SOCALGAS 2019 GRC – A.17-10-008 SOCALGAS RESPONSE

DATE RECEIVED: DECEMBER 13, 2017 DATE RESPONDED: JANUARY 12, 2018

Exhibit Reference: SCG-04, SCG-18, and SCG-23

SCG Witness: Gina Orozco-Mejia, Gwen Marelli, and Ms. Herrera

Subject: Field Operations & Maintenance, Service Maintenance Expenses

Please provide the following:

1.Referring to SCG's testimony, pages GOM-56 to GOM-62, please provide the following:

a) A copy of the service leak evaluation procedures;

b)The number of crew trucks assigned/allocated to Service Maintenance each year from 2012-2017 YTD and the number of crew trucks currently in use; and

c)A copy of the calculations and workpapers used to determine the three incremental crew trucks in 2017, 2018, and one in 2019 as stated on page GOM-58, line 20.

SoCalGas Response 1:

- a) Please see the accompanying files "223.0125 Leakage Classification and Mitigation Schedules (Redacted).pdf" and "184.0245 Leak Investigation Distribution (Redacted).pdf" for the Company Gas Standards describing the service leak evaluation procedures. The accompanying attachments have been redacted to remove non-responsive, non-relevant employee information.
- b) There are no crew trucks assigned specifically to Service Maintenance activities. Crew trucks are assigned to each facility based on the number of employees and work function per base location. Please see the number of crew trucks below assigned to Gas Distribution from 2012 2017 YTD (November 30th):

Crew Trucks (2012 – 2017 YTD)										
	2012 2013 2014 2015 2016 2017									
Vehicles	206	227	276	264	262	280				

c) SoCalGas determined the incremental crew trucks in 2017, 2018, and 2019 based on the historical straight time FTEs from 2012 – 2016 under the service maintenance workbook and the forecasted amount of FTEs (2017 – 2019) from the service maintenance methodology forecast. The percentage of straight time under service maintenance work was multiplied by the forecasted FTEs to determine a headcount. The headcount increase for each year was used to determine the number of vehicles needed utilizing a two-headcount per vehicle ratio for heavy-duty vehicles. Based on this methodology, SoCalGas forecasted six incremental heads in 2017, two in 2018, and three in 2019. Applying the headcount to vehicle ratio provided the forecast for the number of vehicles

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needed as mentioned in GOM-58, line 20, three incremental crew trucks in 2017, one in 2018, and one in 2019.

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2. Referring to SCG's testimony page GOM-58, lines 27-28, please provide a copy of the program scope of the meter set assembly (MSA) inspection program to comply with atmospheric corrosion code requirements as mentioned.

SoCalGas Response 2:

The MSA Inspection Program is discussed in the testimony of Gwen Marelli, Exhibit SCG-18, Section III.B.5. As indicated in Ex. SCG-18, the Customer Service Field (CS-F) MSA Inspection Organization performs physical, onsite inspections of each MSA to comply with DOT-required MSA inspections for atmospheric corrosion to identify conditions which require remediation by CS-F and Distribution field employees, and to contact customers to resolve meter access issues. This section further describes the activities of this group and incremental funding requested by CS-F to perform the various activities. Additionally, please refer to the file labeled "SCG-18-WP_Supplemental_2FC005.000_1-6.xlsx" which was included as native Supplemental Workpaper 1 for Workpaper 2FC005.000 in Exhibit SCG-18-WP and sent to ORA on October 30, 2017. This native Supplemental Workpaper shows the order volume forecast and cost calculations for the MSA Inspection Program activities.

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- **3.** Referring to SCG's workpapers pages 73 and 74, please provide the following:
 - a.A copy of all calculations and supporting documents SCG used to determine 1,500 MSA maintenance orders in 2017, 3,000 in 2018, and 8,500 in TY2019;
 - b.The number of MSA maintenance orders completed and expenses incurred each year from 2012-2017YTD for Gas Distribution O&M;
 - c.The number of meter guard orders completed and expenses incurred each year from 2012-2017YTD;
 - d.A copy of the calculations and supporting documents SCG used to determine the 500 meter guard maintenance orders in 2017, 1,000 in 2018, and 3,500 in TY 2019;
 - e.The number of chronically inaccessible MSA's-disconnect services- completed and expenses incurred each year from 2012-2017YTD.
 - f.Regarding the statement, "This effort will begin in 2018 by addressing approximately 364 services in 2018 and 709 in TY 2019":
 - i.Please provide a copy of all calculations and supporting documents used to derive the forecasted number of services to be cut and cap in 2018 and 2019; and
 - ii. How does SCG currently treat and account for the work activities regarding chronically inaccessible MSA's?
 - iii.Is the proposed work for Gas Distribution crews to cut and cap the gas service line at the service to main connection a new work procedure beginning in 2018?
 - iv. What was the SCG procedure for chronically inaccessible MSAs from 2012-2016?

