

Company: San Diego Gas & Electric Company (U902M)
Proceeding: 2016 General Rate Case
Application: A.14-11-003
Exhibit: SDG&E-214

SDG&E

REBUTTAL TESTIMONY OF BRADLEY M. BAUGH

**(CUSTOMER SERVICE OPERATIONS, INFORMATION,
AND TECHNOLOGIES)**

June 2015

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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**SDG&E REBUTTAL TESTIMONY OF BRADLEY M. BAUGH
(CUSTOMER SERVICE OPERATIONS, INFORMATION, AND TECHNOLOGIES)**

I. SUMMARY OF DIFFERENCES

TABLE BMB-1

**Comparison of SDG&E and Intervenors TY 2016 Estimated
Operating & Maintenance (“O&M”) Expenses**

TOTAL O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
SDG&E	\$58,151	\$67,584	\$9,433
ORA	\$58,151	\$57,949	(\$202)
UCAN	\$58,151	\$67,584	\$9,433
SDCAN¹	\$58,151	\$66,463	\$8,312
TURN²	\$58,130	\$67,563	\$9,433
JMP³	N/A	N/A	N/A

TABLE BMB-2

**Comparison of SDG&E and Intervenors
Estimated Capital Expenses**

TOTAL CAPITAL - Constant 2013 (\$000)			
	2014	2015	2016
SDG&E	\$26,743	\$26,317	\$15,579
ORA⁴	\$26,239	\$26,317	\$15,579
UCAN⁵	\$26,743	\$24,388	\$14,185
SDCAN	\$26,743	\$26,317	\$15,579
TURN	\$26,743	\$26,317	\$15,579
JMP	N/A	N/A	N/A

¹ Estimated expenses based on SDCAN’s recommendations of a 10% disallowance for CCC Operations and Support TY 2016 forecast as described in SDCAN testimony, p. 24.

² Estimated expenses based on the disallowances for Exhibit SDG&E-14 shown in TURN testimony, Marcus, p. 47-48, Tables 15 and 17 respectively.

³ JMP does not make a formal revenue requirement proposal as summarized in Section II.E.

⁴ The capital request for Customer Service Operations, Information, and Technologies is addressed by Peter Morse in ORA’s Information Technology testimony (Exhibit ORA-15).

⁵ Estimated capital expenses based on disallowance for Bill Redesign Project pending a more detailed forecast and project justification as described in UCAN testimony, p. 84, lines 14-20.

1 **II. INTRODUCTION**

2 My rebuttal testimony addresses the various recommendations raised by the Office of
3 Ratepayer Advocates (“ORA”), Utility Consumers’ Action Network (“UCAN”), San Diego
4 Consumers’ Action Network (“SDCAN”), The Utility Reform Network (“TURN”), and The
5 Joint Minority Parties (“JMP”) concerning SDG&E’s TY 2016 proposals for Customer Service
6 Operations, Information, and Technologies Non-Shared Services O&M expenses.

7 **A. ORA**

8 ORA submitted testimony on April 24, 2015.⁶ Following is a summary of ORA’s
9 positions regarding Customer Service Operations, Information, and Technologies:

- 10 • ORA accepts SDG&E’s TY 2016 forecast for the following workgroups:
 - 11 – Meter Reading of \$0
 - 12 – Credit and Collections of \$2,848,000
 - 13 – Remittance Processing of \$875,000
 - 14 – Postage of \$4,333,000
 - 15 – Branch Offices and Authorized Pay Locations (“APLs”) of \$1,734,000⁷
 - 16 – Customer Contact Center Support of \$2,395,000
 - 17 – Other Office of \$871,000
- 18 • ORA proposes to disallow portions of SDG&E’s TY 2016 forecast for the following
19 workgroups:
 - 20 – Advanced Metering Operations (“AMO”): SDG&E’s TY 2016 forecast is
21 \$8,771,000. The ORA proposes \$8,135,000 be adopted for TY 2016 or a
22 recommended disallowance of \$636,000.
 - 23 – Billing: SDG&E’s TY 2016 forecast is \$5,839,000. The ORA proposes
24 \$5,210,000 be adopted for TY 2016 or a recommended disallowance of \$629,000.
 - 25 – Branch Offices and APLs: The ORA proposes to disallow SDG&E’s request to
26 close two of its Branch Offices and convert one to an APL for a total annual
27 savings of \$400,135.

⁶ “Report on the Result of Operations San Diego Gas & Electric Company, Southern California Gas Company Test Year 2016 General Rate Case, Customer Services”, Office of Ratepayer Advocates, April 24, 2015.

⁷ The ORA does not accept SDG&E’s request to close two of its Branch Offices and convert one to an APL.

- 1 – Customer Contact Center Operations: SDG&E’s TY 2016 forecast is \$8,813,000.
2 The ORA proposes \$8,741,000 be adopted for TY 2016 or a recommended
3 disallowance of \$72,000.
- 4 – Residential Customer Services: SDG&E’s TY 2016 forecast is \$6,607,000. The
5 ORA proposes \$5,576,000 be adopted for TY 2016 or a recommended
6 disallowance of \$1,031,000.
- 7 – Commercial & Industrial Services: SDG&E’s TY 2016 forecast is \$5,789,000.
8 The ORA proposes \$5,305,000 be adopted for TY 2016 or a recommended
9 disallowance of \$484,000.
- 10 – Communications, Research & Web: SDG&E’s TY 2016 forecast is \$14,287,000.
11 The ORA proposes \$8,093,000 be adopted for TY 2016 or a recommended
12 disallowance of \$6,194,000.
- 13 – Customer Programs & Projects: SDG&E’s TY 2016 forecast is \$3,443,000. The
14 ORA proposes \$2,854,000 be adopted for TY 2016 or a recommended
15 disallowance of \$589,000.
- 16 • ORA does not object to or dispute SDG&E’s capital forecast of \$68,639,000 for
17 Customer Service Operations, Information, and Technologies. The capital request for
18 Customer Service Operations, Information, and Technologies is addressed by ORA
19 witness Peter Morse in ORA’s Information Technology testimony.
- 20 • ORA finds the forecast for Shared Services as reasonable.
- 21 • ORA adopts the uncollectible rate of 0.174%.

22

23 **B. UCAN**

24 UCAN submitted testimony on May 15, 2015.⁸ Following is a summary of UCAN’s
25 positions regarding Customer Service Operations, Information, and Technologies:

- 26 • UCAN is opposed to SDG&E’s request to close three of its Branch Offices. If
27 approved, UCAN recommends imposing stringent and unreasonable requirements.

⁸ “Testimony of Briana Kobor, Laura Norin, and Mark Fulmer on behalf of The Utility Consumers’ Action Network concerning Sempra’s Revenue Requirement Proposals for San Diego Gas & Electric and SoCalGas.”

- 1 • UCAN supports the goal of a bill redesign but is seeking additional information prior
2 to supporting \$3.323 million for SDG&E’s Bill Redesign Project.
3

4 **C. SDCAN**

5 SDCAN submitted testimony on May 15, 2015.⁹ Following is a summary of SDCAN’s
6 positions regarding Customer Service Operations, Information, and Technologies:

- 7 • SDCAN does not believe SDG&E has implemented a sufficient amount of web-based
8 efficiencies and that the Commission should infer operational efficiencies.
9 • SDCAN asserts SDG&E should be providing more Internet-based services.
10 • SDCAN claims SDG&E is not adopting innovative technologies.
11 • SDCAN disputes SDG&E’s budget and call forecast for the Customer Contact
12 Center.
13 • SDCAN claims SDG&E’s request to fund activities that are currently charged to
14 SDG&E’s Dynamic Pricing Balancing Account and will transition to O&M in TY
15 2016 would result in double charging SDG&E’s customers for these activities.
16 • SDCAN recommends a 10% imputed efficiency of \$1.121 million for Customer
17 Contact Center Operations and Support TY 2016 forecast that the Commission
18 deferred to apply in Commission Decision 13-05-010.
19

20 **D. TURN**

21 TURN submitted testimony on May 15, 2015.¹⁰ Following is a summary of TURN’s
22 position regarding Customer Service Operations, Information, and Technologies:

- 23 • TURN recommends SDG&E’s BY 2013 be reduced by \$21,485 to remove clothing
24 and other promotional gear and tickets to sporting and cultural events.¹¹
25

⁹ “SDCAN Evaluation of San Diego Gas and Electric Company’s Customer Service and External Affairs Activities. Prepared testimony of Michael Shames.”

¹⁰ “Report on Various Results of Operations Issues in Southern California Gas Company’s and San Diego Gas and Electric Company’s 2016 Test Year General Rate Cases.” “Prepared testimony of William B. Marcus.”

¹¹ TURN testimony, Marcus, pp. 47-48, Tables 15 and 17.

1 **E. JMP**

2 JMP submitted testimony on May 15, 2015.¹² Following is a summary of JMP’s position
3 regarding Customer Service Operations, Information, and Technologies:

- 4 • JMP does not make a formal revenue requirement proposal, but recommends five
5 percent of any rate increases over the three year GRC period be allocated for
6 marketing, outreach, and education focused on those who are impacted the most.

7
8 **III. REBUTTAL TO PARTIES’ NON-SHARED SERVICES O&M PROPOSALS**

9 **TABLE BMB-3**

10 **Comparison of SDG&E and Intervenors TY 2016 Estimated**
11 **Non-Shared Services O&M Expenses**
12

NON-SHARED O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
SDG&E	\$57,175	\$66,605	\$9,430
ORA	\$57,175	\$56,970	(\$205)
UCAN	\$57,175	\$66,605	\$9,430
SDCAN	\$57,175	\$65,484	\$8,309
TURN	\$57,154	\$66,584	\$9,430
JMP	N/A	N/A	N/A

13
14 **A. ORA**

15 SDG&E requested a Test Year (TY) 2016 increase of \$9.430 million from Base Year
16 (BY) 2013 Customer Service Operations, Information, and Technologies adjusted-recorded
17 expenditures for its non-shared services. ORA depicts this as a 16.49% increase over SDG&E’s
18 BY 2013 adjusted-recorded expense. This is misleading as it does not account for the portion of
19 the increase that is already included in SDG&E’s Dynamic Pricing Balancing Account
20 (“DPBA”) and is being transitioned into O&M as ordered by the Commission and included in
21 SDG&E’s TY 2016 request¹³. It would be more accurate to show SDG&E’s TY 2016 requested
22 increase as \$6.694 million or 11.71% over SDG&E’s BY 2013 adjusted-recorded expense as

¹² “Joint Minority Parties Initial Testimony on San Diego Gas & Electric Company (U 902 M) General Rate Case.”

¹³ See section III.A.1 “ORA ignores almost all of SDG&E’s request for ongoing support for the Smart Pricing Program for Customer Service Operations” and section III.A.2 “ORA ignores almost all of SDG&E’s request for ongoing support for the Smart Pricing Program for Customer Service Information” for a full discussion on the impacts of the DPBA.

1 shown in Table BMB-4, which is a more accurate depiction of the impact to customer rates. A
 2 more detailed discussion of the DPBA and the Smart Pricing Program (“SPP”) activities is
 3 included throughout this testimony.

4 **TABLE BMB-4**
 5 **Impact of DPBA on TY 2016 NSS Request**

NSS Work Groups	Base Year 2013	Test Year 2016	Total		SPP Adj 2016	Without SPP	
			\$ Change	% Change		\$ Change	% Change
100000.000 - Advanced Metering Ops (AMO)	\$ 8,134	\$ 8,771	\$ 637	7.83%		\$ 637	7.83%
100001.000 - Meter Reading	\$ -	\$ -	\$ -	0.00%		\$ -	0.00%
100002.000 - Billing	\$ 5,073	\$ 5,839	\$ 766	15.10%	\$ 410	\$ 356	7.02%
100003.000 - Credit & Collections	\$ 2,708	\$ 2,848	\$ 140	5.17%		\$ 140	5.17%
100004.000 - Remittance Processing	\$ 887	\$ 875	\$ (12)	-1.35%		\$ (12)	-1.35%
100004.001 - Postage	\$ 4,431	\$ 4,333	\$ (98)	-2.21%		\$ (98)	-2.21%
100005.000 - Branch Offices	\$ 2,019	\$ 1,734	\$ (285)	-14.12%		\$ (285)	-14.12%
100006.000 - CCC Operations	\$ 9,188	\$ 8,813	\$ (375)	-4.08%	\$ 97	\$ (472)	-5.14%
100007.000 - CCC Support	\$ 2,322	\$ 2,395	\$ 73	3.14%		\$ 73	3.14%
100012.000 - Other Office	\$ 871	\$ 871	\$ -	0.00%		\$ -	0.00%
100008.000 - Residential Customer Services	\$ 5,576	\$ 6,607	\$ 1,031	18.49%	\$ 1,319	\$ (288)	-5.16%
100009.000 - C&I Services	\$ 5,305	\$ 5,789	\$ 484	9.12%	\$ 138	\$ 346	6.52%
100010.000 - Communications Research & Web	\$ 7,940	\$ 14,287	\$ 6,347	79.94%	\$ 631	\$ 5,716	71.99%
100011.000 - Customer Programs & Projects	\$ 2,721	\$ 3,443	\$ 722	26.53%	\$ 141	\$ 581	21.35%
Total NSS Work Groups	\$ 57,175	\$ 66,605	\$ 9,430	16.49%	\$ 2,736	\$ 6,694	11.71%

6
 7
 8 ORA’s recommended disallowances for TY 2016 O&M expenses effectively eliminates
 9 all of SDG&E’s requested increase and further reduces BY 2013 adjusted-recorded expenditures
 10 by another \$202,000.

11 Before addressing each of the workgroups within Customer Service Operations,
 12 Information, and Technologies, I will address ORA’s main argument that SDG&E has sufficient
 13 funding in its BY 2013 adjusted-recorded expenses to fund TY 2016 activities.

14
 15 **ORA’s analysis that SDG&E has sufficient funding in its 2013 adjusted-recorded**
 16 **expenses to fund its 2016 forecasted activities is flawed and incorrect.**

17
 18 Throughout its testimony, ORA implies that SDG&E has sufficient funding in its BY
 19 2013 adjusted-recorded expenses to fund its proposed TY 2016 forecasted activities. ORA does
 20 not object to or dispute the need for SDG&E’s proposed TY 2016 forecasted activities. Rather,
 21 ORA implies that these activities are not incremental to the BY 2013 adjusted-recorded expense
 22 level. ORA points to three main areas to support its argument. These arguments are detailed
 23 below and summarized in Table BMB-5.

1 **2014 Adjusted-Recorded Expense**

2 In its discussion of specific workgroups, ORA notes that SDG&E’s 2014 adjusted-
3 recorded expense level is lower than its BY 2013 adjusted-recorded expense level implying that
4 the difference could be used to fund SDG&E’s TY 2016 forecasted activities.¹⁴ As shown in
5 Table BMB-5, SDG&E’s BY 2013 adjusted-recorded expense of \$58.151 million was \$4.870
6 million greater than its 2014 adjusted-recorded expense of \$53.281 million. Throughout its
7 rebuttal testimony, SDG&E shows that introducing 2014 adjusted-recorded expense information
8 is a flawed and misleading analytical approach¹⁵ and establishes that a large contributing factor
9 of the decreased expense level from BY 2013 to 2014 was SDG&E achieving its \$2.785 million
10 process improvements, productivity, and efficiencies that are incorporated in SDG&E’s TY 2016
11 forecast. The analysis in Table BMB-5 adjusts for SDG&E’s committed efficiency
12 achievements.

13
14 **BY 2013 Embedded Expenses**

15 ORA speculates that several of SDG&E’s workgroups contain “costs incurred for one-
16 time, non-recurring and unusual activities (expenses incurred that are not necessary or required
17 to operate the utility business)”¹⁶ that can be used to fund SDG&E’s TY 2016 forecasted
18 activities. When SDG&E asked ORA through data request SEU-ORA-DR-3 (see ORA’s
19 response to SEU-ORA-DR-3, Q1 in Appendix B) to provide the basis for its assertions that there
20 were one-time and non-recurring expenses embedded in SDG&E historical expenses, ORA
21 provided a non-responsive reply referring back to an SDG&E response to an ORA data request
22 (see Appendix A, Attachment A.1 for SDG&E’s response to ORA-SDG&E-051-TLG, Q9)
23 where SDG&E provided historical expenses for 2009 – 2013. ORA then pointed to its testimony
24 pages where these un-substantiated assertions were made.¹⁷ ORA then listed individual expense
25 categories that could be used to fund SDG&E’s requested TY 2016 forecasted activities.

26

¹⁴ Exhibit ORA-13, (p. 21, lines 2-3), (p. 28, lines 6-7), (p.30, lines 11-13), (p.32, lines 15-16), and (p.39, lines 12-14).

¹⁵ See Section III.A.1 under the heading “ORA improperly introduces 2014 adjusted-recorded expenses” for more detailed information.

¹⁶ Exhibit ORA-13, (p. 19, lines 9-15), (p. 20, footnote 49), (p.31, lines 1-4), (p.33, lines 4-8), and (p.40, lines 3-7).

¹⁷ Exhibit ORA-13, pp. 19, 31, 33, and 40.

1 ORA's data request response states:
2

3 "ORA's review and analysis of SDG&E's 2009-2013 adjusted-recorded expenses
4 provided in SDG&E's response to ORA-SDG&E-051-TLG, question 9 shows significant
5 expense fluctuations from year to year for several line items demonstrating that the
6 associated activities and related costs are not incurred at that expense level on a yearly
7 basis (i.e., one-time and non-recurring expenses). Note that expenses associated with
8 employee signing bonuses, employee meals, luncheons, entertainment, gift cards,
9 employee recognition, holiday events, various corporate events, tickets to sporting events,
10 certain employee/company dues and memberships, and employee laundry are a few
11 examples of the type of expenses SDG&E incurred between 2009-2013 that are not
12 necessary or required to operate the utility business. ORA did not remove these expenses
13 from its estimate, which provides SDG&E with embedded costs that can be reallocated in
14 the TY for proposed activities."
15

16 Table BMB-5 shows both the five-year average and BY 2013 adjusted-recorded expenses
17 for each expense category ORA claimed in its data request response as "one-time and non-
18 recurring expenses" and "that are not necessary or required to operate the utility business." The
19 data in Table BMB-5 clearly highlights ORA's faulty analysis. Specifically, each expense
20 category's BY 2013 adjusted-recorded expense is consistent with its five-year average adjusted-
21 recorded expense level, thereby invalidating ORA's assertion that these are "one-time and non-
22 recurring expenses." SDG&E also disagrees with ORA's assertion that these expenses "are not
23 necessary or required to operate the utility business." Below is a list of SDG&E's cost elements
24 that correspond to the expense categories ORA provided in its data request response as the basis
25 for its argument, including a description of the expense category and explanation of the business
26 expense. These expense categories are appropriate business expenses, consistent with business
27 norms, and should not be considered "embedded costs that can be reallocated in the TY for
28 proposed activities."
29

- 1 • *Employee signing bonuses* - Employee signing bonuses are normal course of
2 business, although not frequent in nature, but occur and are used as incentive for
3 employment with SDG&E. Bonuses can also lower the risk of salary escalation, as it
4 is a one-time payment that is not part of their base salary.
- 5 • *Employee meals (6130010 EMP TRVL-MEALS & TIP)* – Employee expense
6 reimbursements for meals that are consumed during an extended workday or meals
7 provided for working meetings through breakfast or lunch. The meal must be
8 provided on the job site, not be frequent in occurrence and due to an extended
9 workday or working through mealtime.
- 10 • *Employee meals (6130015 EMP TRVL-MEALS/ENT)* – Employee expense
11 reimbursements for expenditures incurred while on business travel away from home.
12 Out-of-town meal expenses normally require an overnight stay away from the
13 employee's home. This also includes business meals while not traveling. These
14 expenditures must include discussions of a business nature and shall not be excessive
15 in frequency.
- 16 • *Luncheons (catered meals)*¹⁸ - Luncheon expenses include payments made directly to
17 vendors for catered meals for business meetings, employee safety meetings, staff
18 meetings, etc.
- 19 • *Entertainment* - Entertainment expenses are not uniquely identified in SDG&E's
20 accounting system. Entertainment costs would have been included in the following:
21 Employee meals (6130010 EMP TRVL-MEALS & TIP), holiday events, and tickets
22 to supporting events.
- 23 • *Employee recognition (includes gift cards)* - Employee recognition expenses include
24 gift cards (\$100 or less) given to employees for such things as extraordinary
25 contributions to projects, meeting or exceeding budget goals, providing excellent

¹⁸ SDG&E discovered an \$80,500 cost element charging error in BY 2013 adjusted-recorded for Customer Communications & Research Workgroup 100010.000. This expense amount was for BY 2013 Winter Prep Online Advertising, and was charged in error to Cost Element (C/E) Category: 01 Employee Luncheons, Cost Element 6220060 SRV-CATERING. This expense amount should have been charged to C/E Category: 09-Communication/Adv Svcs, Cost Element: 6220050 SRV-ADVRTSNG&MKTG. Table BMB-5 reflects the correction by removing \$80,500 from the luncheons category BY 2013 adjusted-recorded and 2009-2013 adjusted-recorded then calculating the five-year average based on the revised total.

1 customer service, excellent achievements and to promote teamwork. It is one method
2 to recognize and motivate employees, which results in increased employee morale,
3 productivity, and workplace satisfaction.

- 4 • *Holiday events* - Holiday events.
- 5 • *Various corporate events* – The main expenses are for customer and community
6 outreach and education events, booth space rentals, and event sponsorships.
7 Expenses also included in this category are for partnerships with community based
8 organizations to coordinate enhanced outreach efforts including customized
9 messaging, social media posts, special events and service and program offerings.
10 Largely grassroots, multicultural and neighborhood centric, these organizations are
11 diverse and provide direct services to populations including multilingual, seniors,
12 special needs (disabled), low-income and young families. The types of employee
13 event expenses include safety events and employee tailgates, where information is
14 provided to employees on safety and other key messaging such as energy
15 conservation and SDG&E program offerings (medical baseline, Neighbor-to-
16 Neighbor Program, LIHEAP, 2-1-1, etc.).
- 17 • *Tickets to sporting events* - Tickets to sporting events is a very common business
18 practice across all industries to develop and maintain customer relationships. The
19 expenses included in this category include tickets to sporting events for both
20 customers and employee recognition. The sporting events attended by customers
21 provide opportunities to discuss such things as customer energy solutions, outreach
22 strategies and tactics, rates, and energy conservation.
- 23 • *Certain employee/company dues and memberships* - Dues include expenses for
24 membership dues to business/professional organizations such as San Diego Regional
25 Clean Fuels Coalition, California Electric Transportations Coalition, LEAD San
26 Diego, American Marketing Association, Electric Power Research Institute,
27 Professional Engineers & Land Surveyors License fees, etc., as well as social dues for
28 Toastmaster membership.

- *Employee laundry* - Employee laundry expenses included in this category are for SDG&E's Advanced Metering Operations and Meter Revenue Protection employee uniform rentals, laundering of these uniforms, as well as rentals of floor mats for SDG&E's Branch Offices. It should be noted that these uniforms are also for employee safety as they are fire retardant. SDG&E does not provide laundry services for employees' personal clothing.

As shown by the foregoing facts, ORA's assertion that these expenses are "not necessary or required to operate the utility business" is an invalid and flawed argument. While SDG&E believes that entertainment expenses are valid business expenses, they are not uniquely identified or tracked within SDG&E's accounting system. Since entertainment expenses could have been included in the following expense categories (Employee meals (6130010 EMP TRVL-MEALS & TIP), holiday events, and tickets to supporting events) an adjustment of \$58,000 has been made to Table BMB-5.

BY 2013 Overtime Expense

ORA also makes an assertion that overtime costs can be used to fund TY 2016 forecasted activities.¹⁹ When asked through data request SEU-ORA-DR-3 (see ORA response to SEU-ORA-DR-3 Q1 in Appendix B) to provide the basis for its assertion concerning overtime, ORA provided the following non-responsive reply:

"Regarding overtime costs included in 2009-2013 adjusted-recorded expenses for Advanced Metering Operations, see SDG&E's response to ORA-SDG&E-051-TLG, question 9." and "Regarding overtime costs included in 2009-2013 adjusted-recorded expenses for Residential Customer Services, see SDG&E's response to ORA-SDG&E-051-TLG, Q.9."

Without ORA providing any reasons for its assertions regarding overtime, SDG&E can only speculate that ORA feels overtime is an invalid expense. As shown in Table BMB-6, the only two workgroups that have any material overtime expenses are Advanced Meter Operations

¹⁹ Exhibit ORA-13, (p. 19, line 10) and (p. 31, line 2)

1 (“AMO”) and the Customer Contact Center (“CCC”). AMO overtime is for weekend and after-
2 hours work for items such as emergency orders and customer planned outages. Similarly, the
3 CCC overtime is for after-hours work during outages and emergencies as well as normal
4 weekend and holiday staffing. There are occasions in the CCC where vacancies or unplanned
5 absences may result in increased overtime expense. However, as shown in my direct
6 testimony,²⁰ SDG&E has already removed CCC overtime expense from its TY 2016 forecast. It
7 should also be noted that the BY 2013 adjusted-recorded overtime expense is consistent with the
8 five-year average adjusted-recorded overtime expense, further highlighting that this is a normal
9 business expense and not a one-time item.

10 Without any analysis or explanation from ORA and the fact that overtime is a valid
11 business expense and necessary for SDG&E operations, Table BMB-5 has been adjusted
12 accordingly by excluding overtime in SDG&E’s adjustment calculation.
13

²⁰ Exhibit SDG&E-14, p. BMB-53, lines 1-13.

1 **TABLE BMB-5**

2 **SDG&E Analysis of ORA Funding Assertions**

	Shown in 2013 \$ (000)		
2013 Adjusted-Recorded Expense	\$58,151		
2014 Adjusted-Recorded Expense	\$53,281		
2013 - 2014 Adjusted-Recorded Expense	(\$4,870)	(\$4,870)	(\$4,870)
Customer Service Efficiencies (Appendix C, Supplemental Tables, Attachment C.1)	\$2,785	\$2,785	\$2,785
	5 Year Avg (2009-2013) Total Cost Element Category	2013 Adj Rec Total Cost Element Category	SDG&E Adjustments to 2013 Adj Rec expenses
ORA Embedded Expenses Cost Categories			
employee signing bonuses	(\$15)	(\$18)	\$0
employee meals (6130010 EMP TRVL-MEALS & TIP) ¹	(\$23)	(\$44)	\$0
employee meals (6130015 EMP TRVL-MEALS/ENT) ¹	(\$54)	(\$46)	(\$46)
luncheons (catered meals)	(\$128)	(\$164)	\$0
employee recognition (includes gift cards)	(\$21)	(\$24)	\$0
holiday events (6230540 SRV-HOLIDAY EVENTS) ¹	(\$12)	(\$9)	(\$9)
various corporate events	(\$230)	(\$210)	\$0
tickets to supporting events (6230680 SRV-EVENT & TICKETS) ¹	(\$6)	(\$3)	(\$3)
certain employee/company dues and memberships	(\$351)	(\$487)	\$0
employee laundry (6220855 SRV-UNIFORM LNDRY/RNT) ¹	(\$79)	(\$68)	\$0
Subtotal of ORA Embedded Expenses	(\$919)	(\$1,073)	(\$58)
Overtime	(\$807)	(\$813)	\$0
Total ORA Embedded 2013 Expenses (inclusive of \$2.785M in efficiencies included in SDG&E's TY2016 Forecast)	(\$3,811)	(\$3,971)	(\$2,143)
SDG&E TY 2016 Incremental Activities	\$9,433	\$9,433	\$9,433
Remaining SDG&E Funding Requirement	\$5,622	\$5,462	\$7,290
¹ The data provided in parenthesis are SDG&E's cost element number and cost element description which are categories of costs in SDG&E's accounting system.			

1 2016 forecasted activity level would still be underfunded by \$7.290 million. Since ORA did not
2 object to or dispute the need for any of SDG&E's proposed TY 2016 forecasted activities and the
3 fact the ORA's forecast lacks factual support and analysis, the Commission should reject ORA's
4 TY 2016 forecast and approve SDG&E's original TY 2016 forecast.

5
6 **1. Customer Service Operations**

7
8 **ORA improperly assumes a decline in Customer Service Operations Non-Shared**
9 **Expenses for 2009-2014.**

10
11 ORA states the following:

12
13 "SDG&E forecasts \$36.479 million for its Customer Service Operations Non-Shared TY
14 2016 expenses. SDG&E's adjusted-recorded expenses declined each year over the six
15 year period (2009-2014). SDG&E's adjusted-recorded expenses declined by \$8.478
16 million between 2009 and 2014 from \$42.620 million in 2009 to \$34.142 million in 2014.
17 ORA recommends \$35.142 million for SDG&E's Customer Service Operations Non-
18 Shared TY 2016 expenses."²¹

19

²¹ Exhibit ORA-13, p. 16, lines 3-7.

TABLE BMB-7

**Non-Shared Customer Service Operations Expenses
2009-2014 Recorded and TY 2016 Forecast
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast	2009 - 2013 % Change
Advanced Metering	\$5,289	\$5,584	\$5,422	\$8,153	\$8,134	\$8,035	\$8,771	\$8,135	53.8%
Meter Reading	\$9,676	\$7,057	\$4,251	(\$1)	\$0	\$0	\$0	\$0	-100.0%
Billing	\$4,552	\$4,611	\$4,365	\$5,003	\$5,073	\$4,796	\$5,839	\$5,210	11.4%
Credit & Collections	\$2,578	\$2,582	\$2,623	\$2,570	\$2,708	\$2,579	\$2,848	\$2,848	5.0%
Remittance Processing	\$1,025	\$877	\$886	\$815	\$887	\$686	\$875	\$875	-13.5%
Postage	\$5,058	\$5,007	\$4,979	\$4,597	\$4,431	\$4,538	\$4,333	\$4,333	-12.4%
Branch Offices	\$1,956	\$1,872	\$1,978	\$1,894	\$2,019	\$1,931	\$1,734	\$1,734	3.2%
Customer Contact Center Operations	\$9,365	\$9,263	\$8,826	\$8,908	\$9,188	\$8,205	\$8,813	\$8,741	-1.9%
Customer Contact Center Support	\$2,292	\$2,404	\$2,389	\$2,307	\$2,322	\$2,267	\$2,395	\$2,395	1.3%
Other Office	\$829	\$448	\$886	\$1,443	\$871	\$1,105	\$871	\$871	5.1%
Total	\$42,620	\$39,705	\$36,605	\$35,689	\$35,633	\$34,142	\$36,479	\$35,142	-16.4%
Total without Meter Reading	\$32,944	\$32,648	\$32,354	\$35,690	\$35,633	\$34,142	\$36,479	\$35,142	8.2%

ORA’s statement that SDG&E non-shared Customer Service Operations expenses declined each year over the 2009-2014 period is misleading and incorrect.

As Table BMB-7 clearly indicates, all (and more) of the \$8.5 million decrease between 2009 and 2014 is accounted for by the elimination of the complete Meter Reading Department effective 2012. In fact, the Meter Reading Department 2009 recorded expenses of almost \$9.7 million were completely eliminated by 2012. The Meter Reading function/department was eliminated in its entirety because of Smart Meter deployment. After adjustment for Meter Reading recorded expenses, Table BMB-7 shows that Customer Services Operations actually experienced an increase in recorded expenses from 2009 to BY 2013 of almost \$2.7 million or 8.2% (\$32.9 million to \$35.6 million).

1 **ORA improperly introduces 2014 adjusted-recorded expenses.**

2
3 In several workgroups, ORA asserts that the 2014 GRC forecast is overstated, and as
4 such SDG&E’s TY 2016 GRC forecast must be overstated and disallowed. ORA takes a
5 simplified approach to forecasting TY 2016 expenses that ignores several key factors. First,
6 ORA ignores year-to-year activity levels that can cause fluctuations in recorded expenses (e.g.,
7 order volumes, labor vacancies, expense timing, etc.). Second, ORA ignores that SDG&E has
8 forecasted nearly \$3 million of process improvements, productivity and efficiency increases that
9 must be achieved by TY 2016. Thus, 2014 expense reductions contribute towards TY 2016
10 process improvement goals. These activities include items such as streamlining AMO’s field
11 order process to reduce duplicate field orders, automating back office billing processes for
12 identifying consumption on inactive meters, optimizing staffing in both the Customer Contact
13 Center (“CCC”) and Branch Offices, reduced CCC call volumes resulting from self-service
14 enhancements in the IVR, and reductions in call handling time resulting from a new web-based
15 desktop for the CCC. (See Appendix C, Supplemental Tables, Attachment C.1) Third, TY 2016
16 represents incremental activity to BY 2013 not to 2014, so including 2014 actual expenses is a
17 flawed analytical approach in evaluating TY 2016 expense levels. If the California Public
18 Utilities Commission (“Commission” or “CPUC”) were to agree with ORA’s approach of using
19 2014 actual data in computing the forecast of TY 2016 incremental activities, SDG&E would
20 need to fully factor the impact of 2014 actual expense and re-compute all its TY 2016
21 incremental requirements.

22 In addition to all the factors just stated, ORA is selective and only applies this approach
23 to certain workgroups. Other workgroups where the 2014 actual expense is greater or less than
24 the 2014 forecast, ORA deems the TY 2016 forecast as reasonable. Due to its flawed analytical
25 approach and inconsistent application of forecasting methodologies, ORA’s recommended
26 funding level for Customer Service non-shared TY 2016 O&M expenses should be rejected.

1 **ORA ignores almost all of SDG&E’s request for ongoing support for the Smart**
2 **Pricing Program for Customer Service Operations.**

3
4 In my direct testimony,²² I explain the Smart Pricing Program (“SPP”) was established in
5 2010 to implement new rate options, customer tools, and other provisions adopted by CPUC
6 Decision (“D.”) 12-12-004 in SDG&E’s Dynamic Pricing Application.²³ Ordering Paragraph 16
7 of D.12-12-004 ordered SDG&E to establish a Dynamic Pricing Balancing Account (“DPBA”)
8 to record its costs related to the implementation of the program. As described in my direct
9 testimony, the CPUC authorized SDG&E to request funding for post-2015 operational costs as
10 part of a future GRC.²⁴ Therefore, SDG&E’s TY 2016 GRC forecast includes the operational
11 costs necessary to support ongoing SPP expenses as shown in Appendix C, Supplemental Tables,
12 Attachment C.2. SPP expenses are now funded through 2015 in the DPBA. As stated above,
13 the Commission has explicitly ordered in D.12-12-004 that continued funding for SPP be
14 included in GRC rates. As such, SDG&E should be authorized funding to transition these
15 activities to GRC rates in TY 2016.

16 By disallowing TY 2016 incremental activities for SDG&E’s non-shared Customer
17 Service Operations,²⁵ ORA essentially ignores the CPUC’s order. Any disallowance will have a
18 direct impact to SDG&E’s customers as described in each workgroup area that I am seeking
19 dollars to support SPP.

20 Now I will address specific ORA testimony directed at Customer Service Operations
21 workgroups.
22

²² Exhibit SDG&E-14, p. BMB-23, beginning on line 3.

²³ A.10-07-009.

²⁴ CPUC D.12-12-004, pp. 16-17 and Ordering Paragraph 15.

²⁵ With the exception of SDG&E’s request for additional billing positions to support new rate options and programs including SPP which the ORA partially approved. SDG&E discusses ORA’s calculation error in Section III.A.1.b under the heading “ORA’s calculation error regarding the billing positions.”

1 going function of performing manual meter reading.”³⁰ ORA also states, “SDG&E’s 2012 and
2 2013 adjusted-recorded expenses are slightly more than its 2014 adjusted-recorded expenses, the
3 three years of recorded expenses are relatively flat (2012-2014).”³¹ ORA ignores SDG&E’s TY
4 2016 forecasted activity levels and provides little support for choosing BY 2013 adjusted-
5 recorded expenses as its basis to forecast TY 2016 expenses.

6 For the above reasons, the Commission should adopt SDG&E’s AMO TY 2016 zero-
7 based forecast for labor and BY 2013 forecast for non-labor.

8
9 **ORA incorrectly claims that SDG&E’s AMO increase is not justified and its TY**
10 **2016 expense is overstated.**

11
12 ORA asserts: “SDG&E’s forecast is not justified and the method utilized to calculate its
13 forecast overstates its TY expenses.”³²

14
15 ORA’s analysis and recommendations are flawed on many levels. First, ORA’s analysis
16 ignores that TY 2016 represents incremental activities to BY 2013 as shown in my direct
17 testimony.³³ For example, AMO has incremental activities related to testing hardware/firmware
18 releases, meter reading activities, and field compliance and maintenance activities. ORA does
19 not object or dispute the need for these incremental activities, although they disallow the
20 incremental funding to support these activities and ignore the analysis supporting these
21 additional activity levels between BY 2013 and TY 2016. In fact, AMO has shown a 53.8%
22 growth in adjusted-recorded expense from 2009 – 2013 (see Table BMB-7).

23

³⁰ Exhibit ORA-13, p. 19, lines 5-8.

³¹ Exhibit ORA-13, p. 17, footnote 35.

³² Exhibit ORA-13, p. 18, lines 6-7.

³³ Exhibit SDG&E-14, p. BMB-13, beginning on line 6 to BMB-18.

