

Application of SAN DIEGO GAS & ELECTRIC COMPANY for authority to update its gas and electric revenue requirement and base rates effective January 1, 2012 (U 902-M)))	A-10-12-005
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Application of SOUTHERN CALIFORNIA GAS COMPANY for authority to update its gas revenue requirement and base rates effective January 1, 2012 (U 904-G)))	A-10-12-006

Exhibit No.: (SCG-07-WP-R)

REVISED WORKPAPERS TO
PREPARED DIRECT TESTIMONY
OF EDWARD FONG
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

JULY 2011



**2012 General Rate Case - REVISED
INDEX OF WORKPAPERS**

Exhibit SCG-07-WP-R - CS - FIELD OPERATIONS & CUSTOMER CONTACT

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2012 General Rate Case - REVISED
INDEX OF WORKPAPERS

Exhibit SCG-07-WP-R - CS - FIELD OPERATIONS & CUSTOMER CONTACT

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Overall Summary For Exhibit No. SCG-07-WP-R

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT

Witness: Fong, Edward

Description	In 2009 \$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
<i>Non-Shared Services</i>	207,028	218,229	221,708	224,930
<i>Shared Services</i>	4,944	5,429	5,390	5,391
Total	211,972	223,658	227,098	230,321

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Summary of Non-Shared Services Workpapers:

Description	In 2009 \$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
A. Customer Service Field	124,656	130,174	133,253	134,573
B. Customer Contact Center	40,578	45,524	45,829	46,305
C. Branch Offices & Authorized Payment Locations	10,137	11,135	11,135	11,135
D. Meter Reading	31,657	31,396	31,491	32,917
<i>Total</i>	207,028	218,229	221,708	224,930

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Workpaper: VARIOUS

Summary for Category: A. Customer Service Field

	In 2009\$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	116,912	121,425	124,267	125,537
Non-Labor	7,744	8,749	8,986	9,036
NSE	0	0	0	0
Total	124,656	130,174	133,253	134,573
FTE	1,613.6	1,697.0	1,741.2	1,755.1

Workpapers belonging to this Category:

2FO000.000 Customer Service Field Operations

Labor	93,033	96,530	99,118	100,487
Non-Labor	6,066	6,741	6,959	6,997
NSE	0	0	0	0
Total	99,099	103,271	106,077	107,484
FTE	1,306.3	1,373.9	1,414.6	1,430.7

2FO001.000 Customer Service Dispatch Operations

Labor	8,130	8,243	8,243	7,989
Non-Labor	198	330	330	330
NSE	0	0	0	0
Total	8,328	8,573	8,573	8,319
FTE	109.0	113.1	113.1	109.6

2FO002.000 Customer Service Field Supervision

Labor	9,337	9,917	10,171	10,326
Non-Labor	1,081	1,217	1,236	1,248
NSE	0	0	0	0
Total	10,418	11,134	11,407	11,574
FTE	110.9	117.0	120.5	121.8

2FO003.000 Customer Service Field Management and Staff Support

Labor	6,412	6,735	6,735	6,735
Non-Labor	399	461	461	461
NSE	0	0	0	0
Total	6,811	7,196	7,196	7,196
FTE	87.4	93.0	93.0	93.0

Beginning of Workpaper
2FO000.000 - Customer Service Field Operations

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

Activity Description:

Labor and non-labor costs associated with the following activities: Initiate or close gas service without entering the customer's premises; collect payments for delinquent bills; conduct appliance checks; investigate for gas leaks; close and restoration of service for fumigation; investigate the causes of a high bill; replace customer meters; restore service after it was closed for non-payment of the gas bill; verify the meter read or other conditions at the customer premises; initiate and close service when entrance to the customer's premises is required; miscellaneous meter and regulator work; food industry orders; commercial and industrial service work; and, other miscellaneous residential and commercial orders.

Forecast Methodology:

Labor - Zero-Based

Field Operations expense is driven by many variables including order activity, off-premise time, drive time, etc. The fluctuation of these variables would not be represented in historical averaging or trending of expense, thus a zero based budget using the average of order activity along with the most recent trend of exogenous variables is most suited for this area.

Non-Labor - Zero-Based

Field Operations expense is driven by many variables including order activity, off-premise time, drive time, etc. The fluctuation of these variables would not be represented in historical averaging or trending of expense, thus a zero based budget using the average of order activity along with the most recent trend of exogenous variables is most suited for this area.

NSE - Zero-Based

NSE is not applicable to this workgroup.

Summary of Results:

Years	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Labor	91,378	93,194	93,797	90,038	93,033	96,530	99,118	100,487	
Non-Labor	7,578	6,405	5,689	6,440	6,066	6,741	6,959	6,997	
NSE	0	0	0	0	0	0	0	0	
Total	98,956	99,599	99,486	96,478	99,099	103,271	106,077	107,484	
FTE	1,339.6	1,355.1	1,347.7	1,307.4	1,306.3	1,373.9	1,414.6	1,430.7	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Field Ops-CSF Operations
Workpaper: 2FO000.000 - Customer Service Field Operations

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	Zero-Based	0	0	0	96,530	99,118	100,487	96,530	99,118	100,487
Non-Labor	Zero-Based	0	0	0	6,741	6,959	6,997	6,741	6,959	6,997
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	103,271	106,077	107,484	103,271	106,077	107,484
FTE	Zero-Based	0.0	0.0	0.0	1,373.9	1,414.6	1,430.7	1,373.9	1,414.6	1,430.7

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	90,339	0	0	90,339	0.0	1-Sided Adj

Labor costs associated with the customer service field employees performing forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History and Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2010	0	6,613	0	6,613	0.0	1-Sided Adj
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Non-labor costs required for customer service field employees' materials, small tools, and uniforms. Non-labor forecast methodology – 5-year average of non-labor per full-time equivalent x forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2010	0	0	0	0	1,281.8	1-Sided Adj
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FTEs associated with the customer service field employees forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History and Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2010	5,703	0	0	5,703	0.0	1-Sided Adj
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Labor costs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2010	0	0	0	0	86.1	1-Sided Adj

FTEs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2010	807	0	0	807	0.0	1-Sided Adj
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Industrial Service Technician labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2010	0	128	0	128	0.0	1-Sided Adj
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Industrial Service Technician non-labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2010	0	0	0	0	10.0	1-Sided Adj
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Industrial Service Technician FTEs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf; "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2010	-319	0	0	-319	0.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2010	0	0	0	0	-4.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2010 Total	96,530	6,741	0	103,271	1,373.9	
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011	92,014	0	0	92,014	0.0	1-Sided Adj

Labor costs associated with the customer service field employees performing forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History and Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2011	0	0	0	0	1,310.6	1-Sided Adj
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FTEs associated with the customer service field employees performing forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History & Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2011	0	6,761	0	6,761	0.0	1-Sided Adj
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Non-labor costs required for customer service field employees' materials, small tools, and uniforms. Non-labor forecast methodology – 5-year average of non-labor per full-time equivalent x forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2011	1,614	0	0	1,614	0.0	1-Sided Adj
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Industrial Service Technician labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2011	0	0	0	0	20.0	1-Sided Adj
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Industrial Service Technician FTEs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2011	0	198	0	198	0.0	1-Sided Adj
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Industrial Service Technician non-labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011	5,809	0	0	5,809	0.0	1-Sided Adj

Labor costs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2011	0	0	0	0	88.0	1-Sided Adj
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FTEs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2011	-319	0	0	-319	0.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2011	0	0	0	0	-4.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2011 Total	99,118	6,959	0	106,077	1,414.6	
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2012	93,694	0	0	93,694	0.0	1-Sided Adj
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Labor costs associated with the customer service field employees performing forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History and Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2012	0	6,858	0	6,858	0.0	1-Sided Adj
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Non-labor costs required for customer service field employees' materials, small tools, and uniforms. Non-labor forecast methodology – 5-year average of non-labor per full-time equivalent x forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	0	0	0	0	1,329.4	1-Sided Adj

FTEs associated with the customer service field employees performing forecasted order activities. Order forecast methodology – 5-year average of orders per active meter. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - B. Workload History and Forecast and C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2012	1,614	0	0	1,614	0.0	1-Sided Adj
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Industrial Service Technician labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2012	0	139	0	139	0.0	1-Sided Adj
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Industrial Service Technician non-labor costs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2012	0	0	0	0	20.0	1-Sided Adj
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Industrial Service Technician FTEs associated with the tune-up and maintenance of customer equipment as a result of South Coast Air Quality Management District changes in Rules for gas engines and boiler standards and gas quality. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast".

2012	0	0	0	0	89.3	1-Sided Adj
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FTEs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2012	5,915	0	0	5,915	0.0	1-Sided Adj
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Labor costs associated with formalized training requirements for customer service field operations employees. Forecast methodology - 5-year average rate of training of 6.7% per forecasted customer service field employee full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field- C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	-417	0	0	-417	0.0	1-Sided Adj

Reduction in CSF over-time hours due to efficiencies gained as a result of the Forecasting & Scheduling Project; -8,320 OT hours x \$50.10 avg hourly rate = \$416,832. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field E. Benefit-Forecasting & Scheduling Project".

2012	0	0	0	0	-4.0	1-Sided Adj
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Reduction in CSF over-time hours due to efficiencies gained as a result of the Forecasting & Scheduling Project; -8,320 OT hours / 2088 FTE hours = 4.0 FTEs. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field E. Benefit-Forecasting & Scheduling Project".

2012	-319	0	0	-319	0.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2012	0	0	0	0	-4.0	1-Sided Adj
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Reduction in CSF labor due to efficiencies gained as a result of the Customer Service Field Operating Efficiency Project.

2012 Total	100,487	6,997	0	107,484	1,430.7	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Field Ops-CSF Operations
Workpaper: 2FO000.000 - Customer Service Field Operations

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	69,884	72,762	75,413	73,650	78,787
Non-Labor	6,225	5,881	5,336	5,910	6,020
NSE	0	0	0	0	0
Total	76,110	78,644	80,749	79,560	84,806
FTE	1,137.0	1,146.7	1,140.9	1,092.0	1,098.8
Adjustments (Nominal \$) **					
Labor	-147	-101	-57	-24	8
Non-Labor	524	32	93	546	46
NSE	0	0	0	0	0
Total	377	-70	36	522	54
FTE	-2.1	-1.4	-0.8	-0.4	-0.2
Recorded-Adjusted (Nominal \$)					
Labor	69,737	72,661	75,357	73,626	78,795
Non-Labor	6,750	5,913	5,428	6,456	6,066
NSE	0	0	0	0	0
Total	76,487	78,574	80,785	80,082	84,860
FTE	1,134.9	1,145.3	1,140.1	1,091.6	1,098.6
Vacation & Sick (Nominal \$)					
Labor	11,890	12,984	13,150	14,188	14,238
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	11,890	12,984	13,150	14,188	14,238
FTE	204.7	209.8	207.6	215.8	207.7
Escalation to 2009\$					
Labor	9,750	7,549	5,290	2,224	0
Non-Labor	828	492	261	-16	0
NSE	0	0	0	0	0
Total	10,578	8,041	5,551	2,208	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	91,378	93,194	93,797	90,038	93,033
Non-Labor	7,578	6,405	5,689	6,440	6,066
NSE	0	0	0	0	0
Total	98,956	99,599	99,486	96,478	99,099
FTE	1,339.6	1,355.1	1,347.7	1,307.4	1,306.3

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Field Ops-CSF Operations
Workpaper: 2FO000.000 - Customer Service Field Operations

Summary of Adjustments to Recorded:

In Nominal \$ (000)						
Year	2005	2006	2007	2008	2009	
Labor	-147	-101	-57	-24	8	
Non-Labor	524	32	93	546	46	
NSE	0	0	0	0	0	
Total	377	-70	36	522	54	
FTE	-2.1	-1.4	-0.8	-0.4	-0.2	

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	-147	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 14952570
Reduction of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field Ops-CSF Support.							
2005	0	0	0	-2.1	1-Sided Adj	N/A	TPKAJ201004201 15106353
Reduction of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field.							
2005	0	31	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 15205400
Reversal of credit for cash collected associated with seismic restores, restores, and seismic activities. Cash collected for these activities is forecast in miscellaneous revenue accounts.							
2005	0	493	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 15317760
Addition of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Oper-Dispatch, 2FO002.000 CSF Support, and 2FO003.000 Staff.							
2005 Total	-147	524	0	-2.1			
2006	-101	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 21359400
Reduction of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field Ops-Support.							

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Field Ops-CSF Operations
Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	0	19	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 21444947
Reversal of credit for cash collected associated with seismic restores, restores, and seismic activities. Cash collected for these activities is forecast in miscellaneous revenue accounts.							
2006	0	0	0	-1.4	1-Sided Adj	N/A	TPKAJ201004201 21548790
Reduction of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field.							
2006	0	13	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 21700023
Addition of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch, 2FO002.000 CSF Support, and 2FO003.000 Staff.							
2006 Total	-101	32	0	-1.4			
2007	-57	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 25226727
Reduction of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field Ops-Support.							
2007	0	13	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 25310523
Reversal of credit for cash collected associated with seismic restores, restores, and seismic activities. Cash collected for these activities is forecast in miscellaneous revenue accounts.							
2007	0	79	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 25405010
Addition of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch, 2FO002.000 CSF Support, and 2FO003.000 Staff.							
2007	0	0	0	-0.8	1-Sided Adj	N/A	TPKAJ201004201 25506340
Reduction of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 CSF Support.							
2007 Total	-57	93	0	-0.8			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Field Ops-CSF Operations
 Workpaper: 2FO000.000 - Customer Service Field Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008	-24	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 33826807
Reduction of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field Ops-Support.							
2008	0	546	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 33908280
Addition of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch, 2FO002.000 CSF Support, and 2FO003.000 Staff.							
2008	0	0	0	-0.4	1-Sided Adj	N/A	TPKAJ201004201 34002850
Reduction of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field.							
2008 Total	-24	546	0	-0.4			
2009	-20	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40006070
Reduction of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field Ops-Support.							
2009	28	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40301443
Addition of customer service field union employee labor costs (retro pay as a result of contract ratification) in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 CSF Support.							
2009	0	46	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40334180
Addition of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch, 2FO002.000 CSF Support, and 2FO003.000 Staff.							
2009	0	0	0	-0.2	1-Sided Adj	N/A	TPKAJ201004201 40436790
Reduction of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO002.000 Field.							
2009 Total	8	46	0	-0.2			

Supplemental Workpapers for Workpaper 2FO000.000

Exhibit SCG-07-WP
Customer Service Field

2FO000.000_Supp1.pdf

2FO000.000 CSF Operations
2FO001.000 CSF Dispatch
2FO002.000 CSF Supervision
2FO003.000 CSF Office Support

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A		B		C		D		E		F		G		H		I	
	SCG Customer Service Field		A. Non-shared & Shared Service Summary of Forecast - ERRATA		Labor		Nbr		Total		FTE		Labor		Nbr		Total	
1																		
2																		
3																		
4																		
5																		
6																		
7																		
8																		
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A		J	K		L	M	N	O	P	Q
	In 2009 \$000's			Adjusted Historical							
	Labor	Nbr	Labor	Nbr	Total	FTE	Labor	Nbr	Total	FTE	
1	SCG Customer Service Field										
2	A. Non-shared & Shared Service Summary of Forecast -										
3											
4											
5											
6	In 2009 \$000's		Adjusted Historical								
7	Non-Shared Cost Center Workgroups										
8	Field Operations - Orders	\$87,598	\$5,689	\$93,288	1,251	\$85,371	\$6,440	\$91,811	1,235		
9	Field Operations - Training	\$6,199	\$0	\$6,199	97	\$4,667	\$0	\$4,667	72		
10	Field Operations-SCAQMID Rules	\$0	\$0	\$0	0	\$0	\$0	\$0	0		
11	Field Operations-Forecasting & Scheduling Benefit	\$0	\$0	\$0	0	\$0	\$0	\$0	0		
12	Field Operations-CSFOE Benefit	\$0	\$0	\$0	0	\$0	\$0	\$0	0		
13	Field Supervision	\$6,989	\$1,019	\$10,008	109	\$9,229	\$992	\$10,220	112		
14	Field Supervision Air Cards (OpEx On-going)	\$0	\$0	\$0	0	\$0	\$0	\$0	0		
15	Dispatch Office	\$6,402	\$328	\$8,730	115	\$8,089	\$292	\$8,381	111		
16	Dispatch Office-Forecasting & Scheduling Benefit	\$0	\$0	\$0	0	\$0	\$0	\$0	0		
17	Field & Office Management & Staff	\$6,749	\$407	\$7,156	92	\$6,560	\$386	\$6,946	90		
18	Non-Shared Total	\$117,937	\$7,444	\$125,381		\$113,915	\$8,110	\$122,026			
19											
20	Shared Services										
21	CS Field Training Manager										
22											
23	Total CS Field Training Manager (2200-0345)	\$1,381	\$99	\$1,480	18	\$1,299	\$108	\$1,407	17		
24	CS South Inland Director (2200-0437)	\$212	\$24	\$236	2	\$192	\$30	\$222	2		
25	CS Field Staff Manager										
26											
27	Total CSF Field Staff Manager (2200-0942)	\$1,831	\$111	\$1,942	22	\$1,784	\$104	\$1,888	22		
28	SDGE Eastern Project Manager (2200-2145)	\$103	\$9	\$112	1	(\$7)	\$0	(\$7)	-0.1		
29	Quality Assurance (2200-2206)	\$748	\$71	\$819	10	\$768	\$57	\$825	10		
30	Shared Total	\$4,275	\$314	\$4,589		\$4,036	\$299	\$4,335			
31											
32	Total	\$122,212	\$7,758	\$129,970		\$117,951	\$8,409	\$126,361			
33											

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	R		S		T		U		V		W		X		Y	
		Labor	Nbr	Total	Nbr	Total	FTE	Labor	Nbr	Total	Labor	Nbr	Total	FTE			
1	SCG Customer Service Field																
2	A. Non-shared & Shared Service Summary of Forecast -																
3																	
4																	
5	In 2009 \$000's																
6																	
7	Non-Shared Cost Center Workgroups																
8	Field Operations - Orders	\$68,854	\$6,066	\$94,920	1,242.8	\$96,951	\$6,613	\$96,951	1,281.8	\$90,339	\$6,613	\$96,951	1,281.8				
9	Field Operations - Training	\$4,179	\$0	\$4,179	63.5	\$5,703	\$0	\$5,703	86.1	\$5,703	\$0	\$5,703	86.1				
10	Field Operations-SCAQM Rules	\$0	\$0	\$0	0.0	\$907	\$128	\$935	9.9	\$907	\$128	\$935	9.9				
11	Field Operations-Forecasting & Scheduling Benefit	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0				
12	Field Operations-CSFOE Benefit	\$0	\$0	\$0	0.0	(\$319)	\$ -	(\$319)	-4.0	(\$319)	\$ -	(\$319)	-4.0				
13	Field Supervision	\$9,337	\$1,081	\$10,417	110.9	\$9,917	\$1,151	\$11,069	117.0	\$9,917	\$1,151	\$11,069	117.0				
14	Field Supervision Air Cards (OpEx On-going)	\$0	\$0	\$0	0.0	\$66	\$66	\$66	0.0	\$0	\$66	\$66	0.0				
15	Dispatch Office	\$5,130	\$198	\$5,328	109.0	\$8,243	\$530	\$8,573	113.1	\$8,243	\$530	\$8,573	113.1				
16	Dispatch Office-Forecasting & Scheduling Benefit	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0				
17	Field & Office Management & Staff	\$6,412	\$399	\$6,811	87.4	\$6,735	\$461	\$7,196	93.1	\$6,735	\$461	\$7,196	93.1				
18	Non-Shared Total	\$116,912	\$7,744	\$124,655		\$121,425	\$8,749	\$130,174		\$121,425	\$8,749	\$130,174					
19																	
20	Shared Services																
21	CS Field Training Manager	\$1,346	\$94	\$1,440	17.0	\$1,474	\$149	\$1,623	19.0	\$1,276	\$149	\$1,425	16.5				
22						\$198	\$0	\$198	2.5	\$198	\$0	\$198	2.5				
23	Total CS Field Training Manager (2200-0345)	\$1,346	\$94	\$1,440	17.0	\$1,474	\$149	\$1,623	19.0	\$1,276	\$149	\$1,425	16.5				
24	CS South Inland Director (2200-0437)	\$217	\$40	\$257	1.9	\$63	\$12	\$75	0.6	\$63	\$12	\$75	0.6				
25	CS Field Staff Manager	\$1,759	\$137	\$1,896	21.1	\$1,680	\$120	\$1,800	20.2	\$1,680	\$120	\$1,800	20.2				
26						\$150	\$0	\$150	1.8	\$150	\$0	\$150	1.8				
27	Total CSF Field Staff Manager (2200-0942)	\$1,759	\$137	\$1,896	21.1	\$1,830	\$120	\$1,950	22.0	\$1,830	\$120	\$1,950	22.0				
28	SDGE Eastern Project Manager (2200-2145)	\$94	\$4	\$98	1.0	\$94	\$4	\$98	1.0	\$94	\$4	\$98	1.0				
29	Quality Assurance (2200-2206)	\$576	\$64	\$640	7.6	\$697	\$63	\$760	9.2	\$576	\$63	\$639	7.6				
30	Shared Total	\$3,992	\$339	\$4,331		\$4,158	\$348	\$4,506		\$4,158	\$348	\$4,506					
31																	
32	Total	\$120,904	\$8,083	\$128,986		\$125,583	\$9,097	\$134,680		\$125,583	\$9,097	\$134,680					
33																	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	Z	AA	AB	AC	AD	AE	AF	AG
1	SCG Customer Service Field								
2	A. Non-shared & Shared Service Summary of Forecast -								
3									
4									
5	In 2009 \$000's								
6			Forecast						
			2011						
7	Non-Shared Cost Center Workgroups								
8	Field Operations - Orders	Labor	Nbr	Total	FTE	Labor	Nbr	Total	FTE
9	Field Operations - Training	\$92,014	\$6,761	\$98,775	1,310.6	\$93,694	\$6,858	\$100,552	1,329.4
10	Field Operations-SCAQMD Rules	\$5,809	\$0	\$5,809	88.0	\$5,915	\$0	\$5,915	89.3
11	Field Operations-Forecasting & Scheduling Benefit	\$1,614	\$198	\$1,811	19.8	\$1,814	\$139	\$1,753	19.8
12	Field Operations-CSFOE Benefit	\$0	\$0	\$0	0.0	(\$417)	\$0	(\$417)	-4.0
13	Field Supervision	(\$319)	\$0	(\$319)	-4.0	(\$319)	\$0	(\$319)	-4.0
14	Field Supervision Air Cards (OpEx On-going)	\$10,171	\$1,185	\$11,356	120.5	\$10,326	\$1,199	\$11,525	121.8
15	Dispatch Office	\$0	\$51	\$51	\$0	\$0	\$49	\$49	\$0
16	Dispatch Office-Forecasting & Scheduling Benefit	\$8,243	\$330	\$8,573	113.1	\$8,243	\$330	\$8,573	113.1
17	Field & Office Management & Staff	\$0	\$0	\$0	0.0	(\$254)	\$0	(\$254)	-3.5
18	Non-Shared Total	\$124,266	\$8,986	\$133,252	93.1	\$6,735	\$461	\$7,196	93.1
19						\$125,536	\$9,036	\$134,573	
20	Shared Services								
21	CS Field Training Manager	\$1,276	\$149	\$1,425	16.5	\$1,276	\$149	\$1,425	16.5
22	CS Field Training Manager	\$198	\$0	\$198	2.5	\$198	\$0	\$198	2.5
23	Total CS Field Training Manager (2200-0345)	\$1,474	\$149	\$1,623	19.0	\$1,474	\$149	\$1,623	19.0
24	CS South Inland Director (2200-0437)	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0
25	CS Field Staff Manager	\$1,680	\$120	\$1,800	20.2	\$1,680	\$120	\$1,800	20.2
26	CS Field Staff Manager	\$150	\$0	\$150	1.8	\$150	\$0	\$150	1.8
27	Total CSF Field Staff Manager (2200-0942)	\$1,830	\$120	\$1,950	22.0	\$1,830	\$120	\$1,950	22.0
28	SDGE Eastern Project Manager (2200-2145)	\$84	\$4	\$88	1.0	\$84	\$4	\$88	1.0
29	Quality Assurance (2200-2206)	\$697	\$63	\$760	9.2	\$697	\$63	\$760	9.2
30	Shared Total	\$4,095	\$336	\$4,431	9.2	\$4,095	\$336	\$4,431	9.2
31									
32	Total	\$128,361	\$9,322	\$137,683		\$129,631	\$9,372	\$139,004	
33									

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	AH	AI	AJ	AK
1	SCG Customer Service Field				
2	A. Non-shared & Shared Service Summary of Forecast -				
3					
4					
5	In 2009 \$'000's	Base Yr to Test Yr Change		Reference Tabs	Notes
6					
7	Non-Shared Cost Center Workgroups				
8	Field Operations - Orders	\$5,632	5.9%	B, C	GRID zero based; 5 yr avg per active meter - labor; 5 yr avg per FTE - non-labor
9	Field Operations - Training	\$1,736	41.5%	C	GRID zero based; 5 yr avg rate per FTE
10	Field Operations-SCAQMD Rules	\$1,753		D	GRID zero based; 2010 implementation (partial yr); gas engine & boiler assessment and gas quality rules
11	Field Operations-Forecasting & Scheduling Benefit	(\$417)		E	GRID zero based; 2010-2012 reduction in OT hours-Forecasting & Scheduling Project
12	Field Operations-CSFOE Benefit	(\$319)		E	GRID zero based; 2010-2012 reduction-CSFOE Project
13	Field Supervision	\$1,107	10.6%	C	GRID zero based; base yr ratio of employees/supv of 12 - labor; 5 yr avg per FTE - non-labor
14	Field Supervision Air Cards (OpEx On-going)	\$49		F	GRID zero based; incremental Field Force/Supervisor Enablement Initiative; cost per Field Supervisor FTE
15	Dispatch Office	\$245	2.9%	C	GRID 5 yr avg
16	Dispatch Office-Forecasting & Scheduling Benefit	(\$254)		E	GRID zero based; 2012 reduction in ST & OT hours-Forecasting & Scheduling Project
17	Field & Office Management & Staff	\$385	5.6%	C	GRID 5 yr avg
18	Non-Shared Total	\$9,917	8.0%		
19					
20	Shared Services				
21	CS Field Training Manager			I	GRID 5 yr avg
22				J	Incremental 2.5 FTE's (labor + NL) to align with 2010 staffing levels
23	Total CS Field Training Manager (2200-0345)	\$183	12.7%		
24	CS South Inland Director (2200-0437)	(\$257)	-100.0%	I	GRID zero based; Director & Admin reduction as result of reorganization in April 2010
25	CS Field Staff Manager			I	GRID 5 yr avg
26				J	Incremental 1.8 FTE's (labor + NL) to align with 2010 staffing levels
27	Total CSF Field Staff Manager (2200-0942)	\$54	2.8%		
28	SDGE Eastem Project Manager (2200-2145)	\$0	0.0%	I	GRID base yr; employee supporting OpEx/not charging home cost center
29	Quality Assurance (2200-2206)	\$120	18.8%	I	GRID 3 yr avg; Quality Assurance Program implemented in 2005 did not reach full staffing levels until late 2006
30	Shared Total	\$100	2.3%		
31					
32	Total	\$10,017	7.8%		
33					

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

A		B					C					D					E					F					G				
1		SCG Customer Service Field																													
2		B. Workload History and Forecast - ERRATA																													
3																															
4																															
5																															
6																															
7		ORDER CATEGORY																													
8		CHANGE OF ACCOUNT																													
9		TURN ON (NOT ENTERED)																													
10		CLOSE (SOFT)																													
11		TOTAL CHANGE OF ACCOUNT																													
12		CREDIT / COLLECTIONS																													
13		48 HOUR (1ST CALL)																													
14		COLLECT / CLOSE (2ND CALL)																													
15		RETURNED CHECK																													
16		TENANT NOTIFICATION																													
17		OTHER																													
18		TOTAL CREDIT / COLLECTIONS																													
19		CSO																													
20		CSO																													
21		CO-TEST																													
22		NO GAS																													
23		SEASONAL OFF																													
24		SEASONAL ON																													
25		TOTAL CSO																													
26		GAS LEAK																													
27		CSO LEAK																													
28		PILOT OUT ONLY																													
29		LEAK INVESTIGATION (STEP 2)																													
30		TOTAL GAS LEAK																													
31		FUMIGATION																													
32		TURN ON																													
33		CLOSE																													
34		TOTAL FUMIGATION																													
35		HBI																													
36		ENTERED																													
37		NOT ENTERED																													
38		TOTAL HBI																													
39		METER WORK (CAPITAL)																													
40		METER SET (TURN ON)																													
41		METER SET (LEFT OFF)																													
42		METER SET (PSI)																													
43		TOTAL METER WORK (CAPITAL)																													

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	C	D	E	F	G
1	SCG Customer Service Field						
2	B. Workload History and Forecast - ERRATA						
3							
4							
5							
6							
7							
44		ORDER CATEGORY					
45		METER WORK (O&M)					
46		METER RESET (TURN ON)	2,745	2,935	2,969	2,666	2,544
47		METER RESET (LEFT OFF)	853	886	840	756	689
48		METER CHANGE (ENTERED)	19,228	15,233	15,739	10,900	11,741
49		METER CHANGE (NOT ENTERED)	160,071	156,935	131,174	139,324	143,908
50		METER CHANGE (SIZE)	16,041	13,046	10,116	6,858	5,066
51		METER REMOVE	7,820	9,228	8,809	6,859	5,325
52		TOTAL METER WORK (O&M)	206,758	198,263	189,647	167,363	169,273
53		NONPAY TURN ON	117,657	128,068	134,333	142,990	110,172
54		TURN ON	117,657	128,068	134,333	142,990	110,172
55		TOTAL NONPAY TURN ON	117,657	128,068	134,333	142,990	110,172
56		READ / VERIFY					
57		VERIFY - SOFT CLOSE	144,096	174,780	91,859	83,685	84,105
58		VERIFY - SOFT CLOSE 180 DAYS	0	-	55,524	66,345	75,890
59		LOAD SURVEY - RES	0	-	31,613	34,936	40,907
60		TOTAL READ / VERIFY	144,096	174,780	127,383	124,966	130,892
61		TURN ON / SHUT OFF	160,749	188,536	189,638	193,106	207,311
62		TURN ON (ENTERED)	128,877	134,653	144,419	165,193	180,320
63		TURN ON (ENTERED GAS ON)	58,357	60,474	57,989	62,798	65,818
64		TURN ON (BACK ON / RESTORE)	55,851	55,657	61,807	60,850	63,236
65		TURN ON (PSI)	926	1,646	2,242	2,278	1,713
66		CLOSE (HARD)	37,444	36,107	33,617	41,883	52,268
67		TOTAL TURN ON / SHUT OFF	281,455	288,537	300,074	333,002	363,355
68		MISCELLANEOUS					
69		SERVICE ORDER (MSO)	29,339	30,817	31,151	27,618	29,144
70		METER AND REG (MMR)	28,404	28,444	44,159	42,243	44,215
71		ASSIST	4,703	8,683	16,115	15,142	15,325
72		RELIANCE K INSPECTION	0	0	0	0	8,365
73		RELIANCE K CHANGE	0	0	0	0	13,554
74		TOTAL MISCELLANEOUS	62,446	67,944	91,425	85,003	110,593
75		OTHER					
76		CUST / COMP ORDER	7	31	4	4	3
77		TOTAL OTHER	7	31	4	4	3
78		FOOD INDUSTRY					
79		TURN ON (ENTERED)	2,311	2,558	2,611	2,747	2,778
80		CSO	64,759	60,304	56,660	55,739	54,773
81		CSO LEAK	11,562	11,942	11,508	10,704	10,162
82		TOTAL FOOD INDUSTRY	78,632	74,804	70,779	69,190	67,733

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	C	D	E	F	G
1	SCG Customer Service Field						
2	B. Workload History and Forecast - ERRATA						
3							
4							
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7							
83		ORDER CATEGORY					
84		COMMERCIAL / INDUSTRIAL					
85		OFF - PREMISE ORDER					
86		ISO	22,455	18,834	13,895	14,054	15,968
87		CSO	25,309	25,924	29,225	25,258	24,070
88		TURN ON	15,011	16,983	21,851	22,368	21,634
89		FGA	0	0	0	0	0
90		LOAD SURVEY I / C	2,438	2,395	2,721	2,361	3,238
91							
92		TOTAL COMMERCIAL / INDUSTRIAL	65,213	64,136	67,692	64,041	64,900
93		ADDITIONAL PROGRAMS					
94		CO TEST (SB 183)	0	0	0	0	0
95			0	0	0	0	0
96			0	0	0	0	0
97		TOTAL ADDITIONAL PROGRAMS	0	0	0	0	0
98		INCOMPLETE ORDERS	283,411	308,963	307,716	300,781	323,982
99							
100		TOTAL	4,276,085	4,237,698	4,132,128	4,188,647	4,318,794
101			ok	ok	ok	ok	ok
102			check				
103		2009 NON-JOB TIME RATE/FORECAST *****					
104							
105		GRAND TOTAL					18.75%
106							
107							
108							
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113							
114		Note: Reduce Meter Work (Capital) by on prem					
115		hours which is forecast by Gas Distribution.					
116		Drive time and non-job time associated with					
117		capital orders is forecast by CSF in O&M					
118		METER WORK (CAPITAL)					
119		METER SET (TURN ON)	63,497	63,912	47,910	32,587	22,473
120		METER SET (LEFT OFF)	10,234	11,898	5,507	4,010	2,346
121		METER SET (PS)	2,682	4,340	5,934	4,846	3,374
122		TOTAL METER WORK (CAPITAL) - ON PREM ONLY	76,413	80,150	59,351	41,443	28,193
123							

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	H	I	J	K	L	M	N	O
1	SCG Customer Service Field									
2	B. Workload History and Forecast - ERRATA									
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

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	SCG Customer Service Field																																					
	B. Workload History and Forecast - ERRATA																																					
	FORECAST ORDERS										ON PREMISE TIME		ON PREMISE + OFF PREMISE TIME																									
	2010					2011					2012					2009	2010	2011	2012																			
	Off-premise time per order -																																					
	2010					2011					2012					2009	2010	2011	2012																			
	Off-premise time per order -																																					
	ORDER CATEGORY																																					
44	METER WORK (O&M)																																					
45	METER RESET (TURN ON)																				79.4	89.8	89.9	90.0	90.1													
46	METER RESET (LEFT OFF)																				68.1	78.5	78.6	78.7	78.8													
47	METER CHANGE (ENTERED)																				49.8	60.2	60.3	60.4	60.5													
48	METER CHANGE (NOT ENTERED)																				31.9	42.3	42.4	42.5	42.6													
49	METER CHANGE (SIZE)																				62.8	73.2	73.3	73.4	73.5													
50	METER REMOVE																				14.9	25.3	25.4	25.5	25.6													
51	TOTAL METER WORK (O&M)																				189,573	190,589	191,604															
52	NONPAY TURN ON																				117,202	124,231	131,261	27.8	38.2	38.3	38.4	38.5										
53	TURN ON																				117,202	124,231	131,261															
54	TOTAL NONPAY TURN ON																				117,202	124,231	131,261															
55	READ / VERIFY																				8.8	19.2	19.3	19.4	19.5													
56	VERIFY - SOFT CLOSE																				7.2	17.6	17.7	17.8	17.9													
57	VERIFY - SOFT CLOSE 180 DAYS																				6.8	17.2	17.3	17.4	17.5													
58	LOAD SURVEY - RES																				42.8	53.2	53.3	53.4	53.5													
59																					8,128	9,848	11,567															
60	TOTAL READ / VERIFY																				207,188	207,065	206,943															
61	TURN ON / SHUT OFF																				35.7	46.1	46.2	46.3	46.4													
62	TURN ON (ENTERED)																				24.8	35.2	35.3	35.4	35.5													
63	TURN ON (ENTERED GAS ON)																				33.3	43.6	43.8	43.9	44.0													
64	TURN ON (BACK ON / RESTORE)																				42.0	52.4	52.5	52.6	52.8													
65	TURN ON (PSI)																				5.1	15.5	15.6	15.7	15.8													
66	CLOSE (HARD)																				326,212	338,593	340,974															
67	TOTAL TURN ON / SHUT OFF																				29,664	30,184	30,704	25.2	35.6	35.7	35.8	35.9										
68	MISCELLANEOUS																				42,409	40,602	38,796	27.1	37.5	37.6	37.7	37.8										
69	SERVICE ORDER (MSO)																				14,346	13,366	12,387	64.8	75.2	75.3	75.4	75.5										
70	METER AND REG (MMR)																				8,355	8,355	8,355	9.7	20.1	20.2	20.3	20.4										
71	ASSIST																				13,554	13,554	13,554	40.7	51.1	51.2	51.3	51.4										
72	RELIANCE K INSPECTION																				108,327	106,061	103,796															
73	RELIANCE K CHANGE																				5	8	8	10	10													
74	TOTAL MISCELLANEOUS																				5	8	8	10	10													
75	OTHER																				5	8	8	10	10													
76	CUST / COMP ORDER																				5	8	8	10	10													
77	TOTAL OTHER																				5	8	8	10	10													
78	FOOD INDUSTRY																				2,750	2,722	2,695	77.9	88.3	88.4	88.5	88.7										
79	TURN ON (ENTERED)																				56,726	58,678	60,631	62.0	72.4	72.5	72.6	72.7										
80	CSO																				10,653	11,124	11,595	48.0	58.4	58.5	58.6	58.7										
81	CSO LEAK																				70,129	72,525	74,920															
82	TOTAL FOOD INDUSTRY																				70,129	72,525	74,920															

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	H	I	J	K	L	M	N	O
1	SCG Customer Service Field									
2	Workload History and Forecast - ERRATA									
3										
4										
5										
6										
7		ORDER CATEGORY	FORECAST ORDERS	ON PREMISE	ON PREMISE + OFF PREMISE TIME	ON PREMISE + OFF PREMISE TIME	ON PREMISE + OFF PREMISE TIME	ON PREMISE + OFF PREMISE TIME	ON PREMISE + OFF PREMISE TIME	ON PREMISE + OFF PREMISE TIME
			2010	2011	2012	2009	2009	2010	2011	2012
			Off-premise increase per year (congestion rate) -		Off-premise time per order -	Off-premise increase per year (congestion rate) -	Off-premise increase per year (congestion rate) -	Off-premise increase per year (congestion rate) -	Off-premise increase per year (congestion rate) -	Off-premise increase per year (congestion rate) -
							10.4	10.5	10.6	10.7
83		COMMERCIAL / INDUSTRIAL								
84		OFF - PREMISE ORDER	0	0	0	-	0.0	0.0	0.0	0.0
85		ISO	16,537	17,117	17,696	84.1	94.5	94.6	94.7	94.8
86		CSO	25,017	25,963	26,910	26.0	36.4	36.5	36.6	36.7
87		TURN ON	21,175	20,716	20,256	37.5	47.9	48.0	48.1	48.2
88		FGA	0	0	0	-	0.0	0.0	0.0	0.0
89		LOAD SURVEY / / C	3,067	2,896	2,725	54.2	64.5	64.7	64.8	64.9
90										
91										
92		TOTAL COMMERCIAL / INDUSTRIAL	65,796	66,692	67,588					
93		ADDITIONAL PROGRAMS								
94		CO TEST (SB 183)	1,859	3,718	5,577	40.1	0.0	50.6	50.7	50.8
95			0	0	0	0.0	0.0	0.0	0.0	0.0
96			0	0	0	0.0	0.0	0.0	0.0	0.0
97		TOTAL ADDITIONAL PROGRAMS	1,859	3,718	5,577					
98		INCOMPLETE ORDERS	321,338	318,693	316,049	8.8	19.2	19.3	19.4	19.5
99										
100		TOTAL	4,366,667	4,395,255	4,423,842					
101			check	ok	ok					
102										
103		2009 NON-JOB TIME RATE/FORECAST								
104										
105		GRAND TOTAL								
106										
107										
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113										
114		Note: Reduce Meter Work (Capital) by on prem								
115		hours which is forecast by Gas Distribution.								
116		Drive time and non-job time associated with								
117		capital orders is forecast by CSF in O&M								
118		METER WORK (CAPITAL)								
119		METER SET (TURN ON)	30,957	39,440	47,924	69.2				
120		METER SET (LEFT OFF)	3,925	5,504	7,083	53.9				
121		METER SET (PSI)	3,711	4,048	4,384	63.2				
122		TOTAL METER WORK (CAPITAL) - ON PREM ONLY	38,592	48,992	59,391	186.3				
123										

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	P	Q	R	S	T	U	V	W	X	Y	Z
1	SCG Customer Service Field												
2	B. Workload History and Forecast - ERRATA												
3													
4													
5													
6													
7													
8	ORDER CATEGORY												
9	CHANGE OF ACCOUNT												
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19	CSO												
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25													
26	GAS LEAK												
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28													
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31	FUMIGATION												
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33													
34													
35	HBI												
36													
37													
38	METER WORK (CAPITAL)												
39													
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41													
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43													

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	P	Q	R	S	T	U	V	W	X	Y	Z
1	SCG Customer Service Field												
2	B. Workload History and Forecast - ERRATA												
3													
4			2009	2010	2011	2012	2009	2010	2011	2012	2010	2011	2012
5			TOTAL HOURS				TOTAL FTEs				DELTA FTEs		
6			2009	2010	2011	2012	2009	2010	2011	2012	2010	2011	2012
7		ORDER CATEGORY											
44		METER WORK (O&M)											
45		METER RESET (TURN ON)	3,808	3,977	4,147	4,317	1.8	1.9	2.0	2.1	0.1	0.1	0.1
46		METER RESET (LEFT OFF)	902	967	1,032	1,097	0.4	0.5	0.5	0.5	0.0	0.0	0.0
47		METER CHANGE (ENTERED)	11,787	15,764	15,621	15,478	5.6	7.5	7.5	7.4	1.9	0.0	-0.1
48		METER CHANGE (NOT ENTERED)	101,488	111,275	110,350	109,419	48.6	53.3	53.1	52.4	4.7	-0.2	-0.6
49		METER CHANGE (SIZE)	6,179	8,458	10,743	13,035	3.0	4.1	5.2	6.2	1.1	1.1	1.1
50		METER REMOVE	2,247	2,619	2,894	3,372	1.1	1.3	1.4	1.6	0.2	0.2	0.2
51		TOTAL METER WORK (O&M)	126,410	143,060	144,888	146,719	60.5	68.5	69.7	70.3	8.0	1.1	0.6
52		NONPAY TURN ON											
53		TURN ON	70,062	74,735	79,433	84,155	33.6	35.8	38.2	40.3	2.2	2.4	2.1
54		TOTAL NONPAY TURN ON	70,062	74,735	79,433	84,155	33.6	35.8	38.2	40.3	2.2	2.4	2.1
55		READ / VERIFY											
56		VERIFY	26,901	27,576	28,256	28,943	12.9	13.2	13.6	13.9	0.3	0.4	0.3
57		VERIFY - SOFT CLOSE	22,261	21,764	21,259	20,747	10.7	10.4	10.2	9.9	-0.2	-0.2	-0.3
58		VERIFY - SOFT CLOSE 180 DAYS	11,698	11,378	11,054	10,725	5.6	5.4	5.3	5.1	-0.2	-0.1	-0.2
59		LOAD SURVEY - RES	5,681	7,219	8,763	10,313	2.7	3.5	4.2	4.9	0.7	0.8	0.7
60		TOTAL READ / VERIFY	66,540	67,937	69,332	70,728	31.9	32.5	33.3	33.9	0.7	0.8	0.5
61		TURN ON / SHUT OFF											
62		TURN ON (ENTERED)	138,418	132,942	127,440	121,912	66.3	63.7	61.3	58.4	-2.6	-2.4	-2.9
63		TURN ON (ENTERED GAS ON)	38,572	38,194	37,814	37,430	18.5	18.3	18.2	17.9	-0.2	-0.1	-0.3
64		TURN ON (BACK ON / RESTORE)	46,001	45,721	45,439	45,155	22.0	21.9	21.8	21.6	-0.1	-0.1	-0.2
65		TURN ON (PSI)	1,497	1,532	1,566	1,601	0.7	0.7	0.8	0.8	0.0	0.0	0.0
66		CLOSE (HARD)	13,528	12,701	11,861	11,010	6.5	6.1	5.7	5.3	-0.4	-0.4	-0.4
67		TOTAL TURN ON / SHUT OFF	238,017	231,090	224,121	217,108	114.0	110.7	107.8	104.0	-3.3	-2.9	-3.8
68		MISCELLANEOUS											
69		SERVICE ORDER (MSO)	17,283	17,643	18,005	18,368	8.3	8.4	8.7	8.8	0.2	0.2	0.1
70		METER AND REG (MMR)	27,631	26,576	25,514	24,446	13.2	12.7	12.3	11.7	-0.5	-0.5	-0.6
71		ASSIST	19,200	17,998	16,792	15,583	9.2	8.6	8.1	7.5	-0.6	-0.5	-0.6
72		RELIANC K INSPECTION	2,799	2,814	2,828	2,843	1.3	1.3	1.4	1.4	0.0	0.0	0.0
73		RELIANC K CHANGE	11,539	11,563	11,586	11,610	5.5	5.5	5.6	5.6	0.0	0.0	0.0
74		TOTAL MISCELLANEOUS	78,453	76,593	74,726	72,850	37.6	36.7	35.9	34.9	-0.9	-0.8	-1.0
75		OTHER											
76		CUST / COMP ORDER	3	6	9	12	0.0	0.0	0.0	0.0	0.0	0.0	0.0
77		TOTAL OTHER	3	6	9	12	0.0	0.0	0.0	0.0	0.0	0.0	0.0
78		FOOD INDUSTRY											
79		TURN ON (ENTERED)	4,090	4,054	4,018	3,982	2.0	1.9	1.9	1.9	0.0	0.0	0.0
80		CSO	66,122	68,577	71,040	73,509	31.7	32.8	34.2	35.2	1.2	1.3	1.1
81		CSO LEAK	9,906	10,383	10,861	11,341	4.7	5.0	5.2	5.4	0.2	0.2	0.2
82		TOTAL FOOD INDUSTRY	80,119	83,015	85,919	88,831	38.4	39.8	41.3	42.5	1.4	1.5	1.2

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	P	Q	R	S	T	U	V	W	X	Y	Z
1	SCG Customer Service Field												
2	B. Workload History and Forecast - ERRATA												
3													
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7													
83	ORDER CATEGORY												
84	COMMERCIAL / INDUSTRIAL												
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114	Note: Reduce Meter Work (Capital) by on prem												
115	hours which is forecast by Gas Distribution.												
116	Drive time and non-job time associated with												
117	capital orders is forecast by CSF in O&M												
118	METER WORK (CAPITAL)												
119													
120													
121													
122													
123													

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	AA	AB	AC	AD	AE	AF	AG
1	SCG Customer Service Field								
2	B. Workload History and Forecast - ERRATA								
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8	ORDER CATEGORY								
9	CHANGE OF ACCOUNT								
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

