Company: Southern California Gas Company (U904G)

Proceeding: 2016 General Rate Case

Application: A.14-11-004 Exhibit: SCG-218

SOCALGAS REBUTTAL TESTIMONY OF CHRISTOPHER R. OLMSTED (INFORMATION TECHNOLOGY)

June 2015

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



Doc#297684

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SOCALGAS REBUTTAL TESTIMONY OF CHRISTOPHER R. OLMSTED

(INFORMATION TECHNOLOGY)

I. SUMMARY OF DIFFERENCES

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Only the Office of Ratepayer Advocates ("ORA") submitted testimony regarding SoCalGas' Information Technology ("IT") requested funding in this proceeding.

ORA submitted testimony regarding SoCalGas' IT operations and maintenance ("O&M") funding in this proceeding. Table CRO-1 depicts the difference between SoCalGas' total Test Year ("TY") 2016 O&M forecast and ORA's recommended amount.

Table CRO-1
Total O&M (Non-Shared & Shared)

TOTAL O&M - Constant 2013 (\$000)									
	Base Year 2013	Test Year 2016	Change						
SoCalGas	18,936	23,624 ¹	4,688						
ORA	18,936	20,438	1,502						

ORA also submitted testimony regarding SoCalGas' IT requested capital funding in this proceeding. Table CRO-2 depicts the difference between SoCalGas' 2014-2016 capital forecast and ORA's recommended amount.

Table CRO-2
Total Capital

TOTAL CAPITAL - Constant 2013 (\$000)									
2014 2015 2016									
SoCalGas	103,739	119,916	104,796						
ORA 79,709 99,824 104,79									

II. INTRODUCTION

ORA issued its report on SoCalGas IT on April 24, 2015.² The following is a summary of ORA's positions:

¹ See Revised Direct Testimony, Ex. SCG-18-R (C. Olmsted), at CRO-iv (Summary Table). ORA cites to data response SCG-DR-082 Q3- Attachment in support of a slightly smaller number (\$23,619k). The difference between the two numbers is due to rounding.

² Exhibit ("Ex.") ORA-15, Report on the Results of Operations for San Diego Gas & Electric Company and Southern California Gas Company, Test Year 2016 General Rate Case – Information Technology, ORA Witness P. Morse, April 24, 2015.

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- ORA recommends \$16.8 million for SoCalGas' O&M labor expenses, which is \$3.2 million, or 68%, less than SoCalGas' TY 2016 incremental request;³
- ORA accepts SoCalGas' TY 2016 non-labor expense forecast of \$3.6 million;⁴
- ORA recommends as part of SoCalGas' next GRC filling to track O&M expenses and capital expenditures for Cybersecurity and Risk Management in the four areas presented in this TY 2016 GRC: Governance and Compliance, Awareness and Outreach, Security Engineering and Security Operations;⁵
- ORA recommends utilizing actual recorded 2014 capital expenditures of \$79.7 million, which is \$24.1 million, or 23%, lower than SoCalGas' forecast of \$103.8 million;⁶
- ORA recommends \$48.6 million for 2015 Information Technology sponsored capital expenditures, which is the highest recorded spending from 2009-2014. ORA's recommendation is \$20.1 million, or 29%, lower than SoCalGas' forecast of \$68.7 million. ORA's recommendation results in a total IT capital forecast for 2015 of \$99.8 million compared to SoCalGas' forecast \$119.9 million; and
- ORA accepts SoCalGas' 2016 capital expenditure forecast of \$104.8 million.

III. REBUTTAL TO PARTIES' O&M PROPOSALS

A. Flawed Analysis Used in ORA's O&M Proposals

There are several fundamental flaws in how ORA has analyzed SoCalGas' O&M labor request for TY 2016 IT funding. The following sections identify these flaws in ORA's analysis and describe why SoCalGas believes the California Public Utilities Commission ("Commission") should reject ORA's recommendations and instead adopt SoCalGas' position.

1. ORA used inconsistent forecast methodologies throughout its testimony

As described in my Revised Direct Testimony, in order to reflect the fact that IT is a shared services organization with cost centers that provide services to both utilities, SoCalGas and SDG&E use base year 2013 adjusted recorded cost plus incremental activity adjustments to forecast TY 2016 costs for every IT cost category. This forecast methodology is consistently

³ Ex. ORA-15 at 3, lines 9-10.

⁴ Ex. ORA-15 at 4, lines 1-2.

⁵ Ex. ORA-15 at 31, line 22 through 32, line 1.

⁶ Ex. ORA-15 at 4, lines 10-12.

⁷ Ex. ORA-15 at 4, lines 13-18.

⁸ Ex. ORA-15 at 4, line 19.

⁹ Ex. SCG-18-R (C. Olmsted) at CRO-2, line 4 through CRO-3, line 8.

used across all workgroups and was similarly used by IT in the prior rate case (TY 2012) for both SoCalGas and SDG&E. ¹⁰

Unlike SoCalGas, ORA used a variety of forecasting methodologies when developing its final recommendations across SoCalGas and SDG&E IT cost categories. For example, ORA used inconsistent approaches for similar incremental labor cost forecasts for the two utilities and three different approaches for non-labor cost forecasts. Table CRO-3 depicts the varying forecast methodologies used by ORA in contrast to the base year plus incremental activities adjustments methodology consistently applied for all cost categories by SoCalGas and SDG&E.

Table CRO-3
Comparison of
SoCalGas, SDG&E and ORA Forecasting Methodologies – O&M

bucardas, budan	and OKA Forecasting Methodo	logics – Octivi
	SoCalGas / SDG&E	ORA
	Forecast Basis	Forecast Basis
SoCalGas IT		
Labor	Base year plus adjustments	Highest recorded, 2009-14 ¹¹
Labor - Information Security	Base year plus adjustments	Accepts SoCalGas proposal ¹²
Non-Labor	Base year plus adjustments	Accepts SoCalGas proposal ¹³
SDG&E IT		
Labor	Base year plus adjustments	Six-year average, 2009-14 ¹⁴
Labor - Information Security	Base year plus adjustments	Accepts SDG&E proposal ¹⁵
Non-Labor	Base year plus adjustments	Five-year average ¹⁶
Non-Labor – Contracts	Base year plus adjustments	Five-year trend ¹⁷
Non-Labor - Information	Base year plus adjustments	Accepts SDG&E proposal ¹⁸
Security		

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 $^{^{10}}$ D.13-05-010 at (issued May 14, 2013); *see* Direct Testimony of Jeffery C. Nichols, A.10-12-006, Ex. SCG-12R, at JCN-23, line 19 through JCN-34, line 21.

¹¹ Ex. ORA-15 at 26, lines 7-10.

¹² Ex. ORA-15 at 31, lines 12-14.

¹³ Ex. ORA-15 at 31, lines 2-4.

¹⁴ Ex. ORA-15 at 10, lines 7-8.

¹⁵ Ex. ORA-15 at 18, lines 10-12.

¹⁶ Ex. ORA-15 at 14, lines 7-10.

¹⁷ Ex. ORA-15 at 14, lines 6-7.

¹⁸ Ex. ORA-15 at 18, lines 10-12.

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ORA's inconsistent approach ignores the fact that IT is a shared services organization with cost centers that provide services to SoCalGas and SDG&E. ¹⁹ As a shared service, IT is performing a consistent set of activities and services for SoCalGas and SDG&E and thereby has similar cost structures for providing such services. A consistent forecast methodology should be used.

ORA's use of multiple forecast methodologies is arbitrary and inconsistently applied among the cost categories. In addition, ORA's inconsistent methodology approach across the complex IT organization is questionable. In contrast, SoCalGas uses a single forecasting method that is applied consistently across all IT cost categories.

2. ORA lacks any basis for rejecting SoCalGas' consistent base year plus adjustments forecast methodology

Not only did ORA arbitrarily use a variety of different forecast methodologies, but it also failed to provide any basis for rejecting SoCalGas' consistent use of base year plus adjustments.

SoCalGas adopted and consistently uses the same forecast methodology for all O&M labor forecasts. As I explain in my Revised Direct Testimony, the use of base year 2013 adjusted recorded O&M labor expenses plus adjustments for TY 2016 incremental resource requirements is appropriate and justified due to the nature of IT-related costs. The consistent use of base year 2013 adjusted recorded O&M labor expenses plus adjustments is reasonable for SoCalGas because: 22

- The pace of change in the technology industry continues to accelerate when compared to prior years. ²³
- A rapidly changing security threat landscape drives our current cybersecurity risk management activities.²⁴
- Evolving regulatory requirements around customer data privacy are not fully reflected in a historical average. ²⁵
- The level of support provided by the IT Division continues to grow as new IT capital projects and technologies are implemented. ²⁶

¹⁹ Ex. SCG-18-R at CRO-4, lines 1-2.

²⁰ Ex. SCG-18-R at CRO-2, line 4 through CRO-3, line 8.

²¹ Ex. SCG-18-R at CRO-2, line 4 through CRO-3, line 8.

²² Ex. SCG -18-R at CRO-2, line 4 through CRO-3, line 8.

²³ Ex. SCG-18-R at CRO-2, lines 6-7.