SoCalGas Response 3:

- 3.a. SoCalGas has an inventory of MSA maintenance orders due to an increase in the number of inspections completed by the Customer Service team, as discussed in the testimony of Witness Gwen Marelli (Exhibit SCG-18). SoCalGas plans to reduce this inventory by half during the next three years. SoCalGas forecasted ramping up this effort starting with 1,500 MSA maintenance orders in 2017, 3,000 in 2018, and 8,500 in TY 2019.
- 3.b. Please see below the number of MSA maintenance orders completed and expenses incurred each year from 2012-2017 YTD*:

	MSA Maintenance Orders (2012 - 2017 YTD)											
	2012 2013 2014 2015 2016 201								2017			
Expenses	\$	4,659,855	\$	4,233,916	\$	4,585,740	\$	4,173,110	\$	3,914,553	\$	3,756,558
Orders	Orders 20,724 21,238 22,913 20,149 20,078 17,376										17,376	

^{* 2017} YTD includes work completed through November 30, 2017.

3.c. Please see below the number of meter guard orders completed and expenses incurred each year from 2012-2017 YTD.* These are orders completed to replace meter guards and the cost is recorded under Operations & Maintenance (O&M). Costs for new meter guard installations are recorded as a Capital expense.

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Meter Guard Orders (2012 - 2017 YTD)												
	2012 2013 2014 2015 2016 20								2017			
Expenses	\$	19,225	\$	8,214	\$	37,529	\$	39,852	\$	48,327	\$	23,215
Orders												

^{* 2017} YTD includes work completed through November 30, 2017.

- 3.d. SoCalGas has an inventory of Meter Guard orders due to an increase in the number of MSA inspections completed by the Customer Service team, as discussed in the testimony of Witness Gwen Marelli (Exhibit SCG-18). SoCalGas plans to reduce this inventory by half during the next three years. SoCalGas forecasted ramping up this effort starting with 500 Meter Guard orders in 2017, 1,500 in 2018, and 3,000 TY 2019.
- 3.e. SoCalGas Distribution has not tracked the historical expenses specifically associated with chronically inaccessible MSAs. Costs for this type of activity would have been tracked in the overall Service Maintenance category. SoCalGas has rarely used this service disconnection process in the past. The forecast included in testimony is to increase the number of service disconnections. During this process, SoCalGas distribution crews will shut off a chronically inaccessible MSA by cutting the service in the street and installing a valve. Once the MSA has been accessed and inspected, service can be restored at the valve.
- 3.f. Below are the responses for each of the questions in 3.f.
 - 3.f.i. Please refer to the accompanying file labeled "ORA-SCG-049-DAO-Q3-f-i Attachment.xlsx" which shows the calculation to derive the number of services to be isolated in 2018 and 2019.
 - 3.f.ii. Please refer to response to Question 2 for information on the MSA Inspection Program activities which includes work activities associated with chronically inaccessible MSAs. The MSA Inspection Representative (MIR) is required to physically get access to the meter to perform a comprehensive inspection of the MSA. In most cases, the MIR is able to gain access to the meter and complete the inspection. However, in certain situations, the MIR is unable to complete the inspection due to access issues, so the employee leaves a CGI (Can't Get In) tag at the premises informing the customer to contact the CS-F MSA Inspection Organization's toll-free number to schedule the inspection. The CS-F MSA Inspection Organization makes multiple attempts by phone and letters to schedule an appointment with the customer, as well as several field visits, in an effort to gain access to the MSA to complete the inspection. When these attempts fail, the last and final step in the process is to refer the facility with the chronically inaccessible MSA to Gas Distribution to discontinue service at the street.

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- 3.f.iii. The proposed work for Gas Distribution crews to cut and cap the gas service line at the service to main connection is not a new work procedure, however, it is not frequently used.
- 3.f.iv. SCG's procedure for chronically inaccessible MSAs handled by Customer Services Field from 2012 2016 included performing multiple field visits to attempt to gain access to the MSA, leaving notices at the facility location for customers to contact SCG to make arrangements to gain access to the meter, making multiple calls, and sending letters to customers to arrange for access.

