

UWUA DATA REQUEST 4

- DR4-1.** Please List and describe in detail the elements and metrics that comprise "units of work" as used in the SoCalGas Direct Testimony of Frank Ayala (Gas Distribution) dated November 2014 (hereinafter "Ayala Testimony" or "FBA"), see e.g., at page FBA-viii, line 24.
- DR4-2.** Please list and describe in detail the elements and metrics that comprise "labor **expenses**" as used in the Ayala Testimony and Workpapers.
- DR4-3.** Please list and describe in detail the elements and metrics that comprise "non-labor expenses" as used in the Ayala Testimony.
- DR4-4.** Please describe in detail all factual and numerical data, metrics, and assumptions which SoCalGas used (uses) or made (makes) in determining any breakdown or allocation between labor and non-labor expenses, as those terms are used in the Ayala Testimony.
- DR4-5.** Does SoCalGas quantify labor expenses in terms of units of work or vice versa? Please provide the formula for converting one to the other.
- DR4-6.** Does SoCalGas quantify non-labor expenses in terms of units of work or vice versa? Please provide the formula for converting one to the other.
- DR4-7.** Does SoCalGas quantify labor expenses in terms of full-time equivalents (FTEs) or vice versa? Please provide the formula for converting one to the other, including factors related to non-work paid time, including vacation and sick pay, and expenses for employee fringe benefits.
- DR4-8.** Does SoCalGas quantify non-labor expenses in terms of full-time equivalents (FTEs) or vice versa? Please provide the formula for converting one to the other, including factors related to non-work paid time, including vacation and sick pay, and expenses for employee fringe benefits.
- DR4-9.** Please list and describe in detail the elements and metrics which are currently maintained for Base Year (2013) which are, or are of a type which will be, stored in the Gas Distribution data warehouse identified in the Ayala Testimony at FBA-66, lines 16-25, and which are in any way related to employee performance, employee productivity, non-labor performance and/or productivity, and safety.
- DR4-10.** Please identify each and every individual who performed calculations on source data related to and culminating in labor and non-labor expense figures

and projections in the Ayala Testimony and supporting Workpapers and, for each individual, describe the type of calculations he or she performed.

DR4-11. Document Production Requests

The term "document" refers to all written, graphic, and/or computerized material, including all "writings" as that term is defined in California Evidence Code Section 250, however produced or reproduced, of every kind and description, including but not limited to originals and copies of correspondence, papers, including working papers, books, pamphlets, contracts, memoranda, periodicals, accounts, letters, photographs, objects, microfilm, videotape, audio tape, notes, policies, diagrams, memorials of any type of conversations, meetings, or conferences, minutes, inter-office communications, e-mail, records, reports, studies, analyses, estimates, licenses, agreements, ledgers, accounts, purchase orders, data sheets, data processing tapes or disks, information maintained in computerized form, printouts, handwritten notes, or things similar to any of the foregoing.

1. With respect to Ayala Testimony at FBA-13,14, please provide documents identifying:
 - a. the approximately 160 cost centers;
 - b. the "workgroups" into which the cost centers were aggregated;
 - c. the similar functions or "cost drivers" used to determine aggregation of "workgroups;" and
 - d. the categorization of the workgroup into Field Operations and Maintenance, Asset Management, Operations Management and Training, and Regional Public Affairs
2. With respect to Ayala Testimony at FBA-14, lines 8-20, please provide any and all documents comprising the projections, analysis, review of the historical 2009 through 2013 spending; consideration of cost drivers; future expectations for cost drivers; forecast methodology; and analytical calculations.
3. Any and all documents comprising the "expanded Operator Qualification program" referred to in the Ayala Testimony at FBA-26 and described in FBA Section II.D., including but not limited to all factual or numerical data which form the foundation of the program and the foundation of any and all details of aspects of the program found in supplemental workpapers to the Ayala Testimony (e.g., SCG-FBA-O&M-SUP-006).
4. Any and all documents describing application of the "expanded Operator Qualification program" to contractors, including but not limited to: "providing consultation to" and "reviewing and auditing" contractor qualification programs

referred to at FBA-55, lines 24-25 and FBA-56, lines 23-24; evaluating and re-evaluating impacted employees of contractors

5. Any and all documents describing and/or analyzing the provision of consultation to, and/or the review and auditing of, Operator Qualification programs of contractors during Base Year (2013) and any and all documents measuring the operator qualifications of employees of contractors during Base Year (2013).

6. For any and all categories of costs in the Ayala Testimony or supporting workpapers which are broken down into, or which are allocated between, labor and non-labor expenses, any and all documents which show the elements and metrics which comprise each category of expense (labor and non-labor).

Note: For example, at FBA-29-30, the Ayala Testimony states that plans to work 193 incremental cathodic protection ("CP") packages in 2014, 387 CP packages in 2015, and 581 CP packages in 2016 will require a labor cost of \$104,000 and a non-labor cost of \$2,190,000 for TY 2016. This request, therefore, includes any and all documents which show the cost elements and measurements which comprise the \$104,000 figure and, separately, the \$2,190,000 figure, including documents which explain the charts on SCG-FBA-O&M-SUP-004, page 40 of 182.

7. For any and all categories of costs in the Ayala Testimony or supporting workpapers which are broken down into, or which are allocated between, labor and non-labor expenses, any and all documents which show the breakdown between labor and non-labor expenses expressed in measurements of labor "units of work" and non-labor "units of work" or in labor full-time equivalents (FTEs) or non-labor full-time equivalents (FTEs).

8. For any and all categories of costs in the Ayala Testimony or supporting workpapers which are broken down into, or which are allocated between, labor and non-labor expenses, any and all information (in computerized format in which they are maintained and used, e.g., Excel, Access, etc.) which:

(1) constitutes the source data from which the expenses set forth in the Ayala Testimony are derived (e.g., numbers of SoCalGas and contractor employees, numbers of hours worked, employee and contractor wage and benefit rates, contractor FTEs, etc.); and

(2) shows each and every calculation or manipulation of the source data performed, step by step, to reach the final listing of expenses set forth in the Ayala Testimony.