²⁴ Ex. SCG-18-R at CRO-2, lines 12-13.

²⁵ Ex. SCG-18-R at CRO-2, lines 15-16.

²⁶ Ex. SCG-18-R at CRO-2, lines 17-18.

SoCalGas consistently applies this methodology across the entire forecast because these themes do not change when considering the various IT cost categories. The same methodology is also applied to SDG&E IT forecasts since much of IT is a shared service and provides similar services to both utilities.²⁷

ORA does not provide any support or rational basis for its request that the Commission reject SoCalGas' consistent application of base year plus adjustments forecasting methodology in favor of inconsistent alternative methodologies.

B. O&M Labor Forecast

ORA recommends \$16.8 million for SoCalGas' O&M labor expenses, which is \$3.2 million, or 68%, less than SoCalGas' TY 2016 request. Table CRO-4 depicts the difference between SoCalGas' TY 2016 O&M labor forecast and those provided by ORA in this proceeding.

Table CRO-4
Total O&M Labor (Non-Shared & Shared)

O&M - Constant 2013 (\$000)								
	Base Year 2013	Test Year 2016	Change					
SoCalGas	16,667	19,998	3,331					
ORA	16,667	16,807	140					

As explained in detail below, SoCalGas provides sufficient detail through its testimony, workpapers and responses to data requests for ORA to analyze SoCalGas' labor forecast. The Commission should adopt SoCalGas' TY 2016 incremental forecast of \$3.3 million, for a total of \$20.0 million, as reasonable.

1. SoCalGas provides sufficient detail and analysis in support of SoCalGas' request of incremental TY 2016 labor expenses of \$3.3 million.

ORA asserted that "SCG's direct testimony provides little narrative for requested labor increases, and no analytical support." ORA does not question any particular incremental labor expenses. Contrary to ORA's assertion, SoCalGas' direct testimony, O&M workpapers and discovery responses provide sufficient narrative and analytical support for its incremental labor

²⁷ See Ex. SDG&E-19-R-A (Direct Revised Testimony – Amended of SDG&E witness S. Mikovits at SJM-2, line 4 through SJM-3, line 8.

²⁸ Ex. ORA-15 at 3, lines 9-10.

²⁹ Ex. ORA-15 at 26, lines 12-13.

expenses request. ³⁰ SoCalGas' workpapers provide details of SoCalGas' O&M labor expense forecast as summarized in my Direct Revised Testimony. Forecasted costs are categorized by shared and non-shared forecasts, and further into IT functional groupings (i.e., Applications, Infrastructure, Information Security and IT Support). Workpapers include additional details, such as include cost center and activity descriptions, forecast methodology explanations, 2009 through 2013 recorded costs (labor and non-labor), year-to-year (2014-2016) line item incremental activities for 37 cost centers (shared and non-shared), and explanations for incremental changes for each of the forecast years.

For example, a portion of SoCalGas' overall labor forecast is tied to the increase in application support responsibilities identified for SoCalGas Application Services (cost center 2200-2418) as a result of the implementation of capital projects. This forecast appears in my Direct Revised Testimony as part of Shared Application costs and is also included in my O&M workpapers. For the reader's ease, Appendix A (attached) includes the set of workpapers for cost center 2200-2418 as an example of the level of detailed data that SoCalGas has provided in support of its labor forecast. 33

SoCalGas also has provided additional analytical support for its requested labor increases to ORA during discovery. In one response, (provided hereto as Appendix B), SoCalGas provided ORA with additional information on its incremental labor forecast. This response provides a comprehensive overview of SoCalGas' entire incremental labor request (without having to sift through all 272 pages of O&M workpapers) and documents all of SoCalGas' estimating assumptions and calculations that were utilized for its forecast.

In summary, SoCalGas provides sufficient detail and analysis in support of its request of incremental TY 2016 labor expenses of \$3.3 million.

2. SoCalGas' use of "professional judgement" and "management experience" is valid and supported

SoCalGas' labor request was forecasted, in part, using the professional judgement of its IT staff on a cost center by cost center basis.³⁵ As with any forecast, judgement and experience

³⁰ See Ex. SCG-18-WP.

³¹ See Ex. SCG-18-WP at page 36 through page 42.

³² Ex. SCG-18-R at CRO-16, lines 1 - 26.

³³ See generally, Appendix A attached hereto.

³⁴ SoCalGas Response to ORA-SCG-DR-048-PM1 question 11, provided hereto as Appendix B.

³⁵ SoCalGas Response to ORA-SCG-DR-048-PM1 question 11, attached hereto as Appendix B.

come into play when developing estimates. SoCalGas' IT O&M forecast methodology is no different. Identifying upward cost pressures (or downward relief in the form of cost savings) in an IT organization is not always directly correlated to a simple business metric or key performance indicator ("KPI"), such as meter count or customer growth. Furthermore, not all IT costs can be linked to specific business transactions and/or activity levels or forecasted using a simple arithmetic-based method.

Instead, IT forecasting and planning typically consists of experienced IT professionals taking a wide variety of factors into consideration when developing an IT-related cost estimate, such as an understanding of industry technology trends, hardware and software computing capabilities, scope of specific operations, maintenance and support activities, evolving business priorities, changing regulatory landscape, and/or workforce skillset needs. This is typically done based on factors, such as the requirements of the project, staff's experience with implementing similar projects and discussions with impacted operating groups. This analysis is included as part of SoCalGas IT's project approval process and is taken into account when an assessment of a project for approval is performed.

ORA asserts that "SCG's reliance on 'professional judgment' and 'management experience' to forecast incremental labor expenses provides the Commission no analytical basis or data to evaluate or determine the reasonableness of SCG's request." Nowhere in its testimony does ORA dispute that "professional judgment" and "management experience" are tools when forecasting labor expenses. In fact, SoCalGas' use of professional judgement and management experience is an acceptable forecast methodology in a GRC, according to the guidelines governing these proceedings. ³⁷

Contrary to ORA's assertion, SoCalGas provides sufficient support describing how it used its IT staff's judgement and experience, to the extent applicable, when developing its forecasted labor request. For example, in the workpapers for cost center 2200-2418, SoCalGas explains how it used its staff's judgement and experience when forecasting the need for incremental full-time equivalents ("FTEs") associated with a capital project implementation:³⁸

³⁶ Ex. ORA-15, at 28, lines 10-12.

³⁷ Rate Case Plan, as updated by D.07-07-004, Appendix A, at A31 (stating that "Where judgment is involved in setting an estimate level" the applicant must "explain why that particular level was adopted"). ³⁸ Ex. SCG-WP-18, attached hereto as Appendix A, at page 40 of 272.

8.7 incremental FTEs related to capital project implementations in 2015 and in 2016. Assumes 96% O&C ratio and \$100k average salary plus 10k per employee in associated NL costs (9 employees).

Three assumptions from this statement contribute to the increased forecast – the number of FTEs projected, the amount of time to be spent on operational activities and assumed average salary. The O&C [Operating & Clearing] ratio and average salary figures are numbers that are calculated based on data that was available from SoCalGas' financial systems. Professional judgement and management experience were used to project the number of required FTEs. In this example, the FTE's projected were developed by project managers who identified increased IT support needs due to the implementation of their capital projects. The use of professional judgement and management experience, as in this case, to forecast FTEs, is typically done based on factors such as the requirements of the project, experience with implementing similar projects and discussions with impacted operating groups. This analysis is included as part of SoCalGas IT's project approval process and is taken into account when an assessment of the project for approval is performed. Controls and/or checkpoints of this type are methods implemented to ensure that IT costs are effectively managed across the division.

In summary, SoCalGas provides a sufficient analytical basis and data to demonstrate the reasonableness of SoCalGas' use of "professional judgment" and "management experience" to forecast labor expenses.

C. O&M Non-Labor Forecasts

1. Undisputed Costs – O&M Non-Labor

ORA agreed with SoCalGas' forecast for Non-Labor O&M.³⁹ The Commission should adopt SoCalGas' TY 2016 incremental forecast of \$1.4 million, for a total of \$3.6 million, as reasonable.

IV. REBUTTAL TO PARTIES' CAPITAL PROPOSALS

A. ORA did not challenge the merits or implementation timing of any IT capital projects proposed by SoCalGas

ORA recommends reduced capital expenditures for SoCalGas in 2014 and 2015, 40 but it fails to provide any support for its recommendation based on the individual merits or details of

³⁹ Ex. ORA-15 at 4, lines 1-2.

⁴⁰ Ex. ORA-15 at 34, lines 10-12.

any particular IT capital project proposed by SoCalGas. 41

SoCalGas' 2014-2016 IT capital request is sufficiently supported by project-by-project information. SoCalGas has provided over 800 pages of detailed capital workpapers, representing 146 capital projects. SoCalGas' capital workpapers specifically identify the types of investments needed for the forecast period. SoCalGas also included forecasted in-service dates for each project listed in the SoCalGas IT 2014-2016 capital forecasts. In my Direct Revised Testimony, I also provide individual narratives in support of the 24 largest SoCalGas IT-sponsored individual capital projects.

