongolian	Soninke
Anuak	Farsi	Jula	Moroccan	Sorani
Apache	Fijian	Kaba	Arabic	Spanish
Arabic	Fijian Hindi	Kamba	Mortlockese	Sudanese Arabic
Armenian	Finnish	Kanjobal	Napoletano	Sunda
Assyrian	Flemish	Kannada	Navajo	Susu
Azerbaijani	French	Karen	Nepali	Swahili

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Bahasa	French Canadian	Kashmiri	Ngambay	Swedish
Bahdini	Fukienese	Kayah	Nigerian Pidgin	Sylhetti
Bahnar	Fulani	Kazakh	Norwegian	Tagalog
Bajuni	Fuzhou	Kham	Nuer	Taiwanese
Bambara	Ga	Khana	Nupe	Tajik
Bantu	Gaddang	Khmer	Nyanja	Tamil
Barese	Gaelic-Irish	K'iché	Nyoro	Telugu
Basque	Gaelic-Scottish	Kikuyu	Ojibway	Thai
Bassa	Garre	Kimiiru	Oromo	Tibetan
Belorussian	Gen	Koho	Pampangan	Tigré
Bemba	Georgian	Korean	Papiamento	Tigrigna
Benaadir	German	Krahn	Pashto	Toishanese
Bengali	German Penn.	Krio	Plautdietsch	Tongan
Berber	Dutch	Kunama	Pohnpeian	Tooro
Bosnian	Gheg	Kurmanji	Polish	Trique
Bravanes	Gokana	Kyrgyz	Portuguese	Turkish
Bulgarian	Greek	Laotian	Portuguese	Turkmen
Burmese	Gujarati	Latvian	Brazilian	Tzotzil
Cantonese	Gulay	Liberian Pidgin	Portuguese Cape	Ukrainian
Catalan	Gurani	English	Verdean	Urdu
Cebuano	Haitian Creole	Lingala	Pugliese	Uyghur
Chaldean	Hakka China	Lithuanian	Pulaar	Uzbek
Chamorro	Hakka Taiwan	Luba-Kasai	Punjabi	Vietnamese
Chaochow	Hassaniyya	Luganda	Putian	Visayan
Chin Falam	Hausa	Luo	Quechua	Welsh
Chin Hakha	Hawaiian	Maay	Quichua	Wodaabe
Chin Mara	Hebrew	Macedonian	Rade	Wolof
Chin Matu	Hiligaynon	Malay	Rakhine	Wuzhou
Chin Senthang	Hindi	Malayalam	Rohingya	Yemeni Arabic
Chin Tedim	Hindko	Maltese	Romanian	Yiddish
Chipewyan	Hmong	Mam	Rundi	Yoruba
Chuukese	Hunanese	Mandarin	Russian	Yunnanese
Cree	Hungarian	Mandinka	Rwanda	Zapoteco
Croatian	Icelandic	Maninka	Samoan	Zarma
Czech	Igbo	Manobo	Sango	Zo
Danish	Ilocano	Marathi	Seraiki	Zyphe
Dari	Indonesian	Marka	Serbian	
Dewoin	Inuktitut	Marshallese	Shanghainese	
Dinka	Italian	Masalit	Shona	
	Jakartanese		Sichuan Yi	

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248. What is the average length of time that a customer waits on the phone before speaking with a Customer Service Representative?

For Weekdays:

- a. Please provide the average wait time from 8:00 am until 5:00 pm.
- b. Please provide the average wait time from 5:00 pm until 7:00 pm.
- c. Please provide the average wait time from 7:00 pm until 9:00 pm.
- d. Please provide the average wait time from 9:00 pm until 12:00 am.

For Weekends and Holidays:

- e. Please provide the average wait time from 8:00 am until 5:00 pm.
- f. Please provide the average wait time from 5:00 pm until 7:00 pm.
- g. Please provide the average wait time from 7:00 pm until 9:00 pm.
- h. Please provide the average wait time from 9:00 pm until 12:00 am.

**SDG&E's Response 248:**

The average length of time that a customer waits on the phone before speaking with an ESS was 270 seconds measured from July 2016 through June 2017.

