

**ORA DATA REQUEST**  
**ORA-SDG&E-DR-025-SWC**  
**SDG&E 2016 GRC – A.14-11-003**  
**SDG&E RESPONSE**  
**DATE RECEIVED: DECEMBER 16, 2014**  
**DATE RESPONDED: DECEMBER 30, 2014**

**Exhibit Reference:** SDG&E-18

**Subject:** Environmental Services

**Please provide the following:**

1. In Exhibit SDG&E-18, page RSP-5, lines 4 to 7, SDG&E states, “The upward financial pressures identified in this cost category (\$268K) are for labor adjustments for full-year funding (+2.4 FTEs) and non-labor costs for water quality permit fee increases and for applications for herbicide use on Bureau of Land Management (BLM) lands in support of SDG&E’s pole brushing activities.”
  - a. Provide the job descriptions and salaries of those 2.4 FTEs and the dates the positions were filled.
  - b. Provide the average annual number of FTEs working in SDG&E’s Environmental Compliance cost category during 2009 to year-to-date 2014.

**SDG&E Response 01:**

- a. *Provide the job descriptions and salaries of those 2.4 FTEs and the dates the positions were filled.*

The 2.4 FTE adjustment is a combination of transfers and labor adjustments as described below. For the non-shared services cost centers, the labor adjustment totals \$162k and consists of:

1. Interdepartmental transfer:
  - a. Transfer of one Hazardous Materials Assistant from 2100-0206 in the estimated amount of \$43k to cost center 1EV000.000. There is a reduction of (\$43k) as part of the total labor downward adjustment of (\$222k) in cost center 2100-0206. This employee was moved within the Environmental Services department from one cost center to another. See SDG&E-18-WP, pages 55 and 56 of 132.
2. Various Leaves and Vacancies for net labor adjustment:
  - a. One Environmental Specialist transferred out Environmental Services department in August of 2013. The replacement was hired in February of 2014
  - b. Medical leave for one Hazardous Materials Assistant from 2100-0190 during March & April of 2013

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- c. Medical leave for one Hazardous Substance Specialist from Oct 2013 thru Jan 2014
  - d. Medical/FMLA leave for one Environmental Operations Assistant for 2013 thru April 2014
  - e. Two Hazardous Substance Specialists [Represented Employees] retired in July and in August of 2013. Replacements were managed through promotions of existing employees creating vacancies for Entry Level Environmental Operations Assistants who were hired in September and October of 2013.
3. Annual salary (excluding vacation and sick leave) for positions noted above are:
- a. Hazardous Materials Assistant position = \$43k
  - b. Hazardous Substance Specialist = \$63k
  - c. Environmental Specialist = \$64k
  - d. Entry Level Environmental Ops Assistants = \$40k
4. Job Descriptions:
- a. Hazardous Materials Assistant: Planning of Daily electronic HazMat (HM) Service Jobs Requests for Next day ER Vendor scheduling/coverage; Real time HM Crew & Emergency Response (ER) vendor Dispatching and redeployment as needed; scheduling Weekend and Afterhours OT Jobs & any Claim's Info requests; Timely ER & Disposal Vendor Invoice processing; HazMat Phone Line Coverage; Union Timekeeper for HM Crews; California Highway Patrol BIT Inspections/Driver Logs reviews; Support processing of Vendor Contracts; TSDf Manifests & Bills of Lading Records Management; ER Vendor Communication & special notices; and other duties as assigned.
  - b. Hazardous Substance Specialist: Handle (includes clean-up), package, sample, ship, store, load, unload hazardous materials and waste in accordance with governing law; respond to both emergency and non-emergency clean-up of spills of hazardous materials and waste on a 24-hour basis; perform other related duties as assigned or required.

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- c. Environmental Specialist: Ensure environmental compliance for assigned clients and client’s geographic and functional responsibilities by: Advising and assisting site management in all matters related to air, waste water, storm water, and hazmat/waste compliance; Managing and maintaining site air, waste water, storm water, and hazmat/waste permits, plans, procedures, company standards, and regulations; Maintaining and submitting air, waste water, storm water, and hazmat/waste reports and data as required by site permits, plans, or regulations; Managing site permits, air, waste water, storm water, and hazmat/waste monitoring and sampling/testing requirements; Managing and providing air, waste water, storm water, and hazmat/waste compliance training as required; Representing clients in air, waste water, storm water, and hazmat/waste matters as required for construction projects, regulatory inspections, etc.; and, Responding to and reporting breakdowns, upsets, and/or hazmat/waste spills as required by permits, plans, or regulations.
  