1 ORA further speculates: “SDG&E’s 2014 adjusted-recorded expenses of \$8.035 million
2 is \$0.945 million less than its 2014 forecast of \$8.980 million.”³⁴ and that “SDG&E’s forecast
3 for TY 2016, was calculated in the same manner as its 2014 forecast, and is likewise
4 overstated.”³⁵

5 ORA improperly assumes that 2014 adjusted-recorded expenses being less than the 2014
6 GRC forecast is relevant and should be used to call into question the TY 2016 forecast. Because
7 of SDG&E’s commitment of nearly \$3 million of reductions by TY 2016, SDG&E must initiate
8 and implement reductions in forecast year 2014 in order to achieve the TY 2016 embedded cost
9 reductions (shown in Appendix C, Supplemental Tables, Attachment C.1). For example, the
10 forecast for AMO workgroup includes savings related to duplicate field visits, coaching/training
11 employees to improve performance, redistributing workload, and capital project savings.³⁶
12 SDG&E has committed to efficiency gains by TY 2016 and therefore is attempting to achieve
13 these efficiency gains in 2014 and 2015. SDG&E disagrees with ORA’s assumptions and urges
14 the CPUC to fully fund these incremental activities for AMO.

15
16 **ORA is mistaken in its claim that SDG&E is seeking the same positions as requested**
17 **in its TY 2012 GRC.**

18
19 ORA states the following:

20
21 “SDG&E requested and was authorized funding of \$0.884 million for 11.5 FTEs in its
22 2012 GRC. SDG&E is requesting funding for those positions again in its 2016 GRC.”³⁷

23
24 At the request of ORA in ORA-SDG&E-DR-051-TLG, Question 2 (see SDG&E
25 response to ORA-SDG&E-DR-051-TLG, Q2 in Appendix A, Attachment A.2), SDG&E
26 included a list of activities that were requested in SDG&E’s TY 2012
27

³⁴ Exhibit ORA-13, pp. 18-19, beginning at line 18.

³⁵ Exhibit ORA-13, p. 19, lines 1-2.

³⁶ Exhibit SDG&E-14, p. BMB-13, Table 6.

³⁷ Exhibit ORA-13, p. 17, footnote 36.

1 GRC that are also requested in SDG&E's TY 2016 GRC. SDG&E's response included the
 2 following explanation for the field compliance and maintenance work:

Workgroup	Activity	2012 GRC (2009 \$'s)	TY 2016 GRC (2013 \$'s)	TY 2016 Explanation
AMO	Field Compliance & Maintenance Work	Requested and received approval for 11.5 FTEs - \$884K	Requesting 8.5 FTEs - \$862K	Combination of an increase of compliance testing orders above the 2013 level, and a delay of when compliance activities forecasted in the 2012 GRC switched from charging the Advanced Metering Infrastructure Balancing Account to charging O&M (see details on pages BMB-16 and BMB-17 of Brad Baugh's direct testimony Exhibit SDG&E-14).

3
 4 The positions authorized in SDG&E's TY 2012 GRC were filled, however the expenses
 5 were recorded to SDG&E's Advanced Metering Infrastructure Balancing Account ("AMIBA")
 6 as approved by CPUC D.11-03-042.³⁸ D.11-03-042 extended the AMIBA until SDG&E
 7 completed its deployment of Smart Meters. D.11-03-042 addressed the three elements that
 8 required the AMIBA to be extended which included: 1) a delay in the full implementation of the
 9 associated billing systems and software supporting these meters; 2) inability to access the meter
 10 location and difficulties removing the existing meter and installing a new Smart Meter; and 3)
 11 waiting for the programmable communicating thermostats with newer technologies to become
 12 available.³⁹ As a result, SDG&E recorded the activities performed by the TY 2012 GRC
 13 authorized resources to its AMIBA.

14 While SDG&E received approval of these positions in its TY 2012 GRC, the funding was
 15 reallocated to perform other high priority business activities as can be expected. Overall,
 16 Customer Service Operations, Information, and Technologies were still within 1.0% of its TY
 17 2012 authorized amount and BY 2013 adjusted-recorded expenses. ORA does not recognize that

³⁸ SDG&E A.05-03-015, Advanced Metering Infrastructure Deployment Scenario and Associated Cost Recovery and Rate Design.

³⁹ D.11-03-042, pp. 5-6.

1 changes in business priorities can cause expense shifts between workgroups within SDG&E's
2 Customer Service Operations, Information, and Technologies but that overall spending remains
3 relatively stable.

4
5 **ORA is incorrect in asserting that BY 2013 was the highest O&M expense year for**
6 **field compliance and other maintenance work, and therefore no additional expenses are**
7 **needed for TY 2016.**

8
9 "SDG&E's 2013 adjusted-recorded expenses for Resumption of Field Compliance and
10 Other Maintenance work of \$2.318 million was the highest expense level recorded
11 between 2009-2013 and had the highest level of FTEs at 31.2 (the average FTE count
12 between 2009-2012 was 22). SDG&E response to ORA-SDG&E-072-TLG, Q.1-a
13 Attachment."⁴⁰

14
15 ORA is wrong in its implication that no additional expenses for field compliance and
16 other maintenance work is needed. In addition to the transition of AMIBA recorded expenses to
17 O&M, SDG&E is projecting an increase in meter test orders as presented in my direct
18 testimony.⁴¹ Additional orders will help to ensure that SDG&E is measuring customer usage
19 data accurately as customers select rate options based on the data. The Smart Meters service
20 level agreement requires meters within 0.5% and 0.2% accuracy level, which is a higher set of
21 standards than legacy electro-mechanical meters. Because tighter accuracy limits have been
22 established with Smart Meters, the testing sample size must be increased to ensure statistical
23 validity of test results. In addition, Smart Meters continually monitor for events related to
24 firmware and hardware errors, battery errors, and other errors. Positive identification of such
25 events results in sending out a truck for meter changes. Lastly, SDG&E anticipates an increase
26 in customer generated orders requiring SDG&E to test electric meters for accuracy because of
27 the future adoption of new time-varying rate options.

28 For the reasons described above, SDG&E's request to perform meter testing is reasonable
29 and therefore requires \$862,000 of incremental funding.

⁴⁰ Exhibit ORA-13, p. 17, footnote 38.

⁴¹ Exhibit SDG&E-14, p. BMB-16, beginning on line 11.

1 **ORA may be confusing Meter Testing with Testing Firmware/Hardware Releases**

2 **Testing**

3
4 ORA states the following:

5
6 “SDG&E started deploying Smart Meters, which are tested on an annual basis, in 2008
7 through 2014, and its historical costs include funding for meter testing activities (SDG&E
8 response to ORASDG&E-051-TLG, Q.16).”⁴²

9
10 It is unclear why ORA attached the statement above to a statement concerning “Testing
11 Hardware/Firmware Releases.”⁴³ ORA is incorrect to infer that historical costs for meter testing
12 activities could be used for hardware/firmware release testing. Meter testing is a unique and
13 separate activity to testing hardware/firmware releases. Firmware/hardware system testing refers
14 to back office testing performed by metering engineers to ensure new firmware and hardware
15 upgrades, enhancements and/or modifications made to SDG&E Smart Meters function properly
16 prior to installation. However, meter testing is focused on meter measurement accuracy, not
17 firmware/hardware quality or functionality.

18 A process to test and document future hardware changes and new firmware upgrades is
19 crucial to minimize future meter failures and repair/replacement costs of Smart Meters. A fully
20 deployed Smart Meter network makes proactive issue identification a necessity. Having an
21 established process for testing and documenting all the hardware changes and firmware upgrades
22 will provide a way to effectively evaluate the current meter population, understand causes for
23 meter failure, and minimizes conditions that cause the failure. Issues not identified could result
24 in significant endpoint failures during new firmware and hardware deployment. With almost all
25 of SDG&E’s meter population being replaced with Smart Meters, the impact of a single anomaly
26 can have significant negative impacts resulting in “many” meter failures.

⁴² Exhibit ORA-13, p. 17, footnote 37.

⁴³ Exhibit ORA-13, p. 17, lines 7-8.

1 As presented in my direct testimony,⁴⁴ I am requesting \$100,000 for a Principal Engineer
2 who will develop and manage the repeatable firmware/hardware testing process, which will be a
3 part of Electric Metering Operations' continuous improvement and Quality Assurance program.
4

5 **TY 2016 activities cannot be funded by a reallocation of BY 2013 adjusted-recorded**
6 **expenses.**

7
8 ORA states the following:

9
10 "SDG&E's adjusted-recorded expenses (2009-2013) for its AMO also include overtime
11 costs, and costs incurred for one-time, non-recurring and unusual activities (expenses
12 incurred that are not necessary or required to operate the utility business). SDG&E did
13 not consider and/or incorporate these embedded costs into its TY forecast for additional
14 positions and proposed activities."⁴⁵

15
16 SDG&E disagrees with ORA's assertion that portions of BY 2013 expenses can be
17 reallocated to fund SDG&E's TY 2016 incremental request. ORA is admitting that "additional
18 positions and proposed activities" require additional funding, but suggests or claims that
19 incremental funding can be found in "embedded" BY 2013 costs. ORA provides no facts or
20 analysis as to which SDG&E AMO activities in BY 2013 are "one-time, non-recurring and
21 unusual costs." ORA provided no workpapers that identified such activities and did not estimate
22 the BY 2013 expenses related to ORA's claim of "one-time, non-recurring and unusual
23 activities." ORA's assumed reallocation of BY 2013 expenses to new or incremental activities
24 can only be feasible if current ongoing activities can be eliminated or reduced. ORA has not
25 identified any specific activities in BY 2013 that can be eliminated or reduced. ORA has
26 effectively rejected funding for the following proposed new activities for AMO, none of which
27 ORA addressed on the merits as being unnecessary to customers.
28

⁴⁴ Exhibit SDG&E-14, p. BMB-14, beginning on line 12.

⁴⁵ Exhibit ORA-13, p. 19, lines 9-13.

- Smart Meter Extended Warranty

As presented in my direct testimony,⁴⁶ I am requesting \$22,000 to extend the warranty for Smart Meter Network devices. The original warranty ended in 2014. SDG&E renewed its warranty for network devices only based on a risk assessment and analysis of various replace/repair options as shown on AMO's supplemental workpaper⁴⁷. SDG&E's forecast represents one-fifth of the total warranty cost of \$110,000 as shown in my revised workpapers⁴⁸.

- Meter Reading

As presented in my direct testimony,⁴⁹ I am requesting \$117,000 for 1.8 FTEs to perform work that was previously performed by the Meter Reading department which was eliminated in 2012 as the result of Smart Meter deployment. The costs associated with verifying meter numbers and read data in order to process customer bills are merely transferring from the Meter Reading department to AMO.

- Smart Meter Operations Center – Exception Management (“SMOC-EM”) software

As presented in my direct testimony,⁵⁰ I am requesting \$159,000 for annual software maintenance and service fees resulting from the implementation of the software solution for the SMOC-EM capital project (project #13031).

In light of these facts and my foregoing rebuttal arguments, the Commission should reject ORA's arguments and accept SDG&E's request of TY 2016 AMO forecast of \$8,771,000.

b. Billing

ORA incorrectly claims that SDG&E's Billing TY 2016 expense forecast is not justified and that embedded BY 2013 adjusted-recorded expenses can fund proposed activities.

ORA asserts: “SDG&E's request for an increase of 15.10% over 2013 adjusted-recorded expenses is not justified.”⁵¹

⁴⁶ Exhibit SDG&E-14, p. BMB-13, beginning on line 11.

⁴⁷ Exhibit SDG&E-14-WP-R, pp. 18-19.

⁴⁸ Exhibit SDG&E-14-WP-R, p. 11.

⁴⁹ Exhibit SDG&E-14, p. BMB-16, beginning on line 1.

⁵⁰ Exhibit SDG&E-14, p. BMB-17, beginning on line 21.

⁵¹ Exhibit ORA-13, p. 20, lines 10-11.

1 ORA’s analysis and recommendations are flawed on many levels. First, ORA’s
2 calculation of SDG&E’s increase of 15.10% over BY 2013 adjusted-recorded for the Billing
3 workgroup is misleading as it does not adjust for the \$410,000 of SPP activities that are already
4 included in SDG&E rates as shown in Appendix C, Supplemental Tables, Attachment C.2. A
5 7.02% increase over BY 2013 adjusted-recorded expenses would be more accurate.

6 Furthermore, ORA largely disagrees that TY 2016 represents incremental activities to BY
7 2013 as shown in my direct testimony.⁵² For example, Billing has incremental activities related
8 to the growth in Net Energy Metering (“NEM”), to train staff due to the growing number of
9 accounts with interval data and time-of-use rate structures, and to support the implementation of
10 the Centralized Calculation Engine (“CCE”) capital project. ORA does not object to or dispute
11 the need for these activities they just don’t feel that they are incremental to BY 2013 adjusted-
12 recorded expenses (with the exception of NEM as discussed below). However, ORA proposes to
13 disallow most incremental funding needed to support these activities and ignored the analysis
14 supporting these additional activity levels between BY 2013 and TY 2016. In fact, Billing has
15 shown an 11.4% increase in adjusted-recorded expenses from 2009 – 2013 (see Table BMB-7)
16 due to increased activity levels.

17 ORA also claims, “Its adjusted recorded expenses showed a decrease of \$0.277 million
18 between 2013 and 2014”⁵³ and “SDG&E’s 2014 adjusted-recorded expenses of \$4.796 million is
19 \$0.340 million less than its 2014 forecast of \$5.136 million.”⁵⁴

20 ORA improperly assumes that 2014 adjusted-recorded expenses being less than BY 2013
21 adjusted-recorded expenses and the 2014 GRC forecast is relevant and should be used to call into
22 question the TY 2016 forecast. Because of SDG&E’s commitment to nearly \$3 million of
23 reductions by TY 2016, SDG&E must accelerate reductions in forecast year 2014 in order to
24 achieve the TY 2016 embedded cost reductions as shown in Appendix C.1. For example, the
25 forecast for the Billing workgroup includes savings from the implementation of the Off But
26 Registering capital project.⁵⁵ SDG&E has committed to efficiency gains by TY 2016 and
27 therefore is attempting to achieve these efficiency gains in 2014 and 2015. SDG&E disagrees
28 with ORA’s assumptions and urges the CPUC to fully fund these incremental activities.

⁵² Exhibit SDG&E-14, p. BMB-21, beginning on line 11 to BMB-26.

⁵³ Exhibit ORA-13, p. 21, lines 2-3.

⁵⁴ Exhibit ORA-13, p. 21, lines 5-6.

⁵⁵ Exhibit SDG&E-14, p. BMB-21, Table 9.

1 ORA also speculates: “SDG&E’s adjusted-recorded expenses fluctuated between 2009
2 and 2011, averaging \$4.509 million for the three year period.”⁵⁶ and then “...increased and
3 remained stable between 2012 and 2013 averaging \$5.038 million for the two years.”⁵⁷ and that
4 “The highest recorded expense level for the six year period (2009-2014) was in 2013 of \$5.073
5 million.”⁵⁸

6 The assertion that the BY 2013 Billing adjusted-recorded expense level is sufficient to
7 fund TY 2016 expenses is flawed. As stated in my direct testimony,⁵⁹ because Billing has
8 changed significantly due to Smart Meter deployment, BY 2013 adjusted-recorded expenses
9 provide a reasonable starting point. However, to complete the analysis, the requested
10 incremental expenditures as shown in my direct testimony⁶⁰ should be evaluated on their merits
11 by the Commission and funded appropriately as additions to the BY 2013 starting point.

12 ORA further speculates that “SDG&E has embedded historical costs associated with its
13 New Rate Options and Programs (i.e., one-time development costs, training costs, etc.) that can
14 be reallocated in the TY for proposed activities.”⁶¹

15 SDG&E disagrees with ORA’s assertion that portions of BY 2013 expenses can be
16 reallocated to fund SDG&E’s TY 2016 incremental request. In fact, historical expenditures for
17 New Rate Options and Programs are not one-time expenses. Three of the positions are Business
18 Systems Analysts who supported the implementation of the Smart Pricing Program (“SPP”) and
19 are now supporting the ongoing maintenance and technical support. The remaining two
20 positions are Billing Analysts that are responsible for managing the billing of customers on the
21 SPP rates. All of these positions are explained in detail in my direct testimony⁶² and are
22 providing ongoing support. In addition, these positions are currently being funded through the
23 Dynamic Pricing Balancing Account (“DPBA”). As described above,⁶³ the CPUC authorized
24 SDG&E to request funding for post-2015 operational costs as part of a future GRC.⁶⁴ SPP

⁵⁶ Exhibit ORA-13, p. 20, lines 11-12.

⁵⁷ Exhibit ORA-13, p. 21, lines 1-2.

⁵⁸ Exhibit ORA-13, p. 21, lines 4-5.

⁵⁹ Exhibit SDG&E-14, p. BMB-21, line 2-9.

⁶⁰ Exhibit SDG&E-14, p. BMB-21, beginning on line 11 to BMB-26

⁶¹ Exhibit ORA-13, p.20, footnote 49.

⁶² Exhibit SDG&E-14, p. BMB-22, starting on line 18 to BMB-24.

⁶³ See Section III.A.1 under the heading “ORA ignores almost all of SDG&E’s request for ongoing support for the Smart Pricing Program for Customer Service Operations.”

⁶⁴ CPUC D.12-12-004, pp. 16-17 and Ordering Paragraph 15.

1 expenses are now funded through 2015 in the DPBA. In fact, ORA appears to recognize that
2 these are not one-time expenses and proposed incremental funding for this activity, although for
3 only one-third of the expense (see discussion under “Faulty ORA calculation for New Rate
4 Options and Programs” in Section III.A.b below.) Any disallowance will have a direct impact on
5 SDG&E’s customers as there will be a delay with setting up customer accounts, processing
6 monthly bills, and configuring rate changes in SDG&E’s Energy Manage Tool (“EMT”), which
7 customers use to understand their energy usage and compare rate options.

8 Similarly, ORA also speculates “SDG&E’s historical expenses also include one-time
9 non-recurring and unusual costs (expenses incurred for activities that are not necessary or
10 required to operate the utility business; SDG&E response to ORA-SDG&E-051-TLG, Q9) that
11 can be reallocated for TY activities.”⁶⁵

12 ORA is admitting that additional positions and proposed activities require additional
13 funding, but suggests or claims that incremental funding can be found in “embedded” BY 2013
14 costs. ORA provides no facts or analysis as to which SDG&E Billing activities in BY 2013 are
15 “one-time, non-recurring and unusual costs.” ORA provided no workpapers that identified such
16 activities and did not estimate the BY 2013 expenses related to ORA’s claim of “one-time, non-
17 recurring and unusual activities.” ORA’s assumed reallocation of BY 2013 expenses to new or
18 incremental activities can only be feasible if current ongoing activities can be eliminated or
19 reduced. ORA has not identified any specific activities in BY 2013 that can be eliminated or
20 reduced. ORA has effectively rejected funding for SDG&E’s proposed new activities.

21 ORA implicitly rejects the need for an additional Project Advisor in the amount of
22 \$86,000 as requested under the “Increased Complexity of Activities” cost driver in my direct
23 testimony.⁶⁶ This ignores the upward pressure that the growth in interval billed accounts (over
24 89% annually from BY 2013 to TY 2016⁶⁷) will place on the existing training staff. As
25 presented in my direct testimony,⁶⁸ Billing employees must be properly trained to maintain
26 accurate and timely billing for SDG&E’s customers. In PG&E’s TY 2014 GRC decision, the
27 CPUC recognizes the importance of employees receiving training driven by new and increased

⁶⁵ Exhibit ORA-13, footnote 49, p.20.

⁶⁶ Exhibit SDG&E-14, p. BMB-24, beginning on line 5.

⁶⁷ Exhibit SDG&E-14-WP-R, p. 37.

⁶⁸ Exhibit SDG&E-14, p. BMB-24, beginning on line 5.

1 processing of interval data and interval-based billing. The CPUC adopted PG&E's TY 2014
2 GRC forecast for four additional staff to perform this activity.⁶⁹

3 In addition, ORA's witness did not take issue with any of SDG&E's proposed Customer
4 Service IT capital projects,⁷⁰ but disallowed the associated TY 2016 expense forecast of \$76,000
5 to fund a Business System Analyst to support and maintain the CCE system (project #14013).⁷¹
6 The Business System Analyst is needed to support the configuration and maintenance of the
7 CCE which will be required any time prices change or new rates are introduced. With over
8 65,000 price updates per year and with new rates and prices being frequently added and changed,
9 this position is necessary to avoid configuration delays and potential for increased errors in
10 calculations used by customers and internal resources to make financial decisions regarding rate
11 options and potential cost savings.

12 In light of these facts and my foregoing rebuttal arguments, the Commission should reject
13 ORA's arguments and accept SDG&E's request of TY 2016 Billing forecast of \$5,839,000.

14
15 **SDG&E is not seeking the same NEM positions as from the TY 2012 GRC.**

16
17 ORA asserts the following:

18
19 "SDG&E was authorized funding for additional FTEs in its 2012 GRC for Net Energy
20 Metering activities, and SDG&E is requesting funding for those same positions again in
21 its 2016 GRC. SDG&E's ratepayers should not be charged twice for the same
22 positions."⁷²

23
24 ORA erroneously states that SDG&E is requesting NEM positions in TY 2016 that had
25 been previously authorized funding in its TY 2012 GRC. ORA ignores the continued growth in
26 NEM; there were over 17,400 additional NEM customers in 2014 compared to BY 2013 which
27 equates to over a 54.54% increase and a total NEM population of almost 50,000 customers.
28 They also ignore the adoption of CPUC D.14-03-041, which established a transition period of 20

⁶⁹ D.14-08-032, pp. 293-294.

⁷⁰ Exhibit ORA-13, p. 1, lines 16-20.

⁷¹ Exhibit SDG&E-14, p. BMB-25, beginning on line 13.

⁷² Exhibit ORA-13, p. 21, lines 7-10.

1 years for existing NEM customers as of July 1, 2017 (or earlier if the 5% NEM cap is reached)
2 and D.14-05-003, which permits energy storage devices to be paired/interconnected with NEM
3 facilities. These decisions increase the level of billing complexity causing the need for
4 additional NEM positions. As presented in my direct testimony,⁷³ these new positions to support
5 NEM growth are not duplicative of positions authorized in SDG&E's TY 2012 GRC and already
6 filled within the Billing organization. In other words, the TY 2016 request for additional NEM
7 billing analysts positions are incremental to the currently filled NEM positions authorized in the
8 TY 2012 GRC. In fact, if SDG&E had not accounted for the NEM capital project (project
9 #13012) in its NEM growth forecast, SDG&E would have requested another four FTEs as part of
10 its TY 2016 request as shown in workpapers.⁷⁴ Furthermore, this request is consistent with the
11 CPUC's findings in PG&E's TY 2014 GRC decision wherein they adopt PG&E's forecast of
12 \$300,000 to hire additional billing resources to support the growth in NEM.⁷⁵

13
14 **Faulty ORA calculation for New Rate Options and Programs.**

15
16 ORA states the following:

17
18 "ORA's forecast of \$5.210 million includes incremental funding of \$137,000 for
19 SDG&E's New Rate Options Program. ORA normalized SDG&E's forecast (\$410,000/3
20 years = \$137,000) to calculate incremental TY funding."⁷⁶

21
22 ORA supports SDG&E's New Rate Options and Programs request but for some unknown
23 reason divides the annual TY 2016 expense forecast of \$410,000 by three years reducing the
24 requested amount by two-thirds (\$273,000) based on a "normalized" calculation. In its
25 testimony, ORA provided no rationale for this arbitrary reduction. Therefore, SDG&E submitted
26 a data request to ORA asking them to explain its calculation (see ORA response to SEU-ORA-
27 DR-3 Q2 a-6 in Appendix B).

28

⁷³ Exhibit SDG&E-14, p. BMB-21, beginning on line 14.

⁷⁴ Exhibit SDG&E-14-WP-R, p. 35.

⁷⁵ D.14-08-022, p. 298.

⁷⁶ Exhibit ORA-13, pp. 19-20, footnote 47.

1 ORA responded to Question 2a as follows:

2 “ORA’s forecast of \$5.210 million for SDG&E’s Billing work group includes
3 incremental funding of \$137,000 for SDG&E’s New Rate Options Program. ORA
4 calculated the incremental funding as follows: $\$410,000/3 \text{ years} = \$137,000$ (\$136,666
5 rounded up to \$137,000).”

6
7 ORA responded to Question 2b as follows:

8 “Regarding “an explanation for what ORA means by “normalizing” and what the purpose
9 is of normalizing an annual expenditure”, please note the following: ORA normalized
10 SDG&E’s forecast of \$410,000 (divided the forecasted amount over three years) for its
11 New Rate Options Program because SDG&E has embedded funding that can be
12 reallocated in the TY for this activity. As discussed on page 21 in ORA’s testimony,
13 SDG&E requested \$5.765 million and was authorized \$5.543 million in its TY 2012
14 GRC for its Billing work group. SDG&E’s 2012-2014 adjusted-recorded expenses for
15 this work group averaged \$4.957 million, which is less than its 2012 GRC authorized
16 funding.”

17
18 SDG&E finds ORA’s explanation incongruous. ORA indicates they divided the forecast
19 over three years because SDG&E has embedded funding that can be reallocated in the TY for
20 this activity. If this is the case, why didn’t the ORA “normalize” other incremental activities that
21 they claim SDG&E has embedded funding that can be used. This further supports SDG&E’s
22 position that ORA’s blanket approach to using embedded funding for TY 2016 incremental
23 activities is illogical. This is also another example of where ORA tries to make the claim
24 SDG&E has unused expenses because BY 2013 adjusted-recorded expenses were less than TY
25 2012 authorized. While this might be true for the Billing workgroup, the overall Customer
26 Service organization was within 1.0% of its TY 2012 authorized amount and BY 2013 adjusted-
27 recorded expenses. Therefore, unlike ORA’s assertions, effectively there are no embedded
28 funding exists. Thus, since new rate options and programs are ongoing and will continue to
29 expand even beyond TY 2016, ORA’s proposed reduction should be denied and the full amount
30 of \$410,000 approved.

1 In light of these facts and my foregoing rebuttal arguments, the Commission should reject
2 ORA's proposal and approve SDG&E's TY 2016 Billing forecast of \$5,839,000.

3
4 **c. Branch Offices and Authorized Payment Locations**

5
6 **ORA's fundamental argument for not supporting SDG&E's request to close its**
7 **Branch Offices is flawed on many counts.**

8
9 ORA states the following:

10
11 "SDG&E's adjusted-recorded expenses have been relatively stable between 2009-2014
12 for its Branch Offices work group in spite of declining Branch Office payments. Instead
13 of making unsupported general statements about the impact on customers, SDG&E needs
14 to conduct customer surveys and research to obtain feedback directly from the customers
15 who use the Branch Offices it proposes to close. Doing this will assist SDG&E in
16 determining why a large percentage of its customers pay their bills with cash, what its
17 customers consider "diminished" services, and why customers prefer to utilize the Branch
18 Offices. SDG&E should also find out and report to the Commission if the customers
19 using the Branch Offices SDG&E proposes closing, will be inconvenienced, and if they
20 have the resources SDG&E assumes they have in order to use self-services, or if they
21 have the extra money SDG&E assumes they have for bus fare to go three to six miles
22 away to another Branch Office."⁷⁷

23

⁷⁷ Exhibit ORA-13, p. 26, lines 4-16.

1 ORA basically believes SDG&E should conduct customer research prior to closing the
2 offices to determine:

- 3 • whether customers prefer using a Branch Office
- 4 • why a large percentage of customers pay with cash
- 5 • what customers consider diminished services
- 6 • whether customers think they will be inconvenienced
- 7 • whether low-income customers have extra money for bus fare to get to another
8 branch office

9
10 **First, there are already existing facts that prove customers do not necessarily prefer**
11 **using a Branch Office.**

12
13 While the total number of in-person payments has declined largely due to self-service
14 options, the percentage of in-person payments at APLs have increased compared to in-person
15 payments made at Branch Offices. In fact, since 2009 the total in-person payments made at
16 APLs within SDG&E's service territory has increased from approximately 23% in 2009 to
17 approximately 27% in BY 2013 as shown in Table BMB-8.

18
19 **TABLE BMB-8**
20 **Branch Office and APL Volume of Payments**

	2009	2010	2011	2012	2013
Oceanside	14,560	22,667	21,514	17,527	14,722
APL within 5 Miles	1,731	5,545	11,675	28,914	34,406
% Pmts at APLs	10.6%	19.7%	35.2%	62.3%	70.0%
Downtown	39,344	38,472	37,905	35,799	33,785
APL within 5 Miles	9,752	12,761	18,049	21,154	25,521
% Pmts at APLs	19.9%	24.9%	32.3%	37.1%	43.0%
National City	106,653	105,867	117,522	112,548	109,302
APL within 5 Miles	32,048	22,957	23,223	29,902	37,864
% Pmts at APLs	23.1%	17.8%	16.5%	21.0%	25.7%
Total SDG&E B.O.	936,490	912,016	923,956	866,007	828,833
Total SDG&E APL	285,322	280,260	302,917	286,491	298,114
% Pmts at APLs	23.4%	23.5%	24.7%	24.9%	26.5%

1 Similarly, the percentage of in-person payments made at APLs within a five mile radius
2 of the three Branch Offices SDG&E is proposing to close have also increased (see Table BMB-8
3 above).

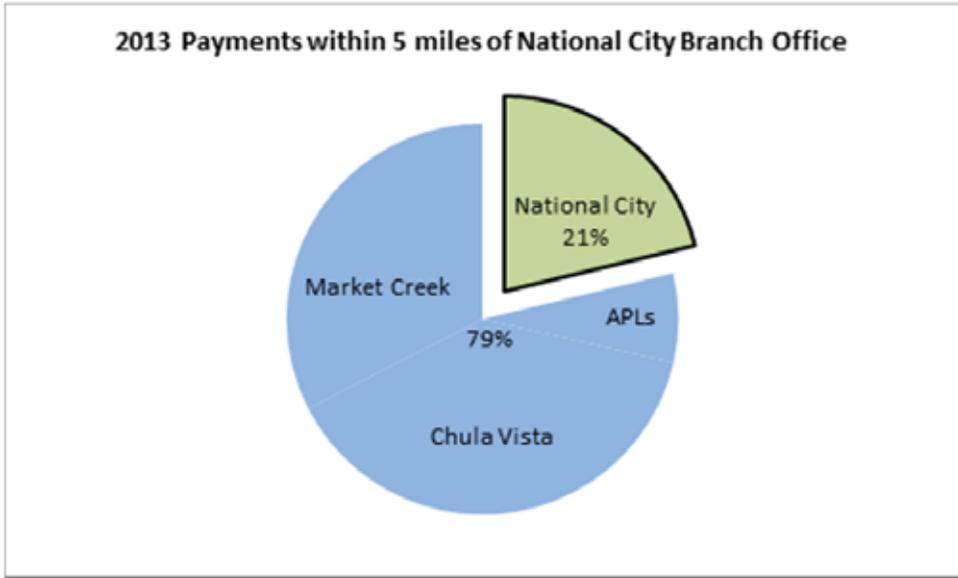
4 When compared with the overall BY 2013 average of 27% for all in-person payments
5 being made at an APL, the Oceanside Branch Office area APLs comprised 70% of in-person
6 payments meaning that 7 out of 10 customers that make in-person payments in this area do so at
7 an APL. Only 3 of 10 customers in this area use the Branch Office in this area for an in-service
8 payment.

9 The Downtown Branch Office area APLs comprised 43% of in-person payments, and the
10 National City Branch Office area APLs comprised 26% of in-person payments. While the
11 National City Branch Office area is approximately the same as the overall average, this can
12 likely be attributed to the fact that there are two additional full-service SDG&E Branch Offices
13 within the five mile radius of the National City Branch Office. While the total percentage of
14 APL in-person payments for the National City Branch Office is only 26%, the total number of all
15 in-person payments within a five mile radius of National City is 78.8% when the other two
16 Branch Offices are included (see Chart BMB-1 and Table BMB-9). In other words, almost 8 out
17 of 10 in-person payments within a five mile radius of our National City Branch Office are made
18 at a location other than the National City Branch Office.

19 It is also worth noting in 2009 there were anomalous results for the National City office
20 as it was closed for renovations. The National City Branch Office was closed for approximately
21 three months to comply with the ADA standards pursuant to the Memorandum of Understanding
22 between Disability Rights Advocates, SoCalGas and SDG&E, which was adopted in D.08-07-
23 046.

1

CHART BMB-1



2

3

4

TABLE BMB-9

Payments Within Five Miles of National City Branch Office

Branch Office	2009	2010	2011	2012	2013
National City	106,653	105,867	117,522	112,548	109,302
APL within 5 Miles	32,048	22,957	23,223	29,902	37,864
Chula Vista	232,453	229,689	228,600	213,404	200,201
Market Creek	189,087	188,067	186,966	174,317	167,738
% Pmts National City	19.0%	19.4%	21.1%	21.2%	21.2%

6

7

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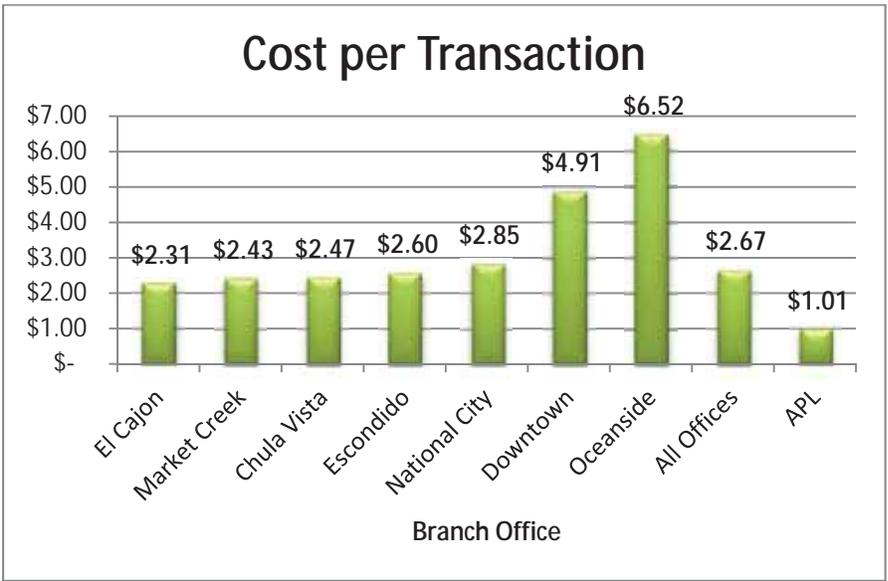
12

In addition, as presented in my direct testimony,⁷⁸ customer preferences over the last several years show self-service options have grown significantly and traditional payment options, such as making a payment at a Branch Office, has declined. In 2009, 49% of customers made payments via self-service and in BY 2013, 63% of customers made payments via self-service.

⁷⁸ Exhibit SDG&E-14, p. BMB-42, Chart 4.

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CHART BMB-2
Branch Office Cost Per Transaction



The overwhelming majority of transactions handled at SDG&E’s Branch Offices are payment transactions (97%). The remaining three percent of transactions are non-payment related which customers may still conduct via self-service option of My Account or by contacting the Customer Contact Center (“CCC”) at their convenience, via SDG&E’s toll free number. Customers can also conduct non-payment transactions at nearby APLs where customers already conduct business daily, such as grocery and convenience stores, by using the courtesy phones that connect directly to the CCC at some locations. There are currently a combined total of 29 APLs⁸² in the vicinity of the Downtown, National City, and Oceanside offices that will provide a comparable level of service by accepting payments with cash, and checks or debit cards. Many APLs are located in major chain stores where customers frequently shop (e.g., Walmart and Kmart) and have longer operating hours that extend beyond SDG&E’s Branch Offices. Customer preferences over the last several years have revealed that self-service options have grown significantly and traditional payment options, such as making a payment at a Branch Office, have declined.⁸³ This can be attributed to the increased availability and

⁸² See Appendix C, Supplemental Tables, Attachment C.4 for a list of SDG&E’s current APLs and the proximity to these locations.
⁸³ According to the August 2012 J.D. Power and Associates Customer Impact Report: Mobile Customer Interaction, if a utility’s mobile website and/or app includes viewing energy usage, billing and payment

1 sophistication of self-service payment options including paying through My Account, Bill
2 Matrix,⁸⁴ home banking, direct debit, electronic data interchange (“EDI”), and pay-by-phone
3 through SDG&E’s IVR System. Other traditional payment options are still available, such as
4 mail and APLs, making the need to visit a Branch Office often unnecessary.

5 As a result of closing the Downtown, National City and Oceanside Branch Offices,
6 SDG&E customers will realize annual cost savings of approximately \$400,000 per year in
7 operational costs less one-time closure expenses of approximately \$85,000.⁸⁵

8 In sum, requiring SDG&E to conduct a customer survey is unnecessary and would only
9 delay implementation. Accordingly, in the interest of SDG&E’s customers as a whole, the
10 Commission should approve the closure of the three Branch Offices (Downtown, Oceanside and
11 National City) and permit SDG&E to pass the associated cost savings onto its customers.

