**Data Request TURN-SCG-50**

**A.10-12-006 SoCalGas 2012 TY GRC**

**Request Sent: December 7, 2011**

**Response Due, per agreement between TURN and SoCalGas: Dec. 8, 2011**

**Customer Service Field Operations & Customer Contact – Branch Offices & Authorized Pay Locations (Exhibits SCG-7, SCG-207)**

1. SCG’s workpaper Ex. SCG-07-WP-R/E. Fong, p. 125 provides the cost breakdown for FACTA Red Flag implementation at APLs, including 1 FTE at SoCalGas “to assist with APLs” and incremental non-labor costs at APLs associated with each “Positive Identification (POSID)” of $0.31 per transaction, plus $0.05 per image stored. At Ex. SCG-207, pp. EF-51 - 52, SCG explains that “FACTA implementation at APLs raised privacy and identity theft concerns,” and as a result, SCG did not include APLs in the FACTA Red Flag implementation. Please answer the following questions about these statements.

a. At the time SCG prepared its direct testimony in this proceeding, when did SCG plan to implement FACTA Red Flag procedures at APLs?

b. When did SCG’s concerns about “customer information security and with customers sharing personal information with non-company employees” (Ex. SCG-207, p. EF-52) at APLs arise?

1. At Ex. SCG-207, p. EF-52, SCG states: “SCG is seeking alternative solutions to increase the opportunities for FACTA customer identification verification.” When did SCG begin seeking alternatives to the approach for FACTA Red Flag implementation at APLs that formed the basis of SCG’s forecast in workpaper Ex. SCG-07-WP-R/E. Fong, p. 125?
2. Does SoCalGas believe that FACTA red flag implementation is required at APLs?
3. At Ex. SCG-207, p. EF-52, SCG states: “SCG is assessing and evaluating the use of third party services that provide customer ‘challenge’ questions to ensure customer identity verification.” Please answer the following questions related to this statement.

a. What is the status of SoCalGas’ evaluation of the use of “third party services that provide customer ‘challenge’ questions to ensure customer identity verification” for FACTA red flag compliance work at APLs?

b. If SoCalGas has decided to use this approach, please

(i) Provide a cost breakdown showing SoCalGas’ anticipated annual budget for FACTA Red Flag compliance work at APLs using this approach.

(ii) Provide an estimated implementation date.

c. If SoCalGas is evaluating an approach to FACTA compliance at APLs other than the approach referenced in question (a) above, please

(i) Describe the approach;

(ii) Provide a cost breakdown showing SoCalGas’ anticipated annual budget for FACTA red flag compliance work at APLs using the approach described in response to part (i);

(iii) Estimate when SoCalGas expects to implement this approach if adopted.

If SoCalGas is evaluating multiple approaches, please answer parts (i) through (iii) for each approach under consideration.

d. If SoCalGas has already decided upon an approach to FACTA compliance at APLs other than the approach referenced in question (a) above, please

(i) Describe the approach;

(ii) Provide a cost breakdown showing SoCalGas’ anticipated annual budget for FACTA red flag compliance work at APLs using the approach described in response to part (i);

(iii) Identify when SoCalGas expects to implement this approach.