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SOCALGAS RESPONSE
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Regarding SCE-02 –Distribution

1) Regarding SCG-02, p. GOM-16, GOM -28, GOM-31, the city of Los Osos Sewer construction entails costs to SCG to accommodate the sewer pipe installation. Are these costs charged to the city of Los Osos? If so, identify where in this application these revenues are discussed. If not, why not?

SoCalGas Response:

No, the costs that SoCalGas incurs as a result of the Los Osos sewer project are not charged to the city of Los Osos. As per Section 4(d) of the Franchise Agreement between SoCalGas and the County of San Luis Obispo (Los Osos is not an incorporated city), SoCalGas is required to "remove or relocate, without expense to the County, any facilities installed, used and maintained…" by SoCalGas. Therefore, there will be no offsetting revenues gained by SoCalGas.

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2) Regarding the new environmental regulatory balancing account (GOM-22):

   a) When will SCG finalize its forecast of costs likely from the final GHG mandatory Reporting Rule Subpart W adopted in November, 2010?
   b) In the event that SCG's assessment of the final rule leads to a forecast substantially lower than the $23.4 million identified in GOM-22, will SCG still advocate a separate New Environmental Regulatory Balancing Account? If so, provide your justification.
   c) SCG-34, p. GDS-6 identifies costs for Subpart W in the testimony of Stanford (Ex. SCG-5). Provide a reference to where these costs are quantified in Ex SCG-05 and in the accompanying work papers. If none, please quantify the expected costs due to Subpart W, with work papers.

SoCalGas Response to Question 2:

a) SoCalGas is currently supporting the American Gas Association who is working with EPA to gain greater clarity on the rulings and its requirements for Subpart W as it applies to SoCalGas' business operations. Until more specific guidance is received SoCalGas is not in a position to provide an updated cost estimate. SoCalGas will update its cost estimates when new information becomes available.

b) Regardless of the level of expense associated with Subpart W, SoCalGas will still advocate a separate New Environmental Regulatory Balancing Account (NERBA). The potential volatility in the nature of the Subpart W expenses, and the potential for volatility in other pending environmental regulation illustrates exactly why the NERBA is necessary.

c) There are two references within Mr. Stanford's testimony (Exhibit SCG-05) that refer to the costs of compliance with Subpart W. The first is in the Capital section of his testimony on page RKS-81 for Budget Code 730. This capital budget category captures laboratory equipment expenses. It is within this category that the optical imaging and high-volume sampling equipment will be purchased to address the requirements of Subpart W:

> *The forecast for 2011 is a repeat of 2010 plus $670,000 for purchases of new equipment specifically related to preparing for compliance with expected new GHG emissions regulations.*

The second reference is the Capital Work paper for Budget Code 730 (See Exhibit SCG-05-CWP, page RKS-CWP-263). This reference provides additional details on the purpose, description, costs, and justification for purchasing the equipment:

SoCalGas Response to Question 2 (Continued)

Proposed new requirements found in the uncapped sectors of AB 32 and EPA's Subpart W "Mandatory Reporting" require enhanced leak detection and measurement of fugitive methane emissions. EPA's Subpart W specifically will require direct measurement for certain equipment using optical imaging instruments for emissions detection and high-volume samplers for emissions measurement. Proposed as required tools are optical imaging devices that cost approximately $100K each and high-volume samplers that cost approximately $30,000 each. The Engineering Laboratory proposes to purchase four optical imaging devices and nine high-volume samplers in 2011.

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3) Regarding supplemental workpapers for 2GD002.000 (workpapers p. 39 -52 of SCG-02):

   a) Estimates are made at overtime rates. Provide the full justification for overtime rates. Does this mean that workers are assumed to have worked 8 hours during the day and then do these tasks on overtime? Explain fully the assumptions and justify their reasonableness.
   b) Is it SCG's position that 100% of the orders covered by workpapers 39-47 must be done at overtime rates? If the reason has to do with working after business hours, is it SCG's position that NO portion of the tasks can be done during business hours? If so, explain fully the justification for this position. (We note that work papers 48-52 have a column "% of jobs affected.")
   c) Describe fully the contracts SCG has with unions regarding the need for overtime rates (the labor agreement schedule). When was the last agreement negotiated? When is the agreement up for re-negotiation?
   d) If crews must work at night on these tasks, does SCG have regular crews that work the night shift at regular (non-overtime) rates? Explain fully SCG's procedures for employing crews that regularly work at night, and any shift differential that is required.

