

**ORA DATA REQUEST  
ORA-SCG-DR-015-DAO  
SOCALGAS 2016 GRC – A.14-11-004  
SOCALGAS RESPONSE  
DATE RECEIVED: NOVEMBER 26, 2014  
DATE RESPONDED: DECEMBER 19, 2014**

**Exhibit Reference:** SCG-4, Gas Distribution O&M and Capital Expenditures

**Subject:** AMI, Operator Qualification Program, Training Services, Quality Assurance and Compliance Assurance, and Field Technology Support

**Please provide the following:**

1. The number of AMI meters SoCalGas plans to install and associated expense for each year from 2014-2016.

**SoCalGas Response:**

ORA revised this question in data request ORA-SCG-DR-026-DAO.

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2. Referring to page FBA-59 wherein SoCalGas requests \$349,000 for 5 Operator Qualification Clerks (OQC) in 2015 and 2016, please provide the following:
- a. The number of OQCs or equivalent employees assigned to the Operator Qualification Program each year from 2009-2014 YTD.
  - b. The annual labor and non-labor expenses SoCalGas incurred each year from 2009-2014 for the OQCs or equivalent employees identified in response to 2(a) above.
  - c. If the OQC positions are newly created for 2015 and 2016, please so state, and identify the job title of employees who currently perform the activities described for the 5 OQCs being requested for 2015 and 2016.
  - d. Please identify the number of covered tasks covered in SoCalGas' Operator Qualification Program each year from 2009-2014 YTD.
  - e. SoCalGas states on lines 11-12, "Because SoCalGas and SDG&E implement one consistent Operator Qualification Program, program enhancements are implemented across both companies." Please identify the (i) annual OQ program costs, (ii) SDG&E's share, and (iii) account(s) used to assign/track costs for SDG&E each year from 2009-2013 and for 2014 through 2016.

**SoCalGas Response:**

- a. The table below shows the Operator Qualification Clerks or equivalent employees assigned to the Operator Qualification Program each year from 2009 – 2014 year-to-date.

	2009	2010	2011	2012	2013	2014 YTD
Contract Employees	1	1	1	1	1*	
Regular Employees						1

\* The contract employee was hired as a regular employee in December 2013.

- b. The table below shows the 2009 – 2013 estimated annual labor and non-labor expense SoCalGas incurred for the employees identified in response to 2.a. above. The 2014 expenses are not readily available.

Year	2009*	2010*	2011	2012	2013
Estimated Labor (Thousands of 2013\$)	\$0	\$0	\$0	\$0	\$0
Estimated Non-Labor (Thousands of 2013\$) <sup>3</sup>	\$31	\$31	\$31	\$35	\$38

\* Non-labor for 2009 and 2010 was not tracked separately. Non-labor for those years is estimated based on the 2011 non-labor.

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**SoCalGas Response to Question 2, Continued:**

- c. The Operator Qualification Clerks are newly created positions. The job title of the employee currently performing the activities is Project Specialist.
- d. The table below shows the total number of covered tasks per year in the SoCalGas Operator Qualification Program.

Year	2009	2010	2011	2012	2013	2014 YTD
Number of Covered Tasks	52	52	52	52	55	55

- e. The shared services workpaper for Operator Qualification can be found on pages 154 – 161 of Exhibit SCG-04-WP. This workpaper shows the historical 2010 – 2013 Operator Qualification shared costs and the shared base forecast.

The incremental Operator Qualification program requirements for each company are forecasted separately for SoCalGas and SDG&E and can be found in the respective testimonies. Testimony and workpaper locations are shown in the table below:

	Testimony			Workpaper		
	Exhibit	Section	Pages	Exhibit	Pages	Supplemental
Shared Costs and Base Forecast	SCG-04	III.B.	FBA-76 - 86	SCG-04- WP	154 - 161	N/A
Incremental SoCalGas Activities	SCG-04	II.D.2.a.	FBA-57 - 60	SCG-04- WP	87 - 107	SCG-FBA- O&M-SUP- 006
Incremental SDG&E Activities	SDG&E- 04	II.D.1.b. i	FBA-53 - 54	SDG&E- 04-WP	86 - 95	SDGE-FBA- O&M-SUP- 003

SoCalGas and SDG&E also forecasted incremental training hours for field employees that will need to be qualified under the expanded Operator Qualification program. For SoCalGas, those additions can be found on pages FBA-26, FBA-30, and FBA-47 of Exhibit SCG-04. For SDG&E, the Operator Qualification Training can be found on pages FBA-30, FBA-35, and FBA-42 of Exhibit SDG&E-04.