	A	B	AA	AB	AC	AD	AE	AF	AG
1		SCG Customer Service Field							
2		B. Workload History and Forecast - ERRATA							
3									
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5									
6									
7		ORDER CATEGORY							
44		METER WORK (O&M)							
45		METER RESET (TURN ON)	\$129,708	\$135,205	\$140,973	\$146,754	\$5,497	\$5,768	\$5,781
46		METER RESET (LEFT OFF)	\$30,718	\$32,864	\$35,077	\$37,296	\$2,146	\$2,213	\$2,219
47		METER CHANGE (ENTERED)	\$401,490	\$535,884	\$631,042	\$626,180	\$134,394	(\$4,842)	(\$4,862)
48		METER CHANGE (NOT ENTERED)	\$3,456,913	\$3,782,748	\$3,751,291	\$3,719,635	\$325,835	(\$31,457)	(\$31,656)
49		METER CHANGE (SIZE)	\$210,467	\$287,523	\$365,218	\$443,131	\$77,056	\$77,694	\$77,913
50		METER REMOVE	\$76,531	\$89,031	\$101,784	\$114,639	\$12,500	\$12,753	\$12,854
51		TOTAL METER WORK (O&M)	\$4,305,827	\$4,863,256	\$4,925,386	\$4,987,635	\$557,429	\$62,130	\$62,250
52		NONPAY TURN ON	\$2,386,465	\$2,540,582	\$2,700,278	\$2,860,803	\$154,116	\$159,697	\$160,525
53		TURN ON	\$2,386,465	\$2,540,582	\$2,700,278	\$2,860,803	\$154,116	\$159,697	\$160,525
54		TOTAL NONPAY TURN ON	\$2,386,465	\$2,540,582	\$2,700,278	\$2,860,803	\$154,116	\$159,697	\$160,525
55		READ / VERIFY							
56		VERIFY	\$916,315	\$937,430	\$960,564	\$983,891	\$21,115	\$23,134	\$23,327
57		VERIFY - SOFT CLOSE	\$758,260	\$739,847	\$722,692	\$705,287	(\$18,413)	(\$17,154)	(\$17,405)
58		VERIFY - SOFT CLOSE 180 DAYS	\$398,460	\$386,794	\$375,773	\$364,591	(\$11,666)	(\$11,022)	(\$11,182)
59		LOAD SURVEY - RES	\$193,497	\$245,397	\$297,865	\$350,575	\$51,900	\$52,488	\$52,690
60		TOTAL READ / VERIFY	\$2,266,522	\$2,309,468	\$2,336,913	\$2,404,344	\$42,946	\$47,445	\$47,431
61		TURN ON / SHUT OFF							
62		TURN ON (ENTERED)	\$4,714,851	\$4,519,304	\$4,332,259	\$4,144,329	(\$195,548)	(\$187,044)	(\$187,930)
63		TURN ON (ENTERED GAS ON)	\$1,313,859	\$1,296,396	\$1,285,450	\$1,272,406	(\$15,463)	(\$12,945)	(\$13,044)
64		TURN ON (BACK ON / RESTORE)	\$1,566,917	\$1,554,268	\$1,544,676	\$1,535,021	(\$12,649)	(\$9,592)	(\$9,655)
65		TURN ON (PSI)	\$50,997	\$52,071	\$53,250	\$54,433	\$1,073	\$1,179	\$1,183
66		CLOSE (HARD)	\$460,785	\$431,752	\$403,223	\$374,278	(\$29,033)	(\$28,530)	(\$28,944)
67		TOTAL TURN ON / SHUT OFF	\$8,107,410	\$7,855,791	\$7,618,858	\$7,380,468	(\$251,620)	(\$236,932)	(\$238,390)
68		MISCELLANEOUS							
69		SERVICE ORDER (MSO)	\$688,711	\$599,767	\$612,057	\$624,407	\$11,056	\$12,289	\$12,351
70		METER AND REG (MMR)	\$941,181	\$903,430	\$867,341	\$831,040	(\$37,750)	(\$36,089)	(\$36,302)
71		ASSIST	\$653,995	\$611,825	\$570,842	\$529,744	(\$42,170)	(\$40,983)	(\$41,098)
72		RELIANCE K INSPECTION	\$95,348	\$95,650	\$96,142	\$96,633	\$302	\$492	\$492
73		RELIANCE K CHANGE	\$393,060	\$393,075	\$393,873	\$394,671	\$15	\$798	\$798
74		TOTAL MISCELLANEOUS	\$2,672,295	\$2,603,747	\$2,540,255	\$2,476,496	(\$68,547)	(\$63,492)	(\$63,759)
75		OTHER							
76		CUST / COMP ORDER	\$115	\$208	\$300	\$393	\$92	\$93	\$93
77		TOTAL OTHER	\$115	\$208	\$300	\$393	\$92	\$93	\$93
78		FOOD INDUSTRY							
79		TURN ON (ENTERED)	\$139,321	\$137,815	\$136,584	\$135,349	(\$1,506)	(\$1,231)	(\$1,235)
80		CSO	\$2,252,267	\$2,331,254	\$2,414,956	\$2,498,889	\$78,987	\$83,702	\$83,932
81		CSO LEAK	\$337,437	\$352,968	\$369,226	\$385,540	\$15,531	\$16,258	\$16,314
82		TOTAL FOOD INDUSTRY	\$2,729,025	\$2,822,037	\$2,920,766	\$3,019,778	\$93,012	\$98,729	\$99,011

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

	A	B	AA	AB	AC	AD	AE	AF	AG
1	SCG Customer Service Field								
2	B. Workload History and Forecast - ERRATA								
3									
4			TOTAL \$		2011		2010		2012
5			2009	2010	2011	2012		DELTA \$	2012
6								2011	
7	ORDER CATEGORY								
83	COMMERCIAL / INDUSTRIAL								
84			\$0	\$0	\$0	\$0	\$0	\$0	\$0
85			\$865,735	\$866,018	\$918,073	\$950,196	\$30,283	\$32,055	\$32,123
86			\$497,553	\$517,562	\$538,673	\$559,896	\$20,009	\$21,111	\$21,223
87			\$588,567	\$576,174	\$564,899	\$553,570	(\$12,393)	(\$11,275)	(\$11,329)
88			\$0	\$0	\$0	\$0	\$0	\$0	\$0
89			\$118,654	\$112,347	\$106,256	\$100,145	(\$6,307)	(\$6,091)	(\$6,111)
90									
91									
92			\$2,060,510	\$2,092,101	\$2,127,901	\$2,163,807	\$31,591	\$35,800	\$35,906
93	TOTAL COMMERCIAL / INDUSTRIAL								
94			\$0	\$53,341	\$106,900	\$160,679	\$53,341	\$53,560	\$53,779
95			\$0	\$0	\$0	\$0	\$0	\$0	\$0
96			\$0	\$0	\$0	\$0	\$0	\$0	\$0
97			\$0	\$53,341	\$106,900	\$160,679	\$53,341	\$53,560	\$53,779
98			\$3,528,928	\$3,512,074	\$3,501,936	\$3,491,487	(\$16,854)	(\$10,138)	(\$10,449)
99									
100			\$63,765,599	\$65,664,719	\$67,190,198	\$68,719,044	\$1,899,120	\$1,525,479	\$1,528,846
101									
102									
103			\$11,957,963	\$12,314,105	\$12,600,178	\$12,886,883	\$356,142	\$286,073	\$286,704
104			\$75,723,562	\$77,978,824	\$79,790,376	\$81,605,926	\$2,255,262	\$1,811,552	\$1,815,550
105			\$74,376,276	2009 O&M (less 08 retropay & 879040 lrg)	\$79,790,376	\$81,605,926	\$2,255,262	\$1,811,552	\$1,815,550
106			\$1,346,975	2009 capital (on-prem only)					
107			\$75,723,251	2009 total					
108			\$311						
109			0.0004%	delta (model vs recorded)					
110									
111									
112									
113									
114	Note: Reduce Meter Work (Capital) by on prem								
115	hours which is forecast by Gas Distribution.								
116	Drive time and non-job time associated with								
117	capital orders is forecast by CSF in O&M								
118	METER WORK (CAPITAL)								
119			\$882,523	\$1,213,256	\$1,545,747	\$1,876,237	\$330,733	\$332,490	\$332,490
120			\$71,770	\$119,832	\$168,037	\$216,242	\$48,062	\$48,205	\$48,205
121			\$121,128	\$132,954	\$145,020	\$157,087	\$11,826	\$12,067	\$12,067
122			\$1,075,421	\$1,466,041	\$1,858,804	\$2,251,566	\$390,621	\$392,762	\$392,762
123									
								3 Year Change	7.8%

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

SCG Customer Service Field
C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data - ERRATA

Year	Historical					Forecast			5 Yr. Avg	Change BY to TY
	2005	2006	2007	2008	2009	2010	2011	2012		
Paid Days	260	260	261	262	261	261	260	261		
Paid Hours	2080	2080	2088	2096	2088	2088	2080	2088		
Total Orders	4,276,085	4,237,898	4,132,128	4,188,647	4,318,794	4,368,667	4,395,255	4,423,842		
O&M Orders	4,199,672	4,157,948	4,072,777	4,147,204	4,290,601	4,328,075	4,346,263	4,364,452		
Capital Orders	76,413	80,150	59,351	41,443	28,193	38,592	48,992	59,391		
Labor Escalation Rate	0.8933	0.9190	0.9436	0.9753	1.0000					
Non-labor Escalation Rate	0.8907	0.9232	0.9541	1.0025	1.0000					
Vacation & Sick Factor - \$'s	0.1705	0.1787	0.1745	0.1927	0.1807					
Vacation & Sick Factor - FTE's	0.1804	0.1832	0.1821	0.1977	0.1891					
2FO000.000 CSF Operations Labor - Orders										
Labor \$'s	2005	2006	2007	2008	2009	Forecast			Change BY to TY	
Recorded Adjusted - In Nominal \$'s (without V&S)	\$65,258,398	\$68,038,720	\$70,376,791	\$69,809,320	\$75,255,548					
2008 Union Retropay Paid In 2009				\$857,554	(\$879,272)					
Recorded Adjusted - In 2009 \$'s (without V&S)	\$73,053,172	\$74,035,604	\$74,583,288	\$72,456,551	\$74,376,276					
Vacation & Sick (V&S)	\$12,455,566	\$13,230,162	\$13,014,784	\$13,962,377	\$13,439,793					
Total - In 2009 \$'s (with V&S)	\$85,508,738	\$87,265,766	\$87,598,072	\$86,418,929	\$87,816,069	\$90,338,643	\$92,013,808	\$93,693,693	\$5,877,624	
Incremental Change		\$1,757,028	\$332,306	(\$1,179,144)	\$1,397,140					
Wage Rate - In Nominal \$'s	\$29.71	\$30.68	\$31.85	\$32.69	\$34.08	\$2,522,574	\$1,675,165	\$1,679,885		
Wage Rate - In 2009 \$'s	\$33.26	\$33.39	\$33.76	\$33.52	\$34.08					
FTE's										
Recorded Adjusted Hours (without V&S)	2,196,539	2,217,611	2,209,508	2,161,859	2,182,338					
Recorded Adjusted FTE's (without V&S)	1,056	1,066	1,058	1,031	1,045					
Vacation & Sick (V&S)	191	195	193	204	198					
Total FTE's (with V&S)	1,247	1,261	1,251	1,235	1,243	1,247	1,282	1,311	1,329	87
Incremental Change		15	(11)	(16)	7	39	29	19		
2FO000.000 CSF Operations Labor - Training										
Labor \$'s	2005	2006	2007	2008	2009	Forecast			Change BY to TY	
Recorded Adjusted - In Nominal \$'s (without V&S)	\$4,479,089	\$4,622,144	\$4,980,029	\$3,816,642	\$3,539,175					
Recorded Adjusted - In 2009 \$'s (without V&S)	\$5,014,092	\$5,029,537	\$5,277,691	\$3,913,300	\$3,539,175					
Vacation & Sick (V&S)	\$854,903	\$898,778	\$920,957	\$754,093	\$639,529					
Total - In 2009 \$'s (with V&S)	\$5,868,995	\$5,928,315	\$6,198,648	\$4,667,393	\$4,178,704	\$5,702,917	\$5,808,668	\$5,914,716	\$1,736,012	
Incremental Change		\$59,320	\$270,333	(\$1,531,255)	(\$488,689)					
Wage Rate - In Nominal \$'s	\$27.30	\$28.08	\$29.12	\$30.26	\$31.73	\$1,524,213	\$1,005,750	\$1,06,048		
Wage Rate - In 2009 \$'s	\$30.56	\$30.55	\$30.86	\$31.02	\$31.73					
FTE's										
Recorded Adjusted Hours (without V&S)	164,054	164,613	171,021	126,134	111,539					
Recorded Adjusted FTE's (without V&S)	79	79	82	60	53					
Vacation & Sick (V&S)	14	14	15	12	10					
Total FTE's (with V&S)	93	94	97	72	64	84	86	88	89	26
Incremental Change		1	3	(25)	(9)	23	2	1		
Training Rate	7.5%	7.4%	7.7%	5.8%	5.1%	6.7%				

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

SCG Customer Service Field
C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data - ERRATA

	2FO000.000 CSF Operations Non-labor				5 Yr. Avg	Forecast	Change BY to TY
	2005	2006	2007	2009			
Recorded Adjusted - In Nominal \$'s	\$6,749,619	\$5,913,131	\$5,428,306	\$6,456,497	\$6,065,723		
Recorded Adjusted - In 2009 \$'s	\$7,577,881	\$6,405,038	\$5,689,452	\$6,440,396	\$6,065,723	\$6,612,702	\$6,856,288
Incremental Change		(\$1,172,844)	(\$715,586)	\$750,944	(\$374,673)	\$546,979	\$97,061
Non-labor \$/s Per CSF FTE - In 2009 \$'s	\$5,657	\$4,727	\$4,222	\$4,926	\$4,643		

	2FO002.000 CSF Support Labor - Direct Supervision				5 Yr. Avg	Forecast	Change BY to TY
	2005	2006	2007	2009			
Labor \$'s	\$5,892,229	\$6,472,160	\$7,221,968	\$7,546,432	\$7,907,855		
Recorded Adjusted - In Nominal \$'s (without V&S)	\$6,586,025	\$7,042,612	\$7,653,633	\$7,737,549	\$7,907,855		
Recorded Adjusted - In 2009 \$'s (without V&S)	\$1,124,622	\$1,258,515	\$1,335,559	\$1,491,026	\$1,428,949	\$9,917,420	\$10,325,816
Total - In 2009 \$'s (with V&S)	\$7,720,647	\$8,301,126	\$8,989,192	\$9,228,575	\$9,336,804	\$580,615	\$253,441
Incremental Change	\$680,479	\$688,066	\$239,383	\$108,229	\$40,59		
Wage Rate - In Nominal \$'s	\$34.21	\$36.01	\$37.39	\$38.67	\$40.59		
Wage Rate - In 2009 \$'s	\$38.30	\$39.19	\$39.63	\$39.65	\$40.59		
FTE's	172,224	179,712	193,140	195,138	194,810		
Recorded Adjusted Hours (without V&S)	83	86	93	93	93		
Recorded Adjusted FTE's (without V&S)	15	16	17	18	18		
Vacation & Sick (V&S)	98	102	109	112	111	117	120
Total FTE's (with V&S)	4	7	2	(1)	6	3	1
Incremental Change	14	13	12	12	12		
Employee to Supervisor Ratio							

	2FO002.000 CSF Support Non-labor - Direct Supervision				5 Yr. Avg	Forecast	Change BY to TY
	2005	2006	2007	2009			
Labor \$'s	\$954,022	\$987,817	\$972,209	\$994,093	\$1,080,551		
Recorded Adjusted - In Nominal \$'s	\$1,071,092	\$1,069,992	\$1,018,980	\$991,614	\$1,080,551	\$1,046,446	\$1,198,725
Recorded Adjusted - In 2009 \$'s		(\$1,100)	(\$27,366)	\$88,937	\$88,937	\$70,763	\$33,963
Incremental Change							
Non-labor \$/s Per CSF FTE - In 2009 \$'s	\$10,959	\$10,467	\$9,319	\$8,893	\$9,740		

	2FO001.000 CS Dispatch Labor				5 Yr. Avg	Forecast	Change BY to TY
	2005	2006	2007	2009			
Labor \$'s	\$6,267,082	\$6,534,905	\$6,750,600	\$6,667,694	\$6,831,052		
Recorded Adjusted - In Nominal \$'s (without V&S)	\$7,015,652	\$7,110,887	\$7,154,091	\$6,836,557	\$6,831,052		
Recorded Adjusted - In 2009 \$'s (without V&S)	\$1,196,169	\$1,270,715	\$1,248,389	\$1,317,405	\$1,234,371		
Vacation & Sick (V&S)	\$8,211,621	\$8,381,602	\$8,402,480	\$8,153,962	\$8,065,424	\$8,243,058	\$8,243,058
Total - In 2009 \$'s (with V&S)		\$169,782	\$20,877	(\$248,518)	(\$88,538)	\$0	\$0
Incremental Change							
FTE's	202,592	203,216	202,536	194,928	191,470		
Recorded Adjusted Hours (without V&S)	97	96	97	93	92		
Recorded Adjusted FTE's (without V&S)	18	18	18	17	17		
Vacation & Sick (V&S)	115	116	115	111	109	113	113
Total FTE's (with V&S)	1	(1)	(3)	(2)	4	0	0
Incremental Change							

	2FO001.000 CS Dispatch Non-labor				5 Yr. Avg	Forecast	Change BY to TY
	2005	2006	2007	2009			
Labor \$'s	\$382,430	\$372,719	\$312,838	\$292,959	\$197,801		
Recorded Adjusted - In Nominal \$'s	\$429,359	\$403,725	\$327,888	\$292,228	\$197,801	\$330,200	\$330,200
Recorded Adjusted - In 2009 \$'s		(\$25,634)	(\$75,837)	(\$35,660)	(\$54,427)	\$0	\$0
Incremental Change							
Non-labor \$/s Per FTE - In 2009 \$'s	\$3,734	\$3,492	\$2,860	\$2,624	\$1,814		

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG Customer Service Field
 C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data - ERRATA

	2FO003.000 CS Staff Labor			Historical			5 Yr. Avg	Forecast		Change BY to TY
	2005	2006	2007	2008	2009	Forecast		Forecast		
Recorded Adjusted - In Nominal \$'s (without V&S)	\$5,118,213	\$5,651,527	\$5,421,968	\$5,363,871	\$5,430,599					
Recorded Adjusted - In 2009 \$'s (without V&S)	\$5,729,557	\$6,149,649	\$5,746,045	\$5,499,714	\$5,430,599					
Vacation & Sick (V&S)	\$976,889	\$1,098,942	\$1,002,685	\$1,059,795	\$981,309					
Total - In 2009 \$'s (with V&S)	\$6,706,446	\$7,248,591	\$6,748,730	\$6,559,509	\$6,411,908		\$6,735,037	\$6,735,037	\$323,128	
Incremental Change	\$542,145	(\$499,861)		(\$189,221)	(\$147,601)		\$0	\$0	\$0	
FTE's										
Recorded Adjusted Hours (without V&S)	186,400	178,672	161,820	157,829	153,468					
Recorded Adjusted FTE's (without V&S)	80	86	78	75	74					
Vacation & Sick (V&S)	14	16	14	15	14					
Total FTE's (with V&S)	94	102	92	90	87		93	93	93	
Incremental Change		7	(10)	(1)	(3)		6	0	0	
2FO003.000 Staff Non-labor										
Recorded Adjusted - In Nominal \$'s	\$612,384	\$392,258	\$388,653	\$387,209	\$399,490					
Recorded Adjusted - In 2009 \$'s	\$687,531	\$424,890	\$407,350	\$386,243	\$399,490		\$461,101	\$461,101	\$61,611	
Incremental Change		(\$262,642)	(\$17,539)	(\$21,107)	\$13,247		\$61,611	\$0	\$0	
Non-labor \$/s Per FTE - In 2009 \$'s	\$7,281	\$4,180	\$4,446	\$4,283	\$4,571		\$4,955			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG Customer Service Field
 D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast

SCAQMD Rule	Gas Engine & Boiler Assessment - Inspection, Maintenance & Tune-Up				Rule 1110.2 Gas Engines > 50 BHP	Gas Quality Rule 433 Natural Gas Quality
	Rule 1146 Boilers > 5MM	Rule 1146.1 Boilers > 2MM < 5MM	Rule 1146.2 Boilers > 400K < 2MM	Miscellaneous Sources		
Market Penetration Rate	20%	20%	15%	25%	10%	Est'd # of C&I Equipment to Monitor
Assumption	Boiler Certification Failures Leading to FGA Tune-Ups	Boiler Certification Failures Leading to FGA Tune-Ups	Inspection and Tune-Up	FGA Tune-Ups for Compliance	Engine Certification Failures Leading to FGA Tune-Ups	Various Gas Equipment (Boilers, Turbines, Engines)
Labor Requirements						
Appliance Count	1,500	1,150	23,000	5,000	870	Thousands
Total Annual FGAs	1,800	920	3,450	1,250	1,218	200
In Minutes						
On-Premise Time	150	150	150	150	150	240
Off-Premise Time	30	30	30	30	30	30
Minutes Per FGA	180	180	180	180	180	270
In Hours						
Hours Per FGA	3.0	3.0	3.0	3.0	3.0	4.5
Total On-The-Job Hours	5,400	2,760	10,350	3,750	3,664	900
Miscellaneous Time	0.2176	601	2,252	816	795	196
Training	0.067	442	846	307	299	74
Vacation & Sick (FTE)	0.1891	1,327	2,543	921	898	221
Total Hours	8,343	4,264	15,992	5,794	5,646	1,391
Annual Hours	2,088	2,088	2,088	2,088	2,088	2,088
Total IST FTE's	4.0	2.0	7.7	2.8	2.7	0.7
IST Wage Rate	\$38.95	\$38.95	\$38.95	\$38.95	\$38.95	\$38.95
Labor Costs	\$324,976	\$166,099	\$622,871	\$225,678	\$219,901	\$54,163

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG Customer Service Field
 D. SCAQMD Rules Change - Industrial Service Technicians (IST) Forecast

	One Time Costs	On-going Annual Costs
Non-labor Requirements		
Crystal Gauges 30#, 300# (per IST)	\$ 1,800	\$35,715
Testo Digital Manometer Kit (per IST)	\$ 872	\$17,302
Testo Sensor Replacement (annually)	\$ 21,240	
Verizon HTC TouchPro2 Cell Phone (per IST)	\$ 227	\$21,240
Cell Phone Mo/Annual Fees (\$93.50 mo x 12 per IST)	\$ 1,122	\$22,263
Small Hand Tool (per IST)	\$ 2,745	\$54,466
Canon IP PIXMA IP100 Photo Printer (per IST)	\$ 228	\$4,524
Miscellaneous (materials, uniforms, etc. - per IST)	\$ 4,834	\$95,922
Non-labor Costs	\$116,511	\$139,425
Capital Budget Code 725 Gas Distribution Capital Tools	Total	
Flue Gas Analyzer (per IST)	\$ 11,000	\$220,000

Summary of SCAQMD Rules Changes O&M Forecast - IST Labor & Non-labor Costs

	2010	2011	2012
Labor	\$806,844	\$1,613,688	\$1,613,688
Non-labor	\$127,968	\$197,680	\$139,425
Total	\$934,812	\$1,811,368	\$1,753,112
FTE's	9.9	19.8	19.8
		Incremental Change By Year	
Labor	\$806,844	\$806,844	\$0
Non-labor	\$127,968	\$69,712	(\$58,256)
Total	\$934,812	\$876,556	(\$58,256)
FTE's	9.9	9.9	0

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG Customer Service Field
 E. Benefits -Forecasting & Scheduling Project and Customer Service Field Operating Efficiencies (CSFOE) Project - ERRATA

Forecasting & Scheduling Project In 2009 \$000's		Labor	NonLabor	Total	FTE	Hours 2088	2009 Hourly Rate	Forecasting & Scheduling Benefit Hours	Annual Benefit-2012 Labor \$'s	FTEs
2FO001.000 DISPATCH										
SAL-UNION S/T	\$ 4,531,309.00	\$ -	\$ 4,531,309.00	66.8	139,478	\$ 32.49	6,240	\$ (202,722)	-3.0	
SAL-UNION O/T	\$ 708,926.00	\$ -	\$ 708,926.00	6.9	14,407	\$ 49.21	1,040	\$ (51,175)	-0.5	
2FO000.000 CUSTOMER SERVICE FIELD										
SAL-UNION O/T						\$ 50.10	8320	\$ (416,832)	-4.0	
NET BENEFIT									\$ (670,729)	-7.5

* Labor rates based on GRID 2009 recorded labor \$'s

CSFOE Project In 2009 \$000's	Annual Benefit - Years 2010 through 2012 ** Labor
2FO000.000 FIELD OPERATIONS	\$ (319,000) \$ - \$ (319,000) -4.0

** Estimated benefit taken from CSFOE Project business case; shown in direct costs for GRC forecast

SCG Customer Service Field
 F. Field Force/Supervisor Enablement Initiative (OpEx Project) - Ongoing Air Card Expense

	2010	2011	2012
Monthly Air Card Fee	\$ 47.00	\$ 35.00	\$ 33.25
Annual Air Card Fee	\$ 564.00	\$ 420.00	\$ 399.00
Forecast Supervisor FTE	117	120	122
Incremental Cost	\$ 65,993	\$ 50,594	\$ 48,609

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SCG Customer Service Field
 G-Data Analysis Reporting Tool (DART) Report - Non-Job Time (NJT)

Off Production Analysis - Summary
 System

Date Range: Thu 1/1/2009 - Thu 12/31/2009

Classification	Total Hours Worked		Standby		Meeting - 879.040		Training - 879.040		Miscellaneous		Other		Total Off Production	
	Hours	%	Hours	%	Hours	%	Hours	%	Hours	%	Hours	%	Hours	%
Energy Tech Residential	44,312	2.69%	39,036	2.37%	2,266	0.14%	35,913	2.18%	19,205	1.17%	140,731	8.55%		
Field Collector	25	0.02%	3,605	2.30%	267	0.17%	4,005	2.55%	700	0.45%	8,601	5.48%		
Field Service Assistant	125	0.05%	6,996	2.80%	877	0.35%	5,536	2.21%	3,105	1.24%	16,639	6.65%		
Commercial Service Tech	135	0.08%	3,606	2.25%	1,327	0.83%	3,689	2.30%	1,182	0.74%	9,939	6.19%		
Industrial Service Tech	1	0.00%	2,356	3.06%	889	1.15%	2,771	3.60%	2,069	2.69%	8,085	10.51%		
System Total	44,598	1.95%	55,598	2.43%	5,625	0.25%	51,914	2.27%	26,261	1.15%	185,995	8.03%		
Adjustments -														
1) Adjustment to tie to recorded hours *														
2) Adjustment to "Other" in order to reverse hours recorded in 892.005 Anodeless Riser Program; these hours are embedded in on-premise time per order														
Adjusted System Total	44,598	1.94%	55,598	2.42%	55,941	2.44%	51,914	2.26%	16,108	0.70%	224,159	9.77%		

* Hours in the DART Off Production Analysis Report are extracted from PACER, the system that records activities performed by CS field. Adjustments have been made to "Total Hours Worked" in order to align the PACER hours with the actual recorded hours reflected in the payroll system. Adjustments made to "Training" are for hours charged to formalized training that are not documented in PACER.

Note: Total Off Production time shown on this report does not include morning and evening setup and shutdown time (AM/PM-34 minutes per FTE per work day) and does not include lunch breaks (30 minutes per FTE per work day)

Non-Job Time Loader Calculation		2009 Hours	
Type	Hours	Type	Hours
Standby	44,598	Standby	44,598
Miscellaneous	51,914	Miscellaneous	51,914
Other	16,108	Other	16,108
AM/PM	132,602	AM/PM	132,602
Breaks	117,002	Breaks	117,002
Total NJT Hours	362,224	Total NJT Hours	362,224
NJT %	15.79%	NJT %	15.79%
Productive %	84.21%	Productive %	84.21%
Total	100%	Total	100%
NJT Rate Per Productive FTE	18.75%	NJT Rate Per Productive FTE	18.75%

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SCG Customer Service Field
 H-Labor Rate Calculation

2009 Straight-time Rate					
Account	Classification	FTE	Rate	Total	
879.010	FSA, ETA, ETR	739	\$31.94	\$49,278,977	
879.020	CST	70	\$33.85	\$4,956,199	
879.030	IST	37	\$38.26	\$2,955,935	
Other	All other accounts (less Training 879040)	5	\$31.72	\$341,767	
903.105	Field Collections	77	\$28.52	\$4,600,027	
Capital-New Business	FSA, ETA, ETR	17	\$31.12	\$1,128,028	
Total		946		\$63,260,934	\$32.04

Blended CSF Straight-time Labor Rate (less Training 879040)

2009 Over-time Rate					
Account	Classification	FTE	Rate	Total	
879.010	FSA, ETA, ETR	110	\$50.10	\$11,558,852	
879.020	CST	4	\$50.52	\$462,606	
879.030	IST	1	\$57.38	\$166,692	
Other	All other accounts (less Training 879040)	1	\$52.89	\$55,220	
903.105	Field Collections	-	\$0.00	\$0.00	
Capital-New Business	FSA, ETA, ETR	2	\$47.64	\$218,947	
Total		119		\$12,462,317	\$50.17

Blended CSF Over-time Labor Rate (less Training 879040)

2009 Combined Rate					
Account	Classification	FTE	Rate	Total	
879.010	FSA, ETA, ETR	849	\$34.31	\$60,837,829	
879.020	CST	75	\$34.83	\$5,418,805	
879.030	IST	38	\$38.95	\$3,122,627	
Other	All other accounts (less Training 879040)	6	\$33.59	\$396,987	
903.105	Field Collections	77	\$28.52	\$4,600,027	
Capital-New Business	FSA, ETA, ETR	20	\$32.98	\$1,346,975	
Total		1,065		\$75,723,251	\$34.06

Combined CSF Labor Rate (less Training 879040)

5 Year Average - Straight-time/Over-time Ratio

Straight-time %	89%	\$32.04	\$28.58
Over-time %	11%	\$50.17	\$5.42
Forecast Wage Rate			\$33.99

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SCG Customer Service Field I. Customer Service Field Operations USS Cost Centers - Forecast Methodology (100% Incurred Level)																		
Description	Functional Area	WorkPaper	Cost Element	Base Year				Forecast Methodology			Other 2010 Only							
				2010	2011	2012	3 Year Average 2010-2011-2012	5 Year Average 2010-2011-2012	2012									
Yr1 Adj:Rec	Yr2 Adj:Rec	Yr3 Adj:Rec	Yr4 Adj:Rec	2005	2006	2007	2008	2010	2011	2012	2010	2011	2012	2010	2011	2012		
CS Training Manager																		
	CSFC	2200-0345.000	Labor	1,137	1,222	1,381	1,299				1,276	1,276	1,276					
	CSFC	2200-0345.000	NLbr	291	160	99	107				149	149	149					
	CSFC	2200-0345.000	NSE	0	0	0	0				0	0	0					
	CSFC	2200-0345.000	Total	1,428	1,382	1,480	1,406				1,425	1,425	1,425					
	CSFC	2200-0345.000	FTE	14.8	15.6	18.1	17				16.5	16.5	16.5					
South Inland Director																		
	CSFC	2200-0437.000	Labor	55	213	212	192										63	
	CSFC	2200-0437.000	NLbr	66	38	24	30										12	
	CSFC	2200-0437.000	NSE	0	0	0	0										0	
	CSFC	2200-0437.000	Total	121	251	236	222										75	
	CSFC	2200-0437.000	FTE	0.4	2.2	2.1	1.7										0.6	
CS Field Staff Manager																		
	CSFC	2200-0942.000	Labor	1,361	1,665	1,832	1,785											
	CSFC	2200-0942.000	NLbr	155	100	111	104											
	CSFC	2200-0942.000	NSE	0	0	0	0											
	CSFC	2200-0942.000	Total	1,516	1,765	1,943	1,889											
	CSFC	2200-0942.000	FTE	16.5	19.7	22.1	21.5											
SDGE Eastern Proj Mgr CSFC (District Op Mgr)																		
	CSFC	2200-2145.000	Labor	61	88	103	-7											
	CSFC	2200-2145.000	NLbr	6	1	9	0											
	CSFC	2200-2145.000	NSE	0	0	0	0											
	CSFC	2200-2145.000	Total	67	89	112	-7											
	CSFC	2200-2145.000	FTE	0.7	0.9	1.1	-0.1											
Quality Assurance																		
	CSFC	2200-2206.000	Labor	0	239	748	768				697	697	697					
	CSFC	2200-2206.000	NLbr	0	50	72	57				63	63	63					
	CSFC	2200-2206.000	NSE	0	0	0	0				0	0	0					
	CSFC	2200-2206.000	Total	0	289	820	825				760	760	760					
	CSFC	2200-2206.000	FTE	0	3	9.9	10.2				9.2	9.2	9.2					

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SCG Customer Service Field
 J. USS Cost Centers - Incremental Forecast

Item #1 - 2200-0345 CS Training Manager	Functional_Area	WorkPaper	CostElement	Adjusted Historical In 2009 \$000's					5 Year Average Forecast				
				2005	2006	2007	2008	2009	2010	2011	2012		
				1,137	1,222	1,381	1,299	1,346	1,276	1,276	1,276		
CSFC	2200-0345.000	Labor		291	160	99	107	94	149	149	149		
CSFC	2200-0345.000	NLbr		0	0	0	0	0	0	0	0		
CSFC	2200-0345.000	NSE		1,428	1,382	1,480	1,406	1,440	1,425	1,425	1,425		
CSFC	2200-0345.000	Total		14.8	15.6	18.1	17	17	16.5	16.5	16.5		
		Labor Rate		\$ 36.93	\$ 37.66	\$ 36.54	\$ 36.46	\$ 37.92					
		Wage Rate						\$ 37.92					
		Annual Salary						\$ 79,176					
		Non-labor / FTE		\$ 20	\$ 10	\$ 5	\$ 6	\$ 6					
		Non-labor 5 Year Avg / FTE						\$ 9					

Incremental Forecast -
 1. FTE's - increment to bring staffing up to 2010 levels ----- 19 FTE's
 2. Labor \$'s @ \$79,176 average annual salary ----- \$ 1,503,312
 3. Total Incremental \$'s ----- \$ 1,503,312

Item #2 - 2200-0942 CS Field Staff Manager	Functional_Area	WorkPaper	CostElement	Adjusted Historical In 2009 \$000's					5 Year Average Forecast				
				2005	2006	2007	2008	2009	2010	2011	2012		
				1,361	1,665	1,832	1,785	1,758	1,680	1,680	1,680		
CSFC	2200-0942.000	Labor		155	100	111	104	137	120	120	120		
CSFC	2200-0942.000	NLbr		0	0	0	0	0	0	0	0		
CSFC	2200-0942.000	NSE		1,516	1,765	1,943	1,889	1,895	1,800	1,800	1,800		
CSFC	2200-0942.000	Total		16.5	19.7	22.1	21.5	21.1	20.2	20.2	20.2		
		Labor Rate		\$ 39.66	\$ 40.63	\$ 39.70	\$ 39.61	\$ 39.90					
		Wage Rate						\$ 39.90					
		Annual Salary						\$ 83,318					
		Non-labor / FTE		\$ 4	\$ 1	\$ 3	\$ 3	\$ 2					
		Non-labor 5 Year Avg / FTE						\$ 2					

Incremental Forecast -
 1. FTE's - increment to bring staffing up to 2010 levels ----- 22 FTE's
 2. Labor \$'s @ \$83,318 average annual salary ----- \$ 1,833,000
 3. Total Incremental \$'s ----- \$ 1,833,000

Exhibit SCG-07-WP
Customer Service Field

2FO000.000_Supp2.pdf

Report of the Application of SCG on Advanced Metering Infrastructure
Chapter 4 - Excerpt
DRA Witness Irwin

Docket:	: <u>A.08-09-023</u>
Exhibit Number	: <u>DRA</u>
Commissioner	: <u>Grueneich</u>
ALJ	: <u>Hecht</u>
Witnesses	: <u>Levin</u>



**DIVISION OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**REPORT ON THE APPLICATION OF
SOUTHERN CALIFORNIA GAS COMPANY ON
ADVANCED METERING INFRASTRUCTURE**

[PUBLIC VERSION]

A.08-09-023

San Francisco, California
April 23, 2009

381412

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ATTACHMENT A

APPENDIX A – QUALIFICATIONS OF WITNESSES

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1 stating that it has already accounted for it in the GRC.²³ Relying on the GRC again,
2 SoCalGas also makes an adjustment to the current travel time due to expected traffic
3 increases.²⁴ SoCalGas's estimated increase per year is a flat tenth of a minute (6 seconds)
4 per trip (10.24 minutes). For 2008 this represents a hair under 1%, but since the annual
5 increase is always a flat 6 seconds, rather than a percentage, it does not increase over time
6 with the travel time increase. Therefore, the percentage of the total that this 6 seconds
7 represents, keeps on decreasing. By the time 2034 arrives, a six second change makes a
8 0.79% increase.²⁵

9 Since traffic can change dramatically and tends to increase over time, a projection of
10 annual drive time increase of less than 1 percent has the potential to seriously underestimate
11 actual drive times. DRA therefore suggests increasing the congestion forecast from an
12 annual increase in drive time of 6 seconds (which is slightly less than 1%) to an annual
13 increase of 2.5%. For a 10.24 minute trip, this would mean that after four years it would be
14 approximately 10% higher, or 11.26 minutes.

15 A fourth oversight regarding SoCalGas's module replacement costs is that it failed to
16 include training material costs for the new task (module replacement). This would include
17 educational materials, demonstration materials (test meters and modules) and presentation
18 materials.²⁶ While these costs are not trivial, for the time being DRA sets them aside. DRA
19 proposes that post deployment costs be increased \$12.3 NPV dollars based on its other three
20 findings in this cost area: a) deficient meter failure rates, b) inconsistent labor rates, and c)
21 unrealistic traffic congestion projections.²⁷ The DRA proposal in nominal dollars is a \$45.9

²³ Summary of Errata, p.1, presented at meeting with SoCalGas March 19, 2009.

²⁴ SoCalGas Workpapers, March 6, 2009, Chapter III, Fin Temp_CSF 6(1).1, Worksheet Forecast Minutes, cells AB3:BD5.

²⁵ SoCalGas Workpapers, March 6, 2009, Chapter III, Fin Temp_CSF 6(1).1, Worksheet Incremental Read and Verify, cells AB14:AC14. $0.079\% = 6 \text{ seconds} / 12.68 \text{ minutes}$

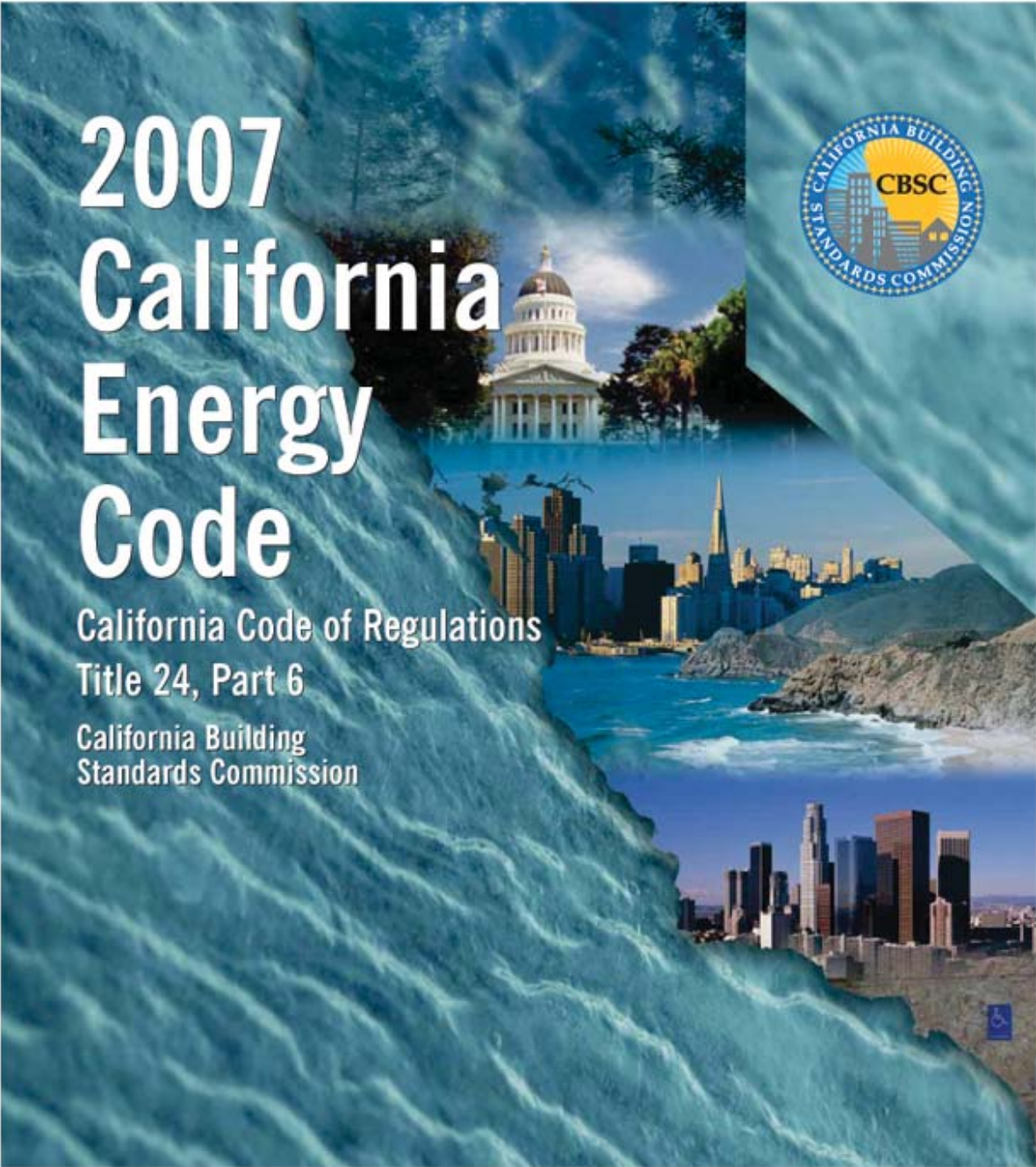
²⁶ SoCalGas DR 14, Q. 4 d. e.

²⁷ DRA Workpapers, Module Replacement Costs.xls. Worksheet Batt. Repl. DRA, cells W7:X13
The DRA model uses the module retrofit contact labor rate as a proxy for the loaded in-house labor rate. The 13% differential between the union contract pay grade 5 wage (\$26.16) and the CSF average wage (\$29.60) was applied (scaled up by) the retrofit contract labor rate to estimate the wage differential impact.

Exhibit SCG-07-WP
Customer Service Field

2FO000.000_Supp3.pdf

California Code of Regulations
Title 24, Part 6, Section 115
Excerpt



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California Code of Regulations, Title 24, Part 6

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SUBCHAPTER 2

**ALL OCCUPANCIES—MANDATORY REQUIREMENTS FOR THE
MANUFACTURE, CONSTRUCTION AND INSTALLATION OF
SYSTEMS, EQUIPMENT AND BUILDING COMPONENTS**

**SECTION 110
SYSTEMS AND EQUIPMENT—GENERAL**

Sections 111 through 119 establish requirements for the manufacture, construction and installation of certain systems, equipment and building components that are installed in buildings regulated by Title 24, Part 6. Systems, equipment and building components listed below may be installed only if:

(a) The manufacturer has certified that the system, equipment or building component complies with the applicable manufacture provisions of Sections 111 through 119; and

(b) The system, equipment or building component complies with the applicable installation provisions of Sections 111 through 119.

No system, equipment or building component covered by the provisions of Sections 111 through 119 that is not certified or that fails to comply with the applicable installation requirements may be installed in a building regulated by Title 24, Part 6.

The systems, equipment and building components covered are:

Appliances regulated by the Appliance Efficiency Regulations (Section 111).

Other space-conditioning equipment (Section 112).

Other service water-heating systems and equipment (Section 113).

Pool and spa heating systems and equipment (Section 114).

Gas appliances (Section 115).

Doors, windows and fenestration products (Section 116).

Joints and other openings (Section 117).

Insulation and cool roofs (Section 118).

Lighting control devices (Section 119).

**SECTION 111
MANDATORY REQUIREMENTS FOR
APPLIANCES REGULATED BY THE APPLIANCE
EFFICIENCY REGULATIONS**

Any appliance for which there is a California standard established in the Appliance Efficiency Regulations may be installed only if the manufacturer has certified to the commission, as specified in those regulations, that the appliance complies with the applicable standard for that appliance. See Appendix 1-A for availability of directories of certified appliances.

**SECTION 112
MANDATORY REQUIREMENTS FOR
SPACE-CONDITIONING EQUIPMENT**

Certification by manufacturers. Any space-conditioning equipment listed in this section may be installed only if the manufacturer has certified that the equipment complies with all the applicable requirements of this section.

(a) **Efficiency.** Equipment shall meet the applicable requirements of Tables 112-A through 112-M, subject to the following:

1. If more than one standard is listed in Tables 112-A through 112-M, the equipment shall meet all the standards listed; and
2. If more than one test method is listed in Tables 112-A through 112-M, the equipment shall comply with the applicable standard when tested with each test method; and
3. Where equipment can serve more than one function, such as both heating and cooling, or both space heating and water heating, it shall comply with all the requirements applicable to each function; and
4. Where a requirement is for equipment rated at its "maximum rated capacity" or "minimum rated capacity," the capacity shall be as provided for and allowed by the controls, during steady-state operation.

Exception to Section 112 (a): Water-cooled centrifugal water-chilling packages that are not designed for operation at ARI Standard 550 test conditions of 44°F leaving chilled water temperature and 85°F entering condenser water temperature shall have a minimum full load COP rating as shown in Tables 112-H, 112-I, and 112-J and a minimum NPLV rating as shown in Tables 112-K, 112-L and 112-M. The table values are only applicable over the following full load design ranges:

Leaving Chiller Water Temperature	40 to 48°F
Entering Condenser Water Temperature	75 to 85°F
Condensing Water Temperature Rise	5 to 15°F

(b) **Controls for heat pumps with supplementary electric resistance heaters.** Heat pumps with supplementary electric resistance heaters shall have controls:

1. That prevent supplementary heater operation when the heating load can be met by the heat pump alone; and
2. In which the cut-on temperature for compression heating is higher than the cut-on temperature for supplementary heating, and the cut-off temperature for compression heating is higher than the cut-off temperature for supplementary heating.

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ALL OCCUPANCIES—MANDATORY REQUIREMENTS

and water heating, it shall comply with all the requirements applicable to each function; and

4. Where a requirement is for equipment rated at its "maximum rated capacity" or "minimum rated capacity," the capacity shall be as provided for and allowed by the controls, during steady-state operation.

(c) **Installation.** Any service water-heating system or equipment may be installed only if the system or equipment complies with all of the applicable requirements of this subsection for the system or equipment.

1. **Outlet temperature controls.** On systems that have a total capacity greater than 167,000 Btu/hr, outlets that require higher than service water temperatures as listed in the ASHRAE Handbook, Applications Volume, shall have separate remote heaters, heat exchangers or boosters to supply the outlet with the higher temperature.
2. **Pumps for circulating systems.** Circulating service water-heating systems shall have a control capable of automatically turning off the circulating pump when hot water is not required.

Exception to Section 113(c) 2: Water heating systems serving a single dwelling unit.

3. **Temperature controls for public lavatories.** The controls shall limit the outlet temperature to 110°F.
4. **Insulation.** Unfired service water heater storage tanks and backup tanks for solar water-heating systems shall have:
 - A. External insulation with an installed *R*-value of at least R-12; or
 - B. Internal and external insulation with a combined *R*-value of at least R-16; or
 - C. The heat loss of the tank surface based on an 80°F water-air temperature difference shall be less than 6.5 Btu per hour per square foot.

5. **Service water heaters in state buildings.** Any newly constructed building constructed by the State shall derive its service water heating from a system that provides at least 60 percent of the energy needed for service water heating from site solar energy or recovered energy.

Exception to Section 113(c) 5: Buildings for which the state architect determines that service water heating from site solar energy or recovered energy is economically or physically infeasible.

**SECTION 114
MANDATORY REQUIREMENTS FOR POOL AND
SPA HEATING SYSTEMS AND EQUIPMENT**

(a) **Certification by manufacturers.** Any pool or spa heating system or equipment may be installed only if the manufacturer has certified that the system or equipment has all of the following:

1. **Efficiency.** A thermal efficiency that complies with the Appliance Efficiency Regulations; and

2. **On-off switch.** A readily accessible on-off switch, mounted on the outside of the heater that allows shutting off the heater without adjusting the thermostat setting; and
3. **Instructions.** A permanent, easily readable and weatherproof plate or card that gives instruction for the energy efficient operation of the pool or spa and for the proper care of pool or spa water when a cover is used; and
4. **Electric resistance heating.** No electric resistance heating; and

Exception 1 to Section 114 (a) 4: Listed package units with fully insulated enclosures, and with tight-fitting covers that are insulated to at least R-6.

Exception 2 to Section 114 (a) 4: Pools or spas deriving at least 60 percent of the annual heating energy from site solar energy or recovered energy.

5. **Pilot light.** No pilot light.

(b) **Installation.** Any pool or spa heating system or equipment shall be installed with all of the following:

1. **Piping.** At least 36 inches of pipe between the filter and the heater to allow for the future addition of solar heating equipment; and
2. **Covers.** A cover for outdoor pools or outdoor spas; and

Exception to Section 114 (b) 2: Pools or spas deriving at least 60 percent of the annual heating energy from site solar energy or recovered energy.

3. **Directional inlets and time switches for pools.** If the system or equipment is for a pool:
The pool shall have directional inlets that adequately mix the pool water; and

The circulation pump shall have a time switch that allows the pump to be set to run in the off-peak electric demand period, and for the minimum time necessary to maintain the water in the condition required by applicable public health standards.

Exception to Section 114 (b) 3: Where applicable public health standards require on-peak operation.