12
13 **Third, it is not true that customers who wish to pay cash must use a Branch Office.**

14
15 ORA also mischaracterizes or falsely implies that closing the offices would preclude
16 customer cash transactions. This inference or implication is blatantly false. All APLs accept
17 cash payments and customers making cash payments at the National City Branch Office need
18 only walk 20 feet to make the same payment at an adjacent APL in the same strip mall.
19 Furthermore, SDG&E has an agreement with Walmart that with each new store that goes in our
20 service territory for this major chain a new APL will go in as well. Even more so, APLs have
21 extended hours during weekdays and are open during weekends. In other words, most customers
22 making payments at the current Oceanside, National City, and Downtown San Diego Branch
23 Offices will have a sufficient and reasonable number of payment location options and greater
24 available APL business hours.

25

options/account management, and reporting emergencies (outages or leaks) the utilities are well on their way to meeting customers’ preferences.

⁸⁴ Customers can use most ATM cards, debit cards, MasterCard® and Visa® credit cards and electronic checks to pay their bill. These payment options are offered through BillMatrix, an independent service provider.

⁸⁵ The savings and one-time costs are not reflected in the Branch Office TY 2016 forecast. Adjustments will need to be made to SDG&E’s authorized revenue requirement if SDG&E’s proposal is approved. See supplemental workpaper 2 attached to Ex. SDGE-14-WP-R 100005, pp. 85-87, for a breakdown of the total savings.

1 **Fourth, SDG&E is committed to maintaining its high customer service standards at**
2 **its APLs.**

3
4 SDG&E is committed to maintaining high customer service standards at its APLs.
5 SDG&E has a dedicated team who oversees all APLs. The team includes an APL Advisor
6 whose responsibilities include:

- 7 • Pre Enrollment Site Evaluation

8 Pre-Enrollment Site Evaluation is a process to assess prospective agents. The APL
9 Advisor evaluates prospective agents for geographical location in proximity to SDG&E's Branch
10 Offices and existing APLs, accessibility to public transportation, other business offerings,
11 staffing levels, and customer courtesy.

- 12 • Site Evaluation

13 Site Evaluation is a process to ensure SDG&E standards continue to be maintained. The
14 APL Advisor visits each APL once annually, at a minimum, to observe the presence and
15 visibility of APL signage, hours of operation, legibility of payment receipts, staffing levels,
16 customer wait times and service delivery. An overall rating is assigned and 91% or greater is
17 determined acceptable. Customer complaints received between visits are also taken into
18 consideration and may impact the overall rating. APLs rated lower than 91% are revisited until
19 satisfactory rating is attained.

- 20 • Customer Satisfaction Surveying

21 Customer Satisfaction Surveying is utilized to gauge APL service delivery. Customers
22 are randomly selected to participate by a third party service provider. Customers are requested to
23 rate the service quality overall, service quality of the representative as well as the facility.
24 Customers are also provided an opportunity to explain the reasons for their ratings. The APL
25 Advisor regularly reviews results and takes appropriate follow-up actions.

- 26 • Customer Comment Tracking

27 Customer Comment Tracking is an additional process utilized to capture customer
28 feedback. Customer Comment Tracking is managed within SDG&E and initiated by customers
29 calling into our CCC. Customer complaints, compliments, comments and suggestions are
30 documented and routed for resolution. Feedback related to an APL experience is reviewed by
31 the APL Advisor for appropriate follow-up action.

- Relationship Management

Additionally, as mentioned below, like the Branches Offices, several of the APLs perform positive identification (“POS ID”) and have a courtesy phone that connects directly to SDG&E’s CCC.

Fifth, customers will not be unduly inconvenienced.

As presented in my direct testimony,⁸⁶ customers will not be unduly inconvenienced as they have many APLs to choose from that are close in proximity to National City, Oceanside, and Downtown Branch Offices. Our network of APLs has grown. We currently have 64 locations which is a 25% increase from SDG&E’s TY 2012 GRC. Table BMB-11 shows the distance of SDG&E’s current APLs to the Oceanside, National City, and Downtown Branch Offices.

TABLE BMB-11
Proximity of Branch Offices to Nearest APLs

Branch Office	< 1 mile	< 2 miles	< 3 miles	< 4 miles	< 5 miles
Oceanside	0	2	5	5	7
National City⁸⁷	2	4	5	9	13
Downtown⁸⁸	1	3	5	6	9

Out of the seven APLs within five miles of the Oceanside office, there is one that offers POS ID only which is within four miles. There is also one that offers a courtesy phone and POS ID which is within five miles.

Out of the 13 APLs that are currently within five miles of the National City office, there is one APL right next door that offers both POS ID and a courtesy phone. There are two that

⁸⁶ Exhibit SDG&E-14, p. BMB-41, Table 21.

⁸⁷ In addition to APLs, there is a full-service SDG&E Branch Office within three miles and an additional full-service SDG&E Branch Office within five miles.

⁸⁸ There is also a full-service SDG&E Branch Office within six miles.

1 offer POS ID only; one is within two miles and one is within four miles. There is one APL
2 within four miles that offers a courtesy phone only.

3 Out of the 9 APLs within five miles of the Downtown office, there is one within two
4 miles that offers both POS ID and a courtesy phone. There are three that offer POS ID only; one
5 within one mile, one within three miles, and one within five miles.

6 Furthermore, the Oceanside, Downtown, and National City Branch Offices have either
7 moved or temporarily closed in the past and customers found convenient alternatives for making
8 their payments. In fact, the Oceanside office moved three different times since 2003. The
9 following Table BMB-12 provides the old location, new location, and distance for the Oceanside
10 Branch Office moves. In addition, the table shows the type of office - SDG&E, California Coast
11 Credit Union or UPS Store.

12 **TABLE BMB-12**
13 **Oceanside Branch Office Relocations**

Old Location	New Location	Distance From Previous Location (miles)
4200 Oceanside Blvd. (SDG&E)	3910 Vista Way (SDG&E)	4.9
3910 Vista Way (SDG&E)	3485 Marron Road (California Coast Credit Union)	0.69
3485 Marron Road (County Coast Credit Union)	2604-B El Camino Real CB (UPS Store)	3.36

14
15 The following Table BMB-13 provides the old location, new location, and distance for
16 the Downtown Branch Office move. The table also shows what type of office - SDG&E or
17 California Coast Credit Union.

18 **TABLE BMB-13**
19 **Downtown Branch Office Relocation**

Old Location	New Location	Distance From Previous Location (miles)
101 Ash Street (SDG&E)	440 Beach Street (California Coast Credit Union)	0.29

20
21
22 As previously mentioned, in 2009 the National City Branch Office was closed for
23 approximately three months for renovations to comply with the ADA standards pursuant to the

1 Memorandum of Understanding between Disability Rights Advocates, SoCalGas and SDG&E,
2 which was adopted in D.08-07-046. SDG&E addresses this further below to rebut ORA's
3 concern with the renovations.⁸⁹

4 During the moves and temporary closure, SDG&E did not receive any complaints from
5 its customers with the exception of one issue regarding the Escondido relocation. The customer
6 said signs were not posted at the old location advising customers of the new location. If the
7 Commission approves the office closures, SDG&E fully intends to place signs at the old office
8 informing customers of the local APLs and the closest Branch Office. In fact, as stated in my
9 direct testimony,⁹⁰ SDG&E plans an extensive communication plan to affected customers,
10 including distributing advance multi-language notices, newspaper ads, direct mail, flyers, Branch
11 Office signage, notices on sdge.com, and meeting with local agencies and officials.

12
13 **ORA also incorrectly implies customers paying at APLs are more likely to be**
14 **disconnected than customers paying at Branch Offices.**

15
16 ORA states the following:

17
18 "There is a delay with APL payments that post hourly (during hours when a customer
19 may be disconnected). Customers are given confirmation numbers at the time of payment
20 that can be used to cancel disconnections."⁹¹

21
22 ORA's allusion that customers may get disconnected due to the frequency of a payment
23 memo posting at an APL versus a Branch Office is unwarranted. As stated in SDG&E's
24 response to ORA-SDG&E-051-TLG Q12-c, customers are given a confirmation number at the
25 time of payment that can be used to immediately contact the CCC to cancel disconnection.
26 Also, SDG&E's data request response indicated (which ORA neglects to quote in its testimony)
27 that SDG&E is not aware of any customers having issues resulting from the memo post delay
28 (see SDG&E response to ORA-SDG&E-DR-051-TLG, Question 12c in Appendix A,

⁸⁹ See Section III.A.1.c under the heading "ORA questions why SDG&E renovated its National City and Oceanside Branch Offices in 2009 and now proposes to close them."

⁹⁰ Exhibit SDG&E-14, p. BMB-48, starting on line 11 to BMB-49.

⁹¹ Exhibit ORA-13, p. 22, footnote 56.

1 Attachment A.3). Furthermore, the timing delay of payment memo posting did not prevent
2 SDG&E from receiving CPUC approval to close its Mountain Empire and San Clemente Branch
3 Offices in 2006 at which time there was also a delay with payments posting at APLs.⁹²
4

5 **Finally, SDG&E’s low income customers will not being disadvantaged.**

6
7 ORA claims the following:

8
9 “Many of SDG&E’s customers who use the offices that SDG&E proposes to close are
10 low income with limited resources, and may not have established bank accounts to pay
11 their bills on-line or on a mobile phone.”⁹³
12

13 As presented in my direct testimony, the median household income in the areas where the
14 offices are located was higher in BY 2013 than the BY 2013 CARE program income guidelines
15 of \$39,060. The median household income in BY 2013 was \$49,555 for National City⁹⁴,
16 \$46,690 for Downtown San Diego⁹⁵, and \$67,639⁹⁶ for Oceanside.

17 Furthermore, SDG&E is not proposing that customers who currently use the Branch
18 Offices will need to switch to self-service options. As stated above, there are currently a
19 combined total of 29 APLs⁹⁷ in the vicinity of the Downtown, National City, and Oceanside
20 offices that will provide a comparable level of service by accepting payments with cash, and
21 checks or debit cards. Many APLs are located in major chains where customers frequently shop
22 (e.g., Walmart and Kmart) and have longer operating hours that extend beyond SDG&E’s
23 Branch Offices. If customers would like to choose a self-service option, there is a study by the
24 Department of Health and Human Services that shows that approximately 98.5% of California
25 households have telephone service (wireless, landline, or both).⁹⁸ The Public Policy Institute of

⁹² CPUC Resolution E-3991.

⁹³ Exhibit ORA-13, p. 23, lines 10-12.

⁹⁴ Exhibit SDG&E-14, p. BMB-45, lines 12-13.

⁹⁵ Exhibit SDG&E-14, p. BMB-46, lines 22-23.

⁹⁶ Exhibit SDG&E-14, p. BMB-47, lines 29.

⁹⁷ See Appendix C, Supplemental Tables, Attachment C.4 for a list of SDG&E’s current APLs and the proximity to these locations.

⁹⁸ “Wireless Substitution: Early Release of Estimate from the National Health Interview Survey,” January – June 2013, Department of Health and Human Services, National Center for Health Statistics, Dec. 2013

1 California (“PPIC”) reported, “nearly all Californians (92%) say they have a cell phone, and 58
2 percent of them have a smartphone – up from 39 percent in 2011. Most Californians (56%) use
3 their cell phones to access the Internet or email – up 37 points since 2008 and 16 points from
4 2011.”⁹⁹ In addition, PPIC reported that 77% of California households with income of less than
5 \$40,000 have internet access. Note that all three areas where SDG&E has proposed office
6 closures have 2013 income levels well above the \$40,000 income level stated in the PPIC
7 report.¹⁰⁰

8 ORA also asserts that SDG&E assumes its “...CARE program customers on
9 limited/fixed incomes have extra money to pay to ride buses three to six miles away to another
10 Branch Office or APL.”¹⁰¹ In my direct testimony, I provided information regarding local
11 transportation because the information is one of the criteria required when SoCalGas requests to
12 close an office.¹⁰² SDG&E felt this information would be useful to the Commission.

13 The sheer fact is CARE customers have many options for making payments.

14
15 ORA takes issue with two additional items which are not relevant to SDG&E’s proposal.

16
17 **ORA implies SDG&E does not plan to reduce TY 2016 request if Branch Office**
18 **closures are approved.**

19
20 ORA states the following:

21
22 “Ex. SDG&E-14, p. BMB-38. SDG&E’s TY 2016 forecast does not include savings for
23 the proposed Branch Office closures (SDG&E response to ORA-SDG&E-051-TLG, Q.
24 14-f).”¹⁰³

at p. 8. See <http://www.cdc.gov/nchs/data/nhsr/nhsr070.pdf>

⁹⁹ PPIC: “Californians & Information,” June 2013.

¹⁰⁰ “California’s Digital Divide,” Public Policy Institute of California: June 2013 at p. 7.

¹⁰¹ Exhibit ORA-13, p. 23, beginning on line 15.

¹⁰² As set forth in CPUC D.08-07-046.

¹⁰³ Exhibit ORA-13, p. 21, footnote 53.

1 In my direct testimony¹⁰⁴ and in the following response to question 14f (see SDG&E
2 response to ORA-SDG&E-DR-051-TLG, Question 14f in Appendix A, Attachment A.4) I was
3 very clear why the savings were not included:
4

5 “SDG&E did not include the proposed savings in its TY 2016 GRC for the closure of its
6 Branch Offices because SDG&E is not presuming the outcome of the Commission’s
7 disposition of SDG&E’s request for closure. If the Commission approves SDG&E’s
8 closure request, then SDG&E will reduce revenue requirements to reflect the net savings
9 (annual savings net costs to achieve). These savings will reflect effective timing of actual
10 closure for each specific office during the first calendar year of closure and then
11 subsequent year annual savings.”
12

13 Thus, SDG&E will reduce its revenue requirement to reflect the net savings if the
14 Commission approves closure of its Branch Offices.
15

16 **ORA questions why SDG&E renovated its National City and Oceanside Branch**
17 **Offices in 2009 and now proposes to close them.**
18

19 ORA states the following:
20

21 “SDG&E’s testimony does not explain why it incurred costs in 2009 to renovate its
22 National City and Oceanside Branch Offices and now proposes to close those renovated
23 Branch Offices. SDG&E states ‘Note: Slightly lower 2009 transaction volume at National
24 City and Oceanside Branches due to temporary office closure for renovations
25 (approximately 12 weeks and approximately 4 weeks, respectively).’ (Ex. SDG&E-14, p.
26 BMB-39)¹⁰⁵
27

28 The only purpose of mentioning the National City and Oceanside Branch Office
29 renovations was merely to state, in the spirit of transparency, that the transaction volumes for

¹⁰⁴ Exhibit SDG&E-14, p. BMB-43, footnote 38.

¹⁰⁵ Exhibit ORA-13, p. 22, footnote 54.

1 these offices during 2009 were slightly lower due to renovations.¹⁰⁶ The offices were renovated
2 to comply with the ADA standards pursuant to the Memorandum of Understanding between
3 Disability Rights Advocates, SoCalGas and SDG&E, which was adopted in D.08-07-046. At the
4 time the offices were renovated SDG&E had no plans to propose closing these offices. ORA's
5 point has no merit or relevance.

6 For all the reasons described above and because SDG&E will provide notice to its
7 customers in the three communities in multiple languages as described in my direct testimony,¹⁰⁷
8 the Commission should reject ORA's proposal to have SDG&E conduct a customer survey and
9 adopt the closure of SDG&E's National City, Downtown, and Oceanside Branch Offices.

10
11 **d. Customer Contact Center ("CCC") Operations**

12
13 **ORA denies funding Commission ordered CARE enrollment expense.**

14
15 ORA states the following:

16
17 "ORA adjusted SDG&E's forecast by \$72,000 to remove costs associated with California
18 Alternate Rates for Energy (CARE) program enrollment costs. The Commission ordered
19 and SDG&E "agreed to seek funding for this activity as part of its Low Income Programs
20 proceeding."¹⁰⁸

21
22 SDG&E disagrees with ORA's adjustment of \$72,000 to remove CARE enrollment costs
23 from the CCC Operations TY 2016 forecast. As stated in my direct testimony,¹⁰⁹ starting in TY
24 2016 SDG&E proposed to have Energy Services Specialists ("ESS") in the CCC to assist
25 customers with CARE enrollments as agreed to in the Residential Disconnection OIR¹¹⁰
26 settlement agreement adopted by CPUC D.14-06-036. ORA indicates the CPUC ordered and
27 SDG&E agreed to seek funding for this activity as part of its Low Income proceeding. First, the

¹⁰⁶ Exhibit SDG&E-14, p. BMB-39, lines 4-6.

¹⁰⁷ SDG&E Exhibit SDG&E-14, p. BMB-48, beginning on line 12.

¹⁰⁸ Exhibit ORA-13, p. 27, lines 3-6.

¹⁰⁹ Exhibit SDG&E-14, p. BMB-55, beginning on line 12.

¹¹⁰ R.10-02-005.

1 Commission did not order SDG&E to seek funding as part of its Low Income proceeding.
2 Rather, SDG&E agreed to this as part of the settlement agreement and has done such. In any
3 event, as described in my prepared direct testimony, SDG&E would like to ensure that the CCC
4 is properly staffed to assist customers with CARE enrollments. In SDG&E's response to ORA-
5 SDG&E-DR-051-TLG, Question 19 (see SDG&E response to ORA-SDG&E-DR-051-TLG,
6 Question 19 in Appendix, Attachment A.5) we provided the ORA the following explanation:

7
8 "....because of prior Commission directives in D.05-04-052 disallowing call center costs
9 to be charged to the CARE Program, SDG&E has made a concurrent request in its test
10 year 2016 GRC, in the event the Commission rejects the funding request in the low
11 income proceeding. Should the Commission authorize the incremental funding to enroll
12 customers in CARE through the low income proceeding, SDG&E will make an
13 appropriate adjustment to its request its customer contact center forecast in its TY 2016
14 GRC."

15 As indicated in the above data response and in testimony,¹¹¹ if SDG&E receives a
16 decision in its Low Income proceeding that authorizes funding for this activity, an adjustment
17 will be made to the CCC GRC TY 2016 forecast. For these reasons, ORA's adjustment of
18 \$72,000 should be denied to ensure that the CCC is properly staffed to assist customers with
19 CARE enrollments.

20
21 **ORA suggests SDG&E plan, develop, and implement customer pilot programs in**
22 **the TY 2016 related to enhanced Customer Education and Customer Outreach Safety**
23 **Checks.**

24
25 As presented in my direct testimony,¹¹² I am requesting \$48,000 to respond to customer
26 calls that will result from mailing postcards to customers offering to schedule a field technician
27 to perform a safety check on their gas appliances for those customers who have not had an
28 SDG&E safety check performed in at least the last seven years as described in the testimony of

¹¹¹ Exhibit SDG&E-14, p. BMB-55, lines 18-20.

¹¹² Exhibit SDG&E-14, p. BMB-54, beginning on line 10.

SDG&E witness Sara Franke.¹¹³ ORA states the Commission should “direct SDG&E to plan, develop, and implement customer pilot programs in the TY to track the interest/requests made by customers and the related costs incurred on SDG&E’s proposed new services (offers/options) for customers related to enhanced Customer Education and Customer Outreach Safety Checks.”¹¹⁴

If ORA’s recommendation is adopted, the Commission should provide funding that fully covers the incremental cost of ORA’s proposed pilot programs, including the associated funding required to print information regarding carbon monoxide (“CO”) detectors, mail postcards to customers offering safety checks on their gas appliances, and respond to customer calls, all of which are sponsored in my direct testimony. Without the necessary funding, SDG&E would not be able to offer these new services to customers, even under a pilot program.

2. Customer Service Information

The following Table BMB-14 shows SDG&E’s historical (2009 – 2014) and TY 2016 forecasted expenses for SDG&E’s Non-Shared Customer Service Information area.

TABLE BMB-14
SDG&E’s Non-Shared Customer Service Information
2009 – 2014 and TY 2016 Forecasted Expenses

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast	2009 - 2013 % Change
Residential Customer Services	\$3,457	\$2,842	\$3,448	\$4,105	\$5,576	\$4,336	\$6,607	\$5,576	61.3%
Commercial & Industrial Services	\$5,264	\$5,142	\$5,205	\$5,405	\$5,305	\$4,712	\$5,789	\$5,305	0.8%
Communications, Research and Web	\$6,576	\$4,637	\$5,535	\$7,984	\$7,940	\$6,899	\$14,287	\$8,093	20.7%
Customer Programs and Projects	\$2,296	\$1,795	\$1,784	\$2,425	\$2,721	\$2,185	\$3,443	\$2,854	18.5%
Total	\$17,593	\$14,416	\$15,972	\$19,919	\$21,542	\$18,132	\$30,126	\$21,828	22.4%

¹¹³ Exhibit SDG&E-13, pp. SAF-15 to SAF-16.

¹¹⁴ Exhibit ORA-13, p. 2, beginning on line 33.

1 **ORA improperly introduces 2014 adjusted-recorded expenses.**

2
3 As in the Customer Service Operations workgroups, ORA asserts that Customer Service
4 Information workgroups 2014 adjusted-recorded expenses were lower than the 2014 GRC
5 forecast, and as such, the 2014 GRC forecast was overstated. ORA also asserts that since the
6 2014 GRC forecast was overstated, that the Customer Service Information TY 2016 GRC
7 forecast must be overstated and disallowed. ORA takes a very simplified approach that ignores
8 several key factors. First, ORA ignores year-to-year activity levels that can cause fluctuations in
9 recorded expenses (e.g., timing of Commission decisions, business priorities, labor vacancies,
10 expense timing, etc.). Second, ORA ignores that SDG&E Customer Service has forecasted
11 nearly \$3 million of process improvements and productivity increases that must be achieved by
12 TY 2016 and the impacts to 2014 actual expenses of achieving those reductions. A list of
13 SDG&E's process improvements and productivity increases can be found in Appendix C,
14 Supplemental Tables, Attachment C.1. Third, TY 2016 represents incremental activity to BY
15 2013 not to 2014 so including 2014 actual expenses is a flawed analytical approach in evaluating
16 TY 2016 expense levels. If the Commission were to agree with ORA's approach of using 2014
17 actual data in computing the forecast of TY 2016 incremental activities, SDG&E would need to
18 fully factor the impact of 2014 actual expense and re-compute all its TY 2016 incremental
19 requirements.

20 In addition to all the factors just stated, ORA is selective and only applies this approach
21 to certain workgroups within Customer Service. Other workgroups where the 2014 actual
22 expense is greater or less than the 2014 forecast, ORA deems the TY 2016 forecast as
23 reasonable. Due to its flawed analytical approach and inconsistent application, this ORA
24 argument should be ignored and the SDG&E TY 2016 forecast be adopted.

25
26 **ORA ignores SDG&E's request for ongoing support for the Smart Pricing Program**
27 **for Customer Service Information.**

28
29 In my direct testimony,¹¹⁵ I explain the Smart Pricing Program ("SPP") was established
30 in 2010 to implement new rate options, customer tools, and other provisions adopted by CPUC

¹¹⁵ Exhibit SDG&E-14, p. BMB-23, beginning on line 3.

1 D.12-12-004 in SDG&E's Dynamic Pricing Application¹¹⁶. Ordering Paragraph 16 of D.12-12-
2 004 ordered SDG&E to establish a DPBA to record its costs related to the implementation of the
3 program. As described in my direct testimony, the CPUC directed SDG&E to request funding
4 for post-2015 operational costs as part of a future GRC.¹¹⁷ Therefore, SDG&E's TY 2016 GRC
5 forecast includes the operational costs necessary to support ongoing SPP expenses as shown in
6 Appendix C, Supplemental Tables, Attachment C.2. SPP expenses are now funded through
7 2015 in the DPBA. As stated above, the Commission has explicitly ordered in D.12-12-004 that
8 continued funding for SPP be included in GRC rates. As such, SDG&E should be authorized
9 funding to transition these activities to GRC rates in TY 2016.

10 By disallowing TY 2016 incremental activities for SDG&E's non-shared Customer
11 Service Information, ORA has effectively ignored the CPUC's order. Any disallowance will
12 have a direct impact to SDG&E's customers as described in each workgroup area that I am
13 seeking dollars to support SPP. It should also be noted that for Customer Service Operations,
14 the ORA partially approved (due to a calculation error) SDG&E's request for additional billing
15 positions to support new rate options and programs including SPP. SDG&E discusses ORA's
16 faulty calculation in Section III.A.b above under the heading "Faulty ORA calculation for New
17 Rate Options and Programs."

18 I will address specific ORA testimony directed at Customer Service Information
19 workgroups.

20
21 **a. Residential Customer Services**

22
23 **ORA incorrectly claims that SDG&E's Residential Customer Services increase is**
24 **not justified and its TY 2016 expense is overstated.**

25
26 ORA asserts: "SDG&E's request for an increase of 18.49% over 2013 adjusted-recorded
27 expenses is not justified."¹¹⁸

28

¹¹⁶ A.10-07-009.

¹¹⁷ CPUC D.12-12-004, pp. 16-17 and Ordering Paragraph 15.

¹¹⁸ Exhibit ORA-13, p. 30, lines 6-7.

1 ORA’s analysis and recommendations are flawed on many levels. First, ORA’s
2 calculation of SDG&E’s increase of 18.49% over BY 2013 adjusted-recorded for the Residential
3 Customer Services workgroup is misleading as it does not adjust for the \$1,319,000 of SPP
4 activities that are already included in SDG&E rates as described in Appendix C, Supplemental
5 Tables, Attachment C.2. A 5.16% decrease over BY 2013 adjusted-recorded expenses would be
6 more accurate.

7 Furthermore, ORA’s analysis ignores that TY 2016 represents incremental activities to
8 BY 2013 as shown in my direct testimony.¹¹⁹ For example, Residential Customer Services TY
9 2016 forecast includes incremental activities for the growth in Plug-In Electric Vehicles and to
10 educate customers about the Commission’s actions taken for residential rate reform. ORA does
11 not object to or dispute the need for these incremental activities. However, ORA proposes to
12 disallow the incremental funding needed to support these activities and ignores the analysis
13 supporting these additional activity levels between BY 2013 and TY 2016. In fact, Residential
14 Customer Services has shown a 61.3% growth in adjusted-recorded expenses from 2009 – 2013
15 (see Table BMB-14) due to increased activity levels.

16 ORA further states: “The highest recorded expense level for the six year period (2009-
17 2014) was in 2013 of \$5.576 million.”¹²⁰

18 The implication that the BY 2013 Residential Customer Services adjusted-recorded
19 expense level is sufficient to fund TY 2016 expenses is flawed. As stated in my direct
20 testimony,¹²¹ Residential Customer Services has changed significantly due to the rapidly growing
21 electric vehicle and residential photovoltaic markets. In addition, several changes to electric
22 rates in BY 2013 required an increase in education and outreach resources to address significant
23 increases in customers’ utility bills which will continue with activities such as Net Energy
24 Metering (“NEM”) reform and residential rate reform. ORA also ignores the fact that current
25 activities that need to continue beyond the expiration of the Dynamic Pricing Balance Account
26 (DPBA) need to be funded starting in TY 2016 as discussed below. For these reasons, using the
27 BY 2013 adjusted-recorded expenses provides a reasonable starting point for future

¹¹⁹ Exhibit SDG&E-14, p. BMB-64, beginning on line 15 to BMB-72.

¹²⁰ Exhibit ORA-13, p. 30, lines 13-14.

¹²¹ Exhibit SDG&E-14, p. BMB-64, line 2-13.

1 expenditures. The future incremental expenditures as shown in my direct testimony¹²² should be
2 evaluated on their merits by the Commission and funded appropriately.

3 ORA also states “SDG&E’s adjusted-recorded expenses, after its organizational changes,
4 decreased by \$1.240 million between 2013 and 2014 from \$5.576 million in 2013 to \$4.336
5 million in 2014”¹²³ and “SDG&E’s 2014 adjusted recorded expenses of \$4.336 million are
6 \$0.802 million less than its 2014 forecast of \$5.138 million.”¹²⁴

7 ORA improperly assumes that 2014 adjusted-recorded expenses being less than the 2014
8 GRC forecast is relevant and should be used to call into question the TY 2016 forecast. Because
9 of SDG&E’s commitment of nearly \$3 million of reductions by TY 2016, SDG&E must
10 accelerate reductions in forecast year 2014 in order to achieve the TY 2016 embedded cost
11 reductions as shown in Appendix C, Supplemental Tables, Attachment C.1. SDG&E has
12 committed to efficiency gains by TY 2016 and therefore is attempting to achieve these efficiency
13 gains in 2014 and 2015. SDG&E disagrees with ORA’s assumptions and urges the CPUC to
14 fully fund these incremental activities for Residential Customer Services.

15
16 **ORA assertion that cost for incremental activities are already embedded in BY 2013**
17 **adjusted-recorded expenses is factually incorrect.**

18
19 By not adopting SDG&E’s incremental request above BY 2013 adjusted-recorded
20 expenses, ORA ignores the activities that are transitioning to O&M in TY 2016 that are currently
21 funded through SDG&E’s DPBA and further ignores incremental and new activities that are not
22 included SDG&E’s BY 2013 adjusted-recorded expense level.

23 As described above¹²⁵ and in my direct testimony, the CPUC authorized SDG&E to
24 request funding for post-2015 operational costs as part of a future GRC¹²⁶. Therefore, SDG&E’s
25 Residential Customer Services TY 2016 GRC forecast includes operational costs necessary to
26 support ongoing SPP expenses. SPP expenses are now funded through 2015 in the DPBA. As
27 stated above, the Commission has explicitly ordered in D.12-12-004 that continued funding for

¹²² Exhibit SDG&E-14, p. BMB-64, beginning on line 15 to BMB-72.

¹²³ Exhibit ORA-13, p. 30, lines 11-13.

¹²⁴ Exhibit ORA-13, p. 30, lines 14-16.

¹²⁵ See Section III.A.1 under the heading “ORA ignores almost all of SDG&E’s request for ongoing support for the Smart Pricing Program for Customer Service Operations.”

¹²⁶ CPUC D.12-12-004, pp. 16-17 and Ordering Paragraph 15.

1 SPP be included in GRC rates. As such, SDG&E should be authorized funding to transition
2 these activities to GRC rates in TY 2016. Any disallowance will have a direct impact to
3 SDG&E's customers as it relates to SDG&E's Energy Management Tool ("EMT") which
4 customers use to understand their energy usage and compare rate options, and analysis of both
5 internal business processes as well as customer-focused analytics to ensure SPP solutions are in
6 line to meet business and customer needs.

- 7 • EMT

8 As presented in my direct testimony,¹²⁷ Residential Customer Services TY 2016 forecast
9 includes \$98,000 for a Product Manager who is responsible for managing the third party contract
10 for SDG&E's EMT implemented pursuant to SDG&E's SPP D.12-12-004. The Product
11 Manager manages vendor relations, contract changes, facilitating new product features
12 implemented through monthly and quarterly vendor product releases. The position is also
13 responsible for leading and managing the oversight of production defects and facilitating new
14 system changes which may be necessary to comply with a CPUC mandate, such as default CPP-
15 D for medium business customers and residential rate reform. This position is currently funded
16 through SDG&E's DPBA and will transition to O&M in TY 2016.

17 As presented in my direct testimony,¹²⁸ I am requesting \$582,000 for third party
18 licensing, hosting and maintenance costs for SDG&E's EMT. This is another example of an
19 expense that is currently funded through SDG&E's DPBA. These costs are ongoing beyond
20 SPP's implementation and must transition to O&M in TY 2016.¹²⁹

21 As presented in my direct testimony,¹³⁰ I am also requesting \$75,000 to pay for the
22 increased licensing fees to provide customers with a customized annual cost comparison.
23 SDG&E's SPP developed the Personalized Plan Comparison report and is able to run reports for
24 up to 250,000 meters per month. With the introduction of new SPP rates in 2015 and other
25 future residential rate changes (Rate Reform, SDG&E's Rate Design Window, etc.), SDG&E
26 seeks funding to offer the comparison report to a larger portion of its residential population.
27

¹²⁷ Exhibit SDG&E-14, p. BMB-65, beginning on line 10.

¹²⁸ Exhibit SDG&E-14, p. BMB-66, beginning on line 7.

¹²⁹ Exhibit SDG&E-14-WP-R, p. 134, and Appendix C, Supplemental Tables, Attachment C.2.

¹³⁰ Exhibit SDG&E-14, p. BMB-67, beginning on line 4.

1 • Customer Data Analytics and Technical Studies

2 As presented in my direct testimony,¹³¹ Residential Customer Services TY 2016 forecast
3 includes \$237,000 for a Project Manager, Senior Market Analyst, and a Business System
4 Advisor to support data analytics and technical studies. These positions have conducted
5 extensive analysis of both internal business processes as well as customer-focused analytics to
6 ensure SPP solutions are in line to meet business and customer needs. They developed and will
7 continue to implement systems and processes that will serve as the foundation for SDG&E's
8 customer analysis and internal data segmentation activities. SPP's new customer analytics tools
9 have been incorporated into our business processes to achieve maximum efficiencies in the areas
10 of maintenance of customer segmentation, customer behavior analysis, bill impact research and
11 predictive modeling, and online presentment of SDG&E's rate offerings. The foundational work
12 provided by SPP will be expanded and leveraged to aid in the development and implementation
13 of new rates and services.

14 As presented in my direct testimony,¹³² the TY 2016 forecast also includes \$327,000 for
15 data analytics tools and consulting services. In order for these tools to continue to provide
16 timely and accurate customer data analytics that support technical studies, they have to be
17 updated for structural model changes and the addition of new rates that are required on a regular
18 basis. SDG&E will continually review and refine customer analytics as our business transforms
19 in response to changing customer needs and dynamics. As software becomes more complex and
20 rates require more engagement, analytics tools as well as a continual refinement of our customer
21 segmentation model will become even more relevant and necessary.

22 Based on the following statement, ORA seems to be implying that SDG&E can reuse
23 funds that we have already removed from our TY 2016 forecast to fund Customer Data Analytics
24 and Technical Studies activities.

25 "SDG&E's forecast for its Customer Data Analytics and Technical Studies of \$0.654
26 million (\$1.962 million over three years) includes \$0.327 million of non-labor costs 'to fund
27 various internal tools and consulting services' (Ex. SDG&E-14, p. BMB-68). SDG&E's
28 historical expenses include costs for completed projects and one-time costs (such as Manage Act
29 Save program costs of \$0.938 million (SDG&E response to ORA-SDG&E-072-TLG, Q1-c) for

¹³¹ Exhibit SDG&E-14, p. BMB-67, beginning on line 18.

¹³² Exhibit SDG&E-14, p. BMB-68, beginning on line 3.

1 various consulting services that can be reallocated in the TY “to fund various internal tools and
2 consulting services’ and additional funding over 2013 expense levels is not required for this
3 activity.”¹³³

4 SDG&E disagrees with this random approach and urges the Commission to fund these
5 activities as SDG&E proposed.

6 In summary, these positions and tools are primarily being funded through the DPBA.
7 These positions and tools are necessary to provide customers with tailored and personalized
8 offerings that are aligned with their needs and preferences.

9
10 **ORA implies the funding SDG&E received in its 2012 GRC for Plug-In Electric**
11 **Vehicles (PEVs) is sufficient for TY 2016.**

12
13 ORA states the following:

14
15 “SDG&E’s historical expenses include costs associated with Plug-In Electric Vehicles.
16 SDG&E requested and was authorized funding in its 2012 GRC for customer outreach
17 and education activities related to Plug-In Electric Vehicles (SDG&E response to ORA-
18 SDG&E-051-TLG, Q2).”¹³⁴

19
20 Similar to growth for Net Energy Metering,¹³⁵ ORA ignores the growth in PEVs. As
21 depicted in my direct testimony¹³⁶ and shown in Table BMB-15 below, the purchase of PEVs
22 more than doubled in BY 2013 when compared to 2012 and is forecasted to increase
23 significantly by TY 2016 according to the California Energy Commission.¹³⁷ 2014 actuals for
24 PEVs is 12,736 which is substantially higher than forecasted and leads SDG&E to believe that
25 future years will be higher as well.

26

¹³³ Exhibit ORA-13, p. 29, footnote 76.

¹³⁴ Exhibit ORA-13, p. 29, footnote 77.

¹³⁵ See Section III.A.1.b above under the heading “SDG&E is not seeking the same NEM positions as from the TY 2012 GRC.”

¹³⁶ Exhibit SDG&E-14, p. BMB-71.

¹³⁷ Source for 2011-2013 sales is based on the number of vehicles observed in SDG&E’s service territory (DMV data, rebate programs, dealerships, auto manufacturers, billing, etc.). Source for 2014-2020 sales is the CEC California Energy Demand 2014-2024 Final Forecast, SDG&E Mid-Case forecast: http://www.energy.ca.gov/2013_energypolicy/documents/#reportsnometing.

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**TABLE BMB-15
PEV Customer Growth**

Year	PEVs
2011	963
2012	2,140
2013	5,194
2014	8,317
2015	21,580
2016	39,978
2017	59,828
2018	77,735
2019	99,439
2020	121,996

Furthermore, at the request of ORA in ORA-SDG&E-DR-051-TLG, Question 2 (see SDG&E response ORA-SDG&E-DR-051-TLG, Question 2 in Appendix A, Attachment A.2), SDG&E included a list of activities that were requested in SDG&E’s TY 2012 GRC that are also requested in SDG&E’s TY 2016 GRC. SDG&E’s response included the following explanation for its PEV customer outreach and education requests:

Workgroup	Activity	2012 GRC (2009 \$’s)	TY 2016 GRC (2013 \$’s)	TY 2016 Explanation
Residential Services	Outreach & Education for Plug-In Electric Vehicles	Requested \$1.385M in non-labor (\$1.040M related to PEV outreach activities) and received approval of \$400K in non-labor but did not specify the activities.	Requesting \$100K in non-labor	Growth in Plug-In Electric Vehicles (see details on pages BMB-70 and BMB-71).

