

**NDC-SEU DATA REQUEST-004**  
**SOCALGAS- SDG&E 2019 GRC – A.17-11-007/8**  
**DATE RECEIVED: MARCH 6, 2018**  
**DATE RESPONDED: MARCH 20, 2018**

1. Regarding the request for an Americans with Disabilities Act (ADA) Project Manager (9 SDGE-18 at JDS-39):

- a. How many employees at SDGE currently hold the position of Americans with Disabilities Act (ADA) Project Manager? What are their annual salaries?
- b. How many other employees have authority and responsibilities substantially equivalent to those of an ADA Project Manager, as described in SDGE-18 at JDS-39? What are their titles and annual salaries?
- c. How many other employees have responsibilities that pertain to ADA compliance-related activities at SDGE? What are their titles and annual salaries?

**Utilities Response 1:**

- a. SDG&E does not have anyone currently in an ADA Project Manager position.
- b. SDG&E objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it is vague and ambiguous as to what is meant by the phrase “have authority and responsibilities substantially equivalent to.” Subject to and without waiving the foregoing objection, SDG&E responds as follows: SDG&E does not currently have employees with substantially equivalent authority and responsibility to the position of ADA Project Manager.
- c. SDG&E currently has a number of employees who share the responsibilities for ADA compliance, and a portion of their time is spent on ADA activities related to their specific work area. The chart below is a non-exhaustive list of some of the roles with ADA compliance responsibilities.

<b>Activity</b>	<b>Job Titles</b>	<b>Market Reference Range MRR</b>
Website	Communications & Web Manager	\$107,600 - \$161,400
Emergency Customer Communication System	Emergency Services Manager	\$95,500 - \$143,300
Written Communications	Customer Programs Supervisor	\$95,500 - \$143,500
Branch Office	Project Manager-1	\$83,200 - \$124,00
Large Print Font	Customer Communications Manager	\$107,600 - \$161,400
Pedestrian Rights of Way	Technical Advisor-II	\$94,200 - \$141,300
Utility Poles	Construction Standards Administrator	\$72,400 - \$108,600
Coordination with Local Governments	Project Management Manager	\$107,600 - \$161,400

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2. SDGE states that “The ADA Project Manager position will support ADA compliance related activities throughout SDG&E as ADA standards and regulations continue to change particularly in regards to publicly accessible facilities and communications channels.” (SDGE-18 at JDS-39).
  - a. For each year since 2012, describe the ADA standards and regulations that have changed. Describe the “ADA compliance-related activities” that were necessary in response to the changes, including the time and cost to implement those activities.
  - b. Describe any significant changes to ADA standards and regulations that are anticipated over the next GRC period. Also describe the “ADA compliance-related activities” that would be necessary in response to such anticipated changes, including estimated time and cost to implement those activities.

**Utilities Response 2:**

- a. SDG&E objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that calls for a legal conclusion and the changes in ADA laws and regulations are a matter of public record and equally available to NDC. SDG&E will not be providing NDC with the applicable laws related to ADA or a statement of the requirements to comply with such laws and regulations. SDG&E further objects to this request on the grounds that it seeks the production of information where the burden, expense, and intrusiveness of the request is outweighed by the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, SDG&E responds as follows: Since 2012, SDG&E has made numerous changes as part of its compliance with ADA rules and regulations. It does not maintain a database containing all of the changes and related costs for ADA compliance. Two examples of activities related to ADA compliance are changes made to each branch office for compliance with ADA reach and accessibility requirements, and changes made to SDG&E’s website for compliance with web accessibility WCAG 2.0, Level AA guidelines.
- b. SDG&E objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that calls for a legal conclusion and the changes in ADA laws and regulations are a matter of public record and equally available to NDC. SDG&E will not be providing NDC with the applicable laws related to ADA or a statement of the requirements to comply with such laws and regulations. Subject to and without waiving the foregoing objection, SDG&E responds as follows: The ADA Project Manager position will require training and certification as a Certified Access Specialist (CAS). This position will work to ensure that our company facilities are in compliance with existing ADA-related laws and regulations and aware of changes in such laws and regulations at both the state and federal levels. Compliance-related activities will occur once new laws and regulations are promulgated. SDG&E is unable to quantify the estimated cost and time involved to implement changes in unknown future ADA requirements.

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3. Provide a breakdown of the requested \$150,000 labor and \$130,000 non-labor increase

over BY 2016 associated with the ADA Project Manager position. (SDGE-18 at JDS-38; SDGE-18-WP at 68). Please identify where in testimony this breakdown is included. Also specify which non-labor expenses (e.g. consulting services, training materials, conference fees) will be incurred annually.