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**SoCalGas Response to Question 2.e., Continued:**

- i. The 2010 – 2013 historical O&M costs for the Operator Qualification program are shown in the table on page 155 of Exhibit SCG-04-WP:

Years	Adjusted-Recorded				
	2009	2010	2011	2012	2013
Labor	0	183	131	156	190
Non-Labor	0	0	44	46	88
NSE	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>184</b>	<b>176</b>	<b>203</b>	<b>278</b>
FTE	0.0	2.0	1.5	1.7	2.0

Prior to 2010, Operator Qualification costs were not tracked separately, so the 2009 costs are not readily available. 2014 year-to-date costs are not available.

- ii. The shared service workpaper for Operator Qualification on page 156 of Exhibit SCG-04-WP shows the percentage of costs retained in SoCalGas and the percentage allocated to SDG&E for 2013. For the years 2010 – 2013, 80% of costs were retained in SoCalGas and 20% were allocated to SDG&E. As stated in response to Question 2.e.ii. above, this cost center was established in 2010, so the 2009 costs are not readily available.
- iii. SoCalGas uses cost center 2200-2344 to track Operator Qualification Program costs. This cost center is associated with the Operator Qualification workgroup. As noted in response to e.i. above, Operator Qualification costs were not tracked separately for 2009.

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3. On page FBA-59 SoCalGas states, “The program will be expanding from 55 tasks to 125 tasks. Therefore, in the new program, there will be 250 tests. These tests are used to qualify the approximately 3,000 employees, in 35 job classifications that form part of SoCalGas’ Operator Qualification program.”
- a. Has SoCalGas communicated to any Commission staff, including CPUC auditors, of the proposed program expansion?
  - b. Did SoCalGas base the number of 3,000 employees and 35 job classifications on the current staffing or on the test year proposals?
  - c. How did SoCalGas determine the additional 70 tasks?
  - d. Provide the schedule (number of employees and timeframe), beginning in 2015, that SoCalGas will be using to qualify the 3,000 employees as a result of the new program.
  - e. Provide the number of employees tested/evaluated/qualified under the OQ program each year from 2009-2014 YTD.

**SoCalGas Response:**

- a. At the November 2013 CPUC Operator Qualification audit, verbal indications were communicated to the CPUC auditors about adding some new tasks, but not all 70 tasks.

After completion of the revision to the Operator Qualification Gas Standard, and as tasks are added to the program, a formal written communication will be sent to the Commission

- b. SoCalGas based the number of employees and job classifications on current staffing.
- c. SoCalGas compared the ASME B31Q documentation to our current task list to determine the additional tasks to be added to the program. There are 55 tasks currently, and the program will be expanding to 125 tasks, which is a difference of 70 tasks.
- d. SoCalGas is projecting to begin the qualification of our employees in 2015 by qualifying approximately 1,000 employees per year for three years. An exact schedule has not been established beyond this approximation
- e. Below are the number of employees initially or subsequently qualified or tested under the Operator Qualification program:

Year	2009	2010	2011	2012	2013	2014 YTD as of 12/4/14
Employees Qualified / Tested	698	298	353	757	795	899

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4. On workpaper page 107, SoCalGas identifies 9 FTEs and \$1.080 million under Centralized Training. Provide the number of FTEs assigned to and expenses incurred by the OQ program each year from 2009-2014 YTD, by job category such as those identified on page 107 of the workpapers (i.e. Training Instructors, Technical Specialists, Administrator).

**SoCalGas Response:**

Please refer to the response to Question 2.e. above for information about the Operator Qualification program historical O&M costs. The historical FTEs are shown in the table provided in response to Question 2.e.i.

Below is a list of the employees assigned to the Operator Qualification department in each year, by job category:

	2009	2010	2011	2012	2013	2014 YTD
Operator Qualification Supervisor	1	1	1	1	1	1
Technical Specialist	1	1	1	1	1	2
Contract Administrative Associate	1	1	1	1	1	
Project Specialist						1
Technical Advisor (Part-Time)			0.5	0.5	0.5	0.5
Operator Qualification Project Manager						1

In addition, several Training Instructors assisted the Operator Qualification department each year as subject matter experts with training / testing material development; however, their time was not tracked. It is estimated that their time is approximately equal to 2 FTEs per year.