B. Disputed Costs - 2015 Capital Expenditures

ORA recommends 2015 capital expenditures of \$99.8 million, which is \$20.1 million less than SoCalGas' 2015 forecast of \$119.9 million. ORA's recommended reduction is specific to SoCalGas IT-sponsored projects and does not dispute forecasts for business unit-sponsored projects that utilize IT capital funding. ORA recommends funding of \$48.6 million in IT projects, equal to the highest recorded capital spending on IT projects from 2009-2014, as opposed to \$68.7 million requested by SoCalGas.

When making its recommendation, ORA does not question the merit of any individual IT capital project, but rather arbitrarily recommends that the Commission adopt a level of funding based on the highest year of historical capital expenditures. ORA does not offer any rationale for this forecasting methodology other than "approving 2015 capital expenditures for twice the amount of capital spent in 2014 appears unreasonable." Much like O&M, capital spending within IT does not always follow historical averages or linear trends, and instead is lumpy in nature. Occasionally, there are significant investments required to replace or update large scale systems or services. This is the case for the large increase in SoCalGas' 2015 capital forecast where two significant investments planned within the IT portfolio account for \$33.9 million of the \$68.6 million requested by SoCalGas:

⁴¹ Ex. ORA-15 at 34, line 9 through page 36, line 19.

⁴² See also Ex. SCG-18-R at CRO-19, line 16 through CRO-34, line 13.

⁴³ See generally, Ex. SCG-18-CWP-R.

⁴⁴ SEU Master Data Request, Chapter 11 Q24B, provided hereto as Appendix C.

⁴⁵ Ex. SCG-18-R at CRO-22, line 24 through CRO-34, line 13.

⁴⁶ Ex. ORA-15 at 4, lines 13-18.

⁴⁷ Ex. ORA-15 at 37, lines 1-3 (Table 15-17).

⁴⁸ Ex. ORA-15 at 36, lines 5-6.

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SoCalGas Field Area Network (\$17.8 million in 2015, \$1.4 million 2016)

SoCalGas plans to build and place in service by TY 2016 the SoCalGas Field Area Network. This is a suite of private communication infrastructures supporting field voice communication for Customer Service Field, Distribution & Transmission and Storage. It includes a Land-Mobile-Radio ("LMR") network and voice dispatch console system. The console systems are end-of-life and either already are, or will soon be, without vendor support. The dispatch system is limited to a finite number of console positions that no longer meet the needs of the business. The radio system also requires the use of other legacy network infrastructure that needs to be retired from the environment. These systems are critical to business operations, especially during emergencies, as the primary voice channel during incident management, priority work orders and emergency response. The call recording system used by dispatch is also end-of-life and incompatible with newer dispatch console systems. Communication for fixed assets in the field, including remote terminal units ("RTU") on pipelines, currently served by AT&T 3002 circuits needs to be addressed due to aged infrastructure and lack of investment by AT&T. A digital LMR and Internet Protocol ("IP")-based console system has been evaluated as the solution.⁴⁹

Converged Computing Infrastructure (\$16.1 million in 2015)

The requests and needs of business units are dynamic and often require computing infrastructure to be delivered quickly. Current 'just-in-time' infrastructure purchasing is not nimble enough to meet the needs of clients for small-to-medium sized projects or for organic growth of existing computing environments as data volume increases. Existing computing systems will continue to reach vendor end-of-life and end-of-support dates and will need to be replaced or upgrade to provide reliable and available IT systems. This Converged Computing Infrastructure project will provide on-demand and elastic computing capacity to meet business needs without the delays associated with just-intime infrastructure purchases. This project will increase the capacity and functionality of the computing self-provisioning portal empowering clients to fulfill their computing requests without involving the IT infrastructure department, resulting in a reduced delivery time. Aging systems will be replaced or upgraded providing higher reliability and performance for business applications as systems reach end-of-life or end-of-support. As aging systems are replaced or upgraded, annual maintenance costs, required data center floor space, and power consumption will all be reduced. 50

A large portion of the projected costs for these two projects are hardware ("HW") purchases. It is reasonable for IT to achieve higher spending levels when these types of HW projects are proposed. To illustrate, Table CRO-5 shows that the two highest years of capital spending (2009 and 2013) included significant hardware investment as compared to the total capital spending, 11% and 26% respectively:

Ex. SCG-18-R at CRO-28, lines 1 - 18.
 Ex. SCG-18-R at CRO-29, lines 6 -22.

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Table CRO-5 Historical Project Hardware Costs as a % of Total Capital Project Spending \$2013 (in millions)⁵¹

	Ψ2015	(111 11111110113	'/		
	2009	2010	2011	2012	2013
Hardware Cost	\$6.3	\$1.1	\$1.3	\$4.2	\$15.6
All Direct Cost (incl.					
HW)	\$55.7	\$49.6	\$45.1	\$37.7	\$59.9
HW % of All Cost	11%	2%	3%	11%	26%

Furthermore, ORA's recommendation for SoCalGas' 2015 Capital should not be adopted because it does not reflect the fact that several of the capital projects SoCalGas had forecasted in 2014 have actually been moved into 2015 (or even 2016). Table CRO-6 lists those capital projects, which had been included in SoCalGas' forecasted 2014 capital projects but will now require funding in SoCalGas' 2015 capital plan instead.

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⁵¹ Hardware costs related to IT capital projects were provided to ORA in SoCalGas' Response to ORA-SCG-DR-029-PM1 question 5, attached hereto as Appendix D.

Table CRO-6 2014 Capital Project Variance

WP#	Project Name	2014 (2013\$ 0	00s)		Revised	Explanation
		GRC Forecast	Actuals ⁵²	Variance	In-Service Date	
772X	Data Center Network Rebuild	4,661	679	(3,982)	12/31/2015	Postponed implementation due to business priorities and weather conditions.
770A E	Server Replacement - AIX Retirement	2,351	1,569	(782)	5/31/2015	Delayed due to dependencies on Data Center Network Rebuild project.
770A G	ROWS Refresh Out of Warranty Servers.	4,520	3,748	(772)	12/31/2015	Delayed due to dependencies on Data Center Network Rebuild project.
770C	End Point Security	2,541	45	(2,496)	9/30/2015	Delay in vendor negotiations pushed equipment acquisition into 2015.
776B	Business Planning Simulation (BPS) Replacement Project	1,860	631	(1,229)	9/30/2015	Delay in vendor selection and contract negotiations.
810B	SCG CPD Enhancement Phase 1	11,479	8,783	(2,696)	3/31/2015	Ramping up vendor consulting services delayed 2014 deliverables.
780A	Identity & Access Management, Phase 2 – 4	2,678	639	(2,039)	12/31/2016	Delay in phase approval.
772 W	Private Network Expansion and Refresh	2,797	0	(2,797)	12/31/2015	Project started in 2015.
776D	Click and SAP Disaster Recovery Tier Upgrade	1,053	0	(1,053)	06/01/2016	Project started in 2015.
770B	Mobile Device Management Infrastructure	1,023	0	(1,023)	09/30/2015	Project started in 2015.
	Totals	34,963	16,094	(18,869)		

The IT capital program is managed as a portfolio. There will be shifts in scope, schedules and budgets across the suite of projects being proposed in SoCalGas' capital testimony. These

⁵² SoCalGas provided information about its 2014 capital recorded spending to ORA on March 13, 2015.

adjustments are managed by the IT Project Management Office in accordance with guidelines 1 2 established by Central Business Planning. ORA's recommendation to reduce SoCalGas' 3 forecasts based on a one year view of recorded costs does not take into consideration the 4 adjustments made by SoCalGas' capital committees to address changing priorities and individual 5 project deviations from plan. As shown in Table CRO-6, ORA's recommendation to reduce SoCalGas' 2015 capital expenditure forecast by \$20.1 million would severely hamper SoCalGas' 6

ability to achieve its multi-year capital project plan, and it should be rejected.

C. **Undisputed Costs - 2016 Capital Expenditures**

ORA agreed with SoCalGas' forecast for 2016 Capital expenditures. 53 The Commission should adopt SoCalGas' forecast of \$104.8 million as reasonable.

V. INFORMATION SECURITY

A. Labor O&M

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ORA agreed with SoCalGas' forecast for Information Security labor O&M.⁵⁴ The Commission should adopt SoCalGas' TY 2016 incremental forecast of \$140,000 for a total of \$761,000 as reasonable.

В. Tracking of Cybersecurity and Risk Management expenditures

SoCalGas respectfully recommends that the Commission decline ORA's suggestion⁵⁵ to track and report expenses for Cybersecurity and Risk Management efforts in the next GRC. Cybersecurity and Risk Management efforts in the information technologies area are varied and address many different systems, applications, infrastructure components and network topology. Additionally, many efforts that provide risk management benefits also provide companion benefits, such as increased system reliability and robustness, which make the risk management aspect of those efforts difficult to unwind. Tracking and reporting is both administratively burdensome and imprecise, and may in and of itself be revelatory of the nature and types of measures undertaken which may unintentionally compromise the Cybersecurity and Risk Management measures employed.