ORA has ignored the historic increase and the almost eight-fold increase from BY 2013 to TY 2016. The incremental funding for this activity is clearly required if SDG&E is to continue to educate and inform a growing PEV base of customers on SDG&E rate options and

1 other PEV program services. Furthermore, CPUC D.14-08-032 in PG&E’s TY 2014 GRC
2 grants PG&E’s forecasted growth for PEV sales.¹³⁸ For these reasons, the CPUC should ignore
3 the ORA and grant SDG&E incremental funding in order for SDG&E to perform targeted
4 outreach and education to the growing number of PEV customers consistent with the CPUC’s
5 guidelines established by the CPUC in D.11-07-029.

6
7 **ORA completely ignores cost drivers in support of the CPUC’s residential rate**
8 **reform.**

9
10 As presented in my direct testimony,¹³⁹ I am requesting \$50,000 for the development,
11 production, and distribution of collateral material provided to customers on residential rate
12 reform. Ordering Paragraph 4 of D.14-06-029 in the Residential Rate Reform OIR,¹⁴⁰ the
13 Commission adopts key principles for the utilities to address when evaluating residential rate
14 design changes. One of those key principles includes: “Transitions to new rate structures should
15 emphasize customer education and outreach that enhances customer understanding and
16 acceptance of new rates, and minimizes and appropriately considers the bill impacts associated
17 with such transitions.” Furthermore, customer outreach and education activities are supported by
18 CPUC D.14-08-032 in PG&E’s 2014 GRC. In PG&E’s GRC the CPUC approves PG&E’s
19 forecast of \$18 million for customer rate education and outreach. The CPUC finds that as
20 customers continue to move toward more complex time-varying pricing programs, PG&E needs
21 to proactively provide customers with clear and comprehensive rate education.¹⁴¹ Thus, my
22 request for \$50,000 for the development, production, and distribution of residential rate reform
23 collateral is consistent with Commission authorization of incremental funds for other utilities and
24 should be approved.

25

¹³⁸ D.14-08-032, p. 204.

¹³⁹ Exhibit SDG&E-14, p. BMB-71, beginning on line 12.

¹⁴⁰ R.12-06-013.

¹⁴¹ D.14-08-032, p. 327.

1 **TY 2016 activities cannot be funded by a reallocation of BY 2013 adjusted-recorded**
2 **expenses.**

3
4 ORA states the following:

5
6 “SDG&E’s adjusted-recorded expenses (2009-2013) for its Residential Customer
7 Services Group also include overtime costs, and costs incurred for one-time, nonrecurring
8 and unusual activities (expenses incurred that are not necessary or required to operate the
9 utility business). SDG&E did not consider and/or incorporate these embedded costs into
10 its TY forecast for additional positions and proposed activities.”¹⁴²

11
12 SDG&E disagrees with ORA’s assertion that portions of BY 2013 expenses can be
13 reallocated to fund SDG&E’s TY 2016 incremental request. ORA is admitting that “additional
14 positions and proposed activities” require additional funding, but suggests or asserts that
15 incremental funding can be found in “embedded” costs. ORA provides no facts or analysis as to
16 which SDG&E Residential Customer Services activities in BY 2013 are “one-time, non-
17 recurring and unusual costs.” ORA provided no workpapers that identified such activities and
18 did not estimate the BY 2013 expenses related to ORA’s claim of “one-time, non-recurring and
19 unusual activities.” Since this argument has no factual basis, SDG&E urges the Commission to
20 ignore ORA’s assertions and to fully fund SDG&E’s incremental activities.

21 Accordingly, the Commission should reject ORA’s arguments and adopt SDG&E’s
22 request of TY 2016 Residential Customer Services forecast of \$6,607,000.

23

¹⁴² Exhibit ORA-13, p. 31, lines 1-6.

1 **b. Commercial & Industrial Services**

2
3 **ORA incorrectly claims that SDG&E’s Commercial & Industrial Services increase**
4 **is not justified and its TY 2016 expense is overstated.**

5
6 ORA asserts: “SDG&E’s request for an increase of 9.12% over 2013 adjusted-recorded
7 expenses is not justified when compared to its recent expense levels.”¹⁴³

8
9 ORA’s analysis and recommendations are flawed on many levels. First, ORA’s
10 calculation of SDG&E’s increase of 9.12% over BY 2013 adjusted-recorded for the Commercial
11 & Industrial Services workgroup is misleading as it does not adjust for the \$138,000 of SPP
12 activities that are already included in SDG&E rates as shown in Appendix C, Supplemental
13 Tables, Attachment C.2. A 6.52% increase over BY 2013 adjusted-recorded expenses would be
14 more accurate.

15 Furthermore, ORA’s analysis ignores that TY 2016 represents incremental activities to
16 2013 as shown in my direct testimony.¹⁴⁴ ORA does not object or dispute the need for these
17 incremental activities. However, ORA proposes to disallow the incremental funding needed to
18 support these activities and ignore additional activity levels between BY 2013 and TY 2016.

19 ORA further speculates: “SDG&E’s adjusted-recorded expenses fluctuated slightly
20 during 2009-2014 with an average for the six year period of \$5.172 million and a five year
21 average (2009-2013) of \$5.264 million.”¹⁴⁵

22 The implication that the BY 2013 Commercial & Industrial Services adjusted-recorded
23 expense level is sufficient to fund TY 2016 expenses is flawed. As stated in my direct
24 testimony,¹⁴⁶ Commercial & Industrial Services reorganized to include a Customer Experience &
25 Engagement team and in mid-2013 a SMB team was established. ORA also ignores the fact that
26 current activities that need to continue beyond the expiration of the DPBA need to be funded
27 starting in TY 2016 as discussed below. For these reasons, using the BY 2013 adjusted-recorded
28 expenses provides a reasonable starting point for future expenditures. The future expenditures as

¹⁴³ Exhibit ORA-13, p. 32, lines 10-11.

¹⁴⁴ Exhibit SDG&E-14, p. BMB-78, beginning on line 24 to BMB-81.

¹⁴⁵ Exhibit ORA-13, p. 32, lines 11-14.

¹⁴⁶ Exhibit SDG&E-14, p. BMB-78, line 19-22.

1 shown in my direct testimony¹⁴⁷ should be evaluated on their merits by the Commission and
2 funded appropriately.

3 ORA also states “SDG&E’s expenses decreased by \$0.593 million between 2013 and
4 2014, from \$5.305 million in 2013 to \$4.712 million in 2014.”¹⁴⁸ and “SDG&E’s 2014 recorded
5 expenses of \$4.712 million is \$0.820 million less than its 2014 forecast of \$5.532 million”¹⁴⁹

6 First, ORA misrepresents SDG&E’s 2014 forecast for Commercial & Industrial Services.
7 The 2014 forecast is actually \$5.482 million which is \$770,000 less than the 2014 forecast as
8 shown in my revised workpapers.¹⁵⁰

9 ORA also improperly assumes that 2014 adjusted-recorded expenses being less than the
10 2014 GRC forecast is relevant and should be used to call into question the TY 2016 forecast.
11 Because of SDG&E’s commitment to nearly \$3 million in reductions by TY 2016, SDG&E must
12 accelerate reductions in forecast year 2014 in order to achieve the TY 2016 embedded cost
13 reductions as shown in Appendix C, Supplemental Tables, Attachment C.1. For example, the
14 forecast for the Commercial & Industrial Services workgroup includes process improvements in
15 the Planned Outage area. SDG&E has committed to efficiency gains by TY 2016 and therefore
16 is attempting to achieve these efficiency gains in 2014 and 2015. SDG&E disagrees with ORA’s
17 assumptions and urges the CPUC to fully fund these incremental activities for Commercial &
18 Industrial Services.

19
20 **ORA falsely assumes that the SMB team can be funded by the replacement of the**
21 **Business Contact Center.**

22
23 ORA implies that the SMB team replaced the need for the Business Contact Center
24 (“BCC”) as indicated below:

25
26 “Ex. SDG&E-14, p. BMB-78. SDG&E states “Prior to the creation of the SMB team,
27 customers in this category were served only through the business CCC and did not have
28 individualized service.” (Ex. SDG&E-14, p. BMB-79) SDG&E can reallocate embedded

¹⁴⁷ Exhibit SDG&E-14, p. BMB-78, beginning on line 24 to BMB-81.

¹⁴⁸ Exhibit ORA-13, p. 32, lines 15-16.

¹⁴⁹ Exhibit ORA-13, p. 32, lines 16-17.

¹⁵⁰ Exhibit SDG&E-14-WP-R, pp. 136-137 and p. 210.

1 funding that was utilized by its CCC to provide service to its small and medium business
2 customers before its reorganization to its newly created Small and Medium Business
3 team that will provide service to these customers going forward.”¹⁵¹
4

5 The SMB team did not replace the BCC but was an expansion of service to the
6 underserved small and medium class of business customers. The two organizations perform very
7 unique but complementary functions. The BCC is staffed to provide initial support for our non-
8 assigned business customers for emergency requests such as outage or gas leaks, routine
9 transactions, rate offerings, bill analysis, requests to start or stop service, credit arrangements,
10 and other general inquires. Customers can be referred to the Commercial & Industrial Services
11 SMB team for additional services above and beyond those offered by the BCC. The SMB team
12 is a proactive outreach team leveraging customer research as its starting point to effectively
13 communicate with the small and medium business customers about the availability of programs
14 and services, rate education, and any mandated communications. The SMB team provides
15 information that will directly impact their business, to keep them apprised of all regulatory and
16 rate changes, tips on how to save money on their energy bill, and safety-related messages.
17

18 **ORA ignores the incremental funding request for the SMB team.**
19

20 As presented in my direct testimony,¹⁵² I am requesting \$310,000 above the BY 2013
21 adjusted-recorded expenses for a Business System Analyst, a Customer Energy Specialist, an
22 Account Executive, and a Project Specialist to support small and medium business customers
23 with new rate options and programs. Two of these positions were previously funded through
24 SDG&E’s DPBA and will transition to O&M beginning in TY 2016. See Section III.A.1 under
25 the heading “ORA ignores almost all of SDG&E’s request for ongoing support for the Smart
26 Pricing Program for Customer Service Operations” above for a more detailed discussion
27 regarding the DPBA. This is another example where TY 2016 funding is not necessarily
28 incremental to total SDG&E revenue requirements since these two positions are currently funded
29 under DPBA. D.12-12-004 has directed SDG&E seek ongoing DPBA activities in this GRC

¹⁵¹ Exhibit ORA-13, p. 33, footnote 88.

¹⁵² Exhibit SDG&E-14, p. BMB-79, beginning on line 3.

1 cycle as the DPBA is being phased out. Any disallowance will directly impact SDG&E's
2 customers including providing individualized services to small and medium business customers.

3 The SMB team was created in BY 2013 to individually serve SDG&E's customers with
4 demand between 20kW to 500kW. Prior to the creation of the SMB team, customers in this
5 category were only served by the BCC. The additional positions being requested will increase
6 individualized contact service for small and medium customers. The complexities of SDG&E's
7 programs and pricing options require a new, concerted effort by SDG&E to assist customers and
8 their location. The additional employees will provide personalized product offers to these
9 customers including new service setups, project planning and coordination, account
10 management, energy efficiency program support, rate analysis, and help with SDG&E's online
11 tools.

12 The SMB team has shown itself to be a valued resource to our small and medium
13 business customers and SDG&E urges the Commission to authorize its funding request.

14
15 **ORA incorrectly assumes the Project Manager position can be absorbed with BY**
16 **2013 funds.**

17
18 ORA denies the funding request because:

19
20 "SDG&E's 2014 adjusted-recorded expenses include costs for the Project Manager
21 position it proposes in the TY. SDG&E's 2014 adjusted-recorded expenses of \$4.712
22 million is \$0.593 million less than its 2013 adjusted-recorded expenses of \$5.305 million,
23 so additional funding for this position over 2013 expense levels is not necessary. SDG&E
24 hired a Project Manager in early 2014 to manage and coordinate activities associated with
25 outage management and communication processes (Ex. SDG&E-14, p. BMB-81)."¹⁵³

26
27 ORA does not object or dispute to the incremental activities performed by the Project
28 Manager. These activities include offering customers more outage communication channels
29 such as email and text messaging, enhancing the outage map on SDG&E's website to allow
30 customers to see planned outages a day ahead and track the planned outages in their area,

¹⁵³ Exhibit ORA-13, p. 32, footnote 85.

1 providing customers with better estimated times of restoration and minimizing outage
2 rescheduling or cancellations. All of these improvements align with the 2012 J.D. Power and
3 Associates Utility Outage Communications Preferences Report (see Appendix D).

4 This is a prime example of why ORA's use of 2014 adjusted-recorded expenses as a
5 basis for disallowing incremental funding requests included in SDG&E's TY 2016 forecast is
6 flawed. ORA does not object to or dispute this incremental activity, but uses data that was not a
7 basis for the request as a reason to deny the funding request. The Commission should ignore this
8 faulty ORA reasoning and approve SDG&E's funding request for this position.

9
10 **ORA approves capital project but not associated licensing fees.**

11
12 As presented in my direct testimony,¹⁵⁴ I am requesting \$75,000 for annual software
13 hosting fees related to the Critical Peak Pricing – Default (CPP-D) capital project (project
14 #13021). This capital project will implement CPP-D for medium business customers in
15 compliance with CPUC D.08-02-034 in SDG&E's Rate Design Window application (A.07-01-
16 047). ORA did not contest this project therefore the expense for the ongoing annual software
17 licensing costs should be approved.

18 For all the reasons described above, ORA's use of the BY 2013 adjusted-recorded
19 expenses for Commercial & Industrial Services TY 2016 forecast should be rejected and the
20 CPUC should adopt funding for the incremental activities.

21
22 **TY 2016 activities cannot be funded by a reallocation of BY 2013 adjusted-recorded**
23 **expenses.**

24
25 ORA states the following:

26
27 "SDG&E's historical expenses (2009-2013) include costs incurred for onetime, non-
28 recurring and unusual expenses (expenses incurred that are not necessary or required to
29 operate the utility business), which are incorporated into ORA's TY 2016 estimate and
30 which provides embedded funding that SDG&E can reallocate in the TY for proposed

¹⁵⁴ Exhibit SDG&E-14, p. BMB-81, beginning on line 25.

1 activities. ORA recommends that the Commission adopt \$5.305 million as a reasonable
2 TY estimate for SDG&E's Commercial and Industrial Services work group."¹⁵⁵

3
4 SDG&E disagrees with ORA's assertion that portions of BY 2013 expenses can be
5 reallocated to fund SDG&E's TY 2016 incremental request. ORA is admitting that additional
6 positions and proposed activities require additional funding, but suggests or asserts that
7 incremental funding can be found in "embedded" costs. ORA provides no facts or analysis as to
8 which SDG&E Commercial & Industrial Services activities in BY 2013 are "one-time, non-
9 recurring and unusual costs." ORA provided no workpapers that identified such activities and
10 did not estimate the BY 2013 expenses related to ORA's claim of "one-time, non-recurring and
11 unusual activities."

12 Therefore, the Commission should reject ORA's arguments and adopt SDG&E's request
13 of TY 2016 Commercial & Industrial Services forecast of \$5,789,000.

14
15 **c. Communications, Research & Web**

16
17 **ORA's TY 2016 Forecast Methodology for Communications, Research & Web is**
18 **flawed and fails to incorporate activity growth.**

19
20 ORA states the following:

21
22 "ORA utilized a two year average (2012 and 2013) as a basis to calculate its estimate of
23 \$8.093 million (Labor of \$2.343 million and Non-Labor of \$5.750 million) for SDG&E's
24 Communications, Research & Web expenses. ORA's estimate is \$6.194 million less than
25 SDG&E's forecast."¹⁵⁶

26
27 SDG&E disagrees with ORA's inconsistent approach and faulty analysis in determining
28 SDG&E's Communications, Research & Web's TY 2016 forecast. First, ORA's use of a two-
29 year average is inconsistent with their other approaches of using BY 2013 adjusted-recorded

¹⁵⁵ Exhibit ORA-13, p. 33, lines 4-10.

¹⁵⁶ Exhibit ORA-13, p. 33, lines 17-20.

1 expenses. Second, while ORA acknowledges the reasons SDG&E used a BY 2013 adjusted-
2 recorded expenses plus future activities forecast methodology, they dismissed them and deemed
3 their approach as reasonable without any clear explanation. As stated in my direct testimony,¹⁵⁷
4 I chose a BY 2013 forecast method because there were new, major communications topics
5 related to rates and energy pricing that had not been included at that scale in previous years, and
6 these efforts will continue in the future as rate reform progresses. Also, there were new
7 technologies introduced, such as texting, a new development platform for the mobile application,
8 and a focus on a need for mobile friendly communications which will also continue to shape
9 future communications. Therefore, the BY 2013 provides a reasonable starting point for future
10 expenditures.

11 ORA asserts: “SDG&E’s request for an increase of 79.94% over 2013 adjusted-recorded
12 expenses is excessive and not justified.”¹⁵⁸

13 ORA’s analysis and recommendations are flawed on many levels. ORA’s analysis
14 ignores that TY 2016 represents incremental activities to BY 2013 as shown in my direct
15 testimony.¹⁵⁹ First, ORA’s calculation of SDG&E’s increase of 79.94% over BY 2013 adjusted-
16 recorded for the Communications, Research & Web workgroup is misleading as it does not
17 adjust for the \$631,000 of SPP activities that are already included in SDG&E rates as shown in
18 Appendix C, Supplemental Tables, Attachment C.2. A 71.99 % increase over BY 2013
19 adjusted-recorded expenses would be more accurate. Furthermore, Communications, Research
20 & Web has incremental activities related to educating customers about new rate options and
21 programs and customer research activities. ORA does not object to or dispute the need for these
22 incremental activities, although they disallow the incremental funding to support these activities
23 and ignore the analysis supporting these additional activity levels between BY 2013 and TY
24 2016. In fact, Communications, Research & Web has shown a 20.7% growth in adjusted-
25 recorded expenses from 2009 – 2013 (see Table BMB-14).

26 ORA further speculates: “The five year average (2009-2013) is \$6.632 million and the six
27 year average (2009-2014) is \$6.676 million.”¹⁶⁰ and “The highest recorded expense level for the
28 six year period (2009-2014) was in 2012 of \$8.245 million.”¹⁶¹

¹⁵⁷ Exhibit SDG&E-14, p. BMB-85, beginning on line 23 to BMB-86.

¹⁵⁸ Exhibit ORA-13, p. 34, lines 13-14.

¹⁵⁹ Exhibit SDG&E-14, p. BMB-86, beginning on line 8 to BMB-102.

¹⁶⁰ Exhibit ORA-13, p. 34, lines 16-17.

1 ORA misrepresents the five-year average for Communications, Research & Web. The
2 five-year average is actually \$6.534 million based on my revised workpapers.¹⁶² Therefore,
3 ORA's effort to call out the highest recorded expense level for the six year period is also wrong;
4 the highest recorded expenses were \$7.984 million in 2012 not \$8.245 million.

5 ORA also uses this information to imply that since ORA's proposed two-year average for
6 SDG&E's Communications, Research & Web is greater than these other forecast methods and
7 ORA used an average of the two highest expense years (2012 and 2013), ORA's forecast is
8 sufficient to fund TY 2016 expenses. However, ORA ignores the fact that current SPP-related
9 activities need to continue beyond the expiration of the DPBA need to be funded starting in TY
10 2016 as discussed below. Any disallowance will have a direct impact to customers as specific
11 communications are critical to the success of the program. We must support ongoing research,
12 send event notifications and send customers information about their goals. For these reasons,
13 using the BY 2013 adjusted-recorded expenses provides a reasonable starting point for future
14 expenditures. The future expenditures as shown in my direct testimony¹⁶³ should be evaluated
15 on their merits by the Commission and funded appropriately.

16 ORA also states "Although SDG&E's recent activities in this work group changed from
17 previous years and increased... between 2011-2014, SDG&E's adjusted recorded expenses
18 decreased by \$1.346 million between 2012 and 2014 from \$8.245 million in 2012 to \$6.899
19 million in 2014"¹⁶⁴ and "SDG&E's 2014 adjusted-recorded expenses of \$6.899 million is \$3.721
20 million less than its 2014 forecast of \$10.620 million."¹⁶⁵

21 Again, ORA misrepresents SDG&E's expenses. Based on my revised workpapers, the
22 adjusted-recorded expenses for Communications, Research & Web decreased by \$1.085 million
23 in 2014 from 2011 not \$1.346 million, and SDG&E's 2014 adjusted-recorded expenses
24 decreased from 2012 by \$7.984 million not \$8.245 million.¹⁶⁶

25 ORA also improperly assumes that 2014 adjusted-recorded expenses being less than the
26 2014 GRC forecast is relevant and should be used to call into question the TY 2016 forecast.
27 Because of SDG&E's commitment of nearly \$3 million of reductions by TY 2016, SDG&E must

¹⁶¹ Exhibit ORA-13, p. 35, lines 7-8.

¹⁶² Exhibit SDG&E-14-WP-R, pp. 142, 210, and 425-429.

¹⁶³ Exhibit SDG&E-14, p. BMB-86, beginning on line 8 to BMB-102.

¹⁶⁴ Exhibit ORA-13, p. 35, lines 1-7.

¹⁶⁵ Exhibit ORA-13, p. 35, lines 8-10.

¹⁶⁶ Exhibit SDG&E-14-WP-R, p. 142.

1 accelerate reductions in forecast year 2014 in order to achieve the TY 2016 embedded cost
2 reductions as shown in Appendix C, Supplemental Tables, Attachment C.1. SDG&E has
3 committed to efficiency gains by TY 2016 and therefore is attempting to achieve these efficiency
4 gains in 2014 and 2015. SDG&E disagrees with ORA's assumptions and urges the CPUC to
5 fully fund these incremental activities for Communications, Research & Web.

6 ORA implies that by giving SDG&E an average of the two highest recorded expense
7 years (2012 – 2013) from the six year period (2009-2014), ORA's TY 2016 forecast is
8 reasonable and has sufficient embedded expenses to satisfy SDG&E's TY 2016 activity level.

9 ORA states "SDG&E's proposed TY activities for its Communications, Research, &
10 Web workgroup are routine, continuous and/or ongoing in nature and have costs for similar
11 projects embedded in historical expenses; additional funding for these same activities as
12 proposed in SDG&E's forecast is not necessary."¹⁶⁷

13 SDG&E disagrees with ORA's assertion that there are embedded expenses in BY 2013
14 that can be reallocated to fund SDG&E's TY 2016 incremental request. ORA is admitting that
15 additional positions and proposed activities require additional funding, but suggests or claims
16 that incremental funding can be found in "embedded" BY 2013 costs. ORA's assumed
17 reallocation of BY 2013 expenses to new or incremental activities can only be feasible if current
18 ongoing activities can be eliminated or reduced. ORA has not identified any specific activities in
19 BY 2013 that can be eliminated or reduced. ORA has effectively rejected funding for SDG&E's
20 proposed new activities listed below:

- 21 • Customer Research Activities

22 As presented in my direct testimony,¹⁶⁸ I am requesting \$379,000 for four Research
23 Analysts to conduct customer surveys and measure results to understand drivers for customer
24 decision and make changes to better serve our customers. I am also requesting \$1,842,000 for
25 the studies themselves which include costs to expand the existing Customer Connections Survey,
26 implement a new Segmentation Survey, refresh the existing Voice of the Customer Survey, and
27 refresh the existing Competitive Survey.

28 The expansion of the Customer Connections Survey would enable us to monitor
29 Customer Programs transactions, Customer Assistance transactions offerings, and new service

¹⁶⁷ Exhibit ORA-13, p. 35, lines 11-14.

¹⁶⁸ Exhibit SDG&E-14, BMB-87, beginning on line 8.

1 experiences on an ongoing and regular basis to better understand our customers' experiences
2 with these services so that we can better meet their needs. Our most recent Voice of the
3 Customer Survey results are outdated and so are greatly in need of refreshing to better
4 understand how the services customers value has changed over time and identify critical gaps
5 between attributes that customers expect and SDG&E's current performance on those attributes.
6 The new Segmentation Survey is also important, as it would allow us to refresh the outdated
7 segmentation of our customers and better equip us with information to optimize our outreach and
8 education activities by better targeting customers with solutions and message that are most
9 meaningful, useful and fitting to distinct segments of customers. The new Competitive Survey
10 Assessment is key to better understanding drivers for customer decisions toward alternatives, and
11 opinions toward alternative solutions. Among the many techniques used to understand
12 customers in order to best meet their needs and improve services, few remain as instrumental as
13 customer surveys. We trust that the CPUC shares our interest in continuous improvement by
14 utilizing customer insights in shaping services and offerings to our customers.

- 15 • Social Media Tools

16 As presented in my direct testimony,¹⁶⁹ I am requesting \$90,000 to build out SDG&E's
17 social media tools. SDG&E has increased its use of social media to communicate with its
18 customers with Twitter being the primary channel. Using social media provides the opportunity
19 to communicate with our customers during crisis situations by delivering timely and important
20 messages that address safety related messages when other communications channels are
21 unavailable. As an example, during the September 8, 2011 system wide energy blackout in San
22 Diego, SDG&E used Twitter to keep its customers informed of the situation. By building out
23 our social media tools we will be able to meet our customers' expectations by providing them the
24 type of information they would like to receive through these channels, such as information about
25 outages, high bills, and service orders.

- 26 • Social Media Advisor

27 As presented in my direct testimony,¹⁷⁰ I am requesting \$85,000 for a Social Media
28 Advisor to assist SDG&E in using social media channels. More and more customers are using
29 social media to interact with SDG&E. SDG&E does not currently have the resources necessary

¹⁶⁹ Exhibit SDG&E-14, p. BMB-91, beginning on line 1.

¹⁷⁰ Exhibit SDG&E-14, p. BMB-92, beginning on line 27.

1 to measure and report on the effectiveness of its social media campaigns and make
2 improvements where necessary. Finally, by having this additional resource, SDG&E will be able
3 to provide better customer service by addressing personalized customer issues.

- 4 • Mobile Application Capabilities

5 As presented in my direct testimony,¹⁷¹ I am requesting \$50,000 to maintain and enhance
6 SDG&E's mobile application (app). SDG&E has seen a steady increase in mobile app adoption
7 and expects the smartphone population will continue to grow. These funds will allow SDG&E to
8 offer more capabilities to connect with its customers through the device of their choice and to
9 provide them with more useful information.

- 10 • My Account Content Management System

11 As presented in my direct testimony,¹⁷² I am requesting \$100,000 for one full-time
12 employee to provide ongoing management of the content contained within SDG&E's My
13 Account website. Customer use of SDG&E's website has steadily increased over the years
14 (Over 726,000 customer accounts enrolled as of December 2013 compared to approximately
15 434,000 at year-end 2009). SDG&E has hundreds of pages of information on its My Account
16 website with information that needs to be reviewed, updated, and monitored. It's also important
17 to get information posted as quickly as possible. This position will improve the customer
18 experience through better My Account content management.

19 For the reasons describe above, these are reasonable incremental activities that should be
20 approved by the CPUC.

21
22 **ORA ignores ongoing support for the Smart Pricing Program.**

23
24 As described above,¹⁷³ Customer Operations and Information TY 2016 forecast includes
25 operational costs necessary to support ongoing SPP activities. By not adopting SDG&E's
26 incremental request above BY 2013 adjusted-recorded expenses, ORA continues to ignore
27 positions and activities that are currently being funded through SDG&E's DPBA. Furthermore,

¹⁷¹ Exhibit SDG&E-14, p. BMB-94, beginning on line 11.

¹⁷² Exhibit SDG&E-14, p. BMB-95, beginning on line. 4

¹⁷³ See Section III.A.2 under the heading "ORA ignores almost all of SDG&E's request for ongoing support for the Smart Pricing Program for Customer Service Operations."

1 the Commission has explicitly ordered that continued funding for SPP be included in GRC rates.
2 As such, SDG&E should be authorized funding for the following ongoing SPP-related activities.

- 3 • SPP Event Notifications and Goals and Alerts

4 As presented in my direct testimony,¹⁷⁴ I am requesting \$376,000 to distribute to
5 customers event notifications for SDG&E's new SPP rates as well as customer set usage and cost
6 alerts via email and text. These communications will inform customers when they are crossing a
7 tier, meeting a certain threshold on their bill, reaching a certain consumption level, and will
8 summarize their energy usage for them. While the cost of building and promoting these energy
9 use alerts has been funded through SDG&E's DPBA, there are ongoing transactional costs of
10 sending out these alerts which must continue beyond 2015.

- 11 • Ongoing SPP Activities for Communications and Web and Research Support

12 As presented in my direct testimony,¹⁷⁵ I am requesting \$255,000 for a Senior
13 Communications Advisor, Senior Research Analyst, and Web Technologist which are currently
14 funded through SDG&E's DPBA and will transition to O&M in TY 2016. These employees will
15 support the ongoing work required to understand customer needs, improve the customer
16 experience, and assist with the adoption process of rate sign up and retention for customers
17 participating in SDG&E's SPP rates as well as other new rate options, such as residential rate
18 reform. These positions are critical to customers' transition to new rates.

19
20 **ORA suggests SDG&E plan, develop, and implement customer pilot programs in**
21 **the TY 2016 related to enhanced Customer Education and Customer Outreach Safety**
22 **Checks.**

23
24 As presented in my direct testimony,¹⁷⁶ I am requesting \$19,000 to prepare carbon
25 monoxide ("CO") detector collateral for customers and to inform customers about sdge.com. I
26 am also requesting \$281,000 to prepare and mail postcards to customers containing information

¹⁷⁴ Exhibit SDG&E-14, BMB-96, beginning on line 8.

¹⁷⁵ Exhibit SDG&E-14, p. BMB-98, beginning on line 1.

¹⁷⁶ Exhibit SDG&E-14, p. BMB-101, beginning on line 24.

1 about safety checks on gas appliances.¹⁷⁷ The costs are being requested to support these
2 programs as described in the testimony of SDG&E witness Sara Franke.¹⁷⁸

3 ORA states the Commission should “direct SDG&E to plan, develop, and implement
4 customer pilot programs in the TY to track the interest/requests made by customers and the
5 related costs incurred on SDG&E’s proposed new services (offers/options) for customers related
6 to enhanced Customer Education and Customer Outreach Safety Checks.”¹⁷⁹

7 If ORA’s recommendation is adopted, the Commission should provide funding that fully
8 covers the incremental cost of ORA’s proposed pilot programs, including the associated funding
9 required to print information regarding CO detectors, mail postcards to customers offering safety
10 checks on their gas appliances, and respond to customer calls, all of which are sponsored in my
11 direct testimony. Without the necessary funding, SDG&E would not be able to offer these new
12 services to customers, even under a pilot program.

13
14 **ORA’s assertion that there are embedded costs sufficient to educate customers**
15 **about rate changes in SDG&E’s BY 2013 adjusted-recorded expenses is misleading.**

16
17 “SDG&E’s proposed TY activities for its Communications, Research, and Web work
18 group are routine, continuous and/or ongoing in nature and have costs for similar projects
19 embedded in historical expenses; additional funding for these same activities as proposed
20 in SDG&E’s forecast is not necessary. For example, SDG&E’s forecast includes
21 incremental funding of \$2.870 million (\$8.610 million over three years) over 2013
22 adjusted-recorded expenses “to educate customers about new rate options” associated
23 with rate reform. SDG&E’s proposal includes additional funding for mass media
24 advertisement (production and placing of 19 advertisements in media): television, radio,
25 newspaper, online media, and direct mailing of letters. Table 13-18 below from ORA’s
26 testimony in Ex. ORA-13 shows historical costs provided by SDG&E showing costs
27 incurred for mass media communication and marketing activities.

¹⁷⁷ Exhibit SDG&E-14, p. BMB-101, beginning on line 30.

¹⁷⁸ Exhibit SDG&E-13, pp. SAF-15 to SAF-16.

¹⁷⁹ Exhibit ORA-13, p.2, beginning on line 33.

Table 13-18
Mass Media Communication
and Marketing Expenses for 2009-2013
(in Thousands of 2013 Dollars)

Description	2009	2010	2011	2012	2013
Advertising/Marketing Publ	\$ 215,310	\$ 120,307	\$ 124,984	\$ 215,275	\$ 179,418
Advertising & Marketing	1,038,805	509,468	1,277,921	1,622,258	1,582,830
Market Research	902,639	647,926	935,148	847,625	1,099,550
Newspaper Advertising	266,035	626,211	267,143	665,600	515,772
Television Advertising	0	56,433	296,542	1,043,209	673,464
Radio Advertising	279,854	191,517	176,958	529,140	302,900
Online Services Misc.	181,238	295,574	85,275	245,250	611,644
Total	\$2,883,881	\$2,447,436	\$3,163,971	\$5,168,357	\$4,965,578

Source: SDG&E response to ORA-SDG&E-035-TLG.

1
2 Educating customers about various rate changes is not a brand new activity requiring
3 additional funding of \$2.870 million over SDG&E's BY 2013 recorded expenses of
4 \$4.966 million (i.e., \$7.836 over three years = \$23.508 million). As demonstrated in
5 Table 13-18 above, SDG&E's recorded expenses were the highest in 2012, due in part to
6 increased activity to inform customers about several rate increases taking place in 2013-
7 2014. ORA requested additional information on SDG&E's forecast."¹⁸⁰

8
9 ORA's assertion is very misleading and ignores information provided to ORA in
10 response to questions concerning embedded costs. ORA gives the impression that all the
11 expenses in ORA's Table 13-18¹⁸¹ are for rate related education and that all those expenses can
12 be reallocated and are sufficient to fund SDG&E's TY 2016 request to educate customers about
13 new rate options and programs.

14 While ORA's Table 13-18 shows historical expenses for mass media communication and
15 marketing for 2009-2013, ORA makes an unfounded assumption concerning the purpose of

¹⁸⁰ Exhibit ORA-13, pp. 35-36, beginning on line 11.

¹⁸¹ While putting together data for Table BMB-5, using the attachment provided in response to ORA-SDG&E-DR-051 Q9, SDG&E discovered an \$80,500 cost element charging error in BY 2013 adjusted-recorded for Customer Communications & Research Workgroup 100010.000. This expense amount was for BY 2013 Winter Prep Online Advertising, and was charged in error to Cost Element (C/E) Category: 01 Employee Luncheons, Cost Element 6220060 SRV-CATERING. This expense amount should have been charged to C/E Category: 09-Communication/Adv Svcs, Cost Element: 6220050 SRV-ADVRTSNG&MKTG. By making this correction would change ORA Table 13-18 by increasing the total for Advertising & Marketing in BY 2013 from 1,582,830 to 1,663,330, resulting in a change in the total from \$4,965,578 to \$5,046,078.

1 those communications. ORA's Table 13-18 included expenses for many types of
2 communications. For example, in BY 2013 the expenses included the following:

- 3 • Price Challenged Customers in Tiers Three and Four
- 4 • Emergency Preparation - Fire Safety
- 5 • Summer and Winter Preparation
- 6 • Multicultural \$250,000
- 7 • My Account \$100,000
- 8 • Energy Notes - Bill Newsletter

9
10 ORA asked if there were embedded expenses for educating customers about rate changes
11 and options in ORA-SDG&E-DR-051-TLG, Question 21d-e (see SDG&E response to ORA-
12 SDG&E-DR-051-TLG, Question 21d-e in Appendix A, Attachment A.6), which states:

13 "Provide documentation that explains in detail if SDG&E's historical expenses include
14 costs associated with completed projects related to educating customers about rate
15 changes and options."

16
17 SDG&E responded as follows:

18 "No, SDG&E's historical expenses do not include costs associated with completed
19 projects concerning rate changes and options. In fact, SDG&E is proposing expanding its
20 current recurring education to customers on rate changes and options as discussed in
21 detail in the response to Question 21.e."

22
23 Question 21e states:

24 "Provide documentation that explains in detail why SDG&E cannot reallocate embedded
25 funds from completed projects in the TY 'to educate customers about new rate options.'"

26
27 SDG&E responded to Question 21e as follows:

28 "The 2013 costs allocated to communications to continue customer education about new
29 rate options and rate structure changes are outlined in answer to 21 (b) above. The 2013
30 efforts were focused on customers in tiers three and four (approximately 30% or 400,000
31 of our residential customers), plus CARE, FERA and medical baseline customers. In

1 2016, 2017, and 2018 there is a need to communicate with all customers about changes to
2 the electric rate structure, significantly increasing the number of customers we must reach
3 by slightly over three times (30% to 100% or 400,000 to 1,200,000 customers).

4 Therefore, overall costs will increase by a similar amount requiring SDG&E to use the
5 \$1.5 million that is embedded in its 2013 base year in addition to the \$2.87 million in
6 incremental funding in TY 2016 for an annual total of \$4.37 million.”

7
8 SDG&E was very clear on its plans to use the \$1.5 million embedded in its BY 2013
9 adjusted-recorded expenses (which was sufficient to communicate to only 30% of its residential
10 customer base) and was only requesting incremental expenses of \$2.87 million to communicate
11 to the remaining 70% of its residential customer base. ORA conveniently left all of this
12 information out of its testimony when it made the assertion that SDG&E had sufficient
13 embedded expenses and that its forecast was unreliable and should be ignored.

