Application of Southern California Gas Company (U904G) for authority to update its gas revenue requirement and base rates effective on January 1, 2012.

Application 10-12-\_\_\_\_ Exhibit No.: (SCG-14)

# PREPARED DIRECT TESTIMONY OF DAVID G. TAYLOR ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**DECEMBER 2010** 



# TABLE OF CONTENTS

I. INTRODUCTION	1
A. Purpose of Testimony B. Summary of Request C. Overview of Operations	1
II. NON-SHARED SERVICES	3
A. Summary of Non-Shared Services Activities  1. Non-Shared Rents  2. Non-Shared Facility Operations	3
III. SHARED SERVICES	7
A. Introduction B. Summary of Shared Services Activities	8 10 11
IV. CAPITAL	12
A. Introduction B. Capital Request Detail  1. Infrastructure Improvements (Budget Code: 653) 2. Anaheim Building A Chiller Replacement 3. Compton Parking Lot 4. Downey ERC Chiller Replacement 5. Facilities Renewable Energy Efficiency Projects 6. MPK Building A Server Room Air Handler Replacement 7. MPK Data Center Master Plan 8. Tenant Improvement of Building C 9. MPK Data Center Generators 10. MPK Exterior Site Improvements 11. Redlands Headquarters Parking Lot Expansion 12. Spence St. Remodel 13. 703 – Environmental & Safety Blanket 14. Branch Offices - ADA and Ergonomics 15. GCT Lease Renegotiation 16. Natural Gas Vehicles ("NGV") Refueling Stations	
V. CONCLUSION	20
VI WITNESS OHALIFICATIONS	21

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# PREPARED DIRECT TESTIMONY OF

#### **DAVID G. TAYLOR**

# ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

(REAL ESTATE, LAND AND FACILITIES)

#### I. INTRODUCTION

#### A. Purpose of Testimony

The purpose of this testimony is to describe the Shared and Non-Shared Services performed by the Real Estate, Land and Facilities ("REL&F") organization for Southern California Gas Company ("SCG"), and to discuss why the 2012 Test Year ("TY") forecasted operating and maintenance ("O&M") and capital costs are reasonable. This testimony provides a breakdown of the functional activities of the REL&F organization by category (activity) for both Shared and Non-Shared Services portion of operating costs. REL&F activities consist of the following four major categories:

- Rents
- Capital Programs
- Facility Operations
- Land Services and Land Right-of-Way ("ROW")

#### **B.** Summary of Request

# Table SCG-DGT-1

#### **Summary of TY 2012 Change**

(Thousands of \$2009)

Description	2009 Adjusted- Recorded	TY 2012 Estimated	Change	Testimony Reference
Total Non-Shared Services	16,859	17,682	823	Section II
Total Shared Services	30,820	24,382	-6,438	Section III
Total O&M	47,679	42,064	-5,615	
Total Capital	17,151	22,876	5,725	Section IV

The 2012 TY request is primarily driven by rent escalations and increases in facility maintenance costs. All labor costs were based on the TY plus annualization of any vacancies and any incremental additions or non-labor transfers.

#### C. Overview of Operations

REL&F is a Utility Shared Services organization headed by a Director, who oversees activities performed at both SCG and San Diego Gas & Electric Company ("SDG&E"). REL&F provides services for the benefit of the Utilities as well as Sempra Energy's Corporate Center and non-utility affiliates. The scope of this testimony covers REL&F's costs for SCG.

REL&F is responsible for the administration of real estate, facilities, and land services for a combined portfolio of 3.55 million square feet separated by the following companies:

SDG&E: 1.20 million sq. ft. SCG: 2.08 million sq. ft. 0.349 million sq. ft. **Corporate Center:** 

REL&F plans, acquires, builds, and maintains the operating and non-operating real estate and facility assets in support of the delivery of gas and electric energy to our customers. The following provides a description of the organization and activities between Non-Shared and **Shared Services:** 

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		Non-Shared Services		
	Rents	Non-Shared SCG rent		
	<b>Facility Operations</b>	Non-Shared facility maintenance		
		Shared Services		