Furthermore, the Risk Decision, D.14-12-025, adopts a Risk Spending Accountability Report requirement, which will have the effect of tracking risk-related spending, including spending on cybersecurity and risk management, in some fashion. SoCalGas anticipates that the

⁵³ Ex. ORA-15 at 4, line 19. ⁵⁴ Ex. ORA-15 at 31, lines 12-14

⁵⁵ Ex. ORA-15 at 31, lines 22-24 through 32, line 1.

1 Safety Model Assessment Proceeding ("SMAP") and subsequent Risk Assessment Mitigation 2 Phase ("RAMP") filings will help shape the content of the Risk Spending Accountability Report. 3 SoCalGas believes any discussions concerning the tracking of cybersecurity and risk 4 management costs are better suited to take place during the SMAP and RAMP proceedings, 5 instead of the GRC. 6

VI. **CONCLUSION**

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SoCalGas has addressed the proposed recommendations presented by ORA and demonstrated that ORA's proposals are not warranted. In summary, SoCalGas has demonstrated the following:

- SoCalGas' TY 2016 O&M Labor forecast is reasonable;
- SoCalGas' TY 2016 O&M Non-Labor forecast is reasonable;
- SoCalGas' Capital Expenditure forecasts are reasonable;
- SoCalGas' Information Security Labor O&M and Non-Labor forecasts are reasonable; and
- Tracking of Cybersecurity and Risk Management expenditures should be addressed in the upcoming SMAP filings.

Accordingly, SoCalGas' forecast for TY 2016 IT O&M labor and non-labor expenses and SoCalGas' IT Capital Expenditure forecasts should be adopted by the Commission.

This concludes my prepared rebuttal testimony.

APPENDIX TO REBUTTAL TESTIMONY OF CHRISTOPHER R. OLMSTED ON BEHALF OF SOCALGAS INFORMATION TECHNOLOGY

Appendix Attachments

- A. SoCalGas Shared Services Workpaper 2200-2418.000 Director SCG Applications Services
- B. SoCalGas Response to Data Request ORA-SCG-DR-048-PM1, Question 11
- C. SoCalGas Response to ORA Master Data Request Chapter 11 Information Technology, Question 24.B.
- D. SoCalGas Response to Data Request ORA-SCG-DR-029-PM1, Question 5

Appendix A

SoCalGas Shared Services Workpaper 2200-2418.000 – Director – SCG Applications Services

Beginning of Workpaper 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Activity Description:

This cost center is for the support of the SCG IT applications organization. This is a director cost center.

Forecast Explanations:

Labor - Base YR Rec

This method is most appropriate because the base year most accurately represents the current state of the IT workpapers. Historical costs have fluctuated between various workgroups as a result of either internal organizational changes, transfers of responsibilities, or shifting of cost drivers from one area of the IT department to another.

Non-Labor - Base YR Rec

This method is most appropriate because the base year most accurately represents the current state of the IT workpapers. Historical costs have fluctuated between various workgroups as a result of either internal organizational changes, transfers of responsibilities, or shifting of cost drivers from one area of the IT department to another.

NSE - Base YR Rec

N/A

Summary of Results:

				ln 2013\$ (00	0) Incurred (Costs		
		Adju	sted-Recor	Adj	Adjusted-Forecast			
Years	2009	2010	2011	2014	2015	2016		
Labor	0	0	0	131	190	190	624	1,057
Non-Labor	0	0	0	167	18	18	63	108
NSE	0	0	0	0	0	0	0	0
Total	0	0	0	298	208	208	687	1,165
FTE	0.0	0.0	0.0	0.8	1.2	1.2	5.6	9.9

Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub: 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Cost Center Allocations (Incurred Costs):

Directly Retained
Directly Allocated
Subj. To % Alloc.
Total Incurred
% Allocation
Retained
SEU
CORP
Unreg

	2013 Adju	sted-Reco	rded		2014 Adjusted-Forecast					
Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE	
0	8	0	8	0.00	0	8	0	8	0.00	
0	0	0	0	0.00	0	0	0	0	0.00	
190	10	0	200	1.15	190	10	0	200	1.15	
190	18	0	208	1.15	190	18	0	208	1.15	
85.55%	85.55%				95.90%	95.90%				
11.73%	11.73%				3.77%	3.77%				
2.72%	2.72%				0.33%	0.33%				
0.00%	0.00%				0.00%	0.00%				

Directly Retained
Directly Allocated
Subj. To % Alloc.
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	2015 Adju	sted-Fore	cast		2016 Adjusted-Forecast				
Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
0	8	0	8	0.00	0	8	0	8	0.00
0	0	0	0	0.00	0	0	0	0	0.00
624	55	0	679	5.55	1,057	100	0	1,157	9.85
624	63	0	687	5.55	1,057	108	0	1,165	9.85
95.90%	95.90%				95.90%	95.90%			
3.77%	3.77%				3.77%	3.77%			
0.33%	0.33%				0.33%	0.33%			
0.00%	0.00%				0.00%	0.00%			

Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub: 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2013

The weighted average of all Dept. cost centers Shared Servcice Allocations was taken of all cost centers under the IT SCG Application department. The weighted average of all Dept. cost centers Shared Servcice Allocations reflects the level of support provided to each affiliate by this cost center.

Cost Center Allocation Percentage for 2014

The weighted average of all Dept. cost centers Shared Servcice Allocations was taken of all cost centers under the IT SCG Application department. The weighted average of all Dept. cost centers Shared Servcice Allocations reflects the level of support provided to each affiliate by this cost center.

Cost Center Allocation Percentage for 2015

The weighted average of all Dept. cost centers Shared Service Allocations was taken of all cost centers under the IT SCG Application department. The weighted average of all Dept. cost centers Shared Service Allocations reflects the level of support provided to each affiliate by this cost center.

Cost Center Allocation Percentage for 2016

The weighted average of all Dept. cost centers Shared Servcice Allocations was taken of all cost centers under the IT SCG Application department. The weighted average of all Dept. cost centers Shared Servcice Allocations reflects the level of support provided to each affiliate by this cost center.

Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub: 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Forecast Summary:

In 2013 \$(000) Incurred Costs										
Forecast	t Method	Bas	se Foreca	st	Forec	ast Adjust	ments	Adjus	ted-Forec	ast
Years	5	2014	2015	2016	2014	2015	2016	2014	2015	2016
Labor	Base YR Rec	190	190	190	0	434	867	190	624	1,057
Non-Labor	Base YR Rec	18	18	18	0	45	90	18	63	108
NSE	Base YR Rec	0	0	0	0	0	0	0	0	0
Tota	I	208	208	208	0	479	957	208	687	1,165
FTE	Base YR Rec	1.2	1.2	1.2	0.0	4.4	8.7	1.2	5.6	9.9

Forecast Adjustment Details:

Year/Expl.	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	FTE	Adj Type
2014 Total	0	0	0	0	0.0	
2015	434	45	0	479	4.4	1-Sided Adj

8.7 incremental FTEs related to capital project implementations in 2015 and in 2016. Assumes 96% O&C ratio and \$100k average salary plus \$10k per employee in associated NL costs (9 employees).

The implementation of capital projects can include new functions/features/services that increase the support requirements on application support teams. The FTEs represented in this line item are the accumulation of incremental needs that were projected as part of concept document and/or business case development.

2015 Total	434	45	0	479	4.4		
2016	867	90	0	957	8.7	1-Sided Adj	

8.7 incremental FTEs related to capital project implementations in 2015 and in 2016. Assumes 96% O&C ratio and \$100k average salary plus \$10k per employee in associated NL costs (9 employees).

The implementation of capital projects can include new functions/features/services that increase the support requirements on application support teams. The FTEs represented in this line item are the accumulation of incremental needs that were projected as part of concept document and/or business case development.

957 8.7	0	90	867	2016 Total
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Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub: 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Determination of Adjusted-Recorded (Incurred Costs):

Determination of Aujustes	2009 (\$000)	2010 (\$000)	2011 (\$000)	2012 (\$000)	2013 (\$000)
Recorded (Nominal \$)*					
Labor	0	0	0	110	163
Non-Labor	0	0	0	164	18
NSE	0	0	0	0	0
Total	0	0	0	274	181
FTE	0.0	0.0	0.0	0.7	1.0
Adjustments (Nominal \$) *	*				
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nomin	nal \$)				
Labor	0	0	0	110	163
Non-Labor	0	0	0	164	18
NSE	0	0	0	0	0
Total	0	0	0	274	181
FTE	0.0	0.0	0.0	0.7	1.0
Vacation & Sick (Nominal	\$)				
Labor	0	0	0	18	27
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	18	27
FTE	0.0	0.0	0.0	0.1	0.2
Escalation to 2013\$					
Labor	0	0	0	3	0
Non-Labor	0	0	0	4	0
NSE	0	0	0	0	0
Total	0	0	0	6	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Const	•				
Labor	0	0	0	131	190
Non-Labor	0	0	0	167	18
NSE	0	0	0	0	0
Total	0	0	0	298	208
FTE	0.0	0.0	0.0	0.8	1.2

^{*} After company-wide exclusions of Non-GRC costs

^{**} Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Area: INFORMATION TECHNOLOGY

Witness: Christopher R. Olmsted

Category: A. Applications
Category-Sub: 1. Applications

Cost Center: 2200-2418.000 - DIRECTOR - SCG APPLICATIONS SERVICES

Summary of Adjustments to Recorded:

		In Nominal \$ (000)	Incurred Costs		
Years	2009	2010	2011	2012	2013
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

Year/Expl.	<u>Labor</u>	<u>NLbr</u>	NSE	<u>FTE</u>	Adj Type	From CCtr	RefID
2009 Total	0	0	0	0.0			
2010 Total	0	0	0	0.0			
2011 Total	0	0	0	0.0			
2012 Total	0	0	0	0.0			
2013 Total	0	0	0	0.0			

Appendix B

SoCalGas Response to Data Request ORA-SCG-DR-048-PM1, Question 11

ORA DATA REQUEST ORA-SCG-DR—048-PM1 SOCALGAS 2016 GRC – A.14-11-004 SOCALGAS RESPONSE DATE RECEIVED: JANUARY 26, 2015

DATE RESPONDED: FEBRUARY 9, 2015

- 11. Regarding SCG's response to SCG_Reponse_DEF-001-B, please update the Excel file to include the following information:
 - a. O&M decreases, including explanations for decreases.
 - b. Accounts where forecast has no change from recorded 2013 to TY2016.
 - c. A column with TY2016 total by account.

