

**ORA DATA REQUEST  
ORA-SCG-DR-070-TLG  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: FEBRUARY 23, 2015  
DATE RESPONDED: MARCH 2, 2015**

**Exhibit Reference:** SCG-11

**Subject:** Customer Service Office Operations

**Please provide the following:**

1. SCG forecasts \$104.108 million (\$98.076 million for Non-Shared, and \$6.032 million for Shared Services) for Test Year 2016 for its Customer Service Office Operations' Operations and Maintenance (O&M) expenses. The five year average (2009-2013) is \$103.916 million.
  - a. SCG states on page EDG-31 and EDG-32 that "In September of 2013, a branch office optimization application (A.13-09-010) was filed in which SoCalGas requested to close six under-utilized branch office locations. If the Commission approves the application's proposed office closures, in whole or in part, SoCalGas will file revised testimony for TY 2016 GRC request to reflect the impact of the approved branch closures on forecasted O&M and capital costs." Provide documentation that explains the status of SCG's proposed branch office closures and its associated "branch office optimization application (A.13-09-010)", and state if there has been any filed revisions to SCG's TY 2016 forecast.
  - b. On page EDG-22 SCG shows that its TY 2016 forecast for its Customer Contact Center (CCC) Operations includes funding of \$1.259 million (\$3.777 million over three years) for 19.9 additional Customer Service Representatives (CSRs) to perform activities associated with customer enrollment in California Alternate Rates for Energy (CARE) program. Currently SCG's customers are informed about the CARE program through SCG's interactive voice response system when the customer calls to request new service or payment arrangements and at that time if interested in CARE, the customer can speak to a CSR and request a CARE application (this is mandated by PUC code 739.4).

SCG states on page EDG-23 that D.14-06-036 ordered the following: "Utilities currently providing access to a live representative or agent for CARE enrollment by phone will continue to do so. All other utilities will seek funding through the Low Income Programs proceeding to implement in the next program cycle." SCG states further on page EDG-23 that "CARE postage, printing and inserting reduced costs are not accounted for in this GRC because they are covered by CARE program funding." SCG states on page EDG-22 that "If funding is approved as part of the Low Income Programs proceeding, update testimony will be filed to remove the funding request from this GRC application."

Provide documentation that explains in detail why SCG is requesting funding in two different proceedings for the same proposed activities/double recovery of proposed costs (i.e., requesting funding in 2016 GRC and Low Income Programs proceeding) when D.14-06-036 stated specifically that "Utilities currently providing access to a live

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Question 1 (Continued)

representative or agent for CARE enrollment by phone will continue to do so. All other utilities will seek funding through the Low Income Programs proceeding to implement in the next program cycle.”

- c. Regarding SCG’s Integrated Customer Data & Analytics project, SCG states on page EDG-63 that “The current system constrains SoCalGas’ ability to manage, sort and analyze customer data for business decision making. The current data warehouse is a collection of many sources, requiring business analysts to navigate multiple databases and spend excessive time manually integrating data to answer basic business questions...Due to the size of the data, the duplication of locations and the age of the data management and report generation technology, it can require several days or longer to run and compile large reports.”

Provide documentation that demonstrates all costs incurred by SCG’s business analysts (provide the number of FTEs performing the activity) during 2009-2013 “to navigate multiple databases and spend excessive time manually integrating data to answer basic business questions” and required “several days or longer to run and compile large reports.”

- d. Provide documentation that explains specifically and demonstrates where in SCG’s TY 2016 GRC, SCG shows the incorporation of the calculated savings from costs that were incurred during 2009-2013 from SCG’s business analysts that no longer will be required “to navigate multiple databases and spend excessive time manually integrating data to answer basic business questions” and no longer being required to “several days or longer to run and compile large reports.”
- e. SCE’s 2016 forecast includes incremental funding for additional FTEs, provide documentation that explains in detail why SCG is not able to reallocate embedded funding from eliminated projects, maintenance costs from eliminated projects/programs, costs incurred for eliminated procedures and processes, and overtime costs to fund proposed activities and additional FTEs in TY 2016.

**SoCalGas Response:**

- a. SoCalGas’ proposed branch office closures are pending in A.13-09-010. Pursuant to the Ruling of ALJ Halligan dated July 16, 2014 in A.13-09-010, SoCalGas submitted Opening and Reply Briefs in August 2014. SoCalGas is awaiting issuance of a proposed decision in A.13-09-010. There have been no filed revisions to SoCalGas’ TY2016 forecast in the Branch Offices.

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**SoCalGas Response (Continued):**

- b. SoCalGas clarifies that that the statement quoted from page EDG-23 is contained in the Settlement Agreement that was adopted by D.14-06-036.

SoCalGas is compliant with the Settlement Agreement provision to propose CSR funding for CARE enrollment in its Low Income Programs application (A.) 14-11-011

The Commission, in D.05-04-052, did not allow call center costs to be charged to the CARE Program. Although more recently, in D.12-08-044, the Commission authorized Southern California Edison to recover these costs through the Low Income Proceeding, the Commission has not yet authorized this treatment for SoCalGas. SoCalGas has thus made a concurrent request in its test year 2016 GRC in the event the Commission rejects the funding request in A.14-11-011. This ensures the proposal receives consideration and can be acted upon in the proceeding deemed prudent by the Commission.

SoCalGas also indicated the following in A.14-11-011, the testimony of SoCalGas witnesses Carmen Rudshagen and Hugh Yao:

SoCalGas has also requested concurrent funding for this effort as part of its Test Year 2016 General Rate Case (“GRC”) Application to be filed in November 2014. Should funding be approved as part of this Low-Income Application proceeding, SoCalGas will remove its funding request for this effort in the GRC.

SoCalGas is thus clear and explicit that it does not propose “double recovery” of the proposed costs.

- c. The Integrated Customer Data Analytics (ICDA) project is being implemented in order to improve the availability and accuracy of data used by SCG to make business decisions. The business case for the ICDA project did not include cost savings related to reducing costs or headcount of business analysts at the company. However SoCalGas anticipates that providing better access to data and better tools for analysis will create greater efficiencies for business analysts, thereby allowing analysts to conduct more timely and frequent analysis and focus on more complex analytical problems.

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**SoCalGas Response Question 1c (Continued):**

SoCalGas does not track business analyst work hours to the level of detail that would be required to provide specific costs associated with these activities. In the industry-standard CRISP-DM (Cross Industry Standard Process for Data Mining) methodology, IBM identifies the Data Preparation phase as accounting for up to 70% of the total time spent for almost every data analysis effort. Based on observations and internal interviews, this cross-industry norm holds true at SoCalGas. Similar to other companies in the U.S. and globally, SoCalGas is working to address these problems and manage our customer data in way that reduces the time required for data preparation.

The volume of data that SoCalGas is managing is increasing at a rapid rate, especially with the introduction of customer interval usage data provided by Advanced Meters. Since 2010, the volume of customer data that SoCalGas manages has more than doubled and is projected to triple again between now and 2019. It is critical that SoCalGas have the appropriate tools to manage that data to validate data quality, ensure customer privacy, and leverage data to gain business insights that will help us manage costs and enhance customer experience.

- d. SoCalGas does not anticipate reducing business analyst headcount. ICDA will enable business analysts to have access to more accurate and timely data, and to spend more time doing analysis and less time on data preparation activities.
- e. Even though this question refers to SCE, SoCalGas interprets this question to relate to the SoCalGas request and responds accordingly. SoCalGas believes the Base Year 2013 resources will not be sufficient for incremental requests in the TY2016 forecast. BY2013 numbers represent ongoing costs that are expected to reoccur in TY2016 and subsequent years. In the TY2016 forecast, SoCalGas has taken reductions totaling (\$4,967K) from 2013 base year adjusted recorded results for self-service adoption in CCC Operations (\$1,224K); the automation of Out Bound Dialing in CCC Support (\$245K); reduction of postage costs in Credit and Collections Postage that are associated with combining Late Payment Notices with customer bills (\$591K); and reductions in Remittance Processing (\$181K) and Remittance Processing Postage (\$2,726K) for savings associated with continued migration towards paperless billing. Additionally, the BY2013 adjusted recorded results and FTEs used as a starting point for TY2016 forecasts already reflect additional efficiencies that resulted in \$5,408K in avoided costs for rate payers (Please see Appendix A in Exhibit No SCG-11 for details.)

Incremental requests reflect additional forecasted activities in TY2016 that cannot be completed with existing resources. These incremental requests are outlined in the testimony and workpapers of witness Evan Goldman in Exhibit No: SCG-11 and SCG-11-WP.

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**SoCalGas Response Question 1c (Continued):**

The TY2016 forecast for the following areas of CSOO is at or below BY2013 adjusted recorded levels: Branch Offices, Remittance Processing, Remittance Processing Postage, USS cost centers 2200-0355 (Payment Processing), 2200-2240 (SR VP Customer Service Innovation and Strategy), and 2200-2247 (Manager of Remittance Processing).

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2. For SCG's Customer Service Office Operations, provide, when available, the recorded adjusted 2014 labor and non-labor expenses as of December 31, 2014 in the same manner as shown in workpapers on pages 158-159.

**SoCalGas Response:**

2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015.

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3. For SCG's Customer Service Office Operations, provide the recorded 2014 capital expenditures for all projects listed in Table 37 on page EDG-60.

**SoCalGas Response:**

2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015.

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4. Provide documentation that explains in detail if SoCalGas's Customer Service Office Operations deferred any required/mandated projects, programs or other activities during 2009-2013.

**SoCalGas Response:**

SoCalGas Customer Services Office Operations did not defer any required/mandated projects, programs or other activities during 2009-2013.

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5. If projects, programs or other activities were deferred during 2009-2013, identify the projects and associated costs and state the cause of the deferral.

**SoCalGas Response:**

Please see response to Question 4 above.

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6. Provide documentation that demonstrates the amount SCG's Customer Service Office Operations requested/forecast in its 2012 GRC and the amount it was authorized in its 2012 GRC (D.13-05-010). In the response provide the corresponding 2016 GRC account/Cost Center/Work Group. Provide the response in a spreadsheet similar to the one shown in workpapers on page 158-159.

**SoCalGas Response:**

Please see file attachment provided, "ORA-SCG-DR-070-TLG\_Q6 Attachment.pdf" which shows SoCalGas Customer Service Office Operations TY2012 GRC requested/forecast and authorized in D.13-05-010 by the corresponding TY2016 Customer Service Office Operations, Cost Center / Workgroup.

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7. Provide all supporting documentation and the basis used for the calculation of the labor and non-labor forecast for SCG's Customer Service Office Operations (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with a source document).

**SoCalGas Response:**

Attachment "ORA-SCG-DR-070-TLG Q7 Attachment 1.pdf" provides documentation and the basis used for the calculation of the labor and non-labor forecast for SoCalGas' Customer Service Office Operations, and corresponding cost driver, as described in Evan Goldman's direct testimony Exhibit SCG-11 and workpapers Exhibit SCG-11-WP.

There are also several additional **CONFIDENTIAL** supporting attachments that will be provided to ORA at a later date.

**DOCUMENTS REMOVED DUE TO CONFIDENTIALITY**

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**SoCalGas Response Question 7 (Continued):**

Please also see below for the represented workforce Pay Grades used to forecast incremental represented positions.

CSR-2:

**Grade 2**

6 months per step 2-year progression	Starting	First 6 Months	Second 6 Months	Third 6 Months	Standard 6 Months
Hourly Base Rate Eff. 1/1/12	\$25.00	\$26.26	\$26.75	\$27.24	\$27.79
Hourly Base Rate Eff. 1/1/13	\$25.68	\$26.98	\$27.49	\$27.99	\$28.55
Hourly Base Rate Eff. 1/1/14	\$26.33	\$27.66	\$28.18	\$28.69	\$29.27
Hourly Base Rate Eff. 1/1/15	\$26.99	\$28.35	\$28.88	\$29.40	\$30.00

Clerical -3:

**Grade 3**

6 months per step 2-year progression	Starting	First 6 Months	Second 6 Months	Third 6 Months	Standard 6 Months
Hourly Base Rate Eff. 1/1/12	\$26.80	\$28.13	\$28.67	\$29.23	\$29.81
Hourly Base Rate Eff. 1/1/13	\$27.54	\$28.90	\$29.46	\$30.03	\$30.64
Hourly Base Rate Eff. 1/1/14	\$28.23	\$29.63	\$30.20	\$30.78	\$31.40
Hourly Base Rate Eff. 1/1/15	\$28.94	\$30.37	\$30.96	\$31.55	\$32.19

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**SoCalGas Response Question 7 (Continued):**

CSR-4:

**Grade 4**

<b>6 months per step 2-year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. 1/1/12	\$28.60	\$30.02	\$30.63	\$31.21	\$31.82
Hourly Base Rate Eff. 1/1/13	\$29.39	\$30.85	\$31.47	\$32.07	\$32.69
Hourly Base Rate Eff. 1/1/14	\$30.12	\$31.62	\$32.26	\$32.87	\$33.51
Hourly Base Rate Eff. 1/1/15	\$30.88	\$32.41	\$33.06	\$33.69	\$34.35

Collections Clerk-5

**Grade 5**

<b>6 months per step 2-year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. 1/1/12	\$30.73	\$32.27	\$32.92	\$33.53	\$34.21
Hourly Base Rate Eff. 1/1/13	\$31.57	\$33.16	\$33.82	\$34.46	\$35.15
Hourly Base Rate Eff. 1/1/14	\$32.36	\$33.99	\$34.67	\$35.32	\$36.03
Hourly Base Rate Eff. 1/1/15	\$33.17	\$34.84	\$35.54	\$36.20	\$36.93

Collections Control Clerk-5  
 Collections Control Clerk-5-Bilingual

Lead Customer Billing Analyst-6

**Grade 6**

<b>6 months per step 2-year progression</b>	<b>Starting</b>	<b>First 6 Months</b>	<b>Second 6 Months</b>	<b>Third 6 Months</b>	<b>Standard 6 Months</b>
Hourly Base Rate Eff. 1/1/12	\$33.20	\$34.85	\$35.53	\$36.24	\$36.94
Hourly Base Rate Eff. 1/1/13	\$34.12	\$35.81	\$36.50	\$37.23	\$37.96
Hourly Base Rate Eff. 1/1/14	\$34.97	\$36.70	\$37.42	\$38.16	\$38.91
Hourly Base Rate Eff. 1/1/15	\$35.85	\$37.62	\$38.35	\$39.12	\$39.88

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8. Provide documentation that demonstrates all recorded costs incurred for overtime/double-time for 2009-2013 for SCG's Customer Service Office Operations. Provide the recorded overtime/double-time costs in a spreadsheet similar to the one shown in workpapers on page 158-159.

