

Application: A.23-11-XXX  
Witnesses: Christopher Bissonette, Bonnie Burns, Ralf Balzer, Orlando Carrasquillo,  
and Ernie Cervantes  
Chapter: 2

**PREPARED TESTIMONY OF  
CHRISTOPHER BISSONNETTE, BONNIE BURNS, RALF BALZER, ORLANDO  
CARRASQUILLO, AND ERNIE CERVANTES  
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY  
(COVID-19 CEMA EVENT OVERVIEW)**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



November 3, 2023

**TABLE OF CONTENTS**

		<b>Page</b>
I.	PURPOSE .....	1
II.	COVID-19 PANDEMIC.....	1
	A.    Event Background.....	1
	B.    Governmental Orders.....	2
	C.    COVID-19 Cases in SoCalGas’s Territory.....	3
	D.    SoCalGas’s Response to COVID-19 .....	4
	1.    O&M Activities.....	6
	2.    Capital Activities.....	28
III.	WITNESS QUALIFICATIONS.....	30

1           **PREPARED TESTIMONY OF CHRISTOPHER BISSONNETTE, BONNIE BURNS,**  
2           **RALF BALZER, ORLANDO CARRASQUILLO, AND ERNIE CERVANTES**  
3           **(COVID-19 CEMA EVENT OVERVIEW)**

4   **I.       PURPOSE**

5           The purpose of this testimony is to present the factual background of the novel  
6 coronavirus outbreak, or COVID-19 pandemic, recorded to SoCalGas’s Catastrophic Event  
7 Memorandum Account (CEMA) as well as SoCalGas’s response to the event. The factual  
8 background of and SoCalGas’s response to the wildfire and storm events, or the non-COVID-19  
9 CEMA events, is provided separately in the prepared testimony of Larry Andrews (Chapter 1).  
10 Further, the associated costs and routine accounting procedures of all CEMA events included in  
11 this application are provided in the prepared testimony of Leslie Hayles (Chapter 3).

12   **II.      COVID-19 PANDEMIC**

13           **A.      Event Background**

14           COVID-19’s impact on California and those in SoCalGas’s territory was severe. In late  
15 2019, the novel coronavirus, which had not yet been named COVID-19,<sup>1</sup> was first reported in  
16 Wuhan, China, and eventually spread globally affecting several million people. According to the  
17 Centers for Disease Control and Prevention (CDC), the first travel-related case of COVID-19  
18 was confirmed in the State of Washington on January 21, 2020.<sup>2</sup> The Director-General of the  
19 World Health Organization (WHO), on January 30, 2020, declared the outbreak a Public Health  
20 Emergency of International Concern, the WHO’s highest level of alarm.<sup>3</sup> In response to the

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1   <sup>1</sup> “COVID-19” was announced as the official name by the World Health Organization on February 11, 2020. See: [https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/naming-the-coronavirus-disease-\(covid-2019\)-and-the-virus-that-causes-it#:~:text=WHO%20announced%20%E2%80%9C%20COVID%2019%E2%80%9D,the%20United%20Nations%20\(FAO\).](https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/naming-the-coronavirus-disease-(covid-2019)-and-the-virus-that-causes-it#:~:text=WHO%20announced%20%E2%80%9C%20COVID%2019%E2%80%9D,the%20United%20Nations%20(FAO).)

2   <sup>2</sup> CDC Newsroom, “First Travel-related Case of 2019 Novel Coronavirus Detected in United States” (January 21, 2020). Available at: <https://www.cdc.gov/media/releases/2020/p0121-novel-coronavirus-travel-case.html>.

3   <sup>3</sup> World Health Organization, “Timeline: WHO’s COVID-19 response”. Available at: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/interactive-timeline#category-Leadership>.

1 outbreak, and continuously as the situation evolved, the local, state, and federal governments  
2 issued several governmental orders to protect citizens and attempt to slow the spread of the virus.

### 3 **B. Governmental Orders**

4 On March 4, 2020, the Governor of the State of California, Governor Newsom,  
5 proclaimed a State of Emergency in California in response to the outbreak of COVID-19.<sup>4</sup> On  
6 March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal  
7 response to the emerging COVID-19 pandemic. On March 19, 2020, Governor Newsom issued  
8 Executive Order N-33-20, or the California Stay Home Order, ordering residents to stay home or  
9 at their place of residence.<sup>5</sup> Also effective March 19, 2020, the City of Los Angeles initiated its  
10 Safer at Home Order for Control of COVID-19 (Safer at Home Order), closing businesses and  
11 restricting public gatherings.<sup>6</sup> Prior to that, an order from the Orange County Health Officer,  
12 issued on March 17, 2020, followed by a County Health Officer's Order on March 18, stated that  
13 businesses should follow social distancing guidelines issued by the California Department of  
14 Public Health (CDPH). The orders prohibited public and private gatherings except for certain  
15 exceptions, such as essential businesses. Utilities providing essential services were considered  
16 exempt. Riverside County issued a notice on April 4, 2020, ordering everyone to wear face  
17 coverings when leaving their home, including essential workers. Other city and county  
18 ordinances followed (including, but not limited to, Ventura County, County of San Bernardino,  
19 City of Santa Monica, Lancaster, etc.) and have since been extended or amended. The Safer at  
20 Home Order was extended until May 15<sup>7</sup> and then further modified as the State transitioned to  
21 reopening certain lower risk businesses.

22 In April 2020, Governor Newsom outlined indicators that the state would consider for  
23 gradual reopening (Stage 2) as of May 8 (see Executive Order N-60-20). On June 12, 2020, the

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<sup>4</sup> Office of Governor Gavin Newsom, "Governor Newsom Declares State of Emergency to Help State Prepare for Broader Spread of COVID-19" (March 4, 2020). *Available at:* <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>5</sup> Executive Department State of California, Executive Order N-33-20 (March 19, 2020). *Available at:* <https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>.

<sup>6</sup> *See:* [https://file.lacounty.gov/SDSInter/lac/1070029\\_COVID-19\\_SaferAtHome\\_HealthOfficerOrder\\_20200319\\_Signed.pdf](https://file.lacounty.gov/SDSInter/lac/1070029_COVID-19_SaferAtHome_HealthOfficerOrder_20200319_Signed.pdf).

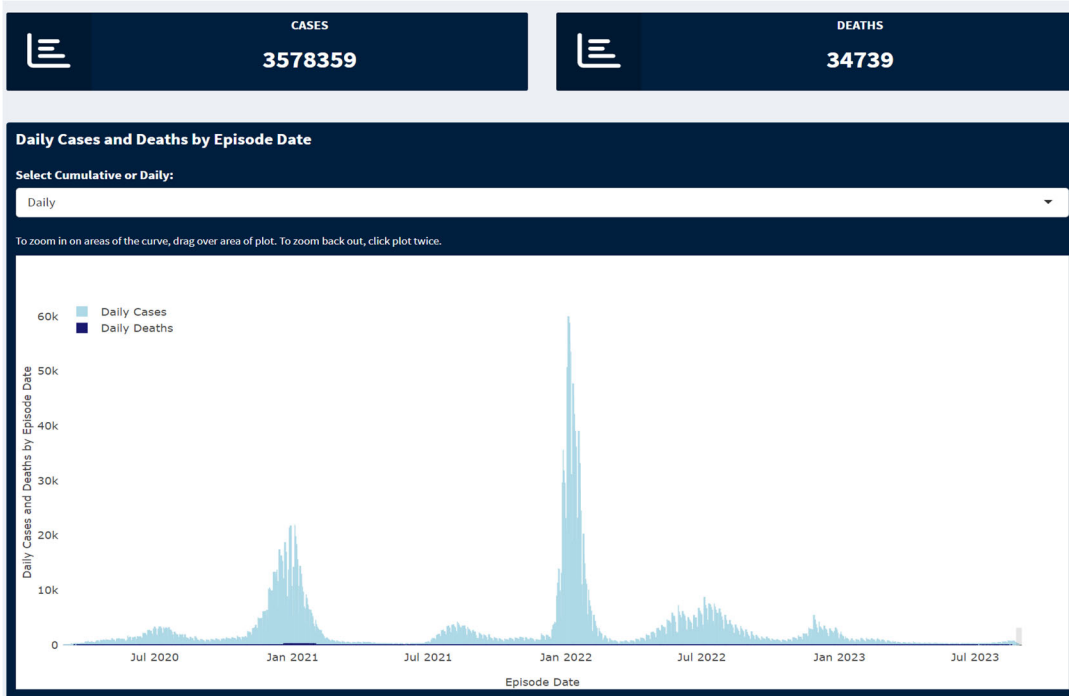
<sup>7</sup> *See:* [https://covid19.lacounty.gov/wp-content/uploads/HOO\\_Safer-at-Home-Order-for-Control-of-COVID\\_04102020.pdf](https://covid19.lacounty.gov/wp-content/uploads/HOO_Safer-at-Home-Order-for-Control-of-COVID_04102020.pdf).

1 gradual re-opening of higher risk business and venues began. On June 18, 2020, the CDPH  
2 issued guidance on the use of face coverings, requiring face coverings for the public and workers  
3 where there is high risk of exposure. On July 13, 2020, Governor Newsom announced  
4 modifications to Stage 3 reopening protocols, closing select indoor activities.