24	Rents	Shared SCG rent
25	Facility Operations	Shared facility maintenance
26	Capital Programs	Allocated in from SDG&E projects
27	Land and ROW	100% allocated in from SDG&E

#### II. NON-SHARED SERVICES

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#### Table SCG-DGT-2

#### **O&M Non-Shared Services**

(Thousands of 2009 dollars)

REAL ESTATE, LAND & FACILITIES			
	2009 Adjusted- Recorded	TY 2012 Estimated	Change
A. Non-Shared Facility Operations & Rents	16,859	17,682	823
Total	16,859	17,682	823

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The Non-Shared Services were consolidated into a single category which combined Facility Operations and Rents. Contractual increases for the branch office rents are the primary driver of cost increases at SCG. SCG has also expanded its parking and transportation subsidy programs. Aging infrastructure also has increased facility maintenance costs over the TY. Additional details for the cost increases are contained in my workpapers (Exhibit SCG-14-WP).

#### A. Summary of Non-Shared Services Activities

#### 1. Non-Shared Rents

SCG's Non-Shared rents are associated with the 47 branch office leases<sup>1</sup> and numerous ROW licenses. In general, contracted rents have gone up about 5% per year, including base rent and any operating expense escalation required from the landlord.

#### 2. Non-Shared Facility Operations

SCG's Facility Operations provides operation and maintenance support for utility facilities such as general offices, bases, multi-use sites, telecommunications sites and branch offices. Maintenance support is either done by company employees or by contracted services.

Facility Operations consists of 8 regions, each managed by a facility manager and a team of mechanics. Services include the negotiation and management of contracted services such as janitorial, landscaping, trash and pest control. In addition to these contracted services, the utility hires contractors for services such as electric, mechanical, Heating, Ventilation, and Air Conditioning ("HVAC") and fuel pumping system maintenance, fire safety, and UPS battery make-up water.

<sup>&</sup>lt;sup>1</sup> Excludes the branch office in Compton, which SCG owns.

In addition to contractors, an in-house staff of maintenance personnel provide a wide range of building maintenance, repair and other services (move management, telephony, copy center service, etc.).

A preventative maintenance and equipment inventory schedule has been completed for most of SCG facility equipment and entered into the MAXIMO work management system. This allows improved standardization for more efficient and timely preventative maintenance work. Work orders are originated via the web (intranet) and dispatched real time via wireless handheld units. In addition, Facility Operations has implemented tracking procedures for work orders and internal customer response time.

The REL&F organization manages 120 locations in approximately 2 million rentable square feet. These facilities cover a wide range of building types from general office to warehouses and operating centers. Table SCG-DGT-3 shows the various categories of facilities for SCG. This table includes facility square footage used by Corporate Center.

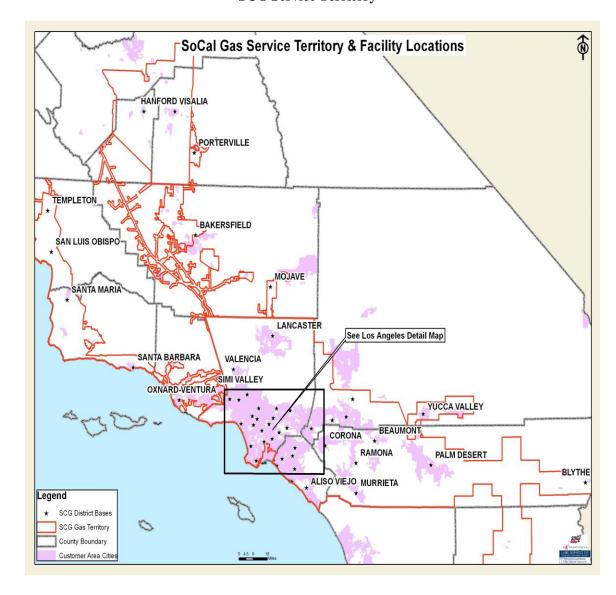
# Table SCG-DGT-3 SCG FACILITIES

				Average
		# Sites	Sq. Ft.	<u>Age</u>
1.	Operating Bases	64	868,414	44
2.	Regional HQ/Other	7	263,821	27
3.	Branch Office	48	90,013	30
4.	Multi-use	3	482,434	50
5.	Gas Company Tower	1	434,705	19
	TOTAL	<u>121</u>	1,967,534	40

As shown by this table, SCG's average age of its facilities is about 40 years old with facility ages ranging from 1 to over 80 years. In addition to these facilities, SCG has 53 leased telecommunications (or microwave) site locations that are serviced by REL&F.