SoCalGas Response to Question 3:

a) Forecasted incremental labor hours are for activities performed in addition to existing tasks/jobs. Given that today's level of staffing is just sufficient to perform the existing activities, incremental work must be performed by using overtime, adding new personnel or using contract crews.

   By forecasting incremental work with the use of overtime, SoCalGas has the flexibility to determine if overtime can be managed to complete the tasks at hand, whether contract crews should be used or if the utility should commit to the longer-term hiring of employees. Since these decisions depend on future operating conditions which cannot be forecast, the use of overtime rates captures the additional expense associated with contractor rates or the additional expense associated with hiring new employees that would otherwise not be covered by SoCalGas' GRC request should those decisions be made.

SoCalGas Response to Question 3 (Continued):

b) The incremental hours shown on the work paper pages 39-46 are new work elements. As stated in Response 3a, the overtime rate was used to compensate the Utility for the event that new employees are hired, contract crews are utilized, or in the use of an existing employee outside their regularly scheduled work hours.

The incremental hours shown on the work papers pages 47-52 are related to existing tasks. As stated in Response 3a, the overtime rate was used to capture the costs that would be incurred as the employees remained at the job site to complete the task. Thus this incremental work would require the use of overtime for these activities or through displacement (which means the substitution of incremental work for existing work). Displacement thus allows certain incremental work to be performed on straight-time and causes other work normally performed on a straight-time basis to be performed using overtime.

c) The "labor agreement schedule" reference shown on the work paper simply identifies the source of the overtime rate. The agreement effective March 1, 2009, defines overtime as "time worked prior to or after an employee's regularly scheduled working hours or time worked during non scheduled working days." This contract expires on October 1, 2011. There have been no indications that this definition of overtime will change.

d) These specific tasks are not directly tied to night work, but are additional work elements that must be done by the existing workforce, for which the cost has been estimated using the overtime rate. (Please see response to question 3(a).)

Generally, SoCalGas Gas Distribution crew shifts are during daylight hours. Night work done by distribution crews is generally to handle emergency situations, or to address specific city/municipality requests to complete construction/repairs during the night (to address traffic and safety concerns, etc). Crews required to work at night on off-hour situations are paid at the overtime rate.

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4) Regarding Workpapers to SCG-02 p. 63:

   a) Why is initial instruction undertaken at overtime rates? Fully justify your position.
   b) Why is annual review undertaken at overtime rates?

SoCalGas Response:

   a) Periodic training of field employees is traditionally completed during the employees' regular scheduled work hours. Thus fewer employees are available in the field to complete regular work assignments. The regular work of those attending training is managed within the remaining employee base, and is in addition to their own work assignments. It is anticipated the overtime will be required to complete these field assignments while selected employees are attending training. Thus the overtime rate was used to appropriately compensate/fund the utility for the cost that will be incurred as employees attend this training.

   b) Please see response to Question 4(a).

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5) Regarding supplemental workpapers for 2GD000.006 (workpapers p. 63 -69 of SCG-02):

   a) Estimates are made at overtime rates. Provide the full justification for overtime rates. Does this mean that workers are assumed to have worked 8 hours during the day and then do these tasks on overtime? Explain fully the assumptions and justify their reasonableness.
   b) Is it SCG's position that 100% of the orders covered by work paper p. 66 must be done at overtime rates? Discuss the necessity for overtime rates for these tasks. If the reason has to do with working after business hours, is it SCG's position that NO portion of the tasks can be done during business hours? If so, explain fully the justification for this position.