**SoCalGas Response:**

Please see the file attached in response to Question 15 for the detailed breakdown of overtime labor by workpaper group and shared service cost center within each of the labor cost categories.

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9. Provide documentation that explains and demonstrates the calculation of SCG employee retirement savings for each year (2009-2013) and the incorporation of the cost savings into its TY 2016 FTE forecast.

**SoCalGas Response:**

SoCalGas has not projected retirements nor included projected retirements in its cost forecasts. Base Year activities were used as a starting point for all forecasts in CSOO with incremental requests and reductions based on new activities and changes to existing activities.

For example, within the Customer Contact Center Operations workpaper group, FTE needs are dictated by the number of customer contacts (calls, email, etc.) requiring CSR assistance as well as call length (AHT), service level objectives (LOS) and CSR utilization factors (Occupancy).<sup>[1]</sup> When forecasting Labor needs for CCC Operations, SoCalGas makes use of workforce planning software that leverages the above inputs to calculate the number of FTEs required to support the projected level of work. Finally a “shrinkage” factor is applied to the FTE requirements to account for paid time that is not spent handling customer contacts (i.e., vacation, breaks, lunch, holidays, sick time, training, etc.).

To determine required incremental or reduced funding for labor, SoCalGas multiplied the total hours by the wage rate for the job classification of each represented employee and used the average MRR for annual salary levels of non-represented employees. See attachment ORA-SCG-DR-070-TLG Q7 Attachment.xls provided in response to question 7 for details on incremental Labor and Non-Labor requests. Therefore, retirement levels are not relevant to the forecasted CSR FTE requirements which are based on the volume of work (level of activity) and projected productivity metrics (AHT, Occupancy, shrinkage, etc.).

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<sup>[1]</sup> Agent occupancy – The percentage of time CSRs handle calls versus waiting for calls to arrive.

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10. Provide documentation demonstrating the actual final salaries for each retired employee that worked in SCG's Customer Service Office Operations for 2009-2013.

**SoCalGas Response:**

Please see attached file labeled "ORA-SCG-DR-070-TLG\_Q10 Attachment.pdf"

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11. Provide documentation that explains if SCG's newly hired/proposed FTEs will be paid a starting salary that is at the same salary level of its employees that have or will be retiring in TY 2016.

**SoCalGas Response:**

In utilizing the BY2013 adjusted recorded costs for the CSOO Labor forecast, SCG based its required funding on the continuation of activities represented in the base year and did not make assumptions for fluctuations in salaries of existing positions.

SoCalGas' Labor forecast for TY2016 includes both represented and non-represented positions. Newly hired represented employees start at the bottom of the pay scale for their job classification and progress to the top of the pay scale after two years in the position. (Per the union contract, pay is increased every six months during this time assuming satisfactory employee job performance, recognizing that new employees are typically less productive than experienced employees while they are climbing the learning curve.)

Non-represented positions are assigned a MRR pay band based on the specific position. The salary of a newly hired/proposed non-represented employee is generally within the same MRR as a retiring employee within the same position. The specific salary for a new non-represented employee is based on skillset and experience and may be higher, the same as or lower than a retiring employee. For MRR pay bands please see "ORA-SCG-DR-070-TLG Q7 Attachment 2.xls".

For a breakdown of the Labor Rates utilized in the forecast of incremental FTEs in the TY2016 GRC, please see "ORA-SCG-DR-070-TLG Q7 Attachment 1.xls".

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12. Provide documentation that explains in detail and demonstrates why SCG's current staffing levels are insufficient to perform the work activities proposed for Test Year 2016.

**SoCalGas Response:**

SoCalGas believes the Base Year 2013 resources will not be sufficient for incremental requests in the TY2016 forecast. BY2013 numbers represent ongoing costs that are expected to reoccur in TY2016 and subsequent years. In the TY2016 forecast, SoCalGas has taken reductions totaling (\$4,967K) from 2013 base year adjusted recorded results for self-service adoption in CCC Operations (\$1,224K); the automation of Out Bound Dialing in CCC Support (\$245K); reduction of postage costs in Credit and Collections Postage that are associated with combining Late Payment Notices with customer bills (\$591K); and reductions in Remittance Processing (\$181K) and Remittance Processing Postage (\$2,726K) for savings associated with continued migration towards paperless billing. Additionally, the BY2013 adjusted recorded results and FTEs used as a starting point for TY2016 forecasts already reflect additional efficiencies that resulted in \$5,408K in avoided costs for rate payers (Please see Appendix A in Exhibit No SCG-11 for details.) The CSOO 2016 GRC testimony and workpapers of SoCalGas witness Evan Goldman (SCG-11 and SCG-WP-11) describe both reductions (resulting in fewer required FTEs) and increases (resulting in additional required FTEs) to 2013 base year work in anticipation of changes to activities in TY2016. Detailed documentation and explanations justifying these changes are provided in the testimony and workpapers along with "ORA-SCG-DR-070-TLG Q7 Attachment 1.pdf". SoCalGas does not have additional documentation beyond that which has been provided.

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13. Provide SCG's Customer Service Office Operations end of the year headcount and FTE count for 2009-2014 and the associated labor cost. In the response also provide the job classification and the assigned Cost Center/Work Group.

**SoCalGas Response:**

Please see attachment "ORA-SCG-DR-070-TLG Q13 Attachment.pdf" for end of the year headcount by job classification, annual full time equivalent (FTE) count, and the associated labor cost for 2009-2013 by non-shared workgroup or shared service cost center. SoCalGas does not track FTEs by job classification therefore FTEs are reported in aggregate by workgroup or cost center.

Customer Service – Office Operations developed its GRC forecast based on "FTE" not "Headcount." "Headcount" does not equal "FTE." An FTE position is an indication of activity level and not a specific headcount in any given year. In some cases, headcount may be less than the FTE count. For example, the activity level driving the forecasted incremental FTE in an operational area may ultimately be performed using internal labor, outside contractors, overtime or a mix of each. In other cases, headcount may be more than the FTE count if the positions are filled with part-time employees.

SoCalGas does prepare a forecast of "Headcount" which is used for forecasting employee benefits only (Exhibit SCG-21). Headcount forecast encompasses all employees, including those whose work responsibilities are included in the GRC, as well as those whose duties are related to a refundable program or other functional area with costs approved through a non-GRC proceeding. Headcount is not used in the operating areas to forecast cost.

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14. Provide documentation that explains if SCG's TY 2016 Customer Service Office Operations GRC request includes projects that it also requested and received funding for in its 2012 GRC (D.13-05-010), if so, identify the projects and associated costs.

**SoCalGas Response:**

SoCalGas' TY 2016 Customer Services Office Operations GRC request does not include any O&M projects that were requested and funded in SoCalGas' 2012 GRC (D.13-05-010), however, continued funding is required to sustain activities that were requested and approved in the 2012 GRC. Descriptions of Costs and Underlying Activities can be found at the beginning of sections II.B. through II.K and III.B. through III.D. in testimony Exhibit No. SCG-11.

SoCalGas TY2016 CSOO GRC request also does not include any capital projects that were requested and funded in SoCalGas' 2012 GRC. In the TY 2012 GRC testimony of SDG&E Witness Katherine Cordova (Exhibit SDG&E-15), capital funding was requested for both SDG&E and SoCalGas for the My Account Mobile Services project (\$1,363,000 in 2013 to cover both SDG&E and SCG capital costs) because the My Account system was at the time a shared asset that supported both SDG&E and SoCalGas. It should be noted that SDG&E's TY 2012 GRC Decision (D.13-05-010) did not specifically approve or deny its IT capital projects. Rather, D.13-05-010 authorized a total number for all of SDG&E's IT capital project requests. The My Account Mobile Services project as described on page KHC-88 of witness Katherine Cordova's 2012 GRC testimony created an application that allowed customers to view their SoCalGas bill and real-time bill balance and pay their bill via their mobile device.

Capital funding is requested in the SoCalGas 2016 GRC for the My Account Mobile 1C, Project #81423. (\$1,273,000 for 2014, \$416,000 for 2015, and \$0 for 2016.) As further described in prepared direct testimony (SCG-EX-11, pages EDG-65 & 66), customer usage and demand for access to SoCalGas transactions via mobile has continued to grow with more than 21% of customers accessing My Account via mobile devices in 2013. In response to this increasing customer demand, SoCalGas has continued to expand the options available to customers via mobile and SMS (text). This multi-phase project, which will be completed in 2015, has added the ability for customers to receive SMS bill ready notifications and bill balances and also pay their bills by SMS. It has also expanded the capabilities of the Mobile site to include payment extension requests and password reset functionality. Moreover, as Mobile technologies evolve and become even more prevalent (penetration) with customers, SoCalGas anticipates that future GRCs will include capital requests funding for Mobile technologies enhancements, new applications and upgrades. The reality is that Mobile technologies are changing at a rapid pace with several competing operating systems (iOS, Android, Microsoft) and ever growing suite of applications. Mobile technologies are becoming the communications and transactions channel of choice.

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15. For SCG's Customer Service Office Operations for 2009-2013 provide, in a spreadsheet similar to the one shown in workpapers on pages 158-159, a detailed and itemized listing of all labor and non-labor expenses (note: do not lump expenses together in the response, separate and identify the expenses by the categories as requested below) incurred for 1) employee meals, 2) employee luncheons, 3) vendor payments for offsite meetings and events (provide copies of contracts for costs and services provided), 4) all entertainment expenses, 5) employee recognition activities, 6) sporting events, 7) bonuses/awards, 8) employee/company memberships and dues, 9) all contributions, 10) charitable events, 11) brand awareness and loyalty surveys/campaigns/events, 12) lobbying activities/educating regulators and 13) other employee reimbursable expenses.

**SoCalGas Response:**

The expenses shown in the attachment "ORA-SCG-DR-070-TLG-Q15Attachment.xlsx" reflect the dollars spent in 2009-2013 as charged by the operating areas. The data shows variation in categories used, which is dependent upon the people responsible for assigning costs. In other words, depending on the individual categorizing and entering the expense, the same type of expense may not be categorized consistently across the historical 2009-2013 time period. The totals or aggregate recorded expenses should be correct, but the individual line item expenses may be not categorized correctly. All recorded costs are included in the attachment. Not all categories requested by ORA are specifically or separately identifiable.

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16. For SCG’s Customer Service Office Operations, provide, in a spreadsheet similar to the one shown in workpapers on pages 158-159, a detailed and itemized listing of all costs incurred for one-time, unusual, or non-recurring costs for the years 2009 through 2013, including but not limited to studies, equipment demonstrations and testing, special projects and programs, surveys, training, contract expenses, product/project development, testing and/or implementation, etc.

**SoCalGas Response:**

SoCalGas Customer Services Office Operations adjusted recorded costs do not include any one-time, unusual, or non-recurring costs for the years 2009 through 2013. All costs embedded in SoCalGas’ adjusted recorded data for 2009-2013 are recurring annual costs. The following chart shows items from Exhibit No.: (SCG-11-WP). These are one-time costs that were adjusted out from 2009 through 2013 recorded data.

Work-paper	Cost Type	WorkPaper Page	Cost Adjustment	Nominal (\$000)				
				2009	2010	2011	2012	2013
200001 CCC Support	Non-Labor	32 of 305	Katz settlement	-533				
200001 CCC Support	Non-Labor	35 of 305	Legal Settlement			-100		
200003 Billing	Non-Labor	59 & 60 of 305	Unplanned Temp Agency Cost			-51	-142	
200003 Billing	Non-Labor	59 of 305	Advertising Cost for Bill Redesign			-5		

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17. SCG's Billing Services forecasts 7.242 million (\$21.726 million over three years) in TY 2016. SCG utilized a base year methodology to forecast TY 2016 expenses "because the base year reflects the full impact of reductions in labor costs resulting from technology and process improvements." SCG's expenses declined each year between 2009 and 2013 from \$8.182 million in 2009 to \$6.932 million in 2013.
- a. SCG is requesting incremental funding in TY 2016 "to reduce and maintain the size of the billing backlog volume at 2012 historical levels. The billing backlog represents the number of unworked billing exceptions outstanding at any given point in time." SCG states on page EDE-36 that "Although significant process improvements have reduced the number of required resources to maintain the billing exception backlog, it appears base year staffing levels are not sufficient to keep the exception backlog in line with the 2012 historical level." Provide documentation that explains if SCG's Billing Services experienced billing backlogs when it filed its 2008 and 2012 GRCs.
  - b. Provide documentation that explains if SCG requested funding in its 2008 and 2012 GRCs to address its Billing backlogs. If SCG did request such funding in its 2008 and 2012 GRCs, provide the amount authorized to address the billing backlogs.
  - c. SCG's Billing Services is responsible for calculating bills and maintaining accurate customer account information. SCG's billing exceptions are bills that fail validations and require further manual review and adjustment by its Mass Market Billing group. Based on SCG's testimony on page EDG-33, SCG has billing backlogs or unworked billing exceptions outstanding. Provide documentation that explains and demonstrates the amount of time customers have waited during 2009-2013 to receive accurate bills from SCG due to billing backlogs or unworked billing exceptions outstanding.
  - d. SCG is requesting incremental funding in TY 2016 to support proposed increases in Mass Marketing Billing exception work due to forecasted meter growth from 2013-2016. SCG utilized its base year average of exceptions per meter to estimate incremental work volume. SCG's TY 2016 forecast for additional FTEs is based on forecasted meter growth. Provide documentation that explains and demonstrates if SCG's testimony incorporates an automatic adjustment to SCG's Mass Marketing Billing forecast if the Commission does not adopt SCG's proposed meter growth forecast as described in testimony. If not, state.
  - e. SCG's recorded costs for its Billing Services declined each year between 2009-2013 from \$8.182 million in 2009 to \$6.932 million in 2013. Provide documentation that explains if in SCG's 2012 GRC, SCG based its Mass Marketing Billing exception work forecast on its forecasted meter growth.