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5. On pages FBA-60 to 63, SoCalGas discusses Training Services.
- a. Please provide the annual expenses incurred for Training Services each year from 2009-2014YTD.
  - b. Please provide the number of FTEs assigned to Training Services, by job classification, each year from 2009-2014.

**SoCalGas Response:**

- a. Please see the table below for the annual O&M training expenses incurred by Training Services. Please note that 2009 and a portion of 2010 include OpEx related expenses and FTEs, since they were not tracked in a separate cost center at that time, so there are more FTEs than training services employees shown in the response to 5.b. below. 2014 expenses are not available.

Year	2009	2010	2011	2012	2013
O&M Training Expenses (Thousands of 2013\$)	\$2,343	\$2,188	\$2,657	\$3,158	\$3,183
FTEs	20.9	21.0	25.3	28.8	26.8

- b. The FTEs are shown in the table provided in response to Question 5.a. above. The table below shows the employees assigned to Training Services, by job classification, each year from 2009 through 2014 year-to-date.

Job Classification	2009	2010	2011	2012	2013	2014 YTD
Operation Training Instructor	8	10	15	18	18	14
Sr. Operation Training Instructor	0	0	0	0	1	1
Training Specialist	1	2	2	2	2	2
Admin Associate	0	0	1	1	1	1
Technical Advisor	1	1	4	6	4	2

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6. On page FBA-63 to FBA 64 SoCalGas discusses the elements of its quality assurance and compliance assurance functions. Please provide the following information regarding this subject:
- a. A copy of the project scope and study results for the Quality Assurance program pilot under DIMP and recorded expenses incurred since the program’s implementation to now.
  - b. A detailed explanation showing how the pilot program led to the proposed addition of 13 employees (1 Team Lead and 12 Quality Assurance Specialists) in 2016 and include a copy of all calculations and supporting documentations used to derive the proposed employee additions.
  - c. Does SoCalGas currently have a Quality Assurance program for gas operations pipeline maintenance? If yes, please provide (i) a copy of the program scope, (ii) the number of employees assigned to this program, (iii) the annual expenses from 2009-2014, and (iv) a list identifying the new/additional activities that the new Quality Assurance program will cover in 2016 compared to the current Quality Assurance program.

**SoCalGas Response:**

- a. A copy of the project scope and study results can be found in the separately provided document, SCG-ORA-DR-015-DAO\_Q6.pdf.

The recorded expenses through 2013 can be found in the table below. Amounts are shown in nominal dollars, and include vacation and sick time. 2014 expenses are not readily available.

	2011	2012	2013
Employees	2 Part Time*	2 Part Time*	5**
Annual Expense (Nominal \$)	\$ 78,772	\$ 17,226	\$ 340,955

\* Part Time Instructors

\*\* DIMP Quality Assurance Program fully staffed in the third quarter of 2013



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**SoCalGas Response to Question 6, Continued:**

- b. The calculations and assumptions to estimate the 13 Quality Assurance FTEs is shown below.

Desired Frequency of Audits for Each Base

= Every Other Month  
= 6 Audits / Base / Year

Total Base Audits to Be Completed per Year for All 52 SoCalGas Bases

= (6 Audits / Base / Year) \* (52 Bases)  
= 312 Base Audits / Year

Estimated Monthly Audits That Can Be Completed by Each FTE

= 2 Audits / Month / FTE  
= 24 Audits / Year / FTE

FTEs Required to Complete 312 Base Audits per Year:

= (312 Base Audits / Year) / (24 Audits / Year / Specialist)  
= 13 FTEs

- c. Gas Distribution does not currently have a separate Quality Assurance program for Field Operations and Maintenance. The DIMP Quality Assurance program mentioned in response to Question 6.a. above reviews leak survey, pipeline patrol, bridge and span inspections, and valve inspections for Gas Distribution facilities. This is the program that will be included in routine Gas Distribution operations starting in 2016.

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7. Referring to Gas Operations Pipeline Maintenance, Cathodic Protection, as discussed on page FBA-64 to FBA-65, provide (a) the number of employees assigned to Cathodic Protection, for program management as well as field employees, by employee classification, and highlight the number of Cathodic Protection Technical Advisors, for each year from 2009-2014 YTD, (b) the annual expenses incurred for Cathodic Protection each year from 2009-2014 YTD, (c) an explanation of how SoCalGas determined it will need 2 Cathodic Protection Technical Advisors by 2016, (d) all supporting documents and calculations to support the claim that CP systems are requiring additional analysis and improvements in 2016 and beyond compared to previous years, (e) all supporting documents and calculations to support SoCalGas’ claim that the current CP systems will be improved as a result of additional technical and analytical expertise, (f) a statement describing the specific improvements of the new CP system compared to previous years, and (g) all supporting documents and calculations to support SoCalGas’ implied claim that the loss of expertise due to workforce turnover is different and worse than the base year.