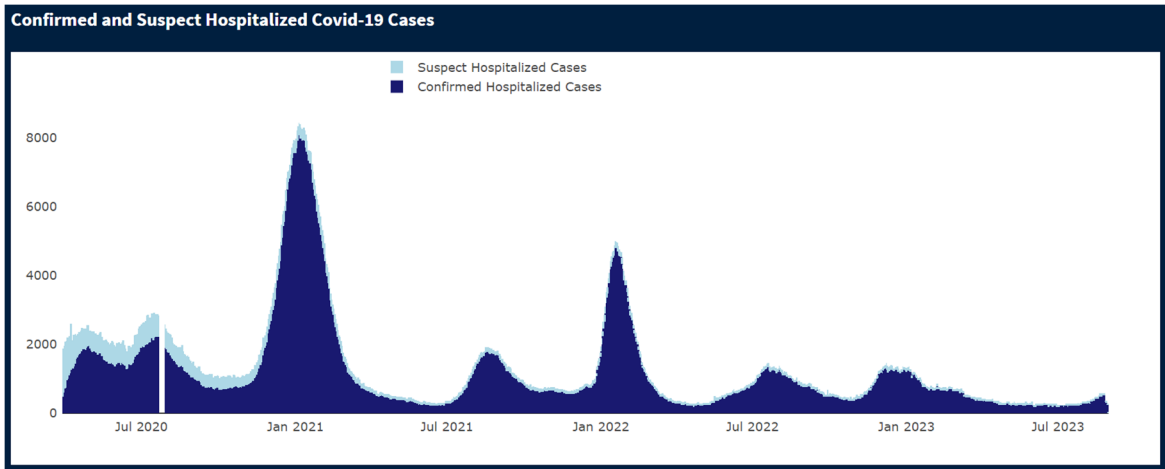
5 On February 28, 2023, Governor Newsom issued a proclamation marking the end of  
6 California’s COVID-19 State of Emergency, transitioning the State to the SMARTER plan,  
7 focused on shots, masks, awareness, testing, education, and treatment.

### 8 C. COVID-19 Cases in SoCalGas’s Territory

9 SoCalGas provides service in 12 counties (220 incorporated cities and roughly the same  
10 number of unincorporated cities) in Southern California. Since the beginning of the pandemic,  
11 there have been approximately 3.5 million reported cases of COVID-19 and over 34,000 deaths  
12 in Los Angeles County. The chart below, from the Los Angeles Public Health Department,  
13 shows the varied impact of cases since 2020. Each peak was often precipitated by new local,  
14 state, and federal safety mandates and orders.



1 At various times, hospitalization rates, an indicator of the seriousness of the epidemic,  
2 continued to experience intermittent and unpredictable highs, which made responding to the  
3 pandemic challenging for SoCalGas.



4  
5 SoCalGas’s employees felt the impact of COVID-19, either having tested positive or  
6 through exposure. The Employee Care Services (ECS) department, which administers all leave  
7 and absence programs at SoCalGas, developed a COVID-19 response team, adding new  
8 contractors who were trained to conduct employee intakes for employees who had tested  
9 positive, been exposed, or had COVID-19 symptoms. As of September 30, 2023, ECS has  
10 conducted 18,257 employee intakes. SoCalGas has had 5,610 confirmed positive cases which  
11 were processed through the ECS team and provided paid time off (as was true for those reporting  
12 only COVID-19 symptoms or exposure for most of the pandemic). All the positive cases  
13 required contact tracing, and many resulted in other employees or contractors being quarantined.

14 **D. SoCalGas’s Response to COVID-19**

15 SoCalGas undertook a series of precautionary measures to protect the health, safety, and  
16 well-being of its employees, contractors, and customers in the communities it serves during the  
17 COVID-19 pandemic based on current public health guidance and regulations at the time which  
18 continually evolved over the course of the pandemic. In early 2020, when reports began to  
19 surface about COVID-19 cases in various parts of the world, SoCalGas began monitoring and  
20 collecting whatever data and science it could in the event the pandemic affected Southern  
21 California. On February 26, 2020, Randy Clark, Sempra’s Chief Human Resources Officer,  
22 emailed all employees enterprise-wide explaining, “While the coronavirus has now spread to 41  
23 locations internationally, the immediate health risk for the general American public, who are

1 unlikely to be exposed to the virus at this time, is considered low. Still, the virus remains an  
2 international health concern with global efforts focused on mitigating the impact of the virus and  
3 containing the spread.”

4           However, as we now know, events moved fast. By February 28, 2020, SoCalGas’s  
5 Emergency Management (EM) team began partnering with various internal and external  
6 stakeholders and directing departments to review their Business Resumption Plans in the event  
7 of service disruptions. The same day, SoCalGas’s Safety Department issued a Safety and Health  
8 Bulletin to all employees with information on respirators should employees request them. Soon  
9 thereafter, travel restrictions were put in place for certain international travel, quarantine rules  
10 were adopted, internal safety and wellness resource sites were created and updated almost daily,  
11 and SoCalGas’s first live employee education program, in partnership with the Los Angeles  
12 County Department of Public Health, was held on March 10, 2020. The first employee  
13 quarantine due to possible exposure began on March 10, 2020.

14           Effective March 16, 2020, SoCalGas required employees who could work remotely to  
15 remain at home through March 31, 2020, an order that was continually extended for close to half  
16 of SoCalGas’s workforce through April 2022. For SoCalGas’s frontline employees, dozens of  
17 protocols were created and policies amended to allow SoCalGas to safely continue servicing its  
18 customers.

19           On March 17, 2020, SoCalGas notified the Commission’s Executive Director by letter  
20 that it had invoked its CEMA for the COVID-19 pandemic, effective March 4, 2020, to record  
21 expenses it incurred to comply with state and federal governmental orders relating to the  
22 pandemic affecting California within and outside of SoCalGas’s service territory. Upon  
23 submitting the letter, SoCalGas was authorized to record incremental costs incurred in its CEMA  
24 – 2020 COVID-19 Subaccount. A copy of the March 17, 2020, CEMA letter is attached to this  
25 testimony as Exhibit 2-1.

26           Over the ensuing months, an Incident Command System (ICS) – a team comprised of  
27 leaders from Human Resources, Operations, Safety, Communications, and other functional areas  
28 – met regularly (daily in the beginning) to navigate the news reports, government regulations,  
29 and science, all with the goal of keeping our employees, customers, and the public safe while  
30 maintaining service. Weeks turned into months and into years, with the ongoing development of  
31 a host of safety protocols, the creation of human resources benefits and policies tailored to

1 COVID-19, sorting through the novel world of remote work, and creating new communication  
2 channels to keep employees informed and connected.

3 **1. O&M Activities**

4 **a. Employee and Customer Communications**

5 SoCalGas took a variety of measures to appropriately communicate to employees and  
6 customers about the procedures and policy changes as a result of the COVID-19 pandemic.  
7 Various forms of employee communications included production of a series of videos from our  
8 executives to provide ongoing updates of how the company was responding to COVID-19, a  
9 video to explain changes being made at company facilities to keep employees safe, signage at  
10 facilities, fleet vehicles, construction sites throughout our service territory reminding employees  
11 of current policies and procedures, and stickers for company vehicles that provided COVID-19  
12 protocol reminders. Signage regarding critical worker prevention measures and essential  
13 infrastructure guidance were communicated, including maintaining social distancing, wearing  
14 face coverings, avoiding contact with your face, covering your cough and sneeze, avoiding  
15 physical contact, washing your hands frequently, cleaning frequently, and disinfecting  
16 frequently, as well as staying at home when ill.

17 Additionally, a video series was created to highlight local doctors at hospitals throughout  
18 our service territory providing first-hand accounts of what it was like to treat patients with the  
19 virus. This video series also emphasized the importance of getting the COVID-19 vaccination.  
20 Procurement of COVID-19-related images for use on company signage and in employee  
21 communications was secured through Getty.

22 In addition to keeping SoCalGas employees aware of the evolving COVID-19 protocols  
23 and policies, SoCalGas provided communications to customers and stakeholders on a number of  
24 customer service protocols, programs, and protections that included 1) safety procedures for  
25 customer services field visits, 2) uninterrupted natural gas service information, 3) billing and  
26 payment support, and 4) assistance programs awareness and information. The customer and  
27 stakeholder communications provided important information through various channels and in  
28 several languages. These communication channels included emails regarding monthly COVID-  
29 19 stakeholder newsletters, customer service protocols and policy updates, website updates  
30 including customer assistance programs, available protections, service protocols, and safety.  
31 Social media channels and radio were also utilized to provide customers and our community the



1 latest updates on the evolving situation and important information regarding their natural gas  
2 service overall.

3 **b. Fleet/Trailer Rentals**

4 In response to COVID-19, SoCalGas evaluated workforce, health, and safety needs,  
5 including implementing social-distancing practices at facilities and in fleet vehicles. In March  
6 2020, SoCalGas consulted with an epidemiologist who advised that it is safe for a 2-person crew  
7 to continue traveling in the same vehicle as long as the employees continue to practice proper  
8 personal hygiene including washing hands, using hand sanitizer, and maintaining a clean vehicle.  
9 During this time, SoCalGas worked to keep crew assignments fixed, further limiting potential  
10 employee exposure.

11 As the COVID-19 situation continued to evolve and with the understanding that COVID-  
12 19 is transmitted by airborne methods, research and guidance was changing towards increasing  
13 distancing and reducing exposure time. SoCalGas determined in April 2020 it would take  
14 additional precautionary measures to require only one employee per vehicle, including all crew  
15 members. If a company vehicle was not available, supervisors would request rental vehicles from  
16 Fleet Services, who, in a joint effort with Supply Management, negotiated a temporary 20%  
17 discount with Avis starting in April 2020 for all vehicles rented in support of COVID-19.  
18 Vehicle fuel cards were issued with rental vehicles. Pre-COVID-19 policy stated that temporary  
19 fuel cards were only available for rental vehicles used for longer term use (two months or more)  
20 if the vehicle cannot be fueled at a company location. Given the COVID-19 situation, as an  
21 exception, fuel cards were being provided for those additional rental needs for one month or  
22 more. If neither company vehicle nor rental car options were available, use of a personal vehicle  
23 was permitted with submittal of mileage for reimbursement. Cleaning materials are available at  
24 each company location for employees to clean their vehicles.

