Exhibit Reference: SCG-23, Testimony and Workpapers SoCalGas Witness: Herrera Subject: Fleet – Maint. Op./Auto Fuel/Maint. Mgt./Shared Fleet Mgt.

Please provide the following:

- 1. Referring to Ex. SCG-23 testimony Pg. CLH-27, please answer/provide the following:
 - a. For maintenance operations the amount requested, amount approved, and actual expenses pursuant to the previous rate case for the period 2014 to 2016.
 - b. For maintenance operations total actual expenses to date for 2017.
 - c. For automotive fuel the amount requested, amount approved, and actual expenses pursuant to the previous rate case for the period 2014 to 2016.
 - d. For automotive fuel total actual expenses to date for 2017.

SoCalGas Response 1:

a. In the 2016 GRC testimony of Carmen Herrera, SCG-15, page CLH-13, SoCalGas requested \$14.477M for TY2016 Maintenance Operations- Vehicle Servicing and repairs costs.

The commission adopted ORA and SoCalGas' joint settlement agreement of \$13.000M for Maintenance Operations – Vehicle Servicing and Repairs. Please refer to Joint Motion for Adoption of Settlement Agreements Regarding Southern California Gas Company's Test Year 2016 General Rate Case, Including attrition Years 2017 and 2018 filed on November 14, 2014, page 139.

Please see workpapers SCG-23 2RF002.000 for actual expenditures for the period 2014 - 2016 in this category.

- **b.** 2017 financial information is expected to be available in late Q1 2018.
- **c.** In the 2016 GRC testimony of Carmen Herrera, SCG-15, page CLH-13, SoCalGas requested \$13.149M for TY2016 Automotive Fuel costs.

The commission adopted ORA and SoCalGas' joint settlement agreement of \$12.400M for Automotive Fuel. Please refer to Joint Motion for Adoption of Settlement Agreements Regarding Southern California Gas Company's Test Year 2016 General Rate Case, Including attrition Years 2017 and 2018 filed on November 14, 2014, page 140.

SoCalGas Response 1:-Continued

Please see workpapers SCG-23 2RF002.001 for actual expenditures for the period 2014 - 2016 in this category.

d. 2017 financial information is expected to be available in late Q1 2018.

2. Referring to Ex. SCG-23 fleet workpapers pg. 44, for maintenance operations there is an adjustment of \$863,000 for each of the forecast years 2017-2019 related to backfilling of positions related to retirements. Based on this, please answer/provide the following:

- a. Have the positions been filled as of the date of this request? If no, explain why not. If yes, provide the actual cost of filling each of the positions.
- b. When did each of the employees retire?
- c. How long did each of the positions go unfilled?
- d. Were the costs of the employees reflected in the last rate case period (2014-2016)? If no, then why were the costs not reflected?

SoCalGas Response 2:

- **a.** As explained in the Master Data Request (Company Specific Requirements Q5), SoCalGas does not track vacancy levels. SoCalGas' labor forecasting is done through full-time equivalents, rather than by identifying individuals and/or potential replacement personnel. 2017 financial and associated FTE information is expected to be available in late Q1 2018.
- b. Since the GRC forecast is based on FTEs, rather than headcount, retirements and backfill information were not used to derive the GRC forecast. There have been a variety of retirements and employee turnover in Maintenance Operations dating back to 2012, with an average net reduction of 3.06 FTEs per year and a total net reduction of 15.3 Maintenance Operations FTEs for the period of 2012 2016.
- **c.** SoCalGas does not track this information. The GRC forecast is based on FTEs, rather than headcount, and the duration of unfilled positions was not used to prepare GRC forecasts.
- d. Yes.

3. Referring to Ex. SCG-23 fleet workpapers pg. 49, for automotive fuel there are adjustments of \$156,000, \$465,000, and \$709,000 for the forecast years 2017-2019 respectively related to costs related to incremental fuel costs. Based on this, please answer/provide the following:

- a. For the 143, 138, and 38 additional incremental vehicles added in the forecast years 2017 to 2019 respectively, provide a listing of the vehicles by year, make, and model, and the expected increase in cost per vehicle for incremental additional fuel usage that ties to the forecasted adjustments.
- b. Why do costs go up for fuel usage from 2017 to 2018 yet the number of vehicles decreases (143 to 138) and the costs increase from a forecasted \$156,000 to a forecasted \$465,000?
- c. Why do costs go up for fuel usage from 2018 to 2019 yet the number of vehicles decreases (138 to 38) and the costs increase from a forecasted \$465,000 to a forecasted \$709,000?
- d. For the 143 incremental vehicles added in 2017, provide their actual automotive fuel costs to date.

SoCalGas Response 3:

a. The fuel cost estimate for incremental vehicles is based on utilizing the average gallons used per vehicle in 2016 multiplied by a Global Insights estimated price per gallon in each year. The table below represents the incremental fuel cost estimate by vehicle type and year.