The following maps illustrate the location of the SCG facilities, followed by a description of each facility type.

## **SCG Service Territory**







#### **Key Facilities**

## (1) Operating Bases

These facilities house the SCG operations activities. They support gas distribution and transmission crews, customer service field operations, and meter reading operations and storage operations that provide services to SCG customers.

# (2) Regional Headquarters/Other Office Facilities

These offices consist of Regional Headquarters buildings to house a number of administrative functions that support distribution and customer service field operations, and transmission/storage operations. In addition, this category includes two customer call centers and the Monterey Park ("MPK") facility (which is a shared

site) that houses various activities for Information Technology ("IT"), billing, payment processing, and fleet maintenance.

#### (3) Branch Offices

This category represents 48 payment offices for customer service to support bill payment and customer walk-in inquiries.

#### (4) Multi-Use Facilities

These facilities provide various support functions for SCG. They provide storage capacity for gas distribution material and equipment, various meter repair and fabrication shops, office space for gas distribution, gas transmission, fleet operations, and environmental solutions. Pipeline welding and classroom training for customer service employees is also provided at a shared site.

SCG also operates a testing lab at its Pico Rivera site to support environmental compliance and material testing and evaluation services for air quality and compressor services, applied technology, and chemical analysis. In addition, this category includes the SCG Energy Resource Center ("ERC").

#### (5) Gas Company Tower ("GCT")

This shared facility consists of the primary SCG administrative office space in downtown Los Angeles. The lease for the GCT was amended and restated, effective November 9, 2011, and is described in detail within the Shared Services section of this testimony.

#### III. SHARED SERVICES

#### A. Introduction

The Shared Services portion of REL&F includes the support that the organization provides for its shared facilities and services. The organizations within REL&F that provide Shared Services include the following:

#### Rents

- SDG&E shared sites
- Corporate Center shared sites
- Corporate Real Estate Administration

3	<ul> <li>Capital Programs – Corporate</li> </ul>	e Center Projects		
4	o Capital Programs – SCG Pro	jects		
5	• Facility Operations			
6	<ul> <li>Facility Operations</li> </ul>			
7	<ul> <li>Work Management</li> </ul>			
8	<ul> <li>Land Services and ROW</li> </ul>			
9	o GIS			
10	o Land ROW (SCG)			
11	Director of REL&F			
12	Table	e SCG-DGT-4		
13	O&M	Shared Services		
14	(Thousan	ds of 2009 dollars)		
	REAL ESTATE, LAND & FACILITIES			
		2009 Adjusted- Recorded	TY 2012 Estimated	Change
	A. Shared Rents	24,840	15,512	-9,328
	B. Shared Facility Operations	2,756	4,063	1,307
	C. USS Billed-in from SDG&E	3,224	4,807	1,583
	Total Shared Services (Book Expense)	30,820	24,382	-6,438
15 16 17	The key drivers of the O&M costs ar  • Reduction of GCT lease costs			
18	Transfer of janitorial costs from		Operations (\$800)	K).
19	<ul> <li>Increases in MPK costs due t</li> </ul>	•	•	
20	<ul> <li>Transfer of the Director posit</li> </ul>	_		
21	Further cost details can be found in r		συς (ψ170 <b>π</b> ).	
22	B. Summary of Shared Services Activ	vities		
23	1. Shared Services Rents			
24	SCG's Shared Services Rents catego	ory consists of the fol	lowing three work	groups:
25	• GCT Rents			

• Capital Programs

o Capital Programs Support

- Corporate Real Estate
- Telecom (Microwave) Rents

#### GCT Rents

The GCT rent represents the largest lease within the portfolio. This lease, which expires in November 2011, has been renegotiated reflecting a significant reduction in rent expense.