**SECTION 115
NATURAL GAS CENTRAL FURNACES, COOKING
EQUIPMENT, AND POOL AND SPA HEATERS:
PILOT LIGHTS PROHIBITED**

Any natural gas system or equipment listed below may be installed only if it does not have a continuously burning pilot light:

- (a) Fan-type central furnaces.
- (b) Household cooking appliances.

Exception to Section 115 (b): Household cooking appliances without an electrical supply voltage connection and in which each pilot consumes less than 150 Btu/hr.

- (c) Pool heaters.
- (d) Spa heaters.

Exhibit SCG-07-WP
Customer Service Field

2FO000.000_Supp4.pdf

Senate Bill No. 183
Lowenthal, Residential Building Safety
Chapter 8. Carbon Monoxide Poisoning Prevention Act of 2010
SEC. 4 Section 17926
Excerpt

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BILL NUMBER: SB 183 ENROLLED
BILL TEXT

PASSED THE SENATE APRIL 26, 2010
PASSED THE ASSEMBLY APRIL 12, 2010
AMENDED IN ASSEMBLY MARCH 25, 2010
AMENDED IN ASSEMBLY SEPTEMBER 4, 2009
AMENDED IN ASSEMBLY JUNE 22, 2009
AMENDED IN ASSEMBLY JUNE 11, 2009
AMENDED IN SENATE MAY 26, 2009
AMENDED IN SENATE MAY 6, 2009
AMENDED IN SENATE APRIL 13, 2009

INTRODUCED BY Senator Lowenthal
(Coauthor: Senator Wiggins)
(Coauthors: Assembly Members Ma and Saldana)

FEBRUARY 17, 2009

An act to amend Sections 1102.6 and 1102.6d of the Civil Code, and to add Sections 17926, 17926.1, and 17926.2 to, and to add Chapter 8 (commencing with Section 13260) to Part 2 of Division 12 of, the Health and Safety Code, relating to residential building safety.

LEGISLATIVE COUNSEL'S DIGEST

SB 183, Lowenthal. Residential building safety.

(1) Existing law requires certain transferors of real property improved with 1 to 4 dwelling units, as well as transferors of mobilehomes and manufactured homes, to make specified disclosures to prospective transferees regarding the characteristics of the property and prescribes forms for the purpose of making these disclosures. Existing law requires the transferor of real property containing a single-family dwelling to provide transferees written notice of compliance with specified requirements for the installation of smoke detectors. Existing law requires the seller of any real property containing a water heater to certify in writing to a prospective purchaser compliance with specified safety requirements related to those water heaters.

This bill would revise the disclosure forms, described above, to provide a seller certification that the property, at the close of escrow, will be in compliance with the requirements for smoke detectors and water heaters, described above, and to remove these provisions from elsewhere in the forms. The bill would also revise the disclosure forms to add a disclosure regarding carbon monoxide devices and a statement specifying that installation of a listed appliance, device, or amenity is not a precondition to sale or transfer.

Existing law requires the State Fire Marshal to adopt regulations and standards regarding the quality and installation of burglar bars and safety release mechanisms for emergency escape and rescue windows, the approval and installation of smoke detectors, and the approval of portable fire extinguishers for marketing, distribution, and sale in this state. Existing law requires a smoke detector approved and listed by the State Fire Marshal to be installed in a dwelling unit intended for human occupancy. The State Housing Law creates standards for buildings used for human habitation. A violation of that law is a misdemeanor.

This bill would enact the Carbon Monoxide Poisoning Prevention Act of 2010. This bill would require the State Fire Marshal to certify and approve carbon monoxide devices and their instructions, as specified, for the use in dwelling units intended for human

http://info.sen.ca.gov/pub/09-10/bill/sen/sb_0151-0200/sb_183_bill_20100427_enrolled.html

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occupancy, as defined. The bill would require the State Fire Marshal to charge an appropriate fee to the manufacturer of a carbon monoxide device to cover the costs associated with the approval and listing of carbon monoxide devices. The bill would prohibit the marketing, distribution, or sale of devices unless they and their instructions have been approved and listed by the State Fire Marshal. The bill would require a carbon monoxide device to be installed in a dwelling unit intended for human occupancy, as specified, and would generally provide that a violation of these provisions is an infraction punishable by a maximum fine of \$200 for each offense, but the bill would require that a property owner receive a 30-day notice to correct prior to the imposition of the fine. By creating a new crime, this bill would create a state-mandated local program. The bill would provide that a transfer of title is not invalidated on the basis of a failure to comply with these requirements, and that the exclusive remedy for the failure to comply is an award of actual damages not to exceed \$100, exclusive of any court costs and attorney's fees.

This bill would require an owner or the owner's agent of a dwelling unit intended for human occupancy who rents or leases the dwelling unit to a tenant to maintain carbon monoxide devices in that dwelling unit. The bill would permit the owner or the owner's agent to enter that dwelling unit to install, repair, test, and maintain carbon monoxide devices, as specified. The bill would permit the Department of Housing and Community Development to suspend enforcement of certain requirements on property owners if the department, in consultation with the State Fire Marshal, determines that a sufficient amount of tested and approved carbon monoxide devices are not available, and would require the department to publicize this decision, as specified. The bill would also make a statement of legislative findings.

(2) The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1. Section 1102.6 of the Civil Code is amended to read:
1102.6. The disclosures required by this article pertaining to the property proposed to be transferred are set forth in, and shall be made on a copy of, the following disclosure form:

SEC. 2. Section 1102.6d of the Civil Code is amended to read:
1102.6d. Except for manufactured homes and mobilehomes located in a common interest development governed by Title 6 (commencing with Section 1351), the disclosures applicable to the resale of a manufactured home or mobilehome pursuant to subdivision (b) of Section 1102 are set forth in, and shall be made on a copy of, the following disclosure form:

SEC. 3. Chapter 8 (commencing with Section 13260) is added to Part 2 of Division 12 of the Health and Safety Code, to read:

CHAPTER 8. CARBON MONOXIDE POISONING PREVENTION ACT OF 2010

13260. This chapter shall be known and may be cited as the Carbon Monoxide Poisoning Prevention Act of 2010.

13261. The Legislature finds and declares all of the following:

(a) According to the American Medical Association, carbon monoxide is the leading cause of accidental poisoning deaths in the United States. The federal Centers for Disease Control and Prevention estimate that carbon monoxide kills approximately 500 people each

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year and injures another 20,000 people nationwide.

(b) According to the United States Environmental Protection Agency, a person cannot see or smell carbon monoxide. At high levels carbon monoxide can kill a person in minutes. Carbon monoxide is produced whenever any fuel, such as gas, oil, kerosene, wood, or charcoal, is burned.

(c) The State Air Resources Board estimates that every year carbon monoxide accounts for between 30 and 40 avoidable deaths, possibly thousands of avoidable illnesses, and between 175 and 700 avoidable emergency room and hospital visits.

(d) There are well-documented chronic health effects of acute carbon monoxide poisoning or prolonged exposure to carbon monoxide, including, but not limited to, lethargy, headaches, concentration problems, amnesia, psychosis, Parkinson's disease, memory impairment, and personality alterations.

(e) Experts estimate that equipping every home with a carbon monoxide device would cut accident-related costs by 93 percent. Eighteen states and a number of large cities have laws mandating the use of carbon monoxide devices.

(f) Carbon monoxide devices provide a vital, highly effective, and low-cost protection against carbon monoxide poisoning and these devices should be made available to every home in California.

(g) The Homeowners' Guide to Environmental Hazards prepared pursuant to Section 10084 of the Business and Professions Code is an important educational tool and should include information regarding carbon monoxide. It is the intent of the Legislature that when the booklet is next updated as existing resources permit, or as private resources are made available, it be updated to include a section on carbon monoxide.

13262. For purposes of this chapter, the following definitions shall apply:

(a) "Carbon monoxide device" means a device that meets all of the following requirements:

(1) A device designed to detect carbon monoxide and produce a distinct, audible alarm.

(2) A device that is battery powered, a plug-in device with battery backup, or a device installed as recommended by Standard 720 of the National Fire Protection Association that is either wired into the alternating current power line of the dwelling unit with a secondary battery backup or connected to a system via a panel.

(3) If the device is combined with a smoke detector, the combined device shall comply with all of the following:

(A) The standards that apply to carbon monoxide alarms as described in this chapter.

(B) The standards that apply to smoke detectors, as described in Section 13113.7.

(C) The combined device emits an alarm or voice warning in a manner that clearly differentiates between a carbon monoxide alarm warning and a smoke detector warning.

(4) The device has been tested and certified, pursuant to the requirements of the American National Standards Institute (ANSI) and Underwriters Laboratories Inc. (UL) as set forth in either ANSI/UL 2034 or ANSI/UL 2075, or successor standards, by a nationally recognized testing laboratory listed in the directory of approved testing laboratories established by the Building Materials Listing Program of the Fire Engineering Division of the Office of the State Fire Marshal of the Department of Forestry and Fire Protection.

(b) "Dwelling unit intended for human occupancy" means a single-family dwelling, factory-built home as defined in Section 19971, duplex, lodging house, dormitory, hotel, motel, condominium, stock cooperative, time-share project, or dwelling unit in a multiple-unit dwelling unit building or buildings. "Dwelling unit intended for human occupancy" does not mean a property owned or leased by the state, the Regents of the University of California, or

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a local governmental agency.

(c) "Fossil fuel" means coal, kerosene, oil, wood, fuel gases, and other petroleum or hydrocarbon products, which emit carbon monoxide as a byproduct of combustion.

13263. (a) (1) The State Fire Marshal shall develop a certification and decertification process to approve and list carbon monoxide devices and to disapprove and delist previously approved devices, if necessary. The certification and decertification process shall include consideration of effectiveness and reliability of the devices, including, but not limited to, their propensity to record false alarms. The certification and decertification process shall include a review of the manufacturer's instructions and shall ensure their consistency with building standards applicable to new construction for the relevant type of occupancy with respect to number and placement.

(2) The State Fire Marshal shall charge an appropriate fee to the manufacturer of a carbon monoxide device to cover his or her costs associated with the approval and listing of carbon monoxide devices.

(b) A person shall not market, distribute, offer for sale, or sell any carbon monoxide device in this state unless the device and the instructions have been approved and listed by the State Fire Marshal.

SEC. 4. Section 17926 is added to the Health and Safety Code, to read:

17926. (a) An owner of a dwelling unit intended for human occupancy shall install a carbon monoxide device, approved and listed by the State Fire Marshal pursuant to Section 13263, in each existing dwelling unit having a fossil fuel burning heater or appliance, fireplace, or an attached garage, within the earliest applicable time period as follows:

(1) For all existing single-family dwelling units intended for human occupancy on or before July 1, 2011.

(2) For all other existing dwelling units intended for human occupancy on or before January 1, 2013.

(b) With respect to the number and placement of carbon monoxide devices, an owner shall install the devices in a manner consistent with building standards applicable to new construction for the relevant type of occupancy or with the manufacturer's instructions, if it is technically feasible to do so.

(c) (1) Notwithstanding Section 17995, and except as provided in paragraph (2), a violation of this section is an infraction punishable by a maximum fine of two hundred dollars (\$200) for each offense.

(2) Notwithstanding paragraph (1), a property owner shall receive a 30-day notice to correct. If an owner receiving notice fails to correct within that time period, the owner may be assessed the fine pursuant to paragraph (2).

(d) No transfer of title shall be invalidated on the basis of a failure to comply with this section, and the exclusive remedy for the failure to comply with this section is an award of actual damages not to exceed one hundred dollars (\$100), exclusive of any court costs and attorney's fees. This subdivision is not intended to affect any duties, rights, or remedies otherwise available at law.

(e) A local ordinance requiring carbon monoxide devices may be enacted or amended if the ordinance is consistent with this chapter.

SEC. 5. Section 17926.1 is added to the Health and Safety Code, to read:

17926.1. (a) An owner or owner's agent of a dwelling unit intended for human occupancy who rents or leases the dwelling unit to a tenant shall maintain carbon monoxide devices in that dwelling unit consistent with this section and Section 17926.

(b) An owner or the owner's agent may enter any dwelling unit intended for human occupancy owned by the owner for the purpose of installing, repairing, testing, and maintaining carbon monoxide

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devices required by this section, pursuant to the authority and requirements of Section 1954 of the Civil Code.

(c) The carbon monoxide device shall be operable at the time that the tenant takes possession. A tenant shall be responsible for notifying the owner or owner's agent if the tenant becomes aware of an inoperable or deficient carbon monoxide device within his or her unit. The owner or owner's agent shall correct any reported deficiencies or inoperabilities in the carbon monoxide device and shall not be in violation of this section for a deficient or inoperable carbon monoxide device when he or she has not received notice of the deficiency or inoperability.

(d) This section shall not affect any rights which the parties may have under any other provision of law because of the presence or absence of a carbon monoxide device.

(e) For purposes of this section, with respect to a time-share project, "owner" means the homeowners' association of the time-share project.

SEC. 6. Section 17926.2 is added to the Health and Safety Code, to read:

17926.2. (a) If the department, in consultation with the State Fire Marshal, determines that a sufficient amount of tested and approved carbon monoxide devices are not available to property owners to meet the requirements of the Carbon Monoxide Poisoning Prevention Act of 2009 and Sections 17926 and 17926.1, the department may suspend enforcement of the requirements of Sections 17926 and 17926.1 for up to six months. If the department elects to suspend enforcement of these requirements, the department shall notify the Secretary of State of its decision and shall post a public notice that describes its findings and decision on the departmental Internet Web site.

(b) If the California Building Standards Commission adopts or updates building standards relating to carbon monoxide devices, the owner or owner's agent, who has installed a carbon monoxide device as required by Section 17926 or 17926.1, shall not be required to install a new device meeting the requirements of those building standards within an individual dwelling unit until the owner makes application for a permit for alterations, repairs, or additions to that dwelling unit, the cost of which will exceed one thousand dollars (\$1,000).

SEC. 7. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

Beginning of Workpaper
2FO001.000 - Customer Service Dispatch Operations

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Field Ops-CSF Opers-Dispatch
Workpaper: 2FO001.000 - Customer Service Dispatch Operations

Activity Description:

Labor and non-labor costs associated with providing dispatch services for customer service field personnel. Dispatch services include both the routing and dispatching of work to field personnel on a day before and same day basis.

Forecast Methodology:

Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in the dispatch office. This workgroup remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

Non-Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in the dispatch office. This workgroup remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Years									
Labor	8,212	8,382	8,402	8,089	8,130	8,243	8,243	7,989	
Non-Labor	429	404	328	292	198	330	330	330	
NSE	0	0	0	0	0	0	0	0	
Total	8,641	8,786	8,730	8,381	8,328	8,573	8,573	8,319	
FTE	115.0	115.6	114.7	111.4	109.0	113.1	113.1	109.6	

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Field Ops-CSF Opers-Dispatch
 Workpaper: 2FO001.000 - Customer Service Dispatch Operations

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	8,243	8,243	8,243	0	0	-254	8,243	8,243	7,989
Non-Labor	5-YR Average	330	330	330	0	0	0	330	330	330
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		8,573	8,573	8,573	0	0	-254	8,573	8,573	8,319
FTE	5-YR Average	113.1	113.1	113.1	0.0	0.0	-3.5	113.1	113.1	109.6

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012	-254	0	0	-254	0.0	1-Sided Adj
Reduction in dispatch straight-time and over-time hours due to efficiencies gained as a result of the Forecasting & Scheduling Project; -6,240 ST hours x \$32.49 avg hourly rate = -\$202,722; -1,040 OT hours x \$49.21 avg hourly rate = \$51,175. See Supplemental Workpaper 2FO000.000_Supp1.pfd, "SCG Customer Service Field E. Benefit-Forecasting & Scheduling Project".						
2012	0	0	0	0	-3.5	1-Sided Adj
Reduction in dispatch straight-time and over-time hours due to efficiencies gained as a result of the Forecasting & Scheduling Project; (-6,240 ST hours + -1,040 OT hours) / 2088 FTE hours = 3.5 FTEs. See Supplemental Workpaper 2FO000.000_Supp1.pfd, "SCG Customer Service Field E. Benefit-Forecasting & Scheduling Project".						
2012 Total	-254	0	0	-254	-3.5	

Southern California Gas Company
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Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Field Ops-CSF Opers-Dispatch
Workpaper: 2FO001.000 - Customer Service Dispatch Operations

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	6,671	7,196	7,058	6,959	7,263
Non-Labor	503	409	373	400	327
NSE	0	0	0	0	0
Total	7,175	7,605	7,431	7,359	7,591
FTE	104.1	108.1	101.7	98.1	97.0
Adjustments (Nominal \$) **					
Labor	-404	-661	-308	-344	-378
Non-Labor	-121	-37	-60	-107	-130
NSE	0	0	0	0	0
Total	-525	-698	-368	-452	-507
FTE	-6.7	-10.4	-4.7	-5.1	-5.3
Recorded-Adjusted (Nominal \$)					
Labor	6,267	6,535	6,751	6,615	6,886
Non-Labor	382	373	313	293	198
NSE	0	0	0	0	0
Total	6,650	6,908	7,063	6,908	7,083
FTE	97.4	97.7	97.0	93.0	91.7
Vacation & Sick (Nominal \$)					
Labor	1,069	1,168	1,178	1,275	1,244
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	1,069	1,168	1,178	1,275	1,244
FTE	17.6	17.9	17.7	18.4	17.3
Escalation to 2009\$					
Labor	876	679	474	200	0
Non-Labor	47	31	15	-1	0
NSE	0	0	0	0	0
Total	923	710	489	199	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	8,212	8,382	8,402	8,089	8,130
Non-Labor	429	404	328	292	198
NSE	0	0	0	0	0
Total	8,641	8,785	8,730	8,382	8,328
FTE	115.0	115.6	114.7	111.4	109.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Field Ops-CSF Opers-Dispatch
Workpaper: 2FO001.000 - Customer Service Dispatch Operations

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000)				
	2005	2006	2007	2008	2009
Labor	-404	-661	-308	-344	-378
Non-Labor	-121	-37	-60	-107	-130
NSE	0	0	0	0	0
Total	-525	-698	-368	-452	-507
FTE	-6.7	-10.4	-4.7	-5.1	-5.3

Detail of Adjustments to Recorded:

Year/Expl.	Labor	NLbr	NSE	FTE	Adj Type	From CCtr	RefID
2005	-404	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 15426320
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2005	0	-121	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 15514527
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2005	0	0	0	-6.7	1-Sided Adj	N/A	TPKAJ201004201 15607040
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2005 Total	-404	-121	0	-6.7			

2006	-661	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 23454180
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							

Southern California Gas Company
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 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Field Ops-CSF Opers-Dispatch
 Workpaper: 2FO001.000 - Customer Service Dispatch Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	0	-37	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 23540633
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2006	0	0	0	-10.4	1-Sided Adj	N/A	TPKAJ201004201 23635353
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2006 Total	-661	-37	0	-10.4			
2007	-308	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 25824667
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2007	0	-60	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 25926493
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2007	0	0	0	-4.7	1-Sided Adj	N/A	TPKAJ201004201 30151057
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2007 Total	-308	-60	0	-4.7			
2008	-344	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34109377
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Field Ops-CSF Opers-Dispatch
 Workpaper: 2FO001.000 - Customer Service Dispatch Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008	0	-107	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34152210
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2008	0	0	0	-5.1	1-Sided Adj	N/A	TPKAJ201004201 34255297
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2008 Total	-344	-107	0	-5.1			

2009	-378	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40540650
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2009	0	-130	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40618320
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2009	0	0	0	-5.3	1-Sided Adj	N/A	TPKAJ201004201 40654007
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), and Customer Operations Analyst (COA) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2009 Total	-378	-130	0	-5.3			

Beginning of Workpaper
2FO002.000 - Customer Service Field Supervision

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

Activity Description:

Labor and non-labor costs associated with the direct supervision of the customer service field operations workforce.

Forecast Methodology:

Labor - Zero-Based

The customer service field operations supervisor forecast is based on maintaining the current customer service field operations employee to supervisor ratio. The customer service field operations employee forecast and explanation of the applied forecast methodology can be found in workgroup FO000.000.

Non-Labor - Zero-Based

The customer service field operations supervisor non-labor is forecast based on the five-year average of historical non-labor expense per supervisor Full-time Equivalent (FTE) multiplied by the forecasted supervisor FTEs.

NSE - Zero-Based

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)							
	Adjusted-Recorded					Adjusted-Forecast		
	2005	2006	2007	2008	2009	2010	2011	2012
Years								
Labor	7,721	8,301	8,989	9,229	9,337	9,917	10,171	10,326
Non-Labor	1,071	1,070	1,019	992	1,081	1,217	1,236	1,248
NSE	0	0	0	0	0	0	0	0
Total	8,792	9,371	10,008	10,221	10,418	11,134	11,407	11,574
FTE	97.7	102.2	109.3	111.5	110.9	117.0	120.5	121.8

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	Zero-Based	0	0	0	9,917	10,171	10,326	9,917	10,171	10,326
Non-Labor	Zero-Based	0	0	0	1,217	1,236	1,248	1,217	1,236	1,248
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	11,134	11,407	11,574	11,134	11,407	11,574
FTE	Zero-Based	0.0	0.0	0.0	117.0	120.5	121.8	117.0	120.5	121.8

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	9,917	0	0	9,917	0.0	1-Sided Adj

Labor costs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to 1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2010	0	0	0	0	117.0	1-Sided Adj
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FTEs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to 1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2010	0	1,151	0	1,151	0.0	1-Sided Adj
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Non-labor costs required for customer service field supervisors. Non-labor forecast methodology – 5-year average of non-labor per field supervisor full-time equivalent x forecasted supervisor full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2010	0	66	0	66	0.0	1-Sided Adj
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On-going air card expense for customer service field supervision mobile data terminals (Field Force Supervisor Enablement Initiative-OpEx). See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field – F. Field Force/Supervisor Enablement Initiative (OpEx Project)" for analysis.

Southern California Gas Company
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 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2010 Total	9,917	1,217	0	11,134	117.0	

2011 0 1,185 0 1,185 0.0 1-Sided Adj

Non-labor costs required for customer service field supervisors. Non-labor forecast methodology – 5-year average of non-labor per field supervisor full-time equivalent x forecasted supervisor full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2011 10,171 0 0 10,171 0.0 1-Sided Adj

Labor costs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to 1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis.

2011 0 0 0 0 120.5 1-Sided Adj

FTEs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to 1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis

2011 0 51 0 51 0.0 1-Sided Adj

On-going air card expense for customer service field supervision mobile data terminals (Field Force Supervisor Enablement Initiative-OpEx). See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field – F. Field Force/Supervisor Enablement Initiative (OpEx Project)" for analysis.

2011 Total	10,171	1,236	0	11,407	120.5	
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2012 0 1,199 0 1,199 0.0 1-Sided Adj

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
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Non-labor costs required for customer service field supervisors. Non-labor forecast methodology – 5-year average of non-labor per field supervisor full-time equivalent x forecasted supervisor full-time equivalent. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for analysis.

2012	10,326	0	0	10,326	0.0	1-Sided Adj
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Labor costs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis

2012	0	0	0	0	121.8	1-Sided Adj
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FTEs associated with the direct supervision of customer service field employees performing forecasted order activities. Supervision forecast methodology - base year ratio of field employees to supervisor of 12 to 1, applied to forecasted customer service field employees. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field - C. Non-Shared Cost Center Workgroups - Historical & Forecast Consolidated Data" for detailed analysis

2012	0	49	0	49	0.0	1-Sided Adj
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On-going air card expense for customer service field supervision mobile data terminals (Field Force Supervisor Enablement Initiative-OpEx). See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SoCalGas Customer Service Field – F. Field Force/Supervisor Enablement Initiative (OpEx Project)" for analysis.

2012 Total	10,326	1,248	0	11,574	121.8	
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Southern California Gas Company
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Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Field Ops-CSF Support
Workpaper: 2FO002.000 - Customer Service Field Supervision

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	9,620	10,388	11,242	11,524	11,968
Non-Labor	981	1,024	995	1,015	1,119
NSE	0	0	0	0	0
Total	10,601	11,412	12,237	12,539	13,087
FTE	143.9	148.8	154.1	152.4	151.4
Adjustments (Nominal \$) **					
Labor	-3,728	-3,916	-4,020	-3,977	-4,060
Non-Labor	-27	-36	-23	-21	-39
NSE	0	0	0	0	0
Total	-3,755	-3,952	-4,043	-3,998	-4,099
FTE	-61.1	-62.4	-61.6	-59.3	-58.1
Recorded-Adjusted (Nominal \$)					
Labor	5,892	6,472	7,222	7,546	7,908
Non-Labor	954	988	972	994	1,081
NSE	0	0	0	0	0
Total	6,846	7,460	8,194	8,541	8,988
FTE	82.8	86.4	92.5	93.1	93.3
Vacation & Sick (Nominal \$)					
Labor	1,005	1,157	1,260	1,454	1,429
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	1,005	1,157	1,260	1,454	1,429
FTE	14.9	15.8	16.8	18.4	17.6
Escalation to 2009\$					
Labor	824	672	507	228	0
Non-Labor	117	82	47	-2	0
NSE	0	0	0	0	0
Total	941	755	554	225	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	7,721	8,301	8,989	9,229	9,337
Non-Labor	1,071	1,070	1,019	992	1,081
NSE	0	0	0	0	0
Total	8,792	9,371	10,008	10,220	10,417
FTE	97.7	102.2	109.3	111.5	110.9

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Field Ops-CSF Support
Workpaper: 2FO002.000 - Customer Service Field Supervision

Summary of Adjustments to Recorded:

In Nominal \$ (000)					
Year	2005	2006	2007	2008	2009
Labor	-3,728	-3,916	-4,020	-3,977	-4,060
Non-Labor	-27	-36	-23	-21	-39
NSE	0	0	0	0	0
Total	<u>-3,755</u>	<u>-3,952</u>	<u>-4,043</u>	<u>-3,998</u>	<u>-4,099</u>
FTE	-61.1	-62.4	-61.6	-59.3	-58.1

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From Cctr</u>	<u>RefID</u>
2005	147	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 15819290
Addition of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2005	0	0	0	2.1	1-Sided Adj	N/A	TPKAJ201004201 15920417
Addition of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2005	-3,875	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 20041023
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2005	0	-27	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 20130370
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2005	0	0	0	-63.2	1-Sided Adj	N/A	TPKAJ201004201 20348633
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2005 Total	-3,728	-27	0	-61.1			

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 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	101	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 24013743
Addition of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2006	-4,018	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 24154353
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2006	0	-36	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 24240963
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2006	0	0	0	1.4	1-Sided Adj	N/A	TPKAJ201004201 24507400
Addition of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2006	0	0	0	-63.8	1-Sided Adj	N/A	TPKAJ201004201 24651197
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2006 Total	-3,916	-36	0	-62.4			
2007	57	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 30344807
Addition of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2007	-4,076	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 30444383
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
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 Workpaper: 2FO002.000 - Customer Service Field Supervision

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2007	0	-23	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 30527493
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2007	0	0	0	0.8	1-Sided Adj	N/A	TPKAJ201004201 30637713
Addition of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2007	0	0	0	-62.4	1-Sided Adj	N/A	TPKAJ201004201 30813620
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2007 Total	-4,020	-23	0	-61.6			
2008	24	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34408637
Addition of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2008	-4,002	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34501333
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							
2008	0	-21	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34551543
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.							
2008	0	0	0	-59.7	1-Sided Adj	N/A	TPKAJ201004201 34635453
Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.							

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Field Ops-CSF Support
 Workpaper: 2FO002.000 - Customer Service Field Supervision

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008	0	0	0	0.4	1-Sided Adj	N/A	TPKAJ201004201 34729580
<p>Addition of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.</p>							
2008 Total	-3,977	-21	0	-59.3			
2009	20	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40809850
<p>Addition of historical customer service field supervision labor costs in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.</p>							
2009	0	0	0	0.2	1-Sided Adj	N/A	TPKAJ201004201 40849570
<p>Addition of historical customer service field supervision full-time equivalents in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.</p>							
2009	-4,080	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 40937150
<p>Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs and customer service field union employee costs (retro pay as a result of contract ratification) in order to align the history with the forecast. See offsetting adjustments for union employee retro pay in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.</p>							
2009	0	-39	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 41009350
<p>Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs and customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustments for miscellaneous non-labor tools expense in 2FO000.000 CSF Operations and FI, QA, and COA costs in 2FO003.000 CSF Staff.</p>							
2009	0	0	0	-58.3	1-Sided Adj	N/A	TPKAJ201004201 41123507
<p>Reduction of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO003.000 CSF Staff.</p>							
2009 Total	-4,060	-39	0	-58.1			

Beginning of Workpaper
2FO003.000 - Customer Service Field Management and Staff Support

Southern California Gas Company
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 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. Field Ops-CSF Staff
 Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

Activity Description:

Labor and non-labor costs associated with management, associate, administrative and staff support for the customer service field organization.

Forecast Methodology:

Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in the customer service management and staff support area. The cost centers in this workgroup primarily perform staff type functions or high level management and are reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

Non-Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in the customer service management and staff support area. The cost centers in this workgroup primarily perform staff type functions or high level management and are reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Years									
Labor	6,706	7,249	6,749	6,560	6,412	6,735	6,735	6,735	
Non-Labor	688	425	407	386	399	461	461	461	
NSE	0	0	0	0	0	0	0	0	
Total	7,394	7,674	7,156	6,946	6,811	7,196	7,196	7,196	
FTE	94.4	101.6	91.6	90.2	87.4	93.0	93.0	93.0	

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. Field Ops-CSF Staff
 Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	6,735	6,735	6,735	0	0	0	6,735	6,735	6,735
Non-Labor	5-YR Average	461	461	461	0	0	0	461	461	461
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		7,196	7,196	7,196	0	0	0	7,196	7,196	7,196
FTE	5-YR Average	93.0	93.0	93.0	0.0	0.0	0.0	93.0	93.0	93.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012 Total	0	0	0	0	0.0	

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
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Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	984	1,086	1,124	1,089	1,001
Non-Labor	958	333	385	805	277
NSE	0	0	0	0	0
Total	1,941	1,419	1,509	1,895	1,279
FTE	12.6	13.3	12.0	11.6	5.7
Adjustments (Nominal \$) **					
Labor	4,135	4,565	4,298	4,275	4,429
Non-Labor	-345	59	4	-418	122
NSE	0	0	0	0	0
Total	3,789	4,624	4,301	3,856	4,551
FTE	67.4	72.6	65.5	63.7	67.8
Recorded-Adjusted (Nominal \$)					
Labor	5,118	5,652	5,422	5,364	5,431
Non-Labor	612	392	389	387	399
NSE	0	0	0	0	0
Total	5,731	6,044	5,811	5,751	5,830
FTE	80.0	85.9	77.5	75.3	73.5
Vacation & Sick (Nominal \$)					
Labor	873	1,010	946	1,034	981
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	873	1,010	946	1,034	981
FTE	14.4	15.7	14.1	14.9	13.9
Escalation to 2009\$					
Labor	716	587	381	162	0
Non-Labor	75	33	19	-1	0
NSE	0	0	0	0	0
Total	791	620	399	161	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	6,706	7,249	6,749	6,560	6,412
Non-Labor	688	425	407	386	399
NSE	0	0	0	0	0
Total	7,394	7,673	7,156	6,946	6,811
FTE	94.4	101.6	91.6	90.2	87.4

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
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Non-Shared Service Workpapers

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Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

Summary of Adjustments to Recorded:

In Nominal \$ (000)					
Year	2005	2006	2007	2008	2009
Labor	4,135	4,565	4,298	4,275	4,429
Non-Labor	-345	59	4	-418	122
NSE	0	0	0	0	0
Total	3,789	4,624	4,301	3,856	4,551
FTE	67.4	72.6	65.5	63.7	67.8

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	-58	0	0	0.0	CCTR Transf	To 2200-0350.000	TP6JJP20090914 122806023
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and Mgmnt expenses. S/B 2200-0350							
2005	0	0	0	-0.9	CCTR Transf	To 2200-0350.000	TP6JJP20090914 122939777
Cost in cost center 2200-2029 belongs to Mass Markets Credit & Collections and Mgmnt expenses. S/B 2200-0350.							
2005	-86	0	0	0.0	CCTR Transf	To 2200-0351.000	TP6JJP20090914 123609657
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and Nonmgmnt expenses. S/B 2200-0351							
2005	0	0	0	-1.5	CCTR Transf	To 2200-0351.000	TP6JJP20090914 123655080
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmnt expenses. S/B 2200-0351							
2005	4,279	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 20517510
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.							
2005	0	35	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 20624587
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.							

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 Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	0	0	0	69.8	1-Sided Adj	N/A	TPKAJ201004201 20739133
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.							
2005	0	-380	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 21145820
Reduction of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2005 Total	4,135	-345	0	67.4			
2006	-14	0	0	0.0	CCTR Transf	To 2200-0350.000	TP6JJP20090914 123303340
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and Mgmnt expenses. S/B 2200-0350							
2006	0	0	0	-0.2	CCTR Transf	To 2200-0350.000	TP6JJP20090914 123402670
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and Mgmnt expenses. S/B 2200-0350							
2006	-100	0	0	0.0	CCTR Transf	To 2200-0351.000	TP6JJP20090914 123816503
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmnt expenses. S/B 2200-0351							
2006	0	0	0	-1.7	CCTR Transf	To 2200-0351.000	TP6JJP20090914 123857647
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmnt expenses. S/B 2200-0351							
2006	4,679	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 24815087
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.							
2006	0	59	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 24902417
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.							

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<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	0	0	0	74.5	1-Sided Adj	N/A	TPKAJ201004201 24951557
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2006 Total	4,565	59	0	72.6			
2007	-86	0	0	0.0	CCTR Transf	To 2200-0351.000	TP6JJP20090914 124022630
<p>Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmt expenses. S/B 2200-0351</p>							
2007	0	0	0	-1.4	CCTR Transf	To 2200-0351.000	TP6JJP20090914 124056117
<p>Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmt expenses. S/B 2200-0351</p>							
2007	4,384	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 33100977
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2007	0	68	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 33154417
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2007	0	-65	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 33251337
<p>Reduction of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.</p>							
2007	0	0	0	66.9	1-Sided Adj	N/A	TPKAJ201004201 33337820
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2007 Total	4,298	4	0	65.5			

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 Workpaper: 2FO003.000 - Customer Service Field Management and Staff Support

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008	-71	0	0	0.0	CCTR Transf	To 2200-0351.000	TP6JJP20090914 124150117
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmnt expenses. S/B 2200-0351							
2008	0	0	0	-1.1	CCTR Transf	To 2200-0351.000	TP6JJP20090914 124228727
Cost in cost center 2200-2029 belong to Mass Markets Credit & Collections and NonMgmnt expenses. S/B 2200-0351							
2008	4,346	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34849913
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Oper-Dispatch and in 2FO002.000 CSF Support.							
2008	0	115	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 34938730
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Oper-Dispatch and in 2FO002.000 CSF Support.							
2008	0	0	0	64.8	1-Sided Adj	N/A	TPKAJ201004201 35021123
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Oper-Dispatch and in 2FO002.000 CSF Support.							
2008	0	-533	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 35107780
Reduction of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.							
2008 Total	4,275	-418	0	63.7			

2009	4,429	0	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 41401007
Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Oper-Dispatch and in 2FO002.000 CSF Support.							

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<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2009	0	141	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 41435083
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) non-labor costs in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2009	0	0	0	4.5	1-Sided Adj	N/A	TPKAJ201004201 41540477
<p>Adjustment to correct data entry error on journal entry posted in March of 2009; input error of 9,514 hours (4.6 full-time equivalent) transferring from O&M to capital should have been entered as 95.14 hours (0.05 full-time equivalent).</p>							
2009	0	0	0	63.3	1-Sided Adj	N/A	TPKAJ201004201 41623210
<p>Addition of Field Instructor (FI), Quality Assurance Inspector (QA), District Operations Manager (DOM), and District Operations Clerks (DOC) full-time equivalents in order to align the history with the forecast. See offsetting adjustments in 2FO001.000 CSF Opers-Dispatch and in 2FO002.000 CSF Support.</p>							
2009	0	-19	0	0.0	1-Sided Adj	N/A	TPKAJ201004201 41655430
<p>Reduction of customer service field miscellaneous non-labor tools expense in order to align the history with the forecast. See offsetting adjustment in 2FO000.000 CSF Operations.</p>							
2009 Total	4,429	122	0	67.8			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Workpaper: VARIOUS

Summary for Category: B. Customer Contact Center

	In 2009\$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	37,889	41,777	41,845	42,303
Non-Labor	2,689	3,747	3,984	4,002
NSE	0	0	0	0
Total	40,578	45,524	45,829	46,305
FTE	587.3	640.4	643.7	648.9

Workpapers belonging to this Category:

2CC000.000 CCC - Operations

Labor	31,615	35,322	35,390	35,848
Non-Labor	306	355	357	360
NSE	0	0	0	0
Total	31,921	35,677	35,747	36,208
FTE	495.1	546.6	549.9	555.1

2CC001.000 CCC - Support

Labor	6,274	6,455	6,455	6,455
Non-Labor	2,383	3,392	3,627	3,642
NSE	0	0	0	0
Total	8,657	9,847	10,082	10,097
FTE	92.2	93.8	93.8	93.8

Beginning of Workpaper
2CC000.000 - CCC - Operations

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. Customer Contact Center - Operations
 Workpaper: 2CC000.000 - CCC - Operations

Activity Description:

Labor and non-labor costs associated with the Customer Contact Center (CCC). CCC expenses cover the costs of answering customer telephone calls; responding to incoming email from customers; answering written customer correspondence regarding customer account activity; following up on all California Public Utilities Commission (CPUC) telephone referrals and informal and formal CPUC complaints; and, responding to other customer account related inquiries.

Forecast Methodology:

Labor - Zero-Based

Due to the various and sometimes volatile nature of the primary business drivers impacting Customer Service Representative (CSR) Full-Time Equivalent (FTE) requirements, including CSR answered calls, level of service, average call handle time, and agent occupancy, a zero based forecast, based on increased call volume and increased average handle time (AHT) and using call center workforce management software, was applied.

Non-Labor - Zero-Based

For the CCC Operations non-labor category, a zero based forecast was used by applying the five-year average non-labor cost per FTE and multiplying that times the number of forecasted FTEs. These non-labor expenses primarily consist of travel expense, office supplies, office furniture, and headsets.

NSE - Zero-Based

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Years									
Labor	31,306	32,295	31,296	32,081	31,615	35,322	35,390	35,848	
Non-Labor	316	347	361	322	306	355	357	360	
NSE	0	0	0	0	0	0	0	0	
Total	31,622	32,642	31,657	32,403	31,921	35,677	35,747	36,208	
FTE	510.2	517.9	502.4	519.3	495.1	546.6	549.9	555.1	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. Customer Contact Center - Operations
 Workpaper: 2CC000.000 - CCC - Operations

Forecast Summary:

		In 2009 \$(000)								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	Zero-Based	0	0	0	35,322	35,390	35,848	35,322	35,390	35,848
Non-Labor	Zero-Based	0	0	0	355	357	360	355	357	360
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	35,677	35,747	36,208	35,677	35,747	36,208
FTE	Zero-Based	0.0	0.0	0.0	546.6	549.9	555.1	546.6	549.9	555.1

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	35,322	0	0	35,322	0.0	1-Sided Adj

Labor forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. Forecasted CSR call volume - 1.42 five-year average calls per active meter x 5,520,424 forecasted active meters = 7,851,895 CSR handled calls. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

2010	0	355	0	355	0.0	1-Sided Adj
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Five-year average of historical non-labor expense per Full-Time Equivalent (FTE) multiplied by forecasted CCC Operations FTE - \$649 non-labor per FTE x 546.6 forecasted FTEs = \$355,000. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Operations Non-labor Forecast".

2010	0	0	0	0	546.6	1-Sided Adj
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Full-time Equivalent forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

2010 Total	35,322	355	0	35,677	546.6	
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2011	35,390	0	0	35,390	0.0	1-Sided Adj
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Labor forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. Forecasted CSR call volume - 1.42 five-year average calls per active meter x 5,565,817 forecasted active meters = 7,916,459 CSR handled calls. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. Customer Contact Center - Operations
 Workpaper: 2CC000.000 - CCC - Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011	0	357	0	357	0.0	1-Sided Adj

Five-year average of historical non-labor expense per Full-Time Equivalent (FTE) multiplied by forecasted CCC Operations FTE - \$649 non-labor per FTE x 549.9 forecasted FTEs = \$357,000. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Operations Non-labor Forecast".

2011	0	0	0	0	549.9	1-Sided Adj
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Full-time Equivalent forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

2011 Total	35,390	357	0	35,747	549.9	
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2012	35,848	0	0	35,848	0.0	1-Sided Adj
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Labor forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. Forecasted CSR call volume - 1.42 five-year average calls per active meter x 5,621,055 forecasted active meters = 7,995,026 CSR handled calls. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

2012	0	360	0	360	0.0	1-Sided Adj
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Five-year average of historical non-labor expense per Full-Time Equivalent (FTE) multiplied by forecasted CCC Operations FTE - \$649 non-labor per FTE x 555.1 forecasted FTEs = \$360,000. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Operations Non-labor Forecast".

2012	0	0	0	0	555.1	1-Sided Adj
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Full-time Equivalent forecast for CSRs, CSR Leads, managers, supervisors, training and administrative workforce to support the forecasted workload. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "Call Volume Forecast"; "CSR Forecast"; and "CCC Operations Labor Forecast" for detailed calculations.

2012 Total	35,848	360	0	36,208	555.1	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: B. Customer Contact Center
Category-Sub: 1. Customer Contact Center - Operations
Workpaper: 2CC000.000 - CCC - Operations

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	23,892	25,179	25,143	26,233	26,776
Non-Labor	282	320	345	323	306
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	24,173	25,499	25,488	26,556	27,082
FTE	432.2	437.7	425.0	433.6	416.4
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	23,892	25,179	25,143	26,233	26,776
Non-Labor	282	320	345	323	306
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	24,173	25,499	25,488	26,556	27,082
FTE	432.2	437.7	425.0	433.6	416.4
Vacation & Sick (Nominal \$)					
Labor	4,074	4,500	4,387	5,055	4,838
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	4,074	4,500	4,387	5,055	4,838
FTE	78.0	80.2	77.4	85.7	78.7
Escalation to 2009\$					
Labor	3,340	2,616	1,765	792	0
Non-Labor	35	27	17	-1	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	3,375	2,642	1,782	792	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	31,306	32,295	31,296	32,081	31,615
Non-Labor	316	347	361	322	306
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	31,622	32,641	31,657	32,403	31,921
FTE	510.2	517.9	502.4	519.3	495.1

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. Customer Contact Center - Operations
 Workpaper: 2CC000.000 - CCC - Operations

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000)				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From Cctr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Supplemental Workpapers for Workpaper 2CC000.000

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2CC000.000 Customer Contact Center Operations
Call Volume Forecast

Year	Total CSR Calls	Average Active Meters	Calls Per Meter
2001	7,738,974	5,069,718	1.53
2002	6,653,160	5,137,054	1.30
2003	7,477,190	5,198,173	1.44
2004	7,766,802	5,266,235	1.47
2005	7,873,796	5,328,430	1.48
2006	7,911,488	5,391,974	1.47
2007	7,517,698	5,445,791	1.38
2008	8,046,339	5,466,979	1.47
2009	7,215,157	5,480,314	1.32
2010F	7,851,895	5,520,424	1.42
2011F	7,916,459	5,565,817	1.42
2012F	7,995,026	5,621,055	1.42

5 year average calls/meter = 1.42

Year	CSR Answered Calls Forecast	% Change
2009	7,215,157	
2010	7,851,895	8.8%
2011	7,916,459	0.8%
2012	7,995,026	1.0%

Annual Growth Forecast	
2010	0.7%
2011	0.8%
2012	1.0%

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2CC000.000 Customer Contact Center Operations
 CSR Forecast

	2010	2011	2012	Comments:
Annual Payroll Hours	2088	2080	2088	
Customer Service Representative (CSR) Calls Handled Forecast	7,851,895	7,916,459	7,995,026	based on forecasted active meter count
CSR Level of Service Used in Forecast	71%	71%	71%	2008 target
Occupancy	84%	84%	84%	SCG historical planning assumption
Overall Average Handle Time (AHT)	231	231	231	2009 August year-to-date AHT
Base FTEs from "Eworkforce "	288.9	291.3	294.6	
Annual Absence Shrinkage Factor (less training %)	33.0%	33.0%	33.0%	Includes all paid absences (vacation, holiday, sick, jury duty and other non productive time such as bereavement and personal business), paid breaks and water breaks
Other Staff Shrinkage	3.8%	3.9%	3.8%	Read & review, training, other non-call, non-email CSR work such as high bill call backs
Total Shrinkage	37%	37%	37%	
FTEs Required for Shrinkage	169	170	172	
Total FTEs Required with Absence & Training Shrinkage	457.6	461.4	466.2	
Less Set Desk FTEs (Capital)	-14	-14	-14	Based on 2008 (less O&C portion of FTE; 18.1 Set Desk FTE less 4.6 O&M FTE = 13.5 Capital FTE)
E-mail FTEs	10	10	10	
CSR Less Set Desk + E-mail FTEs	454	457	462	
Overtime FTEs	13	13	13	Based on average of 2007, 2008 and year-to-date September 2009
Add New CSR Training	11	11	11	
CSR FTEs	477.9	481.7	486.5	CSR FTEs (High Bill Investigation & Multi-lingual representatives) included in this total are forecast in workgroup 2CC001.000 CCC Support where the applicable cost centers and historical expense reside

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2C000.000 Customer Contact Center Operations
CSR Shrinkage Calculation

Factors		YTD 2008												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
90%	"ALL" Paid Hours	25.97%	25.45%	21.53%	24.21%	22.48%	19.40%	20.86%	19.05%	18.44%	13.80%	22.86%	23.45%	21.37%
10%	SCG - All Paid Hours Full-time	0.97%	1.09%	1.05%	0.64%	5.11%	0.59%	0.34%	0.16%	0.27%	0.27%	1.00%	0.60%	1.02%
	SCG - All Paid Hours Part-time	23.47%	23.01%	19.48%	21.85%	20.74%	17.52%	18.81%	17.16%	16.62%	12.45%	20.68%	21.16%	19.33%
	Other Breaks:													
	Breaks - Water	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%
	Breaks	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%
	Total Shrinkage	36.13%	35.67%	32.14%	34.51%	33.40%	30.18%	31.47%	29.82%	29.28%	25.11%	33.34%	33.82%	31.99%

Factors		YTD August 2009											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	YTD			
	"ALL" Paid Hours	28.93%	25.14%	22.12%	25.94%	25.95%	21.74%	20.58%	16.74%	23.41%			
	SCG - All Paid Hours Full-time	1.54%	5.99%	1.17%	1.31%	0.77%	0.74%	0.59%	0.38%	1.57%			
	SCG - All Paid Hours Part-time	26.19%	23.23%	20.03%	23.48%	23.43%	19.64%	18.58%	15.11%	21.23%			
	Other Breaks:												
	Breaks - Water	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%			
	Breaks	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%			
	Total Shrinkage	38.85%	35.89%	32.69%	36.14%	36.09%	32.30%	31.24%	27.77%	33.89%			

"ALL " includes sick, vacation, personal business and other

Factors		Used for 2010-2011 Forecast											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	SCG - All Paid Hours Full-time	28.93%	25.14%	22.12%	25.94%	25.95%	21.74%	20.58%	16.74%	18.44%	13.80%	22.86%	23.45%
	SCG - All Paid Hours Part-time	1.54%	5.99%	1.17%	1.31%	0.77%	0.74%	0.59%	0.38%	0.27%	0.27%	1.00%	0.60%
	Pronated	26.19%	23.23%	20.03%	23.48%	23.43%	19.64%	18.58%	15.11%	16.62%	12.45%	20.68%	21.16%
	Other Breaks:												
	Breaks - Water	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%	4.33%
	Breaks	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%	8.33%
	Total Shrinkage	38.85%	35.89%	32.69%	36.14%	36.09%	32.30%	31.24%	27.77%	29.28%	25.11%	33.34%	33.82%

Payroll Hours	Annualized Shrinkage												Total	Annualized Shrinkage	Other Offboard Activity (i.e., read & review)	Total	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec					
2010	168	160	184	176	168	176	176	176	176	168	176	176	184	2088	33%	4%	37%
2011	168	160	184	168	176	176	168	184	176	168	176	176	176	2080	33%	4%	37%
2012	176	168	176	168	184	168	176	184	160	184	176	168	168	2088	33%	4%	37%