**Utilities Response 3:**

\$150,000 labor is for a newly created position to manage and maintain oversight of SDG&E ADA-related compliance and educational training. Including compliance with all federal and state laws and regulations that protect the rights of people with Disabilities to include full and equal access to places of public accommodations, hearing and speech, mobility, construction standards, pedestrian rights of way, vision disabilities, effective customer communications via website and utility right of way requirements. This newly created position has been assigned a title of Project Manager-III. Market Reference Range (MRR) for a PMIII is \$105,400 - \$158,100.

\$130,00 non-labor is to cover costs for ADA-related activities as summarized below:

<b>Non Labor Activities</b>	<b>Cost Estimates (Constant \$2016)</b>
On-going audits for branch offices and authorized payment locations	\$ 9,000
Large font and Braille collateral	\$ 20,000
Employee education	\$ 20,000
ADA industry conference and related travel	\$ 3,500
Website testing (manual/functional testing and automated tool)	\$ 50,000
Website accessibility captioning, audio description and scripts on video	\$ 27,000
Annual professional fees	\$ 500
Total	\$ 130,000

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4. Provide a breakdown of the TY 2019 \$312,000 non-labor costs related to self-service kiosks under the “Business Optimization” category. (SDGE-18 at JDC-39; SDGE-18-WP at 68). Please identify where in testimony this breakdown is included.

**Utilities Response 4:**

A breakdown of costs are not included in testimony or workpapers.

Kiosk Turnkey and Maintenance Fees	\$203,000
DSL/Telco	\$30,000
GARDA/Armored Transport	\$55,000
Bulk Bill Acceptor Maintenance	\$24,000
<b>Total Annual Ongoing Cost</b>	<b>\$312,000</b>

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5. Provide a breakdown of the forecast 2018 \$78,000 non-labor costs related to self-service kiosks under the “Business Optimization” category. (SDGE-18-WP at 68). Please identify where in testimony this breakdown is included.

**Utilities Response 5:**

A breakdown of 2018 forecasted costs are not included in testimony.

Kiosk Turnkey and Maintenance Fees	\$50,750
DSL/Telco	\$7,500
GARDA/Armored Transport	\$13,750
Bulk Bill Acceptor Maintenance	\$6,000
<b>Total Annual Ongoing Cost</b>	<b>\$78,000</b>

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6. SDGE states that, “The forecast for the Branch Office Kiosk Replacement project for 2017, 2018, and 2019 are \$150,000, \$1,837,000, and \$0, respectively.” (SDGE-18 at JDS-72). Provide a breakdown of these forecast capital costs, and identify where in testimony this breakdown is included. Please also provide the actual costs for the phase 1 pilot of replacements that was scheduled to be completed in Q4 2017.

**Utilities Response 6:**

A breakdown of these forecasted capital costs is not included in testimony.

<b>Details</b>	<b>Estimate 2018 (Constant \$2016)</b>
Labor	\$ 429,000
Hardware	\$ 660,000
Installation Services	\$ 748,000
<b>Total</b>	<b>\$ 1,837,000</b>

2017 actual recorded costs (constant \$2016) for the Branch Office Kiosk Replacement project are \$91,351. Completion of the phase 1 pilot of kiosk replacement is currently delayed.

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7. Regarding the outdated kiosks targeted under the Branch Office Kiosk Replacement project (SDGE-18 at JDS-71):

- a. How old are each of the 10 existing outdated kiosks that are being replaced?
- b. How many of the 10 existing outdated kiosks have the capability to accept credit/debit card payments, check payment through ACH transfers, and perform account number lookup options?
- c. For each year since 2012, how many “on-going issues with existing antiquated kiosks” has SDGE needed to “troubleshoot and track”? (SDGE-18 at JDS-71). What has been the time and cost to SDGE of these issues beyond normal operating expenses, and explain how SDGE has calculated those amounts.

**Utilities Response 7:**

- a. 12 years
- b. None
- c. SDG&E objects to this request to the extent that it mischaracterizes the testimony contained in Exhibit SDG&E-18 at pages JDS 71-72. SDG&E clarifies its testimony as follows: SDG&E has contracted with a vendor for regular service and maintenance of the kiosks. As the kiosks have aged, they have been subject to more frequent operational issues, requiring vendor assistance and troubleshooting by branch employees. SDG&E does not maintain a log that tracks issues experienced with the existing kiosks, or the amount of time employees have spent troubleshooting such issues. Any costs for replacement of kiosk parts or repairs are not separately tracked and the burden, expense and intrusiveness of the request to identify such costs since 2012 outweighs the likelihood that the information sought will lead to the discovery of admissible evidence

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8. What is the estimated useful life of the 15 new kiosks to be installed under the Branch Office Kiosk Replacement project (SDGE-18 at JDS-71)?

**Utilities Response 8:**

SDG&E is currently analyzing its options for replacement equipment. Estimated useful life will depend on the equipment selected and SDG&E is unable to provide a definitive response at this time.