Consideration of alternatives to the GCT for a SCG headquarters was a 3-year process. A process was initiated to perform a long term needs analysis for a SCG headquarters location and facilities. The space study/needs analysis showed that demand for headquarters type space was relatively flat at about 1,500 workspaces (approximately 350,000 sq. ft.). This was a significant reduction from the current lease of about 550,000 sq. ft. Alternatives considered included buying a building and leasing existing space. Due to the current real estate market, a long term lease was preferred to lock in current competitive real estate costs as well as flexible terms (expansion/contraction/termination rights) to allow adjustment to changing space requirements.

Space was first analyzed in 94 communities against decision criteria. The decision criteria included cost, employee retention, business disruption, etc. Opportunities evaluated within the SCG property portfolio and build out of full space requirements on company owned property were not found to be financially competitive. A list of 40 potential properties was further assessed which was then narrowed to 20 based on the selection criteria. Of those, 12 were selected for requests for proposals, which after submittal and additional due diligence was reduced to 3 viable options. Of those, the option of remaining at the GCT with fewer floors was selected as the most viable alternative. This lease will retain 13 floors and release 8 that were part of the previous lease.

#### Corporate Real Estate

The Corporate Real Estate department provides strategic asset management, transaction management, lease negotiation and administration services for SDG&E, SCG, Corporate Center, and other affiliates upon request. This organization consists of a manager and

five full-time equivalents ("FTEs"), 2 of which are SCG employees. Costs are allocated based upon a management estimate of the work performed.

Corporate Real Estate is requesting additional non-labor funding to support an increase in pre-planning work for base expansions, branch office lease renewals and relocations, and renegotiation of numerous telecom site leases. An additional real estate advisor is also needed to assist with the increased workflow due to an increase in property sales, environmental buffer property acquisition adjacent to compressor stations, and an increase in miscellaneous projects including site master plan development, road access agreements, and material storage sites.

#### Telecom (Microwave) Tower Rents

These rents are increasing at an average of 5% per year and are allocated based upon an annual IT usage study.

#### 2. Shared Services Facility Operations

SCG's Facility Operations provides O&M support for utility facilities including general offices, bases, telecommunications sites, warehouse, and branch offices. Maintenance support is either done by company employees or by contracted services. The organization provides facility operations services to both Utilities, Corporate Center, and affiliates. SCG Facility Operations consists of the following workgroup areas:

- MPK and GCT
- Facility Maintenance
- Shared Transportation Programs
- Director, REL&F

Much of the Facility Operations activities for facility maintenance are Non-Shared Services. The Shared Services portion of the functional organization consists of 4 SCG cost centers and represents 2 major locations: the GCT and MPK. Most of the Shared Services activities in Facility Operations reflect costs for shared management or operational costs that overlap SDG&E, SCG, and the Corporate Center.

#### MPK and GCT

This cost center contains facility operations and maintenance expenses (e.g., mechanic and manager labor, facility operations non-labor expenses such as general maintenance, janitorial, landscaping, and security maintenance) for MPK and GCT.

These costs are allocated back to SDG&E, Corporate Center, and the affiliates based on a space study of the occupied floors and the respective Shared Services percentages of each occupying utility.

#### **Facilities Work Management**

Facilities Work Management consists of a team of employees that manage the facilities work plan, including workflow management and contract administration. These costs are allocated based upon a management estimate of the time spent supporting either SCG or SDG&E.

#### **Shared Transportation Program**

This cost center captures the costs for SDG&E, Corporate Center, and Global employees (if any) who either park at the GCT and/or participate in the rideshare/transportation program provided by SCG. These costs are allocated out to the appropriate entities in accordance with the Shared Services billing process described in the testimony of Edward Reyes (Exhibit SCG-24) and are not part of the 2012 TY request. Shared Service allocations are based upon a parking usage report, provided by the Human Resources department.

#### Director, REL&F

The Director of REL&F provides overall leadership and direction to the entire functional organization. The Director cost center contains the costs of Director and an administrative assistant. These costs are incurred at the company where the Director is employed, which is currently at SCG.

