

Company: Southern California Gas Company (U 904 G)
Proceeding: 2019 General Rate Case
Application: A.17-10-007/008 (cons.)
Exhibit: SCG-219

SOCALGAS

REBUTTAL TESTIMONY OF MICHAEL H. BALDWIN

(CUSTOMER SERVICES – OFFICE OPERATIONS)

JUNE 18, 2018

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



TABLE OF CONTENTS

| | | |
|------|--|----|
| I. | SUMMARY OF DIFFERENCES | 1 |
| II. | INTRODUCTION | 1 |
| | A. TURN..... | 4 |
| | B. CUE..... | 5 |
| | C. SCGC | 5 |
| III. | REBUTTAL TO PARTIES’ O&M PROPOSALS..... | 6 |
| | A. Non-Shared Services O&M | 6 |
| | 1. Disputed Cost Customer Contact Center (CCC) Operations..... | 6 |
| | a. ORA Customer Contact Center Operations..... | 6 |
| | b. TURN Customer Contact Center Operations | 6 |
| | c. CUE Customer Contact Center and My Account..... | 12 |
| | d. CUE Customer Contact Center..... | 12 |
| | 2. Customer Contact Center Support | 13 |
| | a. ORA Customer Contact Center Support..... | 13 |
| | b. TURN Customer Contact Center Support | 15 |
| | 3. Branch Offices and Authorized Payment Locations (APL) | 16 |
| | a. ORA Branch Offices and APLs..... | 17 |
| | b. TURN Branch Offices and APLs | 17 |
| | 4. Billing Services..... | 19 |
| | a. ORA Billing Services | 19 |
| | b. TURN Billing Services..... | 19 |
| | 5. Credit and Collections Postage..... | 20 |
| | a. ORA Credit and Collections Postage..... | 20 |
| | b. TURN Credit and Collections Postage | 20 |
| | 6. Remittance Processing Postage..... | 21 |
| | a. ORA Remittance Processing Postage | 21 |
| | b. TURN Remittance Processing Postage..... | 21 |
| | 7. Other Office Operations and Technology..... | 24 |
| | a. ORA Other Office Operations and Technology | 24 |
| | b. TURN Other Office Operations and Technology..... | 24 |
| | 8. Measurement Data Operations..... | 25 |
| | a. ORA Measurement Data Operations | 25 |
| | b. TURN Measurement Data Operations..... | 25 |

| | | |
|-----|---|-----|
| B. | Shared Services O&M | 26 |
| 1. | Disputed Cost..... | 26 |
| a. | ORA | 26 |
| b. | TURN..... | 26 |
| i. | Major Markets Credit and Collections – 2200-0354 | 26 |
| C. | Uncollectible Rate..... | 27 |
| IV. | REBUTTAL TO PARTIES’ IT CAPITAL PROPOSALS | 29 |
| V. | CONCLUSION..... | 30 |
| | | |
| | APPENDIX A – Special Investigations Clerk Job Description..... | A-1 |
| | APPENDIX B – Response to TURN Data Request: TURN-SEU-062 Question 13..... | B-1 |
| | APPENDIX C – First Quartile Consulting Benchmarking Report..... | C-1 |
| | APPENDIX D – Response to SCGC Data Request: SCGC-SCG-DR05 Question 5.1.1..... | D-1 |
| | APPENDIX E – TNS Customer Experience Survey April 2018 | E-1 |
| | APPENDIX F – Glossary of Terms..... | F-1 |

**SOCALGAS REBUTTAL TESTIMONY OF MICHAEL H. BALDWIN
(CUSTOMER SERVICES – OFFICE OPERATIONS)**

I. SUMMARY OF DIFFERENCES

TABLE MHB-1

**Comparison of SoCalGas and Intervenors
TY 2019 Estimated Operating & Maintenance (O&M) Expenses**

| TOTAL O&M - Constant 2016 (\$000) | | | | |
|--|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 92,422 | 89,789 | -2,633 | |
| ORA | 92,422 | 89,622 | -2,800 | -167 |
| TURN | 92,422 | 85,628 | -6,794 | -4,157 |

Note: CUE made proposals without specified dollar amounts, so they cannot be reflected in this table.

TABLE MHB-2

**Comparison of SoCalGas and Intervenors
TY 2019 Estimated IT Capital Expenses**

| Constant 2016 (\$000) | 2017 | 2018 | 2019 | Total |
|------------------------------|-------------|-------------|-------------|--------------|
| SOCALGAS | 13,190 | 12,412 | 23,663 | 49,265 |
| ORA | 13,190 | 12,412 | 23,663 | 49,265 |
| TURN | 13,190 | 12,412 | 23,663 | 49,265 |
| SCGC | 13,190 | 12,412 | 24,663 | 50,265 |

II. INTRODUCTION

This rebuttal testimony regarding Southern California Gas Company’s (SoCalGas) request for Customer Services – Office Operations (CSOO) addresses the following testimony from other parties:

- The Office of Ratepayer Advocates (ORA) as submitted by Ms. Crystal Yeh.¹

¹ April 13, 2018, Prepared Direct Testimony of Crystal Yeh, Report on the Results of Operations for San Diego Gas & Electric Company, Southern California Gas Company, Test Year 2019, General Rate Case, SoCalGas Customer Services – Field & Meter Reading; Office Operations; Information; and Technologies, Policies & Solutions, Ex. ORA-17 (Ex. ORA-17 (Yeh)).

- 1 • The Utility Reform Network (TURN), as submitted by Mr. William Marcus.²
- 2 • TURN as submitted by Ms. Hayley Goodson.³
- 3 • Coalition for Utility Employees (CUE) as submitted by Javier Salas⁴ and Belinda
- 4 Moreno.⁵
- 5 • Southern California Generation Coalition (SCGC) as submitted by Catherine E
- 6 Yap.⁶

7 Please note that the fact that I may not have responded to every issue raised by others in
8 this rebuttal testimony, does not mean or imply that SoCalGas agrees with the proposal or
9 contention made by these or other parties. The forecasts contained in SoCalGas' direct
10 testimony are based on sound estimates of its revenue requirements at the time of testimony
11 preparation.

12 CSOO provides revenue cycle services to meet the needs of SoCalGas' diverse customer
13 base served through 5.8 million active meters. CSOO activities includes the following non-
14 shared services:

- 15 • Customer Contact Center Operations & Support;
- 16 • Branch Offices and Authorized Payment Locations (APL);
- 17 • Billing Services;
- 18 • Measurement Data Operations;
- 19 • Credit and Collections; and
- 20 • Credit and Collections Postage.

² May 14, 2018, Prepared Direct Testimony of William Perea 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, Ex. TURN-03 (Ex. TURN-03 ((Marcus)).

³ May 14, 2018, Prepared Direct Testimony of Hayley Goodson, Addressing the Proposals of San Diego Gas & Electric Company and Southern California Gas Company in Their Test Year 2019 General Rate Case Related to Uncollectibles, Ex. TURN-04 (Ex. TURN-04 (Goodson)).

⁴ May 14, 2018, Opening Testimony of Javier Salas On Behalf of the Coalition of California Utility Employees, Ex. CUE (Ex. CUE (Salas)).

⁵ May 14, 2018, Opening Testimony of Belinda Moreno On Behalf of the Coalition of California Utility Employees, Ex. CUE (Ex. CUE (Moreno)).

⁶ May 14, 2018, Direct Testimony of Catherine E. Yap on Behalf of the Southern California Generation Coalition, Ex. SCGC (Ex. SCGC (Yap)).

- 1 • Remittance Processing (Bill Printing);
- 2 • Remittance Processing Postage;
- 3 • Customer Services Office Operations Technology & Support;
- 4 • Uncollectable Rate; and
- 5 • Business Justification for CSOO IT Capital Projects.

6 In addition, CSOO has the following Shared Services:

- 7 • Major Markets Credit and Collections CC 2200-0354
- 8 • Payment Processing CC 2200-0355
- 9 • Manager of Remittance Processing CC 2200-2247

10 The CSOO cost forecasts support the Company's goal of providing safe, reliable and
11 efficient gas service to customers, as well as complying with all federal, state and local
12 regulations. The CSOO cost forecasts also support SoCalGas' focus on safety as well as
13 continuous improvement, cost efficiency and customer experience. Several cost forecasts
14 include reductions due to our Fueling Our Future (FOF) initiative designed to identify and
15 implement more efficient operational improvements.

16 **ORA**

17 ORA issued its report on CSOO on April 13, 2018.⁷ The following is a summary of
18 ORA's position:

- 19 • ORA accepted the CSOO forecast for all O&M functional areas except the
20 Customer Contact Center Support group in which they recommend a reduction of
21 \$167,000 in labor from SoCalGas Test Year (TY) 2019 request of \$9,024,000.
- 22 • ORA does not oppose SoCalGas' business justifications for its proposed CSOO
23 capital projects.
- 24 • ORA does not oppose SoCalGas' request to increase the authorized uncollectible
25 expense rate.
- 26 • ORA did not address the reasonableness of the costs recorded to the Energy Data
27 Request Memorandum Account (EDRMA).

⁷ Ex. ORA-17 (Yeh).

1 **A. TURN**

2 TURN submitted testimony on May 14, 2018.⁸ The following is a summary of TURN's
3 positions:

- 4 • For the Customer Contact Center (200000.000), TURN recommends a reduction
5 of \$2.335 million for labor expenses and a \$27,000 reduction in non-labor expenses from
6 a total SoCalGas TY 2019 request of \$29,872,000 (labor and non-labor).
- 7 • For the Customer Contact Center Support (200001.000), TURN recommends a
8 reduction of \$239,000 in labor expenses and a \$232,000 reduction in non-labor expenses
9 from a total SoCalGas TY 2019 request of \$9,024,000 (labor and non-labor).
- 10 • For Branch Offices (200002.000), TURN recommends a reduction of \$82,000 in
11 labor expenses and \$45,000 in non-labor expenses from a total SoCalGas TY 2019
12 request of \$12,012,000 (labor and non-labor).
- 13 • For Billing Services (200003.000), TURN recommends a reduction of \$415,000
14 in labor expenses and an increase of \$93,000 in non-labor expenses from a total
15 SoCalGas TY 2019 request of \$6,265,000 (labor and non-labor).
- 16 • For Credit and Collections Postage (200004.001), TURN recommends a
17 reduction of \$44,000 in NSE non-labor expenses from a SoCalGas TY 2019 request of
18 \$995,000.
- 19 • For Remittance Processing Postage (200005.001), TURN recommends a
20 reduction of \$276,000 in NSE non-labor expenses from a SoCalGas TY 2019 request of
21 \$13,812,000.
- 22 • For Other Office Operations and Technology (200006.000), TURN recommends
23 a reduction of \$474,000 in labor expenses and an increase of \$154,000 in non-labor
24 expenses from a total SoCalGas TY 2019 request of \$3,180,000 (labor and non-labor).
- 25 • For Measurement Data Operations (200007.000), TURN recommends a
26 reduction of \$113,000 in labor from a SoCalGas TY 2019 request of \$1,043,000.
- 27 • For Major Markets Credit and Collections (2200-0354), TURN recommends a
28 reduction of \$124,000 in labor from a SoCalGas TY request of \$1,604,000.