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT

Workgroup 2CC000.000 Customer Contact Center Operations

CCC Operations Labor Forecast - ERRATA

	Labor Forecast		
	2010	2011	2012
<u>CSR Labor Forecast - Call Volume</u>			
Total CSR FTEs	453	457	461
Less Over-time FTEs	-13	-13	-13
	440	444	448
Full Time (FT) %	68%	68%	68%
Part Time (PT)%	32%	32%	32%
	100%	100%	100%
<u>FTE's</u>			
FT	299	302	305
OT FTEs (are FT)	13	13	13
PT	141	142	144
	453	457	461
FTE Hours in Year	2088	2080	2088
FT Hourly Rate	\$ 30.51	\$ 19,055,965	\$ 19,145,003
FT OT Hourly Rate	\$ 45.77	\$ 1,242,245	\$ 1,237,486
PT Hourly Rate	\$ 27.18	\$ 7,988,758	\$ 8,026,085
	\$ 28,286,968	\$ 28,408,574	\$ 28,814,359
<u>Other Labor Forecast</u>			
<u>FTEs</u>			
Manager	3	3	3
Supervisor	31	31	31
CSR Lead	48	48	48
Training	9	9	9
Administrative	3	3	3
Total Other FTEs	94	93	93
Hours in Year	2088	2080	2088
<u>Labor \$000s</u>			
	Hrly Rate		
Manager	\$ 52.69	\$ 330	\$ 329
Supervisor	\$ 36.85	\$ 2,366	\$ 2,357
CSR Lead	\$ 35.56	\$ 3,568	\$ 3,554
Training	\$ 34.83	\$ 633	\$ 616
Administrative	\$ 22.30	\$ 140	\$ 127
Total Other Labor \$000s	\$ 7,036	\$ 6,982	\$ 7,034
Grand Total FTEs	546	550	555
Grand Total Labor \$000s	\$ 35,323	\$ 35,390	\$ 35,848

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2CC000.000 Customer Contact Center Operations
 CCC Operations Non-labor Forecast - ERRATA

	Non Labor Per FTE - Operations (\$000)					
	2005	2006	Recorded 2007	2008	2009	Forecast 2010 2011 2012
CCC Operations Non-labor	\$316	\$347	\$361	\$322	\$306	
CCC Operations FTEs	510.2	517.9	502.4	519.3	495.1	
Non-labor Per FTE	\$0.619	\$0.670	\$0.719	\$0.620	\$0.618	
Five-Year Average Non-labor Per FTE					\$0.649	
Forecasted Non-Labor (Five-Year Average Non-labor Per FTE x Forecasted FTEs) Call Volume FTEs						546.6 549.9 555.1
Non-labor Forecast						\$355 \$357 \$360

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2C 0001.000 Customer Contact Center Support
CCC Support Communications Forecast - ERRATA

Communications Forecast Summary:

	2010	2011	2012
Sprint Telco	\$1,784,435	\$1,799,108	\$1,816,963 (a)
Outbound	\$32,220	\$32,220	\$32,220
Language Line	\$58,936	\$55,936	\$51,936
	\$1,875,590	\$1,887,263	\$1,901,118

Sprint Telco Calculation:

Average Cost Per Call 0.173
Abandoned Rate 4.2%

IVR Rate 20.4%
20.4%

	CSR Answered Calls		% of Total	
	2010	2011	2012	2012
SCG	7,851,895	7,916,459	7,995,026	100%
Jan	630,073	717,318	717,318	8.9%
Feb	663,873	699,332	674,974	8.5%
Mar	726,763	732,739	740,011	9.3%
Apr	658,468	663,883	670,471	8.4%
May	646,433	651,749	658,217	8.2%
Jun	636,061	641,291	647,655	8.1%
Jul	619,106	624,196	630,391	7.9%
Aug	641,177	646,449	652,865	8.2%
Sep	586,479	591,302	597,170	7.5%
Oct	659,264	664,685	671,282	8.4%
Nov	646,642	651,842	658,442	8.3%
Dec	677,889	683,463	690,246	8.6%
Total				

	CSR Calls Offered		2012	
	2010	2011	2010	2011
SCG	7,851,895	7,916,459	7,995,026	100%
Jan	630,073	717,318	717,318	8.9%
Feb	663,873	699,332	674,974	8.5%
Mar	726,763	732,739	740,011	9.3%
Apr	658,468	663,883	670,471	8.4%
May	646,433	651,749	658,217	8.2%
Jun	636,061	641,291	647,655	8.1%
Jul	619,106	624,196	630,391	7.9%
Aug	641,177	646,449	652,865	8.2%
Sep	586,479	591,302	597,170	7.5%
Oct	659,264	664,685	671,282	8.4%
Nov	646,642	651,842	658,442	8.3%
Dec	677,889	683,463	690,246	8.6%
Total				

	IVR Calls		2012	
	2010	2011	2010	2011
SCG	2,094,053	2,111,272	2,132,223	20.4%
Jan	177,051	178,307	180,638	8.6%
Feb	193,823	195,417	197,356	9.4%
Mar	175,609	177,053	178,811	8.6%
Apr	172,400	173,817	175,542	8.5%
May	169,634	171,028	172,726	8.4%
Jun	165,112	166,469	168,122	8.2%
Jul	170,998	172,404	174,115	8.3%
Aug	156,410	157,697	159,262	7.9%
Sep	175,382	177,260	179,027	8.6%
Oct	171,427	173,427	175,427	8.4%
Nov	180,789	182,275	184,084	8.8%
Dec				
Total				

	CSR-IVR Offered		2012	
	2010	2011	2010	2011
SCG	10,280,186	10,374,799	10,477,764	
Jan	838,083	877,183	888,888	
Feb	870,029	900,280	909,811	
Mar	862,946	870,042	878,676	
Apr	847,173	854,139	862,616	
May	833,580	840,434	848,775	
Jun	811,360	818,031	826,150	
Jul	840,288	847,195	855,603	
Aug	768,602	774,922	782,612	
Sep	863,989	871,093	879,738	
Oct	846,642	854,642	862,642	
Nov	888,307	896,702	904,922	
Dec				
Total				

	\$ Telco - Sprint		2012	
	2010	2011	2010	2011
SCG	\$1,784,435	\$1,799,108	\$1,816,963	(a)
Jan	\$143,564	\$152,018	\$157,566	
Feb	\$150,873	\$152,113	\$153,625	
Mar	\$165,165	\$166,523	\$168,176	
Apr	\$149,645	\$150,875	\$152,372	
May	\$146,909	\$148,117	\$149,587	
Jun	\$144,552	\$145,741	\$147,187	
Jul	\$140,699	\$141,856	\$143,264	
Aug	\$145,715	\$146,913	\$148,371	
Sep	\$133,284	\$134,380	\$135,714	
Oct	\$149,825	\$151,057	\$152,557	
Nov	\$154,058	\$155,325	\$156,866	
Dec				
Total				

SUMMARY OF HISTORICAL & FORECAST COMMUNICATIONS EXPENSE -

Communications Expense In 2009 \$000s	Recorded		Forecast	
	2005	2006	2010	2011
Communications Expense	\$ 2,067	\$ 1,569	\$ 1,675	\$ 1,887
5 Year-Average (embedded in total five-year average non-labor forecast)	\$	\$ 1,521	\$ 1,684	\$ 1,901
Incremental Communications Expense			\$192	\$202
			\$202	\$217

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Workgroup 2CC001.000 Customer Contact Center Support
 CCC Support Annual Maintenance Forecast

Vendor	2009 Actual	2010 Forecast	2011 Forecast	2012 Forecast
Aspect	\$ 255,519	\$ 31,800	\$ 31,800	\$ 31,800
KANA Response	\$ -	\$ 34,000	\$ 34,000	\$ 34,000
NICE System	\$ 92,650	\$ 86,490	\$ 86,490	\$ 86,490
Virtual Hold	\$ 27,531	\$ 17,000	\$ 17,000	\$ 17,000
SynTellect	\$ 94,684	\$ -	\$ -	\$ -
Quest Software	\$ -	\$ 25,000	\$ 25,000	\$ 25,000
Visual Electronics	\$ -	\$ 8,700	\$ 8,700	\$ 8,700
Genesys Software	\$ -	\$ 367,691	\$ 367,691	\$ 367,691
Avaya	\$ 19,657	\$ 262,937	\$ 262,937	\$ 262,937
Miscellaneous Charge	\$ 620	\$ -	\$ -	\$ -
High Bill Analyzer	\$ -	\$ 58,940	\$ 58,940	\$ 58,940
New IVR/Services Channel Analytics - ClickFox	\$ -	\$ 33,600	\$ 33,600	\$ 33,600
Speech Analytics - Nexidia	\$ -	\$ 35,000	\$ 35,000	\$ 35,000
Root Cause Analytics	\$ -	\$ -	\$ -	\$ -
Total SCG	\$ 490,661	\$ 961,158	\$ 1,186,158	\$ 1,186,158

SUMMARY OF HISTORICAL & FORECAST ANNUAL MAINTENANCE EXPENSE

Annual Maintenance Expense In 2009 \$000s	Recorded					Forecast		
	2005	2006	2007	2008	2009	2010	2011	2012
Annual Maintenance Expense	\$ -	\$ 459	\$ 507	\$ 625	\$ 491	\$ 961	\$ 1,186	\$ 1,186
5 Year-Average (embedded in total five-year average non-labor forecast)					\$ -			\$ 567
Incremental Annual Maintenance Expense						\$ 394	\$ 619	\$ 619

**Beginning of Workpaper
2CC001.000 - CCC - Support**

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 2. Customer Contact Center - Support
 Workpaper: 2CC001.000 - CCC - Support

Activity Description:

Customer Contact Center (CCC) Support cost center activities include resource planning and scheduling, technology support, training, quality assurance, policy and procedures support, planning and analysis functions and clerical functions.

Forecast Methodology:

Labor - 5-YR Average

The CCC Support cost center workgroup's TY 2012 estimated labor expenses are based on the five-year average of adjusted recorded expenses. Using a five-year average captures the high and low expenditures seen over an extended period of time. The five-year average forecast is adjusted for known changes in the organization that are not reflected in the historical average.

Non-Labor - 5-YR Average

The CCC Support cost center workgroup's TY 2012 estimated non-labor expenses are based on the five-year average of adjusted recorded expenses. Using a five-year average captures the high and low expenditures seen over an extended period of time. The five-year average is adjusted for known changes to communications and software and hardware maintenance expenses.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

Years	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Labor	6,458	6,476	6,323	6,218	6,274	6,455	6,455	6,455	
Non-Labor	4,074	2,828	2,323	2,425	2,383	3,392	3,627	3,642	
NSE	0	0	0	0	0	0	0	0	
Total	10,532	9,304	8,646	8,643	8,657	9,847	10,082	10,097	
FTE	94.1	93.8	92.8	91.3	92.2	93.8	93.8	93.8	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 2. Customer Contact Center - Support
 Workpaper: 2CC001.000 - CCC - Support

Forecast Summary:

		In 2009 \$(000)								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	5-YR Average	6,349	6,349	6,349	106	106	106	6,455	6,455	6,455
Non-Labor	5-YR Average	2,806	2,806	2,806	586	821	836	3,392	3,627	3,642
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		9,155	9,155	9,155	692	927	942	9,847	10,082	10,097
FTE	5-YR Average	92.8	92.8	92.8	1.0	1.0	1.0	93.8	93.8	93.8

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	0	586	0	586	0.0	1-Sided Adj

Incremental non-labor over what is embedded in the five-year average of historical expense forecasted non-labor. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Support Communications Forecast" and "CCC Support Annual Maintenance Forecast" for detailed calculations.

Breakdown of incremental non-labor expense:

- 1) \$192 communications (Telco) increase
- 2) \$394 software and hardware maintenance

2010	106	0	0	106	0.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2010	0	0	0	0	1.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2010 Total	106	586	0	692	1.0	
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2011	0	821	0	821	0.0	1-Sided Adj
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 2. Customer Contact Center - Support
 Workpaper: 2CC001.000 - CCC - Support

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
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Incremental non-labor over what is embedded in the five-year average of historical expense forecasted non-labor. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Support Communications Forecast" and "CCC Support Annual Maintenance Forecast" for detailed calculations.

Breakdown of incremental non-labor expense:

- 1) \$202 communications (Telco) increase
- 2) \$619 software and hardware maintenance

2011	106	0	0	106	0.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2011	0	0	0	0	1.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2011 Total	106	821	0	927	1.0	
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2012	0	836	0	836	0.0	1-Sided Adj
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Incremental non-labor over what is embedded in the five-year average of historical expense forecasted non-labor. See Supplemental Workpaper 2CC000.000_Supp1.pdf, "CCC Support Communications Forecast" and "CCC Support Annual Maintenance Forecast" for detailed calculations.

Breakdown of incremental non-labor expense:

- 1) \$217 communications (Telco) increase
- 2) \$619 software and hardware maintenance

2012	106	0	0	106	0.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2012	0	0	0	0	1.0	1-Sided Adj
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Incremental analyst to support new software applications implemented in the CCC as a result of the Operational Excellence Project.

2012 Total	106	836	0	942	1.0	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: B. Customer Contact Center
Category-Sub: 2. Customer Contact Center - Support
Workpaper: 2CC001.000 - CCC - Support

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	4,928	5,049	5,080	5,084	5,314
Non-Labor	3,629	2,611	2,216	2,918	2,916
NSE	0	0	0	0	0
Total	8,557	7,660	7,296	8,002	8,230
FTE	79.7	79.3	78.5	76.2	77.5
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	-487	-533
NSE	0	0	0	0	0
Total	0	0	0	-487	-533
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	4,928	5,049	5,080	5,084	5,314
Non-Labor	3,629	2,611	2,216	2,431	2,383
NSE	0	0	0	0	0
Total	8,557	7,660	7,296	7,516	7,697
FTE	79.7	79.3	78.5	76.2	77.5
Vacation & Sick (Nominal \$)					
Labor	840	902	886	980	960
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	840	902	886	980	960
FTE	14.4	14.5	14.3	15.1	14.7
Escalation to 2009\$					
Labor	689	525	357	154	0
Non-Labor	445	217	107	-6	0
NSE	0	0	0	0	0
Total	1,134	742	463	148	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	6,458	6,476	6,323	6,218	6,274
Non-Labor	4,074	2,828	2,323	2,425	2,383
NSE	0	0	0	0	0
Total	10,531	9,304	8,646	8,643	8,657
FTE	94.1	93.8	92.8	91.3	92.2

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 2. Customer Contact Center - Support
 Workpaper: 2CC001.000 - CCC - Support

Summary of Adjustments to Recorded:

In Nominal \$ (000)						
Year	2005	2006	2007	2008	2009	
Labor	0	0	0	0	0	0
Non-Labor	0	0	0	-487	-533	
NSE	0	0	0	0	0	
Total	0	0	0	-487	-533	
FTE	0.0	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008	0	-487	0	0.0	1-Sided Adj	N/A	TP1CAH2009091 8095735110
Exclude Katz patent infringement settlement charges from cost center 2200-0404 CCC Technology Support Workpaper Group.							
2008 Total	0	-487	0	0.0			
2009	0	-533	0	0.0	1-Sided Adj	N/A	TP1CAH2010031 2124554380
Exclude 2009 Katz patent infringement settlement charges from cost center 2200-0404, Technology Support workpaper group.							
2009 Total	0	-533	0	0.0			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Branch Offices & Authorized Payment Locations
 Workpaper: 2BO000.000

Summary for Category: C. Branch Offices & Authorized Payment Locations

	In 2009\$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	7,664	8,013	8,013	8,013
Non-Labor	2,473	3,122	3,122	3,122
NSE	0	0	0	0
Total	10,137	11,135	11,135	11,135
FTE	129.1	136.5	136.5	136.5

Workpapers belonging to this Category:

2BO000.000 Branch Office and Authorized Pay Location Operations

Labor	7,664	8,013	8,013	8,013
Non-Labor	2,473	3,122	3,122	3,122
NSE	0	0	0	0
Total	10,137	11,135	11,135	11,135
FTE	129.1	136.5	136.5	136.5

Beginning of Workpaper
2BO000.000 - Branch Office and Authorized Pay Location Operations

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Branch Offices & Authorized Payment Locations
 Category-Sub: 1. Branch Offices & Authorized Payment Locations
 Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

Activity Description:

Labor and non-labor costs associated with Branch Office and Authorized Pay Location expenses, covering the cost of providing payment collection and other services to those customers who deal in-person for payments, service requests and information.

Forecast Methodology:

Labor - 5-YR Average

Work volumes in the Branch Offices are driven by fluctuations in "in-person" customer payments, service establishment and service order requests. It is logical to project the base future expenses by using a five-year historical average to encompass the fluctuations in work flow volumes over a reasonable timeframe.

Non-Labor - 5-YR Average

Work volumes in the Branch Offices are driven by fluctuations in "in-person" customer payments, service establishment and service order requests. It is logical to project the base future expenses by using a five-year historical average to encompass the fluctuations in work flow volumes over a reasonable timeframe.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Years									
Labor	7,751	7,679	7,524	7,602	7,664	8,013	8,013	8,013	
Non-Labor	2,736	2,513	2,562	2,587	2,473	3,122	3,122	3,122	
NSE	0	0	0	0	0	0	0	0	
Total	10,487	10,192	10,086	10,189	10,137	11,135	11,135	11,135	
FTE	133.1	131.8	129.1	130.2	129.1	136.5	136.5	136.5	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: C. Branch Offices & Authorized Payment Locations
Category-Sub: 1. Branch Offices & Authorized Payment Locations
Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	7,644	7,644	7,644	369	369	369	8,013	8,013	8,013
Non-Labor	5-YR Average	2,574	2,574	2,574	548	548	548	3,122	3,122	3,122
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		10,218	10,218	10,218	917	917	917	11,135	11,135	11,135
FTE	5-YR Average	130.7	130.7	130.7	5.8	5.8	5.8	136.5	136.5	136.5

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	275	0	0	275	0.0	1-Sided Adj

"RedFlag" implementation requires- 1) Authorized Payment Locations incremental labor support 1 FTE x \$69,500 average annual salary; and 2) Branch Office incremental labor supporting additional activities 3.3 FTE's X \$62,000 average annual salary. See Supplemental Workpaper 2BO000.000_Supp1.pdf, ""FACTA Red Flag Forecast" for detailed calculations.

2010	0	63	0	63	0.0	1-Sided Adj
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"RedFlag" implementation requires incremental non-labor for Authorized Payment Locations vendor service fees - \$62,900. See Supplemental Workpaper 2BO000.000_Supp1.pdf, ""FACTA Red Flag Forecast" for detailed calculations.

2010	0	0	0	0	4.3	1-Sided Adj
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"RedFlag" implementation requires- 1) Authorized Payment Locations incremental labor support 1 FTE; and 2) Branch Office incremental labor supporting additional activities 3.3 FTE's. See Supplemental Workpaper 2BO000.000_Supp1.pdf, ""FACTA Red Flag Forecast" for detailed calculations.

2010	0	475	0	475	0.0	1-Sided Adj
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Twelve additional Branch Office locations require security guards to be in compliance with Union agreement- \$3,300 per month X 12 months X 12 locations.

2010	94	0	0	94	0.0	1-Sided Adj
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1) Full year impact of Branch Office positions filled in 2009 - \$19,000 labor; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$75,000. See Supplemental Workpaper 2BO000.000_Supp1.pdf, ""Full Year Effect-Staffing" for detailed calculations.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Branch Offices & Authorized Payment Locations
 Category-Sub: 1. Branch Offices & Authorized Payment Locations
 Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2010	0	10	0	10	0.0	1-Sided Adj

Miscellaneous non-labor expense associated with 1) full year impact of Branch Office positions filled in 2009 - \$2,000; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$8,000.

2010	0	0	0	0	1.5	1-Sided Adj
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1) Full year impact of Branch Office positions filled in 2009 - 0.2 FTE; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - 1.3 FTE. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "Full Year Effect-Staffing" for detailed calculations.

2010 Total	369	548	0	917	5.8	
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2011	275	0	0	275	0.0	1-Sided Adj
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"RedFlag" implementation requires- 1) Authorized Pay Locations incremental labor support 1 FTE x \$69,500 average annual salary; and 2) Branch Office incremental labor, supporting additional activities 3.3 FTE's X \$62,000 average annual salary. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2011	0	63	0	63	0.0	1-Sided Adj
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"RedFlag" implementation requires incremental non-labor for Authorized Pay Locations vendor service fees - \$62,900. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2011	0	0	0	0	4.3	1-Sided Adj
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"RedFlag" implementation requires- 1) Authorized Pay Locations incremental labor support 1 FTE; and 2) Branch Office incremental labor, supporting additional activities 3.3 FTE's. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2011	0	475	0	475	0.0	1-Sided Adj
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Twelve additional Branch Office locations require security guards to be in compliance with Union agreement- \$3,300 per month X 12 months X 12 locations.

2011	94	0	0	94	0.0	1-Sided Adj
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1) Full year impact of Branch Office positions filled in 2009 - \$19,000 labor; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$75,000. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "Full Year Effect-Staffing" for detailed calculations.

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 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Branch Offices & Authorized Payment Locations
 Category-Sub: 1. Branch Offices & Authorized Payment Locations
 Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011	0	10	0	10	0.0	1-Sided Adj

Miscellaneous non-labor expense associated with 1) full year impact of Branch Office positions filled in 2009 - \$2,000; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$8,000.

2011	0	0	0	0	1.5	1-Sided Adj
------	---	---	---	---	-----	-------------

1) Full year impact of Branch Office positions filled in 2009 - 0.2 FTE; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - 1.3 FTE. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "Full Year Effect-Staffing" for detailed calculations.

2011 Total	369	548	0	917	5.8	
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2012	275	0	0	275	0.0	1-Sided Adj
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"RedFlag" implementation requires- 1) Authorized Pay Locations incremental labor support 1 FTE x \$69,500 average annual salary; and 2) Branch Office incremental labor, supporting additional activities 3.3 FTE's X \$62,000 average annual salary. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2012	0	63	0	63	0.0	1-Sided Adj
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"RedFlag" implementation requires incremental non-labor for Authorized Pay Locations vendor service fees - \$62,900. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2012	0	0	0	0	4.3	1-Sided Adj
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"RedFlag" implementation requires- 1) Authorized Pay Locations incremental labor support 1 FTE; and 2) Branch Office incremental labor, supporting additional activities 3.3 FTE's. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "FACTA Red Flag Forecast" for detailed calculations.

2012	0	475	0	475	0.0	1-Sided Adj
------	---	-----	---	-----	-----	-------------

Twelve additional Branch Office locations require security guards to be in compliance with Union agreement- \$3,300 per month X 12 months X 12 locations.

2012	94	0	0	94	0.0	1-Sided Adj
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1) Full year impact of Branch Office positions filled in 2009 - \$19,000 labor; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$75,000. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "Full Year Effect-Staffing" for detailed calculations.

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Branch Offices & Authorized Payment Locations
 Category-Sub: 1. Branch Offices & Authorized Payment Locations
 Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	0	10	0	10	0.0	1-Sided Adj

Miscellaneous non-labor expense associated with 1) full year impact of Branch Office positions filled in 2009 - \$2,000; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - \$8,000.

2012	0	0	0	0	1.5	1-Sided Adj
------	---	---	---	---	-----	-------------

1) Full year impact of Branch Office positions filled in 2009 - 0.2 FTE; and, 2) full year effect of full-time staffing over part-time staffing in the Branch Offices - 1.3 FTE. See Supplemental Workpaper 2BO000.000_Supp1.pdf, "Full Year Effect-Staffing" for detailed calculations.

2012 Total	369	548	0	917	5.8	
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: C. Branch Offices & Authorized Payment Locations
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Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	5,617	5,877	6,047	6,216	6,491
Non-Labor	2,372	2,330	2,444	2,593	2,473
NSE	0	0	0	0	0
Total	7,989	8,207	8,491	8,809	8,964
FTE	108.6	109.7	109.2	108.7	108.6
Adjustments (Nominal \$) **					
Labor	298	110	-2	0	0
Non-Labor	65	-10	0	0	0
NSE	0	0	0	0	0
Total	363	100	-2	0	0
FTE	4.2	1.7	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	5,915	5,987	6,045	6,216	6,491
Non-Labor	2,437	2,320	2,444	2,593	2,473
NSE	0	0	0	0	0
Total	8,352	8,307	8,489	8,809	8,964
FTE	112.8	111.4	109.2	108.7	108.6
Vacation & Sick (Nominal \$)					
Labor	1,009	1,070	1,055	1,198	1,173
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	1,009	1,070	1,055	1,198	1,173
FTE	20.3	20.4	19.9	21.5	20.5
Escalation to 2009\$					
Labor	827	622	424	188	0
Non-Labor	299	193	118	-6	0
NSE	0	0	0	0	0
Total	1,126	815	542	181	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	7,751	7,679	7,524	7,602	7,664
Non-Labor	2,736	2,513	2,562	2,587	2,473
NSE	0	0	0	0	0
Total	10,487	10,192	10,086	10,188	10,137
FTE	133.1	131.8	129.1	130.2	129.1

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

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 Workpaper: 2BO000.000 - Branch Office and Authorized Pay Location Operations

Summary of Adjustments to Recorded:

In Nominal \$ (000)					
Year	2005	2006	2007	2008	2009
Labor	298	110	-2	0	0
Non-Labor	65	-10	0	0	0
NSE	0	0	0	0	0
Total	363	100	-2	0	0
FTE	4.2	1.7	0.0	0.0	0.0

Detail of Adjustments to Recorded:

Year/Expl.	Labor	NLbr	NSE	FTE	Adi Type	From CCtr	RefID
2005	254	0	0	0.0	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5121451697
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2005	0	65	0	0.0	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5121531040
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2005	0	0	0	3.7	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5121602400
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2005	44	0	0	0.0	CCTR Transf	From 2200-0413.000	SDALEY2010042 0064814790
Residential Services organization has been restructured. Branch Office employee's labor should be moved from NSS cost center 2200-0413 to NSS cost center 2200-2196 Branch Office Regional Supervisor 2 to align with current org.							
2005	0	0	0	0.5	CCTR Transf	From 2200-0413.000	SDALEY2010042 0073225540
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2196 Branch Office Regional Supervisor 2 to align with current org.							
2005 Total	298	65	0	4.2			

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<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	110	0	0	0.0	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5121925133
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2006	0	-10	0	0.0	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5122003180
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2006	0	0	0	1.7	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5122023757
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2006 Total	110	-10	0	1.7			
2007	-2	0	0	0.0	CCTR Transfer	From 2200-0413.000	SDALEY2010041 5122214007
Residential Services Organization has been restructured. Branch Office employees' labor and non-labor should be moved from NSS cost center 2200-0413 into NSS cost center 2200-2050 Branch Office Operations Manager to align with current org.							
2007 Total	-2	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Supplemental Workpapers for Workpaper 2BO000.000

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2BO000.000 Branch Offices & Authorized Pay Locations (APLs)
 FACTA Red Flag Forecast

Incremental FTE's due to Red Flag Implementation (Fair & Accurate Credit Transactions Act-FACTA)

- Implementation pending
- Forecast based on the following assumptions:

	<u>Total</u>	<u>In \$Thousands</u>	<u>Labor</u>	<u>N-Labor</u>	
1 Each transaction per ofc		3.5			minutes
2 Transactions per day per ofc		10			transactions
3 Incremental minutes per day per ofc		35			minutes
4 Annual work days		251			days
5 Incremental minutes per year per ofc		8,785			minutes
6 Incremental Branch Office FTE's per year per ofc		0.070			FTE's
7 Number of Branch Offices		47.00			offices
8 Incremental Branch Office FTE's per year		3.3			FTE's
9 Average Branch Office FTE's salary		\$62			annual
10 Incremental labor costs at Branch Offices		\$205			annual
11 Incremental Analyst/Specialist FTE per year		1.0			FTE's
12 Analyst/Specialist to assist with APL's		\$70			annual
13 Total incremental FTE's		4.3			FTE's
14 Total incremental labor support		\$275			annual labor
15 APL's incremental fees for each Positive Identification (POSID)		\$0.36			cents per transaction
16 Transactions per month per location		104			transactions
17 Transactions per year per location		1,248			transactions
18 Number of APL's		210			locations
19 Ratio of POSID active APL's		2/3			of total locations
20 Transactions per month at POSID active APL's		174,720			transactions
21 Incremental APL's non-labor costs		\$63			annual non-labor

- Based on SDG&E's average of from 5 to 15 per day per office
- minutes per year / 60 minutes = hours per year / 2088 hours = FTE
- Analyst/Specialist Market Reference Range (MMR) \$55,600 - \$83,400
- \$0.31 each transaction - plus, \$0.05 per image stored
- Most APL's open 6 days a week X 4 transactions per day

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2BO000.000 Branch Offices & Authorized Pay Locations (APLs)
 Full Year Effect - Staffing

• Cyclical full-time vacancies back-filled
 by part-time workforce until filled by Oct 2009

Area	Cost Center	Vacancies filled effective Oct 2009	FTE's	Increment Due to Full-Time Vacation & Sick 20%	Previously Back Filled By Part-Time	Increment Due to Full-Time Staffing	FTE's	Increment Due to Full-Year Impact	FTE's	In \$Thousands	
										Labor	Non-labor
1	2200-0416	Santa Fe Springs => 1 CCR Grade-6 Bilingual & 1 CCR Grade-4	2	0.4	75%	0.5	0.9	3/4	0.7		
2	2200-0417	Bimontal									
3	2200-0418	Monrovia => 1 CCR Grade-4 Bil & Pasadena => 1 CCR Grade-4	2	0.4	100%	0.4	0.4	3/4	0.3		
4	2200-0419										
5	2200-0420	Delano => 1 CCR-4 Bil	1	0.2	100%	0.2	0.2	3/4	0.2		
6	2200-0421										
7	2200-0405										
8	2200-0415	Santa Monica => 1 CCR-4	1	0.2	100%	0.2	0.2	3/4	0.2		
		Sub-total Area 1 through 8 Cost Center					1.3		1.3	\$ 75	\$ 83
											• average annual salary \$ 57,700 • average non-labor per FTE \$ 6,000
	Cost Center										
Area	2200-0414	full year effect					0.1		0.1		
APL Mgr	2200-2196	full year effect					0.1		0.1		
Regional Supvr							0.2		0.2	\$ 19	\$ 2
		Sub-total APL & Regional Supvr Cost Center									
											• average annual salary \$ 92,500 • average non-labor per FTE; \$ 24,000 applicable to 2200-0414 only
		Grand Total - Full Year Impact - Vacancies and Midyear Hires					1.5		1.5	\$ 94	\$ 104

**Exhibit SCG-07-WP
Branch Offices and Authorized Payment Locations**

**2BO000.000_Supp2
Fair and Accurate Credit Transaction Act (FACTA)
Appendix J**



Federal Register

Friday,
November 9, 2007

Part IV

Department of the Treasury
Office of the Comptroller of the
Currency

12 CFR Part 41

Federal Reserve System

12 CFR Part 222

Federal Deposit Insurance
Corporation

12 CFR Parts 334 and 364

Department of the Treasury
Office of Thrift Supervision

12 CFR Part 571

National Credit Union
Administration

12 CFR Part 717

Federal Trade Commission

16 CFR Part 681

Identity Theft Red Flags and Address
Discrepancies Under the Fair and
Accurate Credit Transactions Act of 2003;
Final Rule

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Non-Shared Service Workpapers

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DEPARTMENT OF THE TREASURY

Office of the Comptroller of the Currency

12 CFR Part 41

[Docket ID OCC-2007-0017]

RIN 1557-AC87

FEDERAL RESERVE SYSTEM

12 CFR Part 222

[Docket No. R-1255]

FEDERAL DEPOSIT INSURANCE CORPORATION

12 CFR Parts 334 and 364

RIN 3064-AD00

DEPARTMENT OF THE TREASURY

Office of Thrift Supervision

12 CFR Part 571

[Docket No. OTS-2007-0019]

RIN 1550-AC04

NATIONAL CREDIT UNION ADMINISTRATION

12 CFR Part 717

FEDERAL TRADE COMMISSION

16 CFR Part 681

RIN 3084-AA94

Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003

AGENCIES: Office of the Comptroller of the Currency, Treasury (OCC); Board of Governors of the Federal Reserve System (Board); Federal Deposit Insurance Corporation (FDIC); Office of Thrift Supervision, Treasury (OTS); National Credit Union Administration (NCUA); and Federal Trade Commission (FTC or Commission).

ACTION: Joint final rules and guidelines.

SUMMARY: The OCC, Board, FDIC, OTS, NCUA and FTC (the Agencies) are jointly issuing final rules and guidelines implementing section 114 of the Fair and Accurate Credit Transactions Act of 2003 (FACT Act) and final rules implementing section 315 of the FACT Act. The rules implementing section 114 require each financial institution or creditor to develop and implement a written Identity Theft Prevention Program (Program) to detect, prevent,

and mitigate identity theft in connection with the opening of certain accounts or certain existing accounts. In addition, the Agencies are issuing guidelines to assist financial institutions and creditors in the formulation and maintenance of a Program that satisfies the requirements of the rules. The rules implementing section 114 also require credit and debit card issuers to assess the validity of notifications of changes of address under certain circumstances. Additionally, the Agencies are issuing joint rules under section 315 that provide guidance regarding reasonable policies and procedures that a user of consumer reports must employ when a consumer reporting agency sends the user a notice of address discrepancy.

DATES: The joint final rules and guidelines are effective January 1, 2008. The mandatory compliance date for this rule is November 1, 2008.

FOR FURTHER INFORMATION CONTACT:

OCC: Amy Friend, Assistant Chief Counsel, (202) 874-5200; Deborah Katz, Senior Counsel, or Andra Shuster, Special Counsel, Legislative and Regulatory Activities Division, (202) 874-5090; Paul Utterback, Compliance Specialist, Compliance Department, (202) 874-5461; or Aida Plaza Carter, Director, Bank Information Technology, (202) 874-4740, Office of the Comptroller of the Currency, 250 E Street, SW., Washington, DC 20219.

Board: David A. Stein or Ky Tran-Trong, Counsels, or Amy Burke, Attorney, Division of Consumer and Community Affairs, (202) 452-3667; Kara L. Handzlik, Attorney, Legal Division, (202) 452-3852; or John Gibbons, Supervisory Financial Analyst, Division of Banking Supervision and Regulation, (202) 452-6409, Board of Governors of the Federal Reserve System, 20th and C Streets, NW., Washington, DC 20551.

FDIC: Jeffrey M. Kopchik, Senior Policy Analyst, (202) 898-3872, or David P. Laffleur, Policy Analyst, (202) 898-6569, Division of Supervision and Consumer Protection; Richard M. Schwartz, Counsel, (202) 898-7424, or Richard B. Foley, Counsel, (202) 898-3784, Legal Division, Federal Deposit Insurance Corporation, 550 17th Street, NW., Washington, DC 20429.

OTS: Ekita Mitchell, Consumer Regulations Analyst, Compliance and Consumer Protection, (202) 906-6451; Kathleen M. McNulty, Technology Program Manager, Information Technology Risk Management, (202) 906-6322; or Richard Bennett, Senior Compliance Counsel, Regulations and Legislation Division, (202) 906-7409,

Office of Thrift Supervision, 1700 G Street, NW., Washington, DC 20552.

NCUA: Regina M. Metz, Staff Attorney, Office of General Counsel, (703) 518-6540, National Credit Union Administration, 1775 Duke Street, Alexandria, VA 22314-3428.

FTC: Naomi B. Lefkowitz, Attorney, or Pavneet Singh, Attorney, Division of Privacy and Identity Protection, Bureau of Consumer Protection, (202) 326-2252, Federal Trade Commission, 600 Pennsylvania Avenue, NW., Washington DC 20580.

SUPPLEMENTARY INFORMATION:

I. Introduction

The President signed the FACT Act into law on December 4, 2003.¹ The FACT Act added several new provisions to the Fair Credit Reporting Act of 1970 (FCRA), 15 U.S.C. 1681 *et seq.* Section 114 of the FACT Act, 15 U.S.C. 1681m(e), amends section 615 of the FCRA, and directs the Agencies to issue joint regulations and guidelines regarding the detection, prevention, and mitigation of identity theft, including special regulations requiring debit and credit card issuers to validate notifications of changes of address under certain circumstances.² Section 315 of the FACT Act, 15 U.S.C. 1681c(h), adds a new section 605(h)(2) to the FCRA requiring the Agencies to issue joint regulations that provide guidance regarding reasonable policies and procedures that a user of a consumer report should employ when the user receives a notice of address discrepancy.

On July 18, 2006, the Agencies published a joint notice of proposed rulemaking (NPRM) in the **Federal Register** (71 FR 40786) proposing rules and guidelines to implement section 114 and proposing rules to implement section 315 of the FACT Act. The public comment period closed on September 18, 2006. The Agencies collectively received a total of 129 comments in response to the NPRM, although many commenters sent copies of the same letter to each of the Agencies. The comments included 63 from financial institutions, 12 from financial institution holding companies, 23 from financial institution trade associations, 12 from individuals, nine from other trade associations, five from other business entities, three from consumer

¹ Pub. L. 108-159.

² Section 111 of the FACT Act defines "identity theft" as "a fraud committed using the identifying information of another person, subject to such further definition as the [Federal Trade] Commission may prescribe, by regulation." 15 U.S.C. 1681a(q)(3).

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groups,³ one from a member of Congress, and one from the United States Small Business Administration (SBA).

II. Section 114 of the FACT Act

A. Red Flag Regulations and Guidelines

1. Background

Section 114 of the FACT Act requires the Agencies to jointly issue guidelines for financial institutions and creditors regarding identity theft with respect to their account holders and customers. Section 114 also directs the Agencies to prescribe joint regulations requiring each financial institution and creditor to establish reasonable policies and procedures for implementing the guidelines, to identify possible risks to account holders or customers or to the safety and soundness of the institution or "customer."⁴

In developing the guidelines, the Agencies must identify patterns, practices, and specific forms of activity that indicate the possible existence of identity theft. The guidelines must be updated as often as necessary, and cannot be inconsistent with the policies and procedures issued under section 326 of the USA PATRIOT Act,⁵ 31 U.S.C. 5318(l), that require verification of the identity of persons opening new accounts. The Agencies also must consider including reasonable guidelines that would apply when a transaction occurs in connection with a consumer's credit or deposit account that has been inactive for two years. These guidelines would provide that in such circumstances, a financial institution or creditor "shall follow reasonable policies and procedures" for notifying the consumer, "in a manner reasonably designed to reduce the likelihood of identity theft."

2. Overview of Proposal and Comments Received

The Agencies proposed to implement section 114 through regulations requiring each financial institution and creditor to implement a written Program to detect, prevent and mitigate identity theft in connection with the opening of an account or any existing account. The Agencies also proposed guidelines that identified 31 patterns, practices, and specific forms of activity that indicate a possible risk of identity theft. The proposed regulations required each financial institution and creditor to incorporate into its Program relevant

³ One of these letters represented the comments of five consumer groups.

⁴ Use of the term "customer," here, appears to be a drafting error and likely should read "creditor."

⁵ Pub. L. 107-56.

indicators of a possible risk of identity theft (Red Flags), including indicators from among those listed in the guidelines. To promote flexibility and responsiveness to the changing nature of identity theft, the proposed rules also stated that covered entities would need to include in their Programs relevant Red Flags from applicable supervisory guidance, their own experiences, and methods that the entity had identified that reflect changes in identity theft risks.

The Agencies invited comment on all aspects of the proposed regulations and guidelines implementing section 114, and specifically requested comment on whether the elements described in section 114 had been properly allocated between the proposed regulations and the proposed guidelines.

Consumer groups maintained that the proposed regulations provided too much discretion to financial institutions and creditors to decide which accounts and Red Flags to include in their Programs and how to respond to those Red Flags. These commenters stated that the flexible and risk-based approach taken in the proposed rulemaking would permit "business as usual."

Some small financial institutions also expressed concern about the flexibility afforded by the proposal. These commenters stated that they preferred to have clearer, more structured guidance describing exactly how to develop and implement a Program and what they would need to do to achieve compliance.

Most commenters, however, including many financial institutions and creditors, asserted that the proposal was overly prescriptive, contained requirements beyond those mandated in the FACT Act, would be costly and burdensome to implement, and would complicate the existing efforts of financial institutions and creditors to detect and prevent identity theft. Some industry commenters asserted that the rulemaking was unnecessary because large businesses, such as banks and telecommunications companies, already are motivated to prevent identity theft and other forms of fraud in order to limit their own financial losses. Financial institution commenters maintained that they are already doing most of what would be required by the proposal as a result of having to comply with the customer identification program (CIP) regulations implementing section 326 of the USA PATRIOT Act⁶ and other existing requirements. These

⁶ See, e.g., 31 CFR 103.121 (applicable to banks, thrifts and credit unions and certain non-federally regulated banks).

commenters suggested that the regulations and guidelines take the form of broad objectives modeled on the objectives set forth in the "Interagency Guidelines Establishing Information Security Standards" (Information Security Standards).⁷ A few financial institution commenters asserted that the primary cause of identity theft is the lack of care on the part of the consumer. They stated that consumers should be held responsible for protecting their own identifying information.

The Agencies have modified the proposed rules and guidelines in light of the comments received. An overview of the final rules, guidelines, and supplement, a discussion of the comments, and the specific manner in which the proposed rules and guidelines have been modified, follows.

3. Overview of final rules and guidelines

The Agencies are issuing final rules and guidelines that provide both flexibility and more guidance to financial institutions and creditors. The final rules also require the Program to address accounts where identity theft is most likely to occur. The final rules describe which financial institutions and creditors are required to have a Program, the objectives of the Program, the elements that the Program must contain, and how the Program must be administered.

Under the final rules, only those financial institutions and creditors that offer or maintain "covered accounts" must develop and implement a written Program. A covered account is (1) an account primarily for personal, family, or household purposes, that involves or is designed to permit multiple payments or transactions, or (2) any other account for which there is a reasonably foreseeable risk to customers or the safety and soundness of the financial institution or creditor from identity theft. Each financial institution and creditor must periodically determine whether it offers or maintains a "covered account."

The final regulations provide that the Program must be designed to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing covered account. In addition, the Program must be tailored to the entity's size, complexity and nature of its operations.

⁷ 12 CFR part 30, app. B (national banks); 12 CFR part 208, app. D-2 and part 225, app. F (state member banks and holding companies); 12 CFR part 364, app. B (state non-member banks); 12 CFR part 570, app. B (savings associations); 12 CFR part 748, App. A (credit unions).

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phone account, utility account, checking account, or savings account; and

(ii) Any other account that the financial institution or creditor offers or maintains for which there is a reasonably foreseeable risk to customers or to the safety and soundness of the financial institution or creditor from identity theft, including financial, operational, compliance, reputation, or litigation risks.

(4) *Credit* has the same meaning as in 15 U.S.C. 1681a(r)(5).

(5) *Creditor* has the same meaning as in 15 U.S.C. 1681a(r)(5), and includes lenders such as banks, finance companies, automobile dealers, mortgage brokers, utility companies, and telecommunications companies.

(6) *Customer* means a person that has a covered account with a financial institution or creditor.

(7) *Financial institution* has the same meaning as in 15 U.S.C. 1681a(t).

(8) *Identity theft* has the same meaning as in 16 CFR 603.2(a).

(9) *Red Flag* means a pattern, practice, or specific activity that indicates the possible existence of identity theft.

(10) *Service provider* means a person that provides a service directly to the financial institution or creditor.

(c) *Periodic Identification of Covered Accounts.* Each financial institution or creditor must periodically determine whether it offers or maintains covered accounts. As a part of this determination, a financial institution or creditor must conduct a risk assessment to determine whether it offers or maintains covered accounts described in paragraph (b)(3)(ii) of this section, taking into consideration:

(1) The methods it provides to open its accounts;

(2) The methods it provides to access its accounts; and

(3) Its previous experiences with identity theft.

(d) *Establishment of an Identity Theft Prevention Program.* (1) *Program requirement.* Each financial institution or creditor that offers or maintains one or more covered accounts must develop and implement a written Identity Theft Prevention Program (Program) that is designed to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing covered account. The Program must be appropriate to the size and complexity of the financial institution or creditor and the nature and scope of its activities.

(2) *Elements of the Program.* The Program must include reasonable policies and procedures to:

(i) Identify relevant Red Flags for the covered accounts that the financial institution or creditor offers or maintains, and incorporate those Red Flags into its Program;

(ii) Detect Red Flags that have been incorporated into the Program of the financial institution or creditor;

(iii) Respond appropriately to any Red Flags that are detected pursuant to paragraph (d)(2)(ii) of this section to prevent and mitigate identity theft; and

(iv) Ensure the Program (including the Red Flags determined to be relevant) is updated periodically, to reflect changes in risks to customers and to the safety and soundness of the financial institution or creditor from identity theft.

(e) *Administration of the Program.* Each financial institution or creditor that is required to implement a Program must provide for the continued administration of the Program and must:

(1) Obtain approval of the initial written Program from either its board of directors or an appropriate committee of the board of directors;

(2) Involve the board of directors, an appropriate committee thereof, or a designated employee at the level of senior management in the oversight, development, implementation and administration of the Program;

(3) Train staff, as necessary, to effectively implement the Program; and

(4) Exercise appropriate and effective oversight of service provider arrangements.

(f) *Guidelines.* Each financial institution or creditor that is required to implement a Program must consider the guidelines in Appendix J of this part and include in its Program those guidelines that are appropriate.

§ 41.91 Duties of card issuers regarding changes of address.

(a) *Scope.* This section applies to an issuer of a debit or credit card (card issuer) that is a national bank, Federal branch or agency of a foreign bank, and any of their operating subsidiaries that are not functionally regulated within the meaning of section 5(c)(5) of the Bank Holding Company Act of 1956, as amended (12 U.S.C. 1844(c)(5)).

(b) *Definitions.* For purposes of this section:

(1) *Cardholder* means a consumer who has been issued a credit or debit card.

(2) *Clear and conspicuous* means reasonably understandable and designed to call attention to the nature and significance of the information presented.

(c) *Address validation requirements.* A card issuer must establish and

implement reasonable policies and procedures to assess the validity of a change of address if it receives notification of a change of address for a consumer's debit or credit card account and, within a short period of time afterwards (during at least the first 30 days after it receives such notification), the card issuer receives a request for an additional or replacement card for the same account. Under these circumstances, the card issuer may not issue an additional or replacement card, until, in accordance with its reasonable policies and procedures and for the purpose of assessing the validity of the change of address, the card issuer:

(1)(i) Notifies the cardholder of the request:

(A) At the cardholder's former address; or

(B) By any other means of communication that the card issuer and the cardholder have previously agreed to use; and

(ii) Provides to the cardholder a reasonable means of promptly reporting incorrect address changes; or

(2) Otherwise assesses the validity of the change of address in accordance with the policies and procedures the card issuer has established pursuant to § 41.90 of this part.

(d) *Alternative timing of address validation.* A card issuer may satisfy the requirements of paragraph (c) of this section if it validates an address pursuant to the methods in paragraph (c)(1) or (c)(2) of this section when it receives an address change notification, before it receives a request for an additional or replacement card.

(e) *Form of notice.* Any written or electronic notice that the card issuer provides under this paragraph must be clear and conspicuous and provided separately from its regular correspondence with the cardholder.

Appendices D-I [Reserved]

■ 7. Add and reserve appendices D through I to part 41.

■ 8. Add Appendix J to part 41 to read as follows:

Appendix J to Part 41—Interagency Guidelines on Identity Theft Detection, Prevention, and Mitigation

Section 41.90 of this part requires each financial institution and creditor that offers or maintains one or more covered accounts, as defined in § 41.90(b)(3) of this part, to develop and provide for the continued administration of a written Program to detect, prevent, and mitigate identity theft in connection with the opening of a covered account or any existing covered account. These guidelines are intended to assist financial institutions and creditors in the

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formulation and maintenance of a Program that satisfies the requirements of § 41.90 of this part.

I. The Program

In designing its Program, a financial institution or creditor may incorporate, as appropriate, its existing policies, procedures, and other arrangements that control reasonably foreseeable risks to customers or to the safety and soundness of the financial institution or creditor from identity theft.

II. Identifying Relevant Red Flags

(a) *Risk Factors.* A financial institution or creditor should consider the following factors in identifying relevant Red Flags for covered accounts, as appropriate:

(1) The types of covered accounts it offers or maintains;

(2) The methods it provides to open its covered accounts;

(3) The methods it provides to access its covered accounts; and

(4) Its previous experiences with identity theft.

(b) *Sources of Red Flags.* Financial institutions and creditors should incorporate relevant Red Flags from sources such as:

(1) Incidents of identity theft that the financial institution or creditor has experienced;

(2) Methods of identity theft that the financial institution or creditor has identified that reflect changes in identity theft risks; and

(3) Applicable supervisory guidance.

(c) *Categories of Red Flags.* The Program should include relevant Red Flags from the following categories, as appropriate. Examples of Red Flags from each of these categories are appended as Supplement A to this Appendix J.