#### C. Shared Services Billed In from SDG&E

REL&F incurs many shared costs across both Utilities and Corporate Center. Most of the management functions are located at SDG&E and billed to SCG. The Facilities Capital Programs section, which manages all facilities capital and select O&M projects for SCG, is centralized at SDG&E and bills SCG based upon the work it performs. The Land and ROW

1 department supports SCG exclusively, yet the department is part of SDG&E. Many of the 2 Facility Operations support services, such as work order tracking and some managerial functions 3 are centralized at SDG&E and billed to SCG. 4 The largest portion of the cost increase is driven within the Capital Programs section. 5 Differences between repair and replacement of major equipment cause fluctuations in costs 6 between years. Therefore a 5-year average is appropriate forecasting methodology over the base 7 year. My SDG&E testimony and associated workpapers describes these costs in detail (see Exhibit SDG&E-20). 8 9 IV. CAPITAL 10 A. Introduction 11 12 13

The following Table SCG-DGT-5 provides a summary of the 2009-2012 capital expenditures for SCG facility capital projects. The capital summary includes blanket projects (individual project cost <\$1 million) and specific projects over \$1 million. The table only includes those facility projects in the Commission's jurisdiction and excludes projects with inservice dates beyond the 2012 TY. Costs shown are direct cost only (without loaders).

The key drivers for SCG facility capital projects are:

- (1) The impact of historical and forecasted growth and the increasing age of facilities at construction and operating centers;
- (2) Increased number of security, safety and environmental projects to meet regulatory requirements, provide for operational security of key facilities, and provide a safe work environment for employees;
- (3) Upgrades for facility energy efficiency and improvements to existing office sites;
- (4) Improvements to aging infrastructure for HVAC, plumbing, electrical, repaying, and other structural upgrades.

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# Table SCG-DGT-5 **Capital Expenditures**

(Thousands of 2009 dollars)

Budget Code	Description	2010	2011	2012
653	Infrastructure & Improvements Blanket	4,773	6,000	6,000
653	Anaheim Building A Chiller	1,668	1,500	0
653	Compton Parking Lot	0	0	1,302
653	Downey ERC Chiller Replacement	1,846	2,136	2,000
653	Facilities Energy Efficiency Projects	0	1,000	1,000
653	MPK Bldg A Server Room Air Handler	1,516	0	0
653	MPK Data Center Master Plan	0	359	6,141
653	MPK Data Center Generators	936	3,288	0
653	MPK Exterior Site Improvements	764	2,736	0
653	Redlands HQ Parking Lot	0	0	2,290
653	Spence St. Remodel	1,001	0	0
653	703 Environmental/Safety Blanket	963	1,451	1,451
654	Branch Office ADA and Ergonomics	3,678	4,500	0
697	GCT Lease Renegotiation TIs	7,391	18,596	0
734	NGV Refueling Stations	1.510	1,935	2,220
NA	Various other projects less than \$1mil	1,116	490	472
	Total	27,162	43,991	22,876

A breakdown of the costs contained in each of the budget codes shown above is

Below are project descriptions for the major projects. For a detailed description of each

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Facilities Operations and the operating departments identify requirements based on criticality of the facility, the age of the asset, and the implications for failure to complete the

1. Infrastructure Improvements (Budget Code: 653)

contained in the associated capital workpapers (Exhibit SCG-14-CWP).

**B.** Capital Request Detail

project, please see the associated capital workpapers.

replacement or modification. Failure to implement these projects could translate into reduced safety, disruption to the business, inability to meet business operational needs, higher costs to maintain and repair, and asset devaluation.

Projects are planned according to the availability of resources, lead times and priorities. Similar projects are bundled for economies of scale for better pricing in sourcing. Construction calculations are supported by industry professionals, including licensed architects and designers,

SCG Doc#249662

construction industry professionals, and IT domain experts using standard construction estimation practices.

This budget funds numerous building modifications, upgrades, and facility improvements to adequately support business initiatives, to extend the life of the asset, or increase the functionality of a building or site. Small projects under \$1 million are bundled when possible for economies of scale in sourcing. These projects vary year to year based on need, but address replacement of basic building systems and infrastructure. Each year requirements are prioritized to manage the facility assets, keep the employees safe and optimize real estate value. Scope of work may include modernization projects, improvements to implement best practices, and/or offer best alternatives for cost avoidance compared to other scenarios.

