Application of Southern California Gas Company (U904G) for authority to update its gas revenue requirement and base rates effective on January 1, 2012.

Application 10-12-____ Exhibit No.: (SCG-11)

PREPARED DIRECT TESTIMONY OF HECTOR A. MADARIAGA ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECEMBER 2010



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1	Р	REPARED DIRI	ECT TESTIMON	VY OF		
2	HECTOR A. MADARIAGA					
3	ON BEHALF	OF SOUTHER	N CALIFORNIA	GAS COMPA	NY	
4		(FLEET	SERVICES)			
5						
6	I. INTRODUCTION					
7	A. Purpose of T	estimony				
8	The Fleet Services of	rganization is a sh	ared service, and p	provides vehicle	e acquisition and	
9	disposition, maintenance and	d repair, fuel mana	agement, and tech	nical services to	San Diego Gas	
10	& Electric (SDG&E), South	ern California Gas	S Company (SCG	or SoCalGas), a	nd, on a limited	
11	basis, to the parent company Sempra Energy Corporate Center (Corporate Center), and other					
12	affiliate companies of Semp	ra Energy.				
13	The purpose of this testimony is to describe the activities performed by the Fleet Services					
14	organizations at SoCalGas, summarize the total SoCalGas non-shared and shared service					
15	operating and maintenance (O&M) expenses by functional activity, and provide justification for					
16	the reasonableness of the requested 2012 Test Year (TY2012) O&M costs.					
17	The following table SCG-HM-1 provides a summary of the requested TY2012 O&M					
18	costs for SoCalGas Fleet Services.					
19						
20 21 22	Table SCG-HM-1Summary of TY2012 Change(Thousands of \$2009)					
	FLEET SERVICES Description	2009 Adjusted- Recorded	TY2012 Estimated	Change	Testimony Reference	
	Total Non-shared	\$40,363	\$49,187	\$8,824	Section II	

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NOTE: The Fleet Services charges are the direct costs in FERC clearing account 184.2.The reassignment of these costs to operating and maintenance and capital costs isdiscussed in the SoCalGas testimony of Rajan Agarwal, Exhibit SCG-36.

1,504

\$50,691

1,380

\$41,743

Section III

124

\$8,948

Total Shared Services

Total O&M

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В.

Overview of Operations

1. Description of Fleet Activities

Fleet Services acquires, maintains, repairs and salvages vehicles and related equipment to support the reliable delivery of gas to more than 6 million SoCalGas customers. SoCalGas Fleet Services manages a mix of vehicles consisting of autos, light duty, medium and heavy duty trucks, and power operated equipment including trailers and forklifts. Fleet Services provides daily support critical to the gas distribution and transmission operating crews, meter reading operations, and customer services field operations in addition to the capital construction program.

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The key activities of Fleet Services are to:

(a) Provide the necessary quantity, type and configuration of vehicles and equipment in a timely and cost efficient manner required daily by gas operations to meet new business demands, respond to gas service outages and service requests, support infrastructure replacement and conduct the corrective maintenance programs central to maintaining reliable service.

(b) Maintain vehicles and equipment to reliably meet increasing daily availability
requirements. The increasing age of the gas system as well as new business demands that
vehicles be available for use essentially 24 hours a day 7 days a week.

(c) Manage the vehicle and equipment asset portfolio through the design, acquisition, financing, and replacement of vehicles.

(d) Implement standardization of fleet equipment and technological changes in vehicles to effectively manage acquisition costs and maintenance costs.

(d) Provide specialized equipment and manage fuel acquisition and operations.

(f) Implement fleet systems and processes to minimize the costs and optimize operations.

(g) Comply with Federal, State and Local statutes and agency regulations pertaining to air quality, waste, hazardous materials, natural resources, safety, and alternative-fueled vehicles. Of particular impact upon the Fleet Service organization and costs are:

28 29 *Energy Policy Act (EPA) requirements regarding the federally mandated procurement of alternative-fueled vehicles.