SoCalGas Response 11:

Please see attachment ORA-SCG-DR-048-PM1 Q11 Attachment.xlsx.

ORA-SCG-DR-048-PM1 Q11

O&M Reductions (item a)						O&M Reductions	(item a)					
O&M.						O&M	Ξ					
Assumptions		Estimate based upon a combination of microwave radio replacement (\$3k per unit) and microwave tower maintenance (approximately \$12k per microwave tower). There are approximately 60 microwave sites and 240 microwave radios within the SCG service territory.	1.4 incremental FTEs to support CI Engineering in 2014, continuing through 2016. Assumes 70% O&C ratio and \$100k average salary plus \$10k per employee (2 employees) in associated NL costs.	.2 incremental FTEs to support CPD in 2014, continuing through 2016. Assumes 20% O&C ratio and \$100k average salary. Additionally, includes CPD consulting/training NL costs (\$250k), based on 2014 estimated support levels, and a consolidation of CPD-related cost centers.			Assumptions	4 incremental FTEs to support new IT initiatives across the company in 2015 and in 2016. Assumes 81% O&C ratio and \$100k average salary plus \$10k per employee in associated NL costs.	Management estimate for average consulting engagement (4-6 months) to analyze networking capabilities across 160 manned and unmanned sites.	8.7 incremental FTEs related to capital project implementations in 2015 and in 2016. Assumes 96% O&C ratio and \$100k average salary plus \$10k per employee in associated NL costs (9 employees).	5.5 FTEs at \$100k per employee plus \$10k per employee (6 employees) in associated NL (split between 2015 and 2016). Assumes 91% O&C ratio.	2. 2 incremental FTEs to support new IT initiatives across the company in 2015 and in 2016. Assumes 72% O&C ratio and \$100k average salary plus \$10k per employee (2 employees) in associated NL costs.
2016 Total (Item c)	2,853	4,297	159	331	7,640	2016 Total	(Item c)	1,011	250	1,165	1,777	332
2016 adj.		250	159	290	669	2016	adj.	732	250	957	909	332
2015 adj.		250	159	290	669	2015 adj.		396	250	479	303	176
2014 adj. 2015 adj.		1	159	290	449	2014 adj. 2015 adj.		•	1		1	1
2013 2 Recorded	2,853	4,047	i	41	6,941		Recorded	279	i	208	1,171	1
Description of Adjustment (if any)		Increased Telecom Maintenance work to support aging infrastructure and improved reliability.	2 analysts to support CI Engineering	Adjustment for CPD costs to align with 2014 reorganizational changes				Labor & Non-labor costs associated with incremental employees that are part of the organic IT growth to support expanding programs, applications, & infrastructure.	Network Strategy Development - Develop a five-year network strategy and migration plan to leverage emerging technologies for improved reliability and performance of our network environment.	Incremental labor related to capital project implementations	3 replacement positions and 2 for Click 8 and 3 software developers and 1 build leader	Organic IT growth to support expanding programs application
Cost Center Name	IT Applications NSS	IT infrastructure NSS	IT Infrastructure NSS	IT Support NSS			Cost Center Name	DIRECTOR - COMPUTING INFRASTRUCTURE	DIRECTOR - COMPUTING INFRASTRUCTURE	DIRECTOR - SCG APPLICATIONS SERVICES	SCG WORK MANAGEMENT SERVICES	SCG WORK MANAGEMENT SERVICES
Category	Applications	Infrastructure	Infrastructure	IT Support			Category	Infrastructure	Infrastructure	Applications	Applications	Applications
Workgroup/ cost center	21T001.000	21T002.000	21T002.000	21T003.000		Workgroup/	cost center	2200-2406	2200-2406	2200-2418	2200-2445	2200-2445

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Organic IT growth to support expanding programs - 56 112 112	ital FTEs to suppo	1.1 incremental FTEs to support new IT initiatives across the company in 2015 and in 2016. Assumes 42% O&C ratio and \$100k average salary plus \$10k per employee (1 employee) in associated NL costs.	1.1 incremental FTEs to support new IT initiatives across the company in 2015 and in 2016. Assumes 42% O&C ratio and \$100k average salary plus \$10k per employee (1 employee) in associated NL costs. 1.8 incremental FTEs to support new IT initiatives across the company in 2015 and in 2016. Assumes 89% O&C ratio and \$100k average salary plus \$10k per employee (2 employees) in associated NL costs.
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Security

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Applications Applications Applications

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Applications

Applications

SCG Total

O&M Reductions (item a)

Infrastructure

Category

cost center

2200-2495

Workgroup/

Infrastructure

2200-2495

Appendix C

SoCalGas Response to ORA Master Data Request Chapter 11 – Information Technology, Question 24.B.

ORA MASTER DATA REQUEST SOCALGAS 2016 GRC – A.14-11-XXX SOCALGAS RESPONSE

DATE RECEIVED: AUGUST 8, 2014 DATE RESPONDED: AUGUST 8, 2014

- 24. List each capital project by name, department, direct, indirect, and job/budget and blanket code.
 - a. Show the amount of the requested expenditure in each forecast year and 5 years of historic capital data by job/budget and blanket code.
 - b. Provide a spreadsheet showing the date each project is schedule to become used and useful.

SoCalGas Response:

Please refer to the Attachment folder for Chapter 19.

- a. Please see SoCalGas MDR Ch. 11 Attachment to Q24A.
- b. Please see SoCalGas MDR Ch. 11 Attachment to Q24B.