#### 2. Anaheim Building A Chiller Replacement

The existing Central Energy Plant ("CEP") chiller has failed on several occasions, resulting in increased maintenance costs. The Anaheim Campus has also grown in capacity and the existing CEP is not producing enough tonnage to the air handlers to efficiently cool the entire site.

The chiller unit is 18 years old and parts are becoming harder to procure and cost to maintain is not economical. The chiller's refrigerant pump failed in 2010 and the cost was \$21,000 to replace the pump only. This project requires installing a temporary unit for back up, removing the existing chiller and cooling tower, and installing a new chiller and cooling tower. A new boiler will be required as well. This is the main chiller in the Anaheim CEP which serves heating and cooling to all 6 buildings within the Anaheim Campus. When this chiller fails the entire site goes down. It can be difficult for the employees to remain at work when the heating or cooling fails. Therefore this is a significant project for the campus. There is a 2011 component to add a third chiller and associated piping to serve additional buildings not currently being served by the central energy plant.

#### 3. Compton Parking Lot

The existing parking lot at the Compton Headquarters is over 30 years old. Cracks and low spots over time have grown and created some possible safety concerns with foot traffic walking in the existing parking lot. The need for repairs has become greater over time, and removal and replacement of the existing asphalt is needed. With this work the parking lot will meet all current storm water requirements.

4. Downey ERC Chiller Replacement

The ERC will improve the efficient use and conservation of energy and water resources by developing a complete design for the replacement of the existing HVAC system and related piping. The existing system is identified as under-performing or nearing the end of the useful life cycle. Due diligence in the assessment of the use and maintenance requirements of the existing system caused the team to develop a design that will result in an innovation and a sustainable approach while demonstrating commercial viability that improves lifecycle costs and end user benefits. System performance and energy efficiency will be supported by a newly designed and installed Building Management System ("BMS").

SCG, through its energy efficiency program administration responsibilities, is seen as a leader in California's energy efficiency efforts. The showcase of these efforts is the company's ERC which promotes energy efficiency and green building technologies. The ERC build out was performed in 1996 as an expansion of the SCG base originally constructed in 1957. The building is currently served by a variety of HVAC system components. Due diligence in the assessment of the existing mechanical system, lighting and building management system resulted in the development of a five-year master plan with the first phase to be performed and completed in 2010. A copy of the plan is attached in my workpapers.

There is an existing chilled water plant consisting of three (3) 30-ton gas-fired absorption chillers. Of these three, two (2) chillers are not operating properly and need replacement. The project will be scheduled through December 31, 2011. The first phase of the project will begin with the design and construction of an expanded chilled water system and the redesign of the piping configuration. Consequently, the existing gas-fired chiller plant capacity will be increased from the current 90-ton total installed capacity to a pre-engineered estimate of 230-ton total installed capacity. The scope under the first phase will include architectural and engineering design in addition to structural, mechanical, electrical and plumbing engineering. The equipment to be purchased and installed in this phase includes two (2) new 100-ton chillers; new primary chilled water pumps to match new chiller configuration; two (2) new condenser water pumps to match the new chiller configuration; two (2) new commercial grade cooling towers matched to the capacity of the new chilled water system; new piping configuration to support new condenser water system and chilled water system and installation of a new boiler to

accommodate new chilled water plant design. In addition, newly designed electrical infrastructure will be installed to support all new equipment.

The design of a new performance specification for the installation of a building automated system ("BAS") and controls to support the mechanical system will be included in the scope of work under Phase I. Phase II of the system will include the purchase and installation of four (4) new and efficient variable volume air handler units to replace the existing units which are identified as under-performing and/or nearing the end of the useful lifecycle. Three (3) air conditioning packaged units will be purchased and installed to replace the existing units which each have exceeded their lifecycle and are either under-performing or not performing. All three air conditioning units will be replaced with high efficiency and environmentally friendly systems.