25 **c. Facilities and Vehicle Enhanced Cleaning**

26 In March 2020, Facilities initiated a tiered response cleaning for the mitigation of  
27 COVID-19 at 116 SoCalGas locations and impacted fleet vehicles. Preventative and response  
28 measures were taken and aligned with COVID-19 facility guidance from Cal/OSHA, U.S.  
29 Department of Health and Human Services, and the CDC. SoCalGas's process followed a

1 continuous cycle and was regularly monitored to determine if changes in approach would be  
2 necessary or appropriate.

3 **i. Facilities**

4 Any facility where employees and others are present, including customer-facing branch  
5 offices, followed the recommended health and safety protocols required for occupancy. In  
6 consultation with medical and facility experts, SoCalGas designed and implemented worksite  
7 requirements to meet those temporary standards.

8 Facility enhanced cleaning varied in scope depending on the tiered response to the  
9 cleaning notifications. This cleaning consisted of disinfection of the following surfaces in our  
10 administration buildings:

- 11 • Handles and knobs for interior and exterior doors
- 12 • Galleys and breakroom table and counter tops, microwaves, water dispensers,  
13 vending machines, refrigerator handles
- 14 • All trash receptacles and faucets
- 15 • Restroom facilities including counters, sinks, and toilets
- 16 • Building light switches, elevator call buttons, copier machines, and other office  
17 machines
- 18 • Conference Rooms and assembly room tables
- 19 • Wipe down of workstations included desktops, files, overheads, drawers,  
20 computer keyboards, mice/trackball, phones, and monitors
- 21 • Drawers and handles, chair arms and armrest
- 22 • HEPA vacuumed carpeted floors and mopped hard surfaces
- 23 • Walls and windows

24 The following products, based on availability, were also provided by Facilities and were  
25 approved by Safety & Health for employee usage for cleaning of their personal workspace (e.g.,  
26 desktops, chair armrests, phones, monitors, keyboards, mice) as needed: HandyClean sterile  
27 wipes from Diamond Wipes, Clorox Disinfectant Wipes, and Lysol Disinfecting Wipes.

28 **ii. Fleet**

29 Vehicle cleaning protocols were established and utilized according to the fluid CDC  
30 information provided. Vehicle enhanced cleanings were conducted by janitorial vendors using

1 cleaning products identified on the list of EPA-registered disinfectants that have qualified for use  
2 against COVID-19. The process included a pre-cleaning treatment to remove surface dirt  
3 (utilizing a soap and water solution) prior to applying an EPA-registered disinfectant. The label  
4 directions of the disinfectant were followed that relate to the specified contact time needed. All  
5 potentially contaminated surfaces were to be cleaned using a microfiber cloth or equivalent. This  
6 would include door handles, steering wheels, shift levers, buttons or touch screens, wiper and  
7 turn signal stalks, passenger and driver door armrests, grab handles, seat adjusters, fronts and  
8 backs of seats, and all interior glass (side windows, windshields, rear windows, rearview mirrors,  
9 and sun visors).

10 **d. Cal/OSHA Testing**

11 In response to the COVID-19 Prevention - Emergency Temporary Standards (ETS)  
12 issued by the California Occupational Safety & Health Administration (Cal/OSHA)<sup>8</sup> on  
13 November 30, 2020, SoCalGas began a process to comply with the requirements regarding  
14 COVID-19 outbreaks and major outbreaks. A non-emergency version of this Cal/OSHA  
15 regulation will remain in effect through February 3, 2025.

16 The regulation defines the criteria for a COVID-19 Outbreak, but California Department  
17 of Public Health (CDPH) Guidance takes precedence if the definition differs. CDPH currently  
18 defines an Outbreak as 3 or more cases in an exposed group within a 7-day period: Cal/OSHA  
19 defines a Major COVID-19 Outbreak as 20 or more cases in an exposed group within a 30-day  
20 period. A COVID-19 Outbreak requires COVID-19 testing initially and again the next week,  
21 then weekly for the duration of the outbreak for employees in the exposed group. A Major  
22 COVID-19 Outbreak requires COVID-19 testing twice a week. Testing during Outbreaks and  
23 Major Outbreaks continues until there are one or fewer new cases for 14 days for employees in  
24 the exposed group. Testing is provided at no cost to employees and during regular working  
25 hours for those who remain in the workplace.

26 On-site testing for employees involved in either an outbreak or a major outbreak is  
27 performed by two medical consulting companies. SoCalGas supervisors and the Facilities

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<sup>8</sup> State of California Department of Industrial Relations, “COVID-19 Prevention Emergency Temporary Standards – Fact Sheets, Model Written Program, and Other Resources” (Updated February 2023). Available at: <https://www.dir.ca.gov/dosh/coronavirus/ETS.html>.

1 department prepare the location for testing. Employees are notified of the testing day and times,  
2 then may present themselves for a COVID-19 test. The medical consultant conducts the test, and  
3 the employee waits for the results. Those with negative test results report back to their  
4 workstation. Employees with positive tests are sent home with instructions to follow from  
5 SoCalGas ECS for their return-to-work requirements.

6 From December 2020 to date, there have been 118 outbreaks declared at company  
7 facilities, two of which met the criteria for major outbreaks. Each outbreak had a minimum of  
8 two days to provide antigen testing, but many outbreaks continued for several weeks. During  
9 testing, 4,622 antigen tests were administered, and 74 positive cases were identified.

10 **e. Telecommuting Work Equipment**

11 To reduce the risk of COVID-19 transmission in the workplace, SoCalGas established a  
12 new Work from Home (WFH) policy and companion resources. Employees were offered  
13 reimbursement for home office supplies and a remote-work stipend to cover home expenses  
14 incurred to facilitate WFH (discussed separately below). Increased access to and use of  
15 technologies was implemented, such as virtual conferencing, cloud-based file sharing, and  
16 remote access to secure systems and databases. These policies, resources, and technologies were  
17 necessary and implemented to support WFH which enabled compliance with the various public  
18 health orders (described above) to reduce the risk of employees contributing to the spread of  
19 infections. For example, SoCalGas incurred telecommuting expenses related to cable, internet,  
20 and other home-base expenses for employees who were required to work at home in order to  
21 safely comply with the California Stay Home Order and other COVID-19 distancing and safety  
22 directives.

23 Due to the California Stay Home Order, SoCalGas established Remote Work Equipment  
24 Purchasing Guidelines in March 2020, subsequently updated in June 2020, for employees who  
25 required additional home-office equipment while working remotely in response to the COVID-  
26 19 situation. The company decided to reimburse employees up to \$400 to purchase certain  
27 equipment to perform their duties remotely. The approved equipment included keyboard,  
28 monitor, monitor stand, mouse, back/foot support, wrist rest pads, and a company-approved  
29 ergonomic chair. All remote work equipment purchases had to be reviewed and approved by the  
30 supervisor. Other office furniture, such as a desk, was not covered in this guideline except for a

1 company-approved ergonomic chair. The equipment purchased for home use will remain with  
2 the employee and not be retrieved by SoCalGas upon physical return to work.

3 SoCalGas’s Logistics department reviewed prices on Amazon in late March 2020, which  
4 provided a variety of options for certain office items, such as office chairs, monitors, dual  
5 monitor stands, and printers for less than \$100 up to \$200 for each item. Also, SoCalGas  
6 examined a potential Amazon Business agreement to provide credits, as well as removing some  
7 restrictions that applied to its Staples catalog to allow access to certain products. SoCalGas  
8 ultimately determined that the best option was to provide employees with more flexibility in  
9 selecting home office products (from the approved equipment mentioned above) and retailers to  
10 purchase from as long as it aligned with Sempra and SoCalGas policies.

11 **f. Employee Stipend – Remote Work**

12 Effective March 16, 2020, SoCalGas advised approximately 3,400 employees, excluding  
13 essential employees required to work onsite, to work remotely until March 31, which was  
14 subsequently extended to April 30, May 31, and September 7. This policy was eventually  
15 extended through March 2022. SoCalGas continued to focus on safety as the COVID-19  
16 situation evolved throughout 2022 and 2023 and continues to apply its WFH policy which,  
17 among other aspects, requires employees to remain out of a work location if they are  
18 experiencing COVID-like symptoms.

19 SoCalGas had an obligation under California law to reimburse employees for necessary  
20 business expenses incurred as a direct consequence of their duties. In accordance with California  
21 Labor Code Section 2802, an employee is entitled to be reimbursed by his or her employer for  
22 “necessary expenditures or losses incurred by the employee in direct consequence of the  
23 discharge of his or her duties, or of his or her obedience to the directions of the employer.” An  
24 internet connection at home represented such an expenditure while teleworking because without  
25 internet service, employees would not have been able to perform their jobs. This would have  
26 negatively impacted SoCalGas’s ability to adequately serve its customers.

27 The WFH policy provides a monthly stipend of \$25 for employees who work remotely as  
28 reimbursement for home business-related expenses (such as home internet or other related home-  
29 based costs. The \$25 figure was an approximation deemed sufficient to cover the basic cost of

1 home internet in most instances, with an exception process if an employee had other identified  
2 necessary business expenses.