For Weekdays:

- a. The average wait time from 8:00 am until 5:00 pm was 278 seconds
- b. The average wait time from 5:00 pm until 7:00 pm was 345 seconds
- c. The average wait time from 7:00 pm until 9:00 pm was 263 seconds
- d. The average wait time from 9:00 pm until 12:00 am was 41 seconds

For Weekends and Holidays:

- e. The average wait time from 8:00 am until 5:00 pm was 212 seconds
- f. The average wait time from 5:00 pm until 7:00 pm was 123 seconds
- g. The average wait time from 7:00 pm until 9:00 pm was 49 seconds
- h. The average wait time from 9:00 pm until 12:00 am was 53 seconds

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249. What is the average length of time that a customer waits on the phone before speaking with a Customer Service Representative regarding gas service reconnection?

For Weekdays:

- a. Please provide the average wait time from 8:00 am until 5:00 pm.
- b. Please provide the average wait time from 5:00 pm until 7:00 pm.
- c. Please provide the average wait time from 7:00 pm until 9:00 pm.
- d. Please provide the average wait time from 9:00 pm until 12:00 am.

For Weekends and Holidays:

- e. Please provide the average wait time from 8:00 am until 5:00 pm.
- f. Please provide the average wait time from 5:00 pm until 7:00 pm.
- g. Please provide the average wait time from 7:00 pm until 9:00 pm.
- h. Please provide the average wait time from 9:00 pm until 12:00 am.

**SDG&E's Response 249:**

Gas service reconnection is not separately tracked from other electric and gas start/stop/transfer services. The average length of time that a customer waits on the phone before speaking with an ESS regarding the category of calls tracked as electric and gas start/stop/transfer services was 279 seconds measured from July 2016 through June 2017.

For Weekdays:

- a. The average wait time from 8:00 am until 5:00 pm was 269 seconds
- b. The average wait time from 5:00 pm until 7:00 pm was 394 seconds
- c. The average wait time from 7:00 pm until 9:00 pm was 444 seconds
- d. The average wait time from 9:00 pm until 12:00 am was 7 seconds

For Weekends and Holidays:

- e. The average wait time from 8:00 am until 5:00 pm was 287 seconds
- f. The average wait time from 5:00 pm until 7:00 pm was 193 seconds
- g. The average wait time from 7:00 pm until 9:00 pm was 35 seconds
- h. The average wait time from 9:00 pm until 12:00 am was 9 seconds

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250. Please report the Level of Service standard for Customer Service Representatives as of December 31 for the last fifteen years.

**SDG&E's Response 250:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 250 with data covering 2012-2017. The table below represents the Level of Service provided by ESS, formerly known as CSR's, as of December 31 for each year.

<b>Year</b>	<b>CSR LOS</b>
2012	65.0%
2013	68.9%
2014	65.3%
2015	27.6%
2016	25.4%
2017	37.2%

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**DATE RESPONDED: MARCH 2, 2018**

251. Please report the number of Gas Service Technicians employed by SDG&E as of December 31 for the last fifteen years.

**SDG&E's Response 251:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding, and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 251 with data covering 2012-2017.

The table below provides the number of Gas Service Technicians employed by SDG&E as of December 31 of each year from 2012 to 2017.

<b>No. of Gas Service Technicians as of December 31 for each year (Headcount)</b>		
<b>Year</b>	<b>Service Technician</b>	<b>Service Technician Seasonal</b>
2012	84	14
2013	88	13
2014	83	0
2015	86	9
2016	74	9
2017	78	10



**CUE DATA REQUEST**  
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**DATE RECEIVED: FEBRUARY 15, 2018**  
**DATE RESPONDED: MARCH 2, 2018**

252. Please report the number of residential customers as of December 31 for the last fifteen years.

**SDG&E's Response 252:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding, and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 252 with data covering 2012-2017.

The table below provides the total number of residential customers as of December 31 of each year from 2012 to 2017.