(1) Alerts, notifications, or other warnings received from consumer reporting agencies or service providers, such as fraud detection services;

(2) The presentation of suspicious documents;

(3) The presentation of suspicious personal identifying information, such as a suspicious address change;

(4) The unusual use of, or other suspicious activity related to, a covered account; and

(5) Notice from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts held by the financial institution or creditor.

III. Detecting Red Flags

The Program's policies and procedures should address the detection of Red Flags in connection with the opening of covered accounts and existing covered accounts, such as by:

(a) Obtaining identifying information about, and verifying the identity of, a person opening a covered account, for example, using the policies and procedures regarding identification and verification set forth in the Customer Identification Program rules implementing 31 U.S.C. 5318(l) (31 CFR 103.121); and

(b) Authenticating customers, monitoring transactions, and verifying the validity of change of address requests, in the case of existing covered accounts.

IV. Preventing and Mitigating Identity Theft

The Program's policies and procedures should provide for appropriate responses to the Red Flags the financial institution or creditor has detected that are commensurate with the degree of risk posed. In determining an appropriate response, a financial institution or creditor should consider aggravating factors that may heighten the risk of identity theft, such as a data security incident that results in unauthorized access to a customer's account records held by the financial institution, creditor, or third party, or notice that a customer has provided information related to a covered account held by the financial institution or creditor to someone fraudulently claiming to represent the financial institution or creditor or to a fraudulent website. Appropriate responses may include the following:

(a) Monitoring a covered account for evidence of identity theft;

(b) Contacting the customer;

(c) Changing any passwords, security codes, or other security devices that permit access to a covered account;

(d) Reopening a covered account with a new account number;

(e) Not opening a new covered account;

(f) Closing an existing covered account;

(g) Not attempting to collect on a covered account or not selling a covered account to a debt collector;

(h) Notifying law enforcement; or

(i) Determining that no response is warranted under the particular circumstances.

V. Updating the Program

Financial institutions and creditors should update the Program (including the Red Flags determined to be relevant) periodically, to reflect changes in risks to customers or to the safety and soundness of the financial institution or creditor from identity theft, based on factors such as:

(a) The experiences of the financial institution or creditor with identity theft;

(b) Changes in methods of identity theft;

(c) Changes in methods to detect, prevent, and mitigate identity theft;

(d) Changes in the types of accounts that the financial institution or creditor offers or maintains; and

(e) Changes in the business arrangements of the financial institution or creditor, including mergers, acquisitions, alliances, joint ventures, and service provider arrangements.

VI. Methods for Administering the Program

(a) *Oversight of Program.* Oversight by the board of directors, an appropriate committee of the board, or a designated employee at the level of senior management should include:

(1) Assigning specific responsibility for the Program's implementation;

(2) Reviewing reports prepared by staff regarding compliance by the financial institution or creditor with § 41.90 of this part; and

(3) Approving material changes to the Program as necessary to address changing identity theft risks.

(b) *Reports.* (1) *In general.* Staff of the financial institution or creditor responsible for development, implementation, and

administration of its Program should report to the board of directors, an appropriate committee of the board, or a designated employee at the level of senior management, at least annually, on compliance by the financial institution or creditor with § 41.90 of this part.

(2) *Contents of report.* The report should address material matters related to the Program and evaluate issues such as: the effectiveness of the policies and procedures of the financial institution or creditor in addressing the risk of identity theft in connection with the opening of covered accounts and with respect to existing covered accounts; service provider arrangements; significant incidents involving identity theft and management's response; and recommendations for material changes to the Program.

(c) *Oversight of service provider arrangements.* Whenever a financial institution or creditor engages a service provider to perform an activity in connection with one or more covered accounts the financial institution or creditor should take steps to ensure that the activity of the service provider is conducted in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of identity theft. For example, a financial institution or creditor could require the service provider by contract to have policies and procedures to detect relevant Red Flags that may arise in the performance of the service provider's activities, and either report the Red Flags to the financial institution or creditor, or to take appropriate steps to prevent or mitigate identity theft.

VII. Other Applicable Legal Requirements

Financial institutions and creditors should be mindful of other related legal requirements that may be applicable, such as:

(a) For financial institutions and creditors that are subject to 31 U.S.C. 5318(g), filing a Suspicious Activity Report in accordance with applicable law and regulation;

(b) Implementing any requirements under 15 U.S.C. 1681c-1(h) regarding the circumstances under which credit may be extended when the financial institution or creditor detects a fraud or active duty alert;

(c) Implementing any requirements for furnishers of information to consumer reporting agencies under 15 U.S.C. 1681s-2, for example, to correct or update inaccurate or incomplete information, and to not report information that the furnisher has reasonable cause to believe is inaccurate; and

(d) Complying with the prohibitions in 15 U.S.C. 1681m on the sale, transfer, and placement for collection of certain debts resulting from identity theft.

Supplement A to Appendix J

In addition to incorporating Red Flags from the sources recommended in section II.b. of the Guidelines in Appendix J of this part, each financial institution or creditor may consider incorporating into its Program, whether singly or in combination, Red Flags from the following illustrative examples in connection with covered accounts:

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Alerts, Notifications or Warnings from a Consumer Reporting Agency

1. A fraud or active duty alert is included with a consumer report.
2. A consumer reporting agency provides a notice of credit freeze in response to a request for a consumer report.
3. A consumer reporting agency provides a notice of address discrepancy, as defined in § 41.82(b) of this part.
4. A consumer report indicates a pattern of activity that is inconsistent with the history and usual pattern of activity of an applicant or customer, such as:
 - a. A recent and significant increase in the volume of inquiries;
 - b. An unusual number of recently established credit relationships;
 - c. A material change in the use of credit, especially with respect to recently established credit relationships; or
 - d. An account that was closed for cause or identified for abuse of account privileges by a financial institution or creditor.

Suspicious Documents

5. Documents provided for identification appear to have been altered or forged.
6. The photograph or physical description on the identification is not consistent with the appearance of the applicant or customer presenting the identification.
7. Other information on the identification is not consistent with information provided by the person opening a new covered account or customer presenting the identification.
8. Other information on the identification is not consistent with readily accessible information that is on file with the financial institution or creditor, such as a signature card or a recent check.
9. An application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.

Suspicious Personal Identifying Information

10. Personal identifying information provided is inconsistent when compared against external information sources used by the financial institution or creditor. For example:
 - a. The address does not match any address in the consumer report; or
 - b. The Social Security Number (SSN) has not been issued, or is listed on the Social Security Administration's Death Master File.
11. Personal identifying information provided by the customer is not consistent with other personal identifying information provided by the customer. For example, there is a lack of correlation between the SSN range and date of birth.
12. Personal identifying information provided is associated with known fraudulent activity as indicated by internal or third-party sources used by the financial institution or creditor. For example:
 - a. The address on an application is the same as the address provided on a fraudulent application; or
 - b. The phone number on an application is the same as the number provided on a fraudulent application.
13. Personal identifying information provided is of a type commonly associated with fraudulent activity as indicated by

internal or third-party sources used by the financial institution or creditor. For example:

- a. The address on an application is fictitious, a mail drop, or a prison; or
 - b. The phone number is invalid, or is associated with a pager or answering service.
14. The SSN provided is the same as that submitted by other persons opening an account or other customers.
 15. The address or telephone number provided is the same as or similar to the account number or telephone number submitted by an unusually large number of other persons opening accounts or other customers.
 16. The person opening the covered account or the customer fails to provide all required personal identifying information on an application or in response to notification that the application is incomplete.
 17. Personal identifying information provided is not consistent with personal identifying information that is on file with the financial institution or creditor.
 18. For financial institutions and creditors that use challenge questions, the person opening the covered account or the customer cannot provide authenticating information beyond that which generally would be available from a wallet or consumer report.
- Unusual Use of, or Suspicious Activity Related to, the Covered Account
19. Shortly following the notice of a change of address for a covered account, the institution or creditor receives a request for a new, additional, or replacement card or a cell phone, or for the addition of authorized users on the account.
 20. A new revolving credit account is used in a manner commonly associated with known patterns of fraud patterns. For example:
 - a. The majority of available credit is used for cash advances or merchandise that is easily convertible to cash (e.g., electronics equipment or jewelry); or
 - b. The customer fails to make the first payment or makes an initial payment but no subsequent payments.
 21. A covered account is used in a manner that is not consistent with established patterns of activity on the account. There is, for example:
 - a. Nonpayment when there is no history of late or missed payments;
 - b. A material increase in the use of available credit;
 - c. A material change in purchasing or spending patterns;
 - d. A material change in electronic fund transfer patterns in connection with a deposit account; or
 - e. A material change in telephone call patterns in connection with a cellular phone account.
 22. A covered account that has been inactive for a reasonably lengthy period of time is used (taking into consideration the type of account, the expected pattern of usage and other relevant factors).
 23. Mail sent to the customer is returned repeatedly as undeliverable although transactions continue to be conducted in connection with the customer's covered account.

24. The financial institution or creditor is notified that the customer is not receiving paper account statements.

25. The financial institution or creditor is notified of unauthorized charges or transactions in connection with a customer's covered account.

Notice From Customers, Victims of Identity Theft, Law Enforcement Authorities, or Other Persons Regarding Possible Identity Theft in Connection With Covered Accounts Held by the Financial Institution or Creditor

26. The financial institution or creditor is notified by a customer, a victim of identity theft, a law enforcement authority, or any other person that it has opened a fraudulent account for a person engaged in identity theft.

Board of Governors of the Federal Reserve System

12 CFR Chapter II.

Authority and Issuance

■ For the reasons set forth in the joint preamble, part 222 of title 12, chapter II, of the Code of Federal Regulations is amended as follows:

PART 222—FAIR CREDIT REPORTING (REGULATION V)

■ 1. The authority citation for part 222 continues to read as follows:

Authority: 15 U.S.C. 1681a, 1681b, 1681c, 1681m, 1681s, 1681s-2, 1681s-3, 1681t, and 1681w; Secs. 3 and 214, Pub. L. 108-159, 117 Stat. 1952.

Subpart A—General Provisions

■ 2. Section 222.3 is amended by revising the introductory text to read as follows:

§ 222.3 Definitions.

For purposes of this part, unless explicitly stated otherwise:

* * * * *

■ 3. The heading for Subpart I is revised to read as follows:

Subpart I—Duties of Users of Consumer Reports Regarding Address Discrepancies and Records Disposal

■ 4. A new § 222.82 is added to read as follows:

§ 222.82 Duties of users regarding address discrepancies.

(a) *Scope.* This section applies to a user of consumer reports (user) that receives a notice of address discrepancy from a consumer reporting agency, and that is a member bank of the Federal Reserve System (other than a national bank) and its respective operating subsidiaries, a branch or agency of a foreign bank (other than a Federal branch, Federal agency, or insured State branch of a foreign bank), commercial

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
Workpaper: VARIOUS

Summary for Category: D. Meter Reading

	In 2009\$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	29,071	28,753	28,839	30,185
Non-Labor	2,586	2,643	2,652	2,732
NSE	0	0	0	0
Total	31,657	31,396	31,491	32,917
FTE	724.3	735.5	738.1	761.2

Workpapers belonging to this Category:

2FO004.000 Field Ops-MRdg-Dist Opers

Labor	23,820	23,705	23,791	24,067
Non-Labor	1,396	1,356	1,365	1,387
NSE	0	0	0	0
Total	25,216	25,061	25,156	25,454
FTE	647.7	659.7	662.3	670.2

2FO005.000 Field Ops-MRdg-Clerical Opers

Labor	1,019	989	989	1,002
Non-Labor	19	21	21	21
NSE	0	0	0	0
Total	1,038	1,010	1,010	1,023
FTE	16.6	16.5	16.5	16.6

2FO006.000 Field Ops-MRdg-Supv/Trng/Prog

Labor	2,820	2,779	2,779	3,210
Non-Labor	410	398	398	421
NSE	0	0	0	0
Total	3,230	3,177	3,177	3,631
FTE	43.0	43.7	43.7	49.8

2FO007.000 Field Ops-MRdg-Staff Support

Labor	1,412	1,280	1,280	1,906
Non-Labor	761	868	868	903
NSE	0	0	0	0
Total	2,173	2,148	2,148	2,809
FTE	17.0	15.6	15.6	24.6

Beginning of Workpaper
2FO004.000 - Field Ops-MRdg-Dist Opers

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

Activity Description:

Meter Reading District Operations covers the cost of recording customer gas consumption to accurately bill customers for the consumption of gas. Meter reading activities are performed at meter reading districts throughout the SCG service territory. Labor expenses include those for both full-time Meter Reading Technicians and Meter Readers and part-time Meter Readers. Non-labor expenses associated to the activities of these employees are also represented in this group.

Forecast Methodology:

Labor - 5-YR Average

The five-year average methodology captures the high and low expenditures seen under a variety of conditions. It provides the best representative base of labor over the years for all district cost centers before minimal adjustments were made. Significant changes over the last five years are smoothed with this method.

Non-Labor - 5-YR Average

The five-year average methodology captures the high and low expenditures seen under a variety of conditions. It provides the best representative base of non-labor over the years for all district cost centers before minimal adjustments were made.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

Years	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Labor	23,518	24,497	24,133	23,309	23,820	23,705	23,791	24,067	
Non-Labor	1,090	1,327	1,497	1,451	1,396	1,356	1,365	1,387	
NSE	0	0	0	0	0	0	0	0	
Total	24,608	25,824	25,630	24,760	25,216	25,061	25,156	25,454	
FTE	637.7	706.3	707.3	668.3	647.7	659.7	662.3	670.2	

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	23,855	23,855	23,855	-150	-64	212	23,705	23,791	24,067
Non-Labor	5-YR Average	1,352	1,352	1,352	4	13	35	1,356	1,365	1,387
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		25,207	25,207	25,207	-146	-51	247	25,061	25,156	25,454
FTE	5-YR Average	673.5	673.5	673.5	-13.8	-11.2	-3.3	659.7	662.3	670.2

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	62	0	0	62	0.0	1-Sided Adj

2010 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2010	0	7	0	7	0.0	1-Sided Adj
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2010 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 1.9 FTEs. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2010	0	0	0	0	1.9	1-Sided Adj
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2010 - Approximately 4 part time meter readers or 1.9 FTEs associated to labor expense for additional meter route time due to meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2010	-531	0	0	-531	0.0	1-Sided Adj
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Labor reduction resulting from RAMR drive-by automated meter reading at four districts. Reduction of 27 Part-time meter readers from the workforce (15.65 FTEs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.

2010	0	-33	0	-33	0.0	1-Sided Adj
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Associated non-labor reduction resulting from RAMR drive-by automated meter reading at four districts (includes savings of uniforms, tools and materials, and reimbursable mileage). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations - Forecast" for detailed analysis.

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 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRDg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRDg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2010	0	0	0	0	-15.7	1-Sided Adj

Reduction of 27 Part-time meter readers (or 15.65 FTES) due to RAMR drive-by automated meter reading at four districts. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.

2010	319	0	0	319	0.0	1-Sided Adj
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Part - time Meter Reader Wage escalation adjustment to adjust Forecast to current Union Agreement Wage Increase of 3.5% for PT Labor. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations" for detailed analysis.

2010	0	30	0	30	0.0	1-Sided Adj
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Non-labor costs for safety communications to customers with multiple and/or aggressive dog(s) through technology mediums such as Outbound Dialing, auto-generated emails, etc. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2010 Total	-150	4	0	-146	-13.8	
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2011	86	0	0	86	0.0	1-Sided Adj
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2011 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2011	0	9	0	9	0.0	1-Sided Adj
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2011 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 2.6 FTEs. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2011	0	0	0	0	2.6	1-Sided Adj
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2011 Approximately 5 part time meter readers or 2.6 FTEs associated to labor expense for additional meter route time due to meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2011	-531	0	0	-531	0.0	1-Sided Adj
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
Labor reduction resulting from RAMR drive-by automated meter reading at four districts. Reduction of 27 Part-time meter readers from the workforce (15.65 FTEs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.						
2011	0	-33	0	-33	0.0	1-Sided Adj
Associated non-labor reduction resulting from RAMR drive-by automated meter reading at four districts (includes savings of uniforms, tools and materials, and reimbursable mileage). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.						
2011	0	0	0	0	-15.7	1-Sided Adj
Reduction of 27 Part-time meter readers (or 15.65 FTES) due to RAMR drive-by automated meter reading at four districts. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.						
2011	62	0	0	62	0.0	1-Sided Adj
2010 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2011	319	0	0	319	0.0	1-Sided Adj
Part - time Meter Reader Wage escalation adjustment to adjust Forecast to current Union Agreement Wage Increase of 3.5% for PT Labor. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf,Part-time Meter Reader Wage Increase" for detailed analysis.						
2011	0	7	0	7	0.0	1-Sided Adj
2010 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 1.9 FTEs. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2011	0	0	0	0	1.9	1-Sided Adj
2010 - Approximately 4 part time meter readers or 1.9 FTEs associated to labor expense for additional meter route time due to meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2011	0	30	0	30	0.0	1-Sided Adj
Non-labor costs for safety communications to customers with multiple and/or aggressive dog(s) through technology mediums such as Outbound Dialing, auto-generated emails, etc. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011 Total	-64	13	0	-51	-11.2	
2012	108	0	0	108	0.0	1-Sided Adj
<p>2012 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.</p>						
2012	0	12	0	12	0.0	1-Sided Adj
<p>2012 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 3.3 FTEs of labor added for meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.</p>						
2012	0	0	0	0	3.3	1-Sided Adj
<p>2012 Approximately 7 part time meter readers or 3.3 FTEs associated to labor expense for additional meter route time due to gas meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.</p>						
2012	-531	0	0	-531	0.0	1-Sided Adj
<p>Labor reduction resulting from RAMR drive-by automated meter reading at four districts. Reduction of 27 Part-time meter readers from the workforce (15.65 FTEs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.</p>						
2012	0	-33	0	-33	0.0	1-Sided Adj
<p>Associated non-labor reduction resulting from RAMR drive-by automated meter reading at four districts (includes savings of uniforms, tools and materials, and reimbursable mileage). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.</p>						
2012	0	0	0	0	-15.7	1-Sided Adj
<p>Reduction of 27 Part-time meter readers (or 15.65 FTES) due to RAMR drive-by automated meter reading at four districts. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, RAMR Calculations" for detailed analysis.</p>						
2012	168	0	0	168	0.0	1-Sided Adj

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 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
Labor associated to the training of Meter Reading district non-managment on a new Handheld unit & system. (6 hour class on Saturday, Overtime pay for Fulltime and Straighttime pay for Part-time readers). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	10	0	10	0.0	1-Sided Adj
Non-labor employee expenses associated to Saturday training classes on the new handheld unit & system for district Meter Readers, MR Technicians and others at training sessions. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	0	0	0	4.6	1-Sided Adj
FTEs associated to training on a new handheld unit & system for district non-management in Meter Reading. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	62	0	0	62	0.0	1-Sided Adj
2010 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	86	0	0	86	0.0	1-Sided Adj
2011 Increase in annual meter route time paid due to gas meter growth - each additional meter adds time to the meter route based on a Work Unit Value (WUV) or average read time per meter. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	319	0	0	319	0.0	1-Sided Adj
Part - time Meter Reader Wage escalation adjustment to adjust Forecast to current Union Agreement Wage Increase of 3.5% for PT Labor. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations" for detailed analysis.						
2012	0	7	0	7	0.0	1-Sided Adj
2010 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 1.9 FTEs for meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	0	0	0	1.9	1-Sided Adj
2010 - Approximately 4 part time meter readers or 1.9 FTEs associated to labor expense for additional meter route time due to meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
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 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRdg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	0	9	0	9	0.0	1-Sided Adj

2011 Tools, uniforms and reimbursable mileage for use of personal vehicle for meter reading for approximately 2.6 FTEs for meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2012	0	0	0	0	2.6	1-Sided Adj
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2011 Approximately 5 part time meter readers or 2.6 FTEs associated to labor expense for additional meter route time due to meter growth. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2012	0	30	0	30	0.0	1-Sided Adj
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Non-labor costs for safety communications to customers with multiple and/or aggressive dog(s) through technology mediums such as Outbound Dialing, auto-generated emails, etc. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2012 Total	212	35	0	247	-3.3	
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Southern California Gas Company
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Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
Category-Sub: 1. Field Ops-MRdg-Dist Opers
Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	17,948	19,100	19,377	18,915	19,725
Non-Labor	971	1,225	1,427	1,460	1,368
NSE	0	0	0	0	0
Total	18,919	20,325	20,803	20,374	21,093
FTE	540.2	596.9	597.7	553.5	531.5
Adjustments (Nominal \$) **					
Labor	0	0	12	146	450
Non-Labor	0	0	2	-5	28
NSE	0	0	0	0	0
Total	0	0	14	141	478
FTE	0.0	0.0	0.6	4.5	13.2
Recorded-Adjusted (Nominal \$)					
Labor	17,948	19,100	19,389	19,061	20,175
Non-Labor	971	1,225	1,429	1,455	1,396
NSE	0	0	0	0	0
Total	18,919	20,325	20,817	20,515	21,571
FTE	540.2	596.9	598.3	558.0	544.7
Vacation & Sick (Nominal \$)					
Labor	3,060	3,413	3,383	3,673	3,646
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	3,060	3,413	3,383	3,673	3,646
FTE	97.5	109.4	109.0	110.3	103.0
Escalation to 2009\$					
Labor	2,509	1,984	1,361	576	0
Non-Labor	119	102	69	-4	0
NSE	0	0	0	0	0
Total	2,628	2,086	1,430	572	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	23,518	24,497	24,133	23,309	23,820
Non-Labor	1,090	1,327	1,497	1,451	1,396
NSE	0	0	0	0	0
Total	24,608	25,825	25,631	24,760	25,216
FTE	637.7	706.3	707.3	668.3	647.7

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
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Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
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Workpaper: 2FO004.000 - Field Ops-MRdg-Dist Opers

Summary of Adjustments to Recorded:

In Nominal \$ (000)						
Year	2005	2006	2007	2008	2009	
Labor	0	0	12	146	450	
Non-Labor	0	0	2	-5	28	
NSE	0	0	0	0	0	
Total	0	0	14	141	478	
FTE	0.0	0.0	0.6	4.5	13.2	

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007	-11	0	0	0.0	CCTR Transf	To 2200-2024.000	ATPERSIN20090 904111829703
Management labor incorrectly charged to a non-management district cost center 2200-0397. Corrected to Area Manager Cost center 2200- 2024.							
2007	0	0	0	0.8	1-Sided Adj	N/A	TP1NBW2010031 2155845977
2007 RAMR FTEs associated to labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)							
2007	24	0	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5154901660
2007 RAMR labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)							
2007	0	2	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5154944363
2007 RAMR non-labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)							
2007	0	0	0	-0.2	CCTR Transf	To 2200-2024.000	TP1NBW2010031 7110021227
FTEs associated to management labor incorrectly charged to a non-management district cost center 2200- 0397. Corrected to Area Manager Cost center 2200- 2024.							

Southern California Gas Company
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 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 1. Field Ops-MRDg-Dist Opers
 Workpaper: 2FO004.000 - Field Ops-MRDg-Dist Opers

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2007 Total	12	2	0	0.6			
2008	146	0	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5155417850
	2008 RAMR labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2008	0	10	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5155452883
	2008 RAMR non-labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2008	0	0	0	4.5	1-Sided Adj	N/A	TP1NBW2010031 5155607743
	2008 RAMR FTEs associated to labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2008	0	-15	0	0.0	CCTR Transf	To 2200-0358.000	TP1NBW2010042 1210040953
	Mileage for managementt employees incorrectly recorded in District cost centers 2200-0365 (\$6425) and 2200-2237 (\$8260). Transferred to Supervisor cost center 2200-0358						
2008 Total	146	-5	0	4.5			
2009	450	0	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5155850420
	2009 RAMR labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2009	0	28	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 5155929860
	2009 RAMR non-labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2009	0	0	0	13.2	1-Sided Adj	N/A	TP1NBW2010031 5160009453
	2009 RAMR FTEs associated to labor savings - added back into historical data in order to derive a 5 year average not impacted by RAMR (RAMR savings to be shown in Forecast)						
2009 Total	450	28	0	13.2			

Supplemental Workpapers for Workpaper 2FO004.000

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT

Workgroup 2FO004.000 Meter Reading District Operations
Detailed Workpaper Calculations - NSS 2FO004.000

Year		FTEs	Total \$	Lbr \$	Nib \$	
	<u>Meter Growth - Incremental increase of Gas meters for 2010</u> 2010	1.9	\$69,135	\$62,435	\$6,700	
	((50% of previous years growth x 12 reads/year + 50% of forecast year growth x 6 reads per year) x average time per meter read (WUV) (.79 min) x Part-time blender hourly ST wage (\$15.80) x 2009 V&S Labor Factor) x Annual hours per FTE)					
2010	((12315 x 12 x .79/60 x 15.80) + (17735 x 6 x .79/60 x 15.80) x 1.1807) x 2088 hrs	1.89	\$69,135.0	\$62,435	\$6,700	
	NLB per year: \$3,540 per Reader FTE x No. FTEs per year					
	<u>Meter Growth - Incremental increase of Gas meters for 2011</u> 2011	4.5	\$164,119	\$148,183	\$15,936	
	((50% of previous years growth x 12 reads/year + 50% of forecast year growth x 6 reads per year) x average time per meter read (WUV) (.79 min) x Part-time blender hourly ST wage (\$15.80) x 2009 V&S Labor Factor) x Annual hours per FTE)					
2010	((12315 x 12 x .79/60 x 15.80) + (17735 x 6 x .79/60 x 15.80) x 1.1807) x 2088 hrs	1.89	\$69,135.0	\$62,435	\$6,700	
2011	((17735 x 12 x .79/60 x 15.80) + (22713 x 6 x .79/60 x 15.80) x 1.1807) x 2080 hrs	2.61	\$94,983.6	\$85,747	\$9,236	
	NLB per year: \$3,540 per Reader FTE x No. FTEs per year					
	<u>Meter Growth - Incremental increase of Gas meters for 2012</u> TY 2012	7.8	\$283,320	\$255,833	\$27,487	
	((50% of previous years growth x 12 reads/year + 50% of forecast year growth x 6 reads per year) x average time per meter read (WUV) (.79 min) x Part-time blender hourly ST wage (\$15.80) x 2009 V&S Labor Factor) x Annual hours per FTE)					
2010	((12315 x 12 x .79/60 x 15.80) + (17735 x 6 x .79/60 x 15.80) x 1.1807) x 2088 hrs	1.89	\$69,135.0	\$62,435	\$6,700	
2011	((17735 x 12 x .79/60 x 15.80) + (22713 x 6 x .79/60 x 15.80) x 1.1807) x 2080 hrs	2.61	\$94,983.6	\$85,747	\$9,236	
2012	((22713 x 12 x .79/60 x 15.80) + (27619 x 6 x .79/60 x 15.80) x 1.1807) x 2088 hrs	3.26	\$119,201	\$107,650	\$11,551	
	NLB per year: \$3,540 per Reader FTE x No. FTEs per year					
	<u>RAMR Reduction - Drive-by automated meter reading</u> TY 2012	-15.7	-\$564,027	-\$530,881	-\$33,147	
	See D. RAMR Calculations - Forecast Calcs tab					
2010-12	Labor reduction of 27 PT Meter Readers (-32678 hours)	-15.65	-\$564,027	-\$530,881	-\$33,147	
	NLB per year: -\$2,118 per Reader FTE x No. FTEs per year					
	<u>Part-time Meter Reader wage increase adjustment</u> TY 2012	0.0	\$319,010	\$319,010	\$0	
	See B. SCG PT Meter Reader wage increase - NSS 2FO 004					
2010-12	1.9% increase to PT wage to bring it up to 3.5% in the CBA	0.00	\$319,010	\$319,010	\$0.0	
	<u>Dog Safety Communications via Technology</u> TY 2012	0.0	\$30,000	\$0	\$30,000	
	Use of Outbound Dialing or other technology to provide dog safety communications to customers prior to read day					
2010-12	Estimated cost of \$2500/month for CIS interface/extract and volume costs	0.00	\$30,000	\$0.0	\$30,000	
	<u>MR System & Handheld Training on new or upgraded system</u> TY 2012	4.6	\$177,269	\$167,689	\$10,390	
	Training of MR Techs, MR-Rs and PT Rdrs - Saturdays (OT for FT and ST for PT); learnig curve (non-productive time) in first week readers are out on their meter routes using the new units. Non-labor covers non-management and others.					
2012	Labor: (6 hrs) x (avg. blended hrly wage of \$20.36/hr ST x 1.5) x 100 MR-Rs	0.29	\$19,324.0	\$18,324	\$1,000	
	NLB: (100 MR-Rs x \$10/person lunch)					
	FTE: (6 hrs x 100 MR-Rs) / 2088 hrs/year					
	Labor: (6 hrs) x (avg. blended hrly wage of \$29.92/hr ST x 1.5) x 46 MR Techs	0.13	\$12,846.9	\$12,387	\$460	
	NLB: (46 MR Techs x \$10/person lunch)					
	FTE: (6 hrs x 46 MR Techs) / 2088 hrs/year					
	Labor: (6 hrs x V&S factor of 1.1891) x (avg. blended hrly wage of \$15.80/hr ST) x 812 Fld Instrs	2.77	\$99,654.1	\$91,534	\$8,120	
	NLB: (812 PT Meter Readers x \$10/person lunch)					
	FTE: (6 hrs x 8 Fld Instructors) / 2088 hrs/year					
	Labor: (3 hrs) x (avg. blended hrly wage of \$15.80/hr ST) x 812 PT MRdrs	1.39	\$45,443.7	\$45,444	\$0	
	NLB: N/A - Learning curve in the field					
	FTE: (3 hrs x 812 PT Meter Readers) / 2088 hrs/year					
	Non-labor: Others	0	\$810.0	\$0.0	\$810.0	
2012	GRC Total For 2FO 004.00 (dollars in '000s)	TY 2012	(3.3)	\$246	\$212	\$35

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2F0004.000 Meter Reading District Operations
 RAMR Calculations - Historical Savings 2007-2009 - Part 1 of 2

1 Part Time Employee Reductions by Location and Month/Year						
Year	Optimal # of Employees	Location	PT Employee Reduction	Months of Savings in 2007	Months of Savings in 2008	Months of Savings in 2009
7/18/2007	Reduced from 36 to 34	Hollywood	2	5	12	12
7/27/2007	Reduced from 32 to 31	Santa Monica	1	5	12	12
9/20/2007	Reduced from 34 to 33	Hollywood	1	3	12	12
11/8/2007	Reduced from 31 to 30	Santa Monica	1	1.5	12	12
8/14/2008	Reduced from 30 to 28	Santa Monica	2		4	12
9/11/2008	Reduced from 39 to 32	Saticoy	7		3	12
9/15/2008	Reduced from 33 to 28	Hollywood	5		3	12
9/18/2008	Reduced from 22 to 20	Canoga	2		3	12
1/12/2009	Reduced from 20 to 18	Canoga	2			11
1/12/2009	Reduced from 32 to 28	Saticoy	4			11

2 Average Route Time by base	
Location	Average Route Time
Canoga	4.21
Hollywood	4.14
Santa Monica	4.03
Saticoy	4.06
Average	4.11

Meeting time averages 1 hour per employee each month.

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2FO004.000 Meter Reading District Operations
RAMR Calculations - Historical Savings 2007-2009 - Part 2 of 2

3 Part-Time Labor & Non-Labor Calculations		Emps Reduced by RAMR	Avg Daily Route Time (hrs)	Months Meeting Time (Hrs)	Routes per month	3a) Hours reduced	3b) Full-Time Equivalent	Annual Non-Labor \$\$ / FTE	Blended Wage Rate	3c) Monthly (Meeting \$)	3d) Monthly (Route \$)	Months of Savings	3e) Annual Labor	3f) Annual Non-Labor
Year														
July 2007	3	4.09	1	21	1286.8	0.62	\$2,549	\$13.87	\$41.61	\$3,569.51	5	\$18,055.62	\$1,570.63	
Sept. 2007	1	4.14	1	21	260.8	0.12	\$2,549	\$14.13	\$14.13	\$1,228.46	3	\$3,727.78	\$318.36	
Nov. 2007	1	4.03	1	21	126.9	0.06	\$2,549	\$14.28	\$14.28	\$1,208.52	1.5	\$1,834.19	\$154.95	
2007 Total	5				1674.5	0.80							\$23,617.59	\$2,043.93
Prior year	5	4.09	1	21	5147.1	2.46	\$2,205	\$15.11	\$75.55	\$6,481.06	12	\$78,679.28	\$5,415.40	
Aug. 2008	2	4.09	1	21	686.28	0.33	\$2,205	\$14.65	\$29.50	\$2,313.50	4	\$10,171.20	\$722.05	
Sept. 2008	14	4.14	1	21	3648.54	1.74	\$2,205	\$15.43	\$216.02	\$18,765.66	3	\$56,945.03	\$3,838.72	
2008 Total	21				9481.92	4.52							\$145,795.52	\$9,976.17
Prior year	21	4.11	1	21	21750.12	10.42	\$2,118	\$16.07	\$337.47	\$29,127.04	12	\$353,574.07	\$22,037.63	
Jan. 2009	6	4.14	1	21	5731.11	2.74	\$2,118	\$16.57	\$99.42	\$8,633.14	11	\$96,058.11	\$5,812.14	
2009 Total	27				27481.23	13.16							\$449,632.18	\$27,869.76

4 Non-Labor Calculations

	Miles	Rate	Per-FTE
2009 Avg. reimbursable mileage/FTE	3210	\$ 0.550	\$1,766
Uniforms & lost/damage @ 15%	0		\$137
Safety tools/supplies	3942		\$140
Misc. employee expense	5173		\$75
Total	3500		\$2,118

2008 Avg. reimbursable mileage/FTE	3680	\$ 0.505	\$1,858
Uniforms & lost/damage @ 15%	3134		\$137
Safety tools/supplies	2969		\$135
Misc. employee expense	4480		\$75
Total	4483		\$2,205
2007 Avg. reimbursable mileage/FTE	4560	\$ 0.485	\$2,212
Uniforms & lost/damage @ 15%	6096		\$137
Safety tools/supplies	2256		\$125
Misc. employee expense			\$75
Total			\$2,549

- Notes/Calculations:
- Part-Time employee reductions by location for the years 2007-2009. Identifies the amount of months each year the employees were reduced at each base.
 - Average daily route time for each base.
 - Part-Time labor savings calculations:
 - Hours Reduced (Employees Reduced x Avg. Daily Route Time x Routes per Month)
 - Full-time Equivalent (Hours Reduced / FTE Hours for each year)
 - Monthly Meeting Dollars (Employees Reduced x Monthly Meeting Time x Blended Wage Rate)
 - Monthly Route Dollars (Employees Reduced x Avg. Daily Route Time x Routes per Month x Blended Wage Rate)
 - Annual Labor Savings (Monthly Route Dollars + Monthly Meeting Dollars x Months of Savings)
 - Annual Non-Labor Savings (Annual Non-Labor Dollars per FTE x Full-Time Equivalent)
 - Non-Labor expenses per FTE

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2FO004.000 Meter Reading District Operations
 RAMR Calculations - Forecast Reductions 2010-2012

Year	Emp. Reduced by RAMR	Avg Daily Route Time (Hrs)	Monthly Meeting Time (Hrs)	Routes per month	1a) Hours reduced	1b) Full-Time Equivalents	Annual Non Labor \$\$ / FTE	Blended Wage Rate	1c) Monthly (Meeting \$)	1d) Monthly (Route \$)	Months of Savings	1e) Annual Labor	1f) Annual Non-Labor
Prior Years	21	4.11	1	21	21750.12	10.42	\$2,118	\$16.07	\$337.47	\$29,127.04	12	\$553,574.07	\$22,057.63
Jan. 2009	6	4.14	1	21	5731.11	2.74	\$2,118	\$16.57	\$99.42	\$8,633.14	11	\$96,058.11	\$5,812.14
2009 Total	27				27481.23	13.16						\$449,632.18	\$27,869.76

2 Non-labor: 2009 Avg. reimbursable mileage/FTE 3210 miles rate \$ 0.55
 Uniforms & lost/damage @ 15% \$137
 Safety tools/supplies \$140
 Misc. employee expense \$75
Total \$2,118

3 V&S Factors as of 02/03/2010

Co. Code	Fiscal Year	Factor	FTE Factor
2200	2005	0.1705	0.1804
2200	2006	0.1787	0.1852
2200	2007	0.1745	0.1821
2200	2008	0.1927	0.1977
2200	2009	0.1807	0.1891

2010 - 2012 Forecasts	Without V&S	V&S	With V&S
a Labor	-\$449,632.18	-\$81,248.54	-\$530,881
b Non labor	-\$27,869.76	-	-\$33,140
c FTE	-13.16	-2.49	(15.65)
d Headcount	-27	-5	-32.00

4 Part-Time labor savings calculations:

- a) Hours Reduced (Employees Reduced 2009 x Avg. Daily Route Time x Routes per Month)
- b) Full-time Employee Equivalent (Hours Reduced / FTE Hours for each year)
- c) Monthly Meeting Dollars (Employees Reduced x Monthly Meeting Time x Blended Wage)
- d) Monthly Route Dollars (Employees Reduced x Avg. Daily Route Time x Routes per Month)
- e) Annual Labor Savings (Monthly Route Dollars + Monthly Meeting Dollars x Months of Savings)
- f) Annual Non-Labor Savings (Annual Non-Labor Dollars per FTE x Full-Time Equivalent)
- 2 Non-Labor expenses per FTE
- 3 V&S Factors from GRID
- 4 Forecast Adjustments
 - a) Labor (RAMR labor savings from 2009 plus RAMR labor savings from 2009 X GRID Lab)
 - b) Non-Labor (RAMR non-labor savings from 2009)
 - c) FTE (RAMR 2009 FTE plus RAMR 2009 FTE X GRID FTE V&S factor)
 - d) Headcount (Employees Reduced 2009 + Reduction for V&S Amount)

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2FO004.000 Meter Reading District Operations
Part-time Meter Reader Wage Increase Calculations

	Historical					Forecast			
	2005	2006	2007	2008	2009	5 Yr Avg	2010	2011	2012
Percentage Impact									
a PT wage increase %	1.1%	1.0%	1.0%	1.6%	3.5%	1.6%			
b Current 5 yr avg forecast							1.6%	1.6%	1.6%
c Adjustment to bring up % to 3.5%							1.9%	1.9%	1.9%
c Adjusted 5 yr avg forecast percentage							3.5%	3.5%	3.5%

2008/2009 Agreement - 3.5% for all PT

Notes/Calculations:

- a Blended PT wage increase percentage for PT-1 and PT-3 meter readers in the stated year. in late 2008, the new Agreement increased all Part-time wages to 3.5% wage increase
- b 5 year average percentage of years 2005-2009
- c Adjustment percentage to bring 5-year average percentage up to 3.5% (3.5% - 1.6% = 1.9%) [line 4 minus line 3]
- d Desired adjusted 5-year average percentage per 2008/2009 Company/Unions Agreement

	Historical					Forecast			
	2005	2006	2007	2008	2009	5 Yr Avg	2010	2011	2012
Dollars impact									
1 PT Adjusted Historical Labor (Nominal \$)	\$12,537,746	\$13,641,344	\$14,324,299	\$13,964,684	\$14,409,580	\$13,775,530			
2 PT Adjusted Historical Labor (Constant 2009 \$)	\$14,035,314	\$14,843,682	\$15,180,478	\$14,318,347	\$14,409,580	\$14,557,480			
3 Percentage adjustment from above							1.9%	1.9%	1.9%
4 5 yr avg forecast (constant 2009 \$)							\$14,557,480	\$14,557,480	\$14,557,480
5 Adjustment % (see above) applied to 5 yr avg							\$270,187	\$270,187	\$270,187
6 Adjustment Amt with V&S							\$319,010	\$319,010	\$319,010

Notes/Calculations:

- 1 Part-time adjusted historical labor (nominal \$) obtained from GRID for stated year (all cost elements for Part-time labor) plus major RAMR adjustments
- 2 Part-time adjusted historical labor in line 1 escalated to constant 2009 dollars [line 1 x appropriate escalation factor for labor]
- 3 Percentage adjustment calculated in "Percentage impact - line 3" needed to bring PT wage increases to 3.5%
- 4 5-year average forecast as calculated in line 2 (in constant 2009 dollars)
- 5 Percentage adjustment applied to 5-year average forecast [line 3 x line 4] (1.9% x \$14,583,923)
- 6 Adjustment calculated in line 5 with V&S added [line 5 x appropriate 2009 V&S factor]

Escalation factors for 2200

	2005	2006	2007	2008	2009	Non-labor	Y&S factors	Lbr Factor	FTE factor
2200 G	GAS		0.8933	0.8933	0.8907	2005	1.1705	0.1804	
2200 G	GAS		0.919	0.919	0.9232	2006	1.1787	0.1832	
2200 G	GAS		0.9436	0.9436	0.9541	2007	1.1745	0.1821	
2200 G	GAS		0.9753	0.9753	1.0025	2008	1.1927	0.1977	
2200 G	GAS		1.0000	1.0000	1.0000	2009	1.1807	0.1891	

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2FO005.000 Meter Reading Clerical Operations
Meter Reading Handheld System Training

Year	FTEs	TTL \$	Lbr \$	Nlb \$
2012	0.1	\$12,925	\$12,925	\$0
	0.14	\$12,925	\$12,925	\$0
<p><u>MR System & Handheld Training on new or upgraded system</u> 18 MR Clerks 2 Saturdays - Overtime Labor: (2 days x 8 hrs/day) x (\$29.92/hr ST x 1.5) x 18 clerks NLB: (18 clerks x \$10/person lunch x 2 days - shown in 2FO 004.000) FTE: (2 days x 8 hrs/day x 18 clerks) / 2088 hrs/year</p>				
2012	GRC Total For 2FO 005.00	(dollars in '000s)	\$13	\$13
			\$0	\$0

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**SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 Workgroup 2FO006.000 Meter Reading Supv/Training/Programs**

		(all dollars in '000s)			
Year		FTEs	TTL \$	Lbr \$	Nlb \$
	<u>Meter Reading Management (unfilled positions from 2008 GRC)</u> See E. TY 2008 GRC & AMI Workpapers - Management Various-MR Mgmt (1 Lead FI & 5 Supervisors for 6 positions at ST-2 mid-point) Labor: (\$69,500 annual salary at ST-2 mid-point x 6 FTEs) NLB: (\$3,916 x 6 FTEs) FTE: (6 FTEs x 2088 hrs/year) / 2088 hrs/year	TY 2012 6.0	\$440,496.0	\$417,000.0	\$23,496.0
2012	<u>MR System & Handheld Training on new or upgraded system</u> Various-MR Mgmt Saturdays - Overtime Labor: (6 hrs) x (avg. blended hrly wage of \$32.91/hr ST x 1.5) x 29 MR Supvs NLB: (29 Supvs x \$10/person lunch - shown in 2FO 004.000) FTE: (6 hrs x 29 Supvs) / 2088 hrs/year Labor: (2 days x 8 hrs/day) x (avg. blended hrly wage of \$35.481/hr ST x 1.5) x 2 MR Operations Support Supvs NLB: (2 MR Op Support Supvs x \$10/person lunch x 2 days - shown in 2FO 004.000) FTE: (2 days x 8 hrs/day x 2 MR Op Support Supvs) / 2088 hrs/year Labor: (6 hrs) x (avg. blended hrly wage of \$27.00/hr ST x 1.5) x 8 Fld Instrs NLB: (8 Fld Instructors x \$10/person lunch - shown in 2FO 004.000) FTE: (6 hrs x 8 Fld Instructors) / 2088 hrs/year Labor: (8 hrs) x (avg. blended hrly wage of \$27.00/hr ST x 1.5) x 4 Fld Instrs serving as Handheld session trainers (Meter Readers to be split in 4 groups) NLB: (4 Fld Instructors x \$10/person lunch - shown in 2FO 004.000) FTE: (8 hrs/day x 4 Fld Instructors) / 2088 hrs/year	TY 2012 0.1	\$13,532.6	\$13,532.6	\$0.0
2012		0.08	\$8,589.5	\$8,589.5	\$0.0
		0.02	\$1,703.0	\$1,703.0	\$0.0
		0.02	\$1,944.0	\$1,944.0	\$0.0
		0.02	\$1,296.0	\$1,296.0	\$0.0
2012	GRC Total For 2FO 006.00	6.1	\$454	\$431	\$23

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
Workgroup 2FO007.000 Meter Reading Staff Support
08 GRC Authorized & SCG AMI Benefit Positions

Year	(all dollars in '000s)	FTEs	TTL \$	Lbr \$	Nlb \$	
	Meter Reading Management (unfilled positions from 2008 GRC)	TY 2012	9.0	\$660,744	\$625,500	\$35,244
	See E. TY 2008 GRC & AMI Workpapers - Management					
2012	Various-MR Mgmt (4 AMR & 5 Amigo Analysts for 9 positions at ST-2 mid-pt) Labor: (\$69,500 annual salary at ST-2 mid-point x 9 FTEs) NLB: (\$3,916/FTE x 9 FTEs) FTE: (9 FTEs x 2088 hrs/year) / 2088 hrs/year	9.00	\$660,744	\$625,500	\$35,244	
2012	GRC Total For 2FO 007.00	9.0	\$661	\$626	\$35	

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
2FO006.000 Meter Reading Supervisor/Training/Programs & 2FO007.000 Meter Reading Staff Support
TY 2008 GRC Workpapers - Management

Workpaper as Presented in A. 06-12-010 TY 2008 GRC
 Exhibit SCG-7-WP Workpapers to Prepared Direct Testimony of J. Patrick Petersilia; p. JPP-WP-102

Attachment JPP_SCG_NSS_WPA_902-5.xls
Meter Reading Management

<u>NSS - FERC 902.5</u>		(all dollars in 2005 \$000s)			
Year		FTEs	TTL \$	Lbr \$	Nlb \$
	Meter Reading Management (balance of positions filled in 2005)	0.5	\$33.8	\$32.0	\$1.8
2006	MR Supervisor filled in mid-year 2005 - 2006 balance of FTE Labor: (\$64,000 annual salary x .5 FTE) NLB: (\$3,500 per FTE x .5 FTE)	0.50	\$33.8	\$32.0	\$1.8
	Meter Reading Management (new supervision)	1.0	\$67.3	\$63.8	\$3.5
2006	MR Supervisor (1 position at ST-2 mid-point - Orange Coast) Labor: (\$63,800 annual salary at ST-2 mid-point per FTE) NLB: (\$3,500 per FTE)	1.00	\$67.3	\$63.8	\$3.5
	Meter Reading Management (new managerial supervision)	1.0	\$87.1	\$80.6	\$6.5
2006	MR Area Mgr (1 position at ST-4 mid-point) Labor: (\$80,600 annual salary at ST-4 mid-point per FTE) NLB: (\$6,500 per FTE)	1.00	\$87.1	\$80.6	\$6.5
	Meter Reading Management (RAMR reduction-see RAMR backup)	-1.0	-\$66.8	-\$63.8	-\$3.0
2008	MR Supervisor (-1 position at ST-2 mid-point) Labor: (\$63,800 annual salary at ST-2 mid-point per FTE) NLB: (\$3,000 per FTE)	-1.00	-\$66.8	-\$63.8	-\$3.0
	Meter Reading Management (new positions)	0.7	\$48.7	\$45.7	\$3.0
2006	MR Advisor (1 position at AD-1 mid-point - eff. 05/2006) Labor: (\$68,500 annual salary x .67 FTE) NLB: (\$3,000 for training and Emp. expenses)	0.67	\$48.7	\$45.7	\$3.0
	Meter Reading Management (balance of positions filled in 2005)	1.8	\$98.1	\$91.7	\$6.4
2006	MR Field Instructors filled in Dec 2005 - 2006 balance of FTEs Labor: (\$64,000 annual salary x .5 FTE) NLB: (\$3,500 per FTE x .5 FTE)	1.83	\$98.1	\$91.7	\$6.4
	Meter Reading Management (new Lead Field Instructor)	1.0	\$67.0	\$62.5	\$4.5
2006	MR Lead FI (1 position at SA-4 mid-point - eff. July 2006) Labor: (\$62,500 annual salary at SA-4 mid-point per FTE) NLB: (\$4,500 per FTE)	0.50	\$33.5	\$31.3	\$2.3
2007	MR Lead FI (Balance of position from 2006) Labor: (\$62,500 annual salary at SA-4 mid-point per FTE) NLB: (\$4,500 per FTE)	0.50	\$33.5	\$31.3	\$2.3
	Meter Reading Management (new positions)	18.0	\$1,211.4	\$1,148.4	\$63.0
2007	Various-MR Mgmt (9 positions at ST-2 mid-point) Labor: (\$63,800 annual salary at ST-2 mid-point per FTE) NLB: (\$3,500 per FTE)	9.00	\$605.7	\$574.2	\$31.5
2008	Various-MR Mgmt (9 positions at ST-2 mid-point) Labor: (\$63,800 annual salary at ST-2 mid-point per FTE) NLB: (\$3,500 per FTE)	9.00	\$605.7	\$574.2	\$31.5
		FTEs	TTL \$	Lbr \$	Nlb \$
2005	Adjusted base	45.2	\$3,108	\$2,684	\$424
	Total of Forecast (2006-2008)	23.0	\$1,547	\$1,461	\$86
2008	GRC Total	68.2	\$4,654	\$4,145	\$509

**SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 2FO006.000 Meter Reading Supervisor/Training/Programs & 2FO007.000 Meter Reading Staff Support
 SCG AMI Workpaper - Management**

Workpaper as Presented in A. 08-09-023 SoCalGas AMI
 Errata Workpapers for Chapter III SoCalGas AMI Deployment Plan, Costs, and Operational Benefits Prepared Direct Testimony of Mark L. Serrano; p. 141

GRC Mgmt Cost Benefits

Note - 1 Fld Instructor & 1 Supvr hired in 2007 and embedded in 2007 Cost Per Read included in 2007 recorded benefits; analyst hired 4Q - assume not included in recorded 07 benefits

In 2008 \$'s	08 Incom Salary STI (w/o V&S)	Total Labor In SCE Overlap -----	98% Proportional Reduction/Avoidance		
Field Instructors	1 \$ 58,188	\$ 58,188			
Supervisors	5 \$ 58,188	\$ 290,938			
AMR Analysts/Adv.	4 \$ 58,188	\$ 232,750	For 3	For 1	For 2
Route Analysts	5 \$ 58,188	\$ 290,938	\$171,385	\$57,128	\$114,256
	15	\$ -			
Non-labor -	2005 \$'s				
Field Instructors	1 \$ 3,500	\$ 3,843			
Supervisors	5 \$ 3,500	\$ 19,215			
AMR Analysts/Adv.	4 \$ 3,500	\$ 15,372	For 3	For 1	For 2
Route Analysts	5 \$ 3,500	\$ 19,215	\$11,319	\$3,773	\$7,546

AMR Analysts/Advisors - Add 4 positions during deployment years. Post-deployment, start with 1 and move to 3 positions (one per Meter Reading geographic area) for coordination of MSA corrosion inspections and corrosion route management

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT
 USS Cost Center 2200-0370 Meter Reading Aliso Viejo
 Detailed Workpaper Calculations

Year	Retained	FTEs	TTL \$	Lbr \$	Nlb \$
2010-12	<u>Part-time Meter Reader wage increase adjustment-gas</u> See C. SCG PT Meter Reader wage increase - USS 2200-0370 1.9% increase to PT wage to bring it up to 3.5% CBA	0.0	\$10,696	\$10,696	\$0
2010-11	<u>Part-time Meter Reader wage increase adjustment-electric</u> See C. SCG PT Meter Reader wage increase - USS 2200-0370 1.9% increase to PT wage to bring it up to 3.5% CBA	0.0	\$5,008	\$5,008	\$0
2012	<u>Elimination of electric meter reading - Smart Meter completion</u> End direct billed meter reading of electric meters for SDG&E Labor: (Blended ST & OT PT rate of \$18.33/hr x 10.2 FTEs x 2088 hrs/year) NLB: (\$2167 x -10.2 FTEs) FTE: -10.2 * FTEs, although performing shared services activities, are "retained" by the entity for whom they are employed	-10.2	-\$412,488	-\$390,385	-\$22,103
2012	GRC Total For USS 2200-0370	-10.2	\$11	\$11	\$0
	(dollars in '000s)		-\$412	-\$390	-\$22

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT

USS Cost Center 2200-0370 Meter Reading Aliso Viejo

Part-time Meter Reader Wage Increase Calculations - Part 1 of 3

	Historical					Forecast			
	2005	2006	2007	2008	2009	5 Yr Avg	2010	2011	2012
Percentage impact									
a PT wage increase %	1.1%	1.0%	1.0%	1.6%	3.5%	1.6%			
b Current 5 yr avg forecast							1.6%	1.6%	1.6%
c Adjustment to bring up % to 3.5%							1.9%	1.9%	1.9%
d Adjusted 5 yr avg forecast percentage							3.5%	3.5%	3.5%

2008/2009 Agreement - 3.5% for all PT

Notes/Calculations:

- a Blended PT wage increase percentage for PT-1 and PT-3 meter readers in the stated year; in late 2008, the new Agreement increased all Part-time wages to 3.5% wage increase
- b 5 year average percentage of years 2005-2009
- c Adjustment percentage to bring 5-year average percentage up to 3.5% (3.5% - 1.6% = 1.9%) [line 4 minus line 3]
- d Desired adjusted 5-year average percentage per 2008/2009 Company/Unions Agreement

	Historical					Forecast			
	2005	2006	2007	2008	2009	5 Yr Avg	2010	2011	2012
Dollars impact									
1 PT Adjusted Historical Labor (Nominal \$)	\$596,920	\$652,319	\$719,281	\$703,565	\$721,362	\$678,729			
2 PT Adjusted Historical Labor (Constant 2009 \$)	\$668,219	\$710,032	\$762,273	\$721,383	\$721,362	\$716,654			
3 Percentage adjustment from above							1.9%	1.9%	1.9%
4 5 yr avg forecast (constant 2009 \$)							\$716,654	\$716,654	\$716,654
5 Adjustment % (see above) applied to 5 year avg							\$13,301	\$13,301	\$13,301
6 Adjustment Amt with V&S							\$15,705	\$15,705	\$15,705

Notes/Calculations:

- 1 Part-time adjusted historical total labor (nominal \$s) obtained from GRID for stated year (all cost elements for Part-time labor)
- 2 Part-time adjusted historical labor in line 1 escalated to constant 2009 dollars [line 1 x appropriate escalation factor for labor]
- 3 Percentage adjustment calculated in "Percentage impact - line 3" needed to bring PT wage increases to 3.5%
- 4 5-year average forecast as calculated in line 2 (in constant 2009 dollars)
- 5 Percentage adjustment applied to 5-year average forecast [line 3 x line 4] (1.9% x \$719681)
- 6 Adjustment calculated in line 5 with V&S added [line 5 x appropriate 2009 V&S factor]

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SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT

USS Cost Center 2200-0370 Meter Reading, Aliso Viejo

Part-time Meter Reader Wage Increase Calculations - Part 2 of 3

	Historical					Forecast			
	2005	2006	2007	2008	2009	5 Yr. Avg	2010	2011	2012
7	Dollars impact - Allocation to Gas & Electric								
8	\$455,149	\$491,977	\$516,625	\$491,155	\$485,589	\$488,099			
9	\$213,070	\$218,054	\$245,649	\$230,228	\$235,773	\$228,555			
10							1.9%	1.9%	1.9%
11						\$488,099	\$488,099	\$488,099	\$488,099
12							\$228,555	\$228,555	\$228,555
13						\$9,059	\$9,059	\$9,059	\$9,059
14						\$4,242	\$4,242	\$4,242	\$4,242
15						\$10,696	\$10,696	\$5,008	\$10,696
									N/A

Notes/Calculations:

- 7 Part-time adjusted historical labor (nominal \$\$) obtained from GRID for stated year (escalated to constant 2009 dollars) adjusted to allocation percentage for each year for Gas
- 8 Part-time adjusted historical labor (nominal \$\$) obtained from GRID for stated year (escalated to constant 2009 dollars) adjusted to allocation percentage for each year for Electric
- 9 Percentage adjustment calculated in "Percentage impact - line 3" needed to bring PT wage increases to 3.5%
- 10 5-year average forecast for Gas as calculated in line 7 (in constant 2009 dollars)
- 11 5-year average forecast for Electric as calculated in line 8 (in constant 2009 dollars)
- 12 Percentage adjustment applied to 5-year average forecast [line 3 x line 4] (1.9% x \$490166)
- 13 Percentage adjustment applied to 5-year average forecast [line 3 x line 5] (1.9% x \$229515)
- 14 Adjustment calculated in line 5 with V&S added [line 6 x appropriate 2009 V&S factor]
- 15 Adjustment calculated in line 5 with V&S added [line 7 x appropriate 2009 V&S factor]

Escalation factors for 2200

		Labor	Non-labor	V&S factors	Lbr Factor	FTE factor
2200 G	GAS	0.8933	0.8907	2005	1.1705	0.1804
2200 G	GAS	0.919	0.9232	2006	1.1787	0.1832
2200 G	GAS	0.9436	0.9541	2007	1.1745	0.1821
2200 G	GAS	0.9753	1.0025	2008	1.1927	0.1977
2200 G	GAS	1.0000	1.0000	2009	1.1807	0.1891

SCG CUSTOMER SERVICE FIELD OPERATIONS & CUSTOMER CONTACT

USS Cost Center 2200-0370 Meter Reading Aliso Viejo

Part-time Meter Reader Wage Increase Calculations - Part 3 of 3

PT Labor from GRID Historical Data

	2005 GRID	2006 GRID	2007 GRID	2008 GRID	2009 GRID
SAL-TEMP P-T S/T	388,537	433,789	481,450	469,526	485,334
SAL-TEMP P-T S/T	178,044	191,227	227,577	218,318	235,623
SAL-TEMP P-T T&1/2	18,042	18,291	6,037	5,497	255
SAL-TEMP P-T T&1/2	12,285	9,165	4,217	4,348	150
SAL-TEMP P-T D/T	6	47			
SAL-TEMP P-T D/T	6				
PT Labor from GRID Historical Data Total	596,920	652,519	719,281	697,689	721,362

PT Labor from GRID Historical Data Total

	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
IO Ret Total	406,585	452,127	487,487	475,023	485,589
CC Subj Total	190,335	200,392	231,794	222,666	235,773
Gas	68.11%	69.29%	67.77%	68.09%	67.32%
Elec	31.89%	30.71%	32.23%	31.91%	32.68%

Allocation Percentage

2008 PT Wage Increase (Oct 2008 - December 2008) \$5,876.00

Beginning of Workpaper
2FO005.000 - Field Ops-MRdg-Clerical Opers

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 2. Field Ops-MRdg-Clerical Opers
 Workpaper: 2FO005.000 - Field Ops-MRdg-Clerical Opers

Activity Description:

Meter Reading Clerical Operations activities performed by non-management meter reading clerks at two locations (Chatsworth and Anaheim). Activities include timekeeping, payroll, scheduling and customer facility record updates.

Forecast Methodology:

Labor - 5-YR Average

Using a five-year average captures the high and low expenditures seen under a variety of conditions.

Non-Labor - 5-YR Average

Using a five-year average captures the high and low expenditures seen under a variety of conditions.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)							
	Adjusted-Recorded					Adjusted-Forecast		
	2005	2006	2007	2008	2009	2010	2011	2012
Years								
Labor	1,050	1,016	948	916	1,019	989	989	1,002
Non-Labor	19	26	26	15	19	21	21	21
NSE	0	0	0	0	0	0	0	0
Total	1,069	1,042	974	931	1,038	1,010	1,010	1,023
FTE	17.6	16.7	15.8	15.6	16.6	16.5	16.5	16.6

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 2. Field Ops-MRdg-Clerical Opers
 Workpaper: 2FO005.000 - Field Ops-MRdg-Clerical Opers

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	989	989	989	0	0	13	989	989	1,002
Non-Labor	5-YR Average	21	21	21	0	0	0	21	21	21
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		1,010	1,010	1,010	0	0	13	1,010	1,010	1,023
FTE	5-YR Average	16.5	16.5	16.5	0.0	0.0	0.1	16.5	16.5	16.6

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012	13	0	0	13	0.0	1-Sided Adj
Labor associated to training on a new handheld system and handhelds for Meter Reading Clerks (2 Saturdays, OT). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	0	0	0	0.1	1-Sided Adj
FTEs (.14) associated to training on a new handheld system and handhelds for Meter Reading Clerks (2 Saturdays, OT). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012 Total	13	0	0	13	0.1	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
Category-Sub: 2. Field Ops-MRdg-Clerical Opers
Workpaper: 2FO005.000 - Field Ops-MRdg-Clerical Opers

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	801	792	762	749	863
Non-Labor	17	24	25	15	19
NSE	0	0	0	0	0
Total	818	816	787	764	882
FTE	14.9	14.1	13.4	13.0	14.0
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	801	792	762	749	863
Non-Labor	17	24	25	15	19
NSE	0	0	0	0	0
Total	818	816	787	764	882
FTE	14.9	14.1	13.4	13.0	14.0
Vacation & Sick (Nominal \$)					
Labor	137	142	133	144	156
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	137	142	133	144	156
FTE	2.7	2.6	2.4	2.6	2.6
Escalation to 2009\$					
Labor	112	82	53	23	0
Non-Labor	2	2	1	0	0
NSE	0	0	0	0	0
Total	114	84	55	23	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	1,050	1,016	948	916	1,019
Non-Labor	19	26	26	15	19
NSE	0	0	0	0	0
Total	1,069	1,042	975	931	1,038
FTE	17.6	16.7	15.8	15.6	16.6

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 2. Field Ops-MRDg-Clerical Opers
 Workpaper: 2FO005.000 - Field Ops-MRDg-Clerical Opers

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000)				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Beginning of Workpaper
2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

Activity Description:

The workgroup represents Meter Reading Supervisors and Meter Reading Field Instructors directly overseeing and training the meter reading operations workforce. Also included in the workgroup are the costs for safety programs.

Forecast Methodology:

Labor - 5-YR Average

The five-year average best represents the actual staffing variations incurred over the years for supervisors, field instructors and safety programs.

Non-Labor - 5-YR Average

The five-year average best represents the actual non-labor variations incurred over the years by supervisors, field instructors and safety programs.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)							
	Adjusted-Recorded					Adjusted-Forecast		
Years	2005	2006	2007	2008	2009	2010	2011	2012
Labor	2,555	2,856	2,737	2,928	2,820	2,779	2,779	3,210
Non-Labor	270	361	505	446	410	398	398	421
NSE	0	0	0	0	0	0	0	0
Total	2,825	3,217	3,242	3,374	3,230	3,177	3,177	3,631
FTE	40.4	45.8	43.5	45.9	43.0	43.7	43.7	49.8

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	2,779	2,779	2,779	0	0	431	2,779	2,779	3,210
Non-Labor	5-YR Average	398	398	398	0	0	23	398	398	421
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		3,177	3,177	3,177	0	0	454	3,177	3,177	3,631
FTE	5-YR Average	43.7	43.7	43.7	0.0	0.0	6.1	43.7	43.7	49.8

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012	417	0	0	417	0.0	1-Sided Adj
GRC 2008 MR Supervisor/Field Instructor adjustment - labor for 6.0 FTEs for unfilled positions under the 2008 GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	14	0	0	14	0.0	1-Sided Adj
Labor associated to training of Meter Reading Supervisors and Field Instructors (also serving as instructors) on a new handheld unit & system (Saturday class, 6 hours, Overtime). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	23	0	23	0.0	1-Sided Adj
GRC 2008 MR Supervisor/Field Instructor adjustment - non-labor for 6.0 FTEs for unfilled positions under the 2008 GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	0	0	0	6.0	1-Sided Adj
GRC 2008 MR Supervisor/Field Instructor adjustment - 6.0 FTEs for unfilled positions under the 2008 GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	0	0	0	0	0.1	1-Sided Adj

FTEs for Meter Reading Supervisors and Field Instructors (also serving as instructors) on a new handheld unit & system (Saturday class, 6 hours, Overtime). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.

2012 Total	431	23	0	454	6.1	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
Workpaper: 2FO006.000 - Field Ops-MRda-Supv/Trna/Proa

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	2,032	2,248	2,188	2,394	2,389
Non-Labor	176	256	356	334	314
NSE	0	0	0	0	0
Total	2,209	2,504	2,544	2,728	2,703
FTE	35.0	38.9	36.6	38.3	36.2
Adjustments (Nominal \$) **					
Labor	-83	-21	11	0	0
Non-Labor	64	77	126	113	96
NSE	0	0	0	0	0
Total	-18	56	137	113	96
FTE	-0.8	-0.2	0.2	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	1,950	2,227	2,199	2,394	2,389
Non-Labor	241	334	482	447	410
NSE	0	0	0	0	0
Total	2,190	2,560	2,681	2,842	2,798
FTE	34.2	38.7	36.8	38.3	36.2
Vacation & Sick (Nominal \$)					
Labor	332	398	384	461	432
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	332	398	384	461	432
FTE	6.2	7.1	6.7	7.6	6.8
Escalation to 2009\$					
Labor	273	231	154	72	0
Non-Labor	30	28	23	-1	0
NSE	0	0	0	0	0
Total	302	259	178	71	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	2,555	2,856	2,737	2,928	2,820
Non-Labor	270	361	505	446	410
NSE	0	0	0	0	0
Total	2,825	3,217	3,243	3,374	3,230
FTE	40.4	45.8	43.5	45.9	43.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

Summary of Adjustments to Recorded:

In Nominal \$ (000)					
Year	2005	2006	2007	2008	2009
Labor	-83	-21	11	0	0
Non-Labor	64	77	126	113	96
NSE	0	0	0	0	0
Total	-18	56	137	113	96
FTE	-0.8	-0.2	0.2	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	0	71	0	0.0	CCTR Transf	From 2200-0005.018	DSREED2009091 1115032653
<p>Transfer of Safety & Performance Incentive Program costs recorded in Employee Recognition Cost Element 6120012 from Employee Recognition to SCG Meter Reading. These program costs are specific to the Meter Reading Organization and have always been forecast in Meter Reading's work papers.</p>							
2005	-83	0	0	0.0	CCTR Transf	To 2200-0357.000	TP1NBW2009090 4202257563
<p>Labor for for Meter Reading Operations Manager - in 2005, 2200-2153 was a USS cost center which later became a NSS cost center for Safety Programs in early 2006. Managers labor transferred to 2200-0357.</p>							
2005	0	-6	0	0.0	CCTR Transf	To 2200-0357.000	TP1NBW2009090 4202424943
<p>Non labor associated to Meter Reading Operations Manager whose labor was transferred to 2200-0357</p>							
2005	0	0	0	-0.8	CCTR Transf	To 2200-0357.000	TP1NBW2009090 4202542227
<p>Hours/FTE for Meter Reading Operations Manager whose labor was transferred to 2200-0357</p>							
2005 Total	-83	64	0	-0.8			
2006	0	77	0	0.0	CCTR Transf	From 2200-0005.018	DSREED2009091 1114923653
<p>Transfer of Safety & Performance Incentive Program costs recorded in Employee Recognition Cost Element 6120012 from Employee Recognition to SCG Meter Reading. These program costs are specific to the Meter Reading Organization and have always been forecast in Meter Reading's work papers.</p>							

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRdg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRdg-Supv/Trng/Prog

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	-21	0	0	0.0	CCTR Transf	To 2200-0357.000	TP1NBW2009091 4222728600
Labor for for Meter Reading Operations Manager - 2200-2153 was a USS cost center for several months and then became a NSS cost center for Safety Programs. Managers labor should be transfered to 2200-0357.							
2006	0	0	0	-0.2	CCTR Transf	To 2200-0357.000	TP1NBW2009091 4223019277
Labor hours for Meter Reading Operations Manager - cost center changed from USS to NSS early in 2006, with all costs for Manager transferred to 2200-0357							
2006 Total	-21	77	0	-0.2			

2007	11	0	0	0.0	CCTR Transf	From 2200-0397.000	ATPERSIN20090 904111829703
Management labor incorrectly charged to a non-management district cost center 2200-0397. Corrected to Area Manager Cost center 2200- 2024.							
2007	0	126	0	0.0	CCTR Transf	From 2200-0005.018	DSREED2009091 1115135687
Transfer of Safety & Performance Incentive Program costs recorded in Employee Recognition Cost Element 6120012 from Employee Recognition to SCG Meter Reading. These program costs are specific to the Meter Reading Organization and have always been forecast in Meter Reading's work papers.							
2007	0	0	0	0.2	CCTR Transf	From 2200-0397.000	TP1NBW2010031 7110021227
FTEs associated to management labor incorrectly charged to a non-management district cost center 2200- 0397. Corrected to Area Manager Cost center 2200- 2024.							
2007 Total	11	126	0	0.2			

2008	0	98	0	0.0	CCTR Transf	From 2200-0005.018	DSREED2009091 1115247080
Transfer of Safety & Performance Incentive Program costs recorded in Employee Recognition Cost Element 6120012 from Employee Recognition to SCG Meter Reading. These program costs are specific to the Meter Reading Organization and have always been forecast in Meter Reading's work papers.							
2008	0	15	0	0.0	CCTR Transf	From 2200-2237.000	TP1NBW2010042 1210040953
Mileage for managementt employees incorrectly recorded in District cost centers 2200-0365 (\$6425) and 2200-2237 (\$8260). Transferred to Supervisor cost center 2200-0358							

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 3. Field Ops-MRDg-Supv/Trng/Prog
 Workpaper: 2FO006.000 - Field Ops-MRDg-Supv/Trng/Prog

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008 Total	0	113	0	0.0			
2009	0	96	0	0.0	CCTR Transf	From 2200-0005.018	DSREED2010030 5173518110
Transfer of Safety & Performance Incentive Program costs recorded in Employee Recognition Cost Element 6120012 from Employee Recognition to SCG Meter Reading. These program costs are specific to the Meter Reading Organization and have historically been forecast in Meter Reading's work papers.							
2009 Total	0	96	0	0.0			

Beginning of Workpaper
2FO007.000 - Field Ops-MRdg-Staff Support

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 4. Field Ops-MRdg-Staff Support
 Workpaper: 2FO007.000 - Field Ops-MRdg-Staff Support

Activity Description:

Management expenses for Meter Reading Managers, Area Managers, Project Managers, Staff Team Leaders, Staff Advisors and Staff Analysts activities.

Forecast Methodology:

Labor - 5-YR Average

The five-year average captures the high and low expense levels that occur year over year.

Non-Labor - 5-YR Average

The five-year average captures the high and low expense levels that occur year over year.

NSE - 5-YR Average

NSE is not applicable to this workgroup.

Summary of Results:

	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
Years									
Labor	1,081	1,260	1,323	1,324	1,412	1,280	1,280	1,906	
Non-Labor	1,545	658	416	964	761	868	868	903	
NSE	0	0	0	0	0	0	0	0	
Total	2,626	1,918	1,739	2,288	2,173	2,148	2,148	2,809	
FTE	13.1	15.5	16.5	15.8	17.0	15.6	15.6	24.6	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 4. Field Ops-MRdg-Staff Support
 Workpaper: 2FO007.000 - Field Ops-MRdg-Staff Support

Forecast Summary:

Forecast Method		In 2009 \$(000)								
		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	5-YR Average	1,280	1,280	1,280	0	0	626	1,280	1,280	1,906
Non-Labor	5-YR Average	868	868	868	0	0	35	868	868	903
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		2,148	2,148	2,148	0	0	661	2,148	2,148	2,809
FTE	5-YR Average	15.6	15.6	15.6	0.0	0.0	9.0	15.6	15.6	24.6

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012	626	0	0	626	0.0	1-Sided Adj
GRC 2008 Analysts/Advisor Adjustment - labor for 9.0 FTEs for route and AMR analysis not filled under the last GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	35	0	35	0.0	1-Sided Adj
GRC 2008 Analysts/Advisor Adjustment - non-labor for 9.0 FTEs for route and AMR analysis not filled under the last GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012	0	0	0	0	9.0	1-Sided Adj
GRC 2008 Analysts/Advisor Adjustment - for 9.0 FTEs for route and AMR analysis not filled under the last GRC. Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations" for detailed analysis.						
2012 Total	626	35	0	661	9.0	

Southern California Gas Company
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Non-Shared Service Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Meter Reading
Category-Sub: 4. Field Ops-MRdg-Staff Support
Workpaper: 2FO007.000 - Field Ops-MRdg-Staff Support

Determination of Adjusted-Recorded:

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	742	961	1,063	1,082	1,253
Non-Labor	1,370	607	397	966	767
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	2,112	1,568	1,460	2,048	2,020
FTE	10.3	12.9	14.0	13.2	15.2
Adjustments (Nominal \$) **					
Labor	83	21	0	0	-57
Non-Labor	6	0	0	0	-6
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	89	21	0	0	-63
FTE	0.8	0.2	0.0	0.0	-0.9
Recorded-Adjusted (Nominal \$)					
Labor	825	982	1,063	1,082	1,196
Non-Labor	1,376	607	397	966	761
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	2,201	1,590	1,460	2,048	1,958
FTE	11.1	13.1	14.0	13.2	14.3
Vacation & Sick (Nominal \$)					
Labor	141	175	186	209	216
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	141	175	186	209	216
FTE	2.0	2.4	2.5	2.6	2.7
Escalation to 2009\$					
Labor	115	102	75	33	0
Non-Labor	169	51	19	-2	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	284	153	94	30	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	1,081	1,260	1,323	1,324	1,412
Non-Labor	1,545	658	416	964	761
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	2,626	1,918	1,740	2,287	2,174
FTE	13.1	15.5	16.5	15.8	17.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 4. Field Ops-MRdg-Staff Support
 Workpaper: 2FO007.000 - Field Ops-MRdg-Staff Support

Summary of Adjustments to Recorded:

In Nominal \$ (000)					
Year	2005	2006	2007	2008	2009
Labor	83	21	0	0	-57
Non-Labor	6	0	0	0	-6
NSE	0	0	0	0	0
Total	89	21	0	0	-63
FTE	0.8	0.2	0.0	0.0	-0.9

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	83	0	0	0.0	CCTR Transf	From 2200-2153.000	TP1NBW2009090 4202257563
Labor for for Meter Reading Operations Manager - in 2005, 2200-2153 was a USS cost center which later became a NSS cost center for Safety Programs in early 2006. Managers labor transferred to 2200-0357.							
2005	0	6	0	0.0	CCTR Transf	From 2200-2153.000	TP1NBW2009090 4202424943
Non labor associated to Meter Reading Operations Manager whose labor was transferred to 2200-0357							
2005	0	0	0	0.8	CCTR Transf	From 2200-2153.000	TP1NBW2009090 4202542227
Hours/FTE for Meter Reading Operations Manager whose labor was transferred to 2200-0357							
2005 Total	83	6	0	0.8			
2006	21	0	0	0.0	CCTR Transf	From 2200-2153.000	TP1NBW2009091 4222728600
Labor for for Meter Reading Operations Manager - 2200-2153 was a USS cost center for several months and then became a NSS cost center for Safety Programs. Managers labor should be transferred to 2200-0357.							
2006	0	0	0	0.2	CCTR Transf	From 2200-2153.000	TP1NBW2009091 4223019277
Labor hours for Meter Reading Operations Manager - cost center changed from USS to NSS early in 2006, with all costs for Manager transferred to 2200-0357							
2006 Total	21	0	0	0.2			

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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Meter Reading
 Category-Sub: 4. Field Ops-MRdg-Staff Support
 Workpaper: 2FO007.000 - Field Ops-MRdg-Staff Support

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009	-57	0	0	0.0	1-Sided Adj	N/A	TP1NBW2010032 1234115673
Removal of the incremental SCG AMI Project Management Office (PMO) related expenses for administrative, deployment planning, and information technology tasks.							
2009	0	-6	0	0.0	1-Sided Adj	N/A	TP1NBW2010032 1234151283
Removal of the incremental SCG AMI Project Management Office (PMO) related expenses for administrative, deployment planning, and information technology tasks.							
2009	0	0	0	-0.9	1-Sided Adj	N/A	TP1NBW2010032 1234209603
Removal of the incremental SCG AMI Project Management Office (PMO) related expenses for administrative, deployment planning, and information technology tasks.							
2009 Total	-57	-6	0	-0.9			

Supplemental Workpapers for Workpaper 2FO007.000

Exhibit SCG-07-WP
Customer Service Field

2FO007.000_Supp1.pdf

Miscellaneous Revenues
Seismic Services

Resolution G-2972

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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
COMMISSION ADVISORY AND COMPLIANCE DIVISION
Energy Branch
RESOLUTION G-2972
November 20, 1991

R E S O L U T I O N

RESOLUTION G-2972. SOUTHERN CALIFORNIA GAS COMPANY REQUEST FOR AUTHORITY TO: (1) IMPLEMENT TWO NEW PILOT TEST SERVICE OFFERINGS TO ITS RESIDENTIAL CUSTOMERS, WRAPPING AND STRAPPING OF GAS HOT WATER HEATERS, AND CONNECTING GAS APPLIANCES; (2) CHARGE \$25.00 PER SERVICE CALL WITH A SET-TIME APPOINTMENT OPTION.

BY ADVICE LETTERS NOS. 2078 AND 2079, FILED ON OCTOBER 18, 1991.

SUMMARY

1. The Southern California Gas Company (SoCal) filed Advice Letters (AL) 2078 and 2079 on October 18, 1991 requesting authority to offer two pilot services to residential customers - (1) wrapping and strapping of water heaters and various appliance connections for a fee (AL 2078); (2) offer a set-time appointment service call within one-half hour, plus or minus, of the time requested for \$25.00 per visit (AL 2079).

2. This Resolution approves the requests with modifications, and requires SoCal to file tariffs for the services as well as maintain a memorandum account as requested.

BACKGROUND

WRAP & STRAP and Appliance Connection (AL 2078)

1. AL 2078 was filed by SoCal to promote energy conservation and minimize the possible movement of water heaters during an earthquake. SoCal would install water heater blankets and anchor (strap) 20 to 50 gallon residential water heaters at the following estimated costs:

- (1) Strapping of hot water heater not anchored to the structure.....\$79.00
- (2) Wrapping of hot water heater where water heater is not insulated to at least an R-6 value.....\$42.00
- (3) Strapping of water heater and installation of the blanket.....\$93.00

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Resolution G-2972
SoCal AL 2078, AL 2079/dog/dug

November 20, 1991

Site specific estimates may vary in cost depending on labor time expended by service representatives and the complexity of the job.

2. Currently, SoCal will connect residential appliances (gas ranges and dryers) at no charge when turning on new service. This service will continue. AL 2078 would provide the connection of gas appliances for existing customer accounts at the following charges:

To connect a gas range or dryer, standard connection, if parts are not needed.....	\$38.00
Installation and valve.....	\$43.00
Installation, connector and valve...	\$53.00
Installation for a Bar-B-Que.....	\$106.00

3. SoCal proposes that a written estimate approved by the customer must be executed before any service is rendered.

4. Billing for the services rendered under the wrap and strap and appliance connection service offerings is proposed by SoCal to be due and payable upon completion of work. SoCal also proposes that if the customer is unable to pay the fee at the time service is rendered, payment will be made on a deferred payment basis. Customers will be billed and required to remit payment within 30 days. Billings for the wrap and strap and appliance connection service is proposed to be processed separately from the regular gas bill.

5. SoCal proposes that net revenues from these service offerings (revenues net of expenses for parts and supplies) should be accounted for separately and held for disposition by the Commission in SoCalGas' next cost allocation proceeding. The experience from this interim program will provide the basis for establishing appropriate revenue credits in conjunction with SoCal's next general rate case.

APPOINTMENT SERVICE (AL 2079)

6. AL 2079 would provide for set-time appointment service calls at \$25.00 per visit. The new policy of offering set-time appointment service calls would provide customers specifically scheduled appointments, upon request, for authorized types of non-emergency service calls. These set-time appointment service calls would be available with the mid-points for expected arrivals on the hour or half-hour (e.g. with an appointment at 12:30, SoCal could arrive between 12:00 and 1:00) Monday through Friday from 8:00 a.m. to 7:00 p.m. for days subsequent to the day when the customer books an appointment. The service would not be available on week-ends and legal holidays.

7. The agreed-upon time shall be deemed to have been met and the charge of \$25.00 will be assessed if the representative arrives at the customer's premise within plus or minus 30 minutes (or a one hour span of time) of the agreed-upon time.

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8. SoCal proposes that the customer will be advised at the time the service call is scheduled that the \$25.00 charge will be collected when service is rendered. If the customer indicates they will be unable to make payment, no work would be performed by SoCal.

9. SoCal will continue to offer, at no charge, morning appointments where the representative would arrive at the customer's premise between 7:00 a.m. and noon, and afternoon appointments, where the representative would arrive at the customer's premise between 1:00 p.m. and 5:00 p.m. In addition, for the first time and at no charge, SoCal will offer early evening appointments between the hours of 5:00 p.m. and 8:00 p.m.

10. SoCal's service representatives will still offer service between 9:00 a.m. and 1:00 p.m. and 1:00 p.m. to 5:00 p.m. as required by Senate Bill 101. These four hour appointment windows (compared to the new one hour appointment) continue to be offered without charge.

11. San Diego Gas & Electric Company (SDG&E) was authorized by Commission Decisions 85-12-108 and 85-12-104 to charge \$60.00 for service established at a specified time during regular workdays. For SDG&E customers, work must begin within 30 minutes (half the interval of SoCal's new appointment) after the time specified in the request. Other energy utilities such as CP National and Southwest Gas Company have tariff provisions similar to SDG&E's.

NOTICE

1. The advice letters were noticed by publication in the Commission Calendar. Southern California Gas Company also provided direct notice to other parties as required by Commission practices and rules. In addition, SoCal has published notice of the intended service offerings in local newspapers.

PROTESTS

1. Adee Plumbing & Heating, Inc. protests Advice Letter 2078 by letter dated October 28, 1991. Jack Oal Stephan, President, objects to what he terms unfair competition as exemplified by SoCal's advertisement of its proposed services. Similar protests and informal letters, quite numerous and citing the same essential issue, are listed in Appendix A.

2. In response, SoCal asserts that no installations will require permit work, and therefore the service representatives will only install and will do no plumbing. After a review of SoCal's costs, it does not appear it will use an unfair advantage for the wrap and strap and the appliance connection services.

3. The Division of Ratepayer Advocates (DRA) protested both advice letters by a letter dated November 7, 1991. DRA believes

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there could be potential conservation benefits to the wrap and strap service and that seismic safety benefits exist. It is concerned about the intertwining of this service with Demand Side Management (DSM) programs. SoCal has stated that DSM programs do not include wrap and strap in its territory.

4. DRA recommends that for services under Advice Letter 2078, "(1) the Commission authorize the new services on an interim basis with a termination date of December 31, 1993, (2) the revenues generated be returned to ratepayers, and (3) the pilot programs be fully evaluated in the next general rate case."

5. DRA recommends the rejection of Advice Letter 2079 stating "(c)ustomers will benefit from the increased flexibility as a result of the expanded service. Although some customers would benefit from the additional flexibility provided by Set-Time Appointments, a \$25 fee for Set-Time Appointments raises highly controversial equity questions." DRA does not elaborate or describe the equity questions nor does it say why they are controversial. DRA recommends this be in a general rate proceeding where all parties have an opportunity to voice their concerns.

6. Toward Utility Rate Normalization (TURN) filed a protest on the \$25 set-time appointment service calls proposed by SoCal in AL 2079. TURN's concern is that the utility will provide a higher quality of service based upon the customer's ability to pay. Historically, service calls provided by SoCal has never been based on cost. The quality of the proposed service has always been the same for all consumers within a given customer class. TURN is concerned that the quality of the existing free service will begin to deteriorate over time if a fee-for-service plan is adopted. TURN does support SoCal's proposal to offer evening appointments with a 5:00 p.m. to 8:00 p.m. time window at this time. This may preempt the need for set-time appointments at a cost of \$25.00. TURN submits that the proposed \$25.00 fee for set-time appointments should be rejected.

7. CACD believes the \$25.00 set-time appointment should be accepted because it offers customers an option to the four-hour wait customer's typically endure. The cost of the set-time appointment program will not be borne by residential or non-residential ratepayers, with the charge to the customer offsetting all costs incurred by SoCal. This program is already in place and effective in San Diego Gas & Electric Company and other utilities, and there does not appear to be any reason why it should not be available in SoCal territory as well.

DISCUSSION

1. There could be several problems with the proposal by SoCal to collect on the site for these services. Cash transactions may pose a problem by making field representatives more vulnerable to crimes. In its initial response to a request for further information by the Commission Advisory & Compliance

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Division (CACD) SoCal indicated that for wrap and strap and appliance installation "customers may pay at the time the service is provided or be billed". But for set-time 60 minute appointments, "the following are reasons for collecting at the time of the field call: (a) To reduce any losses from uncollectible debt; (b) Since this charge is not associated with gas usage our collection leverage is minimal; and (c) The revenue collected under this program will be held in a special account and returned to the CPUC."

2. Clearly, SoCal does not have a consistent view on collecting the charges. These should be tariffed services and neither should require payment at the time of service. In the case of set time appointments where customers might later try to deny that they were informed of the charge and dispute their billing, SoCal should instead require that customers sign a release acknowledging responsibility for the charge. CACD sees no significant equity question to delay offering this service now. Customers will have the added choice of evening appointments at no charge in addition to the four hour morning and afternoon appointments. The shorter time appointment is entirely optional and no harm has been suggested by its offering.

3. These programs, wrap and strap and appliance connections, and set-time appointment field service call should not result in unfair use of monopoly power over other service providers. The common thread in the formal protests and informal letters to the Commission concerning mainly Advice Letter 2078 is that SoCal will provide services at a lower charge than licensed plumbers. SoCal states the company will perform no service which requires a building permit, inspection or license. CACD believes that as long as SoCal prices its service at or above its full cost then the customers are entitled to the choice of a plumber or SoCal. That is true competition; if SoCal fully covers its costs then there is a benefit to the ratepayer by it offering the service. The Commission should shelter neither the utility nor the independent plumbers.

4. CACD has no objection to enhanced service with a tariff rate based on recovering the full cost of providing the enhanced services. The fully allocated cost should include the depreciation and return on rate base for fixed assets such as trucks, inventory, and the service dispatch center, etc., to ensure that there is no cross subsidy which would allow SoCal to compete unfairly with other service providers. We have reviewed SoCal's rates for the wrap and strap services compared with four contractors providing water heater strapping services. An evaluation of SoCal's pricing does not reflect monopolistic pricing below the SoCal cost of service with the objective to eliminate competition even though SoCal's costs could be less than the contractors' full charge. The contractors selected were:

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November 20, 1991

<u>Name</u>	<u>Hourly Rate</u>	<u>Trip Charge</u>
1. Adee Plumbing and Heating	1 hour minimum \$45.00	No Trip Charge
2. Mike Diamond	\$59.95	No Trip Charge
3. George Brazil	\$59.95	No Trip Charge
4. Santa Maria Appliance Residential Appliance Services	\$36.00	\$26.00

CACD firmly believes that SoCal should not be granted authority to charge customers based solely upon its representation of estimated charges but that SoCal should be required to charge at fixed rates on file in its tariff books. SoCal could seek subsequent rate changes by advice letter or in its subsequent general rate cases or other application.

5. SoCal should prepare proper accounting records and procedures to segregate these new services and accumulate the fully loaded costs for direct time and materials as well as all overhead loadings to record the cost of providing these services. SoCal should also prepare an annual cost study and a detailed report for these programs due on March 1, 1993 and sent to CACD's Energy Branch. SoCal should also report the number of services performed for wrap and strap, and appliance connection as well as the costs of the set-time appointment service in the Annual Report.

6. As regulated services, the rates for wrap and strap, appliance connection and set-time appointment service should be filed in SoCal's Tariffs under the authority of General Order 96-A, Section V.

7. The service to new order customers at no charge for gas ranges and dryer appliance connections will not be changed. For existing customers, wrap and strap and appliance connections will be offered at the tariffed rates.

8. SoCal proposes a memorandum account for the "net revenues" and proposes that the Commission review that account later. CACD recommends that SoCal maintain a full cost of service and revenue memorandum account to ensure the services are never cross-subsidized. The next general rate case seems to be the most appropriate vehicle to review these costs and either incorporate them into base rates or terminate them based upon the record at that time.

FINDINGS

1. San Diego Gas & Electric Company, by Decision 85-12-108, dated January 1, 1986 was authorized to offer a time-specific appointment of one-half hour within a specified time for residential customers at a charge of \$60.00 per visit. By Commission Decision 85-12-103 dated December 20, 1985, Southwest Gas Corporation was authorized to offer time specific appointments at a cost of \$40.00 to customers.

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2. CACD believes that as long as SoCal prices the service at or above its cost to provide the service its customers will benefit and there would be no unfair competition. SoCal is also restricting the service to minor connections which do not require permits or licensing.
3. Ratepayers will not subsidize these programs. The advice filings indicate that the service charges adopted will not increase any existing rate or charge, conflict with any rule or schedule, or cause the withdrawal or reduction of any existing service.
4. This programs will enhance customer service, safety and conservation. Service will be expanded to 8:00 p.m. for non-emergency services. A wrapped gas hot water heater has been shown to be more efficient as well as being safer.
5. SoCal has not shown that it is reasonable to demand payment upon service. SoCal should allow customers to sign a release for inclusion of charges for both set-time appointments and the wrap and strap and appliance connections.
6. SoCal has not shown that it should only indicate estimated costs but that the services should be offered at fixed tariffs. SoCal may seek rate relief if these rates are not compensatory over time.
7. SoCal should maintain a full cost of service and revenue memorandum account with the disposition of the account and the future of these services determined in the next general rate case.

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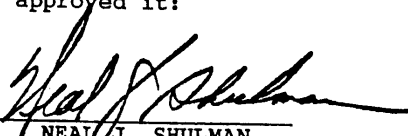
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SoCal AL 2078, AL 2079/dog/dug

November 20, 1991

THEREFORE, IT IS ORDERED that:

1. Southern California Gas Company's Advice Letters 2078 and 2079 should be approved as modified.
2. Southern California Gas Company should submit a report on March 15, 1993 citing the costs and revenues on a fully allocated cost basis of wrap and strap and appliance connection programs and the set-time appointments.
3. Southern California Gas Company shall submit a supplement to both Advice Letters 2078 and 2079 to include tariff sheets and full descriptions for both the wrap and strap and appliance installation program and the set-time appointment service and to allow customers to authorize inclusion of the service charge in their monthly bills.
4. Southern California Gas Company shall maintain a memorandum account containing the fully allocated cost of service as well as the revenues for both the wrap and appliance installation services and the set-time appointment services.
5. Southern California Gas Company must file the supplemental Advice Letters 2078 and 2079 before it begins to offer these services.
6. This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on November 20, 1991. The following Commissioners approved it:


NEAL J. SHULMAN
Executive Director

PATRICIA M. ECKERT
President
DANIEL Wm. FESSLER
NORMAN D. SHUMWAY
Commissioners

Commissioner John B. Ohanian,
being necessarily absent, did
not participate.

Resolution G-3438

DATE OF ISSUANCE: 01/25/10

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION G-3438
DATE: January 21, 2010

R E S O L U T I O N

Resolution G-3438. Southern California Gas Company (SoCalGas) request for approval of revisions to its Rule 10 - Service Charges.

Proposed Outcome:

SoCalGas proposes to increase the charges for appliance connections and seismic valve services, add charges for some equipment pieces, and revise tariff language related to bill payment for these services.

- 1) SoCalGas' request to revise the fees related to seismic valve services is denied.
- 2) SoCalGas' request to reduce the amount of time that bills are due, if billing is done separately from the monthly gas bill, is denied.
- 3) SoCalGas' request to revise existing tariff language to enable it to terminate service for failure to timely pay for the seismic valve service and other appliance connection charges is denied.
- 4) All other aspects of SoCalGas' request are approved.

Estimated Cost: \$222,629

By Advice Letter 3995 filed on June 22, 2009.

SUMMARY

This Resolution partly approves SoCalGas' revisions to its service charges proposed in Advice Letter (AL) 3995 as summarized below:

- 1) SoCalGas' request to increase the charges for appliance connections, which are billed directly to the customers who request such services, is approved.
- 2) SoCalGas' request to expand the list of charges for certain pieces of equipment needed for these services and to charge for gas log installation is also approved.
- 3) SoCalGas' request to increase the fees for seismic valve services is denied. SoCalGas does not have the authority to request increases in fees for seismic valve services by advice letter.
- 4) SoCalGas' request to reduce the amount of time that bills are due, when billing is done separately from the monthly gas service bill, is denied. SoCalGas provided insufficient justification for this reduction.
- 5) SoCalGas' request to revise existing tariff language to enable it to terminate service for failure to timely pay for the seismic valve service and other appliance connection charges is denied.

BACKGROUND AND DESCRIPTION OF PROPOSALS

Resolution G-2972, dated November 20, 1991, approved SoCalGas' request to charge a fee for connecting its customers' gas appliances. Customers have the option to obtain this service from non-utility providers such as plumbers and contractors.

Resolution G-2972 (which addressed appliance connections and set-timed appointments) provided that SoCalGas "...may seek rate relief if these rates are not compensatory over time" and that SoCalGas may request rate relief for these services by an advice letter. SoCalGas submitted AL 3995 as a Tier 3 advice letter under GO 96-B, Energy Industry Rule 5.3.

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Non-Shared Service Workpapers

Resolution G-3438
SoCalGas/AL 3995/beg

January 21, 2010

In AL 3995, SoCalGas proposes to increase the charges for appliance connections. SoCalGas proposes to increase the charges for these services, add charges for specific pieces of equipment needed to provide these services, and to add a fee for the installation of "gas logs" in fireplaces. SoCalGas claims that these charges reflect the actual cost of providing these services in order to prevent rate subsidization and to provide more flexible options to SoCalGas' customers. SoCalGas states that customer demand compels them to add installation of gas logs to their program.

According to SoCalGas, the proposed increases in these charges are needed to reflect increases in labor, gasoline, administrative costs, modifications of manufacturers' standards, technology advances and more challenging customer needs. SoCalGas states that the charges for appliance connections have not been changed since 1991, when they were first approved.

SoCalGas also proposes to increase the charges for restoring service after a seismic valve activates to reflect increases in costs over the past seven years. The current charges have been in effect since 2002. Decision (D.) 01-11-068 authorized SoCalGas to directly charge customers who request seismic valve services. D.01-11-068 states that the installation, maintenance and removal of the earthquake valve are the responsibility of the owner and not the utility. In addition, the decision affirms that when the earthquake valve shuts off gas for any reason, the restoration of gas service should not be subsidized by the utility's ratepayers. Language in the tariff allows the utility the option to waive the charges for restoration of service after a major earthquake. SoCalGas Rule 10 states the charges for such services.

Customers currently may pay the charge for these services either at the time of service or by separate billing. SoCalGas now proposes to eliminate the option to pay at the time of service. SoCalGas currently gives its customers the option to pay for set-timed appointments, appliance connection charges, or seismic valve service at the time service is rendered or by separate billing. However, SoCalGas states that customers have conveyed to utility employees that a separate bill is the preferred payment option, and that SoCalGas has been unable to collect field payments 65% of the time. In addition, SoCalGas wishes to more clearly separate the billing function from its service function. Finally, SoCalGas claims that there is a safety issue associated with service employees collecting payments once the service has been provided.

SoCalGas proposes to revise the current language of Rule 10.F and G.5 to eliminate the option of bill payment at the time of service completion. Instead, SoCalGas will allow customers the option of having the bill included on their monthly gas bill or being billed separately.

SoCalGas proposes that payment will be due in 20 days if the customer is billed separately, in lieu of the current due date of 30 days. SoCalGas stated that the charges for the set-timed appointment and appliance connection charges are likely to be billed with the bill for gas service. Under paragraph C.1 of Rule Number 9, residential customers who are normally billed monthly have a minimum of 34 calendar days between the date of mailing the bill and the date of service termination for non-payment. Non-residential customers must pay their gas bills within shorter time periods. SoCalGas asserts that this language aligns billing for all customers utilizing these service offerings.

SoCalGas also proposes to delete the current tariff language which states that the gas service will not be terminated for failure to pay for the seismic valve service. SoCalGas proposes to delete the language in Section 10.G.5 of Rule 10 stating "...but will not terminate gas service for failure to pay for any services rendered pursuant to this section." According to SoCalGas, the inability to terminate gas services for failure to pay for Seismic Valve Service places undue burden on other ratepayers which have to absorb any subsequent write-off amounts due to the non-payment by some customers. SoCalGas states that the inability to terminate gas services for failure to timely pay for the seismic valve service equates to subsidization which Resolution G-2972 explicitly prohibited.

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NOTICE

Notice of AL 3995 was made by publication in the Commission's Daily Calendar. SoCalGas states that a copy of the Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-B.

PROTESTS

Advice Letter 3995 was not protested.

DISCUSSION

SoCalGas' proposed increases in appliance connection charges are necessary to reflect cost increases due to inflation and expansion of its Appliance Connection Program which includes additional appliances and parts installations brought on by modifications of manufacturer's standards, technology advances, and greater customer needs. SoCalGas' charges reflect its costs for the appliance connection and seismic valve services. SoCalGas has not increased these fees since 1991. SoCalGas' addition of gas logs to its program is reasonable. SoCalGas' request to increase appliance connection fees and charge fees for specific pieces of appliance connection equipment is approved.