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**Question 17 (Continued)**

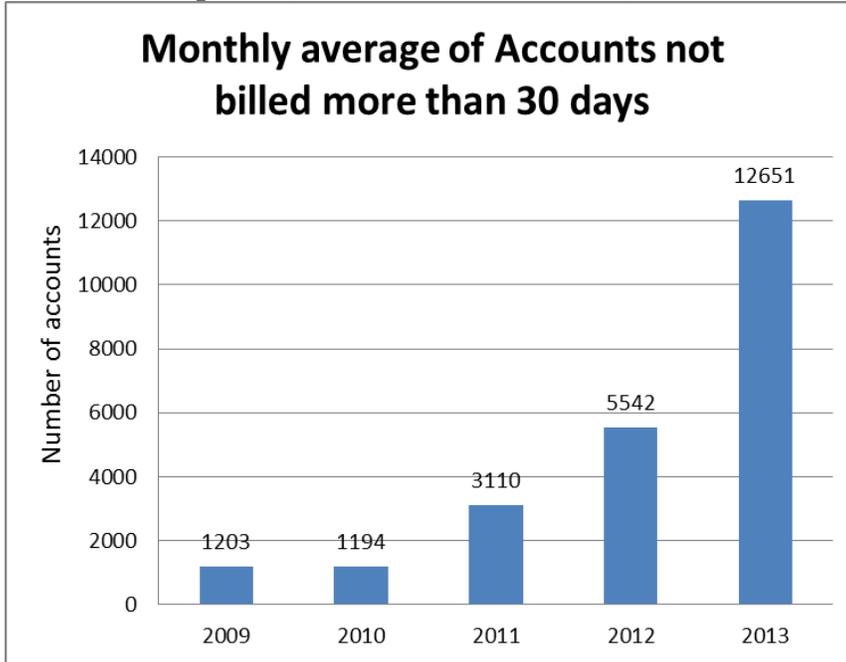
- f. Provide documentation that explains if SCG had meter growth each year between 2009-2013 that increased the related activities for its Mass Marketing Billing group.
- g. Provide documentation that demonstrates SCG's 2012 GRC forecast/authorized funding for its Mass Market Billing exception work and the 2012 forecast/authorized funding for its meter growth.

**SoCalGas Response:**

- a. Billing exceptions occur daily as a part of the normal activity in Mass Market Billing and there has always been some level of backlog. Mass Market Billing began monitoring the backlog queue as a Key Performance Indicator in 2008 and saw only minor fluctuations until 2012. Prior to 2012, the backlogs remained at a manageable level that did not necessitate a request for additional funding in either the 2008 GRC (before backlog exceptions became a KPI) or the 2012 GRC (when backlogs were consistently managed). Please see charts provided in response (c) below for the average backlog level from 2008-2013.
- b. SoCalGas did not request incremental funding to address the billing exception backlog in either the 2008 or 2012 GRC. Please see the response above to question 17.a. for an explanation of when "SoCalGas" recognized a need for additional funding to address growing billing exception backlogs.
- c. The Mass Market Billing group keeps track of how many active accounts have not been billed in a 30 day time frame. While more than 99% of all bills are received within 30 days, the monthly average number of customers who have waited more than 30 days to receive a bill has increased from 1203 in 2009 to 12,651 in 2013.

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**SoCalGas Response Question 17c (Continued):**



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**SoCalGas Response Question 17(Continued):**

- d. SoCalGas' TY2016 forecast for Mass Market Billing includes incremental requests for FTEs based on growth and a reduction of billing exception backlogs. Historically, The Rate Case Plan has not provided the opportunity for the utility to update its forecasted expenses, either up or down, in its application except for certain, specific and identified items in the update filing following hearings. SoCalGas has requested incremental changes based on meter growth in its most recent GRC applications (TY2008 and TY2012) and has not been asked to submit an updated forecast based on differences between forecasted and authorized levels of meter growth. Consistent with the applications for TY2008 and TY2012, SCG has not included any automatic adjustments to its request based on differences between requested and authorized meter growth.
- e. In the 2012 GRC the Billing forecast was based on a 5 year average (YA) of expenses from 2005 through 2009 with an incremental adjustment for forecasted customer and meter growth that would lead to increased billing activities that included processing exceptions. Additional adjustments were made for full year staffing levels and shifts in labor during 2005. Had SoCalGas chosen a 5YA for the TY2016 GRC request, the total request without any incremental funding would have been \$7,606,000, which is \$364,000 more than the BY2016 request in this proceeding.

Please see the following excerpt from the TY2012 GRC Exhibit No: SCG-08 on page MHB-12 for SoCalGas' meter growth forecast.

**Customer Growth**

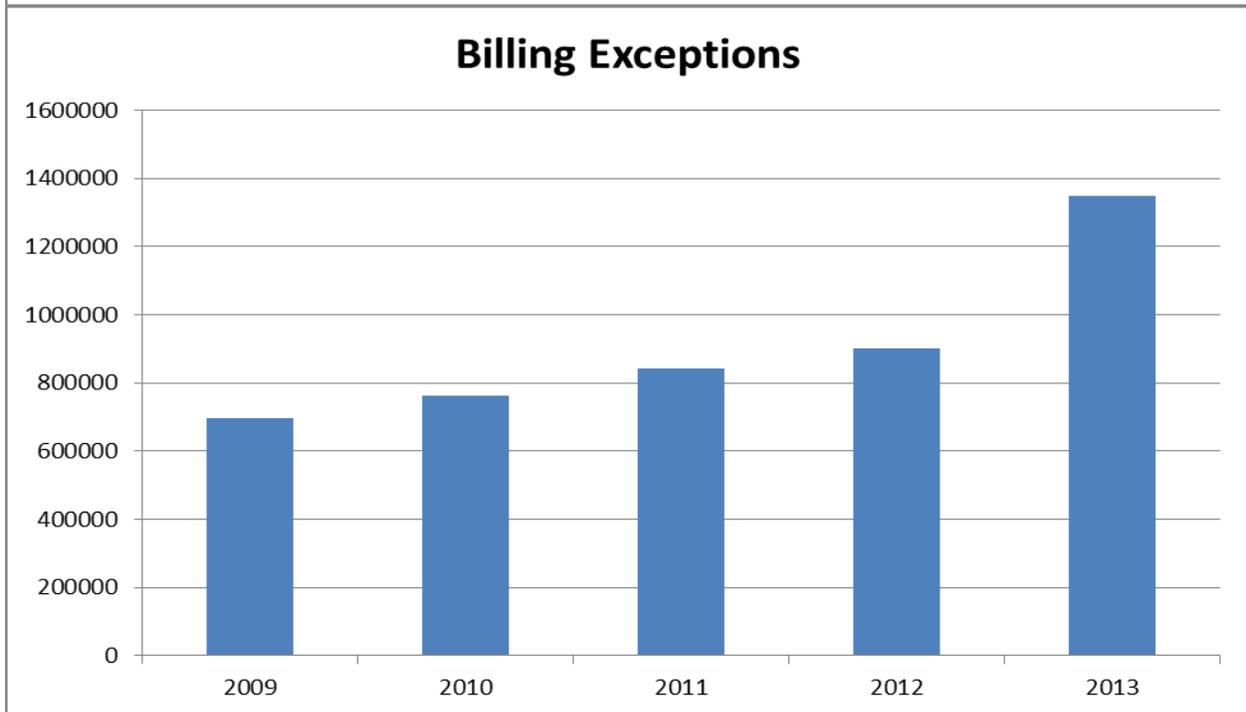
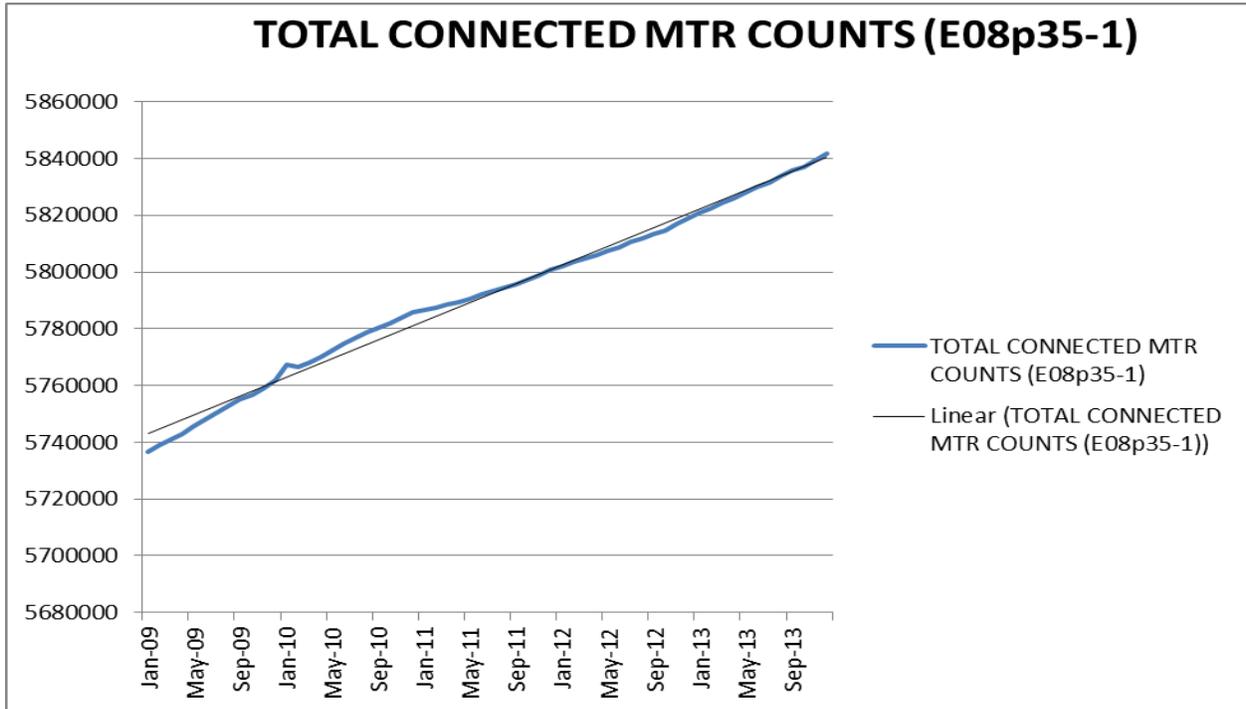
*In addition to a full year labor impact of \$35,000, SCG is asking for a labor increase of \$115,000 due to forecasted customer and meter growth over the period 2010 -2012 resulting in additional billing activities. These increased billing activities, such as processing billing exceptions, will require additional labor in order to process and resolve.*

- f. Meter counts and related activities increased every year between 2009 and 2013. See below for charts showing the increase in meter growth and billing exception activities for Mass Market Billing along with a chart demonstrating the increasing number of exceptions processed per hour by Mass Market Billing. Efficiency improvements in the bill correction and large meter malfunction investigation processes resulted in an increase in the average number of billing exceptions per hour handled by Mass Market Billing employees.

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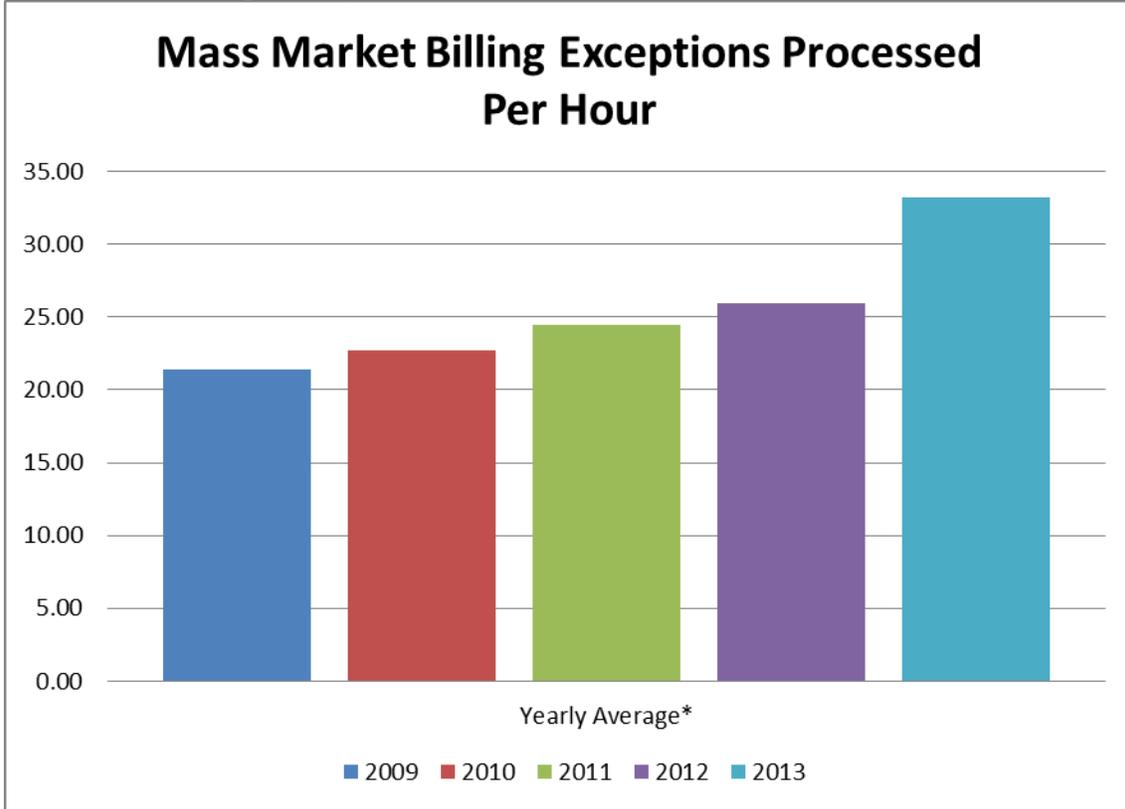
SoCalGas Response Question 17f (Continued)

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**SoCalGas Response Question 17f (Continued):**



- g. Billing exceptions work and maintaining accurate customer account records are the primary activities for Mass Market Billing and are embedded in the TY2012 GRC request. Please see the excerpts and documentation below for details on the requested and authorized funding for Billing in the TY2012 GRC. In the 2012 GRC, SoCalGas requested and was authorized an incremental \$115K (in 2009\$) and 1.8 FTEs to handle exceptions related to meter/customer growth.

See the response above to Question 17e for SoCalGas' requested funding for exception work related to meter growth.

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**SoCalGas Response Question 17g(Continued):**

Please see SoCalGas Decision Decision 13-05-010 May 9, 2013, A.10-12-005m ALJ/JSW/rs6/avs/jt2, page 503.