- d. Environmental Operations Assistant: Assists Hazardous Substance Specialist or Hazardous Material Technician with the handling, clean-up, package, sample, ship, store, load, unload non-hazardous and hazardous materials and waste in accordance with governing laws. Responds with a Hazardous Substance Specialist to both emergency and non-emergency clean-up of spills on a 24-hour basis. Retrieves samples of hazardous materials, properly labels containers and completes sampling documents. Prepares other reports or documents as required, perform other related duties as assigned.

b. *Provide the average annual number of FTEs working in SDG&E’s Environmental Compliance cost category during 2009 to year-to-date 2014.*

<b>Year</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Thru Nov 2014</b>
<b>FTEs</b>	20.4	19.7	20.2	19.3	20.2	20.2

**Average employees per year = 20.0**

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2. In Exhibit SDG&E-18-WP, page 21, SDG&E's supplemental workpaper shows costs for the Environmental Assessments, Biological Resource Report, and Cultural Resource Report that are necessary to obtain a Pesticide Use Permit. SDG&E anticipates that one Pesticide Use Permit application will be filed in 2015 for the El Centro district and one application in 2016 for the Palm Springs district.
  - a. How often (i.e., annually, one-time, every two years, etc.) does the Bureau of Land Management require SDG&E to perform the Environmental Assessments, Biological Resource Report, and Cultural Resource Report for the Pesticide Use Permit? Provide supporting documentation from the Bureau of Land Management.
  - b. Explain why the Environmental Assessments, Biological Resource Report, and Cultural Resource Report are recurring expenses.

**SDG&E Response 02:**

The Bureau of Land Management (BLM) issues Pesticide Use Proposals (PUP) for a duration of three years from the approval date based on other PUPs issued by BLM within and outside the State of California. SDG&E expects to be required to renew the PUP after the three year duration which will include an environmental analysis to verify that conditions are consistent with the original analysis and/or include new areas for treatment due to system upgrades.

See attachment ORA SDG&E DR 025 Q2.pdf

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3. In Exhibit SDG&E-18, page RSP-14, lines 13 to 20, SDG&E breaks down the components of the proposed \$404,000 increase for the Environmental Program cost category.
- a. Provide the average annual number of FTEs working in SDG&E’s Environmental Programs cost category during 2009 to year-to-date 2014.
  - b. Provide the job descriptions and salaries of the proposed increase in FTEs and the date the positions were filled.
  - c. Provide the date that SDG&E started work on the State Water Resources Control Board (SWRCB) Industrial Stormwater Permit Update.
  - d. How long does SDG&E anticipate the SWRCB Industrial Stormwater Permit Update work to take? Provide anticipated completion date.
  - e. Explain why the SWRCB Industrial Stormwater Permit Update work is a recurring expense.
  - f. Provide the date that SDG&E started work on the State Water Resources Control Board Programmatic 401 Certification for Linear Projects.
  - g. How long does SDG&E anticipate the work on the State Water Resources Control Board Programmatic 401 Certification for Linear Projects to take? Provide the anticipated completion date.
  - h. Explain why the State Water Resources Control Board Programmatic 401 Certification for Linear Projects is a recurring expense.
  - i. Provide the date that SDG&E started work on the Vault De-watering Permit Renewal.
  - j. How long does SDG&E anticipate the Vault De-watering Permit Renewal work to take? Provide anticipated completion date.
  - k. Explain why the Vault De-watering Permit Renewal work is a recurring expense.
  - l. Provide the date that SDG&E started work on the Greenhouse Gas Reporting Support.
  - m. How long does SDG&E anticipate the Greenhouse Gas Reporting Support work to take? Provide anticipated completion date.
  - n. Explain why the Greenhouse Gas Report Support work is a recurring expense.