14 In addition to making unfounded statements about embedded expenses, ORA gives the
15 impression that the level of rate education being requested by SDG&E in TY 2016 is “routine” in
16 nature and that SDG&E only provided “spreadsheets with brief narratives and lump sum figures
17 as additional support”¹⁸² for these activities. This is yet another example of where ORA ignores
18 the discussion in my direct testimony¹⁸³ and the CPUC’s guidance on a particular incremental
19 activity SDG&E has requested funding for. In the Residential Rate Reform OIR¹⁸⁴, the
20 Commission adopts key principles for the utilities to address when evaluating residential rate
21 design changes. One of those key principles includes: “Transitions to new rate structures should
22 emphasize customer education and outreach that enhances customer understanding and
23 acceptance of new rates, and minimizes and appropriately considers the bill impacts associated
24 with such transitions.”¹⁸⁵ Furthermore, customer outreach and education activities are supported
25 by CPUC D.14-08-032 in PG&E’s 2014 GRC. In PG&E’s GRC the CPUC approves PG&E’s
26 forecast of \$18 million for customer rate education and outreach. The CPUC finds that as
27 customers continue to move toward more complex time-varying pricing programs, PG&E needs

¹⁸² Exhibit ORA-13, p. 34, lines 14-15.

¹⁸³ Exhibit SDG&E-14, BMB-86, beginning on line 7

¹⁸⁴ R.12-06-013.

¹⁸⁵ D.14-06-029, O.P. 4

1 to proactively provide customers with clear and comprehensive rate education.¹⁸⁶ The level of
2 education needed by customers in TY 2016 is anything but “routine” and consequently, my
3 request for \$2,870,000 to educate customers about new rate options and programs as outlined in
4 my direct testimony should be adopted by the CPUC.

5 Therefore, for all the reasons stated above, the Commission should reject ORA’s proposal
6 and adopt SDG&E’s Communications, Research & Web TY 2016 forecast of \$14,287,000.

7
8 **d. Customer Programs & Projects**

9
10 **ORA incorrectly claims that SDG&E’s Customer Programs & Projects**
11 **increase is not justified and its TY 2016 expense is overstated.**

12
13 ORA asserts: “SDG&E’s request for an increase of 26.53% over 2013 adjusted-recorded
14 expenses is not justified.”¹⁸⁷

15
16 ORA’s analysis and recommendations are flawed on many levels. First, ORA’s
17 calculation of SDG&E’s increase of 26.53% over BY 2013 adjusted-recorded for the Customer
18 Programs & Projects workgroup is misleading as it does not adjust for the \$141,000 of SPP
19 activities that are already included in SDG&E rates as shown in Appendix C, Supplemental
20 Tables, Attachment C.2. A 21.35% increase over BY 2013 adjusted-recorded expenses would be
21 more accurate.

22 Furthermore, ORA’s analysis ignores that TY 2016 represents incremental activities to
23 2013 as shown in my direct testimony.¹⁸⁸ For example, Customer Program & Projects has
24 incremental activities to support medium customers on the Default Critical Peak Pricing (CPP-D)
25 adopted by the Commission¹⁸⁹ and activities necessary to support the Commission’s goals
26 regarding customer privacy. ORA does not object or dispute the need for these incremental
27 activities. However ORA, with the exception of the Privacy Audit, proposes to disallow the
28 funding needed to support these activities and ignores additional activity levels between BY

¹⁸⁶ D.14-08-032, p. 327.

¹⁸⁷ Exhibit ORA-13, p. 39, lines 10-11.

¹⁸⁸ Exhibit SDG&E-14, p. BMB-106, beginning on line 20 to BMB-111.

¹⁸⁹ CPUC D.08-02-034.

1 2013 and TY 2016. In fact, Customer Programs & Projects has shown an 18.5% growth in
2 adjusted-recorded expenses from 2009 – 2013 (see Table BMB-14) due to increased activity
3 levels.

4 ORA further speculates: “SDG&E’s adjusted-recorded expenses fluctuated during 2009-
5 2014 with an average for the six year period of \$2.201 million.”¹⁹⁰

6 The implication that the 2013 Customer Programs & Projects adjusted-recorded expense
7 level is sufficient to fund TY 2016 expenses is flawed. As stated in my direct testimony,¹⁹¹
8 Customer Programs & Projects has changed significantly due to new activities included
9 managing the Office of Customer Privacy in support of SDG&E’s privacy goals and objectives;
10 overseeing the delivery of major Customer Service projects and initiatives; and business
11 integration of technology including HAN support. Furthermore, the group took on new activities
12 such as conducting a third party privacy audit as ordered by the Commission.

13 ORA also ignores the fact that current SPP-related activities need to continue beyond the
14 expiration of the DPBA need to be funded starting in TY 2016 as discussed below. Any
15 disallowance will have a direct impact on SDG&E’s customers because like any demand
16 response program customer support is essential. For these reasons, using the BY 2013 adjusted-
17 recorded expenses provides a reasonable starting point for future expenditures. The future
18 expenditures as shown in my direct testimony¹⁹² should be evaluated on their merits by the
19 Commission and funded appropriately.

20 ORA also states “SDG&E’s expenses decreased by \$0.536 million between 2013 and
21 2014 from \$2.721 million in 2013 to \$2.185 million in 2014.”¹⁹³ and “SDG&E’s 2014 recorded
22 expenses of \$2.185 million is \$0.536 million less than its 2014 forecast of \$2.721 million.”¹⁹⁴

23 ORA improperly assumes that 2014 adjusted-recorded expenses being less than the 2014
24 GRC forecast is relevant and should be used to call into question the TY 2016 forecast. Because
25 of SDG&E’s commitment of nearly \$3 million in reductions by TY 2016 as shown in Appendix
26 C, Supplemental Tables, Attachment C.1. SDG&E must accelerate reductions in forecast year
27 2014 in order to achieve the TY 2016 embedded cost reductions. SDG&E has committed to

¹⁹⁰ Exhibit ORA-13, p. 39, lines 11-12.

¹⁹¹ Exhibit SDG&E-14, p. BMB-106, line 12-19.

¹⁹² Exhibit SDG&E-14, p. BMB-106, beginning on line 21 to BMB-111.

¹⁹³ Exhibit ORA-13, p. 39, lines 12-14.

¹⁹⁴ Exhibit ORA-13, p. 39, lines 14-15.

1 efficiency gains by TY 2016 and therefore is attempting to achieve these efficiency gains in 2014
2 and 2015. SDG&E disagrees with ORA's assumptions and urges the CPUC to fully fund these
3 incremental activities for Customer Programs & Projects.
4

5 **ORA continues to ignore ongoing activities that are currently funded through**
6 **SDG&E's Dynamic Pricing Balancing Account ("DPBA") that will transition to O&M in**
7 **TY 2016**
8

9 As presented in my direct testimony,¹⁹⁵ I am requesting \$199,000 to support the Smart
10 Pricing Program (SPP) rates and default Critical Peak Pricing (CPP-D) for medium business
11 customers. The positions include a Program Assistant, Program Advisor and 20% of a Program
12 Manager. Half of these positions are funded through the DPBA and are being transitioned to
13 O&M in TY 2016. In addition, Customer Programs & Projects is requesting \$82,000 for
14 consulting services to evaluate the program and impacts of the rates on customer participation,
15 compare best practices, and investigate opportunities to enhance program design and
16 implementation.

17 Like other demand response programs, these funds will allow SDG&E to provide its
18 customers with program support and to explore and research how to connect these new
19 customers into SDG&E's existing demand response portfolio.
20

21 **ORA's argument on funding Customer Privacy activities is flawed.**
22

23 As presented in my direct testimony,¹⁹⁶ I am requesting \$170,000 for two Customer
24 Privacy Specialists to support ongoing and new customer privacy initiatives. ORA rejects this
25 request because:
26

27 "SDG&E's historical expenses include costs incurred for Customer Privacy activity, but
28 it is unable to identify and provide the recorded costs for 2009-2011 and can identify only
29 a small portion of recorded 2012 costs. SDG&E states it "did not track Customer Privacy

¹⁹⁵ Exhibit SDG&E-14, BMB-107, beginning on line 1.

¹⁹⁶ Exhibit SDG&E-14, p. BMB-109, beginning on line 15.

costs separately until the centralization of the Customer Privacy department in late 2012.”
 (SDG&E response to ORA-SDG&E-051-TLG, Q20-c). Since SDG&E did not
 provide/demonstrate the amount of historical costs incurred for Customer Privacy activity
 then its request for incremental funding should be denied.”¹⁹⁷

As mentioned above, SDG&E did not track customer privacy costs until the department
 was formed in late 2012. In its response to ORA-SDG&E-051-TLG, Q20-c, SDG&E
 inadvertently excluded its privacy-related costs that were incurred once the Customer Privacy
 department was formed. Therefore, SDG&E submitted a supplemental response to ORA which
 provided the following Table BMB-16 to show the costs incurred during 2012 and 2013. (See
 SDG&E response to ORA-SDG&E-DR-051-TLG, Q20c in Appendix A, SDG&E Responses to
 Data Requests, Attachment A.7.)

TABLE BMB-16
2012 and 2013 Customer Privacy Costs

In 2013\$ (000) Incurred Costs								
Adjusted-Recorded								
Years	2012				2013			
	Labor	Non-Labor	Total	FTE's	Labor	Non-Labor	Total	FTE's
Customer Privacy Cost Center	30	0	30	0.2	193	275	468	2.1

Note: Totals may include rounding differences.

The two Customer Specialists included in SDG&E’s TY 2016 forecast are in addition to
 the two full-time employees in SDG&E’s BY 2013. These positions will manage the activities
 adopted by CPUC D.11-07-056, D.12-08-045, and CPUC D.14-05-016. These decisions adopt
 rules to protect privacy and security and provide access to energy usage data. These rulings
 coupled with increasing demands from third parties to access customer information add hundreds
 of new privacy requirements and controls that utilities are mandated to adhere to. These
 positions are critical to support the new processes and tools to meet the CPUC’s objectives
 outlined in those decisions.

¹⁹⁷ Exhibit ORA-13, pp. 38-39, footnote 108.

1 **TY 2016 activities cannot be funded by a reallocation of BY 2013 adjusted-recorded**
2 **expenses.**

3
4 ORA states the following:

5
6 “SDG&E’s historical expenses (2009-2013) include costs incurred for onetime, non-
7 recurring and unusual expenses (expenses incurred that are not necessary or required to
8 operate the utility business), which are incorporated into ORA’s TY 2016 estimate and
9 which provides embedded funding that SDG&E can reallocate in the TY for proposed
10 activities.”¹⁹⁸

11
12 SDG&E disagrees with ORA’s assertion that portions of BY 2013 expenses can be
13 reallocated to fund SDG&E’s TY 2016 incremental request. ORA is admitting that additional
14 positions and proposed activities require additional funding, but suggests or claims that
15 incremental funding can be found in “embedded” BY 2013 costs. ORA provides no facts or
16 analysis as to which SDG&E Customer Programs & Projects activities in BY 2013 are “one-
17 time, non-recurring and unusual costs.” ORA provided no workpapers that identified such
18 activities and did not estimate the BY 2013 expenses related to ORA’s claim of “one-time, non-
19 recurring and unusual activities.” ORA’s assumed reallocation of BY 2013 expenses to new or
20 incremental activities can only be feasible if current ongoing activities can be eliminated or
21 reduced. ORA has not identified any specific activities in BY 2013 that can be eliminated or
22 reduced. ORA has effectively rejected funding for SDG&E’s proposed new activities.

23 ORA implicitly rejects the need for the Customer Service Program Management Office
24 (“CS PMO”) management activities in the amount of \$133,000 as presented in my direct
25 testimony.¹⁹⁹ The CS PMO has oversight for all capital project activities related to the system
26 development and enhancement of business processes and solutions to support Customer Service
27 including: 1) providing project management guidance to Project Managers by implementing the
28 use of standards and processes to achieve deliverables and to make more effective use of scarce
29 skills and resources across these projects and programs; 2) the design, build, and implementation

¹⁹⁸ Exhibit ORA-13, p. 40, lines 3-7.

¹⁹⁹ Exhibit SDG&E-14, p. BMB-110, beginning on line 27.

1 activities into business solutions; 3) monitoring risks at a detailed level related to budgets,
2 resources, schedule; 4) status communications to key stakeholders; and 5) providing governance
3 to ensure that decisions are taken by the right people, based on the right information. In addition,
4 ORA does not take issue with SDG&E's proposed Customer Service IT capital projects and
5 authorizes SDG&E's 2014 adjusted-recorded expense level of \$26,239,000. The Customer
6 Service IT capital projects are managed by the CS PMO.

7 The ORA also implicitly rejects an incremental request of \$5,000 for the Customer
8 Products Index annual increase provided for in the software maintenance agreement for
9 SDG&E's Service Order Routing Technology system.²⁰⁰

10 Therefore, the Commission should reject ORA's arguments and accept SDG&E's request
11 of TY 2016 Customer Programs & Projects forecast of \$3,443,000.

12
13 **B. UCAN**

14 **1. Customer Care Issues**

15 **a. SDG&E's Branch Closure Proposal**

16
17 **UCAN's arguments for denying SDG&E's request to close three of its Branch**
18 **Offices are flawed for many reasons.**

19
20 For the most part, UCAN's arguments mirror ORA's arguments for disallowing
21 SDG&E's Branch Office Closures proposal. Therefore, while in some cases I have reiterated my
22 position below, in other cases I refer the reader back to the section of my rebuttal testimony that
23 addresses ORA's same argument. Each of UCAN's points has no merit as explained below.
24

²⁰⁰ Exhibit SDG&E-14, p. BMB-111, beginning on line 12.

1 **UCAN’s examples as to why customers will be inconvenienced have little basis and**
2 **are broad generalizations that are short on facts and analyses.**

3
4 UCAN states:

5
6 “It is essential to provide opportunities for cash payment transactions and non-payment
7 services throughout SDG&E’s service territory for all customers and especially for low-
8 income customers who may have reduced access to Internet and mobile payment methods
9 and reduced mobility to travel to alternate locations.”²⁰¹

10
11 My response to the above is broken down into three main points:

12
13 **One, UCAN is mistaken when it states customers will not be able to make cash**
14 **payments or perform non-payment transactions at an APL.**

15
16 Similar to ORA, UCAN mischaracterizes or falsely implies that closing the offices would
17 preclude customer cash transactions. This inference or implication is simply untrue because
18 customers can make cash payments at APLs. As stated earlier in my rebuttal to ORA,²⁰² our
19 network of APLs has grown. We currently have 64 locations, which is a 25% increase from
20 SDG&E’s TY 2012 GRC (Table BMB-17 shows the distance of SDG&E’s current APLs to the
21 Oceanside, National City, and Downtown Branch Offices).

22

²⁰¹ UCAN testimony, p. 86, lines 10-14.

²⁰² See Section III.A.1.c under the heading “Fifth, customers will not be unduly inconvenienced.”

1 **TABLE BMB-17**

2 **Proximity of Branch Offices to Nearest APLs²⁰³**

Branch Office	< 1 mile	< 2 miles	< 3 miles	< 4 miles	< 5 miles
Oceanside	0	2	5	5	7
National City²⁰⁴	2	4	5	9	13
Downtown²⁰⁵	1	3	5	6	9

3
4 Furthermore, the Oceanside, Downtown, and National City Branch Offices have either
5 moved or temporarily closed in the past and customers found convenient alternatives for making
6 their payments. In fact, the Oceanside office moved three different times since 2003. The
7 following Table BMB-18 provides the old location, new location, and distance for the Oceanside
8 Branch Office moves. In addition, the table shows the type of office - SDG&E, California Coast
9 Credit Union or UPS Store.

10 **TABLE BMB-18**

11 **Oceanside Branch Office Relocations**

Old Location	New Location	Distance From Previous Location (miles)
4200 Oceanside Blvd. (SDG&E)	3910 Vista Way (SDG&E)	4.9
3910 Vista Way (SDG&E)	3485 Marron Road (California Coast Credit Union)	0.69
3485 Marron Road (County Coast Credit Union)	2604-B El Camino Real CB (UPS Store)	3.36

12
13 The following Table BMB-19 provides the old location, new location, and distance for
14 the Downtown Branch Office move. The table also shows what type of office - SDG&E or
15 California Coast Credit Union.

16
²⁰³ See Appendix C, Supplemental Tables, Attachment C.4 for a detailed list of the current APLs within five miles and their proximity to the Oceanside, Downtown, and National City Branch Offices.

²⁰⁴ In addition to APLs, there is a full-service SDG&E Branch Office within three miles and an additional full-service SDG&E Branch Office within five miles.

²⁰⁵ There is also a full-service SDG&E Branch Office within six miles.

1 **TABLE BMB-19**

2 **Downtown Branch Office Relocation**

3

Old Location	New Location	Distance (miles)
101 Ash Street (SDG&E)	440 Beach Street (California Coast Credit Union)	0.29

4

5 In 2009, the National City office was closed for approximately three months for
6 renovations to comply with the Americans with Disabilities Act (“ADA”) standards pursuant to
7 the Memorandum of Understanding between Disability Rights Advocates, SoCalGas and
8 SDG&E, which was adopted in D.08-07-046.

9 During the moves and temporary closure, SDG&E did not receive any complaints from
10 its customers with the exception of one issue regarding the Escondido relocation. The customer
11 said signs were not posted at the old location advising customers of the new location. If the
12 Commission approves the office closures, SDG&E fully intends to place signs at the old office
13 informing customers of the local APLs and the closest Branch Office. In fact, as stated in my
14 direct testimony,²⁰⁶ SDG&E plans an extensive communication plan to affected customers
15 including distributing advance multi-language notices, newspaper ads, direct mail, flyers, Branch
16 Office signage, notices on sdge.com, and meeting with local agencies and officials.

17 Additionally, like the Branches Offices, several of these APLs perform POS ID and have
18 a courtesy phone that connects directly to SDG&E’s CCC allowing customers to perform other
19 non-payment transactions such as turn-ons, turn-offs, pay arrangements, etc.

20 Out of the seven APLs within five miles of the Oceanside office, there is one that offers
21 positive identification (“POS ID”) only which is within four miles. There is also one that offers
22 a courtesy phone and POS ID which is within five miles.

23 Out of the 13 APLs that are currently within five miles of the National City office, there
24 is one APL right next door that offers both POS ID and a courtesy phone. There are two that
25 offer POS ID only; one is within two miles and one is within four miles. There is one APL
26 within four miles that offers a courtesy phone only.

27 Out of the 9 APLs within five miles of the Downtown office, there is one within two
28 miles that offers both POS ID and a courtesy phone. There are three that offer POS ID only; one
29 within one mile, one within three miles, and one within five miles.

²⁰⁶ Exhibit SDG&E-14, pp. BMB-48, starting on line 11 to BMB-49.

1 Customers can perform POS ID at nearby APLs and/or use a courtesy phone to connect
2 directly to SDG&E's CCC. Customers can also call SDG&E's toll free number from anywhere
3 to reach its CCC anytime Monday through Friday, 7 a.m. to 8 p.m. and Saturday, 7 a.m. to 6 p.m.
4 APLs have extended hours and most are open on weekends. CCC hours are also greater than
5 branch office business hours.

6
7 **Two, UCAN's assertion that low-income customers may have reduced access to**
8 **Internet and mobile payment methods are not supported by fact.**

9
10 First, SDG&E is not proposing that customers who currently use the Branch Offices must
11 move to self-service options. There are a large number of APLs geographically around the
12 Branch Offices where customers can make payments with cash and checks or debit cards. Many
13 APLs are located in major chain stores where customers frequently shop (e.g., Walmart and
14 Kmart). If customers would prefer a self-service option, a study by the Department of Health
15 and Human Services shows that approximately 98.5% of California households have telephone
16 service (wireless, landline, or both).²⁰⁷ The Public Policy Institute of California ("PPIC")
17 reported, "nearly all Californians (92%) say they have a cell phone, and 58 percent of them have
18 a smartphone – up from 39 percent in 2011. Most Californians (56%) use their cell phones to
19 access the Internet or email – up 37 points since 2008 and 16 points from 2011."²⁰⁸ In addition,
20 PPIC reported that 77% of California households with income of less than \$40,000 have internet
21 access which is below the BY 2013 median household income of all three proposed office
22 closures.²⁰⁹ Therefore, UCAN has a false belief about low-income customers having access to
23 the Internet and mobile payments to process cash payment transactions and request non-payment
24 services.

25 Furthermore, as presented in my direct testimony, it should be noted the median
26 household income in the areas where the offices are located was higher in BY 2013 than the
27 2013 CARE program income guidelines of \$39,060. The median household income in BY 2013

²⁰⁷ "Wireless Substitution: Early Release of Estimate from the National Health Interview Survey,"
January.

– June 2013, Department of Health and Human Services, National Center for Health Statistics, Dec. 2013
at p. 8. See <http://www.cdc.gov/nchs/data/nhsr/nhsr070.pdf>.

²⁰⁸ PPIC: "Californians & Information," June 2013.

²⁰⁹ "California's Digital Divide," Public Policy Institute of California: June 2013 at p. 7.

1 was \$49,555 for National City²¹⁰, \$46,690 for Downtown San Diego²¹¹, and \$67,639²¹² for
2 Oceanside.

3
4 **Three, UCAN’s assertion that low-income customers may have reduced mobility to**
5 **travel to alternate locations is unsupported by fact.**

6
7 In my direct testimony,²¹³ I provided information regarding local transportation services
8 available to customers to inform the Commission there are convenient public transportation
9 options available to customers if necessary. UCAN’s implicit assumption or claim that low-
10 income customers will not use public or alternative transportation services is contradicted by
11 common sense and logic. Unless a customer walks to the Branch Office, they are already using
12 some means of transportation and with the quantity of APLs close to the existing Branch Offices,
13 an APL may actually be more convenient. Also, as shown in my direct testimony,²¹⁴ SDG&E
14 has partnered with two large retail chains (Walmart and Kmart) so customers have APL options
15 at locations they likely already frequent.

16
17 **UCAN is wrong in its assertion that SDG&E’s proposal will make it more difficult**
18 **for customers who rely on paper bills to make their payments and transact other business**
19 **with SDG&E.**

20
21 UCAN states:

22
23 “UCAN additionally finds it incongruous that SDG&E proposes to spend \$3.3 million to
24 redesign its paper bills while at the same time, in exchange for annual savings of just
25 \$300,000, making it more difficult for customers who rely on paper bills to make their
26 payments and transact other business with the utility.”²¹⁵

27

²¹⁰ Exhibit SDG&E-14, p. BMB-45, lines 12-13.

²¹¹ Exhibit SDG&E-14, p. BMB-46, lines 22-23.

²¹² Exhibit SDG&E-14, p. BMB-47, lines 29.

²¹³ Exhibit SDG&E-14, pp. 44, 46, and 47.

²¹⁴ Exhibit SDG&E-14, p. BMB-41, Table 21.

²¹⁵ UCAN testimony, p. 86, lines 15-19.

UCAN's point is unclear, but it appears they are implying that all customers who receive a paper bill also pay at Branch Offices. Table BMB-20 shows the total number of payments made at Oceanside, Downtown, and National City Branch Offices in BY 2013 and 2014. The data shows the payments made at these offices were just a fraction of the total number of paper bills that were mailed.

TABLE BMB-20
Total Number of Payments Compared to
Total Number of Paper Bills Mailed

Year	2013		2014	
Total Paper Bills Mailed [A]	10,919,269		10,643,040	
Branch Office	Volume of Payments [B]	% of Payments Made at a Branch Office Relative to Total Paper Bills Mailed [C] = (B/A)	Volume of Payments [B]	% of Payments Made at a Branch Office Relative to Total Paper Bills Mailed [C] = (B/A)
Chula Vista	200,201	1.83%	165,167	1.55%
Downtown	33,785	0.31%	28,703	0.27%
El Cajon	159,404	1.46%	146,836	1.38%
Escondido	143,831	1.32%	130,217	1.22%
Market Creek	167,738	1.54%	146,004	1.37%
National City	109,302	1.00%	99,320	0.93%
Oceanside	14,722	0.13%	11,363	0.11%

The correlation UCAN tries to make between paper bills and SDG&E's Bill Redesign Project is unclear; the two have nothing to do with each other.

1 **SDG&E should not be required to conduct customer research prior to closing its**
2 **Branch Offices.**

3
4 Like ORA, UCAN proposes SDG&E survey customers who may be affected by the
5 closures prior to Commission approval.

6
7 UCAN specifically states:

8
9 “SDG&E does not appear to have solicited input from customers who would be most
10 affected by these branch office closures to learn how they use branch offices and how
11 they experiences branches in comparison to APLs, as SoCalGas did in 2014 as part of its
12 branch closure application.”²¹⁶

13
14 UCAN goes on to say:

15
16 “As noted by ORA in its testimony, SDG&E did not conduct any studies to determine if
17 customers had access to equipment or established bank accounts that would enable them
18 to utilize branch office alternatives such as “self-service payment options like My
19 Account, home banking, and the SDG&E mobile application.”²¹⁷

20
21 My rebuttal to ORA addresses the lack of value and necessity for SDG&E to conduct
22 customer surveys prior to approval of its Branch Office closures.²¹⁸ To summarize:

- 23
- The Downtown, National City, and Oceanside Branch Offices are the three Branch
24 Offices with the lowest volume of payments with a long-term trend in declining
25 payment transactions.
 - The array and convenience of options available to customers.
- 26

²¹⁶ UCAN testimony, p. 87, lines 3-6.

²¹⁷ UCAN testimony, p. 87, lines 6-11.

²¹⁸ See Section III.A.1.c of my rebuttal to ORA under the heading “Second, SDG&E should not be required to conduct customer research prior to closing its Branch Offices because its case stands on its own merits.”

- 1 • The Commission has not ordered SDG&E to survey its customers in the past when
2 SDG&E sought to close an office.
- 3 • The cost savings associated with the closures should be passed onto customers
4 without further delay.

5 While SoCalGas did survey its customers, as UCAN calls out, the study demonstrated
6 customers primarily use Branch Offices to remit payments, even though customers are aware of
7 and have access to APLs.²¹⁹ SDG&E has shown in my prepared direct testimony that over 96%
8 of transactions at the Oceanside, Downtown, and National City Branch Offices are indeed
9 payment transactions,²²⁰ thereby confirming SoCalGas survey results. Thus, the Commission
10 should not delay passing along the savings to customers by requiring SDG&E to survey its
11 customers prior to closing the three offices given that survey results will provide no additional
12 facts that have not already been established by historical transactions data.

13

14 **UCAN takes issue with only four Branch Offices remaining and asserts the closures**
15 **would reduce opportunities for customers.**

16

17 UCAN asserts:

18

19 “The closure of two branch offices and conversion of one to an APL would leave only
20 four branch offices for the entire SDG&E service territory. This would significantly
21 reduce the opportunities for customers to interact face-to-face with SDG&E employees
22 and to conduct certain other transactions that cannot be completed at APLs. It is also
23 likely to increase wait times at the remaining branch offices.”²²¹

24

25 I will address each of UCAN’s arguments independently.

26

²¹⁹ “Prepared Rebuttal Testimony of Michael H. Baldwin on Behalf of Southern California Gas Company,” filed in A.13-09-010, April 28, 2014, pp. 16-17 (Attachment N).

²²⁰ Exhibit SDG&E-14, p. BMB-40, Table 20.

²²¹ UCAN testimony, p. 87, lines 14-19.

1 **UCAN implies that having only four SDG&E Branch Offices will be a problem.**

2
3 The Commission should note that Pacific Gas and Electric Company (PG&E) has only 75
4 Branches Offices and approximately 650 APLs for its 70,000 square miles of service territory.
5 Southern California Edison Company (SCE) has only 11 Branch Offices and approximately 300
6 APLs for its 50,000 square miles of service territory. If SoCalGas's closures are approved, they
7 will have 41 Branch Offices and approximately 300 APLs for its 20,000 square miles of service
8 territory. If you compare SDG&E's service territory to the other utilities service territories as
9 shown in Table BMB-21 you can see that SDG&E will have the same or more payment locations
10 (Branch Offices plus APLs) per square mile than that of the other utilities.
11

12 **TABLE BMB-21**
13 **California Investor Owned Utilities**
14 **Number of Pay Locations Per Square Mile of Service Territory**
15

Utility	Approx. # of Pay Locations [A]	Square Miles [B]	Approx. # of Pay Locations Per Square Mile [C] = (A/B)
PG&E	725	70,000	0.01
SCE	311	50,000	0.01
SCG*	341	20,000	0.02
SDG&E*	79	4,100	0.02

* Assumes proposed office closures are approved.

16
17 Therefore, UCAN's concern with SDG&E having only four Branch Offices is not a valid
18 reason for not closing the three offices.
19

1 **UCAN has not shown a need for customers to interact face-to-face with an SDG&E**
2 **employee.**

3
4 First, UCAN does not provide any evidence that customers prefer to interact face-to-face
5 with an SDG&E employee. In fact, since most customers do not frequent Branch Offices, it
6 proves the overwhelming majority of customers actually prefer interacting over SDG&E's toll
7 free number or to not interact with an employee at all by using SDG&E's self-service options.

8 I have shown that the three offices SDG&E is proposing to close perform the lowest
9 number of payment transactions and have been declining over time.²²² I have also shown that
10 the overwhelming majority of transactions handled at SDG&E's Branch Offices are payment
11 transactions.²²³ Furthermore, as presented in my direct testimony,²²⁴ customers' preferences over
12 the last several years have revealed that self-service options have grown significantly (from 49%
13 of customers making payments via self-service in 2009 to 63% in BY 2013) and traditional
14 payment options, such as making a payment at a Branch Office have declined. This can be
15 attributed to the increased availability and sophistication of self-service payment options,
16 including paying through My Account, BillMatrix,²²⁵ home banking, direct debit, electronic data
17 interchange ("EDI"), and pay-by-phone through SDG&E's IVR System. Other traditional
18 payment options are still available, such as mail and APLs, making the need to visit a Branch
19 Office unnecessary.

20 Moreover, the Oceanside Office isn't even staffed with an SDG&E employee. The office
21 is staffed with UPS employees, and SDG&E has not received any feedback from customers
22 indicating that this is not acceptable. If customers of the Downtown or National City offices
23 wish to interact face-to-face with an employee, they have the option of visiting one of the two
24 conveniently located full-service Branch Offices (Chula Vista Branch Office or Market Creek
25 Branch Office).

26

²²² Exhibit SDG&E-14, p. BMB-39, Table 19.

²²³ Exhibit SDG&E-14, p. BMB-40, Table 20.

²²⁴ Exhibit SDG&E-14, p. BMB-42, Chart 4.

²²⁵ Customers can use most ATM cards, debit cards, MasterCard® and Visa® credit cards and electronic checks to pay their bill. These payment options are offered through BillMatrix, an independent service provider.

1 **UCAN has not provided any supporting facts that wait times will increase at the**
2 **other Branch Offices.**

3
4 Since the Oceanside office does not have an SDG&E employee, the Oceanside office
5 does not perform any transactions that neighboring APLs cannot also perform. Therefore, there
6 would be no need for an Oceanside customer to go to another SDG&E Branch Office. For
7 Downtown, SDG&E recently secured another APL within walking distance of the Downtown
8 branch where customers can perform POS ID and has the option of using the APLs store phone.
9 Regarding National City, there is an APL within the same shopping mall only 20 feet away
10 where customers can perform POS ID and use a courtesy phone. Customers can also go to the
11 Market Creek Branch Office which is within three miles or the Chula Vista Branch Office which
12 is within five miles of the National City Branch Office. As stated in my direct testimony,²²⁶ two
13 employees from the National City office will be relocated to other offices to compensate for any
14 increased volume due to the closure of the National City Branch Office.

15
16 **UCAN falsely asserts customers prefer Branch Offices.**

17
18 UCAN asserts:

19
20 “APLs do not provide the same level of service as branch offices do. This is evident in
21 the strong preference that customers have demonstrated for branch offices over APLs.
22 Despite there being more than ten times as many APLs as branch offices, branch offices
23 served approximately 65% of in-person payment transactions in 2013 (Figure 18).”²²⁷

24
25 UCAN’s statement is misleading. Customers are, and have been for some time,
26 migrating from Branch Offices to APLs and to self-service to perform payment transactions.²²⁸

27 While the total number of in-person payments has declined largely due to self-service
28 options, the percentage of in-person payments at APLs have increased compared to in-person
29 payments made at Branch Offices. In fact, since 2009 the total in-person payments made at

²²⁶ Exhibit SDG&E-14, p. BMB-45, lines 16-19.

²²⁷ UCAN testimony, p. 88, lines 2-6. Figure 18 is Chart 1 shown on p. BMB-37 of my direct testimony.

²²⁸ Exhibit SDG&E-14, p. BMB-42, Chart 4.

1 APLs within SDG&E's service territory has increased from approximately 23% in 2009 to
 2 approximately 27% in BY 2013 as shown in Table BMB-22.

3 **TABLE BMB-22**
 4 **Branch Office and APL Volume of Payments**

	2009	2010	2011	2012	2013
Oceanside	14,560	22,667	21,514	17,527	14,722
APL within 5 Miles	1,731	5,545	11,675	28,914	34,406
% Pmts at APLs	10.6%	19.7%	35.2%	62.3%	70.0%
Downtown	39,344	38,472	37,905	35,799	33,785
APL within 5 Miles	9,752	12,761	18,049	21,154	25,521
% Pmts at APLs	19.9%	24.9%	32.3%	37.1%	43.0%
National City	106,653	105,867	117,522	112,548	109,302
APL within 5 Miles	32,048	22,957	23,223	29,902	37,864
% Pmts at APLs	23.1%	17.8%	16.5%	21.0%	25.7%
Total SDG&E B.O.	936,490	912,016	923,956	866,007	828,833
Total SDG&E APL	285,322	280,260	302,917	286,491	298,114
% Pmts at APLs	23.4%	23.5%	24.7%	24.9%	26.5%

5
 6
 7 Similarly, the percentage of in-person payments made within a five mile radius of the
 8 three Branch Offices SDG&E is proposing to close have also increased (see Table BMB-22
 9 above).

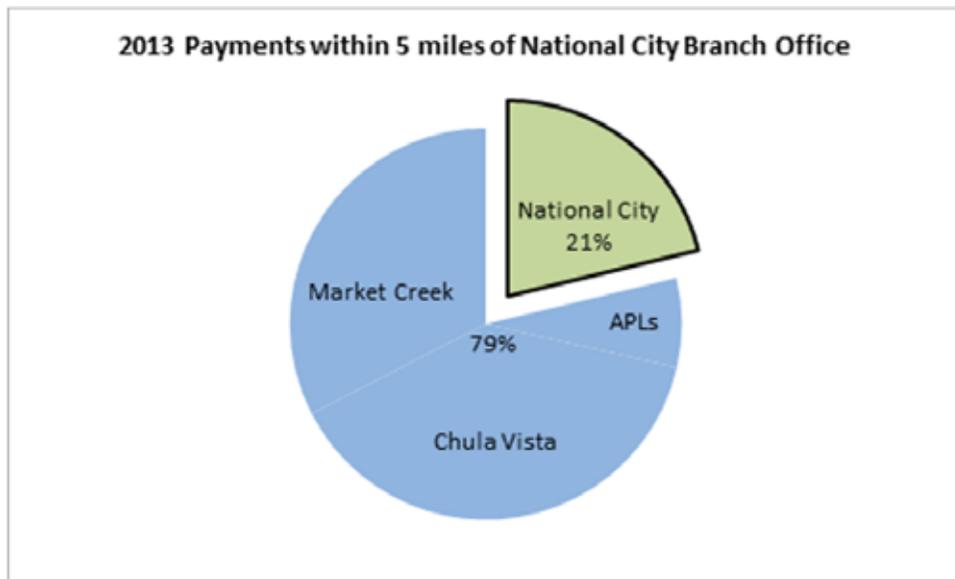
10 When compared with the overall BY 2013 average of 27% for all in-person payments
 11 being made at an APL, the Oceanside Branch Office area APLs comprised 70% of in-person
 12 payments meaning that 7 out of 10 customers that make in-person payments in this area do so at
 13 an APL. Only 3 of 10 customers in this area use the Branch Office in this area for an in-service
 14 payment.

15 The Downtown Branch Office area APLs comprised 43% of in-person payments, and the
 16 National City Branch Office area APLs comprised 26% of in-person payments. While the
 17 National City Branch Office area is approximately the same as the overall average, this can
 18 likely be attributed to the fact that there are two additional full-service SDG&E Branch Offices
 19 within the five mile radius of the National City Branch Office. While the total percentage of
 20 APL in-person payments for the National City Branch Office is only 26%, the total number of all
 21 in-person payments within a five mile radius of National City is 78.8% when the other two
 22 Branch Offices are included (see Chart BMB-3 and Table BMB-23). In other words, almost 8

1 out of 10 in-person payments within a five mile radius of our National City Branch Office are
 2 made at a location other than National City.

3 It is also worth noting in 2009 there were anomalous results for the National City office
 4 as it was closed for renovations. The National City Branch Office was closed for approximately
 5 three months to comply with the ADA standards pursuant to the Memorandum of Understanding
 6 between Disability Rights Advocates, SoCalGas and SDG&E, which was adopted in D.08-07-
 7 046.