3 **g. Temperature Health Screening/Medical Services**

4 SoCalGas examined guidelines from the CDC, as well as other state, city, and county  
5 guidelines throughout the event. The CDPH issued guidelines on March 27, 2020, for essential  
6 personnel providing critical in-home services, which addressed the following topics: health  
7 screening, facemasks, gloves, hand hygiene, and self-monitoring, etc. In May 2020, the CDC  
8 issued interim guidance for employers to resume business.<sup>9</sup> The guidance included a  
9 consideration for conducting daily in-person or virtual health checks. On May 7, 2020,  
10 Cal/OSHA and the CDPH released a set of industry-specific guidelines for energy and utilities.  
11 The document references individual control measures and screening, noting that employers  
12 provide “temperature and/or symptom screenings for all workers at the beginning of their shift  
13 and any personnel entering the facility.”<sup>10</sup>

14 On March 24, 2020, SoCalGas identified critical sites that were chosen based on  
15 operational business need and emergency customer support. The following locations were  
16 selected as critical sites: SoCalGas’s primary and secondary Gas Control operations facilities,  
17 Redlands, San Dimas, and Monterey Park.

18 On March 27, 2020, SoCalGas initiated temperature and health screenings for all entrants  
19 of the sites identified as critical sites on March 24, 2020. Screenings were performed by medical  
20 professionals (i.e., Occupational Health Nurses, Emergency Medical Technicians (EMT),  
21 medically trained technicians). During the screening, trained medical professionals conducted  
22 temperature checks and reviewed the three COVID-19 screening questions with each entrant, as  
23 discussed below. In the initial stages of SoCalGas’s COVID-19 response, resources that were  
24 trained and able to administer onsite temperature and health screenings were scarce. To resolve  
25 this issue, SoCalGas amended its contract with a contractor already onsite providing nursing

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<sup>9</sup> Centers for Disease Control and Prevention, “Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19)” (March 8, 2021). Available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html#more-changes>.

<sup>10</sup> California Department of Public Health, “COVID-19 Industry Guidance: Energy and Utilities” (July 29, 2020). Available at: <https://files.covid19.ca.gov/pdf/guidance-energy.pdf>.

1 services at these facilities. The contractor was able to quickly provide qualified personnel to  
2 administer screenings at each of the identified critical sites.

3 On May 15, 2020, temperature and health screenings were expanded to the following  
4 critical sites: Anaheim Regional Headquarters, Energy Resource Center, San Bernardino Base,  
5 and Pico Rivera.

6 Also on May 15, 2020, temperature and health screenings were expanded to several  
7 Transmission and Storage critical sites that were identified as essential to business operations.  
8 The following locations were selected as Transmission and Storage critical sites: Blythe  
9 Compressor Station, Moreno Compressor Station, South Needles Compressor Station, Playa del  
10 Rey Storage Facility, Aliso Canyon Storage Facility, Honor Rancho Storage Facility, and Goleta  
11 Storage Facility.

12 The Transmission and Storage critical sites required a qualified contractor that was able  
13 to quickly secure scarce medically trained resources to perform screenings onsite. SoCalGas  
14 personnel identified a contractor who had previously supported SoCalGas facilities as a  
15 subcontractor in a standby/rescue EMT role. The contractor was approved as a qualified  
16 contractor and provided medically trained resources that were able to administer temperature and  
17 health screenings onsite 24/7 at Transmission and Storage critical sites.

18 To comply with state and federal COVID-19 mandates, all temperature and health  
19 screenings were performed according to CDC physical distancing and hygiene guidelines. Signs  
20 were placed at the entrance of each facility to identify the location of the Temperature and Health  
21 Screening station. At the station, each entrant was required to answer three COVID-19 screening  
22 questions, which addressed COVID-19 diagnoses, symptoms, and exposure. Screeners followed  
23 a protocol that complied with COVID-19 safety measures. Employees were required to report to  
24 the screener wearing a face covering and to follow physical distancing guidelines at all times.  
25 Screeners administered temperature screenings using no-touch (head) infrared thermometers.  
26 Entrants who registered a temperature as less than 100.4° and answered all screening questions  
27 as “no”, could enter the building. Entrants who registered a temperature higher than 100.4°,  
28 answered “yes” to any of the health screening questions, and those who refused to be screened,  
29 were not allowed to enter the facility. An internal document outlining the protocols for

1 temperature and health screening at critical sites was developed on March 27, 2020, and further  
2 refined on May 15, 2020.

3 Hourly employees who waited to be screened were paid for their wait time. Entrants who  
4 were not allowed to enter the building based on their temperature or health screening responses  
5 were sent home.

6 SoCalGas implemented a multiphase approach to temperature and health screenings:

- 7 • Phase 1, beginning on March 27, 2020, consisted of the administration of  
8 screenings 24/7 at critical sites.
- 9 • Phase 2 was initiated on June 10, 2020, at sites where screenings were  
10 administered (all critical sites identified except for those listed as Transmission  
11 and Storage critical sites). This phase focused on adjusting the period for  
12 screenings to a 12-hour period Monday through Friday, which covered  
13 approximately 80-90% of all entrants into the site.
- 14 • Phase 3, initiated on July 1, 2020, focused on adjusting the period of screenings at  
15 Transmission and Storage critical sites.

16 On May 26, 2020, the ICS team discussed a contract amendment to reduce costs and  
17 hours for support provided by contractors. Modified schedules of contract support for critical  
18 sites were developed. On June 19, 2020, one contract was amended to reflect the new negotiated  
19 rates and services effective June 4, 2020, through May 1, 2021. The contract with the other  
20 contractor was renegotiated in June-July 2020 and new schedules for Transmission and Storage  
21 critical sites were developed.

22 From March 27, 2020, to June 15, 2020 (the end of Phase 1), temperature and health  
23 screenings expanded to 16 critical sites with over 91,000 screenings conducted. Screeners  
24 averaged 2,500 temperature screenings per day. During this period, approximately 21 employees  
25 and five visitors/contractors were sent home during the screening process.<sup>11</sup>

26 The CDC encouraged individuals planning to enter the workplace to self-screen prior to  
27 coming onsite. SoCalGas was focused on building a culture of self-screening through employee  
28 enablement and technology. In June 2020, ICS approved providing care kits. Each kit contained

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<sup>11</sup> Centers for Disease Control and Prevention (CDC), “General Business Frequently Asked Questions” (May 24, 2021). Available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html>.



1 hand sanitizer, face coverings, wipes, a self-screening questionnaire, a letter from SoCalGas  
2 Leadership, and a digital thermometer. Providing care kits to employees, distributed July-August  
3 2020, enabled them to perform self-screenings at home before going to the workplace.

4 Care kits were distributed in two groups: On July 2, 2020, 700 care kits were distributed  
5 to the first group, and in August 2020, 9,000 care kits were distributed to the second group. The  
6 contractor responsible for organizing care kits for employees printed 10,600 letters/cards for both  
7 groups and assembled and delivered 700 kits for the first group. The care kits were sent to 59  
8 SoCalGas locations for distribution to employees and contractors.

9 SoCalGas used an attestation application, described below, consisting of three COVID-19  
10 screening questions (which addressed COVID-19 diagnoses, symptoms, and exposure) as a  
11 health assessment. This technology-driven health assessment was taken by employees and some  
12 non-employees prior to entering any SoCalGas facility. As employees transitioned to using care  
13 kits and technology to perform their own COVID-19 self-screenings, SoCalGas decreased the  
14 duration and number of contractors performing screenings at facilities.

15 In May 2020, the cost and benefit of several alternative implementations of temperature  
16 and health screenings were reviewed. The ICS team estimated the cost for the continuation of  
17 third-party 24/7 support at facilities to be \$18M. A second alternative estimated reduced  
18 services (12-hour M-F) to be \$9M. Other alternatives that were less costly included third-party  
19 assistance with company purchased equipment (\$2.3-4.8M), company purchased equipment  
20 (\$64-240K), and self-screening (\$120-440K). In April-May 2020, several temperature screening  
21 technologies were analyzed as a means of providing contactless temperature screenings.  
22 SoCalGas reviewed the following products: Seek Scan, Flir (E-75), VarioCAM, American  
23 Dynamics Illustra EST, and the Meridian Pedestal. SoCalGas identified several features that are  
24 key to finding a solution that would fit its needs: contactless accurate skin temperature  
25 measurements, customizable alerts for specified temperatures, ownership of biometric  
26 information, location of manufacture, and avoidance of untested potentially malicious devices  
27 that could compromise the internal network.

28 On May 1, 2020, SoCalGas determined that the Meridian Pedestals had the potential to  
29 support temperature screenings onsite and purchased two pedestals at a cost of \$5,000 as a pilot  
30 for critical sites. These pedestals were subsequently returned due to a postponement of delivery  
31 and evolving information about the accuracy of the product. Thermal scanning was further

1 discussed as an option for temperature screenings; however, the decision was made to not pursue  
2 this technology due, in part, to the questionable accuracy of temperature screenings collected via  
3 thermal scanning.

4 SoCalGas's Operations Training department provides respiratory fit testing to employees  
5 on an annual basis. Due to COVID-related delays in the timeline and a looming deadline to  
6 perform testing in accordance with Cal/OSHA standards, SoCalGas required additional resources  
7 for make-up respirator fit testing for approximately 500 employees. This testing is required by  
8 Cal/OSHA to be performed in order to ensure the proper fit and function of respirators that are  
9 used to protect employees. A contractor already onsite was identified that could provide  
10 qualified resources to meet the needs of SoCalGas. Another contractor also did some respirator  
11 fit tests.

#### 12 **h. Recognition Pay to Frontline Workers**

13 In light of the California Stay Home Order, about half of SoCalGas's workforce worked  
14 remotely. The other half, approximately 4,000 management and union represented employees'  
15 jobs, required reporting to SoCalGas work locations, field locations, and customers' homes and  
16 businesses. SoCalGas determined that those essential management and union represented  
17 frontline employees who were not eligible to work remotely should be recognized.