SoCalGas is not the sole provider of the appliance connection services for which the increases in charges are requested in this advice letter. Customers can obtain these services from other providers as well. Appliance connections and gas log installations are services which customers can obtain from other competitive sources, if they so desire. SoCalGas is not the monopoly provider of these services. The current and proposed tariffs state that "The Utility shall advise the customer that appliance services are also provided by plumbers and contractors."

General Order (GO) 96-B does not allow utilities to seek approval for rate increases by advice letter except when that method has been specifically authorized by the Commission or statute. Resolution G-2972, which initially approved the fees for certain appliance connection services and set-timed appointments, authorized SoCalGas to seek subsequent rate changes related to these services by advice letter.

D. 01-11-068 did not provide for SoCalGas to use the advice letter process to seek approval for rate increases for Seismic Valve service. D.01-11-068 approved charges for certain seismic valve services, but the decision makes no mention of the method by which SoCalGas should seek subsequent changes in the fees for these services. A request to increase the rates for seismic valve services should be addressed in an application or in its next General Rate Case proceeding. Therefore, the request to increase fees for seismic valve services is denied.

SoCalGas' proposal to eliminate the option to pay for appliance connection services and seismic valve services at the time of service is reasonable. Adopting this proposal will lessen exposure of utility employees to crimes and allow SoCalGas to maintain separation of adequate system of business controls and separation of duties for its employees. Segregation of duties in connection with customer billings includes the provisions that "no one person serves the customer, prepares the billing, collects the customer payment and records the payment in the accounting system."

Resolution G-2972 also stated in the discussion:

"1. There could be several problems with the proposal by SoCal to collect on the site for these services. Cash transactions may pose a problem by making field representatives more vulnerable to crimes."

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SoCalGas proposes to make payment due dates consistent with Rule 9.C.1 for customers billed on their regular gas service bill. This aspect of the SoCalGas proposal is reasonable.

This will essentially give all customers a convenient payment option for appliance connection services. (Customers already have the option to include payment for seismic valve services on the bill for regular gas service.) Under this option, residential customers must pay their bill within 34 days, if billed on the monthly bill for gas service. The billing time allowed for other customer classes will be the same as that allowed in Rule 9.C.1, which varies from five to as little as nineteen days, depending on the bill frequency

SoCalGas should maintain the billing due date at 30 days for customers choosing separate billing. The proposed revision to require payment in 20 days instead of the current 30 days when billing is done separately from the monthly gas bill is denied.

If customers choose to be billed separately, SoCalGas proposes to reduce the bill due date from 30 to 20 days. Generally, the customers who opt for separate billing do not receive a monthly bill from SoCalGas because they receive gas service through a master meter (i.e. apartment complex or mobile home park). These customers are not subject to the threat of having their gas service terminated. SoCalGas' sole justification for the changes in language related to billing due dates is that it "aligns billing for all customers utilizing these service offerings." It is unclear how the reduction in due date when billed separately helps to align customers' obligations any more than when the due date was within 30 days for all customers, particularly since Rule 9.C.1 allows residential customers to pay their normal monthly bill within 34 days. SoCalGas should maintain the billing due date at 30 days for separate billing.

We deny SoCalGas' proposal to revise existing tariff language to enable it to terminate service for failure to timely pay for the seismic valve service.

The current tariffs have language that does not allow SoCalGas to terminate gas service for failure to pay for seismic valve adjustment charges. We will not adopt SoCalGas' proposal to delete language that currently does not allow SoCalGas to terminate gas service for failure to pay for any seismic valve services rendered pursuant to Rule 10. To minimize the risk of non-payment for these services, we direct SoCalGas to inform the customer requesting service what its charges are for these services before service is provided. Additionally, SoCalGas must ensure that, in accordance with its current and proposed tariff, its staff advises the customer requesting the appliance connection service that these services can be obtained from other contractors and plumbers. Customers should be encouraged to compare the utility's cost of providing this service with other providers before making the final decision to have the utility provide the service. In case of non-payment for the appliance connection and seismic valve services, SoCalGas is free to pursue collection procedures and remedies provided by common law. Termination of gas service is not warranted as an appropriate remedy to force payment for the seismic valve service or the appliance connection service which are the subject of this advice latter.

There are several reasons why we are taking this approach. First, if a private business performed the appliance connection service, and payment was not made in a timely fashion, the customer's gas utility service would not be terminated. Second, a customer's utility gas service is extremely important, and should only be terminated for nonpayment of the utility-provided gas service. When a customer does not timely pay for appliance connection or seismic valve services, this should not also result in the termination of the much more important natural gas service. Third, SoCalGas has included the language (which it wants to now delete) in its tariff for many years, and has not now provided any significant reason why a change is necessary.

In order to avoid the subsidization of the costs for appliance connections and seismic valve services by ratepayers in general, we believe that SoCalGas should include in its fees for these services an uncollectibles charge. In response to an Energy Division data request, SoCalGas indicated that uncollectibles costs are not included in the appliance connection or seismic valve service fees. Including these costs would make SoCalGas'

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fees for these services more similar to the fees a private business would have to charge, in order to cover the costs for late or lack of payment. SoCalGas should include its uncollectibles charge in the fees it proposes for appliance connections in the supplemental advice letter which we order in this resolution.

Tariff Changes

With the changes approved here to Rule 10 by this resolution, the tariff will now read:

Rule No. 10, E.:

"1. General. The Utility, for a charge, shall connect and/or install residential ~~free-standing~~ gas appliances (such as gas ranges, dryers, ~~and~~ barbecues and gas logs) for customers ~~with existing accounts~~, provided all of the following conditions can be met:"

Rule No. 10, E.2:

Charges for connection of additional appliances will be limited to parts and materials. ~~Where a customer is turning on new residential service, the Utility will connect the gas range, dryer and barbecue at no charge when parts are not needed. The Utility will not connect gas ranges, dryers and barbecues that would normally be installed by the builder or contractor.~~

Rule No. 10, F:

~~All charges~~ Customers may elect to pay for the Set-Timed Appointment and Appliance Connection Charge (s) will be included in the bill for gas at the time service, whenever possible. ~~The charge (s) will be due and payable consistent with Rule No. 9, C.1. is rendered or by separate billing.~~ If billed separately, payment is due within 30 days.

Rule No. 10, G.5:

All charges for services rendered pursuant to this section will be included in the bill for gas service, whenever possible. The charge (s) will be due and payable consistent with Rule No. 9, C.1. If billed separately, payment is due within 30 days. ~~Installation payments may be agreed to by the Utility and customer, if requested.~~ will be due on completion of the service provided, unless other options, such as installment payments, are agreed to by the Utility and the customer. The Utility may bill for services rendered pursuant to this Section in its bill for gas service, but will not terminate gas service for failure to pay for any services rendered pursuant to this section.

Current and Proposed Rates

The table below shows current and proposed rates for Appliance Connection:

Service Program	Current Rate	Proposed Rate
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Connection of residential gas appliance such as range, dryer or gas barbecue	\$38.00	\$82.00
Installation of a residential gas appliance such as gas logs - parts not included	n/a	\$122.00
Added cost of valve	\$5.00	\$16.00
Added cost of connector	\$11.00	\$18.00
Added cost of 3/8" gas barbecue kit, including connector, hose & fittings.	\$68.00	\$73.00
Added cost of Appliance Regulator	n/a	\$19.00
Added cost of 1/2" IPT Ball Valve (BBQ)	n/a	\$13.00
Added cost of 3/8" Barbeque Quick Disconnect	n/a	\$37.00
Added cost of 1/2" Barbeque Quick Disconnect	n/a	\$68.00
Added cost of 3/8" Barbeque Hose	n/a	\$28.00
Added cost of 1/2" Barbeque Hose	n/a	\$51.00
Added cost Dryer Vent duct	n/a	\$14.00
Added cost Dryer /Vent Clamps	n/a	\$4.00

In addition, the applicable Retail Sales Tax will be applied to all parts costs.

COMMENTS

Public Utilities Code section 311(g) (1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g) (2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments. No comments were filed.

FINDINGS

1. SoCalGas submitted AL 3995 to revise its service charges for seismic valve services and gas appliance connection services, and revise tariff language related to bill payment for these services.
2. The charges for appliance connections have not been changed since 1991.
3. SoCalGas' proposed increases for these charges will compensate for increases in labor, gasoline, administrative costs, modifications of manufacturers' standards and technology advances.
4. SoCalGas' proposed fees for appliance connection services and pieces of equipment needed for appliance connections reflect actual costs and are reasonable.
5. Resolution G-2972 authorized SoCalGas to seek approval for increases in appliance connection fees and set-timed appointment by advice letter.
6. D.01-11-068, which authorized the fees for seismic valve services, did not provide SoCalGas with the authorization to seek approval for increases in seismic valve services by advice letter.

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7. General Order 96-B does not allow utilities to seek approval for rate increases by advice letter except when authorized by Commission order or statute.
8. SoCalGas' request for approval of an increase in the fees for seismic valve service should be made in an application or General Rate Case proceeding.
9. SoCalGas' proposal to eliminate the option to pay for appliance connection services or seismic valve services at the time of service is reasonable. Doing so makes SoCalGas employees less vulnerable to crimes, and allows SoCalGas to better segregate employee duties.
10. Allowing customers the option to make payment on their monthly gas bill for appliance connection services is reasonable, as it provides a convenient payment option with tariffed bill payment due dates.
11. SoCalGas' proposal to reduce the payment due dates for separate billing from 30 days to 20 days should be denied. SoCalGas has not adequately justified the reduction.
12. SoCalGas should not remove language from Section 10.G.5 from Rule 10 that prevents termination of gas service for failure to pay for services rendered for appliance connections and seismic valve services.
13. SoCalGas should include the cost of uncollectibles as part of its fees for appliance connections and seismic valve services.
14. SoCalGas should include the cost of uncollectibles in the appliance connection fee set forth in the supplemental advice letter ordered in this resolution.

THEREFORE IT IS ORDERED THAT:

1. Southern California Gas Company (SoCalGas)'s proposals to increase the fees for appliance connection services and add new charges for pieces of equipment needed in providing such services are approved.
2. SoCalGas' proposal to increase the fees for seismic valve services in Advice Letter 3995 is denied.
3. SoCalGas' proposal to eliminate the payment option for appliance connection services and seismic valve services at the time that service is completed is approved.
4. SoCalGas' proposal to add the customer option of being billed for appliance connection services on the bill for gas service is approved.
5. SoCalGas' proposal to have payment due dates under the gas service bill payment option be in conformance with Rule 9.C.1 is approved.
6. SoCalGas proposal to reduce the due date for the separate billing option from 30 days to 20 days is denied.
7. SoCalGas' proposal to eliminate language from Rule 10 that prevents termination of gas service for failure to pay for services rendered for appliance connections and seismic valve services is denied.
8. SoCalGas shall include the cost of uncollectibles in the appliance connection fee set forth in the supplemental advice letter ordered in this resolution.
9. SoCalGas shall submit a supplemental advice letter with revised tariff pages that are in compliance with this resolution within 10 days of its effective date.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 21, 2010, the following Commissioners voting favorably thereon:

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/s/ Paul Clanon

Paul Clanon
Executive Director

MICHAEL R. PEEVEY
PRESIDENT
DIAN M. GRUENEICH
JOHN A. BOHN
TIMOTHY ALAN SIMON
Commissioners

Decision (D.) 01-11-068

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Mailed 12/4/01

Decision 01-11-068 November 29, 2001

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of Southern California Gas Company for Authority to Discontinue New Installations of Earthquake Valves on Its Facilities, and to Recover the Costs of Inspecting Earthquake Valves Already Installed. (U 904 G)

Application 00-07-040
(Filed July 24, 2000)

Glen J. Sullivan and Dale Bailey, Attorneys at Law, for Southern California Gas Company, applicant.
Mark Joseph, Attorney at Law, for Coalition of California Utility Employees; Patrick J. Power, Attorney at Law, for Smart Safety Systems; and Les Saffil, for SSP Wrench-Free Gas Shut-Off Valve Company, Little Firefighter Gas Safety Products, and Plumbing-Heating- and Cooling Contractors of California; interested parties.

OPINION

1. Summary

The Commission grants Southern California Gas Company (Applicant) authority to discontinue installations (whether by itself or by others) of automatic earthquake gas shut-off valves (EQVs) on its side of the meter. We also authorize Applicant to raise or establish certain rates and charges related to existing EQVs. Although Applicant may continue its inspections of existing EQVs not previously inspected, we do not authorize it to recover its inspection costs from core customers.

2. Background

In 1995, we authorized Applicant to offer a pilot program for installation of EQVs. In Decision (D.) 96-09-044, we closed the pilot program to new customers and approved Applicant's request to allow contractors to install EQVs on its side of the meter. We did not require Applicant to inspect installations by qualified contractors. In D.98-08-032, the Commission approved Applicant's proposal to institute inspections and charge a fee to contractors for the inspections on an interim basis. The percentage of installations inspected would depend on the record of the individual contractor.

In D.00-06-038, the Commission ordered Applicant to comply with all applicable state and federal codes and regulations when contractors install EQVs on its facilities. The decision also directed Applicant to inform the Commission of its schedule and method for inspecting contractor installations not previously inspected if it believes that it would be good utility practice to do so. Applicant was allowed to request recovery of resulting costs.

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On July 24, 2000, Applicant filed this application to discontinue installation of EQVs on its side of the meter, as described more fully below.

3. Procedural History

On August 25, 2000, a protest was filed by SSP Wrench-Free Gas Shut-Off Valve Company, Little Firefighter Gas Safety Products, and Plumbing-Heating- and Cooling Contractors of California (Joint Protestants). On August 28, 2000, a protest was filed by Smart Safety Systems (SSS).

By Resolution ALJ 176-3044, dated August 3, 2000, the Commission preliminarily categorized this application as a ratesetting proceeding that was not expected to go to hearing. A prehearing conference was held on October 26, 2000. At the prehearing conference, Administrative Law Judge (ALJ) Jeffrey P. O'Donnell asked the Applicant to put into the record information relating to, among other things, safety issues. Exhibit SCG-2 responds to the ALJ's request. Assigned Commissioner Carl Wood's November 7, 2000 scoping ruling confirmed the category, determined that hearings were needed, defined the issues, established a schedule and designated ALJ O'Donnell as the principal hearing officer. Evidentiary hearings here held on February 20, 2001. The matter was submitted on May 3, 2001.

4. The Application

Applicant requests authority to do the following:

- Discontinue permission for any new installations of EQVs on its side of the meter, including installations by Applicant or contractors working for Applicant.
- Recover in rates the actual costs of inspecting and repairing those EQVs already installed by authorized independent contractors on Applicant's side of the meter that Applicant has not previously inspected. The costs would be recovered from core customers.
- Set the charge for removal of EQVs on Applicant's pipelines at \$83.28 plus materials for the first hour and \$13.87 for every quarter hour thereafter, and eliminate the current transaction fee of \$9.00.
- Set the charge for estimating the cost of removal of EQVs on Applicant's pipelines at \$34.89, if removal is not authorized at the time of the estimate.
- Set the charge at \$34.89 for any trip made to a customer's location for any reason due to the customer's, and not Applicant's, circumstances where removal of an EQV on Applicant's pipeline is not performed.
- Set the charge for restoration of gas service after an EQV shuts off gas for any reason at \$63.39.

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Applicant requests that it be authorized to modify its EQV program in the following manner if the Commission denies its request to discontinue it:

- EQV installations on Applicant's side of the meter would be allowed only for customers who are mandated to have EQVs by law.
- Installations would be done only by Applicant's personnel or, at its discretion, a contractor under contract with Applicant.
- Applicant would restrict the number of EQV manufacturers to a few approved by Applicant and, most likely, under contract with Applicant.
- Applicant would treat EQVs in the same manner as excess flow valves. Only Applicant would be allowed to install, maintain and replace EQVs. The customer would pay all costs for installation, maintenance and/or replacement when those costs are incurred.

5. Discontinuance of EQV Installations

Applicant initiated installation of EQVs on its side of the meter because it believed that such installations might prove to be less expensive than installations on the customer's side of the meter. Applicant now believes that it is not less expensive to do so. Applicant states the following reasons:

- D.00-06-038 placed responsibility on Applicant for compliance with all applicable state and federal codes and regulations when contractors install EQVs on Applicant's facilities.
- New safety regulations effective in 2002.
- Costs to remove and install EQVs have increased since they were first authorized in 1996.
- D.00-06-038 placed responsibility on Applicant for ongoing inspection and maintenance of EQVs installed on its side of the meter.
- The United States Department of Transportation adopted a new Operator Qualification Rule effective October 28, 2002. The effect of the rule is that Applicant's costs will increase because personnel working with EQVs on its facilities will have to have additional training.

Applicant is not willing to assume the increased risk resulting from its responsibility for compliance with all applicable state and federal codes and regulations when contractors install EQVs on its

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facilities. Applicant states that it is not compensated for the increased risk. Applicant also points out that no other California gas utilities allow installation of EQVs on their pipelines.

Joint Protestants (other than SSS) state that Applicant should not be allowed to discontinue new installations of EQVs on its side of the meter because EQV installation is required in some areas and may be required statewide in the future. In addition, installation on the customer's side of the meter would be more expensive. SSS, however, does not oppose discontinuance.

We conclude that the application should be granted in this respect. Applicant began its EQV program of its own volition. The program was intended to pay for itself. No ratepayers other than program participants were to have borne the cost of the program. We have not required other utilities subject to our jurisdiction to have such a program. Although, as some of the protests note, EQV installation is required in some areas, there is no requirement that EQVs be installed on the utility's side of the meter. Whether the program continues or not, ratepayers will still have the ability to install EQVs. The installation costs will depend on engineering considerations, and may be site specific. As a result, we see no reason to require Applicant to allow additional installations of EQVs on its side of the meter. Therefore, Applicant will be authorized to discontinue allowing new installations on its side of the meter.

6. Recovery of Inspection Costs

Applicant states that, due to the fact that D.00-06-038 placed responsibility on it for compliance with all applicable state and federal codes and regulations when contractors install EQVs on its facilities, it must inspect all installations not previously inspected. This will result in approximately 52,000 inspections at a cost estimated not to exceed \$400,000.

Applicant has begun its inspection program. As of December 17, 2000, it had performed 9,600 inspections. The inspections revealed 308 (3.2%) minor leaks and 87 (0.9%) cathodic protection deficiencies. The majority of the minor leaks and deficiencies occurred on EQVs installed prior to implementation of new standards that took effect on October 1, 1998. Applicant states that none of these minor leaks or deficiencies constitutes a serious safety issue or presents an immediate safety hazard. Applicant expects the results of the remaining inspections to be similar.

The customers and contractors who participated in the program chose to do so based on the rules and charges in effect at the time. Therefore, Applicant believes that charging the inspection costs to current participants would be unfair. Instead, Applicant proposes to recover the costs from all core customers. It says that the cost to individual core customers would be miniscule. Applicant states that there is a rationale for allocating the costs to all core customers because the inspections may avoid a mishap that could affect members of the public in the vicinity of a customer with a faulty EQV installation. None of the protestants addressed the inspection cost issue.

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We will deny the application with respect to recovery of inspection costs. Applicant has not demonstrated that the costs of further inspections are properly recoverable from core customers.

This is a program that was to be paid for by the participants who benefited from it. However, Applicant believes that charging the further inspection costs to participants would be unfair. Program participants decided to participate based on the costs specified at the time. If the additional inspection costs were to be charged to participants, Applicant would be changing the terms of the program after the fact. Had the participants known of the additional costs at the time, they may have chosen not to participate in the program. Therefore, we agree that to impose additional costs now would be unfair. However, this does not justify recovery of those costs from core customers.

If it would be unfair for program participants who benefited from the program to pay for the additional inspections, it would be much less fair to require ratepayers who did not benefit from the program to pay for them. While the Applicant must take all steps necessary to ensure the continued safe operation of these installations, it must rely on existing program revenues for this purpose.

7. The Proposed Charges

The existing charges were established in 1996. Applicant represents that its proposed charges are cost based. The proposed increases are due to increased pay scales and higher administrative costs. In some cases, more skilled personnel are needed to do the job, and/or increased time is needed.

The existing charge for EQV removal is a fixed charge of \$47.50 plus a transaction charge of \$9.00. Applicant proposes to charge \$83.28 plus materials for the first hour and \$13.87 for every quarter hour thereafter, and to eliminate the transaction charge.

The current "trip charge" for estimating the cost of removal of EQVs on Applicant's pipelines is \$32.50. Applicant proposes to charge \$34.89, if removal is not authorized at the time of the estimate. Applicant proposes to use the same \$34.89 charge for any trip made to a customer's location for any reason due to the customer's, and not Applicant's, circumstances where removal of an EQV on Applicant's pipeline is not performed.

The existing charge for restoration of gas service after an EQV shuts off gas for any reason is \$50.00. Applicant proposes to charge \$63.39.

We will approve Applicant's proposed charges, which are not opposed by the other parties, and are supported by a detailed cost analysis.

8. SSS Proposal

SSS proposes that Applicant's meter and the by-pass tee be made available for purchase by the customer. The meter and tee would then be leased back to Applicant. The purpose of this proposal is to facilitate installation of SSS's EQV.

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SSS's EQV is designed to be installed between the meter and the tee. Under its proposal, the installation would be on the customer's facilities. SSS's EQV utilizes the meter coupling to simplify installation, and the tee to avoid having to shutoff the customer's gas during installation. The result is a significant installation cost savings. SSS also represents that its proposal would mitigate Applicant's market power.

SSS states that its EQV is only in prototype form. It has not found a manufacturer at this time. SSS has not determined what its proposed purchase and lease-back program would cost Applicant to implement.

Applicant opposes SSS's proposal. Applicant argues that SSS's valve is still being designed, is still pending grant of patents, may never be financed, may never find a manufacturer, has never been installed on a gas service, and has not been certified to meet industry and government standards. Applicant states that it is not apparent that its customers will benefit from allowing SSS to install its valves on Applicant's facilities.

We do not believe that it would be appropriate to require Applicant to set up a program to benefit a specific EQV. Even if we were to consider SSS's proposal, it is premature and lacks sufficient information to be considered. We will not adopt it.

9. Applicant's Responsibility for Operation of EQVs

Applicant states that the Commission found in D.96-09-044 and D.00-06-038 that it is not responsible for the operation of customer-owned EQVs installed on its facilities, including leaks from the EQV itself. Applicant asks that the Commission again make that finding.

In D.96-09-044, the Commission approved Applicant's proposed tariff language regarding its EQV program. If there is something in Applicant's tariffs that is unclear, Applicant should propose a change in its tariffs. It has not done so here.

In D.00-06-038, the Commission found that Applicant bears the duty of ensuring the safety of its pipelines, including the portions that have EQVs installed on them. Therefore, Applicant must comply with all applicable state and federal codes and regulations as well as the Commission's decisions. The applicable state and federal codes and regulations speak for themselves.

D.00-06-038 states that Applicant is responsible for the safety of its pipelines. The decision does not explicitly state that Applicant is responsible for the proper operation of the EQV in the event of an earthquake or for leaks in the EQV itself. In Ordering Paragraph 4 of D.00-06-038, the Commission stated: "SCG shall also state its position on how failures of the EQV device that it discovers during routine inspection at the meter are addressed with the EQV-owning customer and timely corrected by that customer." This is a requirement to provide information, nothing more.

Determination of whether Applicant is responsible for the proper operation of EQVs in the event of an earthquake or for leaks in the EQV itself would require, as a minimum, examination and interpretation of all of the applicable pipeline safety rules, regulations and codes, Applicant's tariffs for the

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EQV program, and Applicant's agreements, commitments and contracts related to the program. Applicant has made no showing in this proceeding that would allow us to make such a determination, even if we were to engage in such an advisory process. Therefore, we will not modify or further discuss our findings in D.96-09-044 and D.00-06-038.

10. Comments on Proposed Decision

On November 19, 2001, the alternate decision in this proceeding of Commissioner Wood was filed with the Commission and served on the parties in accordance with Section 311(d) of the Public Utilities Code and Rule 77.1 of the Commission's Rules of Practice and Procedure. Comments were filed by Smart Safety Systems.

Findings of Fact

1. A notice of the filing of the application appeared in the Daily Calendar on July 28, 2000.
2. Applicant began its EQV program of its own volition.
3. While EQV installation is required in some areas, there is no requirement that EQVs be installed on the utility's side of the meter.
4. Other utilities subject to our jurisdiction are not required to allow installation of EQVs on their facilities.
5. Applicant's proposed charges are reasonable.
6. Applicant's EQV program is supposed to be paid for by the participants who benefited from it.
7. No ratepayers, other than program participants, have directly benefited from the program.
8. EQVs installed on Applicant's side of the meter are installed downstream of the pressure regulator, and operate at the same pressure as the customer's facilities.
9. Serious gas leaks can easily be detected by smelling the odorant present in the gas, and would be quickly reported by the EQV customer or Applicant's meter readers performing routine safety checks while reading the meter.
10. The inspections by Applicant of EQV installations not previously inspected have revealed no serious safety issues or immediate safety hazards, and Applicant does not expect any to be found.
11. Charging the inspection costs to EQV program participants would be unfair.
12. Charging the inspection costs to core customers would be unfair.
13. Applicant has made no showing in this proceeding that would allow the Commission to determine whether Applicant is responsible for the proper operation of EQVs installed on its side of the meter in the event of an earthquake or for leaks in the EQV itself.

Conclusions of Law

1. Applicant's request to discontinue installation of EQVs on its side of the meter should be approved.
2. Applicant's proposed charges should be authorized.

Southern California Gas Company
Test Year 2012 GRC - REVISED
Non-Shared Service Workpapers

A.00-07-040 COM/CXW/mnt

3. Core customers should not be required to pay for the costs of inspecting EQVs not previously inspected.

4. Applicant's request to recover from core customers the costs of inspecting EQVs not previously inspected should be denied.

5. This decision should be made effective immediately to enable Applicant to discontinue EQV installations on its side of the meter and to implement the proposed charges without delay.

O R D E R

IT IS ORDERED that:

1. The request of Southern California Gas Company (Applicant) to discontinue installation of automatic earthquake gas shut-off valves (EQVs) on its side of the meter is granted.

2. Applicant's request to recover from core customers the costs of inspecting EQVs not previously inspected is denied.

3. Applicant may continue its inspections of existing EQVs not previously inspected.

4. Applicant's proposed charges are authorized.

5. Except as specifically provided for herein, the application is denied.

6. This application is closed.

This order is effective today.

Dated November 29, 2001, at San Francisco, California.

LORETTA M. LYNCH
President
HENRY M. DUQUE
RICHARD A. BILAS
CARL W. WOOD
GEOFFREY BROWN
Commissioners

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Summary of Shared Services Workpapers:

Description	In 2009 \$ (000) "Book Expense"			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
<i>A. Customer Service Field</i>	3,619	3,980	3,942	3,942
<i>B. Customer Contact Center</i>	86	91	91	91
<i>C. Meter Reading</i>	820	844	844	844
<i>D. Billed-in from SDG&E</i>	419	514	513	514
<i>Total</i>	4,944	5,429	5,390	5,391

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Cost Center: VARIOUS

Summary for Category: A. Customer Service Field

	In 2009\$ (000) "Book Expense"			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	3,328	3,665	3,633	3,633
Non-Labor	291	315	309	309
NSE	0	0	0	0
Total	3,619	3,980	3,942	3,942
FTE	48.6	51.8	51.2	51.2

Cost Centers belonging to this Category:

2200-0345.000 CUSTOMER SERVICE FIELD TRAINING MANAGER

Labor	1,315	1,443	1,443	1,443
Non-Labor	92	146	146	146
NSE	0	0	0	0
Total	1,407	1,589	1,589	1,589
FTE	17.0	19.0	19.0	19.0

2200-0437.000 CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Labor	112	32	0	0
Non-Labor	21	6	0	0
NSE	0	0	0	0
Total	133	38	0	0
FTE	1.9	0.6	0.0	0.0

2200-0942.000 CS FIELD STAFF MANAGER

Labor	1,339	1,511	1,511	1,511
Non-Labor	115	101	101	101
NSE	0	0	0	0
Total	1,454	1,612	1,612	1,612
FTE	21.1	22.0	22.0	22.0

2200-2145.000 SDGE EASTERN PROJECT MANAGER

Labor	0	0	0	0
Non-Labor	0	0	0	0
NSE	0	0	0	0
Total	0	0	0	0
FTE	1.0	1.0	1.0	1.0

2200-2206.000 QUALITY ASSURANCE

Labor	562	679	679	679
Non-Labor	63	62	62	62
NSE	0	0	0	0
Total	625	741	741	741
FTE	7.6	9.2	9.2	9.2

Beginning of Workpaper
2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Customer Service Field Training Manager
Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Activity Description:

This cost center contains the labor and non-labor costs associated with the management and oversight of field operations training, quality assurance and operations qualification certification activities.

Forecast Methodology:

Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

Non-Labor - 5-YR Average

The five-year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

NSE - 5-YR Average

NSE is not applicable to this cost center.

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Customer Service Field Training Manager
Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		1,137	1,222	1,381	1,299	1,346	1,474	1,474	1,474
Non-Labor		291	160	99	107	94	149	149	149
NSE		0	0	0	0	0	0	0	0
Total		1,428	1,382	1,480	1,406	1,440	1,623	1,623	1,623
FTE		14.8	15.6	18.1	17.0	17.0	19.0	19.0	19.0
		Allocations Out							
Labor		20	21	19	33	31	31	31	31
Non-Labor		6	3	1	3	2	3	3	3
NSE		0	0	0	0	0	0	0	0
Total		26	24	20	36	33	34	34	34
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		1,117	1,201	1,362	1,266	1,315	1,443	1,443	1,443
Non-Labor		285	157	98	104	92	146	146	146
NSE		0	0	0	0	0	0	0	0
Total		1,402	1,358	1,460	1,370	1,407	1,589	1,589	1,589
FTE		14.8	15.6	18.1	17.0	17.0	19.0	19.0	19.0
		Allocations In							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		1,117	1,201	1,362	1,266	1,315	1,443	1,443	1,443
Non-Labor		285	157	98	104	92	146	146	146
NSE		0	0	0	0	0	0	0	0
Total		1,402	1,358	1,460	1,370	1,407	1,589	1,589	1,589
FTE		14.8	15.6	18.1	17.0	17.0	19.0	19.0	19.0

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Customer Service Field Training Manager
 Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	12	2	0	14	0.10	3	1	0	4	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	1,334	92	0	1,426	16.90	1,471	148	0	1,619	19.00
% Allocation										
Retained	97.66%	97.67%				97.87%	97.87%			
SEU	2.34%	2.33%				2.13%	2.13%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	1,303	90	0	1,393		1,440	145	0	1,585	
SEU	31	2	0	33		31	3	0	34	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,346	94	0	1,440	17.00	1,474	149	0	1,623	19.00
Total Alloc. Out	31	2	0	33		31	3	0	34	
Total Retained	1,315	92	0	1,407		1,443	146	0	1,589	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	1,315	92	0	1,407		1,443	146	0	1,589	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	3	1	0	4	0.00	3	1	0	4	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	1,471	148	0	1,619	19.00	1,471	148	0	1,619	19.00
% Allocation										
Retained	97.87%	97.87%				97.87%	97.87%			
SEU	2.13%	2.13%				2.13%	2.13%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	1,440	145	0	1,585		1,440	145	0	1,585	
SEU	31	3	0	34		31	3	0	34	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,474	149	0	1,623	19.00	1,474	149	0	1,623	19.00
Total Alloc. Out	31	3	0	34		31	3	0	34	
Total Retained	1,443	146	0	1,589		1,443	146	0	1,589	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	1,443	146	0	1,589		1,443	146	0	1,589	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Customer Service Field Training Manager
Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

The allocation is based on the Customer Service Training Manager's estimate of the time he devotes to overseeing the operations at SDG&E and his assessment of the time the Administrative Associate spends supporting the organization. The labor and non-labor methodologies are the same. The assessment of the charging activities determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2010

The allocation is based on the Customer Service Training Manager's estimate of the time he devotes to overseeing the operations at SDG&E. The labor and non-labor methodologies are the same. The assessment of the charging activities determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2011

The allocation is based on the Customer Service Training Manager's estimate of the time he devotes to overseeing the operations at SDG&E. The labor and non-labor methodologies are the same. The assessment of the charging activities determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2012

The allocation is based on the Customer Service Training Manager's estimate of the time he devotes to overseeing the operations at SDG&E. The labor and non-labor methodologies are the same. The assessment of the charging activities determined that the non-labor charges are driven by how labor is allocated.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Customer Service Field Training Manager
 Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	5-YR Average	1,276	1,276	1,276	198	198	198	1,474	1,474	1,474
Non-Labor	5-YR Average	149	149	149	0	0	0	149	149	149
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		1,425	1,425	1,425	198	198	198	1,623	1,623	1,623
FTE	5-YR Average	16.5	16.5	16.5	2.5	2.5	2.5	19.0	19.0	19.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	198	0	0	198	0.0	1-Sided Adj

Adjustment to five-year average forecast in order to align customer service training labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J.USS Cost Centers - Incremental Forecast" for analysis.

2010	0	0	0	0	2.5	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field training FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J. USS Cost Centers - Incremental Forecast" for analysis.

2010 Total	198	0	0	198	2.5	
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2011	198	0	0	198	0.0	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field training labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J. USS Cost Centers - Incremental Forecast" for analysis.

2011	0	0	0	0	2.5	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field training FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J. USS Cost Centers - Incremental Forecast" for analysis.

2011 Total	198	0	0	198	2.5	
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Customer Service Field Training Manager
 Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	198	0	0	198	0.0	1-Sided Adj

Adjustment to five-year average forecast in order to align customer service field training labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J. USS Cost Centers - Incremental Forecast" for analysis.

2012	0	0	0	0	2.5	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field training FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "SCG Customer Service Field J. USS Cost Centers - Incremental Forecast" for analysis.

2012 Total	198	0	0	198	2.5	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 1. Customer Service Field Training Manager
Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	864	952	1,113	1,073	1,140
Non-Labor	258	147	94	106	94
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,122	1,098	1,207	1,179	1,234
FTE	12.5	13.2	15.3	14.2	14.3
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	864	952	1,113	1,073	1,140
Non-Labor	258	147	94	106	94
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,122	1,098	1,207	1,179	1,234
FTE	12.5	13.2	15.3	14.2	14.3
Vacation & Sick (Nominal \$)					
Labor	147	170	194	207	206
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	147	170	194	207	206
FTE	2.3	2.4	2.8	2.8	2.7
Escalation to 2009\$					
Labor	126	100	73	19	0
Non-Labor	32	13	5	2	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	158	113	79	21	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	1,137	1,222	1,381	1,299	1,346
Non-Labor	290	160	99	108	94
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,427	1,381	1,480	1,406	1,440
FTE	14.8	15.6	18.1	17.0	17.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 1. Customer Service Field Training Manager
 Cost Center: 2200-0345.000 - CUSTOMER SERVICE FIELD TRAINING MANAGER

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Beginning of Workpaper
2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Customer Service South Inland Director
Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Activity Description:

This cost center contains the historical costs associated with the management and support for Customer Service South Inland (SDG&E & SCG) and includes the Director and Director's assistant. As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010. There is no forecast for Test Year 2012.

Forecast Methodology:

Labor - Zero-Based

As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010. There is no forecast for Test Year 2012.

Non-Labor - Zero-Based

As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010. There is no forecast for Test Year 2012.

NSE - Zero-Based

As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010. There is no forecast for Test Year 2012.

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Customer Service South Inland Director
Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		55	213	212	192	217	63	0	0
Non-Labor		66	38	24	30	39	12	0	0
NSE		0	0	0	0	0	0	0	0
Total		121	251	236	222	256	75	0	0
FTE		0.4	2.2	2.1	1.7	1.9	0.6	0.0	0.0
		Allocations Out							
Labor		25	97	97	88	105	31	0	0
Non-Labor		21	17	11	14	18	6	0	0
NSE		0	0	0	0	0	0	0	0
Total		46	114	108	102	123	37	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		30	116	115	104	112	32	0	0
Non-Labor		45	21	13	16	21	6	0	0
NSE		0	0	0	0	0	0	0	0
Total		75	137	128	120	133	38	0	0
FTE		0.4	2.2	2.1	1.7	1.9	0.6	0.0	0.0
		Allocations In							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		30	116	115	104	112	32	0	0
Non-Labor		45	21	13	16	21	6	0	0
NSE		0	0	0	0	0	0	0	0
Total		75	137	128	120	133	38	0	0
FTE		0.4	2.2	2.1	1.7	1.9	0.6	0.0	0.0

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Customer Service South Inland Director
 Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	2	3	0	5	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	215	36	0	251	1.90	63	12	0	75	0.60
% Allocation										
Retained	51.33%	51.34%				50.55%	50.55%			
SEU	48.67%	48.66%				49.45%	49.45%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	110	18	0	128		32	6	0	38	
SEU	105	18	0	123		31	6	0	37	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	217	39	0	256	1.90	63	12	0	75	0.60
Total Alloc. Out	105	18	0	123		31	6	0	37	
Total Retained	112	21	0	133		32	6	0	38	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	112	21	0	133		32	6	0	38	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	0	0	0	0	0.00	0	0	0	0	0.00
% Allocation										
Retained	100.00%	100.00%				100.00%	100.00%			
SEU	0.00%	0.00%				0.00%	0.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	0	0	0	0		0	0	0	0	
SEU	0	0	0	0		0	0	0	0	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	0	0	0	0	0.00	0	0	0	0	0.00
Total Retained	0	0	0	0		0	0	0	0	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	0	0	0	0		0	0	0	0	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Customer Service South Inland Director
Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

Shared services percentages are based on estimated labor hours or FTEs for South Inland SCG and SDG&E. This method supports the shared management labor for the Director and Administrative Assistant. Labor and non-labor percentages are the same. Non-labor in this cost center is in support of the shared management functions of the FTEs in this cost center and follows the same allocation as labor.

Cost Center Allocation Percentage for 2010

Shared services percentages are based on estimated labor hours or FTEs for South Inland SCG and SDG&E. This method supports the shared management labor for the Director and Administrative Assistant. Labor and non-labor percentages are the same. Non-labor in this cost center is in support of the shared management functions of the FTEs in this cost center and follows the same allocation as labor.

Cost Center Allocation Percentage for 2011

As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010.

Cost Center Allocation Percentage for 2012

As a result of the recent reorganization efforts, this cost center was eliminated in second quarter 2010.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Customer Service South Inland Director
 Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	Zero-Based	0	0	0	63	0	0	63	0	0
Non-Labor	Zero-Based	0	0	0	12	0	0	12	0	0
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	75	0	0	75	0	0
FTE	Zero-Based	0.0	0.0	0.0	0.6	0.0	0.0	0.6	0.0	0.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	63	0	0	63	0.0	1-Sided Adj

Reduction of a director and an administrative position effective April 2010, in response to changes in management oversight due to the recent reorganization efforts. As a result, this cost center has been retired. Refer to Supplemental Workpaper 2FO000.000_Supp1.pdf, "I. Customer Service Field Operations USS Cost Centers - Forecast Methodology (100% Incurred Level)".

2010	0	12	0	12	0.0	1-Sided Adj
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Reduction of a director and an administrative position effective April 2010, in response to changes in management oversight due to the recent reorganization efforts. As a result, this cost center has been retired. Refer to Supplemental Workpaper 2FO000.000_Supp1.pdf, "Customer Service Field Operations USS Cost Centers - Forecast Methodology (100% Incurred Level)".

2010	0	0	0	0	0.6	1-Sided Adj
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Reduction of a director and an administrative position effective April 2010, in response to changes in management oversight due to the recent reorganization efforts. Refer to Supplemental Workpaper 2FO000.000_Supp1.pdf, "I. Customer Service Field Operations USS Cost Centers - Forecast Methodology (100% Incurred Level)".

2010 Total	63	12	0	75	0.6	
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2011 Total	0	0	0	0	0.0	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 2. Customer Service South Inland Director
Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012 Total	0	0	0	0	0.0	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Customer Service South Inland Director
 Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	42	166	171	159	184
Non-Labor	59	35	22	29	40
NSE	0	0	0	0	0
Total	101	201	193	188	223
FTE	0.3	1.9	1.8	1.4	1.6
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	42	166	171	159	184
Non-Labor	59	35	22	29	40
NSE	0	0	0	0	0
Total	101	201	193	188	223
FTE	0.3	1.9	1.8	1.4	1.6
Vacation & Sick (Nominal \$)					
Labor	7	30	30	31	33
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	7	30	30	31	33
FTE	0.1	0.3	0.3	0.3	0.3
Escalation to 2009\$					
Labor	6	17	11	3	0
Non-Labor	7	3	1	0	0
NSE	0	0	0	0	0
Total	13	21	13	3	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	55	213	212	192	217
Non-Labor	66	38	24	30	40
NSE	0	0	0	0	0
Total	122	251	236	222	257
FTE	0.4	2.2	2.1	1.7	1.9

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 2. Customer Service South Inland Director
 Cost Center: 2200-0437.000 - CUSTOMER SERVICES SOUTH INLAND DIRECTOR

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Beginning of Workpaper
2200-0942.000 - CS FIELD STAFF MANAGER

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Customer Service Field Staff Manager
Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Activity Description:

This cost center contains the costs associated with the customer service field staff . The activities performed by this group include identifying best practices and opportunities for improvement, developing and implementing new programs, functioning as a center of technical expertise concerning the policies and practices in each area of discipline, project management of large cross functional projects and activities associated with the customer service operations, serving as a subject matter expert in working with Information Technology and outside vendors to maintain and improve customer service field software applications, and designing and implementing new data collections systems and maintaining historic data bases for management and regulatory purposes.

Forecast Methodology:

Labor - 5-YR Average

The five- year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

Non-Labor - 5-YR Average

The five- year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The five-year average avoids the potential for artificially inflating or deflating results based on short term change.

NSE - 5-YR Average

NSE is not applicable to this cost center.

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Customer Service Field Staff Manager
Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Summary of Results:

Years	In 2009\$ (000)								
	Adjusted-Recorded					Adjusted-Forecast			
	2005	2006	2007	2008	2009	2010	2011	2012	
	Total Incurred (100% Level)								
Labor	1,361	1,665	1,832	1,785	1,758	1,830	1,830	1,830	
Non-Labor	155	100	111	104	137	120	120	120	
NSE	0	0	0	0	0	0	0	0	
Total	1,516	1,765	1,943	1,889	1,895	1,950	1,950	1,950	
FTE	16.5	19.7	22.1	21.5	21.1	22.0	22.0	22.0	
	Allocations Out								
Labor	335	439	458	463	419	319	319	319	
Non-Labor	25	27	28	27	22	19	19	19	
NSE	0	0	0	0	0	0	0	0	
Total	360	466	486	490	441	338	338	338	
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Retained								
Labor	1,026	1,226	1,374	1,322	1,339	1,511	1,511	1,511	
Non-Labor	130	73	83	77	115	101	101	101	
NSE	0	0	0	0	0	0	0	0	
Total	1,156	1,299	1,457	1,399	1,454	1,612	1,612	1,612	
FTE	16.5	19.7	22.1	21.5	21.1	22.0	22.0	22.0	
	Allocations In								
Labor	0	0	0	0	0	0	0	0	
Non-Labor	0	0	0	0	0	0	0	0	
NSE	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Book Expense								
Labor	1,026	1,226	1,374	1,322	1,339	1,511	1,511	1,511	
Non-Labor	130	73	83	77	115	101	101	101	
NSE	0	0	0	0	0	0	0	0	
Total	1,156	1,299	1,457	1,399	1,454	1,612	1,612	1,612	
FTE	16.5	19.7	22.1	21.5	21.1	22.0	22.0	22.0	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Customer Service Field Staff Manager
 Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	42	46	0	88	0.60	44	14	0	58	0.70
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	1,716	91	0	1,807	20.50	1,786	106	0	1,892	21.30
% Allocation										
Retained	75.61%	75.60%				82.10%	82.10%			
SEU	24.39%	24.40%				17.90%	17.90%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	1,297	69	0	1,366		1,467	87	0	1,554	
SEU	419	22	0	441		319	19	0	338	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,758	137	0	1,895	21.10	1,830	120	0	1,950	22.00
Total Alloc. Out	419	22	0	441		319	19	0	338	
Total Retained	1,339	115	0	1,454		1,511	101	0	1,612	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	1,339	115	0	1,454		1,511	101	0	1,612	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	44	14	0	58	0.70	44	14	0	58	0.70
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	1,786	106	0	1,892	21.30	1,786	106	0	1,892	21.30
% Allocation										
Retained	82.10%	82.10%				82.10%	82.10%			
SEU	17.90%	17.90%				17.90%	17.90%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	1,467	87	0	1,554		1,467	87	0	1,554	
SEU	319	19	0	338		319	19	0	338	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,830	120	0	1,950	22.00	1,830	120	0	1,950	22.00
Total Alloc. Out	319	19	0	338		319	19	0	338	
Total Retained	1,511	101	0	1,612		1,511	101	0	1,612	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	1,511	101	0	1,612		1,511	101	0	1,612	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Customer Service Field Staff Manager
Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

The shared services allocation percentage is based on the number of FTE's benefitted by the activities performed by the cost center. As Customer Service Field (CSF) Staff supports the CSF activities of both SCG and SDG&E, the same support provided to one is provided to the other, while the actual demands are largely based on the size of each.

Cost Center Allocation Percentage for 2010

The shared services allocation percentage is based on the cost center manager's assessment of the activities and contributions of the individual employees charging the cost center.

Cost Center Allocation Percentage for 2011

The shared services allocation percentage is based on the cost center manager's assessment of the activities and contributions of the individual employees charging the cost center.

Cost Center Allocation Percentage for 2012

The shared services allocation percentage is based on the cost center manager's assessment of the activities and contributions of the individual employees charging the cost center.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Customer Service Field Staff Manager
 Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	5-YR Average	1,680	1,680	1,680	150	150	150	1,830	1,830	1,830
Non-Labor	5-YR Average	120	120	120	0	0	0	120	120	120
NSE	5-YR Average	0	0	0	0	0	0	0	0	0
Total		1,800	1,800	1,800	150	150	150	1,950	1,950	1,950
FTE	5-YR Average	20.2	20.2	20.2	1.8	1.8	1.8	22.0	22.0	22.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	150	0	0	150	0.0	1-Sided Adj

Adjustment to five-year average forecast in order to align customer service field support labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2010	0	0	0	0	1.8	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field support FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2010 Total	150	0	0	150	1.8	
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2011	150	0	0	150	0.0	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field support labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2011	0	0	0	0	1.8	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field support FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2011 Total	150	0	0	150	1.8	
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Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Customer Service Field Staff Manager
 Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	150	0	0	150	0.0	1-Sided Adj

Adjustment to five-year average forecast in order to align customer service field support labor costs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2012	0	0	0	0	1.8	1-Sided Adj
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Adjustment to five-year average forecast in order to align customer service field support FTEs with 2010 staffing levels. See Supplemental Workpaper 2FO000.000_Supp1.pdf, "J. USS Cost Centers - Incremental Forecast".

2012 Total	150	0	0	150	1.8	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 3. Customer Service Field Staff Manager
Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	1,035	1,297	1,476	1,474	1,490
Non-Labor	138	92	105	103	137
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,173	1,389	1,582	1,577	1,627
FTE	14.1	16.6	18.7	18.0	17.7
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	1,035	1,297	1,476	1,474	1,490
Non-Labor	138	92	105	103	137
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,173	1,389	1,582	1,577	1,627
FTE	14.0	16.6	18.7	18.0	17.7
Vacation & Sick (Nominal \$)					
Labor	176	232	258	284	269
Non-Labor	0	0	0	0	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	176	232	258	284	269
FTE	2.5	3.1	3.4	3.5	3.4
Escalation to 2009\$					
Labor	150	136	97	26	0
Non-Labor	17	8	6	2	0
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	168	144	103	28	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	1,361	1,666	1,831	1,784	1,759
Non-Labor	155	100	111	104	137
NSE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	1,517	1,766	1,943	1,889	1,896
FTE	16.5	19.7	22.1	21.5	21.1

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 3. Customer Service Field Staff Manager
 Cost Center: 2200-0942.000 - CS FIELD STAFF MANAGER

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Beginning of Workpaper
2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 4. SDG&E Eastern Project Manager
Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Activity Description:

This cost center contains the labor and non-labor costs associated with the services provided by a SCG manager to San Diego Gas & Electric (SDG&E) field operations. The District Operations Manager (DOM) is a SCG employee with management responsibilities for SDG&E's Eastern and Metro facilities.

Forecast Methodology:

Labor - Base YR Rec

The base year forecast methodology best represents the level of expense that occurs in this cost center. Between 2005 and 2008, these activities were performed by an SDG&E employee and charged to a non-shared SDG&E cost center.