#### 5. Facilities Renewable Energy Efficiency Projects

Install Rooftop PV systems at various sites to support federal, state, and company renewable energy initiatives, as well as save electric demand, energy and costs. Install Demand Response systems at various sites to support state and company demand response initiatives, as well as save electric demand, energy and costs.

These systems will not only improve the various sites' operational characteristics (while reducing costs), but will also reduce system-wide power demand at the most critical periods, which will alleviate grid congestion and increase system reliability.

#### 6. MPK Building A Server Room Air Handler Replacement

Continuing disaster recovery improvements have resulted in a 2N electrical service redundancy as required for Tier 1 critical services facilities such as MPK Buildings A and B. Redundancy is also required for the mechanical systems (chilled water plant).

Provide increased reliability and operating efficiency for critical server room operations with the replacement of 14 old air handlers with new custom designed units featuring humidity controls and greater energy efficiency. Current equipment has out-lived its life expectancy and must be replaced to avoid unscheduled server room outages. Existing units are no longer reliable for this use and they no longer meet current energy efficiency standards.

#### 7. MPK Data Center Master Plan

MPK has experienced a 24% growth in space demand over the last 5 years and is expected to continue to grow. An expansion of the data center and associated support groups has increased the need for space and services.

#### 8. Tenant Improvement of Building C

Complete demolition of all interior furnishings and finishes and installation of new building systems designed to meet the new use. Abatement is expected. Structural modifications to the facility may be necessary, and will be determined after a complete review of the facility and when the scope of work requirements has been completed. The new work will include all infrastructure and support systems necessary for a new stand-alone Data Center that will supplement the existing site services. The building improvements will include new redundant, air-cooled chillers (dedicated back-up to the facility), and new mechanical and electrical distribution infrastructure.

#### 9. MPK Data Center Generators

Growth and utilization of the MPK data center, as described above, requires improvements to the electrical distribution system needed to ensure full 24/7 capabilities.

Increased emergency power capacity will be required to meet current and future needs at the data center.

#### 10. MPK Exterior Site Improvements

Resolve on-going deterioration of the MPK parking lot due to damage from trees, weather, age, and heavy traffic. Reduce storm-water runoff. Provide adequate illumination for safe walking during after hours or for security needs. The site improvements will ensure environmental compliance, increase overall energy efficiency of the site, improve site security, and improve sewer functionality.

#### 11. Redlands Headquarters Parking Lot Expansion

The Redlands Headquarters Facility seats approx 450 to 500 employees. The Headquarters incurs a monthly cost of approx \$7K to rent additional parking stalls due to inadequate parking lot capacity. Creating additional parking in the adjacent lot will supply needs at peak time when building is at its maximum occupancy.

#### 12. Spence St. Remodel

The project request is specifically for upgrades to the control room to meet current pipeline standards for employees in this environment. These upgrades include ADA (Americans with Disabilities Act) compliance and ergonomic furniture, kitchen area and restroom renovation. The roof will be replaced during this time as well. New carpet and wall coverings will be installed. The facility will be brought up to current ADA standards during this renovation.

#### 13. 703 – Environmental & Safety Blanket

This budget funds building and system modifications, site upgrades, and other facility improvements directed to safeguard SCG occupied facilities and sites, protect employees and company property, adhere to codes and regulations, and ensure safety and environmental compliance. Small projects under \$1 million are bundled when possible for economies of scale in sourcing. These projects vary year to year based on changes to existing or proposed regulations.

Facilities Operations and the business units identify requirements based on codes, regulations, and best management practices for environmental and safety. Failure to complete can result in increased risk, NOVs and fines.

#### 14. Branch Offices - ADA and Ergonomics

This project involves bringing each branch office location into compliance with current ADA Accessibility Guidelines, California Building Code, and California Title 24 guidelines. In addition, SCG plans to install adjustable height work tables and stools at each employee position to allow employees to sit or stand during the workday, thereby reducing the risk of repetitive motion injury.