#### 18 **i. Management Employee Recognition**

19 For employees performing essential services by reporting to a SoCalGas facility, job site,  
20 or customer site, SoCalGas leadership evaluated and approved COVID-19 recognition pay in the  
21 amount of \$1,500 per eligible onsite management employee. The bonus pay was not included  
22 for purposes of pension, cash balance, or 401(k) calculations. Important to this decision was the  
23 need to serve customers while keeping both employees and customers safe with the additional  
24 challenges of the COVID-19 virus.

25 This recognition was designed for management employees who could not work remotely  
26 and/or who regularly reported to a SoCalGas facility, job site, or customer site, and due to the  
27 COVID-19 pandemic were reporting to alternate work locations and/or adhering to new  
28 protocols and modified work standards. Some examples include having to work under new rules  
29 around the use of face coverings, masks and other personal protective equipment (PPE)  
30 requirements, health screening and temperature monitoring, additional procedures for in-home  
31 customer orders, new procedures for gas pipeline work performed in close proximity of other

1 employees and contractors, and others. For supervisors, SoCalGas also recognized the additional  
2 duty to communicate and manage employees in the proper use of new protocols, procedures,  
3 working conditions, and customer interactions, warranted special recognition.

4 **ii. Union Represented Employee Recognition**

5 For union represented employees performing essential services by reporting to a  
6 SoCalGas facility, job site, or customer site, SoCalGas leadership evaluated and approved  
7 COVID-19 recognition pay for union employees in the amount of 5% of the employee's hourly  
8 rate for all straight time hours worked. The 5% recognition premium was not applied to  
9 overtime, standby, or non-worked hours and was not included for purposes of pension, cash  
10 balance, or 401(k) calculations. Important to this decision was the need to serve customers while  
11 keeping both employees and customers safe with the additional challenges of the COVID-19  
12 virus.

13 SoCalGas's decision to pay this recognition was in light of the efforts of union  
14 represented employees who could not work remotely and, due to the COVID-19 pandemic, were  
15 then required to report to alternate work locations, learn new protocols, and/or adhere to  
16 modified work standards. Some examples include the use of face coverings, masks and other  
17 PPE requirements, health screening and temperature monitoring, additional procedures for in-  
18 home customer orders, new procedures for gas pipeline work performed in close proximity of  
19 other employees and contractors, and others.

20 **iii. Cost Considerations**

21 SoCalGas evaluated recognition plans, at a high level, at other California utilities and  
22 other industries, such as grocery stores and the medical field. The typical recognition  
23 opportunities for SoCalGas management employees are in the form of Spotlight Awards,  
24 Builders Awards, and Beacon Awards. There is no special bonus award for union represented  
25 employees as all payments and premiums are covered in the Collective Bargaining Agreement  
26 (CBA).

27 An overall analysis was done in conjunction with the COVID-19 recognition pay. The  
28 calculation for management and represented employees reporting to worksites considered  
29 options at 3, 5, 10% and ranged in estimated incremental cost of abouts \$812k - \$2.7 million per  
30 month, respectively. The period covered by the recognition pay was March 21, 2020, through

1 May 31, 2020, so straight-time hours worked for non-exempt employees during this period were  
2 used to calculate represented employee recognition awards.

3 Given that the management employees are salaried, SoCalGas decided not to pay the  
4 recognition as a percentage of salary, but rather as a flat amount to management employees in  
5 the form of a Builder's Award. After reviewing pay and typical Builder's Award amounts, the  
6 team decided to award a \$1,500 Builder's Award to all management employees working onsite  
7 or in the field regardless of part-time and full-time status.

8 The payment was made as one lump sum on the June 5, 2020, paychecks for all union  
9 represented and management employees.

10 **i. PPE and Supplies (Face Mask, Sanitizer, Etc.)**

11 In March 2020 (and in the following months), SoCalGas issued various safety and health  
12 bulletins regarding the use of face coverings and other safety-related supplies. For example, on  
13 April 4 (and updated effective on May 26), SoCalGas implemented additional protocols  
14 requiring face coverings while at company locations, with certain exceptions, and when engaging  
15 with customers and working in the field. SoCalGas examined guidelines from the CDC, as well  
16 as other city and county guidelines. The CDPH issued guidelines on March 27 for essential  
17 personnel providing critical in-home services, which addresses the following topics: health  
18 screening, facemasks, gloves, hand hygiene, and self-monitoring, etc. The County of Los  
19 Angeles Department of Public Health also issued social distancing guidelines for businesses and  
20 strategies for optimizing use of PPE.

21 ICS logistics examined PPE and supplies in March 2020 (and in the following months) to  
22 comply with the various federal, state, local, and agency mandates. Between March and April  
23 2020, SoCalGas procured and distributed additional supplies, such as masks, sanitizer, and nitrile  
24 gloves, through local vendors to all field/office employees not WFH. The goal was to procure  
25 enough inventory to sustain supplies for essential workers for approximately 12-18 months. As  
26 of late April 2020, SoCalGas procured over 2 million masks (combination of reusable, surgical,  
27 and KN95) sourced from 12 vendors. PPE and related supplies were tracked weekly to identify  
28 stock on-hand and the consumption rate in accordance with each company location, material  
29 group, category, etc. Logistics examined expected Customer Service Field (CSF) orders, Meter  
30 Set Assembly (MSA) inspections, and other onsite work, to determine what type of masks were  
31 needed or recommended, such as N95 masks for entered high-risk CSF orders, medical/surgical

1 masks for other CSF entered orders, and reusable cloth masks or face gaiters for other types of  
2 work.

3 Due to concerns regarding COVID-19 exposure, for customer service calls and required  
4 entries into customer facilities, SoCalGas personnel were required to ask screening questions to  
5 customers to assess potential COVID-19 exposure. If a customer responds affirmatively to any of  
6 the screening questions, the employee hazmat suit-up process was initiated. SoCalGas utilized an  
7 existing third-party contractor that SoCalGas has worked with before (e.g., for  
8 asbestos/lead/mold abatement work) to provide donning and doffing of hazmat suits that  
9 SoCalGas had acquired, as well as ensuring separate clean and contaminated areas and handling  
10 and disposal of waste specifically for COVID-19. Additionally, SoCalGas has Trained Observers  
11 if an instance occurs where the contractor is unavailable.

12 Due to limited supply of masks and other materials and a rapidly changing marketplace  
13 that did not necessarily allow sufficient time for SoCalGas's new vendor registration process,  
14 Logistics and Emergency Services also enacted the protocol for emergency use of Field Business  
15 (FB) Cards. Purchase limits of existing cardholders were increased through May 4, 2020, unless  
16 otherwise specified, and a number of new cards were issued for the Supply Management and  
17 Logistics and Support Services departments to temporarily permit spot ordering of larger  
18 quantities of supplies, including disinfectant wipes, sanitizer, and masks (e.g., reusable, surgical,  
19 KN95). Officer approval levels and material expenditures were temporarily modified as part of  
20 emergency card procedures. The cards along with any future approved changes during the  
21 emergency use period have been (or will be) closed upon notification by ICS and reverted to pre-  
22 incident state (e.g., card limits reverted to original amount and new cards cancelled). Regardless  
23 of the method used to procure the supplies, all transactions were reviewed in accordance with the  
24 applicable policies.

25 As of late April 2020, SoCalGas spent funding on masks and sanitizer sourced from 12  
26 vendors. Incremental general supply costs, hazmat suits, and COVID-19 related work with the  
27 contractor are included in this category.

#### 28 **j. Returning to the Workplace**

29 In May 2020, the CDC issued interim guidance for employers to resume business. The  
30 guidance outlined steps for employers to take to safely re-enter employees to the workplace. On  
31 May 7, 2020, Cal/OSHA and the CDPH released a set of industry-specific guidelines for energy

1 and utilities to ensure that safety measures were in place as employees return to work. The  
2 guidelines referenced protocols, plans and training that employers should put in place to reduce  
3 the risk of COVID-19 transmission in the workplace. In addition, California’s guidelines  
4 required that before re-opening, all facilities must:

- 5 • Perform a detailed risk assessment and create a site-specific protection plan.
- 6 • Put disinfection protocols in place.
- 7 • Train employees on how to limit the spread of COVID-19. This included how to screen  
8 themselves for symptoms and when to stay home.
- 9 • Set up individual control measures and screenings.
- 10 • Establish physical distancing guidelines.

11 SoCalGas followed CDC, Cal/OSHA, and the state of California guidelines for re-  
12 opening the workplace, making it a safe environment for employees to resume activities onsite.

13 **i. Risk Assessment, Site Plan, and Disinfection Protocols –**  
14 **Facilities**

15 SoCalGas took extensive precautions to make the workplace as safe as possible and align  
16 with COVID-19 facility guidance provided from the Cal/OSHA and the U.S. Department of  
17 Health and Human Services, as well as the CDC. Facilities where employees and others are  
18 present, including customer-facing branch offices, had to conform to the health and safety  
19 protocols required for occupancy. SoCalGas designed and implemented all that was required to  
20 prepare worksites to meet these goals.

21 Facility and site managers from SoCalGas sites were tasked with conducting  
22 comprehensive risk assessments to determine necessary changes to enhance the health and safety  
23 of our worksites. The risk assessments informed the site plans which were based on evolving  
24 guidance from local, state, and federal authorities. On June 1, 2020, a contractor was brought on  
25 to assist the Return to Workplace (RTWP) initiative including the development of facility risk  
26 assessments, comprehensive site plans, and enhanced floor plans. The contractor was chosen  
27 based on a competitive bidding process. On July 14, 2020, the site plan, including risk  
28 assessment and enhanced floor plans, for Simi Valley was approved by the ICS. This site plan

1 served as a template for other site plans for SoCalGas facilities. Site plans, required by local  
2 counties, were made available upon inspector request.