**SoCalGas Response:**

- a. Please see the table below for the employees assigned to Cathodic Protection. The first four employee classifications are System Protection management employees, who would be responsible for program management.

Employee Classification	2009	2010	2011	2012	2013
System Protection Supervisor	3	4	4	3	4
Technical Specialist - I	4	8	6	6	7
Technical Specialist - Corrosion	1				
Project Manager - System Protection					1
Lead System Protection Specialist	10	9	10	10	11
System Protection Planner	2	1	1	2	1
System Protection Specialist	59	56	58	60	59
System Protection Tech	1	1			
Total	80	79	79	81	83

There are no Cathodic Protection Technical Advisors currently in Gas Distribution.

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**SoCalGas Response to Question 7, Continued:**

- b. The tables below show the O&M and capital expenses incurred for Cathodic Protection in the years 2009 – 2013.

The O&M Cathodic Protection expenses can be found on page 31 of Exhibit SCG-04-WP:

Years	Adjusted-Recorded				
	2009	2010	2011	2012	2013
Labor	8,291	6,951	7,045	6,988	7,145
Non-Labor	4,072	3,404	3,631	3,253	3,705
NSE	0	0	0	0	0
<b>Total</b>	<b>12,363</b>	<b>10,355</b>	<b>10,676</b>	<b>10,241</b>	<b>10,851</b>
FTE	108.0	88.2	89.5	86.3	89.2

The Capital Cathodic Protection expenses can be found on page 107 of Exhibit SCG-04-CWP:

Forecast Method		Adjusted Recorded				
Years		2009	2010	2011	2012	2013
Labor	5-YR Average	352	226	152	54	178
Non-Labor	5-YR Average	4,500	3,786	3,628	2,378	3,706
NSE	5-YR Average	0	0	0	0	0
<b>Total</b>		<b>4,852</b>	<b>4,012</b>	<b>3,780</b>	<b>2,432</b>	<b>3,884</b>
FTE	5-YR Average	3.9	2.4	1.6	0.6	1.9

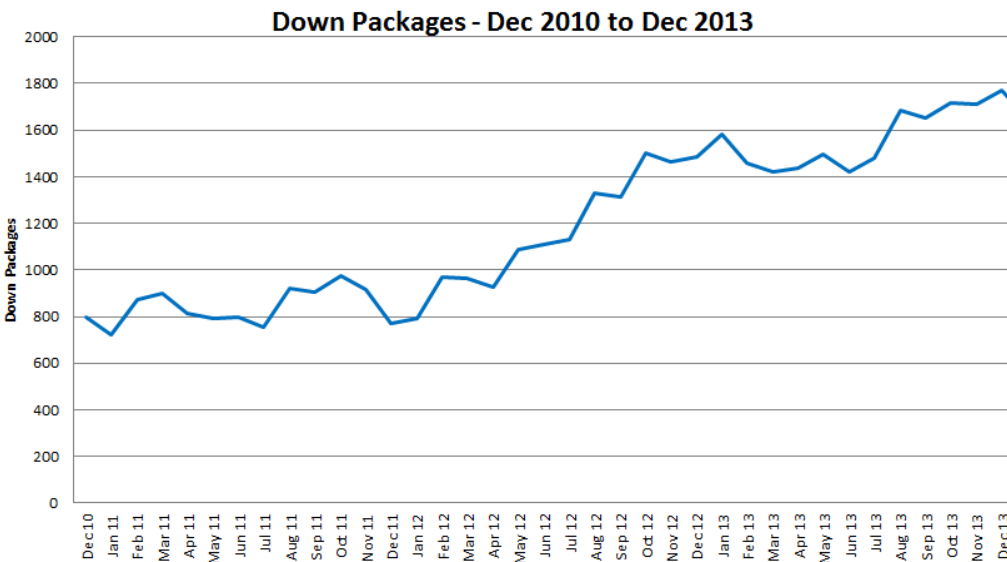
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**SoCalGas Response to Question 7, Continued:**

c. Gas Distribution is experiencing increase incidents of cathodic protection deterioration in certain areas. Gas Distribution looked at the cathodic protection activities that needed additional support, and based on these activities, cathodic protection subject matter experts estimated the number of technical advisors needed to do this work. Incremental activities include:

- Analysis and development of cathodic protection improvement projects.
- Provide ongoing technical support with cathodic protection troubleshooting, understanding how to apply cathodic protection practices, and when to use each of the cathodic protection methods.
- Forecast the number of cathodic protection areas that will need corrective action in the future to bring them within tolerance.
- Forecast the resources required to maintain Gas Distribution cathodic protection systems.
- Run and monitor reports on cathodic protection activities to stay in compliance.
- Perform quality assurance inspections.
- Provide additional training for new cathodic protection employees.
- Evaluate trouble shooting processes, techniques, and tools.

d. SoCalGas’ backlog of pending cathodic protection packages in the Gas Distribution system has been growing in recent years. The chart below shows the historical growth of the cathodic protection package backlog that needs the additional remediation to make the cathodic protection more effective in protecting the pipeline.



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**SoCalGas Response to Question 7.d., Continued:**

Please refer to the data provided in SoCalGas' Master Data Request, Chapter 2, Question 6 for information on the current cathodic protection backlog. The incremental activities described in the response to Question 7.c. above are ongoing activities that will need to be performed in order to help reduce the cathodic protection system backlog and provide technical support to newer employees.

- e. Please refer to the response to Question 7.c. above for a list of incremental activities that will be performed by the cathodic protection technical advisors. These activities will improve cathodic protection processes and techniques and train newer cathodic protection employees. These changes will help Gas Distribution maintain their cathodic protection system and address cathodic protection areas that are out of tolerance more quickly.

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**SoCalGas Response to Question 7, Continued:**

- f. Please refer to the response to Questions 7.c. and 7.e above for a list of incremental activities that will be performed by the cathodic protection technical advisors. These activities will improve cathodic protection processes and techniques and train newer cathodic protection employees. These changes will help Gas Distribution maintain their cathodic protection system and address cathodic protection areas that are out of tolerance more quickly.
- g. Please see information in the table below, showing the number of employees who are eligible to retire in each forecast year.

Employee Classification	Current Employees (As of 4/28/14)	Number of Employees Eligible to Retire			Percentage of Employees Eligible to Retire		
		2014	2015	2016	2014	2015	2016
Lead System Protection Specialist / Planner	13	10	10	10	77%	77%	77%
System Protection Specialist	63	25	27	30	40%	43%	48%

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8. Referring to Field Technology Support discussed on page FBA-66 to FBA-67, please provide a description of how SoCalGas determined that it will specifically need an additional 7 Business System Analysts and 1 Project Manager by 2016 and include a copy of all calculations and supporting documents used to develop this forecast.

**SoCalGas Response:**

Please see the calculations and data provided in the table below.

**Projected CPD ESS Support Workload**

Client Groups	Daily Problems per Client Group	Average Time / Task (minutes)	Total Time per Day (minutes)	Total Time per Day (hours)	FTEs
Planner Associates (71)	10	60	600	10.00	1.3
Field Planning Associates (109)	15	60	900	15.00	1.9
Clerks (90)	5	60	300	5.00	0.6
New Business Accounting (8)	2	30	60	1.00	0.1
<b>Total for Client Groups</b>			<b>1860</b>	<b>31.00</b>	<b>3.9</b>

Application Interface Errors	Daily Count	Average Time / Task (minutes)	Total Time per Day (minutes)	Total Time per Day (hours)	FTEs
SAP-NBMS	5	15	75	1.25	0.2
CLICK-SAP	20	35	700	11.67	1.5
SAP-CLICK	7	20	140	2.33	0.3
GWD-SAP	6	15	90	1.50	0.2
<b>Total for Interface Errors</b>			<b>1005</b>	<b>16.75</b>	<b>2.1</b>

<b>Business Systems Analysts - To Gather and Document Enhancements Requirements</b>	<b>1.0</b>
<b>Project Manager</b>	<b>1.0</b>
<b>GRAND TOTAL</b>	<b>8.0</b>

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9. Please provide a copy of the SoCalGas Operations Audit by CPUC Safety and Enforcement Division cited on page FBA-58, footnote 26.

**SoCalGas Response:**

Please refer to the separately provided document, ORA-SCG-DR-015-DAO\_Q9.pdf.