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SoCalGas Vehicle Types Incremental Vehicle Additions				
VEHICLE TYPES	2017	2018	2019	
1. AUTOMOBILES		(7)		
2. COMPACT TRUCK & VANS	5	4	2	
3. LIGHT TRUCK & VANS	77	105	11	
4. MEDIUM DUTY TRUCK	58	35	23	
5. HEAVY DUTY TRUCK		1	2	
6. MECHANIZED TRAILER	1			
7. NON MECHANIZED TRAILER				
8. P.O.E. / M.W.E.	2			
Total Incremental	143	138	38	

SoCalGas Vehicle Types Incremental Vehicle Fuel Costs				
VEHICLE TYPES	2017	2018	2019	
1. AUTOMOBILES	\$ -	\$ (7,691)	\$ (16,529)	
2. COMPACT TRUCK & VANS	\$ 5,474	\$ 15,382	\$ 23,613	
3. LIGHT TRUCK & VANS	\$ 84,294	\$ 284,571	\$ 442,745	
4. MEDIUM DUTY TRUCK	\$ 63,494	\$ 165,908	\$ 246,757	
5. HEAVY DUTY TRUCK	\$ -	\$ 1,099	\$ 4,723	
6. MECHANIZED TRAILER	\$ 1,095	\$ 2,197	\$ 2,361	
7. NON MECHANIZED TRAILER	\$ -	\$ -	\$ -	
8. P.O.E. / M.W.E.	\$ 2,189	\$ 4,395	\$ 4,723	
Total Incremental	\$ 156,545	\$ 465,862	\$ 708,392	

SoCalGas Response 3:-Continued

- b. The number represented in the incremental vehicle field is incremental from the previous year (cumulative). The data represents an increase of 143 vehicles in 2017, an increase of 138 vehicles in 2018 plus the 2017 additions, and an increase of 38 vehicles in 2019 plus the 2018 additions and the 2017 additions. Total incremental vehicles are 143 + 138 + 38 = 319 incremental vehicles over the forecast period.
- c. See 3b above.
- d. 2017 financial information is expected to be available in late Q1 2018.

4. Referring to Ex. SCG-23 fleet workpapers pg. 56, for maintenance management there is an adjustment of \$411,000 for each of the forecast years 2017-2019 related to backfilling of positions related to retirements. Based on this, please answer/provide the following:

- a. Have the positions been filled as of the date of this request? If no, explain why not. If yes, provide the actual cost of filling the positions.
- b. When did each of the employees retire?
- c. How long did each of the positions go unfilled?
- d. Were the costs of the employees reflected in the last rate case period (2014-2016)? If no, then why were the costs not reflected?

SoCalGas Response 4:

- **a.** As explained in the Master Data Request (Company Specific Requirements Q5), SoCalGas does not track vacancy levels. SoCalGas' labor forecasting is done through full-time equivalents, rather than by identifying individuals and/or potential replacement personnel. 2017 financial and associated FTE information is expected to be available in late Q1 2018.
- **b.** Since the GRC forecast is based on FTEs, rather than headcount, retirements and backfill information were not used to derive the GRC forecast. There have been a variety of retirements and employee turnover in Maintenance Management dating back to 2012, with an average net reduction of 0.92 FTEs per year and a total net reduction of 4.6 Maintenance Management FTEs for the period of 2012 2016.
- **c.** SoCalGas does not track this information. The GRC forecast is based on FTEs, rather than headcount, and the duration of unfilled positions was not used to prepare GRC forecasts.
- d. Yes.

5. Referring to Ex. SCG-23 fleet workpapers pg. 86, for shared fleet management there is an adjustment of \$494,000 for each of the forecast years 2018-2019 related to backfilling of 2 positions, adding a trainer to support SMOG, one for maintenance trainer, and one for compliance specialist. Based on this, please answer/provide the following:

- a. Have the positions been filled as of the date of this request for the backfill positions and trainer for SMOG? If no, explain why not. If yes, provide the actual cost of filling each of the positions.
- b. How long did each of the positions go unfilled?
- c. Why are the SMOG trainer costs considered recurring into the 2019 test year?
- d. Why are the maintenance trainer, and the compliance specialist needed? And why can't SCG's current staff handle the current workload?

SoCalGas Response 5:

- a. As explained in the Master Data Request (Company Specific Requirements Q5), SoCalGas does not track vacancy levels. SoCalGas' labor forecasting is done through full-time equivalents, rather than by identifying individuals and/or potential replacement personnel. 2017 financial and associated FTE information is expected to be available in late Q1 2018.
- b. SoCalGas does not track this information. The GRC forecast is based on FTEs, rather than headcount, and the duration of unfilled positions was not used to prepare GRC forecasts.
- **c.** The SMOG trainer is expected to train all Fleet technicians to pass the licensing exam as well as train new staff; Additionally, there are periodic recertification requirements to maintain an active SMOG license.
- **d.** The maintenance trainer is needed to keep up with automotive advances and increase the workforce skillsets on safely working on company vehicles, inclusive of new vehicle technology, diagnostics, Alternative Fuel Technology (AFV), brake systems, lighting, etc. The current training staff is undersized to adequately support the training needs of the size workforce and vast geographical territory.

SoCalGas Response 5:-Continued

The compliance specialist is needed to keep up with the newly revised State BIT program (Basic Inspection of Terminals) and increased vehicle compliance requirements going into effect for lower GVW units (from 26,000 GVW down to 10,000 GVW), including providing guidance, documentation, and testing of fleet vehicles for compliance with local, state, and federal guidelines, regulations, laws, and mandates. The current staff is undersized to adequately support the service territory and new requirements.