SoCalGas' Gas Distribution follows the same procedure for MSAs maintained and inspected by M&R, however when multiple calls and letters to customers are not answered, an Account Executive is consulted. They confirm that there is no contact with the customer, or if business has been suspended, before considering cutting and capping the service.

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- 4. Has SCG previously allocated/assigned expenses for MSA maintenance to Customer Services, Field Meter Reading? If so, please provide the number of completed orders and expenses incurred each year from 2012-2017YTD for:
 - a. MSA maintenance,
 - b. meter guards maintenance, and
 - c. chronically inaccessible MSA's—Disconnect Services.

SoCalGas Response 4:

4.a. MSA maintenance activities for Customer Services Field (CS-F) refer to any maintenance work performed by CS-F employees at the MSA. These activities are separate and distinct from the MSA maintenance work performed by Gas Distribution.

CS-F Operations costs are primarily driven by work order volumes which are tracked and broken down by each order type, as discussed in the testimony of Gwen Marelli, Exhibit SCG-18, Section III.B.1. A description of each order type is included as Appendix B of Ex. SCG-18. The order types shown in Table 4.a below reflecting the number of completed orders from 2012 – Nov 2017 YTD may include MSA maintenance activities in addition to other customer service work.

SCG is unable to provide CS-F expenses incurred each year from 2012 – 2017 YTD for the order types listed in Table 4.a because expenses are not tracked at the level of detail to conduct such analysis. However, to provide some estimate of costs, the 2016 estimated cost is included in Table 4.a, which represents estimated labor and non-labor costs associated with the 2016 order volume. The 2016 estimated cost is also provided in Exhibit SCG-18-WP, SCG-18-WP – 2FC001 CS – Field Operations, Supplemental Workpaper 1.

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Table 4.a: 2012 – Nov 2017 YTD Order Volume by Order Type & 2016 Estimated Cost

Line			Historic	cal Actual \	/olume		Nov 2017	2016	
No.	Order Type	2012	2013	2014	2015	2016	YTD Volume	Estimated Cost ²	
1	Customer Service Order (CSO)	257,830	248,483	216,006	192,254	199,468	191,973	\$ 8,612,986	
2	Gas Leak - CSO Leak	258,472	268,475	271,614	296,674	269,460	229,086	\$ 13,412,239	
3	Gas Leak - Leak Investigation (Step2)	10,797	12,543	11,841	13,068	13,256	12,634	\$ 1,102,342	
4	Meter Work (O&M) - Meter Change (Entered) ¹	6,415	3,786	6,282	5,093	3,935	2,610	\$ 382,399	
5	Meter Work (O&M) - Meter Change (Not Entered) ¹	104,655	64,406	69,854	58,432	45,444	32,846	\$ 3,236,050	
6	Meter Work (O&M) - Meter Change (Size) ¹	5,096	5,498	5,757	5,534	5,970	5,871	\$ 663,279	
7	Miscellaneous - Service Order (MSO)	23,753	28,469	29,808	42,314	50,438	40,434	\$ 2,305,334	
8	Miscellaneous - Meter & Reg (MMR) ¹	51,665	30,916	39,052	63,695	73,100	117,586	\$ 3,683,099	
9	Miscellaneous – Assist	13,914	15,165	17,080	16,167	25,482	24,509	\$ 1,660,691	
	Total	732,597	677,741	667,294	693,231	686,553	657,549	\$ 35,058,421	

¹ These order types include MSA maintenance work activities exclusively. All other order types may or may not include MSA maintenance work.

- 4.b. CS-F employees do not perform meter guard maintenance work, and SCG does not have any expenses previously allocated to Customer Services Field for meter guard maintenance. This work is performed by Gas Distribution.
- 4.c. CS-F employees do not perform chronically inaccessible MSA disconnect services (i.e., cut and cap the gas service line at the service to main connection), and SCG does not

² Actual costs are not tracked at the order type level; therefore, 2016 costs are estimated costs associated with the 2016 order volume. The 2016 estimated costs include the labor and associated non-labor costs for CS-F technicians who perform customer service work. This information is also provided in Exhibit SCG-18-WP, SCG-18-WP – 2FC001 CS – Field Operations, Supplemental Workpaper 1.

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have any expenses previously allocated to Customer Services - Field for chronically inaccessible MSAs – Disconnect Services. This work is performed by Gas Distribution.

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5.Referring to SCG's testimony, page GOM-59, lines 22 to 24, please provide the following information:

- a.A copy of all calculations and supporting documents SCG used to determine the need for 3 additional heavy-duty trucks in 2018 and five in TY 2019; and
- b.The number of heavy-duty trucks and the corresponding expenses allocated specifically for MSA maintenance work activities each year from 2012-2017YTD.