1 2 3	*California Air Resources Board (CARB) regulations requiring the reduction of diesel emissions by retrofitting or replacing diesel vehicles and off-road equipment
4	*U.S. Environmental Protection Agency (EPA) and CARB regulations requiring
5	diesel engines to reduce oxides of nitrogen and particulate matter emissions.
6 7	*California Highway Patrol mandated inspections, training and other regulations applicable to heavy-duty fleet vehicles and equipment.
8 9	*OSHA and Cal OSHA mandated inspections, training and other regulations applicable to fleet operations and equipment acquisition.
10 11	*Other Environmental Protection Agency requirements governing air quality, water quality, waste, hazardous materials, safety and natural resources, including
12	mandated inspections and repairs applicable to underground storage tanks,
13 14	management.
15 16	(h) Ensure proper training of Fleet Maintenance personnel and hazardous waste disposal requirements of fleet materials.
17 18	(i) Evaluate changes in technology, regulation and operational trends to ensure they are properly incorporated into all fleet related plans and activities.
19 20	(j) Ensure that facilities are outfitted with the required tools and equipment to maintain vehicles and power operated equipment.
21	2. Summary of Managed Fleet Assets
22	The SoCalGas fleet consists of over 5,000 vehicles. The fleet is broken down into over
23	85 individual vehicle classifications, which can be summarized into major types as follows:
24	
	SCG Doc#249645 HM-3

(Year-End 2009)				
VEHICLE TYPES	No. of Units			
Automobiles	323			
Compact Trucks and Vans	584			
Light Duty Trucks and Vans	2,607			
Medium Duty Trucks and Vans	543			
Heavy Duty Trucks and Vans	80			
Trailers	681			
Construction Equipment	291			
TOTAL	5,109			

Table SCG-HM-2

SoCalGas Vehicle Types

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3. Fleet Organizational Structure

In carrying out its functions, the Fleet Services organization contains the following groups:

During 2009, SoCalGas vehicles accumulated more than 34 million miles and were serviced at

construction requirements for customer growth as well as gas distribution and transmission and

49 fleet maintenance garages. SoCalGas maintains a wide variety of vehicles to meet new

- Asset Management
- Financial and Systems Management
- Maintenance Operations North

customer service maintenance activities.

- Maintenance Operations South
- Director Fleet Services

Asset Management

This function develops the vehicle replacement plan, vehicle design and specifications, manages vehicle supplier and rental vendor relationship, including quality assurance inspections of new vehicles, warranty, and goodwill recovery, and manages vehicle auction and salvage operations. It also coordinates fleet policies and the overall fleet portfolio planning and analysis for both SDG&E and SoCalGas.

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Financial and Systems Management

This function manages the financial processes and data systems necessary to support fleet operations for both SDG&E and SoCalGas, including lease and license administration for all utility vehicles, budget preparation and oversight, accounting reconciliations, vehicle class charge rates and clearing, quality assurance inspections, inventory management oversight, and strategic support and analysis to the maintenance organization, along with ensuring compliance with associated business controls.

8 Maintenance Operations - North

This function manages the garage activities (vehicle inspections, maintenance and repairs, and training) at SoCalGas sites. It is organized by regional area and coordinates onsite maintenance and repairs, parts inventories, and vehicle transfers. The maintenance support staff is located at Monterey Park.

13 <u>Maintenance Operations – South</u>

This function manages the garage maintenance activities (vehicle inspections, maintenance and repairs, and training) for the SDG&E Fleet and is located at garages throughout the SDG&E service territory. The maintenance support staff is located at Miramar.

Fleet Services Director

The Fleet Services Director function provides the overall leadership of the organization. Major environmental projects and fuel purchases are managed under this function.

C. Challenges Facing Operations

The key challenge facing the Fleet organization during the next decade is technological change, driven by emissions reduction requirements and the goal of reducing the company's carbon footprint. CARB requirements for Airborne Toxics Control Measure (ATCM) engine retrofits, and where retrofit is not practical the alternative of early replacement of heavy duty vehicles, contribute significantly to upward pressures on Fleet costs. Additionally, with all vehicles becoming more complex and costly to maintain and operate (as the recent spate of Toyota accelerator issues demonstrates), the technician workforce must be retrained or replaced to effectively manage the fleet of the future. New diagnostic tools, preventive measures to ensure vehicles do not become stranded in the field with plugged particulate filters, fueling capacity for alternative-fueled and hybrid vehicles, changes in maintenance procedures and

lubricants, and other challenges as yet unseen, all contribute to an uncertain, yet exciting,
 challenging time to be in the Fleet management business.