3 Janitorial services were expanded to maintain the required hygiene standards. In April  
4 2020 the Environmental Protection Agency (EPA) and CDC released guidelines and  
5 recommendations for cleaning and disinfecting infrastructure.<sup>12</sup> SoCalGas facility cleaning  
6 protocols were reviewed and adjusted to reflect the cleaning procedures outlined in the  
7 guidelines. On March 17, 2020, the ICS approved a three-tier approach to janitorial cleaning and  
8 disinfecting at SoCalGas facilities. Tier 1 or Tier 2 enhanced daily cleaning were performed  
9 regularly at most facilities, including bases and branch offices. If a confirmed case of COVID-19  
10 was linked to a facility, a Tier 3 cleaning in accordance with Janitorial Protocols for COVID-19  
11 was performed. This frequent and robust cleaning process accounted for the bulk of facilities  
12 related costs.

13 In March 2020, SoCalGas initiated janitorial COVID-19 sanitizing agreements with three  
14 contractors. For three years, the contractors were responsible for performing enhanced cleanings  
15 (Tier 1-3) at SoCalGas facilities (trailers, bases, and offices), including contingency for  
16 remediation services if needed.

17 Co-owned facilities, such as the Van Nuys Branch Office, also required enhanced  
18 janitorial cleanings. This facility is a shared site that is co-owned by the city of Los Angeles.  
19 SoCalGas covered the costs of additional cleaning for this site.

20 Heating, ventilation, and air conditioning (HVAC) systems were serviced and new filters  
21 with higher filtration levels were installed. New guidelines recommended replacing HVAC  
22 filters monthly which increased the frequency of filter replacement as prior to these guidelines  
23 HVAC filters were replaced every 90 days. Air circulation was also optimized to maximum  
24 capacity. A qualified HVAC specialist company was brought on to provide an annual inspections  
25 of HVAC systems and provide any necessary service to the systems at SoCalGas facilities.

26 An upgrade of air systems using bipolar ionization technology to neutralize viruses and  
27 other contaminants to provide the best possible quality was undertaken by the safety department.  
28 SoCalGas decided to perform a pilot of this technology in July-August 2020 at the San Dimas

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<sup>12</sup> EPA, “EPA, CDC Release Guidance for Cleaning and Disinfecting Spaces Where Americans Live, Work, and Play” (April 29, 2020). Available at: <https://www.epa.gov/newsreleases/epa-cdc-release-guidance-cleaning-and-disinfecting-spaces-where-americans-live-work>.

1 facility before expanding to other sites. A comparison of HVAC systems was performed to  
2 identify a system that would provide a low-cost, high-quality solution. Two manufacturers were  
3 reviewed to determine if their systems would meet the needs of SoCalGas. The preferred  
4 solution offered lower maintenance, energy, and installation costs along with a shorter lead time  
5 and was environmentally sound. A qualified HVAC specialist company was contracted to install  
6 the desired HVAC technology and an energy management system to monitor performance of the  
7 technology.

8 An industrial hygienist was contracted to perform indoor and outdoor air quality  
9 sampling in order to determine the level of ozone that the bipolar ionization system outputs. This  
10 was used to determine the success of the HVAC pilot. In September-October 2020, SoCalGas  
11 analyzed the air quality results which indicated there was no increase in ozone level after  
12 installation of the bipolar ionization system. These results supported that the use of bipolar  
13 ionization would not cause an employee safety concern.

14 On June 8 and June 12, 2020, RTWP signage to reinforce health and safety protocols was  
15 approved to be placed throughout facilities. Topics of the signs included: hygiene tips, washing  
16 your hands, physical distance, face mask requirements, acquiring safety supplies and sanitation  
17 stations. In June 2020, 206 signs reinforcing the various topics at Pico Rivera and Anaheim  
18 stations were installed.

19 Facility and site managers performed a comprehensive site assessment to identify areas to  
20 modify the floor plans of SoCalGas facilities. Workstation modifications varied by facility.  
21 Where appropriate, floor tape and signage were used to indicate one-way foot traffic. Conference  
22 rooms and workstations were modified for physical distancing. Plexiglass partitions were  
23 installed at branch offices at the end of July 2020 to maintain distances between the public and  
24 other employees. National Relocation Services of California (NRSCA) was contracted to supply,  
25 deliver, and install plexiglass partitions to separate employee workstations at SoCalGas facilities.  
26 Sanitation stations and additional safety supplies, including disposable face coverings, tissues,  
27 and hand sanitizer were made available to all entrants of facilities.

28 Training enhancements and adjustments to facilities were also made to ensure that  
29 training requirements were met. Due to instructors and employees wearing masks and practicing  
30 social distancing, it was difficult for the trainees at the SoCalGas Pico Rivera Training Center to  
31 hear and see the training at the facility. As a result, SoCalGas made a capital purchase of new



1 audio/visual equipment aimed at improving the audio and hearing of instructors and trainees. A  
2 contractor provided SoCalGas with both the materials and installation of the audio/visual  
3 equipment.

4 In 2021, SoCalGas implemented guard service at branch offices when they reopened to  
5 the public in order to provide crowd control, maintain social distancing guidelines, and limit the  
6 number of customers allowed in the lobby area. Contracts are managed by SoCalGas corporate  
7 security. Guard hourly rates were \$22-23 per hour for 3-8 hours per day at approximately 34  
8 offices.

9 **ii. Training and Communications**

10 SoCalGas collaborated closely with Sempra Corporate Compliance to roll out mandatory  
11 training courses to help employees limit the spread of COVID-19 and prepare themselves to  
12 work onsite and remotely. In addition, SoCalGas identified optional training courses to provide  
13 additional COVID-19 training and other courses available through SoCalGas University. An  
14 eLearning contractor provided a training bundle of two mandatory training modules  
15 (Successfully Navigating COVID-19 Workplace Changes and Working Effectively Through  
16 COVID-19). The cost for the training modules was covered by Sempra Corporate Compliance  
17 under Sempra’s existing contract with the eLearning contractor, since the training bundle was  
18 rolled out to various operating companies, not only SoCalGas. Training was tracked through  
19 SoCalGas’s Learning Management System (LMS).

20 Approximately 200 Transmission represented employees had no access to the online  
21 materials and required a downloadable PDF copy of the two mandatory training courses. This  
22 subset of employees was not assigned the training through LMS. Completion of the modules for  
23 these employees is documented through the completion of form 5300 and entered into LMS for  
24 tracking purposes.

25 **iii. Control Measures and Screenings**

26 An attestation was required of the daily process of confirming that employees conducted  
27 the self-screening process and also to attest to their fitness to enter a worksite or facility.  
28 Management and represented employees were required to download a newly developed  
29 Attestation application and were required to complete the daily attestation process. Individuals

1 who did not have the Attestation software tracked their daily self-screening and submitted a  
2 completed Form 5300 on a monthly basis.

3 In June 2020, SoCalGas began evaluating and comparing technologies that could be  
4 implemented to provide employees with a safe return to work. The desired technological solution  
5 would provide the following capabilities: attestation/wellness survey, social distancing, contact  
6 tracing, scheduling and shift optimization, the ability to push/pull information to/from the  
7 workforce, and a command-and-control center to create dashboards for situational awareness.  
8 Over 30 solutions from different companies were assessed based on cost implementation  
9 timeline, maintainability, scalability, automation, long term usage, multipurpose usage, the  
10 ability to track record information, and data security.

11 The technology solutions were narrowed down to three possible options: Pintr (for  
12 physical distancing, contact tracing, and communication), Archibus (for scheduling and shift  
13 optimization), and an in-house SoCalGas solution (for attestation/wellness surveys and command  
14 & control). The in-house solution for the attestation process was used in 2020 and 2021.

#### 15 **k. ECS COVID Case Management Team**

16 As a result of the need to address COVID-19 cases, whether positive, due to close  
17 contact, or those experiencing COVID-19 symptoms, SoCalGas's ECS team created a unit to  
18 handle COVID-19 cases. Due to the volume of employee cases (more than 16,000 requiring  
19 quarantine), the ECS team employed up to 10 contractors through Agile-1 to assist with  
20 employee telephone intakes, reviewing emails from employees, setting up leave benefits for  
21 affected employees, handling contact tracing, and returning those who could back to work. The  
22 total number of contractors varied during the pandemic due to the peaks and valleys necessitated  
23 by the COVID-19 spikes.

#### 24 **l. IT**

25 Pandemic-related tools enable employees to quickly assess the risk of potential COVID-  
26 19 exposures to other employees, facilities, vehicles, or customers. These tools reduce the time  
27 it takes staff to research and identify employee interactions, initiate appropriate follow-up, assist  
28 employees in managing and tracking COVID-19 related cases and interactions with employees to  
29 reduce the risk of exposure and enhance employee safety.

30 For instance, SoCalGas utilized a Pandemic Dashboard, a Mobile Application, and a  
31 Pandemic Analytics tool that provided SoCalGas's leadership with insight to the current

1 pandemic environment and identified trends to support real-time decision-making and policies.  
2 This dashboard tracks the impact of the pandemic within SoCalGas's service territory and in  
3 California, the U.S., and the world. At SoCalGas, the tools track the impact the pandemic is  
4 having on employees (e.g., where a COVID-19 outbreak site might exist or real-time data on the  
5 number of quarantined employees). SoCalGas's IT Department incurred increased costs for  
6 COVID-19 to maintain utility operations by implementing dashboards and mobile application, as  
7 well as purchasing computer and peripherals.