8
 9 **CHART BMB-3**



10
 11
 12 **TABLE BMB-23**

13 **Payments Within 5 Miles of National City Branch Office**

Branch Office	2009	2010	2011	2012	2013
National City	106,653	105,867	117,522	112,548	109,302
APL within 5 Miles	32,048	22,957	23,223	29,902	37,864
Chula Vista	232,453	229,689	228,600	213,404	200,201
Market Creek	189,087	188,067	186,966	174,317	167,738
% Pmts National City	19.0%	19.4%	21.1%	21.2%	21.2%

1 In addition, as presented in my direct testimony,²²⁹ customer preferences over the last
2 several years show self-service options have grown significantly and traditional payment options,
3 such as making a payment at a Branch Office, has declined. In 2009, 49% of customers made
4 payments via self-service and in BY 2013, 63% of customers made payments via self-service.
5

6 **UCAN fails at its attempts to draw a conclusion that services offered through**
7 **Branch Offices are far better for customers.**
8

9 UCAN asserts:

10
11 “Branch offices provide a more complete set of options for customer to conduct both
12 payment and non-payment transactions. For example:²³⁰

- 13 • All branch offices accept credit and debit cards, whereas only two APLs (Walmart
14 and Kmart stores) accept debit cards directly;
- 15 • Only 11 of our current 75 APLs have direct connect phones that enable customers to
16 speak directly with an SDG&E representative for assistance, as one can do at any
17 branch office;
- 18 • All five of the dedicated branch offices have computers that customers can use;
- 19 • Only 15 of our current 75 APLs offer customer identification (ID) verification
20 service, an important service that is offered at all branch offices.”²³¹
21

22 I address each of UCAN’s examples individually.
23

²²⁹ Exhibit SDG&E-14, p. BMB-42, Chart 4.

²³⁰ ‘Generally speaking, every customers must make a payment each month, whereas non-payment transactions occur only under specific circumstances, such as the start of service, in times of financial hardship (e.g., to negotiate a payment plan or to get a service shut-off reversed), or prior to a construction project.’

²³¹ UCAN testimony, p. 89, lines 2-12.

1 **All Branch Offices accept credit and debit cards, whereas only two APLs (Walmart**
2 **and Kmart stores) accept debit cards directly.**

3
4 First, Walmart and Kmart hardly represent only two APLs. Out of the 75 APLs SDG&E
5 had at the time of the GRC filing, there were a total of 28 Walmart APLs and 4 Kmart APLs.
6 Furthermore, this is not a branch office issue as SDG&E's Branch Offices do not accept these
7 types of payments. Whether at an SDG&E Branch Office, APL, or in a customer's home, to
8 make a credit or debit card payment a customer must contact Bill Matrix (an independent service
9 provider) via telephone. An SDG&E Branch Office in-person face-to-face contact does not and
10 cannot process a credit or debit card payment. As presented in my direct testimony,²³²
11 BillMatrix accepts most ATM cards, debit cards, MasterCard® and Visa® credit cards and
12 electronic checks for customers to pay their bill. The one exception is Walmart and Kmart APLs
13 accept debit cards.

14
15 **11 of the 75 APLs have direct connect phones that enable customers to speak**
16 **directly with an SDG&E representative for assistance, as one can do at any branch office.**

17
18 The fact that customers can call SDG&E's toll free number from anywhere to reach its
19 CCC Monday through Friday, 7 a.m. to 8 p.m. and Saturday, 7 a.m. to 6 p.m. should not be
20 disregarded, particularly since PPIC reported, "nearly all Californians (92%) say they have a cell
21 phone..."²³³ Common sense would indicate that only in very rare circumstances would a
22 customer not have access to a phone. The likelihood that a customer with an SDG&E account
23 (or establishing an account) will have access to a telephone (even if not their own phone) would
24 be even greater than 92%.

25

²³² Exhibit SDG&E-14, p. BMB-42, footnote 37.

²³³ PPIC: "Californians & Information," June 2013.

1 **All five of the dedicated Branch Offices have computers that customers can use.**

2
3 UCAN is wrong in its assumption — only SDG&E’s Chula Vista, Escondido, and Market
4 Creek Branch Offices have computers in the lobby accessible to customers. These are not
5 branches SDG&E is proposing to close. Therefore, this argument is irrelevant.

6
7 **Only 15 of the 75 APLs offer customer identification (ID) verification service, an**
8 **important service that is offered at all Branch Offices.**

9
10 UCAN fails at its attempt to make this seem significant. What’s important is that for the
11 three Branch Offices SDG&E is proposing to close, there are APLs in close proximity that offer
12 customer identification verification service (or POS ID).

13 Additionally, like the Branches Offices, several of these APLs perform POS ID and have
14 a courtesy phone that connects directly to SDG&E’s CCC.

15 Out of the seven APLs currently within five miles of the Oceanside office, there is one
16 that offers POS ID only which is within four miles. There is also one that offers a courtesy
17 phone and POS ID which is within five miles.

18 Out of the 13 APLs that are currently within five miles of the National City office, there
19 is one APL right next door that offers both POS ID and a courtesy phone. There are two that
20 offer POS ID only; one is within two miles and one is within four miles. There is one APL
21 within four miles that offers a courtesy phone only. In addition to APLs, there is a full-service
22 SDG&E Branch Office within three miles and an additional full-service SDG&E Branch Office
23 within five miles.

24 Out of the 9 APLs currently within five miles of the Downtown office, there is one within
25 two miles that offers both POS ID and a courtesy phone. There are three that offer POS ID only;
26 one within one mile, one within three miles, and one within five miles. Out of the seven APLs
27 within five miles of the Oceanside office, there are two that offer POS ID; one is within four
28 miles and the other is within five miles. There is also a full-service SDG&E Branch Office
29 within six miles.

30 And to be clear, POS ID transactions are only a fraction of the 3% of non-payment
31 transactions conducted at SDG&E Branch Offices.

1 **SDG&E disagrees that all non-payment transactions must be performed at a**
2 **Branch Office.**

3
4 UCAN asserts:

5
6 “SDG&E minimizes the importance of branch offices for non-payment transactions by
7 stating that only 3% of branch office transactions are non-payment transaction. However,
8 given that there are so many more payment transactions than non-payment transactions
9 overall, this comparison does not indicate how important branch offices are for non-
10 payment transactions. In particular, it provides no indication of the share of non-payment
11 transactions that occur at branch offices.”²³⁴

12
13 First, the purpose of pointing out that 3% percent of transactions at SDG&E’s Branch
14 Offices are non-payment transactions only reaffirms that the primary service provided (which are
15 payment transactions) at the Branches can be provided at any of the current 64 APLs available to
16 customers. For the small percentage of non-payment transactions conducted at the Branch
17 Offices, customers can go to one of our local APLs where they can either use a courtesy phone to
18 connect to SDG&E’s CCC or perform POS ID. In other words, customers have other options
19 besides Branch Offices for making non-payment transactions.

20 Again, there are a sufficient number of self-service payment options available to
21 customers including paying through My Account, BillMatrix, home banking, direct debit,
22 electronic data interchange (“EDI”), and pay-by-phone through SDG&E’s IVR System.

23 Customers can also call SDG&E’s toll free number from anywhere to reach its CCC
24 Monday through Friday, 7 a.m. to 8 p.m. and Saturday, 7 a.m. to 6 p.m.

25

²³⁴ UCAN testimony, p. 89, beginning on line 15 to page 90.

1 **UCAN incorrectly claims for non-payment transactions there is no equivalent**
2 **substitute for a branch office.**

3
4 UCAN claims:

5
6 “For non-payment transactions, there is no equivalent substitute for a branch office.
7 Branch offices provide the only in-person location for customers to make many non-
8 payment transactions, such as negotiating a payment plan, requesting new service,
9 making an appointment for a pilot light or meter inspection, inquiring about trenching for
10 a construction job, or disputing a bill. Furthermore, none of these transactions can be
11 completed at the 64 APLs that do not have direct connect phones, and neither can ID
12 verification, which must be done prior to starting service, be performed at 60 of the
13 APLs. Some of the non-payment transactions require involved conversations and/or joint
14 review of documents, which can likely be accomplished most efficiently in-person. For
15 customers who are not well versed with using the Internet or who face language barriers
16 or other barriers that make it more difficult to discuss issues over the phone, in-person
17 communication is especially important.”²³⁵

18
19 As stated above²³⁶, customers can go to one of the nearby APLs to perform POS ID
20 and/or use a courtesy phone to connect directly to SDG&E’s CCC. Again, customers can also
21 call SDG&E’s toll free number from anywhere to reach its CCC Monday through Friday, 7 a.m.
22 to 8 p.m. and Saturday, 7 a.m. to 6 p.m. These are reasonable options for customers, and they
23 are using them as I’ve proven elsewhere in my rebuttal testimony. It is a false assumption that
24 in-person service at SDG&E Branch Offices offers customers additional language options; often
25 times customers have to be referred to the courtesy phone to speak with a representative who can
26 assist them. If a “conversation” is required, then SDG&E’s CCC provides greater hours and
27 Saturdays, bi-lingual and language line services and immediate access to customer records. The
28 only transactions that may require an APL visit is POS ID.

29

²³⁵ UCAN testimony, p. 90, lines 3-16.

²³⁶ See Section III.A.1.c under the heading “Fifth, customers will not be unduly inconvenienced.”

1 **UCAN argues the National City Branch Office does not necessarily show a decline**
2 **in annual transactions.**

3
4 “.. First of all, SDG&E’s data show higher annual transactions at the National City office
5 in 2011-2013 than in 2009 and 2010 so it is not clear that there is a long-term decline in
6 the number of transactions at this location. In addition, the decline or increase in
7 transactions is secondary to the fact that many customers still rely on these locations. In
8 2013, the National City Branch Office conducted 109,302 payment transactions. That
9 same year, the Downtown and Oceanside branch offices conducted 33,785 and 14,722
10 payment transactions, respectively. It should be assumed that non-payment transactions
11 were additionally conducted at each of these branch offices.”²³⁷

12
13 UCAN ignores the fact that the National City Branch Office was closed in 2009 resulting
14 in lower transaction volumes. This was made clear in my direct testimony.²³⁸ To further
15 substantiate this fact, during 2008 the volume of payments at the National City Branch Office
16 totaled 136,843 which shows there was a significant reduction in 2009 payment transactions at
17 this office.

18
19 **CARE customers will not be adversely impacted by the closures as UCAN suggests.**

20
21 “The three branch offices that SDG&E is considering closing or downgrading are used
22 disproportionately by CARE customers. In 2013, approximately 60% of customers that
23 made payments at the National City Branch Office were CARE customers, as were 38%
24 of customers that made payments at the Downtown Branch Office and 41% of customers
25 that made payments at the Oceanside Branch Office (Figure 19). In all, CARE
26 customers made over 80,000 payment transactions at these three branch offices in
27 2013.”²³⁹

28

²³⁷ UCAN testimony, p. 90-91, beginning on line 20.

²³⁸ Exhibit SDG&E-14, p. BMB-39, lines 4-6.

²³⁹ UCAN testimony, p. 91, lines 10-16.

1 Of all of the payments made at SDG&E's Branch Offices during BY 2013, 53% were
2 made by CARE customers. Both the Downtown and Oceanside Branch Offices were below the
3 53% average at 38% and 41%, respectively. While National City was at 60%, CARE customers
4 who frequent the National City Branch Office have several convenient options and won't be
5 unduly impacted. The options include 1) the APL right next door which has a courtesy phone
6 and performs POS ID, 2) 12 other APLs located close by, or 3) the Market Creek or Chula Vista
7 Branch Offices which are within three and five miles, respectively. Additionally, the fact is that
8 only 23% of CARE customers make in-person payments (APLs and Branch Offices) — 77% of
9 CARE customers pay either through self-service or by mail (see Appendix C, Supplemental
10 Tables, Attachment C.3).

11
12 **UCAN ignores the median household income levels in the areas where SDG&E is**
13 **proposing to close its offices.**

14
15 UCAN states:

16
17 “In D.92-08-038 the Commission noted, ‘for those who do not own a car and where
18 public transportation options are limited, distances of more than a mile can pose a
19 significant hardship.’ Low-income customers are least likely to own cars, and while
20 public transportation may be available, it does not come for free but rather is another
21 drain on an individual's resources. While SDG&E notes that it has APLs within a
22 distance of three miles from each of the Branch Offices in question, most are located at a
23 distance greater than a mile, and none of the closed locations will have another branch
24 office within a distance of one mile. In fact, if the Oceanside Branch Office is closed,
25 the next nearest branch is the Escondido Branch Office, at a driving distance of 16
26 miles.”²⁴⁰

27
28 First, UCAN has not provided a need for an Oceanside customer to travel to the
29 Escondido Branch Office when they can perform their transactions at an APL. A customer who
30 in the past may have gone to the Oceanside Branch Office can do all the same transactions

²⁴⁰ UCAN Testimony, pp. 92-93, beginning at line 7.

1 within five miles at an APL. As previously stated, there are a sufficient number of self-service
2 payment options available to customers including paying through My Account, BillMatrix²⁴¹,
3 home banking, direct debit, electronic data interchange (“EDI”), and pay-by-phone through
4 SDG&E’s IVR System.

5 Furthermore, as presented in my direct testimony²⁴² and as shown in Table BMB-24, the
6 three areas where SDG&E is proposing to close its offices, the BY 2013 median household
7 income was above the 2013 CARE income guidelines of \$39,060.

8
9 **TABLE BMB-24**
10 **2013 Median Household Income for Customers**
11 **Associated with SDG&E’s**
12 **Oceanside, Downtown, and National City Branch Offices**
13

Branch Office	2013 Median Income
Oceanside	\$67,639
Downtown ²⁴³	\$46,690
National City ²⁴⁴	\$49,555

14
15 **UCAN is grasping for CPUC support by citing a decision from seven years ago as its**
16 **basis for not adopting SDG&E’s Branch Office closures.**

17
18 UCAN asserts:

19
20 “The Commission has not in the past found higher costs to be a sufficient reason to close
21 a branch. In D.08-07-046 the Commission denied SoCalGas’s request to close seven
22 branch offices, despite their higher costs, because low income customers would be
23 harmed:

24

²⁴¹ Customers can use most ATM cards, debit cards, MasterCard® and Visa® credit cards and electronic checks to pay their bill. These payment options are offered through BillMatrix, an independent service provider.

²⁴² Exhibit SDG&E-14, pp. BMB-45, beginning on line 12 to BMB-48.

²⁴³ Exhibit SDG&E-14, p. BMB-46, lines 22-23.

²⁴⁴ Exhibit SDG&E-14, p. BMB-45, lines 12-13.

1 We find that the proposal to close branch offices is problematic for
2 low-income customers. ... The reality is that some customers are
3 more expensive to service than others: we cannot presume all to
4 have internet bill-paying capability or even checking accounts.
5 Therefore, we must find a way to serve these customers' needs for
6 bill payment, customer service, and information. The traditional
7 branch offices serve these functions.

8 It would be unreasonable to place a higher burden on low-income customers each time
9 they need to pay a bill or discuss their utility service with SDG&E in exchange for
10 relatively minor cost savings.”²⁴⁵

11
12 I maintain that since 2008, customers have come a long way. More customers are using
13 self-service options and more customers are using APLs. While we cannot presume all
14 customers have Internet, as stated earlier where UCAN raises this same argument, PPIC reported
15 that 77% of California households with income of less than \$40,000 have internet access.²⁴⁶ This
16 shows that only 23% of low-income customers don't have Internet access. Furthermore, as
17 shown in Table BMB-24 above in the three areas where SDG&E is proposing to close offices,
18 the BY 2013 median household income was above the 2013 CARE income guidelines of
19 \$39,060.

20
21 **UCAN is clearly confused about SDG&E's Oceanside Branch Office.**

22
23 UCAN states:

24
25 “SDG&E has a number of options available, including converting the office to a
26 dedicated branch, sharing space with the new lease-holder, or finding nearby office space
27 to either share or use as a dedicated branch office. The loss of the credit union should not

²⁴⁵ UCAN testimony, p. 93, lines 6-20.

²⁴⁶ “California's Digital Divide,” Public Policy Institute of California: June 2013 at p. 7.

1 result in the permanent closure of a branch office, particularly one that is so distant from
2 other branch office locations.”²⁴⁷

3
4 UCAN is mixing up SDG&E’s Oceanside office where we have a joint partnership with
5 UPS and SDG&E’s Downtown office where we have a joint partnership with California Coast
6 Credit Union. That being said, SDG&E has no control over the vendors and their lease. It is
7 illogical for UCAN to assume that any of these options are feasible. SDG&E’s proposal to close
8 these two locations had nothing to do with the potential of losing a lease but had to do with the
9 criteria SDG&E’s used in its analysis to close its offices including 1) they are the lowest volume
10 Branch Offices in SDG&E’s service territory 2) have been experiencing a long-term trend in
11 declining payment transactions, and 3) they have the highest cost per transaction of all Branch
12 Offices.

13
14 **The steps UCAN recommends SDG&E take if the Branch Office closures are**
15 **approved should be denied.**

16
17 Following are the irrational steps outlined by UCAN:²⁴⁸

- 18 1. SDG&E should swiftly undertake the upgrading of all APLs in the vicinity of each
19 closed or downgraded branch office to include direct connect phones, ID verification,
20 and credit/debit card facilities;
- 21 2. SDG&E should install a payment drop-box within walking distance of any closed or
22 downgraded branch office that is not within half a mile of an APL; and
- 23 3. A six-month moratorium on non-payment shut-offs should be imposed for customers
24 whose nearest branch office is closed or downgraded to provide ample time for
25 customers to identify and arrange access to alternative payment locations.

26
27 First and foremost, SDG&E is not aware of the Commission requiring any utility to take
28 the steps proposed by UCAN, and the Commission should not adopt them now.

²⁴⁷ UCAN testimony, p. 94, lines 12-16.

²⁴⁸ UCAN testimony, p. 94-95, beginning on line 20.

1 Second, UCAN's recommendations would reduce the savings SDG&E would be able to
2 pass onto its customers.

3 Finally, each recommendation is unreasonable on its own merit as described below.

4 1. Adding direct phones, POS ID, and credit/debit cards at APLs in the vicinity of
5 the Oceanside, Downtown, and National City Branch Office is not always an option. SDG&E
6 meets with its APLs annually to discuss the possibility of offering POS ID. While we currently
7 have a high population of APLs who perform POS ID, we continue to look for new
8 opportunities. As an example, SDG&E recently secured an APL within walking distance of its
9 Downtown Office that performs POS ID.

10 Regarding direct connect phones, we feel we have a sufficient number of APLs that have
11 a courtesy phone. This is an ongoing expense that is not justified. Furthermore, almost all
12 customers have a phone or access to a phone. This service was started prior to the expansive
13 growth of cell phones and is becoming less necessary. As stated earlier, PPIC reported, "nearly
14 all Californians (92%) say they have a cell phone..."²⁴⁹

15 Regarding credit/debit cards, it seems excessive to accept credit and debit cards at APLs
16 when we don't accept them at our Branch Offices. SDG&E customers who wish to make credit
17 and debit card payments may do so using SDG&E's third party vendor BillMatrix, just as they
18 do today.

19 2. Installing a payment drop-box within walking distance of the three offices where
20 an APL is not within half a mile is not necessary. The Downtown Branch Office now has an
21 APL within half a mile and the National City Branch Office has two APLs within half a mile
22 (one being right next door).²⁵⁰ For the Oceanside office, I have established that 7 out of 10
23 customers pay at an APL rather than the Oceanside office;²⁵¹ thus, putting in a drop box for so
24 few customers is not necessary and provides little value to customers. Drop boxes in a public
25 area cannot accept cash (for safety reasons).

26 3. Placing a six-month moratorium on disconnections is pointless when there are
27 many options for customers to avoid disconnection. Customers can make a payment at any of
28 SDG&E's current 64 APL locations, any Branch Office, can pay online, can pay through the

²⁴⁹ PPIC: "Californians & Information," June 2013.

²⁵⁰ See Table BMB-11 in Section III.A.1.c of my rebuttal testimony.

²⁵¹ See Table BMB-8 in Section III.A.1.c of my rebuttal testimony.

1 IVR, etc. Furthermore, as stated in my direct testimony,²⁵² SDG&E will be implementing an
2 extensive communication plan to notify affected customers of the closures well in advance.
3 Communications include distributing multi-language notices, newspaper ads, direct mail, flyers,
4 Branch Office signage, notices on sdge.com, and meeting with local agencies and officials.

5 The Commission should not only reject UCAN's assertion that SDG&E customers will
6 be unnecessarily inconvenienced, but the Commission should also reject the needless steps
7 UCAN proposes SDG&E take if the office closures are approved.

9 C. SDCAN

10 1. Customer Service Expenditures and Policies

11 a. Customer Service Transactions on the Internet

12
13 **SDCAN misrepresents SDG&E's Customer Service operational efficiencies**
14 **activities.**

15
16 SDCAN states the following:

17
18 "SDG&E's lackluster efforts to find greater operational efficiencies and reduce its costs
19 cannot be tolerated by this Commission."²⁵³

20
21 SDG&E disagrees with SDCAN's assertion that Customer Service has been "lackluster"
22 in its efforts around greater operational efficiencies. In fact, my direct testimony sponsors almost
23 \$3 million of cost efficiencies within the Customer Service organization based on operational
24 efficiencies and additional self-service enhancements. These activities include items such as
25 streamlining AMO's field order process to reduce duplicate field orders, automating back office
26 billing processes for identifying consumption on inactive meters, optimizing staffing in both the
27 CCC and Branch Offices, reduced CCC call volumes resulting from self-service enhancements
28 in the IVR, and reductions in call handling time resulting from a new web-based desktop for the

²⁵² Exhibit SDG&E-14, p. BMB-48, starting on line 11 to page BMB-49.

²⁵³ SDCAN testimony, p. 18.

1 CCC. (See Appendix C, Supplemental Tables, Attachment C.1) The Commission should ignore
2 this claim as meritless.

3
4 **SDCAN incorrectly implies that SDG&E was critiqued in its TY 2012 GRC**
5 **decision.**

6
7 SDCAN states the following:

8
9 “In the 2012TY GRC, SDG&E was critiqued for its failure to adopt new Internet-based
10 services for its customers.”²⁵⁴

11
12 SDCAN may have critiqued SDG&E for a failure to adopt new Internet-based services
13 for its customers, however the Commission did not. In fact, the Commission stated, “...SDG&E
14 did provide information about its current Internet-based services for online transactions and the
15 initiatives it is taking in offering such services. SDG&E also recognizes that some customers
16 prefer to utilize Internet-based and social media services, while other customer segments
17 continue to utilize the existing call centers and branch offices.”²⁵⁵ The Commission did state,
18 “SDG&E is directed to provide in its next GRC filing a description of all of its internet-related
19 and social media functions that are available to its customers or that it is planning, the reasons for
20 providing those functions and their cost effectiveness, and how the call centers have been or will
21 be integrated or utilized to provide those functions. The Commission will examine in SDG&E’s
22 next GRC application whether SDG&E should be doing more in these areas, or if it has achieved
23 an appropriate balance in providing its customers with a variety of tools and information.”²⁵⁶
24 This information was provided in Appendix A of my direct testimony.²⁵⁷
25

²⁵⁴ SDCAN testimony, p. 19.

²⁵⁵ D.13-05-010 P. 472.

²⁵⁶ D.13-05-010 P. 473.

²⁵⁷ Exhibit SDG&E-14, pp. BMB-A-1 to A-6.

1 **SDCAN incorrectly implies that SDG&E has not transformed its Call Center to a**
2 **Contact Center.**

3
4 SDCAN states the following:

5
6 “In testimony filed at that time, Mr. Shames exhorted SDG&E to begin transforming its
7 ‘call center’ into a ‘contact center’ and begin developing a plan to utilize the efficiencies
8 of the Web to improve the customer experience while gaining operational
9 efficiencies.”²⁵⁸

10
11 SDG&E disagrees with SDCAN’s assertion that SDG&E has not transformed its “call
12 center” into a “contact center.” To accomplish this transformation, SDG&E has focused on
13 people, process, technology, and our customers. SDG&E has transformed our Customer Service
14 Representatives (CSR) in our CCC to Energy Services Specialists (ESS). This change from CSR
15 to ESS is far beyond a simple position title, but a recognition that the overall role of our
16 employees and customers’ expectations have changed. ESS assist and advise customers on
17 transactions, energy management programs, solutions, and optional services that will meet
18 individual customer needs, far beyond the traditional role of a CSR completing simple
19 transactions or responding to routine inquiries. This transformation has increased the traditional
20 ESS skills to include electric vehicles, net energy metering, optional rates, demand response
21 programs, complex bill analysis, etc.

22 SDG&E offers several channels for customer contacts beyond traditional phone calls.
23 SDG&E serves customers in their channel of preference, to include live chat, e-mail, and social
24 media (Twitter). Expansion of the telephone channel includes specialized service to our business
25 customers staffed with ESS skilled in serving a business customer’s unique needs.

26 Adoption of self-service channels such as IVR and the web for routine transactions have
27 allowed for efficiencies to be gained in service transactions therefore positioning the ESS to
28 engage with customers on more advanced discussions about energy use and optional
29 services. Improved technology and tools in the CCC have enabled ESS with ease of access to
30 customer data, energy use, and optional solutions enrollment. SDG&E’s Smart Energy Advisor

²⁵⁸ SDCAN testimony, pp. 19-20.

1 (SEAd) project (Project #13009) described in my direct testimony²⁵⁹ was an important step
2 forward by providing a unified, process centric web-based desktop for the CCC. This project
3 allowed for additional features and technical capabilities including telephony integration,
4 customer search, verification, customer relationship overview, and customer wrap up functions.
5 This project provided for an upgrade to the online help systems that the ESS use to research
6 information and procedures to assist customers. The efficiencies gained by this project and
7 SEAd phase 2 (Project #14017) are projected to achieve a 13 second reduction in average handle
8 time (AHT) for the ESSs resulting in an annual savings of over \$350,000. In addition, SDG&E
9 has implemented its Customer Analytics System (CAS – project #13013). The CAS system
10 centralizes customer data obtained from multiple data sources within the company. CAS
11 analyzes this data to create a Next Best Option. The Next Best Option evaluates relevant
12 information about customers and compares that to the programs and services offered by SDG&E.
13 This information is then used to inform the ESS of the most relevant programs and services for a
14 customer who contacts the CCC.

15
16 **SDCAN claims SDG&E’s TY 2016 forecast does not include efficiencies from web-**
17 **based services.**

18
19 SDCAN states the following:

20
21 “Since then, while the company has made a number of web-based services available, its
22 application does not reflect the efficiencies created by these web-based services.”²⁶⁰

23
24 Contrary to SDCAN’s assertion, SDG&E’s forecast does in fact include savings from
25 web-based services and other self-service enhancements. SDG&E used a zero-based forecast
26 with BY 2013 adjusted-recorded expenses as a starting point for activity levels. The BY 2013
27 already represents \$556,000 of self-service reductions from 2009-2013 (Table BMB-25). These
28 self-service reductions were a combination of both web and IVR efficiencies implemented as
29 part of the Intelligent Customer Experience (ICE) – Self-Service project. This project expanded

²⁵⁹ Exhibit SDG&E-14, p. BMB-135, beginning on line 6 to BMB-136.

²⁶⁰ SDCAN testimony, p. 20.

1 web-based service offerings to include turn-on, turn-off and changeover of utility services,
 2 ordering appliance servicing, and establishing or changing payment arrangements online similar
 3 to the IVR system.

4 **TABLE BMB-25**
 5 **CCC Operations Historical Self-Service Savings**

Year	2009	2010	2011	2012	2013	Total
ESS Calls	2,436,338	2,353,875	2,242,137	2,127,497	2,066,645	-
Annual ESS Call Reductions	0	82,463	111,738	114,640	60,852	-
IVR & Web Transactions	409,632	577,948	564,392	585,286	707,297	-
Annual IVR & Web Transaction Increases	0	168,316	-13,556	20,894	122,011	-
Avoided Calls due to IVR & Web self-service	0	82,463	0	20,894	60,852	164,209
FTE saving from IVR & Web self-service (14,250 calls per FTE)	0	5.8	0.0	1.5	4.3	11.5
Savings shown in (\$000) - \$48,250 per FTE	0	\$279	\$0	\$71	\$206	\$556

6
 7
 8 In addition to the embedded reductions already included in the BY 2013 adjusted-
 9 recorded expenses, my workpapers show a 57,000 ESS call reduction due to the 2014 IVR
 10 enhancement project (#14023)²⁶¹ resulting in savings of almost \$200,000 per year (Table BMB-
 11 26). In addition, my workpapers show an average handle time (AHT) reduction of 13 seconds
 12 per ESS call due to the two SEAd projects (#13009 an #14017)²⁶² resulting in savings of over
 13 \$350,000 per year. These and other CCC enhancements and efficiencies gains have resulted in
 14 \$736,000 (Table BMB-26) of reductions netting to a TY 2016 forecast of \$8.813 million for
 15 CCC Operations which is \$375,000 (4.3%) lower that its BY 2013 adjusted-recorded expense of
 16 \$9.188 million.
 17

²⁶¹ Exhibit SDG&E-14-WP-R, p. 103.

²⁶² Exhibit SDG&E-14-WP-R, p. 103.

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TABLE BMB-26
CCC Operational Efficiencies

CCC Operations - Efficiencies	TY 2016 – 2013 Change (\$000)			
	Labor	Non-Labor	Total	FTEs
Staffing Increase and Reduction in Overtime Pay	(\$46)		(\$46)	3.6
Change in Operating Hours	(\$145)		(\$145)	(3.0)
Capital Project Impacts – IVR 2014 Capital Project #14023. 57,000 reduced ESS calls	(\$193)		(\$193)	(4.0)
Capital Project Impacts – SEAd Phase 1 Capital Project #13009. 8 second reduced average handle time for ESS.	(\$217)		(\$217)	(4.5)
Capital Project Impacts – SEAd Phase 2 Capital Project #14017. 5 second reduced average handle time for ESS.	(\$135)		(\$135)	(2.8)
Total TY 2016 Impact	(\$736)		(\$736)	(10.7)

SDG&E did not forecast an increase in the web and mobile self-service channels and only forecasted an increase in the IVR self-service channel based on the 2014 IVR enhancement capital project (#14023). SDG&E took this approach because historical experience shows that implementing new self-service options cause an increase in the respective self-service channel, but that increase stabilizes and does not continue to increase self-service utilization until additional self-service enhancements are performed. Table BMB-27 summarizes the self-service rate by IVR and web and the corresponding projects that impacted the historical self-service rates.

1 **TABLE BMB-27**

2 **CCC 2009-2014 Self-Service Rate by IVR and Web**

Year	IVR Self Service	Web Self Service	IVR & Web Self Service	Self-Service (SS) Projects
2009	14.29%	0.11%	14.39%	2009 - 2010 IVR SS Increase: In June 2009, the IVR was upgraded to provide added speech recognition and call routing tracking. 2009 - 2010 Web SS Increase: In September 2009, the web was updated to include payment arrangement transactions
2010	19.28%	0.44%	19.71%	
2011	18.62%	1.49%	20.11%	2011 - 2012 Web SS Increase: In September 2011, the web was updated to include appliance service order transactions
2012	19.23%	2.35%	21.58%	
2013	19.32%	6.18%	25.50%	2012 - 2013 Web SS Increase: In January 2013, the web was updated to include turn on/off service order transactions
2014	23.70%	6.69%	30.39%	2013 - 2014 IVR SS Increase: In July 2014, the IVR was updated to include streamlined and standardized menu options, deferred and streamlined authentication, and deferred tailored treatment. In November of 2014, the IVR was updated to shorten the gas appliance service orders process and to improve language clarity.

3
4
5 With the exception of the 2014 IVR project, SDG&E is not proposing any additional self-
6 service enhancements that would directly impact the contact volume in the CCC. This is largely
7 due to the primary “traditional” self-service functions having already been automated. As stated
8 in my direct testimony:

9 “Today, customers can perform many of the most requested transactions 24/7 on both the
10 web and IVR. These functions include:

- 11 - Start, Stop, and Transfer Service
- 12 - Bill Payments
- 13 - Payment Arrangements and Extensions
- 14 - Gas Appliance Checks
- 15 - Report an Outage”²⁶³

16 While SDG&E is not proposing any additional “traditional” self-service enhancements
17 (with the exception of the 2014 IVR Enhancement Project), SDG&E has implemented and is
18 proposing the implementation of several web and app based projects that will improve the
19 customer experience and meet the customers’ expectations of SDG&E. The projects include
20 enhancements to SDG&E’s Mobile App, sdge.com, and My Account and are discussed in the
21 following section of my rebuttal testimony. These projects are focused on meeting our
22 customers’ expectations of the services SDG&E should be providing and not specifically

²⁶³ Exhibit SDG&E-14, p. BMB-4, lines 13-20.

1 targeted at reducing operational costs. When SDG&E does implement new programs or
2 transactions for customers (like offering new rate options for residential and small business
3 customers as part of the Smart Pricing Program), self-service options are immediately available
4 with the new offering and therefore does not offset direct operational costs but rather avoids a
5 portion of upward cost pressure these new programs or transactions would otherwise cause the
6 operations organizations.

7
8 **SDCAN claims SDG&E is not adopting innovative technologies.**

9
10 SDCAN states the following:

11
12 “...it appears that the government is sprinting ahead of SDG&E in the adoption and
13 utilization of innovative technologies and online channels to improve the customer
14 service experience at lower costs.”²⁶⁴

15
16 SDCAN makes a bold statement comparing SDG&E with the Federal Government,
17 especially with its several noteworthy technology failures not the least of which was the initial
18 launch of HealthCare.gov.²⁶⁵

19 SDCAN’s odd choice of a “role model” aside, SDG&E disagrees with SDCAN’s
20 assertions that SDG&E is not adopting innovative technologies. SDG&E is constantly
21 upgrading and improving its digital assets to improve the customer experience. In fact, SDG&E
22 regularly receives awards and mentions in the media for its innovative approach to technologies.
23 Just last year, PA Consulting Group also awarded SDG&E for Outstanding Customer
24 Engagement. The award recognizes SDG&E’s excellence in engaging with their customers by
25 providing real-time access to energy information. SDG&E was applauded for new services such
26 as the utility’s mobile app, upgrades to the online outage map to help customers know when
27 there is a planned or unplanned power outage in their area so they can plan ahead, and use of

²⁶⁴ SDCAN testimony, p. 21.

²⁶⁵ <http://www.bloomberg.com/bw/articles/2013-10-16/open-source-everything-the-moral-of-the-healthcare-dot-gov-debacle>.

1 social media to connect with customers.”²⁶⁶ In May of 2015, SDG&E was named the highest
2 ranked West Combination Utility in the Product Experience category at part of the Market
3 Strategies (“MSI”) Utility Residential Trusted Brand & Customer Engagement Study. Key
4 contributors to high standing includes the high usage of electronic and technology services, good
5 understanding of the design/features of our products/services as well as the fact that our
6 products/services are easy to use and perform as promised. In the study, product experience is
7 the component that provides the most scoring advantage to customer engagement (see Appendix
8 E).