D. Summary of Request

Table SCG-HM-3 O&M Non-Shared Services Testimony Section II (Thousands 2009 dollars)

FLEET SERVICES	2009 Adj.	TY2012	
Categories of Management	Recorded	Estimated	Change
1. Ownership Costs	\$17,058	\$20,761	\$3,703
2. Maintenance Operations	21,700	27,000	5,300
3. Maintenance Management	1,032	1,223	191
4. Vehicle & Equip. Rentals	573	203	-370
Total	\$40,363	\$49,187	\$8,824

Table SCG-HM-4 O&M Shared Services Testimony Section III (Thousands 2009 dollars)

FLEET SERVICES	2009 Adj.	TY2012	
Categories of Management	Recorded	Estimated	Change
1. Asset Management	\$621	\$622	\$1
2. Financial & Sys Mgmt	653	546	-107
3. Maintenance Mgmt	84	184	100
4. Director	22	152	130
Total (Book Expense)	\$1,380	\$1,504	\$124

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II.

NON-SHARED SERVICES

A. Introduction

As discussed in Section III, the Fleet departments of SoCalGas and SDG&E share a management team that achieves synergies in vehicle specifications and bidding, replacement and environmental planning, financial and systems management, lease and license administration, fuel purchases and training, but costs that are unique to each company are not shared. These non-shared costs consist of the following categories:

Table SCG-HM-5

FLEET SERVICES	2009 Adj.	TY2012	
Categories of Management	Recorded	Estimated	Change
1. Ownership Costs	\$17,058	\$20,761	\$3,703
2. Maintenance Operations	21,700	27,000	5,300
3. Maintenance Management	1,032	1,223	191
4. Vehicle & Equip. Rentals	573	203	-370
Total	\$40,363	\$49,187	\$8,824

O&M Non-Shared Services (Thousands of 2009 dollars)

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B. **Discussion of O&M Activities**

1. **Ownership Costs**

SoCalGas lease finances its vehicles (except for limited short term rentals) and incurs annual repayment (amortization) of principal and interest for each vehicle over the term of each lease. Replacement scheduling is based on targeted useful lives of vehicles by various classes, and ownership costs for each year are forecast using a cash-flow model developed in-house by Fleet staff using Microsoft Excel. The model projects the pay-down of active lease obligations, applies specified lease duration terms and associated interest to new fleet assets scheduled to be placed in service during each forecast year, and estimates annual salvage based on historical auction sale averages by vehicle class. Data for existing leases and eligible replacement vehicles is loaded directly into the model through queries from the Fleet M4 database, while data for special projects such as incremental vehicle additions and our proposed "Green Initiative" are manually input to generate the cash-flow forecast. Detailed monthly forecast totals for each category of model inputs are contained in the work paper attachment titled "Fleet Ownership Cost Forecast 2010-2012," with all categories rolling up to expense totals as follows:

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Table SCG-HM-6			
O&M Non-Shared Services			
(Thousands of 2009 dollars)			

FLEET SERVICES	2009 Adj	TY2012	
1. Ownership Costs	Recorded	Estimated	Change
a. Amortization	\$15,064	\$17,732	\$2,668
b. Interest	993	2,389	1,396
c. Salvage	-753	-1,180	-427
d. License Fees	1,754	1,820	66
1. Total Ownership	\$17,058	\$20,761	\$3,703

61% of the 2012 forecast total in table SCG-HM-6 is for committed financing of existing vehicles and replacements currently under purchase order, 32% is for replacements scheduled to be purchased in the 2010-2012 time period, 3% for incremental vehicle additions requested by operating departments, and 4% for a "Green Initiative" to convert new gasoline-powered vehicles to CNG. As a fuel provider, 90% of the SCG annual light duty vehicle purchases is required under the Energy Policy Act (EPAct) to be approved alternative-fueled vehicles, a requirement that is becoming increasingly more difficult to meet as vehicle manufactures have stopped manufacturing Natural Gas Vehicles (NGVs). By converting up to 200 vehicles to CNG per year with a target of 1000 vehicle conversions, SoCalGas will be leading by example, and in turn, preserving its investment in NGV fueling infrastructure for the next generation of natural gas and potentially fuel cell vehicles. These vehicles will also replace existing dual-fuel CNG vehicles that are getting older and need to be replaced.

a. Amortization

The cost associated with lease amortization for 2010-2012 is based on year-end 2009 actual vehicles under lease financing plus the planned replacement vehicles scheduled each year, and requested incremental vehicle additions each year. Vehicle acquisition costs are estimated using the last purchase price of a vehicle in each class escalated to the replacement year using the IHS Global Insight Composite Gas Non-Labor index¹, then annualized based on the amortization schedule for the vehicle class. Since amortization expenses involve debt retirement, and escalation is included in the price estimates for new vehicle acquisitions, this cost category is not amenable to standard escalation forecasting, and the annual cost estimates were generated using the cash-flow model that essentially calculates each year from a zero-base.