*No one has objected to SoCalGas' forecasts of the O&M costs for billing services and measurement data operations. Regarding the postage expense, SoCalGas reduced its postage O&M costs to \$20.629 million as a result of TURN's objection to prefunded postage. Based on the evidence and the arguments regarding SoCalGas' billing services, measurement data operations, and postage expense, we find SoCalGas' forecasts of these costs for test year 2012 to be reasonable, and the forecasts for these three business functions should be adopted.*

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18. SCG's Customer Contact Center Operations forecasts \$34.924 million (\$104.772 million over three years) in TY 2016. This is an increase of \$3.701 million or 11.85% over 2013 recorded adjusted expenses of \$31.223 million. SCG's expenses decreased by \$7.235 million between 2010 and 2013 from \$38.458 million in 2010 to \$31.223 million in 2013.
- a. Based on data provided in SCG's Table 10 on page EDG-17, SCG's Customer Service Representatives (CSR) Level of Service (LOS), the percentage of calls answered within 60 seconds, decreased from 78.4% in 2007 to 59.4% in 2013. SCG's Overall LOS decreased from 83.2% in 2007 to 71.1% in 2013. SCG's target for its Overall LOS in its 2012 GRC was 76%. Provide documentation that demonstrates SCG's 2012 GRC adopted CSR LOS and Overall LOS. Provide SCG's 2014 CSR LOS and its Overall LOS.
  - b. SCG's forecast includes incremental funding of \$1.579 million (\$4.737 million over three years) for 25 FTEs to increase its CSR LOS to 70%. Provide documentation that explains if SCG requested funding for FTEs in its 2008 and 2012 GRCs to increase its CSR LOS and its Overall LOS.
  - c. If SCG did request funding in its 2008 and 2012 GRCs, provide the number of FTEs requested and authorized to achieve its proposed levels of LOS and the amount requested and amount authorized to achieve the adopted CSR LOS and its Overall LOS.
  - d. SCG states on page EDG-16 that "Historically, SoCalGas has reported an overall LOS which included both IVR self-service calls as well as CSR calls answered within 60 seconds of being placed in the CSR call queue." SCG states further on page EDG-16 that "An increase in customer preference and adoption of self-service resulting from expanded options and enhanced usability contributes to reduced and avoided incremental CSR call volume." Provide documentation that demonstrates SCG's interactive voice response (IVR) self-service calls LOS for 2007-2014. Provide the response in the same manner as Table 10 on page EDG-17.
  - e. Provide tables that include updated 2014 data for Table 7 (Changes in CSR Answered Calls & Web/IVR Transactions) and Table 8 (Changes in CCC contacts and Transactions) on page EDG-14. In the response also include a column in the table for associated 2009-2014 recorded costs for Tables 7 and 8.
  - f. In regards to SCG's request for incremental funding of \$1.259 million for 19.9 FTEs/CSR to enroll customers in the CARE program, SCG states on page EDG-22 that "When speaking with a CSR, customers can request for a CARE application to be mailed. This is mandated in Public Utilities Code 739.4." Provide documentation that explains the job classification of the FTEs that handle the completed CARE applications and where specifically (i.e., the area within SCG that receives and processes the CARE applications) are the customers completed CARE applications mailed back to within SCG.

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- g. SCG states on page EDG-23 in regards to D.14-06-036 that “Utilities currently providing access to a live representative or agent for CARE enrollment by phone will continue to do so. All other utilities will seek funding through the Low Income Programs proceeding to implement in the next program cycle.” Provide documentation that explains the specific reference in D.14-06-036 that ordered SCG and other utilities to request funding for CARE enrollment in GRCs **and** request the same funding in the Low Income Programs proceeding.

**SoCalGas Response:**

- a. SoCalGas’ GRC forecast for CCC Operations in the 2012 GRC was adopted by the Commission and included assumptions of CSR LOS at 71% and Overall LOS at 76%. In 2014, the CSR LOS was 61.8% and overall was 75.1%.

See below for excerpt of SoCalGas Decision 13-05-010 May 9, 2013, A.10-12-005m ALJ/JSW/rs6/avs/jt2, page 502.

Decision:

*We reject TURN’s methodology and adopt SoCalGas’ methodology for developing the forecast of the call center costs.*

See SCG Decision 13-05-010 May 9, 2013, A.10-12-005m ALJ/JSW/rs6/avs/jt2, page 503.

*Based on the evidence presented, we find SoCalGas’ test year 2012 forecast of the O&M expenses for customer contact to be reasonable, as adjusted in the manner described above. The adjusted O&M funding amount is \$46.413 million. Pg 503*

Please note that the amount of \$46.413 million referenced in the decision is stated in 2009\$ and also the sum of authorized TY 2012 O&M funding for CCC Operations, CCC Support and CCC Shared Services. This number does not reflect \$5.6 million in reductions taken for efficiencies attributable to the OpEx program that was presented in the prepared direct testimony of witness Rick Phillips Ex. SCG-13. This is also different from the values shown in response to question 6 in this data request due to aligning the costs with the cost center organization structure in this case and escalation to 2013\$.

- b. No, SoCalGas did not request funding for FTEs in its 2008 and 2012 GRCs to increase its CSR LOS and Overall LOS. For 2012: see Exh No:SCG-07-WP/Witness: E. Fong - 2CC000.000\_Supp1.pdf, page 95.

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**SoCalGas Response Question 18b (Continued):**

**SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT**  
Workgroup 2CC000.000 Customer Contact Center Operations:  
CSR Forecast

	2010	2011	2012	Comments:
Annual Payroll Hours	2088	2080	2088	
Customer Service Representative (CSR) Calls Handled Forecast	7,851,895	7,916,459	7,995,026	based on forecasted active meter count
CSR Level of Service Used in Forecast	71%	71%	71%	2008 actual
Occupancy	84%	84%	84%	2008 occupancy achieved at SDG&E
Overall Average Handle Time (AHT)	231	231	231	2009 August year-to-date AHT
Base FTEs from "Eworkforce"	288.9	291.3	294.6	
Annual Absence Shrinkage Factor (less training %)	33.0%	33.0%	33.0%	Includes all paid absences (vacation, holiday, sick, jury duty and other non productive time such as bereavement and personal business), paid breaks and water breaks
Other Staff Shrinkage	3.8%	3.9%	3.8%	Read & review, training, other non-call, non-email CSR work such as high bill call backs
Total Shrinkage	37%	37%	37%	
FTEs Required for Shrinkage	169	170	172	
Total FTEs Required with Absence & Training Shrinkage	457.6	461.4	466.2	
Less Set Desk FTEs (Capital)	-14	-14	-14	Based on 2008 (less O&C portion of FTE; 18.1 Set Desk FTE less 4.6 O&M FTE = 13.5 Capital FTE)
E-mail FTEs	10	10	10	
CSR Less Set Desk + E-mail FTEs	454	457	462	
Overtime FTEs	13	13	13	Based on average of 2007, 2008 and year-to-date September 2009
Add New CSR Training	11	11	11	
CSR FTEs	477.9	481.7	486.3	25 CSR FTEs (High Bill Investigation & Multi-lingual representatives) included in this total are forecast in workgroup 2CC001.000 CCC Support where the applicable cost centers and historical expense reside

And Exh SCG-207 -E\_Fong\_Cust\_Serv\_Field\_Oper\_Rebuttal\_Testimony, pg 72.

**E. Customer Contact Center Level of Service ("LOS")**

UWUA proposes to increase the target CCC LOS to 90% of total calls within 60 seconds while allowing a 270 seconds CSR average handle time. UWUA has estimated that 120 additional CSRs would be required with associated incremental annual costs of \$8-11 million.<sup>83,84</sup> In contrast, SCG assumed a TY 2012 target LOS of 76% of total calls answered with 60 seconds and CSR average handle time of 231 seconds.

For 2008 CSR LOS, see SCG JPP-WP-120 December, 2006 DCN-EXH\_SCG-7\_JPP\_WP\_CO\_SCG

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Attachment JPP\_SCG\_NSS\_WPA\_903-1A.xls  
Customer Contact Center  
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**2008 SoCalGas Planned Offered Calls FTE Requirements**

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
CALLS	770,257	724,120	763,607	701,011	641,527	634,125	633,768	631,327	581,671	690,300	712,450	738,872	8,223,035
AHT	<i>Varies Weekly - See Below for day of Week Percentage</i>												
Absence	<i>Varies Weekly - See Below for day of Week Percentage</i>												
BREAKS	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33
Training & Development	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08	2.08
LOS	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9	74.9
OCCUPANCY	90.00	92.00	90.00	89.00	90.00	90.00	89.00	90.00	88.00	87.00	86.00	87.00	89.00
<b>MONTHLY:</b>													
BASE HOURS	54,484.54	50,505.87	54,919.15	51,041.37	46,533.63	45,972.78	45,944.62	46,052.75	43,213.20	51,471.80	53,299.95	55,290.36	598,730.02
BASE FTES	302.36	302.17	318.43	293.07	264.01	269.94	254.86	268.18	246.91	284.54	324.87	303.64	3,432.98
TOTAL HOURS*	87,093.08	82,362.55	86,511.60	82,248.93	77,596.56	72,869.58	76,104.09	73,360.40	71,160.13	81,246.70	91,927.14	87,916.51	970,397.27
TOTAL FTES*	483.50	492.34	503.34	471.53	440.90	428.64	423.52	427.30	404.31	448.49	561.84	482.66	5,568.37
TOTAL SHRINKG	37.44	38.68	36.52	37.94	40.03	36.91	39.63	37.22	39.27	36.65	42.02	37.11	38.30

\*INCLUDES BREAKS AND ABSENCE SHRINKAGE

Overall LOS, see SCG JPP-WP-120 December, 2006 DCN-EXH\_SCG-7\_JPP\_WP\_CO\_SCG, pg 120

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**Adjustments in CSR Labor Based on Changes in Forecasted Call Volumes**

	Calls	Hours
<b>2005-2006 Delta due to Call Volume Change</b>		
2005 hours used at 8,175,608 Calls (W/82.6/60 LOS)	8,175,608	934,079
2006 hours needed at 8,020,844 Calls (W/80/60 LOS)	8,020,844	918,547
Delta	(154,764)	(15,532) hrs
FTEs at 2080		(7.47) [A]
@ \$52.8K	52.8 \$	(394.27)
<b>2005-2006 Delta due to Call Volume Change</b>		
2006 hours needed at 8,020,844 Calls (W/80/60 LOS)	8,020,844	918,547
2006 hours needed at 8,020,844 Calls w/ incr. in off-production time [½ yr] (W/80/60 LOS)	8,020,844	932,400
2006 hours needed at 8,020,844 Calls w/ incr. in off-production time (W/80/60 LOS)	8,020,844	946,252
Delta Note: incr. in off-production time = 10 minutes per day	-	27,705 hrs [Full yr.]
FTEs at 2080		13,853 hrs [½ yr.]
@ \$52.8K	52.8 \$	13.32 6.66 [B]
	½ in 2006, ½ in 2007 \$	703 352
Net change in 2006 hours		(1,680) hrs
[A plus 1/2 of B = change in volume + incr. in off-production time 1/2 yr]		(0.81) FTE
	\$	(42.63)

TY	Forecasted CSR LOS	Forecasted Overall LOS
2008	74.9%	80.0%
2012	71.0%	76.0%

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- c. SoCalGas did not request funding for FTEs in its 2008 and 2012 GRCs to increase its CSR LOS and Overall LOS.
- d. 100% of IVR completed calls are answered within 60 seconds. Please see the chart below for details.

<b>Year</b>	<b>Overall LOS (a)</b>	<b>CSR LOS (b)</b>	<b>IVR LOS</b>	<b>IVR Incremental Contribution = (a) - (b)</b>
2007	83.2%	78.4%	100.0%	4.8%
2008	77.4%	72.8%	100.0%	4.6%
2009	76.0%	71.2%	100.0%	4.8%
2010	70.4%	63.8%	100.0%	6.6%
2011	77.4%	71.9%	100.0%	5.5%
2012	76.1%	68.8%	100.0%	7.3%
2013	71.1%	59.4%	100.0%	11.7%
2014	75.1%	61.8%	100.0%	13.3%
8 Year Average	75.8%	68.5%	100.0%	7.3%

- e. Please see the updated transactions requested in the charts below

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**SoCalGas Response Question 18e Continued:**  
 Table 7 – Changes in CSR Answered Calls & Web/IVR/Transactions

Year	CSR Calls	% of Total	IVR Calls	% of Total	Email	% of Total	Web & Mobile Self Service	% of Total	Total Contacts	Recorded Costs in 2013\$ (000)*
2009	7,215,157	79.9	1,548,149	17.1	168,152	1.9	102,123	1.1	9,033,581	\$ 36,313
2010	7,215,202	77.3	1,750,380	18.8	160,855	1.7	207,847	2.2	9,334,284	\$ 38,458
2011	7,023,482	72.5	1,773,093	18.3	191,486	2.0	705,854	7.3	9,693,915	\$ 35,434
2012	6,245,767	67.1	1,973,793	21.2	157,714	1.7	929,361	10.0	9,306,635	\$ 32,434
2013	6,312,561	62.0	2,693,197	26.5	156,070	1.5	1,012,625	10.0	10,174,453	\$ 31,223
2014	5,807,113	57.0	3,266,048	32.1	132,522	1.3	983,137	9.6	10,188,820	**
2015F	6,093,803	59.0	3,009,975	29.1	157,769	1.5	1,071,226	10.4	10,332,773	
2016F	6,370,219	59.4	3,030,523	28.3	158,959	1.5	1,167,208	10.9	10,726,909	
14 to '16 Growth	563,106		-235,525		26,437		184,071		538,089	

\*This is the total CCC Operations adjusted recorded costs. It does not include costs for web and mobile self-service, which are not in the CCC, or telecommunication and maintenance expenses that are in the CCC Support area.

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**SoCalGas Response Question 18e (Continued):**

\*\*2014 recorded costs will not be available until March 2015.

Table 8 - Changes in CCC Contacts and Transactions

Year	CSR Answered Calls (a)	Change from Previous Year (b)	Web and IVR Transactions (c)	Change from Previous Year (d)	Net Change = (b) + (d)	Recorded Costs in 2013\$ (000)*
2009	7,215,157		1,650,272		-	\$36,313
2010	7,215,202	45	1,958,227	307,955	308,000	\$38,458
2011	7,023,482	(191,720)	2,478,947	520,720	329,000	\$35,434
2012	6,245,767	(777,715)	2,903,154	424,207	(353,508)	\$32,434
2013	6,312,561	66,794	3,705,822	802,668	869,462	\$31,223
2014	5,807,113	(505,448)	4,249,185	543,363	37,915	**

\*This is the total CCC Operations adjusted recorded costs. It does not include costs for landline, landline and mobile self-service, which are not in the CCC, or telecommunication and maintenance expenses in the CCC Support area.