#### 15. GCT Lease Renegotiation

As stated earlier, the GCT currently leases approximately 550,000 sq. ft. of office space to SCG under a lease that was amended and restated, effective November 9, 2011. After extensive evaluation of alternatives and negotiations, it was determined that the best alternative was to remain in the GCT but with significantly less space. A new lease was executed in July 2010 for approximately 350,000 sq. ft. with a lease term of 15 years to begin at the expiration of the current lease. The premises will be used for SCG headquarters and other staff functions to support the business needs.

This project is for significant tenant improvements at the GCT to accommodate for less leased office space. Moreover, there have been no significant tenant improvements since SCG moved into the GCT 20 years ago. With the intention of remaining in the existing space for at least 15 more years, a space rehabilitation is required. A \$7.404 million allowance is to be funded by the landlord in late 2011 for tenant improvements.

This project covers the construction costs for the renovation, repair and code compliance upgrades. This includes a remodel of remaining square footage necessary to optimize occupancy and meet business unit needs. Space plans are to be updated. Furniture, office space, and meeting rooms are to be refurbished or replaced, and telecom network infrastructure is to be updated. Costs include design, fees, permits, code upgrades, cost to repair and refurbish existing furniture (or other comparable alternative) and cost of floor renovation and repair.

The project budget includes the following:

- Company Labor \$0.5 million
- Leasehold improvements for construction and renovation \$22.8 million
- Furniture \$7.7 million
- Network Equipment \$2.4 million

The budgets were based upon preliminary estimates completed in the first quarter of 2010 by an architect and an independent general contractor. Costs for network equipment upgrades were provided by the IT Department. Design, engineering, and permitting are scheduled for 2010 and construction is scheduled for 2011.

#### 16. Natural Gas Vehicles ("NGV") Refueling Stations

NGV refueling stations will be upgraded to enhance the refueling reliability, capacity and response time for public and SCG Fleet NGV users at SCG NGV fueling stations. Currently, 9 of the 22 SCG-owned stations provide dual utility and public fueling service. The capital infusion will provide the following enhancement to SCG's current NGV station infrastructure:

- 1. Provide additional throughput at all 9 public accessible and heavy use stations;
- 2. Increase storage and operating pressure of critical stations from 3600 psig to 4500 psig;
- 3. Provide backup compressors at all of SCG NGV public fueling stations to improve reliability and capacity;

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public use of CNG as a vehicle fuel.

V. CONCLUSION

The amounts requested for the 2012 TY for REL&F are necessary to meet the needs of utility operations and customer service. The forecasts presented in this testimony are based on an evaluation of both historical and 2009 adjusted recorded expenses and the incremental increases and decreases forecasted over the 2010-2012 period. Furthermore, the costs reflect the appropriate Shared Service allocations for SDG&E, SCG, Corporate Center, and affiliates.

4. Standardize on critical compression equipment at all SCG NGV stations to

5. Install 3 new NGV stations (public accessible) at strategic locations throughout

SCG service territories to enhance SCG fleet utilization of NGVs and encourage

improve reliability and return-to-service time following unscheduled maintenance

Therefore, SCG respectfully requests that the Commission adopt the forecasted O&M and capital costs reflected in this testimony.

This concludes my prepared direct testimony.

on aging infrastructure;

#### VI. WITNESS QUALIFICATIONS

My name is David G. Taylor, P.E., Director of Real Estate, Land and Facilities for SCG and SDG&E. The combined departments of my organization are responsible for managing the entire real estate portfolio, including acquisition and disposition of property, rents, facility capital programs, facility maintenance, and land right of way acquisition and administration.

I hold a Bachelor's of Applied Science degree in mechanical engineering from the University of Waterloo in Waterloo, Canada and a Master's of Science degree in mechanical engineering from the University of California, Santa Barbara.

I have a broad background in engineering and natural gas pipeline operations with over twenty four years of experience with SCG, six years with Pacific Gas and Electric Company, and six years as an engineering intern with TransCanada Pipelines. At Sempra Energy, I have held a number of key technical and managerial positions with increasing responsibility in Gas Transmission, Engineering, and Major Markets departments. In these positions, I was responsible for system control operations throughout the energy crisis years, analytical engineering studies, and transmission line compressor station design, construction, operations and maintenance. I have held my current position as the Director of Real Estate, Land and Facilities since April, 2010.

I have previously testified before the Commission.