Non-Labor - Base YR Rec

The base year forecast methodology best represents the level of expense that occurs in this cost center. Between 2005 and 2008, these activities were performed by an SDG&E employee and charged to a non-shared SDG&E cost center.

NSE - Base YR Rec

NSE is not applicable to this cost center.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. SDG&E Eastern Project Manager
 Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		61	88	103	-7	94	94	94	94
Non-Labor		6	1	9	0	4	4	4	4
NSE		0	0	0	0	0	0	0	0
Total		67	89	112	-7	98	98	98	98
FTE		0.7	0.9	1.1	-0.1	1.0	1.0	1.0	1.0
		Allocations Out							
Labor		61	88	101	-7	94	94	94	94
Non-Labor		6	1	9	0	4	4	4	4
NSE		0	0	0	0	0	0	0	0
Total		67	89	110	-7	98	98	98	98
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		0	0	2	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	2	0	0	0	0	0
FTE		0.7	0.9	1.1	-0.1	1.0	1.0	1.0	1.0
		Allocations In							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		0	0	2	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	2	0	0	0	0	0
FTE		0.7	0.9	1.1	-0.1	1.0	1.0	1.0	1.0

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. SDG&E Eastern Project Manager
 Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	94	4	0	98	1.00	94	4	0	98	1.00
% Allocation										
Retained	0.00%	0.00%				0.00%	0.00%			
SEU	100.00%	100.00%				100.00%	100.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	0	0	0	0		0	0	0	0	
SEU	94	4	0	98		94	4	0	98	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	94	4	0	98	1.00	94	4	0	98	1.00
Total Alloc. Out	94	4	0	98		94	4	0	98	
Total Retained	0	0	0	0		0	0	0	0	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	0	0	0	0		0	0	0	0	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	94	4	0	98	1.00	94	4	0	98	1.00
% Allocation										
Retained	0.00%	0.00%				0.00%	0.00%			
SEU	100.00%	100.00%				100.00%	100.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	0	0	0	0		0	0	0	0	
SEU	94	4	0	98		94	4	0	98	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	94	4	0	98	1.00	94	4	0	98	1.00
Total Alloc. Out	94	4	0	98		94	4	0	98	
Total Retained	0	0	0	0		0	0	0	0	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	0	0	0	0		0	0	0	0	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 4. SDG&E Eastern Project Manager
Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

The allocation methodology used is based on the FTEs time in this cost center which is 100% in support of SDG&E. The District Operations Manager is a SCG employee and working 100% for SDG&E.

Cost Center Allocation Percentage for 2010

The allocation methodology used is based on the FTEs time in this cost center which is 100% in support of SDG&E. The District Operations Manager is a SCG employee and working 100% for SDG&E.

Cost Center Allocation Percentage for 2011

The allocation methodology used is based on the FTEs time in this cost center which is 100% in support of SDG&E. The District Operations Manager is a SCG employee and working 100% for SDG&E.

Cost Center Allocation Percentage for 2012

The allocation methodology used is based on the FTEs time in this cost center which is 100% in support of SDG&E. The District Operations Manager is a SCG employee and working 100% for SDG&E.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. SDG&E Eastern Project Manager
 Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	Base YR Rec	94	94	94	0	0	0	94	94	94
Non-Labor	Base YR Rec	4	4	4	0	0	0	4	4	4
NSE	Base YR Rec	0	0	0	0	0	0	0	0	0
Total		98	98	98	0	0	0	98	98	98
FTE	Base YR Rec	1.0	1.0	1.0	0.0	0.0	0.0	1.0	1.0	1.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012 Total	0	0	0	0	0.0	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 4. SDG&E Eastern Project Manager
Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	46	68	83	-6	79
Non-Labor	5	1	9	0	4
NSE	0	0	0	0	0
Total	52	69	92	-6	84
FTE	0.6	0.8	0.9	-0.1	0.8
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	46	68	83	-6	79
Non-Labor	5	1	9	0	4
NSE	0	0	0	0	0
Total	52	69	92	-6	84
FTE	0.6	0.8	0.9	-0.1	0.8
Vacation & Sick (Nominal \$)					
Labor	8	12	15	-1	14
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	8	12	15	-1	14
FTE	0.1	0.1	0.2	0.0	0.2
Escalation to 2009\$					
Labor	7	7	5	0	0
Non-Labor	1	0	0	0	0
NSE	0	0	0	0	0
Total	7	7	6	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	61	88	103	-7	94
Non-Labor	6	1	9	0	4
NSE	0	0	0	0	0
Total	67	89	112	-7	98
FTE	0.7	0.9	1.1	-0.1	1.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 4. SDG&E Eastern Project Manager
 Cost Center: 2200-2145.000 - SDGE EASTERN PROJECT MANAGER

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Beginning of Workpaper
2200-2206.000 - QUALITY ASSURANCE

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 5. Quality Assurance
Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Activity Description:

This cost center contains the labor and non-labor costs of SCG employees who oversee, manage and support quality assurance (QA) and operation qualification (OQ) functions for SCG and on behalf of SDG&E.

Forecast Methodology:

Labor - 3-YR Average

The Quality Assurance group was not fully implemented and staffed until mid-year 2006. The three-year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The three-year average avoids the potential for artificially inflating or deflating results based on short term change.

Non-Labor - 3-YR Average

The Quality Assurance group was not fully implemented and staffed until mid-year 2006. The 3 year average forecast methodology best represents the level of change of expense that occurs in this cost center, which remains reasonably static over time. The 3 year average avoids the potential for artificially inflating/deflating results based on short term change.

NSE - 3-YR Average

NSE is not applicable to this cost center.

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 5. Quality Assurance
Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		0	239	748	768	576	697	697	697
Non-Labor		0	50	72	57	64	63	63	63
NSE		0	0	0	0	0	0	0	0
Total		0	289	820	825	640	760	760	760
FTE		0.0	3.0	9.9	10.2	7.6	9.2	9.2	9.2
		Allocations Out							
Labor		0	48	60	31	14	18	18	18
Non-Labor		0	10	5	2	1	1	1	1
NSE		0	0	0	0	0	0	0	0
Total		0	58	65	33	15	19	19	19
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		0	191	688	737	562	679	679	679
Non-Labor		0	40	67	55	63	62	62	62
NSE		0	0	0	0	0	0	0	0
Total		0	231	755	792	625	741	741	741
FTE		0.0	3.0	9.9	10.2	7.6	9.2	9.2	9.2
		Allocations In							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		0	191	688	737	562	679	679	679
Non-Labor		0	40	67	55	63	62	62	62
NSE		0	0	0	0	0	0	0	0
Total		0	231	755	792	625	741	741	741
FTE		0.0	3.0	9.9	10.2	7.6	9.2	9.2	9.2

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 5. Quality Assurance
 Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	4	6	0	10	0.00	4	6	0	10	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	572	58	0	630	7.60	693	57	0	750	9.20
% Allocation										
Retained	97.53%	97.54%				97.47%	97.47%			
SEU	2.47%	2.46%				2.53%	2.53%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	558	57	0	615		675	56	0	731	
SEU	14	1	0	15		18	1	0	19	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	576	64	0	640	7.60	697	63	0	760	9.20
Total Alloc. Out	14	1	0	15		18	1	0	19	
Total Retained	562	63	0	625		679	62	0	741	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	562	63	0	625		679	62	0	741	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	4	6	0	10	0.00	4	6	0	10	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	693	57	0	750	9.20	693	57	0	750	9.20
% Allocation										
Retained	97.47%	97.47%				97.47%	97.47%			
SEU	2.53%	2.53%				2.53%	2.53%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	675	56	0	731		675	56	0	731	
SEU	18	1	0	19		18	1	0	19	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	697	63	0	760	9.20	697	63	0	760	9.20
Total Alloc. Out	18	1	0	19		18	1	0	19	
Total Retained	679	62	0	741		679	62	0	741	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	679	62	0	741		679	62	0	741	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 5. Quality Assurance
Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

The Quality Assurance Team Lead provides guidance and work direction over the quality assurance activities at both SCG and SDG&E. The allocation is based on the manager's best assessment of the Quality Assurance Team Lead's annual activities devoted to the oversight of the SDG&E quality assurance operation. The labor and non-labor methodologies are the same. The assessment of the charging activity determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2010

The Quality Assurance Team Lead provides guidance and work direction over the quality assurance activities at both SCG and SDG&E. The allocation is based on the manager's best assessment of the Quality Assurance Team Lead's annual activities devoted to the oversight of the SDG&E quality assurance operation. The labor and non-labor methodologies are the same. The assessment of the charging activity determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2011

The Quality Assurance Team Lead provides guidance and work direction over the quality assurance activities at both SCG and SDG&E. The allocation is based on the manager's best assessment of the Quality Assurance Team Lead's annual activities devoted to the oversight of the SDG&E quality assurance operation. The labor and non-labor methodologies are the same. The assessment of the charging activity determined that the non-labor charges are driven by how labor is allocated.

Cost Center Allocation Percentage for 2012

The Quality Assurance Team Lead provides guidance and work direction over the quality assurance activities at both SCG and SDG&E. The allocation is based on the manager's best assessment of the Quality Assurance Team Lead's annual activities devoted to the oversight of the SDG&E quality assurance operation. The labor and non-labor methodologies are the same. The assessment of the charging activity determined that the non-labor charges are driven by how labor is allocated.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 5. Quality Assurance
 Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	3-YR Average	697	697	697	0	0	0	697	697	697
Non-Labor	3-YR Average	63	63	63	0	0	0	63	63	63
NSE	3-YR Average	0	0	0	0	0	0	0	0	0
Total		760	760	760	0	0	0	760	760	760
FTE	3-YR Average	9.2	9.2	9.2	0.0	0.0	0.0	9.2	9.2	9.2

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012 Total	0	0	0	0	0.0	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: A. Customer Service Field
Category-Sub: 5. Quality Assurance
Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	0	186	603	634	488
Non-Labor	0	47	67	56	64
NSE	0	0	0	0	0
Total	0	233	670	690	551
FTE	0.0	2.5	8.4	8.5	6.4
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	0	186	603	634	488
Non-Labor	0	47	67	56	64
NSE	0	0	0	0	0
Total	0	233	670	690	551
FTE	0.0	2.5	8.4	8.5	6.4
Vacation & Sick (Nominal \$)					
Labor	0	33	105	122	88
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	33	105	122	88
FTE	0.0	0.5	1.5	1.7	1.2
Escalation to 2009\$					
Labor	0	20	40	11	0
Non-Labor	0	4	4	1	0
NSE	0	0	0	0	0
Total	0	24	43	12	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	0	239	748	768	576
Non-Labor	0	51	71	57	64
NSE	0	0	0	0	0
Total	0	290	819	825	640
FTE	0.0	3.0	9.9	10.2	7.6

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: A. Customer Service Field
 Category-Sub: 5. Quality Assurance
 Cost Center: 2200-2206.000 - QUALITY ASSURANCE

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Cost Center: 2200-2154.000

Summary for Category: B. Customer Contact Center

	In 2009\$ (000) "Book Expense"			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	85	86	86	86
Non-Labor	1	5	5	5
NSE	0	0	0	0
Total	86	91	91	91
FTE	1.0	1.0	1.0	1.0

Cost Centers belonging to this Category:

2200-2154.000 CCC RESOURCE AND SERVICE LEVEL MANAGER

Labor	85	86	86	86
Non-Labor	1	5	5	5
NSE	0	0	0	0
Total	86	91	91	91
FTE	1.0	1.0	1.0	1.0

Beginning of Workpaper
2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: B. Customer Contact Center
Category-Sub: 1. CCC Resource & Service Level Manager
Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Activity Description:

Labor and non-labor costs associated with managing the clerical, financial, scheduling and forecasting activities within the Customer Contact Center for SCG and San Diego Gas & Electric (SDG&E), as well as managing the CCC's level of service.

Forecast Methodology:

Labor - Zero-Based

A zero based forecast was used to estimate the labor expense in this cost center , based on the annual salary of the manager charging the cost center.

Non-Labor - Zero-Based

A zero based forecast was used to estimate non-labor expense in this cost center, based on expected non-labor expenses for the manager.

NSE - Zero-Based

NSE is not applicable to this cost center.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. CCC Resource & Service Level Manager
 Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		107	110	119	110	112	112	112	112
Non-Labor		4	1	3	3	2	7	7	7
NSE		0	0	0	0	0	0	0	0
Total		111	111	122	113	114	119	119	119
FTE		1.1	1.1	1.1	1.0	1.0	1.0	1.0	1.0
		Allocations Out							
Labor		5	8	30	39	27	26	26	26
Non-Labor		0	0	1	1	1	2	2	2
NSE		0	0	0	0	0	0	0	0
Total		5	8	31	40	28	28	28	28
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		102	102	89	71	85	86	86	86
Non-Labor		4	1	2	2	1	5	5	5
NSE		0	0	0	0	0	0	0	0
Total		106	103	91	73	86	91	91	91
FTE		1.1	1.1	1.1	1.0	1.0	1.0	1.0	1.0
		Allocations In							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		102	102	89	71	85	86	86	86
Non-Labor		4	1	2	2	1	5	5	5
NSE		0	0	0	0	0	0	0	0
Total		106	103	91	73	86	91	91	91
FTE		1.1	1.1	1.1	1.0	1.0	1.0	1.0	1.0

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. CCC Resource & Service Level Manager
 Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	3	0	0	3	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	109	2	0	111	1.00	112	7	0	119	1.00
% Allocation										
Retained	75.60%	75.61%				76.85%	76.85%			
SEU	24.40%	24.39%				23.15%	23.15%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	82	1	0	83		86	5	0	91	
SEU	27	1	0	28		26	2	0	28	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	112	2	0	114	1.00	112	7	0	119	1.00
Total Alloc. Out	27	1	0	28		26	2	0	28	
Total Retained	85	1	0	86		86	5	0	91	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	85	1	0	86		86	5	0	91	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	0.00	0	0	0	0	0.00
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	112	7	0	119	1.00	112	7	0	119	1.00
% Allocation										
Retained	76.85%	76.85%				76.85%	76.85%			
SEU	23.15%	23.15%				23.15%	23.15%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	86	5	0	91		86	5	0	91	
SEU	26	2	0	28		26	2	0	28	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	112	7	0	119	1.00	112	7	0	119	1.00
Total Alloc. Out	26	2	0	28		26	2	0	28	
Total Retained	86	5	0	91		86	5	0	91	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	86	5	0	91		86	5	0	91	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: B. Customer Contact Center
Category-Sub: 1. CCC Resource & Service Level Manager
Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

The CCC Resource and Service Level Manager's labor is allocated based on total FTEs. There are 18 SCG and 5 SDGE FTEs (23 FTEs total) reporting to the manager. Based on historical activity, a flat rate for non-labor will be allocated for the estimated mileage and other miscellaneous non labor expenses. The weighted average calculation allocates 24.40% to SDG&E.

Cost Center Allocation Percentage for 2010

The CCC Resource and Service Level Manager's labor is allocated based on total FTEs. There are 18 SCG and 5 SDGE FTEs (23 FTEs total) reporting to the manager. Based on historical activity, a flat rate for non-labor of \$3,000 will be allocated for the estimated mileage and other miscellaneous non labor expenses. The weighted average calculation allocates 23.15% to SDG&E.

Cost Center Allocation Percentage for 2011

The CCC Resource and Service Level Manager's labor is allocated based on total FTEs. There are 18 SCG and 5 SDGE FTEs (23 FTEs total) reporting to the manager. Based on historical activity, a flat rate for non-labor of \$3,000 will be allocated for the estimated mileage and other miscellaneous non labor expenses. The weighted average calculation allocates 23.15% to SDG&E.

Cost Center Allocation Percentage for 2012

The CCC Resource and Service Level Manager's labor is allocated based on total FTEs. There are 18 SCG and 5 SDGE FTEs (23 FTEs total) reporting to the manager. Based on historical activity, a flat rate for non-labor of \$3,000 will be allocated for the estimated mileage and other miscellaneous non labor expenses. The weighted average calculation allocates 23.15% to SDG&E.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. CCC Resource & Service Level Manager
 Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	Zero-Based	0	0	0	112	112	112	112	112	112
Non-Labor	Zero-Based	0	0	0	7	7	7	7	7	7
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	119	119	119	119	119	119
FTE	Zero-Based	0.0	0.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	0	0	0	0	1.0	1-Sided Adj
Customer Contact Resource and Service Level Manager.						
2010	112	0	0	112	0.0	1-Sided Adj
Estimated annual salary of 1 Customer Contact Resource and Service Level Manager.						
2010	0	7	0	7	0.0	1-Sided Adj
Estimated miscellaneous non-labor, travel and mileage expense of Customer Contact Center Resource and Service Level Manager.						
2010 Total	112	7	0	119	1.0	
2011	112	0	0	112	0.0	1-Sided Adj
Estimated annual salary of 1 Customer Contact Resource and Service Level Manager.						
2011	0	7	0	7	0.0	1-Sided Adj
Estimated miscellaneous non-labor, travel and mileage expense of Customer Contact Center Resource and Service Level Manager.						
2011	0	0	0	0	1.0	1-Sided Adj
Customer Contact Resource and Service Level Manager.						
2011 Total	112	7	0	119	1.0	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. CCC Resource & Service Level Manager
 Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2012	112	0	0	112	0.0	1-Sided Adj

Estimated annual salary of 1 Customer Contact Resource and Service Level Manager.

2012	0	7	0	7	0.0	1-Sided Adj
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Estimated miscellaneous non-labor, travel and mileage expense of Customer Contact Center Resource and Service Level Manager.

2012	0	0	0	0	1.0	1-Sided Adj
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Customer Contact Resource and Service Level Manager.

2012 Total	112	7	0	119	1.0	
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Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: B. Customer Contact Center
Category-Sub: 1. CCC Resource & Service Level Manager
Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	82	86	96	91	95
Non-Labor	4	1	2	3	2
NSE	0	0	0	0	0
Total	85	87	98	94	97
FTE	0.9	0.9	0.9	0.8	0.8
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	82	86	96	91	95
Non-Labor	4	1	2	3	2
NSE	0	0	0	0	0
Total	85	87	98	94	97
FTE	0.9	0.9	0.9	0.8	0.8
Vacation & Sick (Nominal \$)					
Labor	14	15	17	17	17
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	14	15	17	17	17
FTE	0.2	0.2	0.2	0.2	0.2
Escalation to 2009\$					
Labor	12	9	6	2	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	12	9	6	2	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	107	110	119	110	112
Non-Labor	4	1	3	3	2
NSE	0	0	0	0	0
Total	111	111	121	113	114
FTE	1.1	1.1	1.1	1.0	1.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: B. Customer Contact Center
 Category-Sub: 1. CCC Resource & Service Level Manager
 Cost Center: 2200-2154.000 - CCC RESOURCE AND SERVICE LEVEL MANAGER

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Cost Center: 2200-0370.000

Summary for Category: C. Meter Reading

	In 2009\$ (000) "Book Expense"			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	736	766	766	766
Non-Labor	84	78	78	78
NSE	0	0	0	0
Total	820	844	844	844
FTE	31.2	32.7	32.7	22.5

**Cost Centers belonging to this Category:
 2200-0370.000 METER READ ALISO VIEJO**

Labor	736	766	766	766
Non-Labor	84	78	78	78
NSE	0	0	0	0
Total	820	844	844	844
FTE	31.2	32.7	32.7	22.5

Beginning of Workpaper
2200-0370.000 - METER READ ALISO VIEJO

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: C. Meter Reading
Category-Sub 1. Meter Reading Aliso Viejo
Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Activity Description:

This cost center contains the labor and non-labor costs associated with the non-management meter reading activities of the meter reading employees at Aliso Viejo district/base. This meter reading group performs meter reading and meter reading access related work connected with SCG gas meters and SDG&E electric meters in the south Orange County area and joint meter reading territory of both Companies. As a result of SDG&E smart meter, this shared service cost center will be a non-shared service cost center beginning in TY2012.

Forecast Methodology:

Labor - 3-YR Average

The three-year average forecast methodology best represents the labor costs to be forecast because water meter reading services were terminated with two Orange County municipalities in 2006 and 2007 and should not be included in forecasted expense. The three-year average methodology captures the high and low expenditures seen under a variety of conditions.

Non-Labor - 3-YR Average

The three-year average forecast methodology best represents the labor costs to be forecast because water meter reading services were terminated with two Orange County municipalities in 2006 and 2007 and should not be included in forecasted expense. The three-year average methodology captures the high and low expenditures seen under a variety of conditions.

NSE - 3-YR Average

NSE is not applicable to this cost center.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Summary of Results:

		In 2009\$ (000)								
		Adjusted-Recorded					Adjusted-Forecast			
Years		2005	2006	2007	2008	2009	2010	2011	2012	
		Total Incurred (100% Level)								
Labor		1,141	1,205	1,166	1,143	1,130	1,161	1,161	766	
Non-Labor		52	66	91	102	108	100	100	78	
NSE		0	0	0	0	0	0	0	0	
Total		1,193	1,271	1,257	1,245	1,238	1,261	1,261	844	
FTE		30.4	32.7	33.5	33.5	31.2	32.7	32.7	22.5	
		Allocations Out								
Labor		410	436	389	389	394	395	395	0	
Non-Labor		10	16	19	23	24	22	22	0	
NSE		0	0	0	0	0	0	0	0	
Total		420	452	408	412	418	417	417	0	
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
		Retained								
Labor		731	769	777	754	736	766	766	766	
Non-Labor		42	50	72	79	84	78	78	78	
NSE		0	0	0	0	0	0	0	0	
Total		773	819	849	833	820	844	844	844	
FTE		30.4	32.7	33.5	33.5	31.2	32.7	32.7	22.5	
		Allocations In								
Labor		0	0	0	0	0	0	0	0	
Non-Labor		0	0	0	0	0	0	0	0	
NSE		0	0	0	0	0	0	0	0	
Total		0	0	0	0	0	0	0	0	
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
		Book Expense								
Labor		731	769	777	754	736	766	766	766	
Non-Labor		42	50	72	79	84	78	78	78	
NSE		0	0	0	0	0	0	0	0	
Total		773	819	849	833	820	844	844	844	
FTE		30.4	32.7	33.5	33.5	31.2	32.7	32.7	22.5	

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	0	0	0	0	9.90	11	0	0	11	10.20
Directly Allocated	394	24	0	418	0.00	395	22	0	417	0.00
Subj. To % Alloc.	736	84	0	820	21.30	755	78	0	833	22.50
% Allocation										
Retained	100.00%	100.00%				100.00%	100.00%			
SEU	0.00%	0.00%				0.00%	0.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	736	84	0	820		755	78	0	833	
SEU	0	0	0	0		0	0	0	0	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,130	108	0	1,238	31.20	1,161	100	0	1,261	32.70
Total Alloc. Out	394	24	0	418		395	22	0	417	
Total Retained	736	84	0	820		766	78	0	844	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	736	84	0	820		766	78	0	844	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Retained	11	0	0	11	10.20	11	0	0	11	0.00
Directly Allocated	395	22	0	417	0.00	0	0	0	0	0.00
Subj. To % Alloc.	755	78	0	833	22.50	755	78	0	833	22.50
% Allocation										
Retained	100.00%	100.00%				100.00%	100.00%			
SEU	0.00%	0.00%				0.00%	0.00%			
CORP	0.00%	0.00%				0.00%	0.00%			
Unreg	0.00%	0.00%				0.00%	0.00%			
\$ Allocation										
Retained	755	78	0	833		755	78	0	833	
SEU	0	0	0	0		0	0	0	0	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	1,161	100	0	1,261	32.70	766	78	0	844	22.50
Total Alloc. Out	395	22	0	417		0	0	0	0	
Total Retained	766	78	0	844		766	78	0	844	
Allocations In	0	0	0	0		0	0	0	0	
Book Expense	766	78	0	844		766	78	0	844	

Southern California Gas Company
Test Year 2012 GRC - REVISED
Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: C. Meter Reading
Category-Sub: 1. Meter Reading Aliso Viejo
Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009

Meter reading activities performed on behalf of SDG&E are direct billed. All costs in the cost center are either retained or directly allocated.

Cost Center Allocation Percentage for 2010

Meter reading activities performed on behalf of SDG&E are direct billed. All costs in the cost center are either retained or directly allocated.

Cost Center Allocation Percentage for 2011

Meter reading activities performed on behalf of SDG&E are direct billed. All costs in the cost center are either retained or directly allocated.

Cost Center Allocation Percentage for 2012

Activities that have been direct billed to SDG&E in prior years will no longer be done effective 2012. All costs in this cost center will be retained.

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Forecast Summary:

		In 2009 \$(000) "Incurred Costs"								
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
		<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Labor	3-YR Average	1,145	1,145	1,145	16	16	-379	1,161	1,161	766
Non-Labor	3-YR Average	100	100	100	0	0	-22	100	100	78
NSE	3-YR Average	0	0	0	0	0	0	0	0	0
Total		1,245	1,245	1,245	16	16	-401	1,261	1,261	844
FTE	3-YR Average	32.7	32.7	32.7	0.0	0.0	-10.2	32.7	32.7	22.5

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010	5	0	0	5	0.0	1-Sided Adj

Part-time wage adjustment to adjust the forecast to the current 2009 Union Agreement escalation rate of 3.5% for Part-Time Labor (Allocated portion-Electric). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations - USS 2200-0370" for detailed analysis.

2010	11	0	0	11	0.0	1-Sided Adj
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Part-time wage adjustment to adjust the forecast to the current 2009 Union Agreement escalation rate of 3.5% for Part-Time Labor (Retained portion - Gas). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, "Part-time Meter Reader Wage Increase Calculations - USS 2200-0370" for detailed analysis.

2010 Total	16	0	0	16	0.0	
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2011	5	0	0	5	0.0	1-Sided Adj
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Part-time wage adjustment to adjust the forecast to the current 2009 Union Agreement escalation rate of 3.5% for Part-Time Labor (Allocated portion-Electric). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations - USS 2200-0370" for detailed analysis.

2011	11	0	0	11	0.0	1-Sided Adj
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Part-time wage adjustment to adjust the forecast to the current 2009 Union Agreement escalation rate of 3.5% for Part-Time Labor (Retained portion - Gas). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations - USS 2200-0370" for detailed analysis.

Southern California Gas Company
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 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj Type</u>
2011 Total	16	0	0	16	0.0	
2012	-390	0	0	-390	0.0	1-Sided Adj
<p>Elimination of electric meter reading in the Joint Meter Reading area for SDG&E due to SDG&E Smart Meter completion in this area (reduce out directly allocated costs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations; USS-2200-0370" for detailed analysis.</p>						
2012	0	-22	0	-22	0.0	1-Sided Adj
<p>Elimination of electric meter reading in the Joint Meter Reading area for SDG&E due to SDG&E Smart Meter completion in this area (reduce out directly allocated costs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations; USS-2200-0370" for detailed analysis.</p>						
2012	11	0	0	11	0.0	1-Sided Adj
<p>Part-time wage adjustment to adjust the forecast to the current 2009 Union Agreement escalation rate of 3.5% for Part-Time Labor (Retained portion - Gas). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Part-time Meter Reader Wage Increase Calculations - USS 2200-0370" for detailed analysis.</p>						
2012	0	0	0	0	-10.2	1-Sided Adj
<p>Elimination of electric meter reading in the Joint Meter Reading area for SDG&E due to SDG&E Smart Meter completion in this area (reduce out directly allocated costs). Refer to "Supplemental Workpaper 2FO004.000_Supp1.pdf, Detailed Workpaper Calculations; USS-2200-0370" for detailed analysis.</p>						
2012 Total	-379	-22	0	-401	-10.2	

Southern California Gas Company
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Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: C. Meter Reading
Category-Sub: 1. Meter Reading Aliso Viejo
Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	867	938	967	944	957
Non-Labor	47	61	88	101	108
NSE	0	0	0	0	0
Total	914	999	1,055	1,045	1,065
FTE	25.7	27.7	29.1	28.1	26.2
Adjustments (Nominal \$) **					
Labor	0	0	-28	0	0
Non-Labor	0	0	-2	0	0
NSE	0	0	0	0	0
Total	0	0	-29	0	0
FTE	0.0	0.0	-0.8	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	867	938	939	944	957
Non-Labor	47	61	86	101	108
NSE	0	0	0	0	0
Total	914	999	1,026	1,045	1,065
FTE	25.7	27.6	28.3	28.0	26.2
Vacation & Sick (Nominal \$)					
Labor	148	168	164	182	173
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	148	168	164	182	173
FTE	4.7	5.1	5.2	5.5	5.0
Escalation to 2009\$					
Labor	126	99	62	17	0
Non-Labor	6	5	5	2	0
NSE	0	0	0	0	0
Total	132	104	67	18	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	1,141	1,204	1,165	1,143	1,130
Non-Labor	53	66	91	102	108
NSE	0	0	0	0	0
Total	1,194	1,270	1,256	1,245	1,238
FTE	30.4	32.7	33.5	33.5	31.2

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

Summary of Adjustments to Recorded:

In Nominal \$ (000) "Incurred Costs"						
Year	2005	2006	2007	2008	2009	
Labor	0	0	-28	0	0	
Non-Labor	0	0	-2	0	0	
NSE	0	0	0	0	0	
Total	0	0	-29	0	0	
FTE	0.0	0.0	-0.8	0.0	0.0	

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adi_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005	312	0	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 15446973
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2005	-312	0	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 15446973
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2005	0	9	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 15538523
Meter Reading non-labor (uniforms, tools & supplies) associated to the reading of SDG&E electric and water meters by SCG (2200-0370).							
2005	0	-9	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 15538523
Meter Reading non-labor (uniforms, tools & supplies) associated to the reading of SDG&E electric and water meters by SCG (2200-0370).							
2005 Total	0	0	0	0.0			
2006	339	0	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 22120927
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2006	-339	0	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 22120927
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							

Southern California Gas Company
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 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2006	0	14	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 22154693
Non-labor (uniforms, tools and supplies) associated to Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2006	0	-14	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 22154693
Non-labor (uniforms, tools and supplies) associated to Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2006 Total	0	0	0	0.0			
2007	0	18	0	0.0	SSD_Type Transf	From IO_Ret	TP1NBW2010031 6154602930
Non-labor expenses for Meter Reading done by SCG for SDG&E electric meters							
2007	0	-18	0	0.0	SSD_Type Transf	To IO_Alloc	TP1NBW2010031 6154602930
Non-labor expenses for Meter Reading done by SCG for SDG&E electric meters							
2007	-28	0	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 6154729477
Labor expenses associated to Meter Reading done by SCG for water meters contracted to SDG&E (partial year)							
2007	0	-2	0	0.0	1-Sided Adj	N/A	TP1NBW2010031 6154900307
Non-labor expenses associated to Meter Reading done by SCG for water meters contracted to SDG&E (partial year)							
2007	0	0	0	-0.8	1-Sided Adj	N/A	TP1NBW2010061 6152907503
FTEs associated to the water meters read in the first half of 2007 for SDG&E. Water meter reading was discontinued by mid-year 2007.							
2007	313	0	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 24209920
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2007	-313	0	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 24209920
Meter reading of SDG&E electric and water meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2007 Total	-28	-2	0	-0.8			

Southern California Gas Company
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 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: C. Meter Reading
 Category-Sub: 1. Meter Reading Aliso Viejo
 Cost Center: 2200-0370.000 - METER READ ALISO VIEJO

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>	<u>From CCtr</u>	<u>RefID</u>
2008	0	23	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ200911131 23409100
Non-labor expenses associated to Meter reading done by SCG for SDGE electric meters							
2008	0	-23	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ200911131 23409100
Non-labor expenses associated to Meter reading done by SCG for SDGE electric meters							
2008	321	0	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 23441927
Meter reading of SDG&E electric meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2008	-321	0	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 23441927
Meter reading of SDG&E electric meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2008 Total	0	0	0	0.0			
2009	0	24	0	0.0	SSD_Type Transf	From IO_Ret	ATPERSIN20100 316152730970
Non-labor expenses associated to Meter Reading done by SCG for SDG&E electric meters							
2009	0	-24	0	0.0	SSD_Type Transf	To IO_Alloc	ATPERSIN20100 316152730970
Non-labor expenses associated to Meter Reading done by SCG for SDG&E electric meters							
2009	334	0	0	0.0	SSD_Type Transf	From IO_Ret	TPKAJ201006161 23936700
Meter reading of SDG&E electric meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2009	-334	0	0	0.0	SSD_Type Transf	To IO_Alloc	TPKAJ201006161 23936700
Meter reading of SDG&E electric meters by SCG meter readers (at Aliso Viejo Base - 2200-0370).							
2009 Total	0	0	0	0.0			

Southern California Gas Company
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 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Cost Center: 2200-8909.000

Summary for Category: D. Billed-in from SDG&E

	In 2009\$ (000) "Book Expense"			
	Adjusted-Recorded	Adjusted-Forecast		
	2009	2010	2011	2012
Labor	409	505	504	505
Non-Labor	10	9	9	9
NSE	0	0	0	0
Total	419	514	513	514
FTE	0.0	0.0	0.0	0.0

Cost Centers belonging to this Category:

2200-8909.000 Billed-in Cost Center for CS - FIELD OPERATIONS

Labor	409	505	504	505
Non-Labor	10	9	9	9
NSE	0	0	0	0
Total	419	514	513	514
FTE	0.0	0.0	0.0	0.0

Beginning of Workpaper
2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward
Category: D. Billed-in from SDG&E
Category-Sub 1. USS Billed_for CS - FIELD OPERATIONS
Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Activity Description:

This cost center was created for GRC to receive the billed-in costs for functional area - CS - FIELD OPERATIONS

Forecast Methodology:

N/A

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Category-Sub: 1. USS Billed_for CS - FIELD OPERATIONS
 Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Summary of Results:

		In 2009\$ (000)							
		Adjusted-Recorded					Adjusted-Forecast		
Years		2005	2006	2007	2008	2009	2010	2011	2012
		Total Incurred (100% Level)							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Allocations Out							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Retained							
Labor		0	0	0	0	0	0	0	0
Non-Labor		0	0	0	0	0	0	0	0
NSE		0	0	0	0	0	0	0	0
Total		0	0	0	0	0	0	0	0
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Allocations In							
Labor		231	267	389	442	409	505	504	505
Non-Labor		64	14	20	18	10	9	9	9
NSE		0	0	0	0	0	0	0	0
Total		295	281	409	460	419	514	513	514
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Book Expense							
Labor		231	267	389	442	409	505	504	505
Non-Labor		64	14	20	18	10	9	9	9
NSE		0	0	0	0	0	0	0	0
Total		295	281	409	460	419	514	513	514
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Southern California Gas Company
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 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Category-Sub: 1. USS Billed_for CS - FIELD OPERATIONS
 Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Calculation of Book Expense:

	2009 Adjusted-Recorded					2010 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
Subj. To % Alloc.	0	0	0	0	0.00	0	0	0	0	0.00
\$ Allocation										
Retained	0	0	0	0		0	0	0	0	
SEU	0	0	0	0		0	0	0	0	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Total Incurred	0	0	0	0	0.00	0	0	0	0	0.00
Total Retained	0	0	0	0		0	0	0	0	
Allocations In	409	10	0	419		505	9	0	514	
Book Expense	409	10	0	419		505	9	0	514	

	2011 Adjusted-Forecast					2012 Adjusted-Forecast				
	Labor	Non-Labor	NSE	Total	FTE	Labor	Non-Labor	NSE	Total	FTE
Directly Allocated	0	0	0	0	0.00	0	0	0	0	0.00
\$ Allocation										
Retained	0	0	0	0		0	0	0	0	
SEU	0	0	0	0		0	0	0	0	
CORP	0	0	0	0		0	0	0	0	
Unreg	0	0	0	0		0	0	0	0	
Allocations In	504	9	0	513		505	9	0	514	
Book Expense	504	9	0	513		505	9	0	514	

Cost Center Allocation Percentage Drivers/Methodology:

Cost Center Allocation Percentage for 2009
 N/A

Cost Center Allocation Percentage for 2010
 N/A

Cost Center Allocation Percentage for 2011
 N/A

Cost Center Allocation Percentage for 2012
 N/A

Southern California Gas Company
 Test Year 2012 GRC - REVISED
 Shared Services Workpapers

Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Category-Sub: 1. USS Billed_for CS - FIELD OPERATIONS
 Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Forecast Summary:

In 2009 \$(000) "Incurred Costs"									
Forecast Method	Base Forecast			Forecast Adjustments			Adjusted-Forecast		
	2010	2011	2012	2010	2011	2012	2010	2011	2012
Labor	0	0	0	0	0	0	0	0	0
Non-Labor	0	0	0	0	0	0	0	0	0
NSE	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Forecast Adjustment Details:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2010 Total	0	0	0	0	0.0	
2011 Total	0	0	0	0	0.0	
2012 Total	0	0	0	0	0.0	

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Category-Sub: 1. USS Billed for CS - FIELD OPERATIONS
 Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Determination of Adjusted-Recorded (Incurred Costs):

	2005 (\$000)	2006 (\$000)	2007 (\$000)	2008 (\$000)	2009 (\$000)
Recorded (Nominal \$)*					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2009\$					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2009\$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Southern California Gas Company
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Area: CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward
 Category: D. Billed-in from SDG&E
 Category-Sub: 1. USS Billed_for CS - FIELD OPERATIONS
 Cost Center: 2200-8909.000 - Billed-in Cost Center for CS - FIELD OPERATIONS

Summary of Adjustments to Recorded:

Year	In Nominal \$ (000) "Incurred Costs"				
	2005	2006	2007	2008	2009
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

Detail of Adjustments to Recorded:

<u>Year/Expl.</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj_Type</u>	<u>From CCtr</u>	<u>RefID</u>
2005 Total	0	0	0	0.0			
2006 Total	0	0	0	0.0			
2007 Total	0	0	0	0.0			
2008 Total	0	0	0	0.0			
2009 Total	0	0	0	0.0			

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Area: CSFC - CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-0164	000	OUTBOUND DIALING & CUST CORR (SCG)
2200-0165	000	CCC PLANNING & ANALYSIS (SCG)
2200-0344	000	CS TRAINING & DEVELOPMENT MANAGER
2200-0357	000	METER READING OPERATIONS STAFF
2200-0358	000	MTR READING CENTRAL AREA MGR
2200-0359	000	METER READING RIVERSIDE - BEAUMONT
2200-0361	000	MTR READING RIM-FOREST
2200-0362	000	METER READING FONTANA
2200-0363	000	METER READING CORONA
2200-0364	000	METER READING CHINO
2200-0365	000	METER READING MURRIETA
2200-0366	000	METER READING RAMONA
2200-0367	000	METER READING EL CENTRO & BLYTHE
2200-0368	000	MTR READ PALM DESERT & YUCCA
2200-0369	000	MTR READ SBRNDO-WRTWD-VICTORVILLE
2200-0371	000	METER READING SANTA ANA
2200-0372	000	METER READING DOWNEY
2200-0373	000	METER READING WHITTIER
2200-0374	000	METER READING ANAHEIM
2200-0375	000	METER READING LA JOLLA
2200-0376	000	METER READING GARDEN GROVE
2200-0377	000	METER READING INDUSTRY
2200-0378	000	METER READING AZUSA
2200-0379	000	METER READING OPER SUPPORT CENTRAL
2200-0380	000	MTR READING NORTH MGR
2200-0381	000	METER READING VALENCIA
2200-0382	000	METER READING BAKERSFIELD & PORTERVILLE
2200-0383	000	METER READING LANCASTER & MOJAVE
2200-0384	000	METER READING OXNARD
2200-0385	000	METER READING CANOGA
2200-0386	000	METER READING SIMI
2200-0387	000	METER READING VISALIA & HANDFORD
2200-0388	000	METER READING YUKON
2200-0389	000	METER READING TEMPLETON & SLO
2200-0390	000	METER READING SANTA MARIA & LOMPOC
2200-0391	000	METER READING SANTA BARBARA
2200-0392	000	METER READING SATICOY
2200-0393	000	METER READING HOLLYWOOD
2200-0394	000	METER READING 182ND STREET
2200-0395	000	METER READING SANTA MONICA
2200-0396	000	METER READING COMPTON

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Area: CSFC - CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-0397	000	METER READING PASADENA
2200-0398	000	METER READING OPERATIONS MGT
2200-0399	000	METER READING GLENDALE
2200-0400	000	METER READING OPER SUPPORT NORTH
2200-0401	000	CUSTOMER CONTACT CENTER DIRECTOR
2200-0403	000	LOS MANAGEMENT (LOS)
2200-0404	000	CCC TECHNOLOGY
2200-0405	000	BRANCH OFC AREA 7
2200-0406	000	COMMERCIAL & INDUSTRIAL
2200-0407	000	CCC SITE MANAGER SAN DIMAS
2200-0408	000	HIGH BILL INVESTIGATION
2200-0409	000	RESIDENTIAL MARKETING
2200-0410	000	SPECIAL INVESTIGATIONS
2200-0411	000	CCC SITE MANAGER REDLANDS
2200-0412	000	CENTRALIZED SET DESKS
2200-0414	000	AUTHORIZED PYMNT AGENCIES
2200-0415	000	BRANCH OFC AREA 8
2200-0416	000	BRANCH OFC AREA 1
2200-0417	000	BRANCH OFC AREA 2
2200-0418	000	BRANCH OFC AREA 3
2200-0419	000	BRANCH OFC AREA 4
2200-0420	000	BRANCH OFC AREA 5
2200-0421	000	BRANCH OFC AREA 6
2200-0440	000	REDLANDS DISPATCH SOUTH INLAND
2200-0445	000	SO INL FSVC SAN BERNARDINO
2200-0449	000	SO INL FSVC CHINO
2200-0451	000	SO INL CS DOM SAN BERNARDINO
2200-0452	000	SO INL FSVC FONTANA
2200-0454	000	SO INL CS DOM PALM DESERT
2200-0455	000	SO INL FSVC PLM DESERT
2200-0458	000	SO INL FSVC RIVERSIDE
2200-0460	000	SO INL CS DOM RAMONA
2200-0462	000	SO INL FSVC RAMONA
2200-0464	000	SO INL FSVC EL CENTRO
2200-0466	000	SO INL CS DOM CHINO
2200-0467	000	SO INL FSVC RIM FOREST
2200-0470	000	NORTHERN FSVC ALHAMBRA
2200-0473	000	NORTHERN FSVC AZUSA
2200-0475	000	SO INL FSVC CORONA
2200-0476	000	NORTHERN DOM ALHAMBRA/PASADENA
2200-0477	000	NORTHERN FSVC PASADENA

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Area: CSFC - CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-0490	000	CUSTOMER SERVICES NORTHERN DIRECTOR
2200-0493	000	NORTHERN F SVC VISALIA/HANFORD
2200-0495	000	NORTHERN DOM BAKERSFIELD
2200-0497	000	NORTHERN F SVC BAKERSFIELD
2200-0498	000	CHATSWORTH DISPATCH NORTHERN
2200-0502	000	NORTHERN F SVC SLO/TEMPLETON
2200-0503	000	NORTHERN DOM SLO/SANTA MARIA/TEMPLETON
2200-0505	000	NORTHERN F SVC SANTA MARIA
2200-0506	000	COMPTON DISPATCH PACIFIC COAST
2200-0507	000	ANAHIEM DISPATCH PACIFIC COAST
2200-0509	000	NORTHERN F SVC VENTURA
2200-0511	000	NORTHERN DOM VENTURA & SIMI
2200-0513	000	NORTHERN F SVC SANTA BARBARA
2200-0514	000	FIELD OP MGR NORTHERN CHATSWORTH
2200-0516	000	NORTHERN F SVC CANOGA
2200-0518	000	NORTHERN DOM VISALIA/HANFORD
2200-0519	000	NORTHERN F SVC SIMI VALLEY
2200-0521	000	NORTHERN DOM CANOGA/SATICOY
2200-0522	000	NORTHERN F SVC SATICOY
2200-0525	000	NORTHERN F SVC BRANDFORD
2200-0527	000	NORTHERN DOM BRANDFORD/GENDALE
2200-0529	000	NORTHERN F SVC GLENDALE
2200-0531	000	NORTHERN F SVC VALENCIA
2200-0533	000	NORTHERN DOM LANCASTER
2200-0534	000	NORTHERN F SVC LANCASTER
2200-0546	000	PACIFIC COAST F SVC DOWNEY
2200-0550	000	PACIFIC COAST F SVC WHITTIER
2200-0552	000	PACIFIC COAST F SVC ANAHEIM
2200-0554	000	PACIFIC COAST DOM ANAHEIM/LA JOLLA
2200-0556	000	PACIFIC COAST F SVC LA JOLLA
2200-0558	000	PACIFIC COAST DOM SANTA ANA/ALISO VIEJO
2200-0560	000	PACIFIC COAST F SVC ALISO VIEJO
2200-0561	000	PACIFIC COAST DOM DOWNEY/GARDEN GROVE
2200-0563	000	PACIFIC COAST F SVC GARDEN GROVE
2200-0566	000	PACIFIC COAST F SVC SANTA ANA
2200-0568	000	NORTHERN DOM AZUSA/INDUSTRY
2200-0570	000	NORTHERN F SVC INDUSTRY
2200-0571	000	CUSTOMER SERVICES PACIFIC COAST DIRECTOR
2200-0572	000	FIELD OP MGR1 COMPTON
2200-0573	000	PACIFIC COAST DOM WHITTIER/BELVEDERE
2200-0574	000	PACIFIC COAST F SVC BELVEDERE

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Area: CSFC - CS - FIELD OPERATIONS & CUSTOMER CONTACT
 Witness: Fong, Edward

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-0578	000	PACIFIC COAST FSVC JUANITA
2200-0579	000	SO INL CS DOM EL CENTRO
2200-0582	000	HUNTINGTON PARK FIELD SERVICES
2200-0584	000	COMPTON/HUNTINGTON PARK DOM
2200-0585	000	COMPTON FIELD SERVICE
2200-0587	000	PACIFIC COAST DOM SANTA MONICA/CRENSHAW
2200-0589	000	PACIFIC COAST FSVC CRENSHAW
2200-0591	000	PACIFIC COAST FSVC SANTA MONICA
2200-0594	000	PACIFIC COAST FSVC REDONDO BEACH
2200-0596	000	PACIFIC COAST DOM REDONDO/SAN PEDRO
2200-0597	000	PACIFIC COAST FSVC SAN PEDRO
2200-0599	000	PACIFIC COAST DOM JUANITA/HOLLYWOOD
2200-0600	000	PACIFIC COAST FSVC HOLLYWOOD
2200-1146	000	METER READING TRAINING OPERATIONS
2200-1214	000	CCC SPECIAL SERVICES MANAGER
2200-1370	000	QUALITY ASSURANCE (SCG)
2200-1371	000	CUSTOMER CONTACT MULTILINGUAL SUPPORT
2200-1372	000	CCC OPS SUPPORT (SCG)
2200-2024	000	MTR READING EAST MGR
2200-2025	000	METER READING PLANNING & ANALYSIS
2200-2029	000	MGR FIELD COLLECTIONS
2200-2031	000	FIELD COLLECTIONS - SCG2
2200-2050	000	BRANCH OFFICE OPERATIONS MGR - SCG
2200-2081	000	SO INL FSVC MURRIETA
2200-2082	000	SO INL FSVC BEAUMONT
2200-2088	000	AUTHORIZED PAYMENT LOCATIONS -SCG
2200-2099	000	CCC OPERATIONS SUPPORT REFUNDABLE
2200-2105	000	METER READING MANAGER
2200-2107	000	REF - FIELD OP MGR REDLANDS
2200-2113	000	PACIFIC COAST FSVC - YUKON
2200-2114	000	PACIFIC COAST DOM - YUKON
2200-2115	000	FOM PACIFIC COAST #2
2200-2150	000	NORTHERN DOM SANTA BARBARA
2200-2152	000	METER READING SYSTEMS
2200-2153	000	METER READING OPERATIONS MGR
2200-2155	000	CCC TECHNOLOGY MANAGER
2200-2156	000	CCC OPERATIONS SUPPORT MANAGER
2200-2192	000	NORTHERN DOM VALENCIA
2200-2196	000	BRANCH OFC REGIONAL SUPERVISOR 2
2200-2223	000	SO INL CS DOM FONTANA
2200-2224	000	SO INL CS DOM RIM FOREST

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Area: CSFC - CS - FIELD OPERATIONS & CUSTOMER CONTACT
Witness: Fong, Edward

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2200-2225	000	SO INL CS DOM BEAUMONT
2200-2226	000	SO INL CS DOM CORONA
2200-2227	000	SO INL CS DOM RIVERSIDE
2200-2228	000	SO INL CS DOM MURRIETA
2200-2230	000	SO INL CS DOM YUCCA VLY
2200-2231	000	SO INL FSVC YUCCA VLY
2200-2237	000	METER READING MONTEREY PARK
2200-2306	000	CCC IT PROJECT MANAGER - SCG