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Code		2014	2015	2016	Labor	Non-Labor	Total	Labor	ZUIS Non-Labor	Total	Labor	ZUIB Non-Labor	Total	Completion
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00750.0	PT81420 M&I Compliance Reporti	801	0	0	119	682	801	0	0	0	0	0	0	7/31/2014
		801	0	0	119	682	801	0	0	0	0	0	0	
00751.0	PT81380 SAP SUPER USER PROVISI	17	0	0	17	0	17	0	0	0	0	0	0	3/31/2014
		17	0	0	17	0	17	0	0	0	0	0	0	
0.476.00	DTO4424 Columnia Discoult	0	c	c	į	,	i L	c	c	c	c	c	c	1,007,107,01
00/54.0	PIS1421 California Producers E	850	0 ;	0 (747	411	929	0	0	0	0	0	0	12/31/2014
	Gas and Electric Harmonization	0	1,253	0	0	0	0	391	862	1,253	0	0	0	12/31/2015
	Low OFO and EFO	0	926	0	0	0	0	309	647	926	0	0	0	12/31/2015
		658	2,209	0	247	411	658	700	1,509	2,209	0	0	0	
00756.0	PT81434 2016 GRC Results of Op	162	0	0	46	116	162	0	0	0	0	0	0	12/31/2014
		162	0	0	46	116	162	0	0	0	0	0	0	
00260.0	PT14853 ITSM Tool Optimization	689	477	0	179	510	689	177	300	477	0	0	0	3/31/2015
	PT15824 SCG Desktop Hardware R	0	0	7,072	0	0	0	0	0	0	432	6,640	7,072	
	PT15868 SE 2015 Mainframe Expa	0	0	1,818	0	0	0	0	0	0	0	1,818	1,818	4/30/2016
	PT16934 eGRC Infrastructure Re	0	0	1,990	0	0	0	0	0	0	190	1,800	1,990	12/31/2016
	PT16935 Forensics Lab Infrast	0	0	1,822	0	0	0	0	0	0	122	1,700	1,822	12/31/2016
	PT81440 Data Center Network Co	1,133	0	0	280	853	1,133	0	0	0	0	0	0	3/31/2014
		1,822	477	12,702	459	1,363	1,822	177	300	477	744	11,958	12,702	
00762.0	PT14872 SCG 2014 Active Direct	0	865	0	0	0	0	139	726	865	0	0	0	12/31/2015
	PT81355 SCG WAN REBUILD PH IV	778	0	0	261	517	778	0	0	0	0	0	0	3/31/2014
	PT81442 SE Network Attached St	1,148	0	0	128	1,020	1,148	0	0	0	0	0	0	3/31/2014
	PT81443 SEu Wireless/Sempra Vi	662	0	0	269	393	662	0	0	0	0	0	0	3/31/2014
		2,588	865	0	658	1,930	2,588	139	726	865	0	0	0	
0.0264.0	DT14843 Customer Data Control	r,	527	c	r.	c	n L	527	c	527	c	c	c	8/31/2015
	PT14875 Collections Optimizati	374	0	0 0	767	107	374	(25)	0 0	(2)	0 0	0 0	o c	10/31/2014
	PT14877 Collections Optimizati	647	257	o c	282	365	647	136	121	257	0 0	0 0	o c	4/30/2014
	PT14912 3rd Party Data Request	0	693	0	0	0	0	282	411	693	0	0	0	9/30/2015
	PT14914 Customer Order Communi	241	913	0	131	110	241	570	343	913	0	0	0	8/31/2015
	PT15878 Collections Optimizati	0	0	3,367	0	0	0	0	0	0	1,067	2,300	3,367	12/31/2016
	PT15925 Voice Recording and QA	0	403	0	0	0	0	21	382	403	0	0	0	7/31/2015
	PT16813 CIS Frontend Architect	0	0	1,544	0	0	0	0	0	0	1,044	200	1,544	12/31/2016
	PT81418 Customer Data Controls	1,720	0	0	926	764	1,720	0	0	0	0	0	0	12/31/2014
		3,037	2,793	4,911	1,691	1,346	3,037	1,536	1,257	2,793	2,111	2,800	4,911	
0			000							0			(1,007,007,0
00/66.0	PI14869 NAESB EDIX Upgrade	0 ,	987	o 0	0 00	0 ,	o ;	797	77	987	0 (0 0	0 0	6/30/2015
	P1148/3 SAP Logistics Mobility	1,454	68	0	203	1,251	1,454	45	44	88	0	0	0	3/31/2015
		1,454	375	0	203	1,251	1,454	307	89	375	0	0	0	
00768.0	PT14854 SAP FCC and BI Archivi	802	C	C	794	508	802	C	C	C	C	C	C	12/31/2014
	PT14855 Business Objects Upgra	0	648	0 0	t 0	8 0	0 0	348	300	648	0 0	0 0	0 0	12/31/2015
	PT15804 Microsoft Business Int	0 0	5	461	0 0	0 0	0 0	2 0	3 0	} <	261	200	461	12/31/2016
		802	648	461	294	208	208	348	300	648	261	200	461	
		3	5	1	101	2	400	2	3	2	107	707	101	

MDR CHA	MDR CHAPTER 11 Q.24.B. ATTACHMENT													
Budget	Budget Code		Summary			2014			2015	-	- 1	2016		Completion
Code	Description	2014	2015	2016	Labor	Non-Labor	lotal	Labor	Non-Labor	lotal	Labor	Non-Labor	lotal	Date
007700	PT14834 SEu Web-Audio Conferen	264	1,089	0	70	194	264	139	950	1,089	0	0	0	12/31/2015
	PT15932 Web Application Databa	0	0	3,129	0	0	0	0	0	0	451	2,678	3,129	12/31/2016
	PT81316 WINDOWS 7 PLATFORM REP	1,409	0	0	408	1,001	1,409	0	0	0	0	0	0	12/31/2014
	PT81416 ENTERPRISE MESSAGING I	978	0	0	244	734	978	0	0	0	0	0	0	3/31/2014
	PT81417 EDIX Enhancement - Pha	397	123	0	367	30	397	123	0	123	0	0	0	3/31/2015
	PT81426 SERVER REPLACEMENT-AIX	2,351	547	0 0	502	1,849	2,351	227	320	547	0 0	0 0	0 0	3/31/2014
	P181433 Enterprise Voice Syste	214	0 (0 (119	95	214	o í	0 (0	0 (0	0 (3/31/2014
	ROWS Refresh Out of Warranty S	4,520	0 707 1	0 0	648	3,8/2	4,520	0 210	0 700 1	0 707 1	0 0	0 0	0 0	12/31/2014
		0 0	1,734 O	695	0 0	0 0	0 0	QT/	1,004	1,734 O	795	400	695	12/31/2015
	PT201410 SEu Call Recording Re	786	0	0	136	650	786	0	0	0	0	0	0	12/31/2014
	PT201433 Backup Services Enhan	849	0	0	66	750	849	0	0	0	0	0	0	12/31/2014
	PT14835 Mobile Device Manageme	1,023	87	0	566	757	1,023	87	0	87	0	0	0	1/31/2015
	PT14838 End Point Security Pro	2,541	532	0 (191	2,350	2,541	232	300	532	0 (0 0	0 (3/31/2015
	PT14839 Logging Intrastructure	0	2,769	0 0	o 5	o ;	0 88	144	2,625	2,769	0 0	0	0 0	12/31/2015
	P114846 Gas SCADA Perimeter Re	829	0 250	0 0	104	725	829	o c	0 250	0 0	o c	0 250	0 0	12/31/2014
	PT14867 ECC 2.0 Project	000	1.395	930 616	0 0	0	0	510	330	1.395	116	200	616	12/31/2016
	PT14889 SEu Enterprise Call Re	341	0	0	73	268	341	0	0	0	0	0	0	8/31/2014
	PT51809 SEu CCC Avaya System R	0	0	753	0	0	0	0	0	0	153	009	753	12/31/2016
	PT15844 Web Application Firewa	0	0	1,511	0	0	0	0	0	0	146	1,365	1,511	12/31/2016
	PT15874 Enterprise Risk and Co	0	0	629	0	0	0	0	0	0	515	144	629	12/31/2016
	PT15879 Enterprise Social Comp	0	0	290	0	0	0	0	0	0	162	428	290	6/30/2016
	PT15880 ITCS - App-V and UE-V	0	809	0	0 (0 (0 (348	260	809	0 8	0 0	0	12/31/2015
		0	0	1,296	0 0	0 0	0 0	0 6	0 0	0 50	969	009	1,296	12/31/2016
	PT15881 SCG Video-enabled Coll	0	394	0 0	0 0	0 0	0 0	108	286	394	0 0	0 0	0 0	6/30/2015
	P115882 SEU TelePresence Opgra	0 0	1,097	0 711	0 0	-	o c) o	066	1,097	o [ם מ	0 117	6/30/2015
	PT15896 SE SAN Storage Expansi	0 0	o c	6.052	0 0	0 0	0 0	0 0	0 0	o c	5. 5.7	6000	6.052	12/31/2016
	PT15899 SE 2015 VMware View Vi	0 0	1.514	186	0 0	0 0	0 0	278	1.236	1.514	186	000,0	186	3/31/2016
	PT15900 SCG Infrastructure Roo	0	81	0	0	0	0	46	35	81	0	0	0	12/31/2015
	PT16892A SE Infrastructure Ena	0	0	908	0	0	0	0	0	0	0	908	908	12/31/2016
	PT16892B SE SCOM 2012 Upgrade	0	0	571	0	0	0	0	0	0	371	200	571	12/31/2016
	PT16896B SE SAN Storage Expans	0	0	836	0	0	0	0	0	0	36	800	836	12/31/2016
	PT16899B SE 2016 VMware View V	0	0	2,632	0	0	0	0	0	0	232	2,400	2,632	12/31/2016
	PT15930 IPS Refresh	0 0	0 0	2,887	0 0	0 0	0 0	0 0	0 0	0 0	262	2,625	2,887	12/31/2016
	r 12331 Source code Security	16.052	12 200	24 505	711	12 67	16.052	010 6	250	12.20	602	700	20.5	0102/16/21
		10,832	12,380	24,595	3,227	13,625	16,852	3,059	9,321	12,380	3,934	70,661	24,595	
00772.0	PT14837 SCG Field Area Network	0	7,095	0	0	0	0	715	6,380	7,095	0	0	0	12/31/2015
		0	10,779	1,429	0	0	0	1,429	9,350	10,779	1,429	0	1,429	12/31/2016
	PT14849 SCG CI Small Cap	200	200	200	0	200	200	0	200	200	0	200	200	
	PT14850 SE System Management a	0	2,140	1,003	0	0	0	1,740	400	2,140	603	400	1,003	12/31/2015
	PT14851 SE Local Area Network	2,478	3,450	4,164	378	2,100	2,478	1,350	2,100	3,450	2,026	2,138	4,164	12/31/2016
	PT14852 SE Enterprise Applicat	0	675	0	0	0	0	390	285	675	0	0	0	12/31/2015
	PT14871 SCG GAS SCADA convert	0	0	1,499	0 0	0 (0 (0 %	0	0 20	347	1,152	1,499	12/31/2016
	P115883 SE Converged Computing	0 0	8,536	o 0	o 0	0 0	o 0	36	8,500	8,536	0 0	0 (0 0	12/31/2015
	DT15884 CF Backin Systems	0 0	7,536	0 202	o c	o c	0 0	g C	005'/	0,536	۰ ر	0 6	0 6	12/31/2016 6/30/2016
	FILDOOM SE BRENGH SYSTEMS	٥)	101	כ	>	>	>)	>	1	2	40/	01 out 20 to