**SDG&E Response 03:**

- a. *Provide the average annual number of FTEs working in SDG&E’s Environmental Programs cost category during 2009 to year-to-date 2014.*

<b>Year</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Thru Nov 2014</b>
<b>FTEs</b>	10.2	10.3	8.3	10.0	9.2	10.8

**Average employees per year = 9.8**

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**SDG&E Response 03:-Continued**

- b. *Provide the job descriptions and salaries of the proposed increase in FTEs and the date the positions were filled.*

The 2.0 FTE adjustment is a combination of transfers and labor adjustments for the positions as described below. For the shared services cost center of 2100-3022, the labor adjustment totals \$166k and consists of:

1. Interdepartmental transfer:
  - a. Transfer of two employees, one Senior Hazardous Materials Specialist from 2100-0206 (salary transfer \$73k) and one Team Lead (salary transfer \$106k) to 2100-3022. There is a reduction of (\$179k) as part of the total labor downward adjustment of (\$222k) in cost center 2100-0206. These employees were moved within the department from one cost center to another. See SDG&E-18-WP, pages 55 and 56 of 132.
2. Various Leaves and Vacancies for net labor adjustment:
  - a. Additionally for cost center 2100-3022, there is a reduction of (\$32k) to remove the salary of the Program Manager who was replaced by the Team Lead's promotion/transfer.
  - b. One Team Lead Position was open in March 2013 and filled in November 2013
  - c. One Principal Environmental Specialist position was open as of January 2013 and filled with existing staff creating an Environmental Specialist position filled in May 2014
3. Annual salary (excluding vacation and sick leave) for positions noted above are:
  - a. Senior Environmental Specialist position = \$73k
  - b. Team Lead position = \$106k
  - c. Environmental Specialist = \$65k

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4. Job Descriptions:
  - a. Senior Environmental Specialist: Provides a high level of environmental expertise to internal clients, peers and all levels of management. Manages multiple specific discipline projects. Conducts and oversees complex analysis of the potential effects of existing and proposed company operations on the environment. Advocates the company position at government agencies to provide flexibility to company operations in meeting environmental requirements. Routinely, identifies, analyzes and interprets regulatory requirements affecting company operations in order to develop; Strategies to mitigate the impact to company operations, Advocacy packages for use in lobbying company positions; Compliance programs/procedures/tools to ensure compliant operations; and, Strategic plans to support business objectives.
  - b. Team Lead – HazMat Tech Support: Direct and manage the Hazardous Materials & Waste Technical Support Team's development of HazMat/Waste environmental compliance requirements. Supervises a team of technical experts in assessing environmental laws and regulations, providing environmental advice and support to ensure SEU Clients are in compliance with all applicable federal, state, and local environmental laws and regulations and applicable company policies. Provide for the development of a highly technical staff of environmental consultants and specialists. Develop, direct, motivate, and evaluate performance of individual team members.

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- c. Environmental Specialist: Provide environmental project management and support for Company projects. Projects include modifications to existing Company facilities/infrastructure and construction of new capital projects such as electric transmission, substation, and gas transmission projects. Primary focus is compliance with the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and other permit requirements through various regulatory agencies including, but not limited to, the California Public Utilities Commission (CPUC), Bureau of Land Management (BLM), California Coastal Commission (CCC), and local jurisdictions. Responsible for coordination of the contractor selection process and management of environmental contractors. Duties include development of a permitting strategy, budget, and schedule. Coordinates with internal multi-discipline/cross functional experts (biologist, archeologists, etc.) to collect and analyze environmental technical documents. Other duties include review and comment of local land use policy documents and land use development proposals to analyze impacts on Company infrastructure and facilities.

- c. *Provide the date that SDG&E started work on the State Water Resources Control Board (SWRCB) Industrial Stormwater Permit Update.*

SDG&E has only completed the contracting process in December 2014 to secure consultant support to obtain coverage under the new stormwater Industrial General Permit (IGP). The update work will begin in January 2015.

- d. *How long does SDG&E anticipate the SWRCB Industrial Stormwater Permit Update work to take? Provide anticipated completion date.*

The IGP update work including compilation of new Stormwater Pollution Prevention Plans (SWPPPs) for the three SDG&E facilities regulated under this permit will take up to six months to complete in advance of the enforcement date of the Permit (July 2015). The update work will be completed by June 2015.

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- e. Explain why the SWRCB Industrial Stormwater Permit Update work is a recurring expense.*

The work for the SWRCB Industrial Stormwater Permit Update contains both recurring and non-recurring expenses. The non-recurring expense includes the Pre-Construction work to secure coverage for three SDG&E facilities under the new Industrial Stormwater Permit by July 2015. The recurring expenses are those that are on-going expenses required to implement the permit and are identified in the supplemental workpapers for the SWRCB Industrial Stormwater Permit Update as Construction Support (i.e., monthly inspections, quarterly sampling, record keeping and project/program management). SDG&E's test year 2016 non-labor forecast for this incremental upward pressure of \$15k represents the recurring portion of this work. The \$15k figure represents one-half of \$30,888 estimated cost of the recurring work. See supplemental workpapers for cost center 2100-3022.000 (Ex. SDG&E-18-WP) p. 96.