SoCalGas Response:

a) Please see response to Question 3(a).

b) Please see response to Question 3(a) for an explanation of the necessity for overtime rates.

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6) Regarding Workpapers to SCG 02, p. 116-118:

   a) Additional training of field employees in the use of new technology related to OpEx initiatives occurs in each year, 2010-2012. Describe fully why training is needed in each year, what type of training it is, length of training, and number of staff to be trained.
   b) Once the workforce is trained in the new technology, won't the training cost for OpEx initiatives cost be eliminated in years after the test year? Describe fully the post test-year costs anticipated for this task.
   c) Quantify the cost needed for the annual procedural training for the set up and dismantling of pedestrian access ramps. Justify fully why this training needs to occur on an annual basis. If this annual training affects several line items (beyond 2GD000.000), identify the line items and include the dollar total for all of them. Identify number of staff to be trained, hours of training, and hourly rate for the training.

SoCalGas Response to Question 6:

a) The requirement for this training is discussed in testimony at SCG-02 page GOM-35 and 36. It is being scheduled to coincide with the introduction of the new technology. The OpEx initiatives will be rolled out in different phases, with each initiative requiring unique training. Initial training for the Maintenance and Inspection initiative (M&I) will occur in 2010, for the Geographic Information System (GIS) initiative in 2010 and 2011, and lastly for the Construction initiative in 2012. This scheduling is described within the work paper Exhibit SCG-02-WP 2GD000.000 pages 128-129. The length of training and the number of staff to be trained can be found on page 129 of the work papers.
b) There will be ongoing OpEx training required post test year to: (a) incorporate system enhancements, (b) instruct new employees, and (c) instruct employees new to a position. The system enhancement need is projected to be approximately 8 hours per year for each impacted employee. The training for new employees and those new to the position is for the use of the mobile data terminal to receive and record work assignments. This is projected to be approximately 1 hour per trainee. In total, SoCalGas estimates post 2012 training costs related to this technology to be $519,000 per year.
c) In response, SoCalGas would direct TURN to page 130 of SCG-02 work papers which contains the calculations including the number of employees and hours for the initial and annual review training for the pedestrian ramps. As indicated in the assumptions, approximately 50% of the employees will be trained in 2010, with the remainder being trained in 2011. That would conclude the initial training expense for this activity. The reoccurring costs are for the annual review process which is used to reconfirm employees understanding of the application of these pedestrian aids and procedures for construction. The calculation for this ongoing review (i.e. training) cost is shown on line 2 of this same work paper.

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7) Regarding the training on the GIS system (workpapers to SCG 02, p. 128-129):

   a) SCG calculates 25 FTE worth of training needed in 2012 at a cost of $2.7 million (calculated at overtime rates). In practice does SCG plan to hire an extra 25 FTE in 2012, and give them the GIS training during normal business hours? If not, discuss fully SCG's plan for this training.
   b) Once the workforce is trained on the GIS equipment by 2012, isn't this cost avoided in future years? If not discuss fully. Does SCG plan to include GIS equipment training in its existing training for new hires?

SoCalGas Response:

a) The total FTEs shown on work papers SCG-02, page 128-129 is the combined total field training for the introduction of three OpEx initiatives -- GIS, Maintenance and Inspection, and Construction systems.
Periodic training of field employees is traditionally completed during the employees regular scheduled work hours. The 25 FTEs represents the time these employees are in training and thus unavailable to complete their regular field assignments. The regular work of those attending training is managed within the remaining employee base, and is in addition to their own work assignments. It is anticipated the overtime will be required to complete these field assignments while selected employees are attending training. Thus the overtime rate was used to appropriately compensate the Utility for the cost that will be incurred as employees attend this training.

b) See response to Question 6(b) for information regarding the ongoing nature of these training expenses. For applicable positions, GIS systems training will be integrated into the standard materials. The estimate for ongoing training needs across all of the OpEx initiatives for new employess addresses the **additional** time incurred by employees attending class.

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8) Regarding Workpapers to SCG 02, p. 133, describe the reason for the variations in non-labor expense in 2005-2009. Identify the major changes in each year.