9 A few examples of SDG&E adopting innovative technologies include:

10
11 Mobile App – in BY 2013 we successfully redesigned and launched the mobile app. We
12 added a new look and feel, increased functionality, and provided a more responsive and scalable
13 framework. Shortly after this release, SDG&E was ranked in the top 3 among 50 different
14 utilities for its mobile app.²⁶⁷ SDG&E has also received positive customer feedback and
15 recognition in response to these enhancements. Picture BMB-1 shows the mobile app with the
16 following features:

- 17 • Responsive design
 - 18 • Energy usage display
 - 19 • Report an outage feature
 - 20 • CARE application
 - 21 • Social channel integration
 - 22 • Carousel to promote specific items and services
 - 23 • Monitor feedback on iTunes and Google Play for updates
 - 24 • Outage map to show both planned and unplanned outages
 - 25 • Energy calculator
- 26

²⁶⁶ <http://www.greentechmedia.com/industry/read/sdg-e-awarded-for-best-in-the-nation-reliability-and-customer-354449>

²⁶⁷ <http://www.broadwayworld.com/bwwgeeks/article/Benchmark-Reveals-Top-50-US-Utilities-Leveraging-Social-Media-and-Mobile-Apps-To-Improve-Smart-Grid-Benefits-20140407#mQ4OYmJZfz0gph7b.99>

1

PICTURE BMB-1



2

3

4 sdge.com – sdge.com has been enhanced to offer customers more features, languages,
5 and accessibility. These enhancements include the following:

6

7

8

9

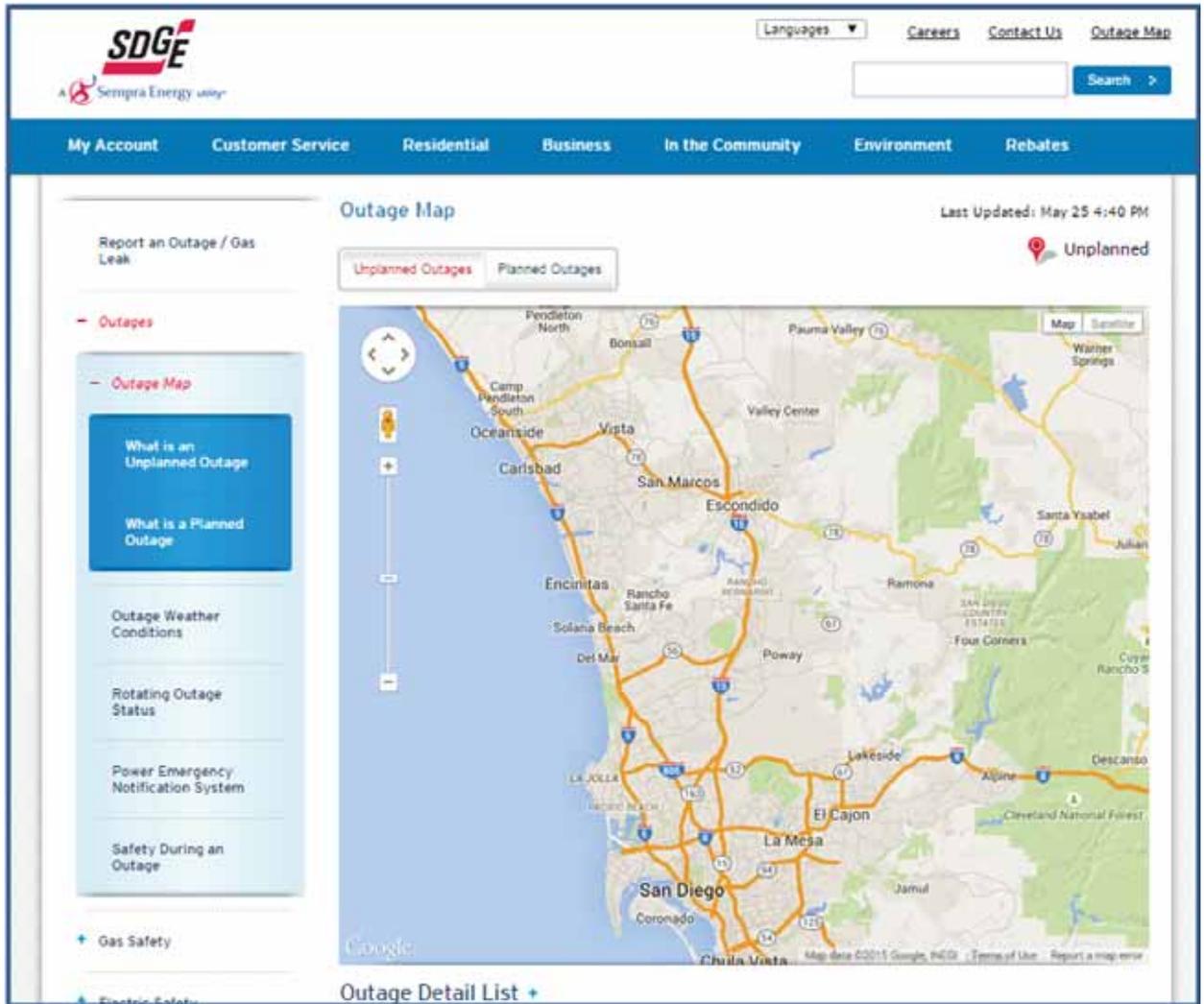
10

11

12

- CARE application online form
- Outage Map upgrades and the addition of planned outages (Picture BMB-2)
- Multiple Languages (Spanish, Vietnamese and Chinese FULL versions of the site)
- Accessible SDGE.com to help our customers with visual impairments
- Live Chat
- Videos/YouTube integration

PICTURE BMB-2



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My Account – SDG&E continues to enhance and add additional functionality to its My Account portal. Several capital projects in my direct testimony are specifically targeted at adding more value to customers and improving the overall customer experience. These include the following:

- SDG&E My Account Accessibility (Project #12051) - The purpose of the SDG&E My Account Accessibility Project is to update the customer-facing My Account portal site to comply with TY 2008 GRC Memorandum of Understanding (“MOU”) with the Disability Rights Advocates while improving usability and upgrading the portal technology platform. Pages will be easier to read and customers who sign up can view their SDG&E bill, schedule online payments, manage service requests, view

1 energy charts, and use analysis tools. New personalization will present at-a-glance
2 balance and bill payment information, and an improved tailored account summary.
3 The implementation of responsive design will create a seamless web experience with
4 the same look-and-feel across mobile devices (such as mobile smartphones and
5 tablets) and other company sites (such as sdge.com), and will provide greater access
6 to My Account for customers who may have barriers to technology. Pictures BMB-3
7 and BMB-4 below provide examples of the new My Account and how it could appear
8 on different device types.
9
10

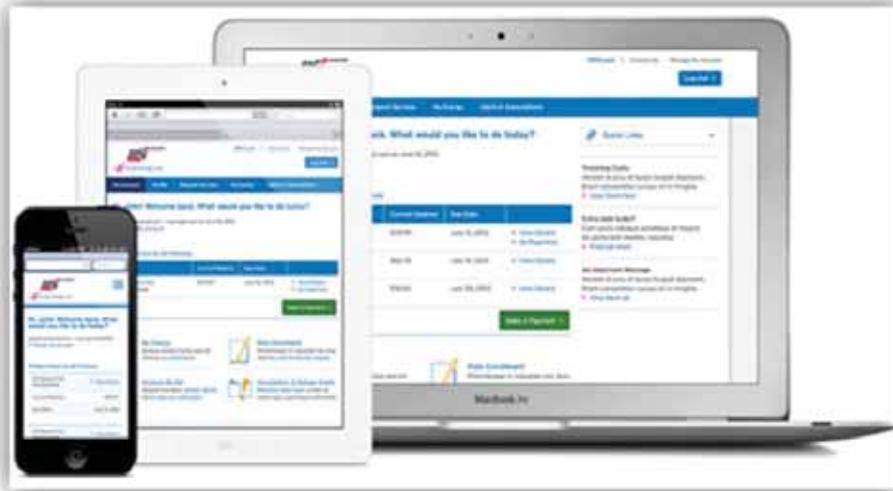
PICTURE BMB-3



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12

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PICTURE BMB-4



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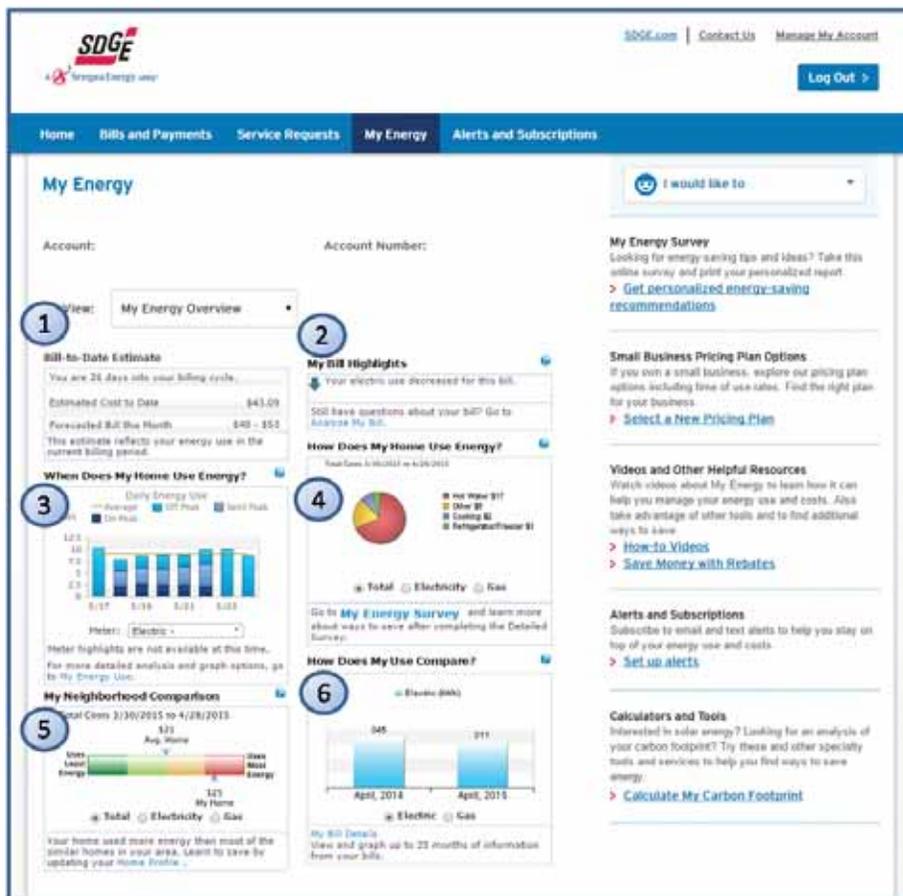
20

21

- C&I Business Portal (Project #14015) - The purpose of the C&I Business Portal is to address the specific needs of the medium and large commercial and industrial (C&I) customers. This portal will be a centralized location that provides the Commercial & Industrial customers with tools that support energy analysis from a cost and consumption level, event management, rate eligibility and enrollment, bill payment, benchmarking and energy efficiency. Across those functions, additional capabilities will be developed to allow for role based access and complex analysis such as:
 1. Business level C&I Customer Registration into My Account, allowing access to business-level related functions supporting C&I tools;
 2. Aggregation and disaggregation of accounts for multi-account customers;
 3. Management of complex (Many-to-Many) relationships between master users and delegated users for selected business functions;
 4. Customer Managed Contact Management at the user level; and
 5. Subscription/Alerts.
- My Energy (developed as part of the Smart Peak Pricing Project #10872) – The My Energy application empowers customers with tools to better understand, monitor, and manage their energy use. My Energy consists of the following functions (shown in Picture BMB-5).

1. Bill-to-Date Estimate – quick view of customer’s cost-to-date and forecasted bill for the month;
2. My Bill Highlights – items that may cause a customer’s bill to change;
3. When Does My Home/Business Use Energy? - monitor customer’s energy use by the hour or day using these energy charts;
4. How Does My Home/Business Use Energy? - provide information about customer’s home or business energy use habits;
5. My Neighborhood Comparison – shows how a customer’s home compares to other similar homes; and
6. How Does My Use Compare? – shows energy use compared to the same time period last year.

PICTURE BMB-5



- 1 • Goals and Alerts (developed as part of the Smart Peak Pricing Project #10872) – In
2 late BY 2013, SDG&E implemented its preference center where customers can enroll
3 for event and alert notifications. Customers enroll through SDG&E's My Account
4 website and establish the threshold for each notification and how they would like the
5 notification to be communicated. The following alerts are available through email or
6 text:
- 7 1. Bill-to-Date/Bill Forecast - customers will receive an alert when their estimated
8 bill reaches a certain amount;
 - 9 2. Energy Use Summary - customers will receive an alert when their estimated
10 energy usage (kWh or therms) reaches a certain amount;
 - 11 3. Tiered Alert - customers will receive an alert when they reach a new tier;
 - 12 4. Event Notification - customers will receive an alert when a Reduce Your Use
13 ("RYU") event is called (also available via our outbound dialer); and
 - 14 5. A Weekly Energy Use Summary Email is also available - the email contains the
15 customer's current bill-to-date and bill forecast information along with an energy
16 graph showing their last seven days of electric energy use (see Picture BMB-6).
- 17

PICTURE BMB-6



2

3

- Rate Comparisons and Rate Enrollment (developed as part of the Smart Peak Pricing Project #10872) - The rate comparison tool provides cost and savings estimates for eligible rates based on currently approved prices (rates) and a customer's past 12 months of electricity use. The rate enrollment tool enables a customer to select an available rate option and complete enrollment online. The tool is currently available for most residential and small business customers. The CPP-D project (#13021) will enhance the functionality to include most medium and large business customers. Picture BMB-7 displays the rate comparison screen where a customer can view their eligible rates and a comparison of estimated annual costs for each rate. A customer may customize their analysis with responses to various "what if" scenarios for saving energy (Picture BMB-8). The system will recalculate each rate based on the information provided by the customer. A detailed summary of each rate option

15

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(Picture BMB-9) along with a monthly comparison (Picture BMB-10) of each rate is also available to customers.

PICTURE BMB-7

The screenshot displays the SDGE website interface for a customer's pricing plan. At the top, the SDGE logo and navigation links (SDGE.com, Contact Us, Manage My Account, Log Out) are visible. The main navigation bar includes Home, Bills and Payments, Service Requests, My Energy, Alerts and Subscriptions, and Account Assist. The 'My Pricing Plan' section is the primary focus, showing the user's current plan (Standard (DR)) with an estimated cost of \$6,479 per year. Below this, there are three 'Available Pricing Plans' with their respective estimated costs and savings:

- Time of Use Plus (TOU-DR-P):** Estimated cost per year of \$6,116, with an estimated savings of \$363 per year. The description notes that electricity costs are less year-round except on Reduce Your Use days when a higher price is charged.
- Time of Use (TOU-DR):** Estimated cost per year of \$6,252, with an estimated savings of \$227 per year. The description states that price varies and is eligible for Reduce your Use Reward credits.
- Another Time of Use (TOU-DR):** Estimated cost per year of \$227, with an estimated savings of \$227 per year. The description notes that electricity costs less before 11am and after 6pm.

Each alternative plan includes an 'Enroll in This Plan' button and a 'View Plan Details' link. A 'Download Pricing Plan Report (PDF)' link is also present. The page includes several informational sections: 'Understanding Our Plans' explaining peak/off-peak pricing, 'Improve Your Pricing Plan Estimates' with an 'Energy Use Questionnaire' button, and 'Check Your Energy Usage' with a 'See My Energy Use' link. A footer section titled 'Other Ways To Enroll' provides a phone number (800) 411-7343 and a 'Download PDF Forms' link. A detailed disclaimer at the bottom explains that estimates may vary based on the number of Reduce Your Use days called and other factors.

4

1

PICTURE BMB-8

Improve Your Pricing Plan Estimates
Answer a few questions about ways to save energy and update your estimates.

Can you Minimize Your Energy Use?

Overall
overall electricity usage

No Some Yes

Weekdays
11am to 6pm during summer
5pm to 8 pm during winter

No Some Yes

Reduce Your Use ^{TR} Days
11am to 6pm on specific days

No Some Yes

When the demand for energy is high, Reduce Your Use ^{TR} days could be called (average 3 days per year).

[Close](#) [Submit Answers >](#)

2

3

PICTURE BMB-9

Compare Plans [Download Pricing Plan Report \(PDF\)](#)

Choose Plans

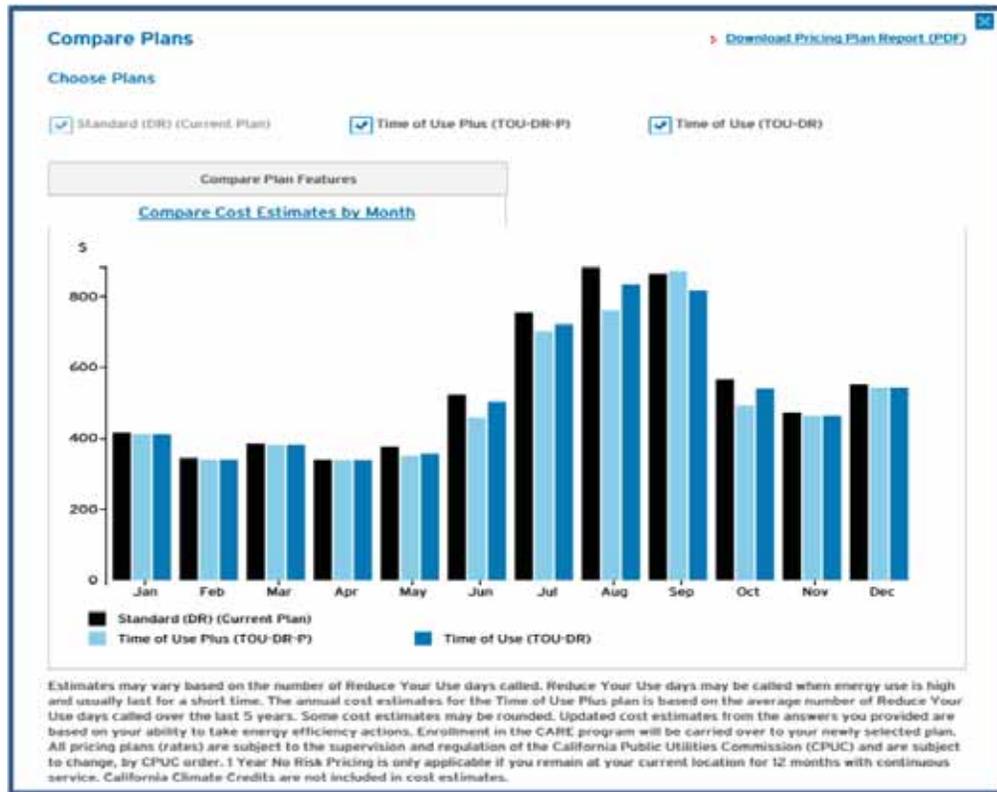
Standard (DR) (Current Plan) Time of Use Plus (TOU-DR-P) Time of Use (TOU-DR)

Standard (DR)	Time of Use Plus (TOU-DR-P)	Time of Use (TOU-DR)
Your Current Plan	Enroll in This Plan >	Enroll in This Plan >
\$6,479 Estimated cost per year	\$6,716 Estimated cost per year	\$6,252 Estimated cost per year
N/A Estimated savings per year	\$363 Estimated savings per year	\$227 Estimated savings per year
1 Year Commitment ⓘ 1 Year No Risk Pricing N/A	1 Year Commitment ⓘ 1 Year No Risk Pricing ⓘ	1 Year Commitment ⓘ 1 Year No Risk Pricing N/A
Reduce Your Use Rewards Days ⓘ	Reduce Your Use Days ⓘ	Reduce Your Use Rewards Days ⓘ
Details The cost per kWh is based on electricity use levels or tiers. As you use more electricity, you will cross into the higher cost tiers.	Details Electricity prices change based on the time of day. If you can lower your use during Reduce Your Use days, you could save even more. With 1 Year No Risk Pricing, if you didn't save on Time of Use Plus at the end of the first year, you'll get a bill credit for the difference.	Details Electricity prices change based on the time of day. Summer: Electricity costs less before 11am and after 6pm. Winter: Electricity costs less before 5pm and after 8pm. Eligible for Reduce Your Use Rewards.
Who This Plan is For You use electricity throughout the day. Your electricity use changes from day to day.	Who This Plan is For Electricity prices change based on the time of day. If you can lower your use during Reduce Your Use days, you could save even more. With 1 Year No Risk Pricing, if you didn't save on Time of Use Plus at the end of the first year, you'll get a bill credit for the difference.	Who This Plan is For Electricity prices change based on the time of day. Summer: Electricity costs less before 11am and after 6pm. Winter: Electricity costs less before 5pm and after 8pm. Eligible for Reduce Your Use Rewards.
Details The cost per kWh is based on electricity use levels or tiers. As you use more electricity, you will cross into the higher cost tiers.	Who This Plan is For You use the most electricity before 11am and after 6pm during the summer. You use the most electricity before 5pm and after 8pm during the winter. You can take big electricity-saving actions on Reduce Your Use days.	Who This Plan is For You use the most electricity before 11am and after 6pm during the summer. You use the most electricity before 5pm and after 8pm during the winter. Save enough energy on a Reduce Your Use Rewards day and earn a credit on your bill.

Estimates may vary based on the number of Reduce Your Use days called. Reduce Your Use days may be called when energy use is high and usually last for a short time. The annual cost estimates for the Time of Use Plus plan is based on the average number of Reduce Your Use days called over the last 5 years. Some cost estimates may be rounded. Updated cost estimates from the answers you provided are based on your ability to take energy efficiency actions. Enrollment in the CARE program will be carried over to your newly selected plan. All pricing plans (rates) are subject to the supervision and regulation of the California Public Utilities Commission (CPUC) and are subject to change, by CPUC order. 1 Year No Risk Pricing is only applicable if you remain at your current location for 12 months with continuous service. California Climate Credits are not included in cost estimates.

4

PICTURE BMB-10



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As noted earlier in my rebuttal testimony, these web tool enhancements were completed to meet customers' expectations of SDG&E services and not specifically directed at reducing operational costs. When SDG&E does implement new programs or transactions for customers (like offering new rate options for residential and small business customers as part of the Smart Pricing Program), self-service options are immediately available and therefore do not lower direct operational costs but rather avoid a portion of upward cost pressure these new programs or transactions would otherwise generate.

1 **SDCAN claims SDG&E’s did not provide information concerning SDG&E Internet-**
2 **related and social media functions.**

3
4 SDCAN states the following:

5
6 “No such description was forthcoming from the utility in the instant application. Instead,
7 SDG&E provided a list of social media and functionalities with no reference to cost-
8 effectiveness and savings.”²⁶⁸

9
10 SDG&E in fact did provide a comprehensive matrix in Appendix A of my direct
11 testimony “Web/Social Media and Customer Contact Center Interaction Matrix.” This matrix
12 clearly shows all of SDG&E social media and web-based activities, their benefits, and associated
13 impact on CCC operations. In many cases such as the social media channel, no cost-
14 effectiveness or savings are realized as these do not replace any existing functions or transactions
15 SDG&E performs with our customers. In fact, while these channels improve customer
16 experience by allowing SDG&E to communicate with customers via their preferred channel,
17 social media channels do not lower costs to serve our customers. Mobile and sdge.com customer
18 interactions also do not result in avoidance of transactions to our CCC. Online chat function also
19 does not reduce the cost to serve our customers. In fact, an ESS typing in a web chat session
20 with a customer will typically require more time, rather than less time than a telephony voice
21 conversation. All My Account enhancements have already been reflected in BY 2013 adjusted-
22 recorded expenses for the CCC (which accounted for a \$556,000 reduction).

23 SDCAN further asserts “Moreover, it does not address a number of the web based
24 initiatives that SDG&E implemented since 2012.”²⁶⁹

25 The only example that SDCAN provided was the chat function that was implemented in
26 BY 2013. As previously discussed, SDG&E did not provide any savings or efficiencies with this
27 functionality because ESS live chat capabilities do not save significant (if any) CSR time. In
28 fact, a CSR typing in a web chat session with a customer will typically require more time, rather
29 than less time than a telephony voice conversation.

²⁶⁸ SDCAN testimony, p. 22.

²⁶⁹ SDCAN testimony, p. 22.

1 **SDCAN questions why SDG&E did not discuss its CSR online customer helpdesk**
2 **tool.”**

3
4 SDCAN states the following:

5
6 “Additionally, SDG&E fails to mention its ‘CSR on-line customer helpdesk tool’ which
7 was a customer service web-based initiative introduced by SDG&E in 2011. It is an ‘...
8 implement online helpdesk support tools for CSRs which include ‘co-browsing’
9 capabilities, CSR and customer chat functionality, and call-back and/or other online
10 customer collaboration tools’ and was budgeted at over \$2 million.”²⁷⁰

11
12 It is unclear to why SDCAN is referencing SDG&E’s CSR On-line Help Desk tool. This
13 tool allows the ESS to co-browse a My Account session with a customer, assisting with
14 navigation or specific My Account applications. While this is a very useful tool for the ESS and
15 allows for an enhanced level of support for our customers, adding this service and capability in
16 2011 is not specifically relevant for TY 2016 GRC. Impacts to ESS call handle time are
17 embedded in BY 2013 adjusted-recorded expenses for CCC Operations.

18
19 SDCAN further states, “Nor does it mention any multi-channel integration.”²⁷¹

20
21 As previously discussed and shown in Picture BMB-4, SDG&E has multi-channel
22 integration between its sdge.com, My Account website, and Mobil App. In addition, SDG&E
23 also uses all of its communications channels in an integrated, systematic approach to successfully
24 engage key stakeholders, anytime and anywhere they may be located. All customer
25 communications are strategically integrated and coordinated, including digital, mass media and
26 communications activities as shown in Picture BMB-11. This picture represents how SDG&E
27 integrates its messages between sdge.com, Twitter, email (energynotes@home), and mobile to
28 help ensure it provides integrated communications in the channels preferred by our customers.

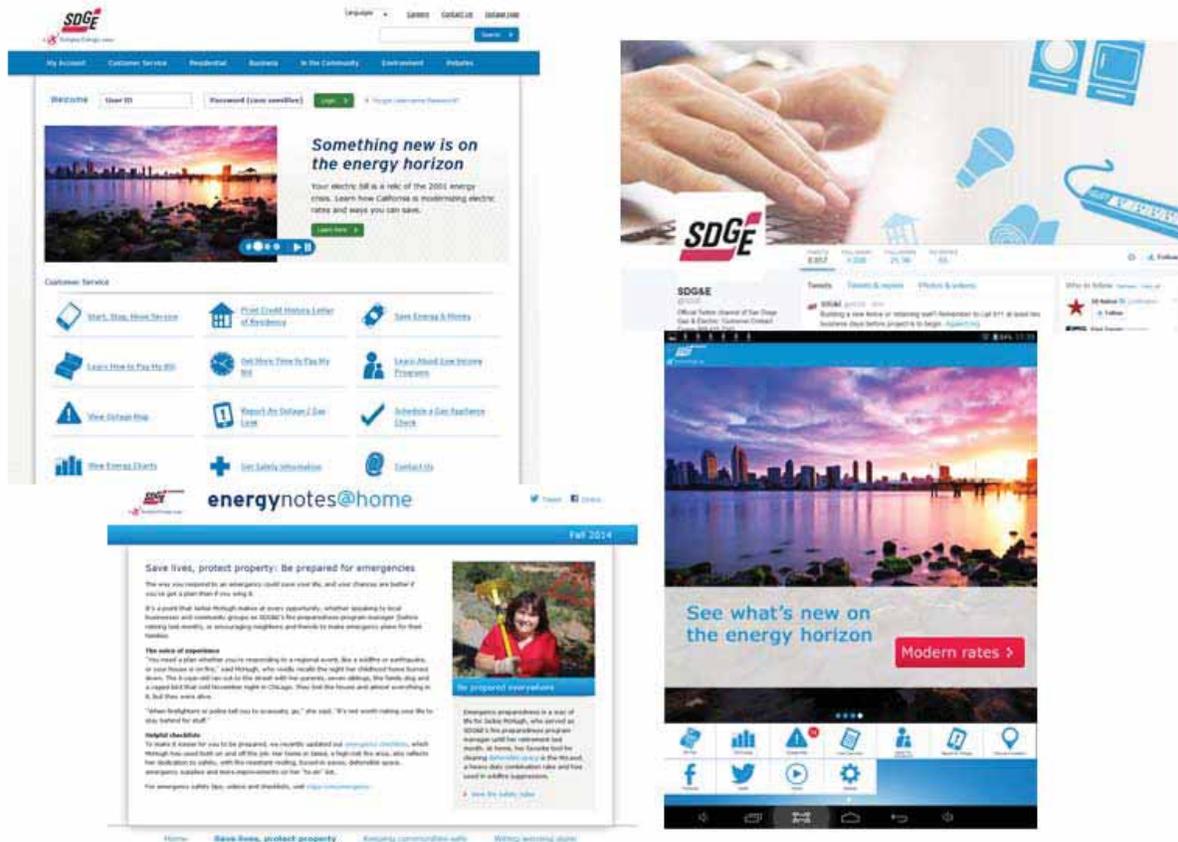
²⁷⁰ SDCAN testimony, p. 22.

²⁷¹ SDCAN testimony, p. 22.

1 Understanding that not all customers prefer digital channels, this type of integrated
2 communications would also include bill inserts.

3
4

PICTURE BMB-11



5
6

1 **SDCAN request the Commission to infer operational efficiencies.**

2
3 SDCAN states the following:

4
5 “Absent some clearer picture from SDG&E of utility-wide integration of web upgrades as
6 well as a vision for the efficiencies achievable through the upgrades, the Commission
7 should infer operational efficiencies.”²⁷²

8
9 SDCAN’s request that the Commission “should infer operational efficiencies” is not
10 based on facts. To the contrary, SDG&E has shown over \$556,000 of web and IVR efficiencies
11 embedded in its BY 2013 adjusted-recorded expenses and an additional \$736,000 of IVR and
12 ESS efficiencies in its TY 2016 forecast for the CCC. SDCAN does not identify any specific
13 operational efficiencies for this organization. Instead, SDCAN infers some additional “invisible”
14 efficiency but fails to give any specifics. To expand to all of the Customer Service organization,
15 SDG&E has included almost \$3 million in efficiencies (see Appendix C, Supplemental Tables,
16 Attachment C.1). As already discussed, most additional web-based features that SDG&E is
17 implementing are to perform new business transactions or expansion of low use transactions
18 (e.g., residential and small business customers’ rate options, since prior to the Smart Pricing
19 Project, residential and small business customers had few real rate options) that do not directly
20 result in reduced operational costs. Since self-service features are designed and incorporated
21 from the new program’s inception, these new transactions do not lower direct operational costs
22 but rather avoid a portion of upward cost pressure these new programs or transactions would
23 otherwise generate.

24

²⁷² SDCAN testimony, p. 23.

1 **SDCAN uses faulty ORA analysis to inaccurately conclude that SDG&E Customer**
2 **Operations has shown a decline in expenses.**

3
4 SDCAN asserts:

5
6 “ORA’s review of SDG&E’s Customer Services operations notes, anecdotally, SDG&E’s
7 adjusted-recorded expenses declined each year over the six year period (2009-2014).
8 SDG&E’s adjusted-recorded expenses declined by \$8.478 million between 2009 and
9 2014 from \$42.620 million in 2009 to \$34.142 million in 2014. Yet, rather than anticipate
10 a continued trend of cost savings, ORA accepts a Non-Shared Customer Service
11 Operations Expenses budget that exceeds SDG&E’s recorded 2014 expenditures of
12 \$34,142,000. It doesn’t note the reason for much of this decline nor does it even list call
13 volume trends for these departments.”²⁷³

14
15 Just like ORA, SDCAN has misrepresented historical expenses in SDG&E’s Customer
16 Service – Operations organization as declining but is even bolder in its analysis and tries to
17 imply that this false decline is attributable to call volume trends. As Table BMB-7 clearly
18 indicates, all (and more) of the \$8.5 million decrease between 2009 and 2014 is accounted for by
19 the elimination of the complete Meter Reading Department effective in 2012. In fact, the Meter
20 Reading Department 2009 recorded expenses of almost \$9.7 million were completely eliminated
21 by 2012. The Meter Reading Department was eliminated in its entirety because of Smart Meter
22 deployment. After adjustment for Meter Reading recorded expenses, Table BMB-7 shows that
23 Customer Services Operations actually experienced an increase in recorded expenses from 2009
24 to BY 2013 of almost \$2.7 million (\$32.9 million to \$35.6 million). While SDG&E continues to
25 look for efficiencies in its operational organization (including almost \$3 million in reductions in
26 its TY 2016 forecast), there are many upward pressures on operational organizations that the
27 Commission should not ignore. As stated in my direct testimony, there are many cost drivers
28 that impact Customer Operations and cause upward pressure on costs. These include, but are not
29 restricted to, (1) transition of AMO activities from the Advance Metering Infrastructure
30 Balancing Account into TY 2016 expenses, (2) additional billing of customers on interval data,

²⁷³ SDCAN testimony, p. 23.

1 (3) growth of Net Energy Metering, and (3) transition of Smart Pricing (SPP) activities from the
2 DPBA into TY 2016 expenses.

3
4 **SDCAN disputes SDG&E budget and call forecast for the CCC.**

5
6 SDCAN asserts the following:

7
8 “Yet, while SDG&E acknowledges that its call volume has dropped steadily since 2005,
9 it forecasts an increase in 2014 on the basis that customers will call about rate
10 changes.”²⁷⁴

11
12 SDCAN is inaccurate in its assertion that SDG&E forecasted an increase in call volume
13 in 2014 based on customers calling about rate changes. SDG&E has planned and is scheduled to
14 offer optional rates to residential customers in early 2015, defaulting small business customers to
15 time of use rates with a critical peak in late 2015, and anticipated adoption of rate reform in mid-
16 2015. SDG&E did not forecast any increase in call volume related to customers calling about
17 rate changes until TY 2016.²⁷⁵ The only forecasted increase in call volume in 2014 was related
18 to customer growth.²⁷⁶

19
20 SDCAN further states:

21
22 “SDG&E’s 2014 forecast is undermined by facts. For 2014, Mr. Baugh estimates a total
23 of 2,080,069 ESS calls. Yet, in response to an SDCAN data request, SDG&E concedes
24 that the 2014 number of ESS calls was 1,833,513 – a drop of over 10% from the previous
25 year. Moreover, SDG&E makes no mention of web-based efficiencies as it seeks
26 effectively the same budget for CCC Operations as it had enjoyed in the past.”²⁷⁷

27

²⁷⁴ SDCAN testimony, p. 23.

²⁷⁵ Exhibit SDG&E-14-WP-R p. 93.

²⁷⁶ Exhibit SDG&E-14-WP-R pp. 101-103.

²⁷⁷ SDCAN testimony, pp. 23 – 24.

1 First, as already stated, SDG&E's BY 2013 adjusted-recorded expenses already includes
2 \$556,000 of web and IVR self-service reductions from 2009 - 2013 (see Table BMB-25).
3 Second, SDG&E has included an additional \$736,000 (Table BMB-26) of reductions from IVR
4 enhancements and efficiencies gains netting to a TY 2016 forecast of \$8.813 million for CCC
5 Operations, which is \$375,000 (4.3%) lower than its BY 2013 adjusted-recorded expense of
6 \$9.188 million. Third, there are valid reasons for the reduction of 2014 call volumes that were
7 not fully anticipated when the original 2014 call volume was forecasted. The table that SDCAN
8 references in its testimony²⁷⁸ only reflects the impact in call volumes resulting from customer
9 growth and not the impacts of other cost drivers as discussed in my direct testimony and shown
10 in my workpapers.²⁷⁹ Table BMB-28 more accurately represents the full impact on call volumes
11 resulting from customer outreach and safety checks, new rate options and programs, CARE
12 enrollments, and IVR enhancements. In addition, 20,000 additional web and mobile transactions
13 were included in TY 2016 to account for self-service rate enrollments.²⁸⁰

14
15 **TABLE BMB-28**
16 **CCC Call Volumes**

	Year	ESS Calls	% of Total	IVR Calls	% of Total	Web & Mobile	% of Total	Email	% of Total	Chat	% of Total	Total Contacts
Actual	2009	2,436,338	81.65%	406,549	13.63%	3,083	0.10%	137,762	4.62%	0	0.00%	2,983,732
	2010	2,353,875	76.04%	565,140	18.26%	12,808	0.41%	163,718	5.29%	0	0.00%	3,095,541
	2011	2,242,137	75.62%	522,581	17.62%	41,811	1.41%	158,485	5.35%	0	0.00%	2,965,014
	2012	2,127,497	74.15%	521,666	18.18%	63,620	2.22%	156,330	5.45%	0	0.00%	2,869,113
	2013	2,066,645	72.76%	535,836	18.86%	171,461	6.04%	62,209	2.19%	4,295	0.15%	2,840,446
	2014	1,833,513	68.07%	624,353	23.18%	176,147	6.54%	50,711	1.88%	8,905	0.33%	2,693,629
Forecast	2014	2,065,819	72.26%	553,567	19.36%	172,575	6.04%	62,613	2.19%	4,323	0.15%	2,858,897
	2015	2,043,450	70.78%	601,601	20.84%	174,266	6.04%	63,227	2.19%	4,365	0.15%	2,886,909
	2016	2,185,721	71.46%	608,153	19.88%	196,362	6.42%	63,987	2.09%	4,418	0.14%	3,058,641

17
²⁷⁸ SDCAN testimony, p. 48.

²⁷⁹ Exhibit SDG&E-14-WP-R p. 103.

²⁸⁰ SDG&E estimated an additional 80,000 phone calls for New Rate Options and Programs (Exhibit SDG&E-14-WP-R p.103). While the call volume was accounted for in Table BMB-28, additional web transactions for the rate enrollment self-service transaction were mistakenly omitted. SDG&E is estimating 20,000 web transactions. The 20,000 web transactions were calculated based on the TOU enrollments presented in an informal data request response submitted to the Energy Division on 2/12/15. (See SDG&E response to Energy Division informal data request, Q4 in Appendix A, SDG&E Responses to Data Requests, Attachment A.9.) The 20,000 web transactions were calculated as the difference between the approximately 100,000 optional TOU enrollments and the 80,000 phone calls.

1 There were several factors that attributed to the 232,306 lower 2014 ESS call volume:

- 2 • 93,203 ESS calls moved to self-service. While SDG&E did project 14,250 ESS calls
3 moving to self-service in 2014 increasing to a total of 57,000 calls by TY 2016
4 resulting from the 2014 IVR project (#14023), the total volume of calls moving to
5 self-service in 2014 exceeded SDG&E's estimate.
- 6 • 59,119 fewer ESS Calls for appliance service orders. There were also 4,369 fewer
7 web-based appliance service orders in 2014.
- 8 • 76,442 fewer ESS calls for "unknown" reasons. This category is when a customer
9 declines to give a reason for their call in the IVR.

10 SDG&E does appear to have underestimated the impact of the IVR Enhancement Project
11 by approximately 36,203 calls which equates to 2.5 full-time employees or \$120,625.

12
13 **SDCAN provides no documentation or analysis to justify its proposed 10%**
14 **reduction of CCC estimated expenses.**

15
16 SDCAN proposes:

17
18 "SDCAN recommends that any increase should be rejected by the Commission. Instead,
19 the 10% imputed efficiency that the Commission deferred to apply in D. 13-05-010
20 should be applied in this proceeding."²⁸¹

21
22 Just as UCAN proposed in SDG&E's TY 2012 GRC, SDCAN is proposing a 10%
23 reduction in CCC estimated expenses but provides no analysis, discussion, or documentation for
24 this recommendation. SDCAN seems to ignore that SDG&E is already proposing a reduction of
25 \$736,000 from efficiencies (see Table BMB-26) which equates to 8% of the CCC Operations BY
26 2013 adjusted-recorded expense of \$9.188 million. For the CCC Support organization, the only
27 change SDG&E is requesting is \$73,000 for annual software maintenance fees for the SEAd
28 Phase 1 and Phase 2 capital projects.²⁸²

²⁸¹ SDCAN testimony, p. 24.