- f. Provide the date that SDG&E started work on the State Water Resources Control Board Programmatic 401 Certification for Linear Projects.*

The work to cooperatively develop a Programmatic 401 Certification for Linear Projects has not started. The effort is anticipated to begin in January 2015 after the necessary consultant contracts are established and funding is secured from each cooperating utility.

- g. How long does SDG&E anticipate the work on the State Water Resources Control Board Programmatic 401 Certification for Linear Projects to take? Provide the anticipated completion date.*

The work to develop the Programmatic 401 Certification for Linear Projects and obtain coverage for SDG&E under the permit after adoption by the SWRCB is anticipated to take two or more years from the anticipated start in January 2015. The anticipated completion date is expected to be 2017 or 2018.

- h. Explain why the State Water Resources Control Board Programmatic 401 Certification for Linear Projects is a recurring expense.*

This expense is expected to be non-recurring beyond 2016. This non-labor expense is forecast to be incurred in 2015 and 2016 for an estimated \$147k in each of those years. SDG&E's 2016 cost forecast incorporates this incremental test year expense of \$147k. See Ex. SDG&E-18-WP, p 101.

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- i. Provide the date that SDG&E started work on the Vault De-watering Permit Renewal.*

The work to obtain coverage under the new Vault De-watering Permit has not started. It will begin in January 2015 after the contract for consultant support is established.

- j. How long does SDG&E anticipate the Vault De-watering Permit Renewal work to take? Provide anticipated completion date.*

The Vault Dewatering Permit coverage renewal work (including development and submittal of a Notice of Intent (NOI) and Pollution Prevention Plan (PPP), and completion of two special studies (e.g., Discharge Characterization Study and ASBS Study) is expected to require up to 3 ½ years to complete. The NOI and PPP will be completed and submitted to the SWRCB prior to end of June 2015 to ensure that coverage under the new permit can be obtained by the effective date of July 1, 2015. The two special studies, which require water quality sampling during several rainy seasons (and analysis) is expected to be completed by July 1, 2018.

- k. Explain why the Vault De-watering Permit Renewal work is a recurring expense.*

The Vault De-watering Permit Renewal work contains both recurring and non-recurring expenses. The non-recurring expense includes the work to obtain coverage under the new Vault De-watering Permit and complete the special studies. The recurring expenses are those that are on-going annual expenses required to implement the permit and are identified in the supplemental workpapers for the Vault De-watering Permit Renewal (i.e., develop annual report and conduct routine annual monitoring). SDG&E's test year 2016 non-labor forecast for this incremental upward pressure of \$20k represents the recurring portion of this work. See supplemental workpapers for cost center 2100-3022.000 (Ex. SDG&E-18-WP) p. 99 (shown as Year 3 Total of \$19,570).

- l. Provide the date that SDG&E started work on the Greenhouse Gas Reporting Support.*

SDG&E began utilizing consultant support in February 2014 to review changes in state (California Air Resources Board, CARB) and federal (Environmental Protection Agency, EPA) regulations as they apply to Subparts A, C, D, W, NN and DD of these mandatory annual greenhouse gas (GHG) reporting programs, as well as to provide QA/QC of compiled SDG&E annual GHG emissions data prior to electronic submittal to CARB and EPA.

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- m. *How long does SDG&E anticipate the Greenhouse Gas Reporting Support work to take? Provide anticipated completion date.*

The GHG reporting program support will be required annually on an ongoing basis. Both CARB and EPA adopt new rules and/or implement revisions to existing rules every year that result in changes to data collection methods, emission factor calculations, reporting program requirements, etc. SDG&E will utilize consultant support annually to ensure that the GHG Subject Matter Expert (SME) is aware of any applicable rule or regulation changes and that SDG&E remains compliant under both the CARB and EPA GHG programs.

- n. *Explain why the Greenhouse Gas Report Support work is a recurring expense.*

Mandatory GHG reports must be submitted to CARB and EPA annually. SDG&E will utilize consultant support for GHG rule/regulation review and GHG data QA/QC every year to ensure compliance with both the CARB and EPA GHG programs.