¹ See the testimony of Scott Wilder, Exhibit SCG-31, regarding IHS Global Insight econometric forecasting.

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b. Interest

As the result of a major vehicle refinancing effort that was necessary due to the termination of the SoCalGas master lease during the 2008 financial crisis, roughly half the SoCalGas vehicles under lease finance at the end of 2009 were under a capital lease with fixed interest rates and the other half an operating lease with floating interest rates tied to the London Interbank Offered Rate (LIBOR) index plus a fixed margin above the index. All replacement and incremental vehicle additions are forecast to be financed under the operating lease with floating interest rates, as financial conditions return to normal after the crisis. Interest costs in each forecast year are based on monthly outstanding balances calculated in the cash-flow model multiplied by the LIBOR rate contained in the "IHS Global Insight's February 2010 Forecast of the US Economy" for the payment month, then summed for the year.

c. Salvage

Vehicles are sold for salvage at the end of their useful life. Any net proceeds are credited back to Fleet offsetting the incremental acquisition costs of replacement vehicles. Estimates of salvage proceeds for each forecast year are determined by multiplying the number of vehicles expected to be replaced during the year by the average per-unit salvage received during the base year.

d. License Fees

License fees payable to the State of California each year are a function of the age and composition of the fleet during that year, and consist of several components based on vehicle weight, capacities, age, purchase price, and location. Since replicating the DMV formula for every vehicle in the fleet is not feasible, the base year ratio of license fees to amortization is used for forecasting.

2. Maintenance Operations

Maintenance Operations involves the performing of vehicle safety inspections and other routine maintenance (such as oil changes), managing the automotive fuel inventory to ensure the availability of fuel to meet operating needs, repairing vehicle damage and replacing worn and defective parts, and ensuring compliance with all applicable Federal, State, and Local environmental, safety, and emissions regulations. As highlighted above in comments on challenges facing the Fleet department, significant upward cost pressures result from this
 regulatory environment, as summarized in table SCG-HM-7:

Table SCG-HM-7O&M Non-Shared Services(Thousands of 2009 dollars)

FLEET SERVICES	2009 Adj	TY2012	
2. Maintenance Operations	Recorded	Estimated	Change
a. Maintenance & Repair Services	\$11,571	\$12,882	\$1,311
b. Automotive Fuels	8,532	10,582	2,050
c. ATCM Diesel Engine Retrofits	1,597	3,510	1,913
2. Maintenance Operations Total	\$21,700	\$27,000	\$5,300

a. Vehicle Servicing and Repairs

Vehicle servicing and repair activities are carried out in 49 garage locations disbursed throughout the service territory. Staffing requirements for these garages is forecast to increase by 6 technicians in 2011 and another 6 in 2012. These staffing requirements are needed to maintain, regenerate and clean particulate filters required on existing diesel vehicles and are in all new diesel vehicles that are compliant with 2007 regulation.

In addition, 2010 diesel vehicles also require the use of diesel exhaust fluid to reduce Nitrogen of Oxides (NOX) emissions. These new systems must be properly maintained to ensure compliance and prevent damage to engines, which would make vehicles unavailable to respond to emergencies and operational needs. All these requirements will increase operational and maintenance costs.

b. Automotive Fuels – Gasoline & Diesel

No one needs to be reminded of the volatility of automotive fuel prices during the past several years, nor that such volatility makes predicting the cost of fuel in 2012 nearly impossible. Accordingly, the 2005-2009 5-year average is used to forecast years 2010-2012. The change from 2009 to 2012 using this method obviously looks dramatic, but it must be kept in mind that the 2012 number is the average annual cost actually <u>incurred</u> during the historical 5-year period from 2005-2009. The abnormal number, therefore, is 2009, not 2012. Fuel prices were depressed in 2009 as a result of the recession, and SoCalGas fuel costs in 2009 were further reduced through fuel hedging that generated more than \$350,000 in hedging credits booked to

the Fleet fuel account. As the economy improves, fuel prices are already moving higher, and while fuel hedging is continuing, the effectiveness benefits booked in 2009 must be unwound by 2011 as futures contracts expire.