8 **m. Gas Control Sequestration**

9 Gas Control, which is a highly secure and controlled SoCalGas operations center,  
10 implemented necessary proactive steps to minimize COVID-19 exposure of personnel, including  
11 operating in a dual control room mode (splitting operators into two teams) since March 2020 to  
12 February 2023. Additionally, preventative measures were taken to limit personnel at the Gas  
13 Control operations facility to 2-3 employees for each shift, level 2 cleaning at each facility,  
14 health screening upon entry, providing sanitization supplies, and remote work for support staff.  
15 SoCalGas considered sequestration plans that are common in the industry as some utilities in  
16 other parts of the country were already implementing these protective measures. In order to  
17 perform critical business functions without interruption, Gas Control initiated sequestration to  
18 take place at the primary Gas Control operations facility for two-week period(s) starting April 8.  
19 All participants were selected as volunteers (two teams with five members each), for a two-week  
20 offsetting duration of up to three months (as needed).

21 Health measures (e.g., sanitized facility, restricted access, testing for COVID-19 prior to  
22 starting sequestration period, hygiene products provided) and other logistical needs (e.g., RVs for  
23 sleeping accommodations with electric/water service, cleanout service, showering facilities,  
24 food, laundry, etc.) were implemented. Ending sequestration depended on the COVID-19  
25 transmission rates and the success the region was experiencing in the State and local  
26 counties/cities' re-opening activities. There were not specific numerical triggers identified that  
27 determined the end of sequestration. Input from various sources was analyzed holistically to gain  
28 confidence that the control room could safely transition away from sequestration to an operating  
29 model where there was significant separation between crews. During sequestration, the Gas  
30 Control team had a couple of events where non-sequestration employees were quarantined at  
31 home due to potential third-party exposure. One event also involved the potential exposure to

1 two Control Room personnel. Sequestration was a necessary and effective safeguard to ensure  
2 continuous operation of this critical facility.

3 In light of the unique burdens being placed on Gas Control employees, a compensation  
4 plan was developed including a bonus for each two-week period and reimbursement for  
5 additional expenses incurred due to sequestration (e.g., not being able to be home with family  
6 and address home needs). Participants received their normal salary along with additional  
7 compensation for each two-week shift completed. The lump sum payment was subject to  
8 additional payroll tax withholding and was not included in Incentive Compensation Plan (ICP)  
9 calculations. In addition to COVID-related labor costs, the sequestration also involved non-labor  
10 costs such as trailers, laundry service, food, communication costs, and onsite COVID testing.

11 **n. Overtime Labor**

12 SoCalGas incurred overtime directly attributed to COVID-19 for the following reasons:  
13 (i) staffing shortages related to state-mandated COVID-19 absences (e.g., quarantine periods)  
14 which required other non-quarantined employees to work overtime, (ii) overtime related to  
15 participating in the incident response (e.g., attending incident command meetings or other  
16 situational awareness activities), (iii) logistics related to receipt and distribution of PPE, (iv) suit-  
17 up activities when entering homes where a customer had COVID-19, and (v) activities related to  
18 COVID-19 onsite testing (as mandated by California law).

19 **o. Mask Allowance**

20 The City of Los Angeles first closed businesses and restricted public gatherings effective  
21 March 19, 2020. Riverside County issued a notice on April 4, 2020, ordering everyone to wear  
22 face coverings when leaving the home, including essential workers. Other cities and counties  
23 implemented mandatory mask use requirements which impacted SoCalGas's workforce.  
24 Because masks were difficult to obtain at the time, the ICS logistics team conducted market  
25 research. Initially, the ICS team concluded there were enough mask supplies to accommodate  
26 compliance with current mandates for select cities, however some cities specified that certain  
27 masks (e.g., surgical grade) would be reserved for frontline medical workers and encouraged the  
28 public to use reusable/washable face masks. SoCalGas did not have enough inventory to allocate  
29 at least five cloth masks per employee and took a couple of weeks in early April to procure  
30 enough masks through local vendors and distribute to all field/office employees who entered  
31 SoCalGas facilities, customer's facilities, and/or interacted with the public. In preparation for

1 customer facing and essential field employees' requirements to comply with mandates and  
2 possible unknown level of supply from a system wide basis, SoCalGas decided to provide  
3 employees working onsite with a one-time \$50 allowance to purchase masks. This one-time  
4 stipend was paid to employees in April and May 2020. The rationale was to allow employees to  
5 have at least one mask per day for five days and, if they were reusable, they could be washed and  
6 reused. Research online for market prices showed a range of \$3-25 for face masks with varied  
7 availability. The ICS team determined that \$50 would be sufficient for these employees to obtain  
8 face coverings as needed (\$10 average cost for daily face covering at five days per week).  
9 Alternatives were considered (e.g., employees submit reimbursement with receipts, seeking  
10 donations from employees making homemade masks). However, from a logistics and  
11 administrative perspective, it was more straightforward to provide a one-time subsidy on  
12 identified employees' paychecks. Eligible employees were determined by receiving names of  
13 individuals from each of the operational directors. The total number of employees was  
14 approximately 5,000 at \$50 each.

15 **p. Payroll Taxes**

16 SoCalGas incurred incremental labor cost for work activities directly related to the  
17 COVID-19 pandemic. Some of these activities resulted in premium recognition pay and  
18 incremental overtime labor costs. The work associated with the incremental labor costs  
19 described in the testimony above resulted in incremental payroll tax. The incremental payroll tax  
20 cost is not included in the recorded labor costs but was consolidated and reported separately.  
21 The payroll tax rate used in this application is 7.6% and represents SoCalGas's required  
22 contributions to the Federal Insurance Contributions Act (FICA). The rate includes both the  
23 Social Security and Medicare portions of FICA. SoCalGas applied this payroll tax rate to the  
24 incremental labor incurred as a direct result of COVID-19 activities described above. SoCalGas  
25 is seeking to recover \$0.410 million of incremental payroll taxes costs associated with the  
26 incremental labor related to COVID-19.

27 **q. Avoided O&M Costs**

28 SoCalGas underwent an exercise to identify costs that were avoided as a result of COVID-  
29 19. SoCalGas identified avoided costs associated to the following categories of expenses: (1)  
30 GCT facilities costs (e.g., lower HVAC and janitorial bills for some periods), (2) customer  
31 remittance processing costs, (3) employee travel and training costs, and (4) collection notices

1 postage costs. However, SoCalGas determined that other costs in these same categories were not  
2 avoided as a result of COVID-19. Costs that were not avoided were:

- 3 A. Although employees were working from home and not in the GCT, rent and  
4 parking expenses related to the GCT were incurred in line with those authorized  
5 in the 2019 GRC because payments were made in accordance with contracts and  
6 legal obligations to pay.
- 7 B. Although the customer branch offices were closed to the public, rent and utilities  
8 expenses related to the customer branch offices were incurred in line with those  
9 authorized in the GRC as the branches were still operating (e.g., responding to  
10 customer calls, processing payments, etc.); and
- 11 C. Although there was a disconnection moratorium, the field collections efforts were  
12 redeployed to other areas, including but not limited to Meter Set Assembly  
13 Inspection (MSAI) and customer support.

14 In a typical year, SoCalGas employees across the enterprise participate in events such as  
15 internal and external meetings, industry conferences, and other business activities that may  
16 require the use of transportation and lodging. The requirement to stay home during the  
17 California Stay Home Order caused employees to cancel planned business trips, cancel  
18 participation in conferences, and participate in meetings via virtual means. As a result,  
19 SoCalGas recorded lower employee costs related to travel and training. SoCalGas also  
20 experienced a reduction in certain costs related to maintaining the GCT. Also, due to the  
21 temporary closures of the company branch offices, certain costs related to the customer  
22 remittance process function were avoided. Lastly, due to the COVID-related disconnection  
23 moratorium SoCalGas recorded lower postage costs related to mailing collection notices.

## 24 **2. Capital Activities**

### 25 **a. MSA Airline Respirators**

26 In May 2020, after reviewing current PPE protocols, SoCalGas decided to purchase MSA  
27 Airline Respirator kits (e.g., full-face respirators, associated adaptors, cartridges and storage  
28 bags) to supply all ~1,700 trained and qualified employees with individually assigned units due

1 to concerns with employees sharing equipment. This equipment was used on an ‘as needed’ basis  
2 when employees are or may be exposed to airborne hazards.

3 **b. Pico Training A/V Upgrade**

4 Maintaining the safety and health of the employees at this critical SoCalGas Pico Rivera  
5 training facility was crucial for sustaining operational continuity. Field Operations Training  
6 Instructors are experienced individuals that have specialized training to perform their duties in a  
7 safe and reliable manner. This specialized training means they could not be easily replaced if  
8 some or all had become ill, potentially causing staffing to fall below minimum requirements and,  
9 thus, requiring SCG to temporarily shut down the Field Operations Training function.

10 Based on available public health data and the need to comply with government COVID-  
11 19 directives, SoCalGas took measures to protect the health and safety of its employees that had  
12 to report in-person to the facility during the pandemic by installing several AV/IT Training  
13 assistance tools to comply with social distancing mandate.