⁸ Ex. TURN-03 (Marcus); Ex. TURN-04 (Goodson).

- 1 • TURN does not oppose SoCalGas' non-shared services requests for Credit and
2 Collections \$4,100,000 and Remittance Processing \$3,994,000.
- 3 • TURN does not oppose SoCalGas' shared services requests for Payment
4 Processing \$3,511,000 or Manager of Remittance Processing \$377,000.
- 5 • TURN does not oppose SoCalGas' IT Capital Project business justifications.
- 6 • For Uncollectible Rate TURN proposed a 10-year rolling average whereas
7 SoCalGas proposed a static five-year average.

8 TURN bases most of its reduction recommendations on 2017 adjusted recorded expense
9 and associated activity levels versus SoCalGas' 2017 forecasts. When using this methodology,
10 TURN fails to take into consideration earlier than expected benefits achieved from FOF
11 initiatives, unfilled vacancies caused by the Voluntary Retirement Enhancement Program
12 (VREP), and other circumstances.

13 **B. CUE**

14 The Coalition of California Utility Employees submitted testimony on May 14, 2018.
15 The following is a summary of CUE's position(s):

16 Witness Javier Salas,⁹ asserts that the Level of Service (LOS) in the Customer Contact
17 Center is inadequate but makes no specific recommendation as to how many additional
18 Customer Service Representatives (CSRs) would be required nor what the appropriate LOS
19 should be. He makes no specific dollar requests.

20 Witness Belinda Moreno¹⁰ asserts that without a mandatory LOS, customers safety,
21 billing and service requests are not adequately being addressed. She also states that Spanish-
22 speaking customers are unable to use My Account. She makes no specific dollar requests.

23 **C. SCGC**

24 The Southern California Generation Coalition submitted testimony on May 14, 2018.¹¹
25 The following is a summary of SCGC's position(s):

⁹ Ex. CUE (Salas) at 6-7.

¹⁰ Ex. CUE (Moreno) at 4.

¹¹ Ex. SCGC (Yap).

1 Witness Catherine Yap asks that SoCalGas be required to spend an additional \$1,000,000
 2 of capital to expand the Integrated Customer Data Analytics (ICDA) program.¹²

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

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

5 **TABLE MHB-3**

6 **Comparison of SoCalGas and Intervenors**
 7 **TY 2019 Estimated Non-Shared Service O&M Expenses**

| NON-SHARED O&M - Constant 2016 (\$000) | | | |
|---|-----------------------------|---------------------------|---------------|
| | Base Year 2016 | Test Year 2019 | Change |
| SOCALGAS | 87,019 | 84,297 | -2,722 |
| ORA | 87,019 | 84,130 | -2,889 |
| TURN | 87,019 | 80,260 | -6,759 |
| CUE | No specific dollar proposal | | |

8
 9 **1. Disputed Cost Customer Contact Center (CCC) Operations**

10 **TABLE MHB-4**

11 **Comparison of SoCalGas and Intervenors**
 12 **TY 2019 Estimated Call Center Operations O&M Expenses**

| CCC-Operations – 200000.000 Constant 2016 (\$000) | | | | |
|--|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 30,143 | 29,872 | -271 | |
| ORA | 30,143 | 29,872 | -271 | 0 |
| TURN | 30,143 | 27,510 | -2,633 | -2,362 |

13
 14 **a. ORA Customer Contact Center Operations**

15 ORA accepts SoCalGas’ forecast for Customer Contact Center Operations.

16 **b. TURN Customer Contact Center Operations**

17 TURN disagrees with SoCalGas’ forecast based upon a number of factors:

18 **Actual call volumes received are lower than forecast.**

19 TURN states in its testimony that:

¹² Ex. SCGC (Yap) at 3; 22.

1 There is a serious trend toward cost reductions in SoCal's call center
2 operations that SoCal is not capturing in its analysis. The total number of
3 calls is going down rapidly. The number of calls handled by Customer
4 Service Representatives (CSRs) is going down even faster, as the
5 Interactive Voice Response (IVR) unit takes more and more calls.¹³

6 TURN also states:

7 SoCalGas CSRs have already answered fewer phone calls in the last year
8 than SoCal forecasts for 2019.¹⁴

9 TURN bases the above statements on the SoCalGas 2019 forecast number of calls
10 compared with the actual number of phone calls received in the 2017 and the first three months
11 of 2018. Furthermore, TURN projects that these reductions will continue into TY 2019 and
12 reduces our forecast by \$2.335 million.

13 **TURN's approach to forecasting TY 2019 SoCalGas call volume is flawed and does**
14 **not consider many factors that impact forecasted staffing requirements for CSRs.**

15 SoCalGas acknowledges that the actual number of calls received in 2017 of 5,079,591
16 was lower than our forecast of 5,191,111 by 111,520 calls or 2.4%. What is not included in
17 TURN's analysis are the reasons why the call patterns occurred. Two major factors impacted the
18 call reduction as well as the increase in the IVR usage. The first factor that impacted call
19 reduction was weather. See Table MHB-5 below that shows that 2017 had fewer Heating Degree
20 Days (HDD) than 2016, which indicates warmer weather. Warmer weather generally results in
21 lower customer bills, which contributed to a reduction of billing calls by 43,000 compared to
22 Base Year (BY) 2016. When factoring in the billing call reduction, our call volume was only
23 **1.3%** lower than projected.

24 IVR calls were 131,051 more than forecast. In 2017, IVR calls increased by 138,528 due
25 to the additional functionality that allowed customers to be transferred to Bill Matrix, our third-
26 party provider of credit card/debit card/e-check through the IVR. Prior to this additional
27 functionality, customers would just call Bill Matrix directly. So, TURN just assumes, without
28 any basis in fact, that IVR usage will continue to increase at this high rate.
29

¹³ Ex. TURN-03 (Marcus) at 13 (emphasis added).

¹⁴ Ex. TURN-03 (Marcus) at 14 (emphasis added).

1
2

TABLE MHB-5
Ten Year History of HDD¹⁵

| Year | CYC-HDD |
|--------------------|----------------|
| 2008 | 1,403 |
| 2009 | 1,335 |
| 2010 | 1,463 |
| 2011 | 1,550 |
| 2012 | 1,266 |
| 2013 | 1,294 |
| 2014 | 743 |
| 2015 | 919 |
| 2016 | 1,055 |
| 2017 | 998 |
| 10 Yr. Avg. | 1,202 |

3
4

Average Handle Time (AHT) is lower than forecast

5

Also in its testimony, TURN states

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There are two other parameters that SoCal is getting wrong. The first is the claim that Average Handle Time (the average time a CSR spends on the phone with a customer) is high and needs to rise even more for reasons of safety (capturing customers' e-mails, etc.). TURN DR 62-01h shows that this claim is wrong. Average handle time went down dramatically in 2017. SoCal's workpapers claim that a Fueling Our Future idea reduces AHT by 12 seconds, but a request to collect and verify e-mail addresses from customers for safety reasons added a process that takes an extra 15 seconds that SoCal claims to have implemented in July 2017, and a process to encourage paperless billing added another 2.6 Seconds, implemented late in 2017. So, in SoCal's analysis, there should be an extra 5.6 seconds of handle time relative to 2016 by the end of 2017 when all of these changes were implemented.¹⁶

19
20

TURN states that SoCalGas planned to implement a FOF idea that would increase 15 seconds in AHT. What TURN is referring to is a Risk Assessment Mitigation Phase (RAMP)

¹⁵ National Weather Service. The cycle year HDDs are SoCalGas system-wide numbers calculated as the sum of the monthly system-wide billing cycle HDDs. These monthly system-wide billing cycle HDDs are calculated as the sum of daily system-wide HDDs, weighted by the percentage of cycles active on each day.

¹⁶ Ex. TURN-03 (Marcus) at 14-15 (emphasis added).

1 program.¹⁷ SoCalGas indicated in our workpapers that we planned to implement the RAMP
2 program in July of 2017 that would result in additional talk time with the customers to update
3 customer contact information during all calls. However, SoCalGas delayed this program because
4 SoCalGas was unable to track (timestamp) whether that request for the customer's contact
5 information was duplicative of previous requests. Feedback from customers indicated that we
6 had requested their email address and other update information in multiple phone conversations.
7 This redundant request irritated many customers who had recent previous contacts with
8 SoCalGas. Customer Information System (CIS) enhancements are being developed to track and
9 timestamp the customer contact attributes from previous customer contacts. Many FOF ideas
10 require additional Information Technology programming resources. Typically, these finite
11 resources require prioritization and are allocated and scheduled accordingly. These system
12 enhancements will be implemented in late 2018 or early 2019. Also, the addition of 2.6 seconds
13 of AHT attributed to the promotion of paperless billing was originally scheduled to be
14 implemented in early October but was delayed until December 8, 2017. As shown in TURN's
15 Figure 2¹⁸ (re-published as Figure MHB-1 below), after the implementation of the paperless bill
16 promotion, AHT did increase in January and will continue to increase in 2018 due to the ongoing
17 paperless promotion and also the RAMP mitigation program. The projected full year impact in
18 2018 for paperless promotion is an additional 10 seconds plus 15 seconds more for the RAMP
19 mitigation program. These additional twenty-five seconds account for thirty-three FTEs that
20 TURN does not recognize. Since TURN was unaware of these delays in the timing of increases
21 in AHT, their recommended reduction due to 2017 actual decreased AHT cannot be used to
22 justify their recommended reductions and should be ignored.