\*\*2014 recorded costs will not be available until March 2015.

f. CARE applications are mailed back to the CARE group in the SoCalGas Customer Programs and Assistance Department. Please note that the activities performed by the 3 job classifications listed below are outside of the scope of activities covered in the GRC and are represented in the Low Income Proceeding.

There are 3 job classifications that currently handle the completed CARE applications in the Customer Programs and Assistance Department:

- CARE Clerk 2 opens and distributes the mail for the group.
- CARE Processing Clerk 4 reviews and approves the CARE applications; contacts the customer if there are any questions; tracks CARE enrollment and operating statistics in support of operations, management, and regulatory reporting; and processes verification applications, including supplemental documentation review to validate selected customers' program eligibility.
- Lead CARE Control Clerk provides work direction and handles elevated customer calls.

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**SoCalGas Response Question 18e (Continued):**

See the following attached files for the specific job profiles for the positions listed above:

ORA-SCG-DR-070-TLG\_Q18 Attachment 1.pdf

ORA-SCG-DR-070-TLG\_Q18 Attachment 2.pdf

ORA-SCG-DR-070-TLG\_Q18 Attachment 3.pdf

- g. D.14-06-036 approved the Residential Disconnection Settlement Agreement submitted on April 1, 2014, by the Office of Ratepayer Advocates, The Utility Reform Network, The Greenlining Institute, Center for Accessible Technology, Pacific Gas and Electric Company, Southern California Edison, San Diego Gas & Electric Company, and Southern California Gas Company. Please refer to Section 4.3 of the Settlement Agreement which is incorporated as Attachment A to D.14-06-036. Please also see the response above for question 1.b. for an explanation of why SoCalGas filed a request for funding in both the Low Income Proceeding and the 2016 GRC.

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19. TY 2016 forecast for its Customer Contact Center Operations discussed on page EDG-19 include incremental funding of \$0.441 million for 7.1 FTEs to “support a projected net increase in AHT of 4.7 seconds.”
- a. Provide documentation that explains if during 2009-2013 SCG’s CSRs answered calls that contained a large proportion of complex call types as discussed on page EDG-19 which required longer Average Handle Time (AHT).
  - b. If SCG did not have CSRs answering calls that contained a large proportion of complex call types as discussed on page EDG-19 which required longer AHT, during 2009-2013, state the reason why not.
  - c. If SCG did have CSRs answer calls that contained a large proportion of complex call types as discussed on page EDG-19 which required longer AHT during 2009-2013, provide the number of FTEs involved in performing the work for each year associated with the large proportion of complex call types and also provide the recorded AHT.
  - d. SCG states on page EDG-19 that “As a continuous improvement activity, SoCalGas has completed Lean Six Sigma (“LSS”) projects to increase the call handling efficiency for several high volume call types. The results of these efforts have led to reductions in excess handle time on transactions.” SCG states further on page EDG-12 that “Base year 2013 customer contact volumes reflect customer adoption of self-service options resulting from SoCalGas’ capital investments and continuous improvement efforts for IVR, web and mobile options.” SCG’s recorded expenses have declined by \$7.236 million between 2010 and 2013.

Provide documentation that clearly explains why SCG’s Base year expense level of \$31.223 million is insufficient to address TY 2016 activities and state why SCG is not able to reallocate funds that used to be incurred for calls taken by CSRs since in the TY 2016 those calls will no longer be answered by CSRs and have been moved to customer self-service technology utilizing IVR and since SCG expects that more calls will be addressed by customer self-service options (“continuous improvement efforts”) in the TY.

- e. SCG’s recorded labor decreased by \$7.135 million or 18.77% between 2010 and 2013. SCG’s labor is forecasted to increase by 11.84% in TY 2016. In regards to SCG’s labor increase between 2009-2010, SCG states on page 263 of workpapers that “This Labor increase was primarily driven by an increase in AHT from 2009-2010. This increase in AHT was mostly attributed to a learning curve as CSRs adjusted to changes in the Phone and IVR system. The Labor increase was partially offset by a reduction in CSR LOS.” Provide documentation that explains SCG’s 18.77% decrease in recorded labor between 2010 and 2013 in more detail.

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**Question 19 (Continued)**

- f. SCG states on page EDG-19 that it “has completed Lean Six Sigma” projects and on page EDG-20 SCG shows in Table 12, Lean Six Sigma Impacts on AHT. Provide documentation that demonstrates the dates/time period and costs incurred for the Lean Six Sigma project. In the response also explain the meaning, basis, and the calculation breakdown of the costs shown in Table 12 under the “Value” column.
- g. Provide documentation that explains if SCG calculated its AHT in its 2016 GRC in the same manner as it did in its 2012 GRC.
- h. Provide 2014 data, when available, for SCG’s Table 12 on page EDG-20.

**SoCalGas Response:**

- a. As customers migrate to self-service channels for less complex requests such as Close Orders and Payment Arrangements, these simpler transactions with lower AHT make up a lower percentage of the CSR call mix and result in a larger percentage of existing call types with higher AHT. For example, whereas overall AHT was 255 in 2013, AHT for Close Order was only 191 and Payment Arrangement was 212. In 2013, Close Orders comprised 11% of CSR calls and Payment Arrangements 7%, but back in 2010 Close Orders comprised 12% of CSR calls and Payment Arrangements 15%. AHT is not increasing due to an increase in complex calls; the AHT is increasing because complex calls make up a greater percentage of the CSR’s call mix.
- b. Please see the response to 19.a. above.
- c. SoCalGas CSR workforce is mostly comprised of fully trained CSRs that handle all call types. We are not able to breakout the CSR FTE associated with handling only a subset of call types.

	2009	2010	2011	2012	2013
Overall AHT	241	260	255	251	255

- d. As part of the TY 2016 forecast for CCC Operations, SoCalGas included a reduction of \$1.224 Million and 19.5 FTEs to reflect adoption of self-service and reduced CSR answered call volumes. This reduction has been reallocated to CCC Operations and partially offsets a portion of the incremental TY2016 requested work. Without the reduction, 2016 CCC Operations request would be \$1.224 Million higher than was requested in the TY 2016 forecast. Incremental requests include FTEs for increased CSR Call volume related to meter growth and support of CSF’s initiatives; fluctuations in AHT that included CSRs signing up customers for CARE; improving CSR LOS; adjustments for full year staffing for positions that were not staffed the entire 12 months of 2013; non-labor dollars primarily consisting of office supplies, office furniture, headsets, and travel expenses for new FTEs; and supervisors

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**SoCalGas Response Question 19d (Continued):**

that enable span of control to remain at 15:1. Descriptions and calculations for these adjustments can be found in the testimony and workpapers of Evan Goldman (Exhibit No. SCG-11 and SCG-11-WP).

- e. Please see attached file labeled “ORA-SCG-DR-070-TLG-Q19e Attachment.pdf”
- f. The Payment Arrangement project commenced in 2011 and lasted approximately six months. The CSO and Start/Move project commenced in early Q2 2012 and lasted roughly five months. These efforts were primarily managed by a CCC employee supported by an additional SoCalGas employee from outside the CCC and no incremental costs were incurred. Following these projects, both of these employees moved on to lead and/or support other projects and initiatives.

	A	B	C	D <sup>(1)</sup>	E
			(A) X (B) / 3600 sec	(C) / (1- 37.4%)	(D) X \$30 per Hr
	Annual Vol (CIS)	AHT Change	Reduction in Hours (no shrinkage)	w/Shrinkage	Value from a cost avoidance of CSR labor dollars
PA	638,400	-41	(7,271)	(11,614)	\$ (349,325)
CSO	720,395	-9	(1,801)	(2,877)	\$ (86,309)
Start/Move	1,093,178	-10	(3,037)	(4,851)	\$ (145,524)
Total					\$ (581,158)

<sup>(1)</sup> Shrinkage accounts for time employees are on vacation, sick, break, etc.

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**SoCalGas Response Question 19 (Continued):**

- g. Yes, SoCalGas calculated its AHT in the same manner in 2016 GRC as in 2012 GRC. The actual YTD AHT was used as a starting point and adjustments were made for changes in the overall AHT as a result of additional talk time for new programs. See Exh No:SoCalGas-07-WP/Witness: E. Fong - 2CC000.000\_Supp1.pdf, pg. 102 of 288 for calculation AHT in GRC 2012.

**SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT**  
Workgroup 2CC000.000 Customer Contact Center Operations:  
CSR Forecast

	2010	2011	2012	Comments:
Annual Payroll Hours	2068	2060	2068	
Customer Service Representative (CSR) Calls Handled Forecast	7,851,893	7,916,459	7,995,026	based on forecasted active meter count
CSR Level of Service Used in Forecast	71%	71%	71%	2008 target
Occupancy	84%	84%	84%	SCG historical planning assumption
<b>Overall Average Handle Time (AHT)</b>	<b>231</b>	<b>231</b>	<b>231</b>	<b>2009 August year-to-date AHT</b>
Base FTEs from "Eworkforce"	288.9	291.3	294.6	
Annual Absence Shrinkage Factor (less training %)	33.0%	33.0%	33.0%	Includes all paid absences (vacation, holiday, sick, jury duty and other non-productive time such as bereavement and personal business), paid breaks and water breaks
Other Staff Shrinkage	3.8%	3.9%	3.8%	Read & review, training, other non-call, non-email CSR work such as high bill call backs
Total Shrinkage	37%	37%	37%	
FTEs Required for Shrinkage	169	170	172	
Total FTEs Required with Absence & Training Shrinkage	457.6	461.4	466.2	
Less Set Desk FTEs (Capital)	-14	-14	-14	Based on 2008 (less O&C portion of FTE; 18.1 Set Desk FTE less 4.6 O&M FTE = 13.5 Capital FTE)
E-mail FTEs	10	10	10	
CSR Less Set Desk + E-mail FTEs	454	457	462	
Overtime FTEs	13	13	13	Based on average of 2007, 2008 and year-to-date September 2009
Add New CSR Training	11	11	11	
CSR FTEs	477.9	481.7	486.5	CSR FTEs (High Bill Investigation & Multi-lingual representatives) included in this total are forecast in workgroup 2CC001.000 CCC Support where the applicable cost centers and historical expense reside

- h. SoCalGas cannot provide an update to Table 12 with 2014 results. The LSS results in Table 12 were measured by determining AHT both before and after the LSS process improvements were implemented. The majority of these process improvements are still in place, so the value associated with the efficiencies was sustained in 2014. It should be noted that other factors have impacted AHT on call volumes. For example, the final OIR D.10-12-051 has changed the payment arrangement process, which has increased AHT for payment arrangement calls.

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20. TY 2016 forecast for its Customer Contact Center Operations discussed on page EDG-28 and EDG-29 include incremental funding of \$0.296 million for 4 FTEs to “improve CSR Quality Assurance (“QA”) call monitoring”.
- a. Provide documentation that explains if during SCG’s 2008 and 2012 GRCs, SCG’s management was aware that “its QA team monitors 0.25% of the total volume of incoming CSR handled calls or approximately 15,000 calls per year” and that “This equates to QA reviews of approximately 27 calls per year, per CSR.”
  - b. If SCG’s management was not aware during its 2008 and 2012 GRCs that “its QA team monitors 0.25% of the total volume of incoming CSR handled calls or approximately 15,000 calls per year” and that “This equates to QA reviews of approximately 27 calls per year, per CSR”, provide documentation that explains when SCG’s management became aware of the issue.
  - c. SCG states on page EDG-26 that “Contact center industry guidance suggests the ideal volume of QA monitored calls is 0.75% -1% of total CSR calls.” Provide documentation that explains if during SCG’s 2008 and 2012 GRCs, SCG’s management was aware that “Contact center industry guidance suggests the ideal volume of QA monitored calls is 0.75% -1% of total CSR calls.”
  - d. If SCG’s management was not aware during its 2008 and 2012 GRCs that “Contact center industry guidance suggests the ideal volume of QA monitored calls is 0.75% -1% of total CSR calls”, provide documentation that explains when SCG’s management became aware of the Contact center industry guidance.
  - e. Provide documentation that explains why SCG’s management is waiting until its TY 2016 to implement improvements in its QA process.

**SoCalGas Response:**

- a. SoCalGas was aware of the level of calls evaluated between the years 2008-2012. However, as a result of an Accenture review of SoCalGas’ QA process completed in early 2013, SoCalGas was made aware that the call center industry standard practice for QA is to review 1% of the total call volume. SoCalGas employed Accenture to review its QA process to ensure processes, technologies, and staffing levels were consistent with industry best practices. The scope of this Accenture effort also included review of the CCC’s CSR training and agent desktop.
- b. Please see the response to Question 20.a. above.
- c. Please see the response to Question 20.a. above.
- d. Please see the response to Question 20.a. above.

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**SoCalGas Response Question 20 (Continued):**

- e. SoCalGas is not waiting until TY2016 to begin implementing improvements in the QA process. In Q4 of 2014, SoCalGas completed a Lean Six Sigma effort designed to thoroughly evaluate the QA process and identify specific actions to achieve the recommendations from the Accenture review.

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21. TY 2016 forecast for its Customer Contact Center Operations discussed on page EDG-16 include incremental funding of \$0.498 million for 7.9 FTEs to support an increase in calls resulting from SCG's forecasted meter growth from 2013-2016. SCG states that "A projection of 1.13 CSR handled calls per meter was used to project call volume growth."
- a. Provide documentation that explains if SCG utilized this same method in its 2012 GRC to project its call volume growth based on forecasted meter growth for its Customer Contact Center Operations expenses.
  - b. Provide documentation that explains the impact on SCG's incremental forecast of \$0.498 million that is based on forecasted meter growth if the Commission does not adopt SCG's meter growth as proposed in its 2016 GRC.
  - c. Provide documentation that demonstrates SCG's 2012 GRC requested and authorized meter growth rate and associated costs.
  - d. Provide documentation that demonstrates SCG's 2012 GRC requested and authorized CSRs and related call volume growth based on forecasted meter growth.