The cost of fuel, of course, is a function of both price and quantity consumed. Efforts to reduce fuel consumption to meet greenhouse gas reduction targets should have a beneficial impact on fuel costs, offset to some extent by reduced fuel economy in diesel engines retrofit with particulate traps as well as additional vehicles, but price will remain the dominate factor, and a return to the historical 5-year average annual fuel cost is a reasonable expectation.

c. ATCM Diesel Engine Retrofits

A combination of State and Federal regulations requiring reductions in particulate and nitrous oxide emissions from diesel engines are driving the cost forecasts. The Public Agency and Utility rule contained in the 2005 California Air Resources Board (CARB) Airborne Toxics Control Measure (ATCM) requires that the retrofit or replacement of all specified diesel engines be completed by 2012, with a recent extension for Group 3 engines to 2013. The forecast increase in cost between 2009 and 2012 is a direct result of compliance with the phase-in requirements of the rule, with SoCalGas having 285 vehicles remaining in the phase-in schedule. 79 of these units are planned for replacement, while 206 will undergo retrofit by the mandated 2012 deadline, costing an average of \$25,000-\$30,000 per retrofit. Along with these Public Agency and Utility rule-mandated retrofits, the 2012 forecast includes the retrofit of 32 off-road diesel engines that are required to be retrofit or replaced by 2014 under the In Use Off-Road Diesel Rule.

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3. Maintenance Management

Maintenance Management involves both a shared and non-shared function. The shared function is technician training, and is addressed in Section III of this testimony. The non-shared function is garage supervision and support, with costs summarized as follows:

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Table SCG-HM-8 O&M Non-Shared Services (Thousands of 2009 dollars)

FLEET SERVICES 3 Maintenance Management	2009 Adj Becorded	TY2012 Estimated	Changa
a. Garage Supervision & Support	\$1,032	\$1,223	\$191
3. Maintenance Management Total	\$1,032	\$1,223	\$191

a. Garage Supervision and Support

The management team performing the garage supervision and support function at SoCalGas consists of a Maintenance Manager, six geographic area Fleet Supervisors, and 5 clerks. The team establishes and monitors performance standards, manages garage technicians, assesses supplier work quality, performs replace/repair analyses and payroll data entry, and coordinates the assignment of vehicles to garage locations. Technician and supplier work quality performance standards are in a state of flux in light of the rapidly changing vehicle technology, as discussed above in challenges facing operations. With the addition of technicians in 2011 and 2012 to free up technician work time for training in particulate trap cleaning, monitoring of diesel emissions fluids, maintaining hybrid and alternative fuel vehicles, and using new diagnostic tools, additional garage supervision resources will be needed to establish and enforce new performance standards and manage work assignments, thus the forecast upward trend in Maintenance Management costs in 2012.

4. Vehicle & Equipment Rentals

Fleet Services pays for vehicle and equipment rentals from its budget when (1) a vehicle is out-of-service for an extended period for repairs, and (2) the delayed delivery of an on-order vehicle would adversely impact operations. Rental of vehicles or equipment for day jobs or short-term projects is handled directly by operating departments. Fleet costs for this function are as follows:

Table SCG-HM-9O&M Non-Shared Services(Thousands of 2009 dollars)

FLEET SERVICES	2009 Adj	TY2012	
4. Vehicle & Equipment Rentals	Recorded	Estimated	Change
a. Rentals & Miscellaneous	\$573	\$202	-\$371
4. Vehicle & Equipment Rentals Total	\$573	\$202	-\$371

a. Rentals & Miscellaneous

Since the need for rentals is determined by factors that are not readily predictable and can vary substantially from year to year, the 2005-2009 5-year average is used as the forecast method for 2012. Costs during base year 2009 were higher than average primarily because of down-time for vehicles undergoing particulate trap retrofits.

III. SHARED SERVICES

A. Introduction

Fleet Services is a utility shared service with an integrated SoCalGas/SDG&E management team. With over 7,000 vehicles, trailers, and powered equipment between the utilities (5,100 at SoCalGas and 2,100 at SDG&E), significant synergies and cost savings for both utilities are achieved by establishing common standards and bidding common specifications for vehicles with similar functions in both utilities, leveraging suppliers to achieve lower lease interest rates and volume pricing for fuel and repair parts, and reducing administrative support costs for such functions as data system management, budgeting, license administration, and replacement and salvage planning and scheduling. Categories of shared services included Asset Management, Financial & Systems Management, the training function within Maintenance Management, and the department Directorate. Detailed information about the shared services billing process can be found within the Shared Services Policy & Billings testimony of Edward J. Reyes, Exhibit SCG-24. For purposes of this testimony, that total is disaggregated by category in explaining the cost allocation formula applied to each category.

