

**ORA DATA REQUEST
ORA-SCG-DR-020-TMR
SOCALGAS 2016 GRC – A.14-11-004
SOCALGAS RESPONSE
DATE RECEIVED: DECEMBER 4, 2014
DATE RESPONDED: DECEMBER 17, 2014**

Exhibit Reference: SCG-31

Subject: Cost Escalation

Please provide the following:

1. On page SRW-1 of Mr. Wilder's SoCalGas Cost Escalation testimony, Mr. Wilder reports that Union labor is weighted 51.04 percent. However, on page SRW-1 of Mr. Wilder's San Diego Gas & Electric Cost Escalation testimony, he notes that Union labor receives a 27.184 percent weighting. Please explain why SoCalGas' Union labor percentage is nearly twice as large as SDG&E's Union labor percentage.

SoCalGas Response:

As stated on pages SRW-1 and SRW-2 of Mr. Wilder's testimonies for SoCalGas and for SDG&E, "the weightings are based on recorded 2013 labor earnings for [employee categories]...". For SoCalGas, 2013 labor earnings for union labor were \$378,806,413 – or 51.401% of SoCalGas' total labor earnings of \$736,965,119 (from page 4 of Mr. Wilder's SoCalGas Cost Escalation workpapers). For SDG&E, 2013 labor earnings for union labor were \$156,055,625 – or 27.184% of SDG&E's total labor earnings of \$574,084,122 (from page 4 of Mr. Wilder's SDG&E Cost Escalation workpapers).

Union labor earnings are a relatively larger percentage for SoCalGas mainly because SoCalGas has a higher percentage of employees who are union members. Per Sempra Energy's Compensation and Benefits Department, corresponding headcounts for 2013 showed that 6,060 (65%) of SoCalGas' 9,257 employees were union members; SDG&E union members were 1,481 (27%) of its 5,412 employees.