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Budget	Budget Code Description	2014	Summary 2015	2016	Labor	2014 Non-Labor	Total	Labor	2015 Non-Labor	Total	Labor	2016 Non-Labor	Total	Completion Date
	PT15891 SCG Communications She	0	244	0	0	0	0	104	140	244	0	0	0	9/30/2015
	PT15891B SE EWE Self Service W	0	0	236	0	0	0	0	0	0	186	20	236	12/31/2016
	PT15891C SE Third Data Center	0	0	910	0	0	0	0	0	0	135	775	910	12/31/2016
	PT15911 SCG Communications She	0	383	0	0	0	0	∞	375	383	0	0	0	9/30/2016
	PT16884 SE Backup Systems	0	0	356	0	0	0	0	0	0	36	320	356	12/31/2016
	PT16891 2016 SCG Communication	0	0	821	0	0	0	0	0	0	21	800	821	12/31/2016
	PT15893A SE Wide Area Network	0 ;	0 0	4,464	0 ¦	0 8	0 !	0 ;	0 ;	0 ;	464	4,000	4,464	12/31/2016
	PT16893B SCG Communication She	145	193	0 !	56	88 °	145	53	140	193	0 :	0	0 :	9/30/2015
	PT16894A SCG Private Network E	0 ,	ם גנ	2,148	၁ မ	0 8	0 ,	၁ [o	ם גנ	348	1,800	2,148	12/31/2016
	PT169954 SE Bomoto Accounting	143	767	0 6	90	60	143	° C	1/3	767	0 0		707	3/30/2013
	PI 10693A SE REMOTE ACCESS SELV DT81389 CG BATTERV REDI ACEMEN	170	o c	/6/	o %	- Ç	0 1	o c	o c	o c	767	000	/6/ -	3/31/2016
	PT81414 CORF NETWORK DESIGN	536	0 0	0 0	207	335	536	0 0	0 0	0 0	o c	0 0	o c	3/31/2014
	PT81432 PRIVATE NETWORK EXPANS	2,797	0	0	447	2,350	2,797	0	0	0	0	0	0	12/31/2014
		0	1,661	0	0	0	0	261	1,400	1,661	0	0	0	12/31/2015
	Data Center Network Rebuild	4,661	0	0	245	4,416	4,661	0	0	0	0	0	0	12/31/2014
		11,411	43,424	19,029	1,469	9,942	11,411	6,175	37,249	43,424	5,894	13,135	19,029	
00773.0	PT81403 TELECOMMUNICATIONS EXP	693	0	0	203	490	693	0	0	0	0	0	0	12/31/2014
		203			200	000	603		, c					
		693	0	0	203	490	693	0	0	0	0	0	0	
00774.0	PT14803 - Envoy Next Generatio	41	2,048	1,664	41	0	41	348	1,700	2,048	464	1,200	1,664	12/31/2016
	PT14825 - Email Campaign Manag	0	200	0	0	0	0	0	200	200	0	0	0	6/30/2014
		112	876	0	24	88	112	143	733	876	0	0	0	6/30/2015
	PT14829 - socalgas.com technol	1,636	1,349	0	41	1,595	1,636	35	1,314	1,349	0	0	0	12/31/2015
	PT15823 SEU Customer Contact C	0	0	601	0	0	0	0	0	0	252	349	601	12/31/2016
	PT 15828 In House EDI X12 Serv	0	456	108	0	0	0	147	309	456	63	45	108	5/31/2016
	PT14827 C&I Next Generation Ph	336	2,453	0	73	263	336	201	2,252	2,453	0	0	0	12/31/2016
	PT15802 C&I Next Generation Ph	0	1,742	0	0	0	0	232	1,510	1,742	0	0	0	12/31/2015
		0	0	805	0	0	0	0	0	0	232	220	802	12/31/2016
	PT81439 ENVOY & MCS SYBASE DAT	1,761	0	0	651	1,110	1,761	0	0	0	0	0	0	12/31/2014
		0	937	0	0	0	0	237	200	937	0	0	0	12/31/2015
	PT81438 ENVOY MCS DATA CONTROL	0	617	12	0	0	0	217	400	617	12	0	12	1/31/2016
		525	0	0	377	148	525	0	0	0	0	0	0	12/31/2014
	PT81435 My Account Tech Refres	7,874	0	0	1,746	6,128	7,874	0	0	0	0	0	0	12/31/2014
		0 0	5,437	ם נ	0 0	0 0	0 0	1,662	3,775	5,437	0 0	0 0	0 5	12/31/2015
	DT91423 My Account Markilo 1C	0 570 1	740	667	716	1 057	0 270 1	^ب د	740	740	293		C67	3/31/2016
	PT81423 My ACCOUNT MODING IC	1,273	† 0	0 0	521	1,037	1,473	٥	t C	410	o c	0 0	0 0	12/21/2014
	t == 421 000 t2t10 =	1,742	151	0 0	127	1,221	1,74	. 6	98	151	0 0	0 0	o c	3/31/2015
		15,300	17,428	3,482	3.690	11.610	15,300	3.293	14.135	17.428	1.318	2.164	3.482	
00775.0	SCG Meter Reading Handheld Sys	0	244	6,673	0	0	0	234	10	244	523	6,150	6,673	12/31/2016
		0	244	6,673	0	0	0	234	10	244	523	6,150	6,673	
00776.0	PT - 14807 Click Upgrade	0	713	0	0	0	0	0	713	713	0	0	0	1/31/2015
		250	0	0	0	250	250	0	0	0	0	0	0	6/30/2014
		2,996	5,655	1,566	869	2,298	2,996	1,392	4,263	5,655	1,169	397	1,566	6/30/2016
	PT16860 GIS Gas Enhancements 2	0 0	0 27	7,377	0 0	0 0	0 0	0	0 200	0 27	800	6,577	7,377	12/31/2016
	Electronic Leak Survey	٥	1,548	Þ	כ	Þ	כ	348	1,200	1,548	0	0	כ	CT02/15/7T