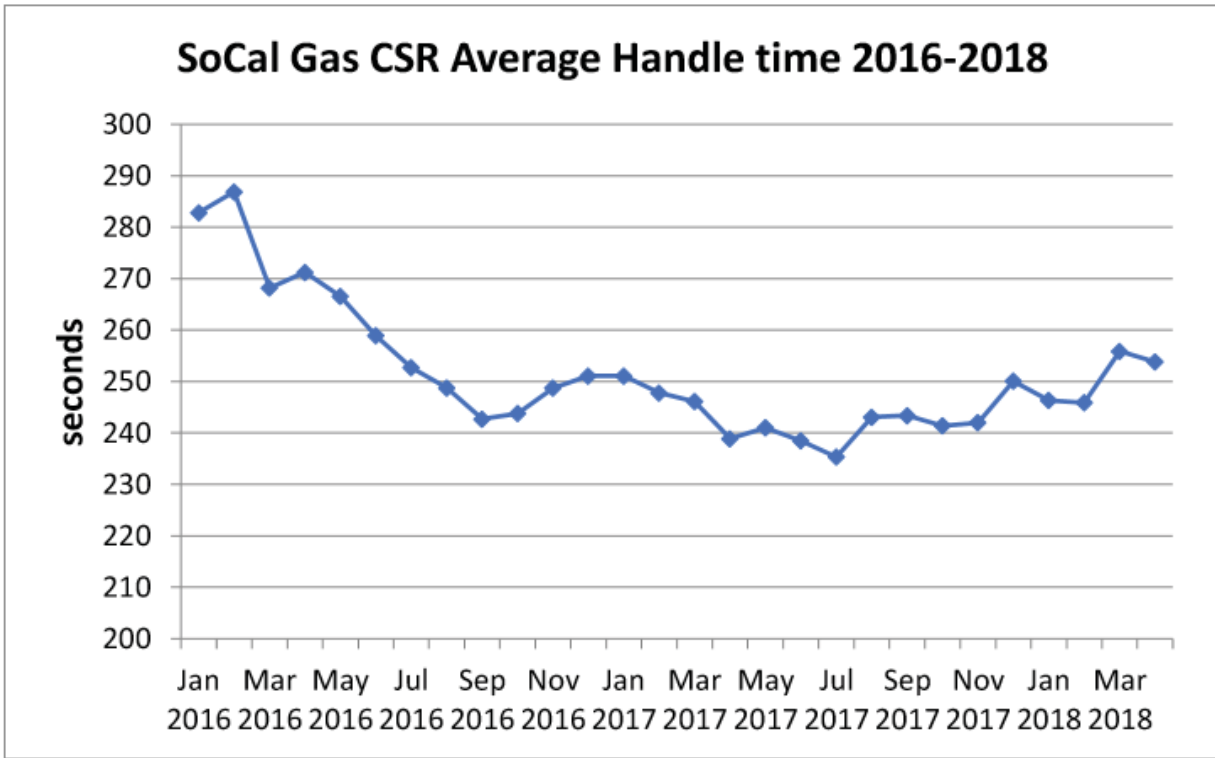
¹⁷ December 2017, Revised Workpapers to Prepared Direct Testimony of Michael H. Baldwin on Behalf of Southern California Gas Company, Ex. SCG-19-WP-R (Ex. SCG-19-WP-R (Baldwin)) at 8.

¹⁸ Ex. TURN-03 (Marcus) at 15.

1

FIGURE MHB-1

Figure 2: SoCalGas CSR Average Handle Time (seconds) 2016-2018



2

Number of Calls taken by Full Time Equivalent CSR

3

In its testimony, TURN states:

4

The second area for reduction is the number of calls taken by a Full-Time Equivalent CSR. SoCal claims that a CSR can take 13,524 calls per year, which is 3.89% fewer calls than the 2017 value of 14,071 calls per year.¹⁹

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TURN is correct. In 2017, the average number of calls handled by each Full-Time Equivalent (FTE) CSR was 14,071. However, TURN failed to recognize that SoCalGas' forecast already accounts for changes in productivity, in the form of an AHT reduction. In 2017, SoCalGas included an FOF reduction of 10 seconds in AHT, equal to a 13.2 reduction in CSR FTEs (see workpapers entry below).²⁰

¹⁹ Ex. TURN-03 (Marcus) at 16 (emphasis added).

²⁰ Ex. SCG-19-WP-R (Baldwin) at 7.

1 **FIGURE MHB-2**

2 **Ex. SCG-19-WP-R Excerpt of FOF Line Item**

2017 FOF-Ongoing -981 -7 0 -988 -13.2 1-Sided Adj TNGUYEN20181205090301480

3 **Explanation:** FOF - CCC FOF ideas Cost efficiencies related to Fueling our Future initiative. Reduction in AHT by
4 10 secs, cost reduction can be realized by eliminating unnecessary phrasing from scripts.

5 This reduction reduces the number of CSRs required and increases the average number of
6 calls the CSR can handle per year.

7 When showing changes to the CSR staffing requirements in the workpapers, SoCalGas
8 uses the BY 2016 Calls per FTE factor of 13,524 to show reduction in CSRs needed due to the
9 change in call volume, and uses a 1.32 FTEs adjustment factor for each 1 second change in
10 overall AHT. The AHT Adjustment factor for a decrease in AHT accounts for productivity
11 changes in call handling and the ability for the CSR to take additional calls. Since the projected
12 increases in AHT did not materialize in 2017, this had a temporary effect of increasing the
13 amount of calls (14,071) that each CSR could take. When you factor in the additional AHT that
14 is expected to occur in 2018, (RAMP will add 15 seconds and the full year effect of an additional
15 10 seconds for paperless promotion), the number of calls per FTE will be close to the 13,524
16 originally forecasted.

17 TURN is effectively penalizing SoCalGas for achieving FOF cost savings prior to TY
18 2019. The investment of increased AHT in 2018 and TY 2019 will support cost savings for
19 other groups, e.g., paperless billing reductions. TURN's argument to reduce SoCalGas
20 Customer Contact Center operations costs is predicated on 2017 lower CSR AHT than forecast.

21 So, to summarize, while TURN projects a 3% reduction in call volumes for 2017
22 continuing into 2018, due to weather factors, SoCalGas has shown that its call volume forecast is
23 only 1.3% below forecast. Also, TURN was unaware of the delay in anticipated AHT increases,
24 so their projection of the amount of calls that can be taken by a CSR is unsupported. Due to the
25 additional information SoCalGas has provided, the California Public Utilities Commission
26 (Commission) should adopt SoCalGas' forecast as reasonable, and TURN's proposed reduction
27 of \$2.335 million in labor and \$27,000 in non-labor should be rejected.

1 **c. CUE Customer Contact Center and My Account**

2 CUE witness Ms. Belinda Moreno states, “Since SoCalGas does not have a mandatory
3 LOS, Customers are not able to reach a CSR to take their service request, safety concerns, or to
4 address their billing questions.”²¹ She also asserts that because My Account is not available in
5 languages other than English, customers are harmed.

6 Ms. Moreno’s statement that because SoCalGas does not have a mandatory Level of
7 Service, customers aren’t able to contact a CSR is just not true. In its testimony, SoCalGas
8 targets a 60% LOS as it provides a good balance between cost and responsiveness and is
9 consistent with recent historical CSR LOS levels. Customer safety is also not at risk as 90% of
10 emergency calls are answered within 20 seconds. Her assertion that Spanish-speaking customers
11 are inconvenienced because My Account is only available in English is also not true. While My
12 Account is only available in English, CUE Witness Moreno ignores the fact that socialgas.com
13 provides a roadmap on how to navigate My Account in Spanish.²² CUE Witness Moreno does
14 not request a specific dollar amount that would be adequate to address her concerns, but,
15 regardless, her assertions are not true and should be ignored.

16 **d. CUE Customer Contact Center**

17 CUE witness Javier Salas asserts:

18 The purpose of my testimony is to support CUE’s proposal to increase
19 revenues for Customer Contact Center Operations Spending so that
20 SoCalGas can hire a greater number of Customer Service Representatives
21 (CSRs) in order to provide adequate customer service. SoCalGas is
22 forecasting a 60% LOS for the rate case period but this is insufficient.”²³
23 CUE also asserts, “SCG has a lengthy IVR message that a customer must
24 navigate before reaching a live CSR.”²⁴ “Adding a waiting period of more
25 than a minute after the IVR system has been exhausted is unreasonable
26 and inadequate service.”²⁵

²¹ Ex. CUE (Moreno) at 4.

²² <https://www.socialgas.com/pay-bill/my-account>.

²³ Ex. CUE (Salas) at 1 (emphasis added).

²⁴ Ex. CUE (Salas) at 6 (emphasis added).

²⁵ Ex. CUE (Salas) at 6 (emphasis added).

CUE Witness Salas makes vague and ambiguous claims that LOS is misleading because SoCalGas schedules more CSRs during the times that heavy call volume is expected and that the system is being manipulated. LOS is tracked on a daily basis and SoCalGas admits it schedules more CSRs during the times in which heavy call volumes are expected. Again, SoCalGas targets a 60% LOS as it provides a good balance between cost and responsiveness and is consistent with recent historical CSR LOS levels. SoCalGas proposes to add 19.7 FTEs from 2017-2019 to meet this target.

The IVR acts as a virtual traffic cop to direct calls to specific CSRs who routinely handle the type of call the customer is calling about. Without the IVR, customers would need to be transferred again to the appropriate CSR. In fact, about 35% of all customer contacts are handled by the IVR, thus requiring no live agent interaction. While CUE Witness Salas claims to be speaking for the customer, the most recent customer satisfaction survey says that for the wait time to reach a CSR, 55.3% percent of customers rate their experience as very reasonable. Similarly, 90.3% of our customers rate the IVR experience as good to excellent.²⁶ CUE Witness Salas does not request specific dollar amounts that he feels would be adequate to address his concerns.

2. Customer Contact Center Support

TABLE MHB-6

**Comparison of SoCalGas and Intervenors
TY 2019 Estimated Call Center Support O&M Expenses**

| CCC-Support - 200001.000 Constant 2016 (\$000) | | | | |
|---|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 7,782 | 9,024 | 1,242 | |
| ORA | 7,782 | 8,857 | 1,075 | -167 |
| TURN | 7,782 | 8,553 | 771 | -471 |

a. ORA Customer Contact Center Support

ORA takes issue with the TY 2019 forecast for the Customer Contact Center Support group in which SoCalGas requested \$167,000 for the funding of two additional Special Investigations representatives.

²⁶ TNS Customer Experience Survey April 2018 Survey. See Appendix E.