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Table SCG-HM-10 **O&M Shared Services**

FLEET SERVICES			
Summary	Base Year 2009	Forecast 2012	2009-2012 Incr. (Decr.)
SOCALGAS Incurred Costs	1,466	1,751	285
Allocations Out			
To SDG&E from SOCALGAS	593	763	170
To Corp. Center/Other	0	0	0
Subtotal Allocations Out	593	763	170
Book Expense			
SOCALGAS Retained	873	988	115
Billed from SDG&E	507	516	9
SOCALGAS Book Expense	1,380	1,504	124

(Thousands of 2009 dollars)

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The most common factors for establishing sharing ratios are headcount (or FTEs), labor cost, and total cost (labor and non-labor), depending upon the nature of the shared service. In Fleet's case, vehicle count is another obvious factor, but when it comes to specifications development and maintenance requirements, not every vehicle is equal. Therefore, in the fleet industry, Maintenance Repair Units (MRUs) are used as a normalizing standard for comparing staffing levels and benchmarking costs, much the way FTEs are used in normalizing labor costs. The count of MRUs within a fleet is determined by establishing a base-line unit - usually an unmodified automobile or pickup - determining the annual labor hours required to maintain that base-line unit, then dividing that number into the labor hours required to maintain each of the other types vehicles in the fleet. By using MRUs, the "vehicle count" ratio at the end of the base year shifts from 71% SoCalGas: 29% SDG&E to 52% SoCalGas: 48% SDG&E. This reflects the fact that the vehicles required to operate the electrical system are larger and have overhead booms, sophisticated hydraulic control systems, and other auxiliary equipment not ordinarily found on gas operations vehicles. For those shared activities otherwise tied to vehicle count, MRUs are used instead in the cost allocation formulas, to more accurately reflect the effort involved in managing those activities.

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B. Summary of Shared Services Activities

1. Asset Management

The SoCalGas Asset Management group is structured into three cost centers, each with separate allocation formulas. The first cost center includes costs for the group's Manager (with staff at both SoCalGas and SDG&E), an administrative associate, and a technology Project Manager (to be added in 2011, explaining the 2012 cost increase), all allocated based on MRUs as described above. The second cost center includes costs for a Team Lead and support staff responsible for coordination of vehicle requirements with SoCalGas operating groups, together with specifications development and in-servicing of light duty vehicles for both utilities. Costs in this cost center are accordingly allocated proportionately to the types of light duty vehicles at each utility. The final cost center includes costs for two employees reporting to a Team Lead at SDG&E who are responsible for supplier relationships and asset recovery (vehicle salvage) for both utilities. Costs in this cost center are allocated based on MRUs.

Table SCG-HM-11 O&M Shared Services (Thousands of 2009 dollars)

FLEET SERVICES			
Asset Management	Base Year 2009	Forecast 2012	2009-2012 Incr. (Decr.)
SOCALGAS Incurred Costs	648	748	100
Allocations Out			
To SDG&E from SOCALGAS	110	219	109
To Corp. Center/Other	0	0	0
Subtotal Allocations Out	110	219	109
Book Expense			
SOCALGAS Retained	538	529	-9
Billed from SDG&E	83	93	10
SOCALGAS Book Expense	621	622	1

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2. Financial and Systems Management

The SoCalGas Financial and Systems Management group is structured into two cost centers, both reporting to the group's Manager at SDG&E. The first cost center includes costs

for a data system administrator and a staff accountant, responsible for these functions at both utilities, and allocated based on MRUs. The second cost center includes costs for a Team Lead (with direct reports at both SoCalGas and SDG&E), a quality assurance inspector and a parts specialist. These individuals perform parts inventory management and compliance reviews of garage operations at both utilities, with allocation of their costs based on the number and associated time involved in reviewing locations annually at each utility.