<b>No. of Total Residential Customers as of December 31 for each year</b>	
<b>Year</b>	<b>Total Residential Customers</b>
2012	1,242,152
2013	1,249,227
2014	1,256,091
2015	1,264,244
2016	1,271,638
2017	1,280,858

**CUE DATA REQUEST**  
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**DATE RECEIVED: FEBRUARY 15, 2018**  
**DATE RESPONDED: MARCH 2, 2018**

253. Please report the number of Field Collectors employed by SDG&E as of December 31 for the last fifteen years.

**SDG&E's Response 253:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding, and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 253 with data covering 2012-2017.

The table below provides the number of Field Collection employees employed by SDG&E as of December 31 of each year from 2012 to 2017.

<b>No. of Field Collection Employees as of December 31 for each year</b>	
<b>Year</b>	<b>Headcount</b>
2012	44
2013	42
2014	13
2015	10
2016	10
2017	9

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254. Please provide all internal email communications on the subjects addressed in the proceeding data requests from February 1, 2017 until February 1, 2018.

**SDG&E's Response 254:**

SDG&E objects to Data Request 254 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. Consequently, SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is no longer relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Further, SDG&E objects to this request as the burden, expense, and intrusiveness of the request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence under Rule 10.1 of the Commission's Rules of Practice and Procedure. Finally, SDG&E objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine.

**CUE DATA REQUEST**  
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**DATE RESPONDED: MARCH 2, 2018**

255. To the extent not provided in the previous data request, please provide all internal email communications on gas service reconnection requests from February 1, 2017 until February 1, 2018.

**SDG&E's Response 255:**

SDG&E objects to Data Request 255 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. Consequently, SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is no longer relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Further, SDG&E objects to this request as the burden, expense, and intrusiveness of the request outweighs the likelihood that the information sought will lead to the discovery of admissible evidence under Rule 10.1 of the Commission's Rules of Practice and Procedure. Finally, SDG&E objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine.

**CUE DATA REQUEST  
CUE-SEU-DR-05  
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SDG&E RESPONSE  
DATE RECEIVED: FEBRUARY 15, 2018  
DATE RESPONDED: MARCH 2, 2018**

256. Provide any internal analysis and studies or outside analysis and studies in SDG&E's possession that provide other utilities benchmarking data on gas service reconnection in the year prior to the filing of this GRC Application.

**SDG&E's Response 256:**

For the year 2016 (i.e., the year prior to the filing of the 2019 GRC Application), SDG&E does not have any internal analysis and studies or outside analysis and studies that provide other utilities' benchmarking data associated with gas service reconnections following disconnection for non-payment.

**CUE DATA REQUEST**  
**CUE-SEU-DR-05**  
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257. Provide any plans to change company processes that are expected to increase or decrease the average time to reconnect gas service for customers.

**SDG&E's Response 257:**

SDG&E objects to this Request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division. Subject to and without waiving this objection, SDG&E responds as follows:

SDG&E has no plans to change company processes that will affect the average time to reconnect gas service for customers following disconnection for nonpayment.

**CUE DATA REQUEST**  
**CUE-SEU-DR-05**  
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**DATE RECEIVED: FEBRUARY 15, 2018**  
**DATE RESPONDED: MARCH 2, 2018**

258. Please provide all company policies on gas service reconnection for the last fifteen years along with any metrics showing whether these policies have been met in practice.

**SDG&E's Response 258:**

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding, and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SDG&E in developing its forecasts. SDG&E further objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the request is premature to the extent it seeks data related to the Company's reconnection of gas service after disconnection for non-payment. As reflected in the Supplemental Testimony of Jerry D. Stewart, the Company will be shortly filing a motion to remove the reconnection sub-issue from the 2019 GRC. SDG&E-18-S at 1, FN2. Specifically, the Company objects that the sub-issue outlined in Scoping Memo Paragraph 3.2 (f), "whether changes are needed to the gas reconnection process for gas customers," is more appropriately addressed by the Commission in a statewide proceeding, and that it is already being addressed through the Energy Division.

Subject to and without waiving the foregoing objection, SDG&E responds as follows answering Question 258 covering 2012-2017.

There are no current company policies or metrics specific to gas service reconnections following disconnection for non-payment.