1 ORA states that:

2 The labor requirements for this function have been relatively steady over
3 the last two recorded years. A three-year average of the 2014 – 2016 FTE
4 count is 6.44, which is around the same as 2016. Given this information,
5 ORA concludes that SoCalGas has been able to conduct its CCC support
6 activities without having to add FTES, and opposes the requested increase
7 of \$167,000 for this function.²⁷

8 **SoCalGas disagrees with ORA for these reasons:**

9 SoCalGas requested \$167,000 to expand the capabilities of the Special Investigations (SI)
10 team to comprehensively handle customer issues, complaints, and call escalations. Special
11 Investigations representative job responsibilities involve responding to elevated customer issues
12 including formal and informal CPUC customer complaints. Please see Appendix A for the SI
13 representative job responsibilities.²⁸ Specifically, these are customer-related matters that have
14 been elevated due to complexity and/or customer impact, and SoCalGas believes that these
15 issues should be handled as quickly and efficiently as possible. Although Table MHB-7 reflects
16 that the total number of issues has fallen dramatically from 2015/2016, of which a considerable
17 number were pertaining to the Aliso Incident, Table MHB-8 shows that the number of business
18 days needed to respond to these complaints has increased, indicating the lack of available
19 workforce to respond in a timely manner to issues of increasing complexity and broader scope.

20 **TABLE MHB-7**

21 **Customer Elevated Issues**

| Calendar Year | Executive | Informal | Telephone | Formal | Grand Total |
|---------------|-----------|----------|-----------|--------|-------------|
| 2017 | 740 | 393 | 801 | 5 | 1939 |
| 2016 | 982 | 1019 | 1063 | 3 | 3067 |
| 2015 | 832 | 565 | 1079 | 2 | 2478 |
| 2014 | 706 | 344 | 797 | 0 | 1847 |

22
23

²⁷ Ex. ORA-17 (Yeh) at 14 (emphasis added).

²⁸ Southern California Gas Company – Job Profile, attached as Appendix A.

1 **TABLE MHB-8**

2 **Average Response Time to Elevated Issues**
3 **(Business Days)**

| Month | 2014 Average days to respond | 2015 Average days to respond | 2016 Average days to respond | 2017 Average days to respond |
|---------|------------------------------|------------------------------|------------------------------|------------------------------|
| Jan | 18 | 18 | 20 | 21 |
| Feb | 19 | 14 | 21 | 14 |
| Mar | 17 | 13 | 28 | 20 |
| Apr | 16 | 12 | 16 | 20 |
| May | 15 | 10 | 13 | 17 |
| Jun | 18 | 11 | 8 | 19 |
| Jul | 13 | 12 | 13 | 17 |
| Aug | 10 | 15 | 11 | 14 |
| Sep | 8 | 12 | 17 | 15 |
| Oct | 13 | 11 | 13 | 12 |
| Nov | 13 | 20 | 12 | 14 |
| Dec | 8 | 14 | 6 | 41 |
| Average | 14 | 13 | 15 | 19 |

4
5 SoCalGas believes that the number of days, on average three weeks to over a month, does
6 not provide adequate customer service. For these reasons, SoCalGas believes that funding for
7 two additional Special Investigations clerks is reasonable and should be approved.

8 **b. TURN Customer Contact Center Support**

9 As TURN states in its testimony,

10 TURN recommends a reduction to SoCal's forecast of \$471,000, resulting
11 in \$8,553,000, by analyzing 2017 spending.²⁹

12 TURN also states,

13 After examining labor spending in 2017, we use a 2017 baseline for
14 labor.³⁰ In TURN-SEU-13, SoCalGas explained that a number of new
15 positions were not filled, \$76,000 of productivity savings were brought
16 forward from 2019, and while they backfilled positions used to support the
17 Aliso Canyon activities, other employees went on extended absences.³¹

²⁹ Ex. TURN-03 (Marcus) at 18 (emphasis added).

³⁰ Ex. TURN-03 (Marcus) at 19 (emphasis added).

³¹ Ex. TURN-03 (Marcus) at 19 (emphasis added).

1 **Labor**

2 TURN’s \$471,000 reduction consists of \$239,000 in labor expenses. TURN repeatedly
3 uses actual 2017 spending as the basis for its recommendation without consideration of the
4 circumstances that impacted 2017. As TURN acknowledges above, SoCalGas provided data that
5 explained the variances in 2017, but TURN ignored this data and circumstances related to 2017
6 expenses. As SoCalGas explained in response to TURN’s Data Request-TURN-SEU-062,
7 Question 13, in 2017, SoCalGas was in the process of hiring to fill vacant positions that either
8 have now been or will soon be filled.³² Therefore, the forecasted TY 2019 labor expense request
9 represents the full annualized effect of partial 2017 labor expenses. TURN’s labor forecast
10 should be rejected because it does not consider data provided.

11 **Non-Labor**

12 TURN’s reduction consists of a \$232,000 reduction in non-labor expenses. TURN’s use
13 of a two-year average to forecast TY 2019 non-labor expenses is flawed because it understates
14 the actual expected 2017 annual expenses. Non-labor expenses in 2017 include a one-time credit
15 of \$270,000 from SoCalGas’ telecommunications provider because of reliability problems that
16 occurred in March of 2017. TURN did not include an adjustment for this one-time credit in their
17 calculations. TURN cherry-picked the year of comparison that gave them the low-number result
18 they sought. For these reasons, SoCalGas believes that the Commission should reject TURN’s
19 arguments and adopt the SoCalGas forecast.

20 **3. Branch Offices and APL**

21 **TABLE MHB-9**

22 **Comparison of SoCalGas and Intervenors**
23 **TY 2019 Estimated Branch Office & APL O&M Expenses**

| Branch Offices - 200002.000 Constant 2016 (\$000) | | | | |
|--|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 11,592 | 12,012 | 420 | |
| ORA | 11,592 | 12,012 | 420 | 0 |
| TURN | 11,592 | 11,885 | 293 | -127 |

24

³² TURN-SEU-DR-062, Question 13, attached as Appendix B.

1 **a. ORA Branch Offices and APLs**

2 ORA does not oppose SoCalGas’ forecast for Branch Offices and APLs.

3 **b. TURN Branch Offices and APLs**

4 TURN recommends a reduction of \$127,000 (\$82,000 labor, and \$45,000 non-labor) to
5 SoCalGas’ forecast.

6 SoCalGas disagrees with TURN on the items described below:

7 In its testimony, TURN states “TURN uses a 2017 baseline for labor but recommends a
8 two-year average for non-labor expenses in light of the more significant 2017 decline relative to
9 the forecast and adds the incremental spending for 2018-2019.”³³

10 **Labor**

11 For the existing 44 branch offices, SoCalGas utilizes a process known as “optimal
12 staffing”. Optimal staffing incorporates all full-time Customer Contact Representative (CCR)
13 positions in the branch offices and utilizes part-time cashier staff to fill in behind full-time
14 positions for vacation, sickness, jury duty and other time-off reasons. In addition, part-time
15 cashiers are scheduled at the busier offices during peak payment days. In other words,
16 SoCalGas’ scheduled staffing levels reflect the forecasted volume of daily customer transactions.
17 Staffing levels vary by office and days of the month.

18 In 2017, SoCalGas offered a VREP. Twelve (12) employees accepted the program and
19 retired from the company on May 1, 2017. All twelve branch office employees were in the
20 highest job classifications and at the top of the pay scale. Their replacements all entered the job
21 at the lowest level of the pay scale. For eight of the twelve vacancies, applicants were required
22 to complete approximately six months of pass/fail training. During training, the lowest level job
23 classification – a cashier – filled behind the vacant positions until all positions were
24 filled. Below are the calculations to estimate the labor reductions that resulted:

25 Customer Contact Representative hourly rate: \$36.27

26 Cashier hourly rate: \$28.70

27 The difference in the hourly rate between the CCR and Cashier is \$7.57 * 1040 hours (6
28 months training) * 8 CCR vacancies = \$62,982.40. Also during 2017, SoCalGas experienced
29 temporary office closures due to plumbing issues, which required office closures for time periods

³³ Ex. TURN-03 (Marcus) at 21 (emphasis added).

1 ranging from one to three weeks. During these times, full-time employees were redeployed to
2 other offices and part-time staff was furloughed resulting in additional reduced spending. This
3 explains the reduced spending in 2017. However, these replacement employees will qualify for
4 pay raises based on their time in the job and will reach top pay by TY 2019. So, TURN's
5 recommendation to use 2017 as a baseline for labor expenses is flawed and ignores the
6 effects/impacts of partial year 2017 retirements (VREP), lower pay scales of new branch office
7 employees, and temporary office closures. The Commission should adopt the SoCalGas' Branch
8 Office & APL labor forecast.

9 **Non-labor**

10 In its testimony, TURN states:

11 TURN also notes that SoCal has not explained why it is reasonable to
12 expect that all of the incremental ADA activities it lists in its workpapers
13 will be recurring annually, aside from the addition of an ADA coordinator.
14 For instance, 'certification of a large chain of stores that had previously
15 self-certified' would seem to be a one-time activity.³⁴

16 All incremental non-labor expenses related to the Americans with Disabilities Act (ADA)
17 activities are recurring. Included in the incremental non-labor expenses is support for the new
18 ADA Coordinator for ongoing training (material, supplies, travel and lodging expenses). Also
19 included are expenses related to the production of braille and large font bills provided by a third-
20 party vendor and are ongoing. In addition, SoCalGas will now undertake ADA compliance
21 certifications that previously were performed by Walmart. All (82) Walmart stores in our
22 service territory are APLs. In the past, Walmart provided a self-certification document ensuring
23 that all its stores were ADA compliant. Beginning in 2017, Walmart stopped issuing these self-
24 certifications. In our agreement with the Center for Accessible Technologies (CforAT),
25 SoCalGas is required, on an annual basis, to randomly select 10% of our entire existing 362 APL
26 locations for ADA compliance audit and to certify ADA compliance of all new locations.
27 Clearly, these additional ADA certifications are not a one-time event as TURN stated above. For
28 these reasons, TURN's proposal should be rejected and the Commission should fully fund
29 SoCalGas' Branch Office and APL non-labor request.

³⁴ Ex. TURN-03 (Marcus) at 21 (emphasis added) (citations omitted).