SoCalGas Response:

This work group captures the costs for the purchase of small tools, small pipe fittings, miscellaneous pipeline materials and miscellaneous installation materials used during construction and maintenance activities. These include items such as: screw drivers, wrenches, couplings, ells, bolts, stakes, pipe straps, cold patch asphalt, and pre-mix concrete. These materials are used by the field crews in completing daily maintenance and construction activities. Therefore, non labor expenses in this work group will vary as the levels of work increase or decrease, mix of activities change, and/or inventory replenishment.

The change between 2005 and 2006 is primarily related to an increase in small tool purchases which can be influenced by equipment replacements and inventory needs. The change in each year between 2006 and 2009 is primarily related to a decrease in small pipe fittings – couplings, ells, nipples - which can generally be attributed to a decline in new business activity.

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9) SCG has roughly 1,600 distribution employees.

   a) Describe fully the need for purchase of 2700 safety vests each year. (Workpapers, p. 140). Do the old vests not last for a year?
   b) Are the new vests likely to last longer than the old vests? Compare the durability and describe fully the differences in the vests.

SoCalGas Response:

a) The 1,600 distribution employees include field, office, and all management employees within Gas Distribution. While some of these employees will require the use of a vest on the job, this number was not directly relevant to the determination of the purchase level. The costs shown here are for purchase of vests used by the entire SoCalGas operations workforce. A variety of Company employees, including those in Gas Distribution (Supervisors, field crew employees, Measurement & Regulation, Field Planners), Transmission, Customer Service, Meter Reading, etc. use these safety vests as their work assignments dictate. For example, some distribution field employees may require a safety vest to be used on a regular basis, while an office, or Planning employee may only need to wear a vest occasionally.

   Depending on the level of use and laundering, the vests may only last 6 months or they may last longer. In order to comply with the ANSI/ISEA 107 standard, the vests must be replaced when the color and retro-reflective qualities diminish as a result of wear, use and laundering. It is SoCalGas' experience that approximately 2,700 vests are purchased annually in order to have a sufficient level of stock on hand for the employees who must wear the vests for safety reasons.

b) Since these vests are new to the market, there is no comparative data regarding their durability. The primary difference in the two vests is that the new vest meets the new Cal/OSHA compliance requirements. These new requirements include a greater amount of background material and a greater amount of retro-reflective striping.

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10) Regarding Workpaper to SCG 02 p. 173, is it SCG's expectation that the new technology training will be completed in 2012? Describe fully and justify the projected need for this training in years after the test year.

SoCalGas Response to Question 10:

The table on page 173 of Exhibit SCG-02-WP shows the forecasted costs and FTEs necessary for Gas Operations Services' Support of New Technologies. One part of this support for new technologies includes training.

Gas Operations Services (GOS) will train new management users on optimizing the new processes and technology, and work with existing users to improve their proficiency on data management, review, and extraction. GOS will also train all new users on the new systems and processes. This training will continue after TY2012, as new users are introduced to the technology and processes.

While GOS's Support of New Technologies includes some training, it is not the only service provided by the group. A full description of Gas Operations Services' Support of New Technologies can be found on pages GOM-45 – GOM-46 of Exhibit SCG-02:

The OpEx 20/20 Program introduces new procedures for completing work elements, new processes for communicating information, new technology for recording and extracting information, and access to data never available before to support business management. Given its designed support role, the GOS organization inherits a new responsibility for ensuring the longer term success of integrating three key OpEx 20/20 solutions – Maintenance and Inspection, Construction Management, and Geographic Information System – into the business environment affecting nearly 1,600 Gas Distribution employees in their daily operations. In order to support the new technology and associated business processes implement by the OpEx 20/20 Program, GOS will require resources, in part to:

- *Maintain a workforce that is proficient on the use of these new technology based tools. GOS will work with the operating organizations to train new management users on optimizing these processes and the technology, and work with existing users to improve their proficiency on data management, review, and extraction. Furthermore, they will support local management in creating programs that enable the non-management employees to effectively and comfortably use these new tools in completion of their work. GOS will also train all new users on the new systems and processes;*
- *Monitor work flow processes and their relationship to the software applications. This includes validating that work methods are appropriately reflected in the software applications and also identifying changes that may be needed either in response to externally driven changes in business needs or internally identified process enhancements;*

SoCalGas Response to Question 10 (Continued):

- *Evaluate the software and technology for opportunities to extract greater value from new uses of the technology;*
- *Define enhancements to the applications as the business needs change. GOS will help define these enhancements, work with Information Systems on the required application changes, and become fully engaged in the testing and implementation of changes.*

  In completing its objectives, GOS will need to work with the operating organizations to determine proficiency gaps that need addressing, clearly identify data requirements that support the business operations and determine methods for extracting this information from the new systems, and formulate reports addressing both standard and ad hoc informational needs.

  This work is incremental and complementary to the traditional staff support efforts previously discussed. Data that the team will extract from these new information technology tools support the traditional operational review of procedures and processes. In contrast, the traditional business analysis may indicate a need for a process change which can then be coordinated with these technology specialists for incorporation into the systems design.

  SoCalGas anticipates the need for 1 to 2 analysts, advisors and/or project managers on average per region per application to address the services discussed above. This is an increase of $1,474,000 in TY2012 over the forecast base.

After TY2012, SoCalGas anticipates the same need for analysts, advisors and/or project managers for GOS Support of New Technology. As discussed above, there will be an ongoing need for GOS to train, monitor processes, evaluate technology, and define enhancements as they are needed.

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11) Regarding Workpapers to SCG 02, p. 162:

a) SCG plans to make 500 videos per year. Describe fully SCG's plans to introduce video-based instruction.
b) Does SCG expect to use fewer instructors over time as the video-based instruction is introduced? If not, why not? If so, identify the savings expected, and the year, due to video-based courses.

SoCalGas Response to Question 11:

a) Video Embedded System Instructions (VESIs) will supplement field binders and system instructions by refreshing training and reinforcing safe practices. Field employees will be able to use their laptops (or MDTs) to access system instructions with embedded videos. These VESIs will demonstrate the proper, safe method to perform a task with a visual demonstration and narration. By reinforcing safe practices in the video, VESIs will help maintain SoCalGas' high quality and safety standards. A description of the Video Embedded System Instructions can be found on pages GOM-49 – GOM-50 of Exhibit SCG-02.

   Currently, SoCalGas sends out weekly Notice of Publication (NOP) emails listing all system instructions that have been updated or changed. Front line field supervisors then inform their employees about the changes, and provide them with updated copies of the system instructions. VESIs are still in early development stages, but SoCalGas envisions that a similar process will be used to introduce new VESIs to field employees. System instructions updated with embedded videos will be listed in the weekly NOP emails. After receiving the NOP email, front line field supervisors will notify employees of the updates and load the VESIs onto their MDTs. Another possible scenario is that employee MDTs will have mobile broadband access, allowing the weekly NOP emails to be sent directly to the employees. Field employees will then be able to use their MDTs to access the VESIs through SoCalGas' online library of system instructions.

   SoCalGas expects to complete an average of 125 system instruction videos per year, starting in 2012. Over the first four years of the project, 500 videos will be completed.

b) Video Embedded System Instructions will be used to supplement and reinforce instructor-led training, but will not replace it. The videos will be a tool available to employees in the field to help reinforce training, proper work habits, and safety. They will not be used to train employees on new procedures. Training will still be performed in instructor-led courses, where instructors can monitor progress and answer questions. Therefore, SoCalGas does not expect to use fewer instructors as VESIs are introduced.

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12) In SCG's workpapers, describe how the FTE line items combine with or are included in the totals. For example, Workpapers to SCG 02, p. 116, shows 25.6 FTE for 2010. Are labor costs for those FTE included in the $2,507,000 for 2010 on that page? If not, what is the relationship between the FTEs and the labor cost?

