DATE RECEIVED: FEBRUARY 25, 2015 DATE RESPONDED: MARCH 11, 2015

Exhibit Reference: SCG-24

Subject: Regulatory Affairs, Accounting and Finance, Legal and External Affairs

Please provide the following:

1. For All departments and/or divisions in Ex. SCG-24, where SCG has requested increased staffing, please provide copies of all studies and/or workload analyses used to develop each of SCG's increased staffing forecasts. If no such studies or analyses were conducted, please so state, and explain why SCG believed it was not necessary to conduct such studies or analyses to support their forecasts for increased staffing.

SoCalGas Response 01:

Please note that "FTE's" are not hired as they do not represent headcount. "Headcount", or staffing, does not equal "Full Time Equivalent (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. 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. Therefore, it would be incorrect to say that forecasted FTE's are hired or that an increase in FTE's means a direct increase in staffing.

Given that clarification, SoCalGas has requested increased FTE's in the following areas:

These increases are requested to support increased work activities in each of these areas. While no formal study was conducted, management assessment was completed based on current staffing levels and work load to support critical activities in these two areas. Please refer to the referenced testimony sections in the table below for discussion regarding these incremental staff.

DATE RECEIVED: FEBRUARY 25, 2015 DATE RESPONDED: MARCH 11, 2015

SoCalGas Response 01:-Continued

Department	Testimony Reference	Incremental Staff Description
Regulatory Affairs	II.C. Case Management	Case Manager
Accounting & Finance	III.G. Financial and Operational	Senior Business Analyst
	Planning	
Accounting & Finance	III.E. Claims	Claims Coordinator
Law Department	IV.F. Commercial and	Commercial & Environmental
	Environmental	Managing Attorney
External Affairs &	V.B. Communications (Media	Intranet Designer/Programmer,
Employee	and Employee)	Media & Employee
Communications*		Communications Specialist, and
		Social Media/Videographer
		Communications Specialist
External Affairs &	V.C. Community Relations	Community Relations Manager
Employee		
Communications*		

^{*}Please see response to questions 3 and 4 for further explanation.

Please note that there are other labor cost increases included in the 2016 forecast related to increased FTEs. These increases are primarily in the Accounting and Finance Division and are related to changes in the mix of work activities (capital to O&M shift) or as the result of filling vacancies in the organization. The FTE increases in these areas do not necessarily reflect increased staffing levels above currently authorized (e.g., increase in headcount).

ORA DATA REQUEST ORA-SCG-DR-085-GSD SOCALGAS 2016 GRC – A.14-11-004 SOCALGAS RESPONSE DATE RECEIVED: FEBRUARY 25, 2015

DATE RECEIVED: FEBRUARY 25, 2015
DATE RESPONDED: MARCH 11, 2015

2. Regarding the Regulatory Affairs Division, GRC and Revenue Requirements group, SCG stated "the increase request is not related to additional staffing, but related to the reclassification of employee costs from capital to O&M." (p. RG-8, lns. 24-26). State where SCG made a corresponding reduction to the capital side and show in workpapers (which exhibit, and page number) where this reduction to capital is shown.

SoCalGas Response 02:

On page 651 of Exhibit SCG-18-CWP (Information Technology capital workpapers of Chris Olmsted), the transfer of capital labor to O&M is reflected in the \$0 labor forecast for 2015-2016. Similarly, on page 116 of Exhibit SCG-24-WP (Workpapers supporting the Direct Testimony of Ramon Gonzales), the labor adjustment from 2014 to 2015 of \$25k accounts for the transfer of capital labor to O&M.

DATE RECEIVED: FEBRUARY 25, 2015 DATE RESPONDED: MARCH 11, 2015

3. Regarding the External Affairs & Employee Communications Division, SCG workpapers pages 64-67, SCG is increasing FTEs for Employee Communications Division from 6 in 2013 to 9 in 2016, a 50% increase. (a) Describe how the increased responsibilities are handled at this time. (b) Is there a study or workload analysis that justifies this increase from 6 to 9 FTEs? If so, please provide a copy of the study.

SoCalGas Response 03:

Please note that "FTE's" are not hired as they do not represent headcount. "Headcount", or staffing, does not equal "Full Time Equivalent (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. 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. Therefore, it would be incorrect to say that forecasted FTE's are hired or that an increase in FTE's means a direct increase in staffing.

Given that clarification, SoCalGas has the following response:

- a. SoCalGas asked for 3 incremental staff in the Media & Employee Communications Department to meet increasing demands for more visual and social media content, as described in the direct testimony of Ramon Gonzales, SCG-24 Section V.B. The media & employee communications specialist position was brought on in 2015, to begin to help manage the media line and to provide employee communications support on subjects such as safety, service, clean natural gas technologies and employee development and knowledge management programs. For the other two requested positions (intranet designer/programmer and social media/videographer communications specialist), we cannot currently address these needs effectively. With dedicated positions, we feel we can more effectively expand our current social media efforts and increase our ability to provide visual messaging through video and web design. The addition of these new skills will allow us to better communicate with the public and our employees.
- b. No formal study or workload analysis is compiled for this department.

DATE RECEIVED: FEBRUARY 25, 2015 DATE RESPONDED: MARCH 11, 2015

4. Regarding the External Affairs & Employee Communications Division – Community Relations group, SCG requests an additional FTE and increased non-labor costs to support on-going activities such as community outreach. As shown on SCG workpapers page 144, SCG describes the responsibilities of the proposed New Community Relations Manager. As stated in testimony, SCG already has one Community Relations Manager. (a) Is SCG proposing to have two Community Relations Managers? (b) How is SCG currently handling these described responsibilities at this time? (c) How will these responsibilities be divided between two Community Relations Managers?

SoCalGas Response 04:

Please note that "FTE's" are not hired as they do not represent headcount. "Headcount", or staffing, does not equal "Full Time Equivalent (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. 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. Therefore, it would be incorrect to say that forecasted FTE's are hired or that an increase in FTE's means a direct increase in staffing.

Given that clarification, SoCalGas has the following response:

- a. As described in the direct testimony of Ramon Gonzales, SCG-24 Section V.C., the Community Relations forecast includes an additional Community Relations Manager.
- b. SoCalGas focuses on growing and building relationships in the community in a number of focus areas including, but not limited to, education, environment, workforce development, veterans' affairs, and local community support. Community Relations is a very lean organization that supports the entire service territory Central to Southern California in 12 counties. The request for the additional staff represents work that needs to be done to more effectively build partnerships with community organizations in the service territory.

ORA DATA REQUEST ORA-SCG-DR-085-GSD SOCALGAS 2016 GRC – A.14-11-004 SOCALGAS RESPONSE DATE RECEIVED: FEBRUARY 25, 2015

DATE RECEIVED: FEBRUARY 25, 2015 DATE RESPONDED: MARCH 11, 2015

SoCalGas Response 04:-Continued

c. Due to the size of the service territory and increasing needs to grow and foster partnerships with community leaders and organizations, the work load will be split among the two Community Relations Managers, with one manager's primary focus in education and workforce development, and the second manager's primary focus on environment and veterans' affairs. Both managers will work collaboratively to foster growth and support with community leaders to align with the company's strategic priorities.