1 **4. Billing Services**

2 **TABLE MHB-10**

3 **Comparison of SoCalGas and Intervenors**
4 **TY 2019 Estimated Billing Services O&M Expenses**

| Billing Services - 200003.000 Constant 2016 (\$000) | | | | |
|--|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 6,968 | 6,265 | -703 | |
| ORA | 6,968 | 6,265 | -703 | 0 |
| TURN | 6,968 | 5,942 | -1,026 | -323 |

5
6 **a. ORA Billing Services**

7 ORA does not oppose the SoCalGas Billing Services forecast.

8 **b. TURN Billing Services**

9 TURN states “TURN uses a base year 2017 for the entire activity with no additional FOF
10 reductions. Labor spending in 2017 was already \$415,000 below the 2019 forecast.”³⁵

11 Labor spending in 2017 was impacted by the VREP for both management and non-
12 management employees. Three management employees accepted the program and retired from
13 the company in November 2016. One vacancy resulting from retirement was not filled until
14 August 2017, which resulted in a labor shortfall of \$70,125. A second employee was not
15 replaced until October 2017, which resulted in a labor shortfall of \$84,600. The third employee
16 was replaced immediately with no gap in between retirement and labor expenses related to the
17 replacement. The delay in replacing these employees resulted in a \$154,725 lower 2017 labor
18 adjusted recorded expense.

19 In 2017, SoCalGas also offered a VREP for represented employees. Nine represented
20 employees accepted the program and retired from the company on March 1, 2017. The delay in
21 replacing these employees resulted in a lower 2017 labor expense of \$342,086.

22 The impact of the VREP explains the reduced spending in 2017. However, the labor
23 expenses SoCalGas requested will be needed in 2018 and beyond. TURN’s recommendation to
24 use 2017 as a baseline for labor expenses does not align with the actual circumstances of VREP
25 retirements and the time required to fill vacant positions. In addition, TURN recommends an

³⁵ Ex. TURN-03 (Marcus) at 22 (emphasis added).

1 increase in non-labor of \$93,000. SoCalGas does not need this non-labor increase for an
2 increase in contract workers. For these reasons, TURN's proposal should be rejected and the
3 Commission should adopt SoCalGas' Billing Services forecast as reasonable.

4 **5. Credit and Collections Postage**

5 **TABLE MHB-11**

6 **Comparison of SoCalGas and Intervenors**
7 **TY 2019 Estimated Credit and Collections Postage O&M Expenses**

| Credit and Collections Postage - 200004.001 Constant 2016 (\$000) | | | |
|--|---------------------------|---------------------------|---------------|
| | Base Year 2016 | Test Year 2019 | Change |
| SOCALGAS | 995 | 995 | 0 |
| ORA | 995 | 995 | 0 |
| TURN | 995 | 951 | -44 |

8
9 **a. ORA Credit and Collections Postage**

10 ORA does not oppose SoCalGas' Credit and Collections Postage forecast.

11 **b. TURN Credit and Collections Postage**

12 TURN recommends a \$44,000 reduction. SoCalGas disagrees with TURN on the item
13 described below. In its testimony, TURN states:

14 TURN recommends a two-year average of 2016-2017 and a spending
15 level of \$951,000 to reflect SoCalGas' lower cost and the reduced number
16 of notices mailed by SoCalGas in 2017, while also recognizing that
17 seasonal factors and economic conditions influence the number of
18 collections notices mailed.³⁶

19 TURN recognized that collections notices are impacted by seasonal conditions. TURN
20 arbitrarily chose a year, 2017, with abnormally warm winter conditions to include as part of their
21 average methodology in recommending a \$44,000 reduction. SoCalGas' TY 2019 forecast was
22 developed when BY 2016 was the latest historical data point. SoCalGas could not expect or
23 anticipate that 2017 would be an abnormally warm winter just as TURN has no way of knowing
24 that TY 2019 will be as warm. SoCalGas' requested expenses for TY 2019 are predicated on
25 normal weather patterns and as such, recommends the Commission reject TURN's proposal and
26 accept SoCalGas' Credit and Collections Postage forecast.

³⁶ Ex. TURN-03 (Marcus) at 23-24 (emphasis added).

1 **6. Remittance Processing Postage**

2 **TABLE MHB-12**

3 **Comparison of SoCalGas and Intervenors**
4 **TY 2019 Estimated Remittance Processing Postage O&M Expenses**

| Remittance Processing Postage - 200005.001 Constant 2016 (\$000) | | | |
|---|---------------------------|---------------------------|---------------|
| | Base Year 2016 | Test Year 2019 | Change |
| SOCALGAS | 17,011 | 13,812 | -3,199 |
| ORA | 17,011 | 13,812 | -3,199 |
| TURN | 17,011 | 951 | -3,475 |

5
6 **a. ORA Remittance Processing Postage**

7 ORA does not oppose SoCalGas' forecast for Remittance Processing Postage.

8 **b. TURN Remittance Processing Postage**

9 TURN recommends an additional \$276,000 reduction in addition to the already reduced
10 forecast of \$3,199,000.

11 SoCalGas disagrees with TURN on the item described below. In its testimony, TURN
12 states:

13 SoCalGas spent \$17,011,000 on postage in 2016. It forecast declines to
14 \$16,340,000 in 2017, \$15,087,000 in 2018 and \$13,812,000 in 2019.”³⁷

15 TURN also states:

16 In the last half of 2017, there were fewer paper bills than SoCalGas
17 forecast for 2019. Based on all this information, TURN forecasts that the
18 paper bill volume is likely to be less than SoCal has projected by about
19 2%, and thus forecasts a 2% decline in postage costs at current rates . . .
20 TURN therefore forecasts postage costs of \$13,576,000, a \$276,000
21 reduction to SoCal's forecast.³⁸

22 Remittance Processing Postage expenses include the cost of mailing customer bills,
23 notices, letters and other customer correspondence. Customers moving from paper bills and
24 adopting electronic bills reduces postage expenses. SoCalGas has one of the highest paperless
25 adoption rates for utilities in the country according to First Quartile Consulting benchmarking

³⁷ Ex. TURN-03 (Marcus) at 24 (emphasis added).

³⁸ Ex. TURN-03 (Marcus) at 25 (emphasis added).

1 data.³⁹ In the past, SoCalGas achieved this adoption rate by advertising on the outside of the
2 mailing envelopes, bill inserts and onserts. Onserts are advertising printed on a separate bill
3 page. SoCalGas adds 160,000 to 180,000 new paperless customers per year through these
4 marketing methods.

5 FOF initiatives are expected to add a total of 1 million new paperless accounts by the end
6 of TY 2019. SoCalGas' postage forecast includes FOF committed cost savings. The typical
7 marketing methods described above will not achieve FOF postage expense savings. SoCalGas'
8 My Account website was redesigned in September 2017, to highlight the paperless option
9 available to our customers. This resulted in modest increases for October through November.
10 Also in October 2017, SoCalGas discovered a flaw in the way our data query was counting
11 paperless customers resulting in a 4,888-one-time addition.

12 The primary focus to increase paperless bill adoption was for the Customer Contact
13 Center to offer electronic billing when customers call to start new service. In addition, SoCalGas
14 also implemented a capital project to pre-enroll all non-My Account customers. When a
15 customer is asked if they want to participate in electronic billing and provides an affirmative
16 response, an email is immediately sent to the customer with a link to My Account. At this point,
17 the customer billing data is immediately presented to the customer. The customer is asked to
18 provide a User ID and password to view their bill online through My Account. This pre-
19 enrollment function was implemented in December 2017.

20 The first five full months from January 2018 to May 2018 of paperless bill enrollment is
21 presented in Table MHB-13 below. As of year-to-date (YTD), May 2018, an average of 7,848
22 more customers per month are enrolling than in the same period of 2017. Extrapolating YTD
23 May 2018 monthly average of paperless additions throughout the remainder of 2018 through
24 2019, provides encouraging results, but still falls short of SoCalGas' FOF 1,000,000 additional
25 paperless goal by 46,271 customers. At \$4.56 per customer at today's postage rates, this leaves a
26 \$211,000 shortfall from SoCalGas' TY 2019 forecast. So, TURN's proposal to reduce
27 SoCalGas' TY 2019 postage forecast by \$276,000 is unreasonable and is illogical, given the
28 results from 2017 and early 2018. In fact, SoCalGas is falling behind on FOF reductions for
29 postage expenses. Reducing SoCalGas TY 2019 postage expenses will further exacerbate the

³⁹ First Quartile Consulting Benchmarking Study (October 2, 2017) at 23. Also, *see* Appendix C.

1 shortfall. For these reasons, the Commission should reject TURN’s proposal and accept
 2 SoCalGas’ Remittance Processing Postage forecast.

3 **TABLE MHB-13**
 4 **Paperless Bill Enrollment**

| Month | 2016 | 2017 | 2018 | 2019 (est.) |
|--------------|-------------|-------------|-------------|--------------------|
| January | 15,356 | 17,846 | 28,467 | 28,467 |
| February | 15,457 | 16,422 | 22,411 | 22,411 |
| March | 15,647 | 16,667 | 25,437 | 25,437 |
| April | 8,539 | 11,954 | 20,628 | 20,628 |
| May | 5,507 | 14,200 | 19,233 | 19,233 |
| Average | 12,101 | 15,417 | 23,265 | |

| Month | 2016 | 2017 | 2018 (est.) | 2019 (est.) |
|--------------|-------------|-------------|------------------------------------|--------------------|
| June | 10,712 | 10,440 | 18,288 | 18,288 |
| July | 12,527 | 14,476 | 22,324 | 22,324 |
| August | 15,606 | 16,037 | 23,835 | 23,835 |
| September | 15,294 | 17,166 | 25,014 | 25,014 |
| October | 18,446 | 25,566 | 25,556 | 25,556 |
| November | 13,748 | 19,293 | 19,293 | 19,293 |
| December | 15,359 | 26,908 | 26,908 | 26,908 |
| Annual Total | 161,976 | 206,965 | 277,394 | 277,394 |
| | | | Projected 4- Year Total | 953,729 |

1 7. **Other Office Operations and Technology**

2 **TABLE MHB-14**

3 **Comparison of SoCalGas and Intervenors**
 4 **TY 2019 Estimated Other Office Operations and Technology O&M Expenses**

| Other Office Operations and Technology - 200006.000 Constant 2016 (\$000) | | | |
|--|---------------------------|---------------------------|---------------|
| | Base Year 2016 | Test Year 2019 | Change |
| SO CAL GAS | 2,065 | 3,180 | 1,115 |
| ORA | 2,065 | 3,180 | 1,115 |
| TURN | 2,065 | 2,859 | 794 |