1 **III. WITNESS QUALIFICATIONS**

2 Christopher Bissonnette

3 My name is Christopher Bissonnette and I am currently employed by the Southern  
4 California Gas Company. My business address is 555 W Fifth St., Los Angeles, California,  
5 90013. I am currently the Director of Human Resources. I oversee the Human Resources  
6 Business Partner team, Talent Acquisition, Compensation, Workplace Investigations, and our  
7 Human Resources Information Systems. Prior to my current role, I was the Director of Labor  
8 Relations and Wellness, where I oversaw the human resources functions for union employees, as  
9 well as our wellness (employee assistance, well-being, and drug and alcohol testing programs). I  
10 also oversaw Employee Care Services, which administers all Company leave of absence and  
11 return to work programs. I have been in Human Resources since 2019.

12 I started at Sempra Energy, SoCalGas' parent company, in 2008, as Senior Counsel for  
13 Labor and Employment. I held that role until 2017 when I became the Acting Assistant General  
14 Counsel for Regulatory, overseeing a team of 10 regulatory attorneys handling a number of cases  
15 before the California Public Utilities Commission.

16 From March 2020 through June 2023, I was one of the primary Human Resources  
17 representatives on SoCalGas' COVID-19 Incident Command Structure (ICS) team. I played a  
18 significant role in the Company's pandemic response.

19 Before joining the Company, I was an attorney at Paul Hastings and Jackson Lewis  
20 between 1999 and 2008. I have a Juris Doctor degree from Northeastern University and a  
21 Bachelor of Arts degree from Hofstra University.

22 Bonnie Burns

23 My name is Bonnie Burns. I am employed by the Southern California Gas Company as  
24 the Safety & Health Compliance Manager in the Safety Management Systems department. My  
25 business address is 9400 Oakdale Avenue, Chatsworth, California, 91311. I hold a Bachelor of  
26 Science and a Master of Science degree in Environmental & Occupational Health from  
27 California State University at Northridge, California. I am a Certified Industrial Hygienist by the  
28 Board for Global EHS Credentialing.

29 I have been employed by the Southern California Gas Company since 1993 and have held  
30 positions of increasing responsibilities as a Safety Consultant, Senior Industrial Hygienist, Team  
31 Lead – Industrial Hygiene, all within the Safety department. As the Safety & Health Compliance



1 Manager, my team manages our industrial hygiene and ergonomics programs. My department,  
2 in conjunction with other departments, developed our COVID-19 policies to comply with  
3 guidelines and regulatory requirements.

4 Ralf Balzer

5 My name is Ralf Balzer, and I am currently employed by the Southern California Gas  
6 Company. My business address is 8101 Rosemead Blvd, Pico Rivera, Los Angeles, California,  
7 90660. I am the Sourcing, Inventory, and Logistics Strategy Manager for SoCalGas since August  
8 2016. I have been employed by SoCalGas since December 1999 and have held positions of  
9 increasing responsibilities as a Meter Reader, Field Instructor, Meter Reading Supervisor,  
10 Training Manager, Routing Optimization Team Lead, and Community Liaison Project Manager.  
11 As a Sourcing, Inventory and Logistics Strategy Manager, I oversee the procurement,  
12 management, and transportation of gas-carrying materials and PPE. I played a significant role in  
13 the response to COVID-19 by leading the procurement, management and distribution of PPE and  
14 cleaning supplies.

15 I have a Bachelor of Art in Business Administration from the University of La Verne and  
16 a Master of Business Administration from the University of Southern California.

17 Orlando Carrasquillo

18 My name is Orlando Carrasquillo. My business address is 8101 Rosemead Blvd, Pico  
19 Rivera, Los Angeles, California, 90660. I am the Facility and Operations Supply Manager for  
20 SoCalGas as of February 2020. I have been employed by SoCalGas since 2003 and have held  
21 positions of increasing responsibilities as a Residential Energy Technician, as a Relief  
22 Commercial Technician, as a Facility Mechanic, as a Facility Manager and Facility Operations  
23 Manager. As a Facility and Operations Supply Manager, I oversee the operation and  
24 maintenance of all the building assets throughout the SoCalGas territory focusing on compliance,  
25 as well as managing contracted services. My department, in conjunction with other departments,  
26 rolled out the physical mitigation efforts developed in our COVID-19 policy for a safe  
27 workplace.

28 Ernie Cervantes

29 My name is Ernie Cervantes and I am currently employed by the Southern California Gas  
30 Company. My business address is 8101 Rosemead Blvd, Pico Rivera, CA 90660. I am currently  
31 the Support Services Training Manager. I've been employed with the company for 40 years and

1 have held various managerial positions namely Dispatch Manager, Field Operations Manager,  
2 Fleet Maintenance Manager, and Fleet & Facilities Training Manager. Additionally, I oversaw  
3 Fleet Training for both SoCalGas and SDG&E. During the COVID-19 pandemic, I was  
4 responsible for overseeing the execution of the tiered response cleaning of SoCalGas's fleet  
5 vehicles.

**EXHIBIT 2-1**

Letter Sent to CPUC to Invoke CEMA – COVID-19 Pandemic



**Dan Skopec**  
Vice President, Regulatory Affairs

8330 Century Park Court, CP33A  
San Diego, CA 92123-1530  
Tel: 858-650-4189  
DSkopec@sdge.com

March 17, 2020

Ms. Alice Stebbins  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: State of Emergency Proclamation – COVID-19 Coronavirus Preparation**

Dear Ms. Stebbins,

Pursuant to Governor Newsom's Proclamation of a State of Emergency of March 4, 2020, and President Donald Trump's Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (Covid-19) Outbreak of March 13, 2020, Southern California Gas Company (SoCalGas) is providing notice that its Catastrophic Event Memorandum Account (CEMA) has been invoked to prepare for and respond to the declared State of Emergency by government authorities. This letter is being provided in accordance with the provisions of California Public Utilities Commission (Commission) Resolution No. E-3238, dated July 24, 1991, and SoCalGas' Preliminary Statement Part VI – Memorandum Accounts, which require SoCalGas to provide information concerning the impact of the catastrophic event on its facilities and an estimate of costs that have been or will be incurred in response to the catastrophic event.

**State of Emergency Declared – March 4, 2020**

On March 4, 2020, Governor Gavin Newsom proclaimed a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.<sup>1</sup> In addition, President Trump signed an Emergency Declaration on March 13, 2020.<sup>2</sup> Throughout California, communities are responding to an increasing number of reported COVID-19 cases. Health experts predict that the number of cases will continue to increase. Certain California counties have banned large gatherings, and the Governor of New York has announced the implementation of a "containment zone" in an effort to control the spread of the virus. As of March 10, 2020, 157 Californians had tested positive for the virus, with over 10,000 being monitored.<sup>3</sup> SoCalGas has implemented measures in an effort to protect its employees from the spread of the virus, including but not limited to a hold on non-essential travel, limiting large meetings, encouraging the use of video or web conferences, and increased sanitization practices. If the epidemic continues to grow, SoCalGas plans to increase its efforts to protect employees and the public through additional measures. SoCalGas is committed to complying with directions from the Commission, the state of California, and the federal government in response to the evolving pandemic.

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<sup>1</sup> Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

<sup>2</sup> Available at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>.

<sup>3</sup> See <https://www.cdph.ca.gov/Programs/OPA/Pages/NR20-017.aspx>.

## **Background**

The CEMA requires that within 30 days of the event SoCalGas provide the Executive Director of the Commission information concerning the catastrophic event, including the impact on its facilities and a preliminary estimate of the costs that have been or will be incurred in response to the catastrophic event. The costs eligible for entry into the CEMA are those costs associated with 1) restoring utility services to customers, 2) repairing, replacing, or restoring damaged utility facilities, and 3) complying with government agency orders resulting from declared disasters. Costs recorded in the CEMA shall be restricted to those incremental costs incurred by SoCalGas in response to the disaster declared by government authorities. Before recovery in jurisdictional rates of any costs recorded in the CEMA, SoCalGas will make a formal increase request and recommendation by application to the Commission.

## **Impacts on Services and Facilities**

Unlike other emergencies, the uncertainty surrounding the COVID-19 outbreak and its spread are difficult to predict. For example, in an earthquake or wildfire situation, the emergency event occurs, there is a declaration of emergency, the emergency ends, and the utility is left in a position to identify the associated costs incurred. In a developing pandemic situation, the full scope of the impact is slow in developing and may not be known for some time. Regardless of these uncertainties, employee and public safety are SoCalGas' top priority. Currently, SoCalGas has implemented initial measures to prevent the spread of COVID-19 at its facilities and protect the safety of its customers and employees. For example, SoCalGas has activated its Emergency Operations Center at a Level 2 for monitoring and responsiveness to the situation and has created a cross-department pandemic taskforce to respond to any forthcoming challenges. Also, as described above, SoCalGas has already implemented preventative measures. Should the outbreak and associated government response continue to escalate, however, SoCalGas could face additional costs, including but not limited to those related to supply and equipment shortages, and the cancellation of contracts or need to engage alternative suppliers to fulfill business needs due to *force majeure*.

Accordingly, out of an abundance of caution, and to comply with the Commission's requirement that a utility invoke its CEMA within 30 days of a disaster declaration, SoCalGas is opening its CEMA to track costs associated with the COVID-19 response. As of this date, such expenses are minimal. Future costs will be incurred to the extent required to protect public and employee safety, and ensure continuation of safe, reliable operations. Although a complete cost estimate cannot be provided at this time, SoCalGas is committed to maintaining an open line of communication with the Commission and intends to report further additional costs as they arise under this uniquely challenging situation.

Please feel free to contact me if you have any questions or need additional information.

Very truly yours,



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Dan Skopec  
Vice President – Regulatory Affairs

cc: CPUC President Marybel Batjer  
Commissioner Liane M. Randolph  
Commissioner Clifford Rechtschaffen  
Commissioner Genevieve Shiroma  
Commissioner Martha Guzman-Aceves  
Edward Randolph, Energy Division