MUK CHA	Budget Bridget Code		Cumman			7014			2015			2100	Ī	noi+clamo)
Code	Description	2014	2015	2016	Labor	Non-Labor	Total	Labor	Non-Labor	Total	Labor	Non-Labor	Total	Date
	PT14817 - Business Planning Si	1,425	0	0	0	1,425	1,425	0	0	0	0	0	0	12/31/2014
		435	859	0	244	191	435	406	453	859	0	0	0	12/31/2015
	PT14876 Shop Tracking System	86	0	0	0	86	86	0	0	0	0	0	0	7/31/2014
		909	785	569	352	254	909	209	276	785	254	15	569	7/31/2016
	PT14919 Click and SAP Disaster	1,053	0	0	217	836	1,053	0	0	0	0	0	0	12/31/2014
	PT14924 Enterprise GIS Uplift	0	1,295	413	0	0	0	143	1,152	1,295	43	370	413	12/31/2016
	PT15819 CPD Reporting Enhancem	0	1,116	1,087	0	0	0	116	1,000	1,116	87	1,000	1,087	12/31/2016
	PT15820 SCG Maintenance and In	0	1,186	1,186	0	0	0	186	1,000	1,186	186	1,000	1,186	12/31/2016
	PT15821 Field Force Reporting	0	0	1,143	0	0	0	0	0	0	63	1,050	1,143	12/31/2016
	PT15856 SAP Business Warehouse	0	497	0	0	0	0	288	209	497	0	0	0	12/31/2015
	PT14925 Employee Care Services	0	0	1,754	0	0	0	0	0	0	754	1,000	1,754	12/31/2016
	PT15801 GIS SAP Integration	0	1,240	1,275	0	0	0	290	950	1,240	230	1,045	1,275	12/31/2016
	PT16802 Click v8 Functional En	0	0 0	3,384	0 5	0 5	0 0	0 0	0 0	0 0	2,784	009	3,384	12/31/2016
	PT81431 Click M&I M&R Stabiliz	826	0	0	213	613	826	0	0	0 (0	0	0	6/30/2014
	PT81412 GAS GIS Enhancements 2	1,154	0 0	0 0	122	1,032	1,154	0 0	0 0	0 0	0 0	0 0	0 0	3/31/2014
	P181428 SCG Mod Guix I Phase 2	934	o c	> C	197 256	13/	934	o c	o c	>	o c	> C	-	12/31/2014
	PT81353 ECM REPLACEMENT	567	0 0	0 0	104	463	567	0 0	0 0	0 0	0 0	0 0	0 0	2/28/2014
	PT81448 DESIGN ENGINEERING SW	819	158	0	6	810	819	, m	155	158	0	0	0	1/31/2015
		270	0	0	0	270	270	0	0	0	0	0	0	9/30/2014
	PT81436 SCG CI My Biz Account	1,958	0	0	121	1,837	1,958	0	0	0	0	0	0	12/31/2014
		0	2,012	0	0	0	0	157	1,855	2,012	0	0	0	12/31/2015
		0	0	1,615	0	0	0	0	0	0	28	1,557	1,615	12/31/2016
	PT15934 SoCalGas Customer Serv	421	193	544	7	414	421	3	190	193	6	535	544	12/31/2016
	PT81399 FINANCIAL ASSET MGMT (3,179	0	0	691	2,488	3,179	0	0	0	0	0	0	12/31/2014
	PT81461 Gas GIS Project 2014	200	233	0	400	100	200	133	100	233	0	0	0	3/31/2015
	PT15859 GIS Gas Enhancements 2	0	3,111	1,103	0	0	0	401	2,710	3,111	133	970	1,103	3/31/2016
		18,068	20,601	22,716	3,631	14,437	18,068	4,375	16,226	20,601	6,600	16,116	22,716	
00.227.00	PT14918 Small Cap Requests (Ba	C	132	C	C	C	O	C	132	132	C	C	C	6/30/2015
	PT15920 Small Cap Requests (Cu	0	10	10	0	0	0	0	10	10	0	10	10	6/30/2016
	PT81396 PACER MDT REPLACEMENT	2,675	0	0	297	2,378	2,675	0	0	0	0	0	0	6/30/2014
	PT81454 SCG Field MDT Upgrade	2,869	0	0	0	2,869	2,869	0	0	0	0	0	0	3/31/2014
		5,544	142	10	297	5,247	5,544	0	142	142	0	10	10	
00778.0	PT14832 SharePoint 2013	2,588	1,951	0	332	2,256	2,588	820	1,131	1,951	0	0	0	12/31/2015
		0	2,512	2,512	0	0	0	362	2,150	2,512	362	2,150	2,512	12/31/2016
	PT14833 Data Loss Prevention	2,184	0	0	284	1,900	2,184	0	0	0	0	0	0	12/31/2014
	PT14897 Travel and Expense Mob	0 (2,382	0	0 (0 (0 (232	2,150	2,382	0 (0 (0 (7/31/2015
	P115926 SAP Enterprise Mobilit P181407 E-BBOCHBEMENT IMBLEMEN	0 00	848	0 0	0 عرر	0 6	000	348	273	848	o c	0 0	o c	7/31/2015
	PIS1407 E-PROCOREIMEN I IIMPLEIMEN	999	1//	0 2.5	225	4//	988	399	372	1//		0 6	0 6	9/30/2015
		5,771	8,404	715'7	841	4,930	5,//1	2,161	6,303	8,464	397	2,150	2,512	
00780.0	PT14861 Identity & Access Mana	2,220	2,220	2,092	577	1,643	2,220	577	1,643	2,220	842	1,250	2,092	12/31/2016
		458	0	0	183	275	458	0	0	0	0	0	0	4/30/2014
	PT16888 Identity & Access Mana	0 [0 0	1,727	0 1	0 7	0 [0 0	0 0	0 0	167	1,560	1,727	12/31/2016
	PIS1451 Mandiant Expansion	453	ח לנג נ	0 010	/ 25	440	453	3	0 62,	ח לני	000	0 670	0.00	2/ 28/ 2014
		TCT'C	2,220	9,019	/0/	7,304	3,131	//6	1,043	7,220	1,009	7,610	3,619	
00782.0	PT15898 SE Application Platfor	0	609	984	0	0	0	334	275	609	334	650	984	12/31/2016

MDRCHA	MDR CHAPLER 11 Q.24.B. ALLACHMEN I													
Budget	Budget Code		Summary			2014			2015			2016		Completion
Code	Description	2014	2015	2016	Labor	Non-Labor	Total	Labor	Non-Labor	Total	Labor	Non-Labor	Total	Date
		0	609	984	0	0	0	334	275	609	334	650	984	
00784.0	PT14826 - Integrated Customer	1,435	3,080	326	241	1,194	1,435	572	2,508	3,080	7	319	326	3/31/2016
	PT81415 Credit & Collections O	291	0	0	274	17	291	0	0	0	0	0	0	9/30/2014
		1,726	3,080	326	515	1,211	1,726	572	2,508	3,080	7	319	326	
00786.0	PT14810 - Gas Distribution Ana	2,238	18	0	524	1,714	2,238	17	1	18	0	0	0	1/31/2015
	PT14862 Greenhouse Gas and Env	524	259	0	263	261	524	104	155	259	0	0	0	3/31/2015
		2,762	772	0	787	1,975	2,762	121	156	772	0	0	0	
00788.0	PT14805 - Enterprise BI Analyt	319	451	0	41	278	319	61	390	451	0	0	0	6/30/2015
	PT15806 Enterprise BI Analytic	0	0	769	0	0	0	0	0	0	97	672	692	12/31/2016
	PT15811 Enterprise Analytics S	0	0	452	0	0	0	0	0	0	52	400	452	12/31/2016
	PT16816 Enterprise Analytics S	0	0	470	0	0	0	0	0	0	70	400	470	12/31/2016
	PT16927 Enterprise BI Analytic	0	0	769	0	0	0	0	0	0	97	672	269	12/31/2016
		319	451	2,460	41	278	319	61	390	451	316	2,144	2,460	
00810.0	PTCPD SCG CPD Enh Phase 2	0	4,731	3,502	0	0	0	3,411	1,320	4,731	1,867	1,635	3,502	12/31/2016
	PT13810 SCG CPD Enh Phase 1	11,479	1,085	0	2,566	8,913	11,479	35	1,050	1,085	0	0	0	3/31/2015
		11,479	5,816	3,502	2,566	8,913	11,479	3,446	2,370	5,816	1,867	1,635	3,502	
		104.397	122.503	108.182	21.768	82.629	104.397	27.615	94.888	122.503	25.280	82.902	108.182	
			2006-1-		23 2/1-1	212/-2	120/: 22	i	224: 2	22/		100/10		

Appendix D

SoCalGas Response to Data Request ORA-SCG-DR-029-PM1, Question 5

ORA DATA REQUEST ORA-SCG-DR-029-PM1 SOCALGAS 2016 GRC – A.14-11-004 SOCALGAS PARTIAL RESPONSE DATE RECEIVED: DECEMBER 16, 2014

DATE RESPONDED: DECEMBER 12, 2014

5. Please provide the yearly capitalized hardware costs 2009-2013 and forecast from 2014-2016 (in nominal 2013 and base year dollars) delineated by the "Categories of Management" listed on Table CRO-13. Include an itemized list of the hardware replaced (2011-2013) and forecast to be replaced (2014-2016) with number of units, cost per unit, installation cost and any other cost associated with the hardware (if other costs are included explain why these costs were incurred).

SoCalGas Response 05:

A list of itemized hardware that is being replaced is not available. Individual hardware replacements are not currently tracked at the individual project level for GRC purposes. Historical cost for capitalized hardware cost from 2009-2013 by the categories of management is available in attachment ORA-SCG-029-PM1 Q5. The requested information for forecast costs (years 2014-2016) are also attached on ORA-SCG-029-PM1 Q5. Please note that the forecasted cost shown is cost related to proposed hardware project. All non-labor related cost is listed and can include non-labor cost associated with the hardware purchase.

ORA-SCG-DR-029-PM1 Question 5 Attachment (Historical)

SCG-029-PM1 Q5

Capital Hardware Purchases (2013 \$)									
	Fiscal year								
Categories of Management	2009	2010	2011	2012	2013				
CS - Field & SCG Mtr Reading	(159,901)	545,342	286,810	1,887,949	6,455,617				
CS - Information			27						
CS - Office Operations	30	14,773	20,167	1,966,099	437,097				
Engineering & ES					50,018				
Gas Operations		680,460	974,253	206,317	3,068,866				
Information Technology	6,456,450	(104,318)	6,726	75,730	5,588,265				
Supply Management	24,027	651	18,335	36,527					
So Cal Gas Total	6,320,606	1,136,908	1,306,319	4,172,621	15,599,863				

Capital Hardware Purchases (Nominal Base Dollars)									
	Fiscal year								
Categories of Management	2009	2010	2011	2012	2013				
CS - Field & SCG Mtr Reading	(130,191)	463,104	266,590	1,893,990	6,455,617				
CS - Information			25						
CS - Office Operations	24	12,545	18,745	1,972,390	437,097				
Engineering & ES					50,018				
Gas Operations		577,847	905,568	206,977	3,068,866				
Information Technology	5,256,841	(88,587)	6,252	75,972	5,588,265				
Supply Management	19,563	553	17,042	36,643					
So Cal Gas Total	5,146,237	965,462	1,214,223	4,185,973	15,599,863				

ORA-SCG-DR-029-PM1 Question 5 Attachment (Forecast)

SCG-029-PM1 Q5

	Fiscal year		
Categories of Management	2014	2015	2016
CS - Field & SCG Mtr Reading	2,792	200	6,685
CS - Office Operations	432	946	833
CS- Information	40	75	-
Engineering & ES	100	100	-
Environmental	-	-	-
Gas Distribution	3,993	819	130
Information Technology	24,688	28,104	40,999
Supply Management	949	200	-
So Cal Gas Total*	32,994	30,444	48,647

^{*}Cost are hardware related estimates. May include other associated non-labor cost related to hardware