

**DRA DATA REQUEST**  
**DRA-SCG-DR-144**  
**SOCALGAS 2012 GRC – A.10-12-006**  
**SOCALGAS RESPONSE**  
**DATE RECEIVED: NOVEMBER 4, 2011**  
**DATE RESPONDED: NOVEMBER 17, 2011**

**Subject:** SCG Rebuttal

**Please provide the following:**

1. Referring to SCG-202, page GOM-65, please provide the following:
  - a. An estimate of the cost savings to customer service personnel associated with their no longer being responsible for replacement of obsolete regulators.
  - b. Were such cost savings reflected in SCG's filing? Please explain fully and if so, provide references.

**SoCalGas Response 01:**

- a. The Customer Service regulator replacement policy has not changed. Customer Service personnel will continue to replace obsolete regulators as in the past; therefore, there will be no cost savings associated with this work.

The regulators that will be replaced by Distribution personnel are *incremental* to the regulators traditionally replaced by Customer Service personnel. As stated in response to data request DRA-81, Distribution employees may also encounter these obsolete regulators when working at the MSA. For this reason, SCG will now begin to engage Distribution employees in this replacement activity, thereby leveraging the time when a Distribution employee is on site. It is less costly to replace the regulator while on site rather than create a secondary order for a scheduled replacement at a later date.

- b. Please see response to question 1a above.

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2. Referring to SCG-202, page GOM-88, please provide the following:
- a. An estimate of the cost savings associated with GOS personnel no longer dedicating their time to the OP/EX 20/20 program as they were doing in 2007.
  - b. Were such cost savings reflected in SCG's filing? Please explain fully and if so, provide references.

**SoCalGas Response 01:**

- a. SCG will not experience an overall reduction in expenditure associated with Gas Operations Services (GOS) personnel no longer dedicating their time to the OpEx 20/20 program. The recording of labor expenditures for these employees will shift from the OpEx 20/20 programs (generally capital development and implementation efforts) back to GOS, as the employees return to their traditional functions. This was explained in more detail in Exhibit SCG-202, pages GOM-90 and GOM-91:

*The GOS employees and costs redeployed to the OpEx 20/20 Program since 2007 have been charged to the OpEx 20/20 Program and, as such, do not show up in the historical data for the Operations Management and Training area. While they do show up in the historical data for the OpEx 20/20 Program, they were not used to create the TY2012 forecast for the OpEx 20/20 Program, which was not based on historical recorded data, but was instead zero-based. (Please refer to the revised direct testimony and workpapers of SCG witness Mr. Phillips, Exhibit SCG-13.) The OpEx 20/20 Program forecast was based only on the funds and FTEs required to continue building the remaining OpEx 20/20 Program tools, and excluded FTEs and costs associated with those employees returning to GOS. For this reason, these employees and costs are not double counted. The historical FTEs and costs do appear in the OpEx 20/20 Program historical spending levels, but the forecasted FTEs and costs only appear in Operations Management and Training.*

- b. Please refer to the response to 2(a) above.

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3. Referring to SCG-202, page GOM-103, fn. 158, please explain how the fact that children might learn better from videos presented by teachers in classroom settings is relevant to determining that field personnel must have video capabilities on their laptop computers.

**SoCalGas Response 03:**

SCG provided the reference as an example of educators using videos to enhance classroom and other training. As described in Exhibits SCG-02 and SCG-202 and the response to data request DRA-SCG-094-DAO, the main drivers for producing these videos are to supplement existing training materials and reinforce safe work practices.

*Video Embedded System Instructions (VESIs) will supplement the field binders and system instructions by refreshing training and reinforcing safe practices. With the new VESIs, field employees will no longer be forced to rely strictly on their memory, field manuals, and supervisor assistance to safely perform various technical tasks. The employee will be able to use his/her MDT to access the system instruction. A video embedded within the system instruction will also be accessible to demonstrate the proper, safe method to perform the task with a visual demonstration and narration. By reinforcing safe practices in the video, VESIs will help maintain SoCalGas' high quality and safety standards.*

*Many experienced technicians are retiring and/or moving to other positions; hence, SoCalGas' newer workforce and supervisors are less experienced. With the new VESIs, employees will have the confidence to complete their tasks safely without needing to rely solely on paper manuals or other personnel for guidance.*

SCG is not requesting funding to provide field personnel with video capabilities on their laptops, but rather the expenditures necessary to create the videos and embed them into existing system instructions. Field employees already have access to the company's database of system instructions through their laptops, so they will be able to access the video enhanced system instructions in the same way.