- 1. At p. MG-18:5-9, SCG states, "While there is no supporting data on costs savings, the Company did implement a new interactive driver safety program in June 2017 and has already seen reductions in controllable motor vehicle incidents (CMVI). When comparing data from June December 2017 to the 2012-2016 average of the same six-month timeframe, there was a 35% reduction in the number of CMVIs."
 - a. Please identify the CMVI that is relevant to the comparison made in the referenced paragraph for each month in the years 2012-2018. If monthly CMVI are not available for any period, please provide annual data. Please ensure that the CMVI is calculated on the same basis as was used in the referenced comparison.

Utility Response 1:

The CMVI number identified in SCG-232 on MG-18 refers to the average number of CMVIs in June-December (2012-2016) compared to June – December 2017 for various company locations. The June – December 2017 total reflects the number of CMVIs upon the pilot implementation of the interactive driver safety program. See attachment "TURN-SEU-071_Q1 Attachment for SCG" for the data.

- 2. Please describe the new interactive driver safety program [that SCG implemented] in June 2017. Please also provide the following information:
 - a. The number of employees involved during the referenced time period.
 - b. The group(s) of employees (meter readers, customer service, linemen etc.) that were involved in the referenced program.
 - c. Were the employees to whom the program was applied new and/or incumbent? (If both, please provide a percentage breakdown between the two categories)?
 - d. Had the employees involved in the referenced program ever before had driver training prior to participating in the new-program June-December implementation? (If some had and some had not, please provide the percentage ratio between the two.)
 - e. Please explain how the referenced program is relevant to the programs envisioned for 2019 as part of the GRC explanation on p. 59 of SCG-32-WP.
 - f. Please explain how the referenced program is not relevant to those envisioned for 2019 as part of the GRC explanation on p. 59 of SCG-32-WP?

Utility Response 2:

- a. There were 1,000 drivers involved during the referenced time period.
- b. Employees who participated in this program were from the Customer Service Field, Distribution, Engineering Analysis Center, Pico Fleet and Meter & Regulator (M&R) groups.
- c. All the individuals who participated in this program were incumbent employees.
- d. Yes, the employees who participated in this program had received Smith System® Defensive Driver training.
- e. The interactive driver safety program is included as part of the 2019 RAMP Incremental explanation and costs on p. 59 of Exhibit SCG-32-WP. Although not specifically stated in the work papers, of the \$5.386 million in RAMP incremental costs in TY 2019, approximately \$2.165 million (\$254,750 labor and \$1.911 million non-labor) is forecasted for the new interactive driver safety program.
- f. See response to question 2e.

3. Please explain why SCG did not include the referenced CMVI improvement results in the response to SEU-TURN-24-3?

Utility Response 3:

SCG did not include the referenced CMVI improvement in SEU-TURN-24-3 because there are no formal reports, and at the time, we had no finalized results of the pilot study, as the pilot study was still going on. The referenced CMVI improvement discussed in my Rebuttal Testimony SCG-232 is based on numbers tracked on an ongoing basis while the pilot program was taking place. The pilot did not conclude until June 2018.

4. At p. MG-22 (lines 11-19) of Ex. SCG-232, SCG states, "SoCalGas implemented Director and Manager training programs in 2015 and implemented a new director program in 2017, which will continue through TY 2019 and beyond. ... SoCalGas confirms it did indeed implement a key manager and director program in 2015, starting with training directors first and then managers from Q4 2015. This is continuing through 2018. The program implemented in 2015 has been utilized as a training for managers starting in April 2016. The 2017 and 2018 trainings were designated for high potential managers and SoCalGas expects to continue this program with high potential managers through 2019 and beyond." Please identify the recorded cost for the Director and Manager training programs in each month, from its Q4 2015 start date through May 2018.

Utility Response 4:

See attachment "TURN-SEU-071_Q4 Attachment for SCG" for the recorded costs for the Director Development Program and Manager training programs. Audited 2018 data is not available.