SoCalGas Response 5:

- a. SoCalGas determined the incremental crew trucks in 2018 and 2019 based on the historical straight time FTEs from 2012 2016 under the service maintenance workbook and the forecasted amount of FTEs (2017 2019) for the incremental activities related to MSA maintenance. The percentage of straight time under service maintenance work was multiplied by the forecasted FTEs to determine a headcount. The headcount increase for each year was used to determine the number of vehicles needed utilizing a two-headcount per vehicle ratio for heavy-duty vehicles. Based on this methodology, SoCalGas forecasted six incremental heads in 2018 and 10 in 2019. Applying the headcount to vehicle ratio provided the forecast for the number of vehicles needed, as mentioned in GOM-59, lines 22-24. SoCalGas forecasted three incremental heavy-duty trucks in 2018 and five in TY 2019.
- b. There are no heavy-duty trucks assigned specifically to MSA maintenance work activities. Heavy-duty trucks are assigned to each facility based on the number of employees and work function per base location. Please see the number of crew trucks below assigned to Gas Distribution from 2012 2017 YTD (November 30^{th}):

Heavy-Duty Trucks (2012 – 2017 YTD)										
	2012 2013 2014 2015 2016 2017									
Vehicles	206	227	276	264	262	280				

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6.Referring to SCG's testimony, page GOM-60, lines 8 to 10, please provide the following information:

- a.A copy of all calculations and supporting documents SCG used to determine the need for one additional heavy-duty trucks in 2018 and four in TY 2019; and
- b. The number of heavy-duty trucks and the corresponding expenses allocated specifically for meter guard maintenance work activities each year from 2012-2017YTD.

SoCalGas Response 6:

- a. SoCalGas determined the incremental crew trucks in 2018 and 2019 based on the historical straight time FTEs from 2012 2016 under the service maintenance workbook and the forecasted amount of FTEs (2017 2019) for the incremental activities related to meter guard activities. The percentage of straight time under service maintenance work was multiplied by the forecasted FTEs to determine a headcount. The headcount increase for each year is used to determine the number of vehicles needed utilizing a two-headcount per vehicle ratio for heavy duty vehicles. Based on this methodology, SoCalGas forecasted two incremental heads in 2018 and eight in 2019. Applying the headcount to vehicle ratio provided the forecast for the number of vehicles needed, as mentioned in GOM-60, lines 8-10.
- b. There are no heavy-duty trucks assigned specifically to meter guard maintenance work activities. Heavy-duty trucks are assigned to each facility based on the number of employees and work function per base location. Please see the number of heavy-duty trucks below assigned to Gas Distribution from 2012 2017 YTD (November 30^{th}):

Heavy Duty (2012 – 2017 YTD)										
2012 2013 2014 2015 2016 2017										
Vehicles	206	227	276	264	262	280				

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7.Referring to SCG's testimony, page GOM-60, lines 24 to 26, please provide the following information:

- a. A copy of all calculations and supporting documents SCG used to determine the need for 3 additional heavy-duty trucks in 2018 and 3 in TY 2019; and
- b.The number of heavy-duty trucks and the corresponding expenses allocated specifically for chronically inaccessible MSA's-disconnect services each year from 2012-2017YTD.

SoCalGas Response 7

- a. SoCalGas determined the incremental crew trucks in 2018 and 2019 based on the historical straight time FTEs from 2012-2016 under the service maintenance workbook and the forecasted amount of FTEs (2017-2019) for the incremental activities related to chronically inaccessible MSAs disconnect services. The percentage of straight time under service maintenance work was multiplied by the forecasted FTEs to determine a headcount. The headcount increase for each year was used to determine the number of vehicles needed utilizing a two-headcount per vehicle ratio for heavy-duty vehicles. Based on this methodology, SoCalGas forecasted six incremental heads in 2018 and six in 2019. Applying the headcount to vehicle ratio provided the forecast for the number of vehicles needed, as mentioned in GOM-60, lines 24-26.
- b. There are no heavy-duty trucks assigned specifically to meter guard maintenance work activities. Heavy-duty trucks are assigned to each facility based on the number of employees and work function per base location. Please see the number of heavy-duty trucks below assigned to Gas Distribution from 2012 2017 YTD (November 30^{th}):

Heavy Duty (2012 – 2017 YTD)										
2012 2013 2014 2015 2016 2017										
Vehicles	206	227	276	264	262	280				