5
6 **a. ORA Other Office Operations and Technology**

7 ORA does not oppose SoCalGas' Other Office Operations and Technology forecast.

8 **b. TURN Other Office Operations and Technology**

9 TURN recommends a reduction of \$321,000. SoCalGas disagrees with TURN on the
 10 item described below: In its testimony, TURN states:

11 TURN forecasts \$2,859,000 (a reduction of \$320,000), including
 12 \$474,000 less in labor expenses and \$154,000 more in non-labor expenses.
 13 .. TURN recommends using 2017 as a base year for labor but
 14 recommends providing half of the increment from 2017 recorded to 2019
 15 forecast to recognize that SoCal may add some positions, particularly
 16 when 2017 still contains vacancies.⁴⁰

17 **Labor**

18 TURN's proposal for the Other Office Operations and Technology group, using 2017
 19 recorded labor activity plus half the incremental request in TY 2019, does not accurately reflect
 20 the group's costs due to partial vacancies in 2017. TURN's proposal fails to consider the
 21 group's full staffing levels required, as the group has had partial vacancies that were especially
 22 evident in 2016 and 2017. During these years, the group was impacted by vacancies due to
 23 disabilities, employee movement, retirements and temporary deployment of resources to support
 24 Aliso. Five of the nine vacant positions identified for BY 2016 were filled later than planned in
 25 2017 due to an extended hiring process necessary to find individuals with the required
 26 qualifications for these jobs. Five additional vacancies occurred in 2017, with some of those
 27 positions filled in early 2018. A full staffing level is required in TY 2019 to support the

⁴⁰ Ex. TURN-03 (Marcus) at 26 (emphasis added).

1 increasing number of customer technology application functions at SoCalGas. For these reasons,
 2 TURN's recommendation should be rejected and the Commission should adopt SoCalGas' other
 3 office operations and technology labor forecast.

4 **Non-Labor**

5 TURN's non-labor proposal, using a six-year average, should not be adopted because the
 6 Other Office Operations and Technology group is planning to reduce its spending on outside
 7 vendors and contractors to support its operations. SoCalGas plans to return to full staffing levels
 8 as described above. SoCalGas is requesting \$206,000⁴¹ (\$154,000 below TURN's proposal)
 9 because the requested forecast is a more accurate representation of its spending needs for TY
 10 2019. For these reasons, TURN's recommendation should be rejected and the Commission
 11 should adopt SoCalGas' Other Office Operations and Technology non-labor forecast.

12 **8. Measurement Data Operations**

13 **TABLE MHB-15**

14 **Comparison of SoCalGas and Intervenors**
 15 **TY 2019 Estimated Measurement Data Operations O&M Expenses**

| Measurement Data Operations - 200007.000 Constant 2016 (\$000) | | | | |
|---|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 1,314 | 1,043 | -271 | |
| ORA | 1,314 | 1,043 | -271 | 0 |
| TURN | 1,314 | 929 | -385 | -114 |

16 **a. ORA Measurement Data Operations**

17 ORA does not oppose the SoCalGas Measurement Data Operations forecast.

18 **b. TURN Measurement Data Operations**

19 TURN recommends a reduction of \$114,000. SoCalGas disagrees with TURN on the
 20 item described below.

21 TURN's proposal for the Measurement Data Operations (MDO) group using BY 2016
 22 labor activity does not accurately reflect the group's costs due to partial year vacancies during
 23 2017. TURN's proposal fails to consider the group at full staffing levels, as the group has had
 24 partial vacancies that were especially evident in 2016 and 2017. During these years, the group
 25

⁴¹ Ex. SCG-19-WP-R (Baldwin) at 93.

1 was impacted by vacancies due to disabilities, employee movement as well as three
 2 (3) individuals who participated in the Company’s VREP program in 2017. TY 2019 forecasted
 3 labor expenses of \$925,000 is consistent with the historical average prior to BY 2016 (*i.e.*,
 4 2012 – 2015) where the average labor amount was about \$922,000.⁴²

5 For the reasons stated above, TURN’s recommendation should be rejected and the
 6 Commission should adopt SoCalGas’ Measurement Data Operations forecast.

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

8 **TABLE MHB-16**

9 **Comparison of SoCalGas and Intervenors**
 10 **TY 2019 Estimated Shared Services O&M Expenses**

| SHARED SEVICES O&M – Constant 2016 (\$000) | | | | |
|---|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 5,403 | 5,492 | 89 | |
| ORA | 5,403 | 5,492 | 89 | 0 |
| TURN | 5,403 | 5,368 | 35 | -124 |

11 **1. Disputed Cost**

12 **a. ORA**

13 ORA does not oppose SoCalGas’ forecast for Shared Services O&M.

14 **b. TURN**

15 TURN recommends a \$124,000 reduction to cost center 2200-0354.

16 **i. Major Markets Credit and Collections – 2200-0354**

17 TURN did not agree with SoCalGas’ forecast for Major Markets Credit and Collections
 18 2200-0354.
 19

⁴² Ex. SCG-19-WP-R (Baldwin) at 105.

1 **TABLE MHB-16**

2 **Comparison of SoCalGas and Intervenors**
3 **TY 2019 Estimated Shared Major Markets Credit and Collections O&M Expenses**

| Major Markets Credit and Collections – 2200-0354 | | | | |
|---|---------------------------|---------------------------|---------------|---------------------------------|
| | Base Year 2016 | Test Year 2019 | Change | Change from SoCalGas |
| SOCALGAS | 1,608 | 1,604 | -4 | |
| ORA | 1,608 | 1,604 | -4 | 0 |
| TURN | 1,608 | 1,480 | -128 | -124 |

4
5 TURN recommends a reduction of \$124,000. SoCalGas disagrees with TURN on the
6 item described below.

7 TURN’s proposal for the Major Market Credit and Collections (MMCC) group, a three-
8 year average (2015-2017) for labor, does not accurately reflect the group’s costs because 2015
9 and 2017 had partial vacancies during those years. The MMCC group filled one of the vacancies
10 in late 2017. Therefore, the 2017 recorded amount that TURN used only reflected a partial
11 year’s labor instead of an annualized amount. As a result, TURN’s proposal fails to consider the
12 group at full staffing levels. SoCalGas’ proposal, adjusted base year (2016), should be adopted
13 because it reflects the group at full staffing levels.

14 For the reasons stated above, TURN’s recommendation should be rejected and the
15 Commission should adopt SoCalGas’ forecast for the MMCC shared services cost center.

16 **C. Uncollectible Rate**

17 TURN asserts that:

18 TURN recommends that the Commission adopt a new approach for both
19 utilities. TURN proposes a ten-year rolling average of historical
20 uncollectible rates, starting with 2008-2017 for the test year, with
21 adjustments to occur annually by Advice Letter. This is the same
22 approach adopted by the Commission for PG&E in each of its last two
23 GRCs.⁴³

24 SoCalGas thanks TURN for bringing PG&E’s approach to our attention. SoCalGas
25 agrees with TURN that a 10-year rolling average is a reasonable approach⁴⁴ and asks the

⁴³ Ex. TURN-04 (Goodson) at 3 (emphasis added).

⁴⁴ SoCalGas notes that Table 1, on page 4 of Ms. Goodson’s testimony, inaccurately updated the rates in 2021, which reflect 2009-2018 as the means to calculate the average uncollectable rate. The 2021 rate should reflect 2010-2019 as the means to calculate the average uncollectable rate. See Ex. TURN-04

1 Commission to adopt this approach for SoCalGas. SoCalGas agrees with TURN when they
2 state, “a rolling average would mitigate some of the risk to the utilities and their ratepayers from
3 changing economic conditions, which impact the uncollectible rate, by allowing the rate to be
4 annually updated. Similarly, it would capture changes in the utilities’ credit and collections
5 activities, including those that may be required by the Commission in response to SB 598, which
6 also impact the uncollectible rate. These regular adjustments would prevent historic data from
7 becoming stale in an area of volatile costs.”⁴⁵

8 However, SoCalGas is concerned when TURN later states, “This ratemaking treatment
9 creates an incentive for the utility to apply aggressive credit and collection requirements and
10 pursue service shut-offs as a means of minimizing uncollectable amounts. SDG&E and
11 SoCalGas explain the motivation to ‘start the credit process early’ to avoid write-offs: ‘If the
12 credit process doesn’t start early enough, then a customer’s overdue balance continues to grow
13 and therefore their energy bill is higher over time.’ . . . ‘[A] larger energy bill means that a greater
14 proportion of customers will have difficulty paying and therefore increases the likelihood of an
15 uncollectable expense. Adopting a rolling average approach to the uncollectable rate, with
16 annual updates, would help lessen the potential for conflicting incentives.’⁴⁶

17 SoCalGas believes that TURN is incorrect and mischaracterizes SoCalGas’ statement.
18 As reflected in my Supplemental Testimony,⁴⁷ SoCalGas has observed that reducing the number
19 of customers disconnected results in a higher average arrears balance for customers, which
20 ultimately decreases the probability of customer repayment or a successful payment
21 arrangement. In other words, and as shown by the data and analysis presented in section IV⁴⁸ of
22 my Supplemental Testimony, informing customers quickly of a potential disconnection for
23 nonpayment can increase the reconnection rate, as customers have a difficult time paying large

(Goodson) at 4, Table 1: Comparison Between SDG&E’s and SoCalGas’s Uncollectible Rates and
TURN’s.

⁴⁵ Ex. TURN-04 (Goodson) at 3 (emphasis added).

⁴⁶ Ex. TURN-04 (Goodson) at 9-10 (emphasis added) (citations omitted).

⁴⁷ February 7, 2018, SoCalGas Supplemental Testimony of Michael H. Baldwin, Customer Service Office
Operations, Ex. SCG-19-S (Ex. SCG-19-S (Baldwin)).

⁴⁸ Ex. SCG-19-S (Baldwin) at MHB-6.

1 past due balances.⁴⁹ Furthermore, TURN has not made it clear how their proposed methodology
2 “would help lessen the potential for conflicting incentives” to the extent such an incentive
3 actually exists.