SoCalGas Response to Question 12:

The formal work paper for each workgroup includes a table showing the base forecast, the total forecast adjustments to that base level, and the resulting adjusted-forecast. The following forecast summary table for the Field Support workgroup can be found on page 116 of Exhibit SCG-02-WP:

Area: GAS DISTRIBUTION
Witness: Orozco, Guillermina
Category: A. Field Operations & Maintenance
Category-Sub: 7. Field Support
Workpaper: 2GD000.000 - Pipeline Operations & Maintenance -- Field Support

Forecast Summary:

In 2009 $(000)										
Forecast Method		**Base Forecast**			**Forecast Adjustments**			**Adjusted-Forecast**		
		2010	**2011**	**2012**	**2010**	**2011**	**2012**	**2010**	**2011**	**2012**
Labor	Base YR Rec	12,513	12,513	12,513	2,507	1,114	3,553	15,020	13,627	16,066
Non-Labor	Base YR Rec	1,898	1,898	1,898	304	483	645	2,202	2,381	2,543
NSE	Base YR Rec	0	0	0	0	0	0	0	0	0
Total		14,411	14,411	14,411	2,811	1,597	4,198	17,222	16,008	18,609
FTE	Base YR Rec	157.4	157.4	157.4	25.6	15.3	40.7	183.0	172.7	198.1

This forecast summary table displays the sum total of all forecast adjustments to the base forecast for each of the forecast years (2010, 2011, and 2012) by labor, non-labor, and FTE components. In some instances the actual calculations are shown within the structured work paper below this table, in other cases, supplemental calculation sheets have been included. Supplemental work papers for the Field Support workgroup can be found on pages 124 – 131 of Exhibit SCG-02-WP. The table below summarizes the Field Support supplemental work papers for the year 2010.

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SoCalGas Response to Question 12 (Continued):

2010 Forecast Adjustments for Field Support (Shown in 2009 Dollars)
Testimony Pages: GOM-32 - GOM-36

Area: Gas Distribution
Witness: Gina Orozco-Mejia
Category: Field Operations and Maintenance
Workpaper: 2GD000.000

Description	Labor	Non-Labor	Total	FTE	Testimony Reference	Workpaper Reference
Area Resource Scheduling Organization	$ 510,000	$ -	$ 510,000	6.0	GOM-34	Page 126, Line 1
Wireless Fees for Mobile Data Terminals					GOM-34 - GOM-35	Page 125
Field Employees	$ -	$ 212,816	$ 212,816	0.0		Page 125, Line 1
Supervisors	$ -	$ 90,804	$ 90,804	0.0		Page 125, Line 2
Subtotal:	$ -	$ 303,620	$ 303,620	0.0		
Miscellaneous Increased Support Requirements					GOM-35	Page 127
City/Muni Req. - Limits on Const. Hours	$ 3,961	$ -	$ 3,961	0.1		Page 127, Line 5
Federal Stimulus Work	$ 3,776	$ -	$ 3,776	0.0		Page 127, Line 10
USA Paint Markings Removal	$ 15,055	$ -	$ 15,055	0.2		Page 127, Line 11
Subtotal:	$ 22,792	$ -	$ 22,792	0.3		Page 127, Line 12
Pedestrian Access at Construction Sites	$ 31,475	$ -	$ 31,475	0.5	GOM-35	Page 130, Line 1
Support Training for New Technology	$1,942,962	$ -	$1,942,962	18.8	GOM-35 - GOM-36	Page 129, Line 13
Grand Total:	$2,507,229	$ 303,620	$2,810,849	25.6		

For Field Support, each forecast adjustment can be seen in the table above, along with the forecasted labor and non-labor components and corresponding FTEs. The total labor forecast adjustment for 2010 is $2,507,000, which corresponds to 25.6 FTEs. The total forecast adjustments calculated here were added to the base forecast to determine the resulting adjusted-forecast. This can be seen in the Field Support forecast summary table on the previous page.

Workgroup cross-reference sheets similar to the table shown above were created for TY2012 and can be found on pages 209 – 218 of Exhibit SCG-02-WP.