**SoCalGas Response:**

- a. SoCalGas used the same method to calculate call volume growth for both the TY2012 GRC and the TY2016 GRC. In both proceedings, SoCalGas multiplied the CSR answered calls per meter by the forecasted increase in meter count to determine the expenses required. For the TY 2012 GRC, SoCalGas based its forecast of CSR Call Volume on a 5YA of CSR Calls per meter (1.42). In the TY2016 GRC, "SoCalGas" used the BY2013 figure for CSR calls per meter (1.13) to determine growth. Had SCG used the 5YA of CSR calls per meter (1.23) for the Call volume forecast as the multiplier for growth in TY2016, the forecasted CSR Call volume would have increased by 574,385 calls above our current TY2016 request. Assuming all other CCC Operations variables remained the same, the CCC Operations Labor forecast would be \$2,445,683 higher than the current request. For documentation of how SCG forecasted calls related to meter growth in the TY2012 GRC, please see Exh No: SCG-07-Testimony/Witness E. Fong page 30.
- b. The Rate Case Plan does not provide for the utility to update its forecasted expenses, either up or down, in its application except for certain, specific and identified items in the update filing following hearings. As the utility is not entitled to revise its forecast up as circumstances may warrant, neither is the utility required to revise forecasts downward. Should a party choose to recommend a different funding level for a particular activity it is up to the party to derive a new forecast or other calculations to support that assertion.

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**SoCalGas Response Question 21 (Continued):**

- c. SoCalGas' TY2012 GRC requested meter growth can be found in Exhibit No.: SCG-30-Testimony/Witness S.Wilder on page SRW-2. And associated costs for CCC Operations related to meter growth are addressed in 21.d below.

<b>TABLE SCG-SRW-1</b>		
<b>SoCalGas Average Annual Total Active Meters</b>		
<u>Year</u>	<u>Active Meters</u>	<u>Annual % change</u>
2005	5,328,430	1.18%
2006	5,391,974	1.19%
2007	5,445,791	1.00%
2008	5,466,979	0.39%
2009	5,480,314	0.24%
2010	5,520,424	0.73%
2011	5,565,817	0.82%
2012	5,621,055	0.99%

SoCalGas' 2012 adopted meter forecast can be found in Hearing Exhibit 251 for the TY2012 GRC Request on page 973.

customer forecast that is less than SoCalGas using the updated data. DRA also 969  
compared its modeling results to the historical data, which reflect that historical data. Based on those various considerations, it is reasonable under the circumstances to adopt DRA's customer forecasts as it better reflects the economic conditions that have occurred during the timeframe of this proceeding. Accordingly, we adopt DRA's total active customer forecast of 5,520,424 for 2010, 5,536,450 for 2011, and 5,584,627 for 2012.

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**SoCalGas Response Question 21 (Continued):**

d In SoCalGas' 2012 GRC, \$853,000 was requested and authorized for meter growth rate.

See Exh No: SCG-07-Testimony/Witness E.Fong page 32, and SCG Decision Decision 13-05-010 May 9, 2013, A.10-12-005m ALJ/JSW/rs6/avs/jt2, page 502.

Testimony:

*The respective increases for TY 2012 estimated expenses for the 5-year average method and customer growth are approximately \$2,484,000 and \$853,000, respectively.*

Decision:

*We reject TURN's methodology and adopt SoCalGas' methodology for developing the forecast of the call center costs.*

In SoCalGas' 2012 GRC, 13 CSR FTEs were requested and authorized for call volume growth based on forecasted meter growth.

See Exh No: SCG-07-Testimony/Witness E.Fong page 32, and Decision 13-05-010 May 9, 2013, A.10-12-005m ALJ/JSW/rs6/avs/jt2, page 502.

Testimony:

*TY 2012 increased call volumes over the 2009 levels results from using the five-year average CSR calls per meter methodology. Specifically, the five-year average of CSR handled calls results in an increase of approximately 39 CSR FTEs to handle an additional 580,000 calls and an additional 13 FTEs for customer growth to handle an additional 200,000 calls by TY 2012.*

Decision:

*We reject TURN's methodology and adopt SoCalGas' methodology for developing the forecast of the call center costs.*

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22. Customer Service Other Office Operations and Technology forecasts \$4.501 million (\$13.503 million over three years) in TY 2016. This is an increase of \$1.171 million or 35.15% over 2013 recorded adjusted expenses of \$3.330 million. The five year average (2009-2013) is \$2.949 million. SCG's recorded expenses fluctuated and the highest recorded expense level was in 2012. SCG utilized a base year forecasting methodology.
- a. SCG's forecast includes incremental funding for a summer internship program. SCG states on page EDG-48 that "This program leverages college students to work on projects in a variety of departments within CSOO." Provide documentation that explains if during 2009-2013 SCG incurred costs for summer internship programs, if so, provide all costs incurred for 2009-2012.
  - b. Provide documentation that explains why SCG is unable to reallocate costs embedded in its historical expenses from the same or similar on-going projects, overtime costs, or from completed and/or eliminate projects and processes in order to fund its summer internship program in TY 2016.
  - c. SCG's forecast includes incremental funding of \$0.507 million (\$1.521 million over three years) for 4 FTEs to "develop and manage a Customer Data Privacy Program. Provide documentation that explains if SCG requested or was authorized funding for FTEs in its 2012 GRC (D.13-05-010), in D.12-08-045, or in D.11-07-056 to develop and manage a Customer Data Privacy Program.
  - d. If SCG did not request/receive authorized funding for FTEs in its 2012 GRC (D.13-05-010), D.12-08-045 or D.11-07-056 to develop and manage a Customer Data Privacy Program, state why not.
  - e. SCG states on page EDG-49 that "SoCalGas Privacy Policies require customer information to be safeguarded and classified as confidential, and Regulatory mandates and laws also govern the protection of customer data." Provide documentation that explains if during SCG's 2008 and 2012 GRCs it had Privacy Policies established that required customer information to be safeguarded and classified as confidential, and that there were Regulatory mandates and laws that governed the protection of customer data, if not, state why.
  - f. Provide all costs incurred during 2009-2013 for activities associated with handling customer information to ensure that it was safeguarded and classified as confidential and costs incurred with complying with all Regulatory mandates and laws that govern the protection of customer data.
  - g. If SCG was not following its implemented Privacy Policies that required customer information to be safeguarded and classified as confidential, and if it was not following Regulatory mandates and laws that governed the protection of customer data during 2009-2013, state why not.

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**Question 22 (Continued)**

- h. SCG states on page EDG-49 that its Chief Customer Privacy Officer is accountable for customer privacy across its organization and that its Customer Operations Director is also assigned responsibility and oversight for the implementation of SCG’s privacy policy. Provide documentation that identifies the responsible positions that were assigned the same or similar duties related to its customer privacy policies during 2009-2013 and include all associated costs that were incurred to support customer privacy policy activities.

**SoCalGas Response:**

- a. The chart below shows incurred costs within CSOO for summer internship programs. Beginning in 2014, all costs for CSOO interns are represented in workpaper group 200006-Other Office Operations and Technology. 2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015.

Workpaper Group	Fiscal Year				
	2009	2010	2011	2012	2013
200001-CCC Support	\$0	\$0	\$0	\$19,419	\$2,237
200003-Billing	\$0	\$0	\$17,266	\$0	\$0
200004-Credit and Collections	\$0	\$0	\$12,324	\$1,192	\$0
200006-Other Office Ops and Tech	\$0	\$0	\$0	\$0	\$0
<b>CSOO Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$29,590</b>	<b>\$20,611</b>	<b>\$2,237</b>

- b. Costs for incremental CSOO forecasted activities cannot be completed with BY2013 resources. BY2013 numbers represent ongoing costs that are expected to reoccur in TY2016 and subsequent years. In the TY2016 forecast, SoCalGas has taken reductions totaling (\$4,967K) from 2013 base year adjusted recorded results for self-service adoption in CCC Operations (\$1,224K); the automation of Out Bound Dialing in CCC Support (\$245K); reduction of postage costs in Credit and Collections Postage that are associated with combining Late Payment Notices with customer bills (\$591K); and reductions in Remittance Processing (\$181K) and Remittance Processing Postage (\$2,726K) for savings associated with continued migration towards paperless billing. Additionally, the BY2013 adjusted recorded results and FTEs used as a starting point for TY2016 forecasts already reflect additional efficiencies that resulted in \$5,408K in avoided costs for rate payers (Please see Appendix A in Exhibit No SCG-11 for details.)

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**SoCalGas Response Question 22b (Continued):**

Interns complete valuable analytical work within CSOO. In 2014, interns completed work related to credit and collections optimization, contact center efficiency and customer experience. If SoCalGas were to forecast these activities using full time analysts instead of interns, the cost of the forecasted activities would be higher due to the wage differential between interns and analysts. The use of interns is consistent with ORA's recommendation (A.10-12-005/006 DRA-48. Page 5; Lines 17-19) in the TY2012 GRC.

- c. SoCalGas did not request/receive authorized funding for FTEs in its 2012 GRC or any of the other proceedings referenced in the question to develop and manage a Customer Data Privacy Program.
- d. As described on pages EDG-49 through EDG-51 of witness Evan Goldman's direct testimony, SoCalGas is requesting in its TY 2016 GRC four full-time positions and 1/3 of the customer privacy independent audit costs that were mandated by CPUC D.12-08-045 or D.11-07-056. SoCalGas is authorized to request recovery for these incremental costs via an application or in a general rate case proceeding. CPUC D. 12-08-045 was issued August 31, 2012 and D.11-07-056 was issued July 29, 2011. Since the decisions were issued between rate cases, the first opportunity to recover incremental costs for SCG is the TY 2016 GRC.
- e. SoCalGas added a Customer Privacy Working Group in late 2012 after the Smart Grid Privacy Decision (D.11-07-056.) This was the first effort to centralize Customer Privacy activities because until this decision, each Business Unit was responsible for the Customer Privacy activities of their work group. During the 2009-2013 timeframe, SoCalGas had a Privacy Policy posted on its website and Information Security was involved in projects and performed data sharing risk assessments. Controls to safeguard customer information were driven by recommendations from Information Security. Audit Services performed independent reviews of these controls during this timeframe. Additionally, the Business Units had operating procedures to ensure customers were properly authenticated prior to making any account changes or establishing service. The Business Units also supported regular reviews to ensure electronic data exchanges were in compliance with National Automated Clearing House Association ("NACHA") rules and that financial information was maintained in compliance with the Fair and Accurate Credit Transactions Act ("FACTA") rules.

At the beginning of 2014, the SoCalGas Customer Privacy Program was established with the hiring of a Program Manager. The responsibilities of the SoCalGas Customer Privacy Program include:

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**Response to SoCalGas Question 22e (Continued)**

- Developing a Compliance Program for adhering to the orders as described in D.12-08-045 and Tariff Rule 42.
  - Developing standards and keeping SoCalGas policies current for the Customer Privacy Program and the Energy Data Request Program.
  - Administering the Generally Acceptable Privacy Principle (GAPP) Framework that SoCalGas has adopted for customer privacy controls.
  - Developing, implementing and administering a process and associated software application for managing third party data requests.
  - Administer and assess Privacy Impact Assessments (PIAs). Enhance and improve SoCalGas' use and implementation of the PIA.
  - Publishing updates to the mandated Privacy Notice on the SoCalGas website.
  - Responding to customer inquiries regarding the SoCalGas Customer Privacy Program and/or Notice.
  - Maintaining internal Customer Privacy website to deliver training, forms and new information to employees.
  - Preparing and delivering the CPUC mandated Annual Privacy Report.
  - Selecting and managing an external Audit Firm to perform the CPUC mandated independent assessment of privacy/security controls of Customer Energy Usage Data. This includes managing the information request/fulfillment process and the final report.
  - Partnering with Information Security and/or Corporate Security to investigate, report and remediate incidents that could involve breach or loss of customer data.
  - Consulting with Business Units on Customer Privacy related issues and reviewing/assessing projects for compliance with Tariff Rule 42 and SoCalGas privacy policies.
  - Developing customer privacy related materials and administering training for SoCalGas employees.
- f. Prior to 2014, costs incurred for activities associated with handling customer information to ensure that it was safeguarded and classified as confidential and costs incurred for complying with all Regulatory mandates and laws that govern the protection of customer data were not tracked separately. The Customer Privacy Program was launched in 2014 and activity costs will be reportable with these recorded costs.
- g. SoCalGas takes safeguarding Customer Information very seriously. At no time was SoCalGas not following Customer Privacy Policies and/or mandates and laws that govern the protection of data during 2009-2013. Prior to establishing the SoCal Gas Customer Privacy Program in 2014, each operating unit independently implemented departmental procedures to safeguard and protect Customer Information. There was no one

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**SoCalGas Response Question 22g(Continued):**

department responsible for oversight of keeping Customer Information protected nor was there a centralized process to release Customer Information. The SoCalGas Tariff Rule 42 was approved in August of 2013, which established the framework for Privacy and Security over covered information. Covered information includes customer information in combination with energy usage data from the advanced meter infrastructure. Along with SoCalGas Tariff Rule 42, the CPUC mandated that all of the investor owned utilities file an Annual Privacy Report and conduct an independent assessment of the controls over energy usage data. A Customer Privacy Program Manager was hired at the beginning of 2014 to administer Tariff Rule 42 and ensure the Annual Privacy Report and independent assessment was completed according to the timelines established in D.12-08-045. The Advanced Meter infrastructure allows SoCalGas to collect interval usage information which is exponentially more information than what has been collected from the utility customers in the past. This new interval data in combination with one or more personally identifying information could expose a customer's identity and must be protected. Having a Privacy Professional on staff and a formal program in place helps educate, reinforce and advise operating units on the new rules.

- h. SoCalGas issued policy statements on sharing aggregated and customer specific data at the beginning of 2013. Prior to this all activities related to safeguarding customer information were decentralized and under the responsibility of the management of each of the functional organizations. Costs were not tracked at the Customer Privacy activity level within each functional organization. Beginning in 2013, when the Customer Privacy working team was formed and the policies issued, the role of Chief Customer Privacy Officer was created.