4 **IV. REBUTTAL TO PARTIES’ IT CAPITAL PROPOSALS**

5 **TABLE MHB-17**

6 **Comparison of SoCalGas and Intervenors**
7 **TY 2019 Estimated IT Capital Expenses**

| TOTAL IT CAPITAL - Constant 2016 (\$000) | | | | | |
|---|-------------|-------------|-------------|--------------|-----------------|
| | 2017 | 2018 | 2019 | Total | Variance |
| SOCALGAS | 13,190 | 12,412 | 23,663 | 49,265 | |
| ORA | 13,190 | 12,412 | 23,663 | 49,265 | 0 |
| TURN | 13,190 | 12,412 | 23,663 | 49,265 | 0 |
| SCGC | 13,190 | 12,412 | 24,663 | 50,265 | 1,000 |

8
9 With the exception of SCGC, no other parties took issue with SoCalGas’ CSOO business
10 justifications for IT capital project requests.

11 **Southern California Generation Coalition (SCGC)**

12 In their testimony, SCGC asserts,

13 Second, I recommend that the Applicants’ Data Analytics program be
14 extended so that the daily Measurement Day usage produced by the
15 Applicants’ existing Automated Metering Infrastructure (“AMI”) system
16 is made available to core procurement agents on a daily basis to enable
17 them to trade Daily Scheduled Quantities and to permit the Applicants to
18 require core procurement agents to balance daily Measurement Day usage
19 with the core procurement agents’ Gas Day deliveries should such
20 balancing be required by the Commission.”⁵⁰

21 They also state,

22 Thus, I would estimate that the programming described above should be
23 completed for no more than \$1 million in capital expenditures. I
24 recommend that the Commission authorize these expenditures and direct
25 the company to complete the programming during Test Year 2019.⁵¹

⁴⁹ Ex. SCG -19-S (Baldwin) at MHB-1-MHB-2; MHB-6.

⁵⁰ Ex. SCGC (Yap) at 2 (emphasis added).

⁵¹ Ex. SCGC (Yap) at 22 (emphasis added) (citations omitted).

1 The ICDA project will integrate customer information and operational transactions
2 information to an updated data architecture platform with greater data mining and analytic
3 capabilities. ICDA will allow internal business units to develop our capabilities, transform our
4 operations and target business strategy. SCGC seeks to add to the ICDA project by its proposal.

5 SCGC is well aware that there is an ongoing Core Balancing proceeding, which would be
6 the more appropriate venue for this request. The scope of SoCalGas' ICDA project is customer
7 focused, not procurement focused, and SCGC's proposal is not nearly defined enough to
8 determine what would need to be requested in this GRC. Business rules would need to be
9 defined (presumably in Core Balancing) before data analytics requirements could be identified
10 and a project scoped. We informed SCGC in a Data Request Response that we are unable to
11 provide any estimates because system design is an extensive and complex process and cannot be
12 completed in a response to a data request.⁵² Nonetheless, SCGC asks the Commission to allocate
13 \$1,000,000 for its proposed project even though SoCalGas has not been able to determine if this
14 is technically feasible. An analysis and study would be needed to determine the feasibility and,
15 if feasible, to determine the project cost. This could take several months to complete given the
16 technical aspects of SCGC's proposal. SoCalGas believes the Core Balancing proceeding is the
17 appropriate venue to determine the outcome of SCGC's proposal and respectfully requests that
18 their proposal be rejected in this GRC.

19 **V. CONCLUSION**

20 In summary, ORA's proposed reductions to the requested Customer Contact Center
21 Support funding is not adequately supported and should not be adopted. Similarly, SoCalGas
22 has addressed the proposed disallowances and flawed assumptions presented by TURN. TURN
23 provides no analysis nor sufficient justification to support its forecasts and they should be
24 rejected. SoCalGas' TY 2019 request has been documented in prepared direct testimony,
25 workpapers, rebuttal testimony and responses to data requests. Accordingly, SoCalGas' TY
26 2019 forecast for CSOO should be adopted.

27 SoCalGas has also addressed CUE's claims of inadequate staffing in the CCC and
28 SCGC's capital proposal. These proposals should be rejected by the Commission.

29 This concludes my prepared rebuttal testimony.

⁵² See SCGC-SCG-DR-005, Question 5.1.1, attached as Appendix D.

APPENDIX A
CCC SI Clerk Job Description



A Sempra Energy company

SOUTHERN CALIFORNIA GAS COMPANY – JOB PROFILE

| | |
|---------------------|-------------------------------------|
| Job Title: | INVESTIGATION REPRESENTATIVE |
| Location: | San Dimas |
| Grade: Class | 6 |
| Code: | |

THIS PROFILE DOES NOT ATTEMPT TO LIST ALL OF THE DUTIES THAT ARE OR MAY BE PERFORMED IN THIS CLASSIFICATION.

Overview

Directly responsible for resolving simple and complex problems related to core customers.

Essential Duties and Responsibilities

- Exercises full working responsibility under general supervision for conducting analytical review of simple and complex problems related to the core customers.
- Is responsible for exercising good judgment in gathering all required data to reconcile unusual or unique problems.
- Assists mobile home parks with billing procedures.
- Contacts various levels of management and non-management personnel as necessary to gather and investigate all available data relating to the problem being analyzed.
- Composes original correspondence as necessary to investigate, explain or reconcile the problem with the customer.
- Investigates and compiles written responses to CPUC informal complaints.

- Provides verbal responses to assigned CPUC telephone referrals.
- Negotiates settlements with customers that have appealed the CPUC's findings in informal complaint cases.
- Prepares original written responses to certain customer complaints received through the Company's Executive Offices.
- Responds to and/or coordinates resolution to CPUC telephone referrals with either the customer or the C.P.U.C. representative as necessary during immediate Supervisor's absence.
- Is responsible for answering the Executive Office complaint line when immediate Supervisor is unavailable.
- Appears as a Company witness at CPUC formal complaint hearings as necessary.
- Responds to subpoenas for all general ledger accounts.
- Appears as a Company witness in municipal and/or superior court when records are subpoenaed.
- Is responsible for analyzing all unsatisfied high bill complaints, determines proper allowances for leaks involving Company facilities, negotiates D.R. meter estimates, reaches agreement with customers on arbitrary allowances when justified.
- Calculates billings for D.R. meters, switched meters, bypassed meters, rate changes and similar problems.
- Performs various other equivalent or lower grade functions.
- On some assignments, may provide work direction to lower grade clerks.

CONTACTS

Makes special field calls and customer contacts to resolve problems. Contact with Company attorneys and representatives from the PUC.

MINIMUM QUALIFICATIONS

Knowledge of typing and the ability to effectively operate a computer and its peripheral equipment. Must successfully complete Formal Customer Billing Analyst training and have either experience as a CSR-4 or Billing Analyst. Demonstrate effective oral communication with various personality types; effective customer relations skills; effective analytical skills; basic math and business writing skills. Requires a valid California driver's license. **Must pass a pre-qualification test examination: Administrative test battery; Skill test – Typing 30 WPM. No Physical Abilities test is required.**

PHYSICAL DEMANDS

Occasionally lifting and/or carrying such articles as microfiche and small tools or items weighing up to approximately 10 pounds. Although a sedentary job is defined as one which involves sitting, a certain amount of walking and standing are often necessary in carrying out job duties. Jobs are sedentary if walking and standing are required only occasionally and other sedentary criteria are met. Certain functions of this job may require some physical strength and endurance needed to effectively and safely perform.

Environmental Conditions

Normal office environment.

APPENDIX B
Data Request TURN-SEU-062

TURN DATA REQUEST-062
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: APRIL 26, 2018
DATE RESPONDED: MAY 11, 2018

13. Regarding 200001.000 (customer contact center support):

- a. Please provide a narrative explanation as to why labor expenses in were forecast at \$5,552,000 in 2017 while actual 2017 labor expenditures were \$4,892,000.
- b. How much of the 3.6 FTE and \$341,000 in labor devoted to Aliso Canyon was returned to this function in 2017?
- c. Were the five positions for CCC Support technical editor and training specialist positions, the CCC Advisor position and the two special investigations clerks identified in SCG-19-WP-29 filled either in 2017 or 2018 to date? If so, when?
- d. Was the increase in non-labor spending to send confirming e-mails from the IVR incurred in 2017? If so, when during the year was the program started? If not, when is it expected to be incurred if at all?
- e. Has the 2018 performance advisor for “coach the coach training” been hired yet? If not, when is that hire planned?
- f. Please provide data on cost per offered call, average cost per minute, and the call volume figures for 2017 comparable to the 2016 data shown on SCG-19-WP page 41.
- g. Is the 2019 line item to spend \$167,000 to “sponsor a portion of AM’s ongoing project transition to Bill Analyzer/EP Tools” a recurring item or a one-time item?
- h. What was the maintenance or licensing fee associated with “the old speech analytics software that was retired in BY 2016” (Testimony page MHB-26)?
- i. Please identify software license maintenance and hosting fees actually incurred in 2017.

TURN DATA REQUEST-062
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: APRIL 26, 2018
DATE RESPONDED: MAY 11, 2018

Utility Response 13:

- a. The \$630k variance between 2017 CCC Support forecast labor and 2017 actual expenditures was due to:
 - \$134,00 for New Billing Training Specialist and 2 Special Investigation Representative positions not filled.
 - \$76,000 due to earlier than planned completion of FOF idea - Increase productivity for Clerical group by using formal Lean Six Sigma methods to optimize processes.
 - \$73,000 related to temporary vacancies in Special Investigation team due to retirements.
 - \$83,000 due to temporary vacancies due to extended illness for a QA Specialist and Administrative Clerk.
 - \$101,000 due to management and clerical cost of living increases not received in 2017.
 - \$163,000 due to temporary vacancies in positions due to employees on temporary assignments and filling behind positions.

- b. All of the 3.6 FTEs and \$341,000 in labor devoted to Aliso Canyon were returned to this function in 2017.

- c. The five positions have not been filled yet. Below is the status of each position:
 - i. Technical Editor – Delayed start time for the Online Help Project for which the temporary contract services Technical Editor was planned. SoCalGas is currently evaluating a third party to provide support for this project.

 - ii. Billing Training Specialist – SoCalGas is working with the Billing department to implement new technology to have better analytics on the work that is performed. Based on the project implementation date, the plan is to hire this position in 2019.

 - iii. CCC Advisor – This position was to be filled in 2018. However, when the Call Recording system was upgraded in March 2018, professional services were included to recreate the Speech Analytics call categories and existing tags in the new system, and to help create additional tags. Since this work was being completed by outside consultants, the decision was made to postpone filling this position until later in the year.