Table SCG-HM-12 O&M Shared Services (Thousands of 2009 dollars)

FLEET SERVICES			
Financial & Systems Management	Base Year 2009	Forecast 2012	2009-2012 Incr. (Decr.)
SOCALGAS Incurred Costs	470	470	0
Allocations Out			
To SDG&E from SOCALGAS	205	224	19
To Corp. Center/Other	0	0	0
Subtotal Allocations Out	205	224	19
Book Expense			
SOCALGAS Retained	265	246	-19
Billed from SDG&E	388	300	-88
SOCALGAS Book Expense	653	546	-107

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3. Maintenance Management

While the majority of Maintenance Management expenses are non-shared, the technician training function is shared to take advantage of expertise differences between the SoCalGas and SDG&E trainers. The cost increase in the test year reflects the anticipated need to pay suppliers to train company technicians on new technologies being introduced into the fleet to ensure compliance with new emission reduction targets. The cost allocation for this function is based on the number of training sessions to be conducted by the SoCalGas trainer at each utility during the year.

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Table SCG-HM-13 O&M Shared Services

FLEET SERVICES			
Maintenance Management	Base Year 2009	Forecast 2012	2009-2012 Incr. (Decr.)
SOCALGAS Incurred Costs	80	180	100
Allocations Out			
To SDG&E from SOCALGAS	14	31	17
To Corp. Center/Other	0	0	0
Subtotal Allocations Out	14	31	17
Book Expense			
SOCALGAS Retained	66	149	83
Billed from SDG&E	18	35	17
SOCALGAS Book Expense	84	184	100

4. Director

This function consists of a single SoCalGas cost center covering costs for the department Director (with Manager direct reports at both SoCalGas and SDG&E), an administrative associate, two project managers (environmental and eco-driving), and an ATCM project engineer. A second engineer will be added in 2011 to the environmental project for evaluating NGV requirements and fueling capacity at both companies. Cost allocation for this cost center is based on the weighted average of labor and non-labor costs incurred by each of the two utilities, excluding "commutation credits." This exclusion involves SoCalGas employees who qualify for taking company vehicles home at night (first responders and field-based supervisors) and pay a monthly fee to the company to comply with IRS regulation. These fees (amounting to \$308,000 annually) are credited to Fleet as an offset to cost incurred for commuting miles driven by takehome vehicles, and are recorded in the Fleet Director's cost center (Book Expense in Table SCG-HM-14 below would be \$308,000 higher without these credits).

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Table SCG-HM-14O&M Shared Services

(Thousands of 2009 dollars)

FLEET SERVICES			
Director	Base Year 2009	Forecast 2012	2009-2012 Incr. (Decr.)
SOCALGAS Incurred Costs	268	353	85
Allocations Out			
To SDG&E from SOCALGAS	264	289	25
To Corp. Center/Other	0	0	0
Subtotal Allocations Out	264	289	25
Book Expense			
SOCALGAS Retained	4	64	60
Billed from SDG&E	18	88	70
SOCALGAS Book Expense	22	152	130

IV. CAPITAL

A. Introduction

The only Fleet-related capital request is for an upgrade to the Fleet M4 database system, and is discussed in the SoCalGas witness testimony of Jeffrey C. Nichols, Exhibit SCG-12.

V. CONCLUSION

The amounts requested for the 2012 Test year for Fleet Services are necessary to meet the needs of utility operations and customer service. They are based on an evaluation of 2005-2009 cost trends adjusted for known incremental increases and decreases forecasted over the 2010-2012 period. For the shared service activities, the costs reflect the appropriate shared service allocations between SoCalGas and SDG&E.

This concludes my prepared direct testimony.

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VI. WITNESS QUALIFICATIONS

My name is Hector A. Madariaga. My business address is 1801 S. Atlantic Blvd, Monterey Park, California, 91754. I am employed by Southern California Gas Company (SCG) as Director of Fleet Services for SCG and San Diego Gas & Electric Company (SDG&E).

5 I received a Bachelor of Science degree in Engineering from California State University 6 Northridge, where my area of emphasis was environmental engineering. I was first employed by 7 SCG in 1975, and held various positions of increasing responsibilities in Gas Engineering, 8 Research, Human Resources, and Gas Transmission. From 1997 to 2004, I was a Vice President 9 in Sempra Energy International, where I was involved in the acquisition and management of 10 international utility investments. In 2004, I returned to SCG as Director of Environmental 11 Solutions for both SCG and SDG&E. I have been in my current position since 2005. I have previously testified before the California Public Utilities Commission.