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23. SCG states on page EDG-51 that “In compliance with CPUC D.12-08-045, SoCalGas has contracted with a third party to perform an independent privacy audit of SoCalGas’ data privacy and security practices. The audit is scheduled to be completed in September 2014.”
- a. Provide documentation that explains if SCG was authorized funding in D.12-08-045 or in its 2012 GRC (D.13-05-010) for its independent privacy audit of its data privacy and security practices, if yes, provide the amount authorized.
  - b. Provide documentation that demonstrates all costs incurred for the independent privacy audit of SCG’s data privacy and security practices. In the response include the third party contract documentation.
  - c. SCG states on page EDG-51 that “Assuming SoCalGas is on a three year rate case cycle, the next independent privacy audit will be conducted and reported to the CPUC as part of its TY 2019 GRC application.” Provide documentation that explains why SCG has included additional costs of \$117,000 in its 2016 GRC for an audit that “will be conducted and reported to the CPUC as part of its TY 2019 GRC application”.

**SoCalGas Response:**

- a. SoCalGas was not authorized funding in D.12-08-045 or in its TY2012 GRC. SoCalGas attempted to request funding in Advice Letter 4608-G and was informed that it must make a formal request for funding. The funding being requested in the TY 2016 GRC is a new formal request. See pages EDG-51 of Evan Goldman’s direct testimony Exhibit SCG – 11 – WP page 105 and 106 of 305 for details.
- b. The cost for the independent privacy audit was \$243,120. The milestone payments were made in two installments. The contract as well as the invoices supporting these payments are included with the attachments provided in response to Question 7.
- c. **RESPONSE REMOVED DUE TO CONFIDENTIALITY**
- d. Assuming a three year rate cycle, the TY2016 request includes funding for 2016 through 2018. SoCalGas has requested 1/3 of the expected audit costs in the TY2016 GRC in anticipation of the audit being conducted in 2017.

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24. SCG's Customer Service Other Office Operations and Technology forecast includes incremental funding in Exhibit SCG-11 to provide business systems analyst support for mobile applications that its customers utilize. SCG's TY 2016 GRC request includes funding for support for customer mobile applications in various areas (i.e., Exhibit SCG-12: Customer Service –Information, Exhibit SCG-18: Information Technology, etc.). Provide documentation that clearly explains why SCG is requesting additional ratepayer funding in Exhibit SCG-11 when it has embedded funding in historical expenses for customer mobile application support and is also requesting funding in other areas within its 2016 GRC for customer mobile application support.

**SoCalGas Response:**

SoCalGas' Customer Service Other Office Operations and Technology requested 1.5 FTEs as incremental funding in the GRC TY 2016 to support customer mobile applications. These FTEs are not the same as a developer, programmer or other IT professional. It is reasonable to expect that there is also incremental funding to support customer mobile applications in various areas within SoCalGas as this is a growing channel for customers as the support model crosses many functional areas within SoCalGas. In 2014, SoCalGas began accepting text to pay as a payment option. Aside from being able to pay bills through a mobile device, customers may access their account, find a payment location or compressed natural gas fueling station and review the Company's Privacy Policy and Privacy Notice. Historically, there were support costs for the customer mobile application as this work group provides analysts for change management, client support, requirements development, test execution, plus end user communication. The additional 1.5 FTEs are being requested in TY 2016 as the functions and features are expanding. Because of the new customer mobile application, additional FTEs are required to provide support for change management, client support, requirements development, test execution, and end user communication. Also, as this channel adoption increases the customer reliance on this channel demands more dedicated support staff. These resources are not the same as a Web Editor that is being requested in the testimony of witness Ann Ayres on page ADA-26, Table 6. A Web Editor is needed to ensure web design, content, and usability and accessibility standards are followed. The business systems analyst role is to gather business requirements, design system changes, plan and execute testing and to provide end user communications both internally and externally.

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25. SCG is requesting incremental funding of \$186,000 for 2 FTEs for increased data analytics support for the design, development, and ongoing maintenance. SCG states on page EDG-52 that its “Integrated Customer Data & Analytics (“ICDA”) project (#14826) will integrate customer information and operational transactions information to an updated data architecture platform with greater data mining and analytic capabilities”. SCG states on page EDG-63 that “The current data warehouse is a collection of many sources, requiring business analysts to navigate multiple databases and spend excessive time manually integrating data to answer basic business questions.”

Provide documentation that explains if SCG’s historical expenses include costs incurred by its FTEs to gather, compile, enter, and integrate customer data into SCG’s current data warehouse which is a collection of many sources that requires its business analysts to navigate through multiple databases and spend excessive time manually integrating data.

**SoCalGas Response:**

The incremental FTE’s will provide Data Governance support which is not included in SoCalGas’ historical expenses. Data Governance will be a new function starting in 2015. Their role is not to gather, compile, enter or integrate customer data; but rather to ensure the accuracy and accessibility of data and to provide cross-functional support regarding how data is defined and used across multiple departments and functional groups. These FTEs will manage compliance with data management policies and procedures, and facilitate resolution of data quality issues. They will also provide ongoing user training on processes and tools for analyzing customer data.

The Integrated Customer Data Analytics (ICDA) project is being implemented in order to improve the availability and accuracy of data used by SoCalGas to make business decisions. The business case for the ICDA project did not include cost savings related to reducing costs or headcount of business analysts at the company, however we do anticipate that providing better access to data and better tools for analysis will create more efficiencies for business analysts and allow them to focus on more value-added work activities

The volume of data that SoCalGas is managing is increasing exponentially, especially with the introduction of interval usage data provided by Advanced Meters. Since 2010, the volume of customer data that SoCalGas manages has more than doubled and is projected to more than triple again between now and 2019. It is critical that SoCalGas have the appropriate tools to manage the data to validate data quality, ensure customer privacy, and leverage data to gain business insights that will help us manage costs and enhance customer experience.

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26. Provide documentation that explains why SCG is requesting duplicate ratepayer funding to “integrate” customer data again to an updated data architecture platform in the TY 2016 instead of reallocating embedded historical costs from the same or similar activities or from eliminated and closed projects/processes for its proposed TY activities.

**SoCalGas Response:**

SoCalGas is not requesting duplicative ratepayer funding as stated by ORA in question 26. Please see response 1.e above for an explanation of incremental requests in CSOO SoCalGas assumes ORA is referring to the Integrated Customer Data Analytics (ICDA) capital project. Capital projects are not duplicative from embedded historical costs. SoCalGas did not request funding in TY 2012 GRC for ICDA or any related or similar project. If ORA is referring to Data Governance support from data analyst referenced in Q.25 above, SoCalGas has stated that the Data Governance is a new function that will be established in 2015 as part of the ICDA capital project. SoCalGas sees no instance of duplicate funding and has no current embedded historical costs that provide a centralized Data Governance function.

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27. SCG is requesting incremental funding of \$309,000 for 3 FTEs for business program management support for technology related customer initiatives. SCG states on page EDG-52 that “In mid-2013, consulting resources were engaged to help define and organize a business program management office (“BPMO”).” Provide documentation that demonstrates all costs incurred by SCG staff and consultants to help define and organize a business program management office.”

**SoCalGas Response:**

Please see the chart below along with the following attachments for invoices and contracts supporting the costs incurred by SoCalGas staff and consultants to help define and organize a business program management office in 2013. 2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015. The attachments below are *considered Confidential Pursuant to PU code Section 583 & General Order 66-C*

**REMOVED DUE TO CONFIDENTIALITY**

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28. Provide documentation that explains and demonstrates the work groups/business units, and FTEs that performed the activities and oversaw the delivery of major customer related projects and initiatives and collaborated with IT to ensure that projects were delivered prior to the formation of BPMO. In the response include all historical costs incurred for 2009-2013.

**SoCalGas Response:**

Both prior to and after the formation of the BPMO, projects were managed by the business unit responsible for the individual project as well as by project managers assigned from the information technology department. Costs for project management activities for each individual project in 2009-2013 were not tracked and reported separately; rather they are included in the individual project's capital budget. As described in direct testimony on page EDG-52, the BPMO activities are incremental and ensure that a disciplined, proven and uniform project management and tracking approach is utilized for all customer technology projects. This has become particularly important as the number of customer related technology initiatives has increased. A detailed description of governance activities is described in the attachment "ORA-SCG-DR-070-TLG-Q28Attachment.pdf."

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29. TY 2016 forecast for its Customer Contact Center Operations discussed on page EDG-18 in Exhibit SCG-11, include incremental funding of \$0.791 million for 12.6 FTEs to handle customer calls associated with Department of Transportation – Required Meter Set Assembly (MSA) Inspection program that “are described in the prepared direct testimony of witness Sara Franke, Ex. SCG-10.”
- a. Provide documentation that explains if during 2009-2013 SCG had CSRs/FTEs handling customer calls associated with its DOT-required MSA Inspection Program.
  - b. If SCG did not have employees handling customer calls associated with its DOT-required MSA Inspection Program during 2009-2013, state the reason why not.
  - c. If SCG did have employees handling customer calls associated with its DOT-required MSA Inspection Program, during 2009-2013 provide the number of FTEs involved in performing the work for each year and the associated costs incurred for the DOT-required MSA Inspection Program.
  - d. Provide documentation that explains why SCG is unable to reallocate costs embedded in its historical expenses from eliminated projects/processes, completed projects and/or overtime costs in order to address its proposed FTEs to perform activities associated with handling customer calls associated with its DOT-required MSA Inspection Program.

**SoCalGas Response:**

- a. From 2009-2013 SoCalGas did not have CSRs/FTEs in the Customer Contact Center that handled calls related to the DOT-required MSA Inspection Program. These activities have been traditionally handled by the Meter Reading department, which will be eliminated after full deployment of the AMI project.
- b. As stated in the response to 29.a. previous customer calls associated with DOT-required MSA inspections were handled by the Meter Reading department.
- c. Costs associated with MSA inspection activity, including the related customer calls are embedded in the 2009-2013 recorded adjusted costs for the four Meter Reading work groups - Meter Reading Operations, Meter Reading Clerical, Meter Reading Supervision/Training and Meter Reading Support. Please see direct testimony and workpapers of witness Sara Franke for Meter Reading Department costs (Exhibit No: SCG-10 and SCG-10-WP).
- d. The costs proposed to perform activities associated with handling customer calls associated with its DOT-required MSA Inspection Program are incremental requests related to new activities. CCC Operations does not have embedded historical expenses from eliminated projects/processes, completed projects and/or overtime costs that can be reallocated to handle this new incremental work as CSOO has already taken reductions totaling \$4,967,000 from 2013 base year adjusted recorded results. Additionally, the BY2013 adjusted recorded results and FTEs used as a starting point for TY2016 forecasts already reflect efficiencies that resulted in \$5,408,000 in avoided costs for rate payers (Please see Appendix A in Exhibit No SCG-11 for details.)

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30. SCG's TY 2016 forecast for its Customer Contact Center Operations discussed on page EDG-18 in Exhibit SCG-11 includes incremental funding of \$169,000 for 2.7 FTEs to provide customer outreach safety checks and \$47,000 for 0.8 FTEs for CSRs to offer appliance safety checks "as described in prepared direct testimony of witness Sara Franke Ex. SCG-10."
- a. SCG states in Exhibit SCG-10 on page SAF-15 that "Contingent on receiving funding in this GRC proceeding and beginning in 2016, SoCalGas proposes that when a customer requests an appliance check, the Customer Service Representative ("CSR") will offer the option of having the field technician check all of the customer's gas appliances when the technician is at the customer's premise." Provide documentation that explains in detail if SCG's CSRs have ever offered (2004-2014) to check all of the customer's gas appliances when the technician is at the customer's premise. If yes, provide historical costs incurred for this service. If no, state clearly why SCG never utilized authorized ratepayer funds to have its CSR offer this service prior to its 2016 GRC.
  - b. Provide documentation that explains if SCG is authorized incremental funding for its CSRs to "offer the option of having the field technician check all of the customer's gas appliances when the technician is at the customer's premise", and SCG's customers decline the service, or SCG is unable to provide the service, will SCG refund the unspent funds for this "option" back to ratepayers.
  - c. SCG's Tables 7 and 8 on page EDG-14 show the historical and forecast CSR answered call volumes. SCG's historical CSR call volumes show declining trends each year between 2009-2014 and an increase in customer self-service/IVR calls. Provide documentation that explains specifically why SCG is unable to utilize its 2013 expense levels or reallocate funding in the TY 2016 from eliminated or declining activities so that it could offer the option of having the its CSRs offer to have a field technician check all of the customer's gas appliances and offer customers the option of having field technicians perform customer outreach safety checks.
  - d. SCG states on page EDE-18 that "It is forecasted that 39,600 appliance safety checks will be issued by customer calls to CSRs and 10,400 will be issued through web or IVR self-service." SCG states in Exhibit SCG-10 on page SAF-17 that "Approximately 42% of SoCalGas' customers have not requested field technician service from SoCalGas within the last seven years. In support of SoCalGas' goal to continuously improve safety, contingent on receiving funding in this GRC proceeding and beginning in 2016, SoCalGas proposes to mail postcards to customers offering them the opportunity to have a field technician come out to the customer's premise to perform a safety check on all of the customer's gas appliances."

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**Question 30 (Continued)**

- e. Provide documentation that explains in more detail SoCalGas' proposal. If SoCalGas is not authorized incremental funding of \$169,000 for 2.7 FTEs is it SoCalGas' position that its CSRs will refuse to offer customers that have not requested services in seven years the opportunity to have a field technician come out to the customer's premise to perform a safety check on all of the customer's gas appliances." If this is not SoCalGas' position, provide documentation that explains what the impact will be on SoCalGas' Customer Contact Center Operations TY 2016 forecast based on SoCalGas statement on page SAF-17 that "contingent on receiving funding in this GRC proceeding and beginning in 2016."
- f. Provide documentation that explains in detail why SoCalgas has not utilized authorized funding prior to its 2016 GRC to have its CSRs offer customers the opportunity to have a field technician come out to the customer's premise to perform a safety check on all of the customer's gas appliances" if its "goal" is to "continuously improve safety."