 - iv. Two Special Investigation Reps – Three (3) Special Investigation representatives retired in 2017. SoCalGas filled behind these positions in 2017 and all have completed the training. There is a high learning curve for the Special Investigation Reps and SoCalGas did not want to bring an additional two clerks on until these representatives are fully trained. SoCalGas is planning to fill the two new positions in 2019, after the new Billing Training Specialist position is filled and able to train.

TURN DATA REQUEST-062
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: APRIL 26, 2018
DATE RESPONDED: MAY 11, 2018

Utility Response 13 Continued:

- d. Yes, the confirmation email expense was incurred starting in June 2017.
- e. The Performance Advisor position was filled in February 2018 and is currently supporting Supervisor coaching, filling behind a Performance Advisor that is out on maternity leave. Once the Advisor returns from maternity leave, the person hired will start coaching Lead CSRs.
- f. See file TURN-DR-SEU-062 Attachment Q6a_Q7_Q11_Q13f Tab Q13f for the telecommunications cost per minute.
- g. The \$167,000 Bill Analyzer/EP tools non-labor expense is a recurring item.
- h. The annual maintenance fee for the old speech analytics software retired in 2016 was \$33,356.63.
- i. The total software license maintenance and hosting fees paid in 2017 were \$1,397,874.

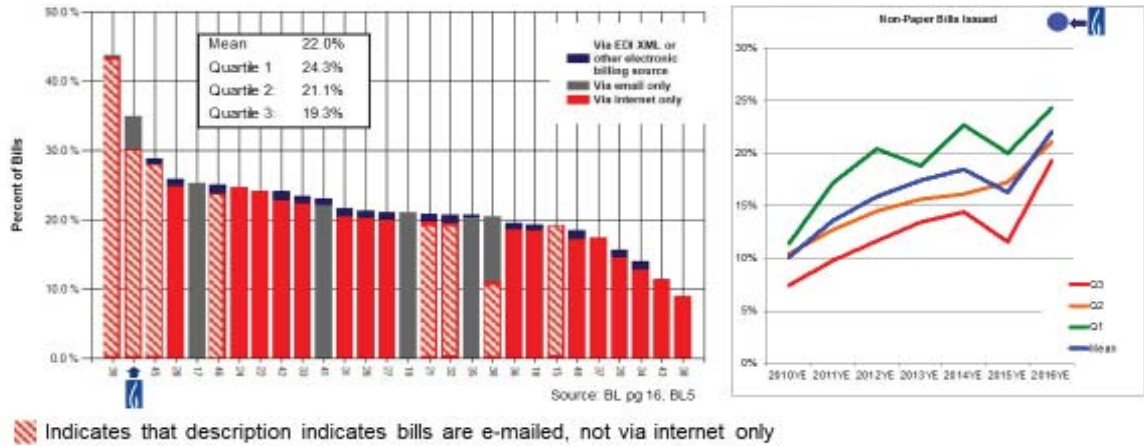
APPENDIX C
First Quartile Consulting Benchmarking Report

APPENDIX C

First Quartile Consulting Benchmarking Report Dated October 2, 2017

ELECTRONIC BILL TRENDS

- Electronic bill adoption continues to rise. Most companies just send a notification that the bill is ready and post the bill information on the utility website.
- SoCalGas has achieved the 2nd highest % of electronic bills



APPENDIX D
Data Request SCGC-SEU-05 Q5.1.1

SCGC-SEU DATA REQUEST-005
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SEU RESPONSE
DATE RECEIVED: APRIL 23, 2018
DATE RESPONDED: MAY 7, 2018

Regarding SCG-19R: Customer Services - Office Operations

5.1. With respect to the statement on page MHB-73:

ICDA is a strategic priority and enabler of multiple projects within the Customer Services and Customer Solutions organizations. ICDA's goal is to develop data analytics capabilities (people, technology and process) that enable the future vision of SoCalGas' customer analytics. The technology solution accommodates platforms, tools and various sources of customer data, increased data volume generated from Advanced Meter interval data, customer self-service transactional data and external third-party data. Data Analysts, Data Scientists and Data subject matter-experts (people) will use data to analyze customer behavioral patterns, trends, and preferences during the customer evolution process (starting service, requesting service orders, program participation, remittance processing, transferring services, among others).

And the discussion about Phase 3 of the ICDA project, which occurs on page MHB-74 stating that "the objective of this project is continue the enhancement of the ICDA." The following questions relate to the enhancement of the ICDA system so that it would be capable of producing information that would enable the core to balance to actual burn from the previous day.

- 5.1.1. Please state the estimated cost required to produce the programming necessary to expand the master data that is uploaded from the CIS system to the Data Warehouse on a daily basis so that this data includes the identity of the agent that procures gas on behalf of each core customer.

Utility Response 5.1.1:

SoCalGas objects to the request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and 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 within the scope of the pending proceeding. SoCalGas further objects to this request on the grounds that the request is vague and ambiguous, and burdensome to the extent that the request asks SoCalGas to design and estimate costs for a new system or product in response to a discovery request, which is an inappropriate use of the discovery process.

APPENDIX E
TNS Customer Experience Survey April 2018

Self Service Deep Dive



Parameters

Call Origination: All
 Online Origination: All
 Region Code: All
 Service Month: June
 Service Year: 2018
 Survey Name: CES (Phone)
 Transaction Code: All
 Last Closed Month: Data complete through April 2018

| Question | Previous Year | Target | Current YTD | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Q1 | Q2 | Q3 | Q4 |
|---|---------------|--------|-------------|-------|-------|-------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-------|----|----|----|
| Easy to navigate menu | 34.7% | | 34.5% | 32.3% | 34.6% | 36.6% | | | | | | | | | | 34.5% | | | |
| IVR Effort | | | | | | | | | | | | | | | | | | | |
| Very little effort | 74.4% | | 73.6% | 74.2% | 73.3% | 73.4% | | | | | | | | | | 73.6% | | | |
| Some effort | 19.3% | | 20.3% | 20.3% | 21.1% | 19.6% | | | | | | | | | | 20.3% | | | |
| A lot of effort | 6.3% | | 6.1% | 5.6% | 5.6% | 7.1% | | | | | | | | | | 6.1% | | | |
| IVR Ease of Use | | | | | | | | | | | | | | | | | | | |
| Stopped using IVR (Yes) | 48.9% | | 45.7% | 44.2% | 46.0% | 46.8% | | | | | | | | | | 45.7% | | | |
| Length of time on hold (Mean) | 3.1 | | 3.3 | 3.2 | 3.2 | 3.4 | | | | | | | | | | 3.3 | | | |
| Reasonableness of wait time - Very reasonable | 55.3% | | 54.2% | 51.8% | 53.4% | 57.2% | | | | | | | | | | 54.2% | | | |

Stat testing shown on the report is based at the 99% level and requires a minimum base size of 30 responses for the test result to display. Socialgas.com services only includes field-related transactions.

* The total of the percentages shown may add to more than 100%, because a respondent may answer more than one attribute for this question.
 ** Caution: As filters are applied, the base sizes may go below the threshold needed for statistical significance.

Self Service Deep Dive



Parameters

Call Origination: All
 Online Origination: All
 Region Code: All
 Service Month: June
 Survey Year: 2018
 Survey Name: CES (Phone)
 Transaction Code: All
 Last Closed Month: Data complete through April 2018

| Question | Previous Year | Target | Current YTD | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Q1 | Q2 | Q3 | Q4 |
|--|---------------|--------|-------------|-------|-------|-------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-------|----|----|----|
| I had additional questions/needed more information | 17.1% | | 22.5% | 21.4% | 18.5% | 27.5% | | | | | | | | | | 22.5% | | | |
| Wanted to reschedule/confirm appointment | 8.0% | | 7.8% | 9.5% | 6.2% | 7.2% | | | | | | | | | | 7.8% | | | |
| Other | 3.8% | | 0.5% | 0.0% | 1.5% | 0.0% | | | | | | | | | | 0.5% | | | |
| Overall IVR Rating (complete score) | | | | | | | | | | | | | | | | | | | |
| Excellent | 30.1% | | 30.5% | 28.0% | 30.4% | 33.0% | | | | | | | | | | 30.5% | | | |
| Very Good | 30.1% | | 29.5% | 31.8% | 28.3% | 28.3% | | | | | | | | | | 29.5% | | | |
| Good | 30.1% | | 31.0% | 31.3% | 33.0% | 29.0% | | | | | | | | | | 31.0% | | | |
| Fair | 6.2% | | 5.7% | 5.8% | 5.1% | 6.3% | | | | | | | | | | 5.7% | | | |
| Poor | 3.4% | | 3.2% | 3.1% | 3.1% | 3.4% | | | | | | | | | | 3.2% | | | |
| Question | Previous Year | Target | Current YTD | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Q1 | Q2 | Q3 | Q4 |

Stat testing shown on the report is based at the 99% level and requires a minimum base size of 30 responses for the test result to display. Socialgas.com services only includes field-related transactions.

* The total of the percentages shown may add to more than 100%, because a respondent may answer more than one attribute for this question.
 ** Caution: As filters are applied, the base sizes may go below the threshold needed for statistical significance.



APPENDIX F
Glossary of Terms

| | |
|------------|--|
| ADA | Americans with Disabilities Act |
| AHT | Average Handle Time |
| AMI | Automated Metering Infrastructure |
| APL | Authorized Payment Locations |
| BY | Base Year |
| CCC | Customer Contact Center |
| CCR | Customer Contact Representative |
| CforAT | Center for Accessible Technologies |
| CIS | Customer Information System |
| Commission | California Public Utilities Commission |
| CSOO | Customer Services – Office Operations |
| CSRs | Customer Service Representatives |
| CUE | Coalition for Utility Employees |
| EDRMA | Energy Data Request Memorandum Account |
| FOF | Fueling Our Future |
| FTE | Full-Time Equivalent |
| HDD | Heating Degree Days |
| ICDA | Integrated Customer Data Analytics |
| IVR | Interactive Voice Response |
| LOS | Level of Service |
| MDO | Measurement of Data |
| MMCC | Major Market Credit and Collections |
| O&M | Operating & Maintenance |
| ORA | The Office of Ratepayer Advocates |
| RAMP | Risk Assessment Mitigation Phase |
| SCGC | Southern California Generation Coalition |
| SI | Special Investigations |
| SoCalGas | Southern California Gas Company |
| TURN | The Utility Reform Network |
| TY | Test Year |
| VREP | Voluntary Retirement Enhancement Program |
| YTD | Year-to-Date |