**SoCalGas Response:**

- a. SoCalGas' CSRs have not offered to have field technicians check all of the customer's gas appliances when the technician is at the customer's premise during the years 2004-2014. Historical and previously-authorized costs do not include the additional average handle time (AHT) and associated costs that are required to offer to check all appliances. SoCalGas is proposing this additional service in order to further enhance safety as explained in the testimony and workpapers of witness Sara Franke (Exhibit No: SCG-10 and SCG-10-WP).
- b. Recognizing the many variables and priorities that are subject to change during any rate case cycle, longstanding Commission policy has been to authorize funding levels and then allow the utilities to manage operations within those funding levels. SoCalGas does not believe it would be appropriate to change Commission policy in this context. Nonetheless, SoCalGas has every intention of offering this enhanced safety service, in a manner consistent with authorized funding levels.
- c. The testimony and workpapers of witness Evan Goldman (Exhibit No: SCG-11 and SCG-11-WP) explain the individual adjustments for the changes in activity from Base Year 2013 to TY2016. Specifically included in those adjustments is a reduction of \$1,224,000 from Base Year 2013 activities for continued customer adoption of self-service that is only partially offset by the increases of \$169,000 to support customer outreach safety checks and \$47,000 to offer expanded appliance safety checks to all gas appliances. On a broader scale, CSOO has already included reductions totaling \$4,967,000 from 2013 base year adjusted recorded results. Additionally, the BY2013 adjusted recorded results

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**SoCalGas Response Question 30c (Continued):**

and FTEs used as a starting point for TY2016 forecasts already reflect efficiencies that resulted in \$5,408,000 in avoided costs for rate payers (Please see Appendix A in Exhibit No SCG-11 for details.)

- d. SoCalGas could not determine if there was an actual question from ORA associated with 30d, as it only lists what SoCalGas witnesses stated in direct testimony. Please see the response to questions 30.c and 30.e for more details about SoCal Gas' position regarding "contingent on receiving funding in this GRC proceeding and beginning in 2016."
- e. SoCalGas does not have additional documentation beyond that which has already been provided in the testimony and workpapers of SoCalGas witnesses Sara Franke and Evan Goldman (Exs. SCG-10, SCG-10-WP, SCG-11 and SCG-11-WP). Without the funding to cover the cost, SoCalGas would not offer its proposed Outreach Safety Checks, as set forth in Ex. SCG-10, page 17. SoCalGas has not requested nor been authorized funding for this service in the past hence this service has not been provided by SoCalGas. The need for this expanded safety service was identified as SoCalGas was preparing for its TY 2016 GRC.

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31. SCG's Customer Contact Center Support forecasts \$10.381 million (\$31.143 million over three years) in TY 2016. This is an increase of \$1.191 million or 12.96% over 2013 recorded adjusted expenses of \$9.190 million. The five year average (2009-2013) is \$8.670 million. SCG's recorded expenses fluctuated slightly and the highest recorded expense level was in 2013.
- a. In regards to SCG's proposed Analyst position to support its interactive voice response (IVR) system, SCG states on page EDG-26 that "This position has previously been part of IVR capital projects but has been required for ongoing support and maintenance since 2014." Provide documentation that explains why SCG is not able to reallocate funding in TY 2016 for this position.
  - b. SCG replaced/refreshed its IVR system in 2009. Provide documentation that explains how SCG maintained and supported ongoing activities for its IVR during 2009-2013. In the response include the incurred costs and the total number of FTEs assigned to the maintenance and ongoing support of SCG's IVR during 2009-2013.
  - c. Provide documentation that demonstrates the amount SCG requested and was authorized in its 2012 GRC for its IVR and related technology refresh.
  - d. SCG states on page EDG-26 that "The IVR Team Lead position was added in 2014." Provide 2014 recorded expenses for SCG's Customer Contact Center Support.
  - e. SCG states on page EDG-26 that "The IVR user experience has also significantly improved. In 2014 the IVR Doctors and Market Strategies International recognized SoCalGas as the "Top U.S. Company" in their Annual Energy Utility IVR Benchmark Report. In the 2013 E Source Review of North America Electric and Gas Company IVRs, the SoCal Gas IVR scored in the first quartile (up from third quartile in 2011)." Provide documentation that explains clearly the SCG IVR time period (i.e., what years of recorded IVR data was analyzed to make the determinations) was utilized as the basis for the 2014 IVR Doctors and Market Strategies International Annual Energy Utility IVR Benchmark Report and the 2013 E Source Review of North America Electric and Gas Company IVRs Report.
  - f. SCG states on page EDG-27 that "there is currently no broad-based review and analysis of escalated customer issues to identify reoccurring or systemic problems." Provide documentation that explains if during SCG's 2008 and 2012 GRCs, SCG's management was aware that "there is currently no broad-based review and analysis of escalated customer issues to identify reoccurring or systemic problems."

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**Question 31 (Continued)**

- g. If SCG’s management believes that it is important to implement procedures to conduct broad-based reviews and analysis of escalated customer issues to identify reoccurring or systemic problems, then provide documentation that explains in detail specifically why SCG’s management did not utilize authorized funding from its 2008 and 2012 GRCs to address this activity and why SCG is waiting until its 2016 GRC to request seven incremental FTE positions if this issue is considered important.
- h. Provide documentation that explains if SCG failed to handle customer issues, complaints and escalations completely that were filed during 2009-2013 and has customer complaint backlogs that needs to be addressed in TY 2016.
- i. SCG states on page EDG-28 that it “is requesting \$185,000 to provide responsive service to customers through an online web chat service (“chat”)...This request is for ongoing software licensing required to support chat as start-up costs are planned prior to TY 2016.” Provide documentation that explains if SCG has incurred any “start-up costs” for its online web chat service since “start-up costs are planned prior to TY 2016.” If so, state the costs incurred and the related activity.
- j. Provide documentation that explains if SCG’s 2009-2013 expenses include costs for software licensing that SCG will not renew in TY 2016, or includes costs for projects that SCG completed or includes funding for projects/programs that were proposed (including authorized funding for additional FTEs that were not hired) but the projects/programs were never completed.
- k. Provide documentation that explains/clarifies SCG’s statement on page EDG-27 regarding “comprehensively handle customer issues, complaints and escalations.” In the response state how SCG is currently handling customer issues, complaints and escalations if SCG is not currently handling customer issues, complaints and escalations “comprehensively” .
- l. SCG states on page EDG-27 that “If this request is approved, SoCalGas will be able to expand the analytical capability of its Special Investigations team to provide greater coverage and quicker response to complaints.” Provide documentation that clearly explains SCG’s statement. Is it SCG’s position that if it is not authorized its full incremental funding request of \$569 million for 7 additional FTEs, then its Special Investigations team will provide less coverage than the present coverage that was provided to customers in 2013 and it will provide slower responses to customer complaints than it provided in 2013.

**SoCalGas Response:**

- a. SoCalGas is not able to reallocate funding in TY 2016 for the IVR Analyst position because the position is needed to support incremental work over and above what was reflected in BY2013 adjusted recorded. The TY 2016 request already reflects

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**SoCalGas Response Question 31a (Continued):**

\$4,967,000 in efficiencies from BY2013 results. The number of calls handled completely by the SoCalGas IVR (without going to a CSR) has more than doubled since 2009 increasing from 1,548,149 in 2009 to 3,266,048 in 2014. This increase has been a direct result of expanded IVR functionality. As the scope of the IVR has expanded, additional support is required to ensure that the IVR continues to handle the increased utilization. Without the additional IVR analyst position supporting the IVR, it will not be possible to maintain the level of adoption and user experience achieved.

- b. From 2009 to 2011, the primary focus for the IVR was implementing regular maintenance and troubleshooting production issues and was performed by the technology team which is currently in the IT department and is not in CCC Support. The IVR self-service rate at the end of 2011 was 19.9%. In 2012, the focus shifted to improving usability and enhancing functionality, and a Customer Experience Advisor was assigned to the project. In March 2013, an IVR capital project started and the labor shifted from O&M to capital. The IVR self-service rate increased to 24% in 2012, 29.9% in 2013, and 36.0% in 2014. The new positions requested to support the IVR do not have historical costs in the 2009-13 time period. Previous IVR support provided by the technology team will continue.

**CCC Support O&M FTEs for Maintenance & Ongoing Support of the IVR**

	Year				
	2009	2010	2011	2012	2013
Operations Support					
FTEs	-	-	-	0.75	0.25
Labor Dollars (\$000)	-	-	-	\$ 60	\$ 20

- c. SoCalGas' TY2012 GRC request related to the IVR technology refresh was included in the testimony and workpapers of witness Richard Phillips (Exhibit No.: SCG-13 and SCG-13-WP). Please see the highlighted portion of the chart below from witness Richard D. Phillips' capital workpapers, Exhibit No.: SCG-13-CWP. The portion of the Intelligent Customer Experience project dedicated to SCG's IVR technology refresh included a request for \$878K in 2010, \$915K in 2011, and \$172K in 2012 (all in 2009\$). It should be noted that SoCalGas' TY 2012 GRC Decision (D.13-05-010) did not specifically approve or deny its IT capital projects. Rather, D.13-05-010 authorized a total number for all of SoCalGas' IT capital project requests.

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**SoCalGas Response Question 31c(Continued):**

<b>Sub-Projects/Phases</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>Remaining Years</b>
OpEx 20/20 Customer Care - ICE Self Service IVR	878	915	172	0
OpEx 20/20 Customer Care - ICE Self Service HBA	0	2177	0	0
OpEx 20/20 Customer Care - ICE Self Service IVR (Billable from SDG&E)	200	533	390	0
<b>Total</b>	<b>1078</b>	<b>3625</b>	<b>562</b>	<b>0</b>

- d. 2014 financial information will not be available until after SoCalGas makes its 10-K filing with the SEC in early 2015. It is currently expected that SoCalGas will provide the adjusted recorded 2014 financial information to ORA in March 2015.
- e. The 2014 IVR Doctors / Market Strategies International Annual Energy Utility IVR Benchmark Report as well as the 2013 E Source Review of North America Electric and Gas Company IVRs Report reviewed and benchmarked the current state of the SoCalGas IVR compared to other utilities.. The reviews were not based on historical performance. The eSource IVR reviews were primarily completed between mid-April 2013 and mid-July 2013 and the assessment reflects the functionality and user experience of the SoCalGas IVR at that time.

Documentation regarding the time period can be found beginning on page 8 of the attached document. The IVR Doctors and Market Strategies International benchmarking review of SoCalGas took place in March of 2014. Documentation regarding the date of the review can be found on page 116 of the attached document.

**REMOVED DUE TO CONFIDENTIALITY**

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**SoCalGas Response Question 31 (Continued):**

- f. The TY 2008 and TY 2012 GRCs did not request incremental funds for completing broad based reviews of escalated customer complaints and comments. Specifically, TY 2016 GRC requested incremental funds to conduct broad, trend-based analysis based on multiple sources of data, including customer comments within the Customer Comment Tracking System (CCT), and escalated complaints through one of multiple channels, including letters written to senior executives of SoCalGas and Sempra, and/or informal complaints through the PUC's Consumer Affairs division, regarding a potential issue with SoCalGas. The incremental need was identified during a Lean-Six-Sigma project conducted in 2013 designed to improve technical efficiencies of the CCT system. Customer comment data from the contact center, branch offices, and local district offices were addressed on a case-by-case basis. However no single organization was evaluating the data for service trends, common process errors, or other systemic service impacting issues. In addition to the CCT data, escalated complaints were likewise handled on a case by case basis, and common trends/issues were not readily analyzed due to resource constraints.

Additionally, Social Media and other expanded channels for customers to express concerns with the level and quality of Customer Service being provided by SoCalGas have brought greater awareness to a need for a root cause approach that identifies and proactively solves customer issues. By expanding the Customer Investigations Team to include Analysts who can track trends and identify opportunities to optimize SoCalGas' systems or procedures, SoCalGas can improve overall customer service levels and satisfaction.

- g. As outlined in response to (f) above, the need was identified during and after the completion of a technical project designed to improve functionality of the Customer Comment Tracking system in 2013. This incremental request and gap in analysis was not within scope or awareness of management for the 2008 and 2012 GRCs.
- h. To the best knowledge of SoCalGas management, SoCalGas was able to fully handle all customer complaints during 2009-2013. Complaints submitted through the PUC are given priority. Specifically, based on a service level agreement with the PUC, SoCalGas is required to resolve complaints to the CPUC within 20 working days. While SoCalGas believes it was able to fully handle all customer complaints from 2009-2013, SoCalGas acknowledges it was out of compliance in 2013 in regards to response time to informal complaints (average of 22 days). By investing in resources focused on identifying and solving systematic problems that lead to or contribute to customer complaints, SoCalGas hopes to improve its level of customer service and avoid falling out of compliance in future years.

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**SoCalGas Response Question 31 (Continued):**

- i. SoCalGas has not incurred any start-up costs for its online chat service at this time but plans to begin offering this feature during 2015. Please see Exhibit No SCG-11-WP page 27 of 305 for a description of costs forecasted for 2015 and page 29 of 305 for forecasted TY2016 costs.
- j. The Quest Software licensing fee of \$25,000 ended in 2012. There are no non-recurring costs included in base year 2013 or in our TY 2016 GRC forecast. All 2013 software license expenses are planned to be renewed in 2016.

The Operations Support TY 2012 GRC incremental expenses that were authorized and funded were implemented. However, the High Bill Analyzer tool software maintenance fee is paid by the Advanced Meter department. All funded proposed projects/programs were completed and FTEs were hired.

- k. SoCalGas is currently comprehensively handling customer issues, complaints, and escalations. Customer calls to the contact center are escalated through leads, supervisors, managers, and the Special Investigations team. Informal complaints to the PUC are directly routed for completion to the Special Investigations team. Calls to the PUC are handled by management personnel within the Special Investigations team. Letters or emails written to executives, calls to executive offices, or other requested contact with executives are likewise handled by management personnel within the Special Investigations team. Incremental requested funding would allow systematic review and analysis of all escalated issues in a comprehensive and end-to-end process manner. Through a more complete systematic analysis beyond the case-by-case resolution, SCG believes that potential service optimization opportunities, policy changes, and/or efficiency improvements can be identified.
- l. Note: ORA inadvertently misstated SCG's request as \$569 million for 7 additional FTEs. SoCalGas' incremental request is for \$569,000 to add 7 FTEs.

As outlined in the request for incremental funding, and in the submitted workpapers, the incremental workforce is to a.) provide trend based analysis and process improvement support to data collected within the Customer Comment Tracking system (CCT) as well as escalated issues through multiple channels, b) provide consistent operational and service coverage of social media channels (Twitter, Facebook, Instagram, etc.), and c) supplemental coverage for escalated executive or PUC issues.

It is not SoCalGas' position that if not authorized the full incremental request that it would

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provide less coverage than present or slower response times than SoCalGas is currently providing. Coverage and response times would remain as they were in 2013, provided the volume of complaints remains as it was in 2013. SoCalGas believes that a more systematic analysis of customer comments and complaints will provide additional insight that will lead to service optimization, increased customer satisfaction and improved efficiencies. SoCalGas will continue to process each customer comment/complaint on a case by case basis, but in addition will identify systemic and process issues more quickly.