²⁸² Exhibit SDG&E-14 p. 58, lines 16-20.

1 In addition, SDCAN falsely assumes that CCC Support is impacted the same way that the
2 CCC Operations organization is from self-service increases. As ESS calls are transitioned to
3 self-service and new technologies are implemented, the remaining calls are actually more
4 complex and require a higher level of training, quality assurance, procedural updates, analytical
5 support, and software expenses that directly impact the CCC Support organization. Based on
6 SDCAN's lack of factual support and completely arbitrary calculation of a 10% reduction,
7 SDCAN's recommendation should be rejected.

8
9 **b. SDCAN Recommends New Web-Based Services**

10
11 **SDCAN asserts SDG&E only focuses on “what customers do.”**

12
13 SDCAN states:

14
15 “SDCAN asserts that customer experience is a combination of what consumers do, think,
16 and feel. Conversely, SDG&E seems to be focused on what customers do almost to the
17 exclusion of how its customers feel about the web upgrades.”²⁸³

18
19 SDG&E often tests its digital offerings before they are released to its customers. Tests
20 include focus groups, card sorting exercises, personal research, and one-on-one usability testing
21 where a customer sits at a computer, laptop and/or mobile device and tests the SDG&E's user
22 experience. SDG&E performs user testing to observe and solicit direct feedback on the user's
23 experience from the customer's (real) perspective. Testing not only allows the company to
24 observe what people actually do, but the customers will provide SDG&E with immediate
25 feedback (what they think and feel) as they interact with the website or app. SDG&E sees
26 testing as the best way to discover what features and functions work and what does not and
27 considerable insight to the WHY. Recent testing has been conducted on the SDGE.com
28 homepage “storefront”, My Account redesign, SDGE.com business section, rate enrollment
29 tools, and several other SDG&E applications.

30

²⁸³ SDCAN testimony, p. 26.

1 **SDCAN proposes using e-mail with artificial intelligence for customers to report**
2 **emergencies.**

3
4 SDCAN proposes:

5
6 “Currently SDG&E's web site states: ‘do not send us an e-mail if you have an
7 emergency.’ This is entirely wrong. In the 21st century, texts or e-mails should be the
8 most appropriate means of reporting an emergency.”²⁸⁴

9
10 SDG&E disagrees with SDCAN that texts or e-mails should be the primary means to
11 contact SDG&E when reporting an emergency. SDG&E is consistent with the Federal
12 Communications Commission’s recommendation concerning the reporting of emergencies...

13 “But if you are able to make a voice call to 911, and if it is safe to do so, you should always
14 make a voice call to 911.”²⁸⁵ Making a phone call is the fastest and most assured means to report
15 an emergency and receive immediate attention. Emergency calls are given priority routing to an
16 ESS and a live agent is available 24/7 to assist customers with these types of requests.

17
18 **SDCAN falsely finds SDG&E deficient of not having an interactive rate finder.**

19
20 SDCAN proposes:

21
22 “Currently, SDG&E’s website is deficient in the following manner:

- 23 • It has no means by which residential customers can easily discern the most
24 appropriate rate available for their usage
25 • It has no means by which customers can compare different rates.
26 • It has no means by which customers can backcast to compare how they would have
27 fared under different rates from which they could have selected.”²⁸⁶

28

284 SDCAN testimony, pp. 26-27.

285 <https://www.fcc.gov/guides/text-911-quick-facts-faqs>.

286 SDCAN testimony, p. 27.

1 SDCAN's assertion is false. As part of the Smart Pricing Program ("SPP"), an on-line
2 tool was launched for commercial customers in May 2014 and Residential customers in February
3 2015. This tool meets all of SDCAN's "deficiencies" by giving cost and savings estimates for
4 eligible rates based on currently approved prices (rates) and a customer's past 12 months of
5 electricity use. The rate enrollment tool enables a customer to select an available rate option and
6 complete enrollment online. This tool was discussed previously and examples are shown in
7 Pictures BMB-7, BMB-8, BMB-9, and BMB-10.

8
9 SDCAN further states:

10
11 "Rate finder would also reduce additional CSR time and it is already funded in the
12 Dynamic Pricing application process (A. 10-07-009) so it does not require any GRC-
13 based funding."²⁸⁷

14
15 SDCAN is partially correct that the implementation of the rate comparison tool was
16 funded through the Dynamic Pricing application but SDG&E is seeking ongoing support costs
17 for the tool (as directed by CPUC D.12-12-004 in SDG&E's Dynamic Pricing Application
18 (A.10-07-009) – see Section III.C.1.c under the heading "SDCAN incorrectly claims SDG&E is
19 double charging its customers and ignores a Commission order" for a full discussion on this
20 topic). In addition, SDG&E's forecast already incorporates the self-service impacts of the rate
21 comparison tool and only includes a portion of total contacts not supported by self-service.²⁸⁸

22
23 **SDCAN falsely assumes SDG&E does not plan to use surveys to obtain customer**
24 **feedback.**

25
26 SDCAN proposes:

27
28 "Customers like surveys and the feedback that surveys provide is useful to a provider
29 who is interested in improving service. This is a very low cost means of collecting useful

²⁸⁷ SDCAN testimony, p. 28.

²⁸⁸ Exhibit SDG&E-14-WP-R p. 103.

1 data and which customers often appreciate. Based upon SDG&E data responses
2 discussed above, the company has not looked into this functionality.”²⁸⁹

3
4 SDG&E agrees that gathering customer feedback via surveys offers great value in
5 improving service. SDG&E currently utilizes various forms of survey deployment methods,
6 including online surveys. We also agree that online surveys can be a low cost solution. SDG&E
7 evaluates survey deployment methods (i.e., online, phone, etc.) based on the intended target
8 customers and type of questions and analysis the research will include. For example, surveys
9 that will involve conjoint analysis are often best suited for an online survey. At times, a balance
10 between online and phone surveys is ideal within the same research study to assure we are
11 utilizing the approach that would warrant the best response rate and target the right type of
12 customer, dependent on the objectives. While online surveys do reduce the data collection
13 portion of a research study’s cost, the other components do not realize a reduction, such as the
14 survey design component, data and comment analysis, and reporting. SDG&E intends to offer
15 online surveys for the four surveys proposed in my direct testimony²⁹⁰ where appropriate.

16
17 **c. Double Charging SDG&E Customers**

18
19 **SDCAN incorrectly claims SDG&E is double charging its customers and ignores a**
20 **Commission order.**

21
22 Like ORA, SDCAN fails to understand the funding mechanism approved by the CPUC in
23 SDG&E’s Dynamic Pricing Application (A.10-07-009).

24 I explained in my direct testimony,²⁹¹ the SPP was established in 2010 to implement new
25 rate options, customer tools, and other provisions adopted by CPUC D.12-12-004 in SDG&E’s
26 Dynamic Pricing Application (A.10-07-009). Ordering Paragraph 16 of D.12-12-004 ordered
27 SDG&E to establish a Dynamic Pricing Balancing Account (“DPBA”) to record its costs related
28 to the implementation of the program. As described in my direct testimony, the CPUC
29 authorized and directed SDG&E to request funding for post-2015 operational costs as part of a

²⁸⁹ SDCAN testimony, p. 27.

²⁹⁰ Exhibit SDG&E-14, pp. BMB-87 to BMB-90.

²⁹¹ Exhibit SDG&E-14, BMB-23, beginning on line 3.

1 future GRC.²⁹² As such, SDG&E's TY 2016 GRC forecast includes the operational costs
2 necessary to support ongoing (post-2015) SPP expenses. Appendix C, Supplemental Tables,
3 Attachment C.2 shows the expenses that are already in rates which are now funded through 2015
4 in the DPBA and the ongoing SPP expenses forecasted for TY 2016. As stated above, the
5 Commission has explicitly ordered in D.12-12-004 that continued funding for SPP be included in
6 GRC rates. Therefore, the testimony of ORA and SDCAN should be ignored.

7
8 **D. TURN**

9 **a. Clothing and Other Promotional Gear**

10
11 **TURN arbitrarily reduces SDG&E's expenses for clothing and other promotional**
12 **gear.**

13
14 TURN states:

15
16 "...SDG&E spent \$752,000 on clothing and other gear containing the utilities' name and
17 logo (excluding uniforms, hard hats, etc.) in base year 2013 as shown in TURN-Sempra
18 DR 4-9. These types of expenses are largely promotional and image-building (giveaways
19 and other materials) and should be not be paid for by ratepayers."²⁹³

20
21 The Commission should reject TURN's proposal to reduce SDG&E's Customer Service
22 Operations, Information, and Technologies expenses by \$18,556.²⁹⁴ These types of expenses are
23 not for image-building or brand promotion. SDG&E provides promotional materials at
24 conferences, seminars, and community events to promote key messages such as safety, self-
25 service, and energy conservation. Clothing with the company name is used for customer events
26 to distinguish SDG&E employees and identify them as a company representative and
27 information resource. Table BMB-29 below summarizes in greater detail TURN's proposed
28 disallowance of expenses at the workgroup level. TURN's proposal should be rejected.

29

²⁹² CPUC D.12-12-004, pp. 16-17 and Ordering Paragraph 15.

²⁹³ TURN testimony, Marcus, p. 47.

²⁹⁴ TURN testimony, Marcus, pp. 47-48, Tables 15 and 17 respectively.

1 **TABLE BMB-29**

2 **Summary of BY 2013 Expenses for Clothing and other Gear**

Exhibit No.	Workpaper	Workpaper Description	Description	Total 2013
SDG&E-14	100000.000	Advanced Metering Operations	Clothing, and other promotional gear.	\$59
	100006.000	CCC Operations	Clothing, and other promotional gear.	\$2,982
	100008.000	Residential Customer Service	Clothing, and other promotional gear.	\$13,188
	100009.000	Commercial & Industrial Services	Clothing, and other promotional gear.	\$2,327
Total				\$18,556

3
4
5 **b. Tickets to Sporting and Cultural Events**

6
7 **TURN also arbitrarily reduces SDG&E's expenses for sporting and cultural events.**

8
9 TURN states:

10
11 "The Sempra utilities are spending \$165,000 on tickets to cultural and sporting events.
12 These costs are not necessary to provide utility service and should be removed."²⁹⁵

13
14 TURN contends that tickets to sporting and cultural events are costs that are not
15 necessary to provide utility service and should be removed.²⁹⁶

16 Use of sporting events and cultural tickets with customers is a very common business
17 practice across all industries to develop and maintain customer relationships and increase
18 customer participation in CPUC supported services. These include discussions on regulatory
19 matters, business development, tariff compliance and changes, etc. SDG&E maintains a
20 proactive presence with our commercial and industrial customers as they represent a significant
21 component of the customer base and help reduce the cost to serve all customers. Economic
22 development with business customers and growth in program participation benefits all customers
23 overall. Additionally, the Commission has historically approved the recovery of employee
24 recognition. It is one method to recognize and motivate employees for completion of projects to
25 improve system safety and reliability, employee safety, and improve customer service and

²⁹⁵ TURN testimony, Marcus, p. 46.

²⁹⁶ TURN testimony, Marcus, p. 46.

1 perceptions. This results in increased employee morale, productivity, and workplace
2 satisfaction.

3 Table BMB-30 below summarizes in greater detail TURN's proposed disallowance of
4 expenses for tickets to sporting and cultural events at the workgroup level.

5 These expenses were used specifically for the purposes of developing and strengthening
6 customer relationships as well as building program participation and employee recognition.
7 Therefore, TURN's proposal should be rejected.

8 **TABLE BMB-30**

9 **Summary of BY 2013 Expenses for Sporting Events**

Exhibit No.	Workpaper	Workpaper Description	Description	Total 2013
SDG&E-14	100006.000	CCC Operations	Tickets to sporting events.	\$629
	100008.000	Residential Customer Service	Tickets to sporting events.	\$600
	100009.000	Commercial & Industrial Services	Tickets to sporting events.	\$1,700
Total				\$2,929

10
11
12 **E. Joint Minority Parties ("JMP")**

13 **a. Target Hard-to-Reach Customers**

14
15 **JMP's recommendation that five percent of rate increases should be allocated for**
16 **marketing, outreach, and education to hard-to-reach customers is unsupported.**

17
18 JMP makes a recommendation to Sempra Utilities that at least five percent of any rate
19 increases over the three year GRC period be allocated for marketing, outreach and education
20 focused on those who are hit hardest by any rate increases.²⁹⁷ SDG&E agrees that customer
21 education, communications and outreach to low/moderate income and hard-to-reach customers is
22 a marketing challenge but disagrees with the JMP recommendation. The recommendation is
23 completely unsupported. If the recommendation is to be considered by the Commission the topic
24 should be examined in the Low Income Energy Efficiency ("LIEE") Proceeding or similar
25 proceeding.
26

²⁹⁷ JMP testimony, p. 13, lines 15-18.

1 **IV. REBUTTAL TO PARTIES' SHARED SERVICES O&M PROPOSALS**

2 **TABLE BMB-31**

3 **Comparison of SDG&E and Intervenors TY 2016 Estimated**
4 **Shared Services O&M Expenses**
5

SHARED O&M - Constant 2013 (\$000)			
	Base Year 2013	Test Year 2016	Change
SDG&E	\$976	\$979	\$3
ORA	\$976	\$979	\$3
UCAN	\$976	\$979	\$3
SDCAN	\$976	\$979	\$3
JMP	N/A	N/A	N/A

6
7 **A. ORA**

8 ORA finds SDG&E's TY 2016 forecast for its Customer Service Operations,
9 Information, and Technologies Shared Services as reasonable. ORA reviewed SDG&E's
10 testimony, workpapers, data request responses, and historical expense level for each workgroup
11 and the forecasts are reasonable.²⁹⁸ As such, the Commission should adopt SDG&E's forecast as
12 reasonable.

13
14 **B. UCAN, SDCAN, TURN, and JMP**

15 Although ORA specifically approves SDG&E's forecast for its shared services, UCAN,
16 SDCAN, TURN, and JMP do not take issue with SDG&E's TY 2016 forecast for its Customer
17 Service Operations, Information, and Technologies Shared Services. As such, the Commission
18 should adopt SDG&E's forecast as reasonable.
19

²⁹⁸ Exhibit ORA-13, p. 40, lines 15-18.

1 **V. REBUTTAL TO PARTIES' CAPITAL PROPOSALS**

2 **TABLE BMB-32**

3 **Comparison of SDG&E and Intervenors**
4 **Estimated Capital Expenses**
5

TOTAL CAPITAL - Constant 2013 (\$000)			
	2014	2015	2016
SDG&E	\$26,743	\$26,317	\$15,579
ORA²⁹⁹	\$26,239	\$26,317	\$15,579
UCAN³⁰⁰	\$26,743	\$24,388	\$14,185
SDCAN	\$26,743	\$26,317	\$15,579
TURN	\$26,743	\$26,317	\$15,579
JMP	N/A	N/A	N/A

6
7 **A. ORA**

8 ORA does not take issue with SDG&E's proposed Customer Service IT capital projects.
9 ORA's analysis and recommendations regarding 2014 through TY 2016 capital expenditures
10 associated with such projects are presented in Exhibit ORA-15.³⁰¹
11

12 **B. UCAN**

13 **1. SDG&E's Bill Redesign Project**
14

15 **UCAN supports the goal of a bill redesign but is seeking additional information**
16 **prior to supporting \$3.323 million for SDG&E's Bill Redesign Project.**
17

18 As stated in its testimony, "UCAN is supportive of the goal of redesigning bills in order
19 to help customers better understand their energy usage and their bills."³⁰² However, UCAN is
20 not satisfied with SDG&E's response to its request for a detailed breakdown of the project costs.

21 In its response to UCAN-SEU-DR-02, Q4 and included as Appendix A, SDG&E
22 Responses to Data Requests, Attachment A.8, UCAN asked:

²⁹⁹ The capital request for Customer Service Operations, Information, and Technologies is addressed by Peter Morse in ORA's Information Technology testimony.

³⁰⁰ Estimated capital expenses based on disallowance for Bill Redesign Project described in UCAN testimony, p. 84, lines 14-20.

³⁰¹ Exhibit ORA-13, p. 1, lines 16-20.

³⁰² UCAN testimony, p. 84, lines 14-20.

1 4. Regarding the Bill Redesign project:

- 2 a. Please provide the total expenditure to date on the bill redesign project including
3 costs for all focus groups, surveys and other efforts.
- 4 b. Please provide a detailed breakdown of (i) past and (ii) forecasted expenditures
5 for the bill redesign project by general category including: focus groups, customer
6 studies, bill design, implementation, etc. Please expand on this list of categories as
7 appropriate.

8
9 SDG&E responded as follows:

- 10 a. Prior to project approval, routine labor and non-labor expenses are not tracked to
11 the specific project. SDG&E did incur an expense of \$36,000 to conduct focus
12 groups. SDG&E is not requesting any incremental O&M dollars for Bill
13 Redesign in its TY 2016 GRC request.
- 14
- 15 c. (i) The past expenses for the Bill Redesign project include \$36,000 for the focus
16 groups as provided for in the response to Question 4a above.
- 17 (ii) Forecasted capital expenditures for the Bill Redesign project are shown below
18 by the labor and non-labor categories. Further delineated non-labor categories are
19 currently not forecasted for GRC purposes. The forecasted expenditures are
20 outlined in the workpapers of witness Stephen Mikovits for which a copy can be
21 found on pages 265-267 of Brad Baugh's revised workpapers dated March 2015.
- 22

Year	Labor	Non-Labor	Total
2014	\$0	\$0	\$0
2015	\$1,449,000	\$480,000	\$1,929,000
2016	\$1,094,000	\$300,000	\$1,394,000

23
24 At the time SDG&E responded to UCAN's data request, the full scope of the Bill
25 Redesign Project and associated costs had not been finalized. However, since that time SDG&E
26 has determined the scope for Phase 1 of the project. SDG&E is proceeding with implementing
27 an enhanced version of the Bill Ready Notification email, which should be in service no later

1 than Q1 of TY 2016. Additionally, SDG&E will conduct a detailed analysis and evaluation in
2 the second half of 2015 to solidify the scope of Phase 2.

3 First, it is important to mention that SDG&E met with several interested parties,
4 including UCAN to discuss its Bill Redesign proposal and proactively requested input from the
5 parties. There were two in-person meetings and two teleconference meetings held with the
6 parties. Based on those meetings and our own internal analysis, SDG&E developed the detailed
7 costs and its current project plan as described below.

8 In an effort to improve the customer experience and customer understanding of the
9 SDG&E bill, SDG&E reviewed both the online bill and paper bill redesign options. For the
10 initial phase of the Bill Redesign Project, SDG&E has begun moving forward with enhancing its
11 Bill Ready Notification email. The Bill Ready Notification email is distributed to all My
12 Account customers each month when their bill becomes available. As of May 21, 2015, there
13 are 803,424 My Account customers.

14 Currently, the Bill Ready Notification email includes only high-level billing information
15 such as the amount due, due date and scheduled online payments. With the Bill Redesign
16 Project, the enhanced Bill Ready Notification will also include high-level cost-breakdown
17 information, usage history and tailored solutions such as energy efficiency rebates. This
18 approach will enable SDG&E to email high-interest billing items (i.e., Amount Due, Due Date,
19 Cost-Breakdown and Usage Chart) to more than 50% of its customers in the next nine months.
20 This email can be implemented quickly in support of upcoming changes to rates, such as
21 residential rate reform, SDG&E's Rate Design Window, and other time-of-use rate options. This
22 phase of the project is expected to cost \$989,000. Highlights of the Business Case developed for
23 internal evaluation purposes is shown in Appendix F. Additionally, here are the categorized
24 costs as requested by UCAN for Phase 1:
25

1
2

3
4
5
6
7
8

TABLE BMB-33
SDG&E Bill Redesign Project Costs - Phase I

Phase 1	Cost	Cost Categorization
Bill Ready Notification Enhancement	\$989,000	Focus Groups: \$0 Customer Studies: \$5,000 Bill Design: \$21,000 Customer Education: \$50,000 Hardware: \$10,000 Software: \$105,000 Implementation: \$500,000 (includes labor costs) Testing: \$298,000

SDG&E has also included the following draft concept of the Bill Ready Notification Enhancement for reference as shown in Picture BMB-12. This has evolved since the draft included in the Business Case.

PICTURE BMB-12



2

3

4 **C. SDCAN, TURN, and JMP**

5 SDCAN, TURN, and JMP do not take issue with SDG&E's proposed Customer Service
6 IT capital projects. As such, the Commission should adopt SDG&E's forecast as reasonable.

7

1 **VI. UNCOLLECTIBLE RATE**

2 **A. ORA**

3 The ORA explicitly adopts SDG&E's current authorized uncollectible rate of 0.174%
4 uncollectible rate³⁰³ as proposed by SDG&E³⁰⁴. Therefore, the Commission should adopt the
5 0.174% uncollectible rate as reasonable.

6
7 **B. UCAN, SDCAN, TURN, and JMP**

8 UCAN, SDCAN, TURN, and JMP do not take issue with SDG&E's proposed
9 uncollectible rate. As such, the Commission should adopt SDG&E's current authorized
10 uncollectible rate of 0.174%.

11
12 **VII. CONCLUSION**

13 To summarize, for the reasons described above, the intervening parties (ORA, UCAN,
14 SDCAN, TURN and JMP) have failed to show their proposals are valid recommendations that
15 should be adopted by the Commission.

16 Any reduction to SDG&E's TY 2016 forecast for Customer Service Operations,
17 Information, and Technologies is unwarranted.

18 With regard to SDG&E's Branch Offices, the Commission should not adopt ORA's and
19 UCAN's recommendations to deny SDG&E's overall request to close three of its Branch
20 Offices. Furthermore, the Commission should absolutely disregard the unnecessary
21 requirements these parties propose be required of SDG&E should the Commission approve
22 SDG&E's proposal.

23 Finally, JMP's recommendation that SDG&E spend 5% of any rate increases over the
24 three year GRC period be allocated to marketing, outreach and education to low-income
25 customers should not be a subject matter for this proceeding. This should be addressed in
26 SDG&E's Low-Income proceeding.

27 This concludes my prepared rebuttal testimony.

³⁰³ Exhibit ORA-13, p. 41, lines 13-14.

³⁰⁴ Exhibit SDG&E-14, p. BMB-118, line 16.

APPENDIX
TO
REBUTTAL TESTIMONY
OF BRADLEY M. BAUGH
ON BEHALF OF SDG&E
CUSTOMER SERVICE OPERATIONS, INFORMATION, AND TECHNOLOGIES

APPENDIX ATTACHMENTS

- A. SDG&E Responses to Data Requests
 - 1. ORA-SDG&E-DR-051-TLG, Q9
 - 2. ORA-SDG&E-DR-051-TLG, Q2
 - 3. ORA-SDG&E-DR-051-TLG, Q12c
 - 4. ORA-SDG&E-DR-051-TLG, Q14f
 - 5. ORA-SDG&E-DR-051-TLG, Q19
 - 6. ORA-SDG&E-DR-051-TLG, Q21d and Q21e
 - 7. ORA-SDG&E-DR-051-TLG, Q20c (Amended response)
 - 8. UCAN-SEU-DR-02, Q4
 - 9. Energy Division informal data request Q4, SDG&E response dated 2/12/15
 - 10. ORA-SDG&E-DR-072-TLG, Q1b
- B. ORA Response to SEU-ORA-DR-3, Exhibit ORA-13, Q1a-e and Q2a-b
- C. Supplemental Tables
 - 1. Summary of Efficiencies included in Exhibit SDG&E-14 TY2016 GRC Forecast
 - 2. Smart Pricing Program (SPP) Historical and Forecasted Expenses
 - 3. 2013 Payment Methods CARE/Non-CARE
 - 4. Proximity of Branch Offices to Nearest APL's
- D. Customer Impact Report: Utility Outage Communication Preferences – Executive Summary by J.D. Power and Associates
- E. Utility Residential Trusted Brand & Customer Engagement Study by Market Strategies International
- F. Bill Redesign Business Case Highlights – Bill Ready Notification Enhancement

Appendix A
SDG&E Responses to Data Requests

Attachment A.1 ORA-SDG&E-DR-051-TLG, Q9

ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015

9. For SDG&E’s Customer Service Operations, Information, and Technologies for 2009-2013 provide, in a spreadsheet similar to the one shown in workpapers on pages 209-210, a detailed and itemized listing of all labor and non-labor expenses (note: do not lump expenses together in the response, separate and identify the expenses by the categories as requested below) incurred for 1) employee meals, 2) employee luncheons, 3) vendor payments for offsite meetings and events (provide copies of contracts for costs and services provided), 4) all entertainment expenses, 5) employee recognition activities, 6) sporting events, 7) bonuses/awards, 8) employee/company memberships and dues, 9) all contributions, 10) charitable events, 11) brand awareness and loyalty surveys/campaigns/events, 12) lobbying activities or efforts to educate policymakers and assist in the development of legislation, and 13) other employee reimbursable expenses.

SDG&E Response:

The expenses shown in the attachment “ORA-SDGE-DR-051-TLG Q9 Attachment.xlsx” reflect the dollars spent in 2009-2013 as charged by the operating areas. The data shows that there is a variation in categories used, which is dependent upon the people responsible for assigning costs. All recorded costs are included in the attachment. Not all categories requested by ORA are specifically or separately identifiable. For example, sporting event related expense activities are not separately identified from other employee reimbursable expenses. Also, SDG&E does not explicitly conduct brand awareness or customer loyalty campaigns. SDG&E does conduct customer surveys that measure customer satisfaction, customer awareness, and effectiveness of SDG&E communications.

Please note that lobbying activities are not included in the recorded or requested GRC dollars. Lobbying activities are out of the scope of the GRC and are not ratepayer funded.

Furthermore, while responding to this data request, SDG&E discovered that SPP refundable dollars were not removed from the 2010-2012 historical labor expenses for workpaper group Communications & Research 100010. The 2013 dollars were properly adjusted, so this does not impact the incremental request in TY 2016.

These numbers will be corrected in the Errata filing that is expected to be filed in March. The impact will be as follows in constant 2013 dollars:

2010 Labor = -\$28k
2011 Labor = -\$200k
2012 Labor = -\$262k

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

						Fiscal year				
TOTAL O&M (NSS+USS)						2009	2010	2011	2012	2013
NON-SHARED Total						\$60,215,295	\$54,152,332	\$52,777,091	\$55,870,362	\$57,175,083
Workpaper	Workpaper Description	Cost Type	C/E Categ	Cost Element	Cost Element Description	Total 2009	Total 2010	Total 2011	Total 2012	Total 2013
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$1,845,684	\$2,226,970	\$2,218,804	\$4,117,036	\$3,894,330
100000.000	Advanced Metering Ops	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$3,565	\$12,161	\$8,602	\$11,438	\$2,446
100000.000	Advanced Metering Ops	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$88	\$277	\$7,297	\$8,377	\$3,040
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$296,275	\$210,131	\$142,373	\$369,004	\$300,803
100000.000	Advanced Metering Ops	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$1,087	\$5,277	\$4,979	\$4,924	\$1,193
100000.000	Advanced Metering Ops	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$2,716	\$3,281	\$1,626	(\$97)	\$101
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$1,812,077	\$1,804,600	\$1,686,078	\$1,629,372	\$2,177,883
100000.000	Advanced Metering Ops	Labor	02-Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$38,866	\$31,325	\$74,992	\$85,533	\$59,489
100000.000	Advanced Metering Ops	Labor	03-Overtime Labor DT	6110130	SAL-UNION D/T	\$41,252	\$50,806	\$37,405	\$153,389	\$71,427
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$6,910	\$17,982	\$0	(\$10,373)	\$0
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110200	SAL-UNIONCALLIN S/T	\$0	\$0	\$0	\$1,462	\$0
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110231	SAL-CALLIN MGMT S/T	\$0	\$0	\$0	(\$9,036)	\$0
100000.000	Advanced Metering Ops	Labor	01-Straight Time Labor	6110232	SAL-CALLIN C&T S/T	\$0	\$0	\$0	\$11,904	\$97
100000.000	Advanced Metering Ops	Labor	02-Overtime Labor T&1/2	6110241	SAL-CALLIN MGMT T&H	\$0	\$0	\$0	(\$18)	\$0
100000.000	Advanced Metering Ops	Labor	02-Overtime Labor T&1/2	6110242	SAL-CALLIN C&T T&H	\$0	\$0	\$0	(\$126)	\$15
100000.000	Advanced Metering Ops	Labor	05-Other Labor	6110256	SAL-MISC	\$5,997	\$0	\$52,671	(\$2,076)	\$8,529
100000.000	Advanced Metering Ops	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$0	\$0	\$13,613	\$0
100000.000	Advanced Metering Ops	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$10,634	\$8,986	\$0	\$0
100000.000	Advanced Metering Ops	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$580	\$629	\$944	\$1,244	\$1,942
100000.000	Advanced Metering Ops	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$626,107	\$696,352	\$625,253	\$925,269	\$1,034,277
100000.000	Advanced Metering Ops	Labor	Labor	Labor	TOTAL LABOR	\$4,681,204	\$5,070,424	\$4,870,010	\$7,310,839	\$7,555,572
100000.000	Advanced Metering Ops	Non-Labor	05-Employee Related	6120000	EMPLOYEE BENEFITS	\$529	\$0	\$603	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	05-Employee Related	6120041	EMP BEN-RELOCROSSUP	\$0	\$848	\$0	\$613	\$0
100000.000	Advanced Metering Ops	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$120	\$412	\$43
100000.000	Advanced Metering Ops	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$4,847	\$0	\$1,221	\$492	\$200
100000.000	Advanced Metering Ops	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$152	\$0
100000.000	Advanced Metering Ops	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$221	\$81	\$736	\$340	\$809
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$3,060	\$15,078	\$7,341	\$15,833	\$8,837
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$0	\$82	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$118	\$1,384	\$1,996	\$1,676	\$637
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$51	\$461	\$212	\$398	\$209
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$8,238	\$3,614	\$2,542	\$3,721	\$1,351
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$317	\$668	\$549	\$1,307	\$680
100000.000	Advanced Metering Ops	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$1,902	\$3,423	\$2,846	\$8,382	\$5,028
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$690	\$1,558	\$427	\$1,438	\$839
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$486	\$798	\$384	\$1,031	\$508
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$10,366	\$19,124	\$7,307	\$22,218	\$12,598
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$402	\$977
100000.000	Advanced Metering Ops	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$53	\$145	\$91	\$287	\$310
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$0	\$372	\$41	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6211380	MATL-ELECTRIC PARTS	\$678	\$33	\$1,310	\$5,564	\$2,827
100000.000	Advanced Metering Ops	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONERY	\$811	\$4,101	\$2,352	\$807	\$329
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$3,558	\$6,629	\$12,577	\$25,472	\$8,692
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$121	\$0	\$6,022	\$1,326	\$1,282
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6211535	MATL-VEHICLES	\$0	\$873	\$21,516	\$4,360	\$3,525
100000.000	Advanced Metering Ops	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$21,994	\$8,793	\$17,410	\$19,633	\$15,264
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$3,476	\$20,878	\$10,674	\$8,969	\$2,972

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					Fiscal year	2009	2010	2011	2012	2013
100000.000	Advanced Metering Ops	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$4,091	\$11,852	\$1,565	\$799	\$2,542
100000.000	Advanced Metering Ops	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$0	\$989	\$0
100000.000	Advanced Metering Ops	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$100	\$47	\$234	\$0	\$73
100000.000	Advanced Metering Ops	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$5,590	\$10,969	\$21,185	\$12,941	\$2,554
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$54	\$67	\$348	\$249
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213060	MATL-VEHICLE PARTS	\$4	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213070	MATL-PARTS	\$0	\$0	\$0	\$98	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213080	MATL-REPAIR PARTS	\$485	\$0	\$0	\$176	\$66
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$25,465	\$30,743	\$5,682	\$4,984	\$3,938
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$867	\$2,952	\$3,700	\$1,711
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$1,322	\$1,094	\$1,530	\$1,302	\$161
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213170	MATL-CIRCUIT BREAKRS	\$0	\$27	\$66	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$75,947	\$10,105	\$25,846	\$12,439	\$9,281
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213220	MATL-ELECTRIC METERS	\$29,982	\$0	\$0	\$0	\$776
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213222	MATL-UNDERGRND XFMRs	\$0	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213225	MATL-ELECTRIC EQUIP	\$39,352	\$78	\$883	\$9,575	\$21,556
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213320	MATL-REPR GENERATORS	(\$8,814)	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213325	MATL-HARDWARE	\$717	\$149	\$17	\$1,162	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213360	MATL-LOCKS	\$0	\$0	\$3,549	\$0	\$203
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213365	MATL-MEASURMT INSTRU	\$22,488	\$7,393	\$19,190	\$70,079	\$18,813
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213385	MATL-ELEC MISC	\$114,792	\$46,419	\$61,276	\$54,503	\$81,317
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$14,842	\$7,802	\$12,032	\$2,564	\$16,557
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$0	\$0	\$0	\$0	\$80
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213490	MATL-APPAREL	\$275	\$2,984	\$0	\$4,320	\$60
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$84	\$0	\$10,497	\$14,736	\$65
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$15,832	\$11,645	\$5,586	\$32,003	\$785
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213550	MATL-WIRE & CABLE	\$24	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$0	\$23,970	\$30,290	\$491
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213590	MATL-JANITORIAL SUPP	\$399	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6213680	MATL-CUSTOMER EVENT	\$0	\$209	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$203	\$16	\$481	\$2,770	\$2,527
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$2,534	\$2,750	\$6,963	\$3,177	\$4,919
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$13,424	\$8,127	\$14,362	\$7,518	\$11,120
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$2,427	\$1,248	\$3,626	\$3,907	\$1,991
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$5,785	\$5,236	\$6,891	\$5,242	\$7,375
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$7,490	\$9,301	\$15,126	\$12,411	\$11,493
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215105	MI-ORANGE COUNTY WRH	\$296	\$283	\$66	\$121	\$332
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$7,508	\$20,573	\$18,224	\$23,831	\$6,347
100000.000	Advanced Metering Ops	Non-Labor	12-Other Materials	6215115	MI-RAMONA WRHSE	\$56	\$0	\$3	\$0	\$24
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$243	\$0	\$841	\$348	\$0
100000.000	Advanced Metering Ops	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$6,113	\$11,797	\$3,109	\$13,370	\$2,557
100000.000	Advanced Metering Ops	Non-Labor	15-Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$0	\$6,754	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	15-Supplemental Workforce	6220005	SRV-CONTR-MAJOR PROJ	\$0	\$0	\$0	\$1,532	\$0
100000.000	Advanced Metering Ops	Non-Labor	15-Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$309	\$0	\$137	\$0
100000.000	Advanced Metering Ops	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$4,366	\$4,047	\$7,503	\$11,101	\$11,100
100000.000	Advanced Metering Ops	Non-Labor	01-Employee Luncheons	6220061	SRV-EXECUTIVE DINING	\$0	\$0	\$0	\$34	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220190	SRV-SECURITY	\$570	\$3,843	\$4,389	\$3,931	\$995
100000.000	Advanced Metering Ops	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$0	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FFLMT	\$1,702	\$2,240	\$3,241	\$0	\$183
100000.000	Advanced Metering Ops	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$0	\$136,716	\$79,032

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					Fiscal year	2009	2010	2011	2012	2013
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$225	\$74	\$1,747
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6220392	SRV-GRAPHICS IN-HSE	\$0	\$0	\$0	\$812	\$0
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$2,911	\$2,420	\$2,871	\$2,755	\$2,347
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$0	\$1,946
100000.000	Advanced Metering Ops	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$219	\$430	\$1,395	\$2,627	\$723
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$0	\$0	\$11	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220535	SRV-GOVT PERMITS	\$0	\$0	\$0	\$0	\$5,741
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$0	\$0	\$0	\$24	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$1,066	\$21,489	\$1,492	\$6,105	\$6,759
100000.000	Advanced Metering Ops	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$4,742	\$4,699	\$416	\$0	\$1,300
100000.000	Advanced Metering Ops	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$8,743	\$14,268	\$7,338	\$14,294	\$9,724
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6220812	SRV-BUS & CIVIC MTGS	\$0	\$5,933	\$0	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$0	\$0	\$3,994	\$1,121
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$0	\$0	\$3,106	\$5,453	\$3,249
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$41,575	\$42,204	\$50,259	\$53,211	\$58,875
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$14,472	\$9,396	\$9,591	\$22,936	\$14,337
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6220870	SRV-PHONE&COMMUN SYS	\$11	\$0	\$0	\$98	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220910	SRV-HAZ WASTE DISPOS	\$0	\$1,333	\$403	\$289	\$0
100000.000	Advanced Metering Ops	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$9,838	\$1,860	\$3,076	\$508	\$8,507
100000.000	Advanced Metering Ops	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$4,544	\$8,292	\$2,669	\$5,941	\$2,599
100000.000	Advanced Metering Ops	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$779	\$102	\$0
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6230500	SRV-SAFETY EVENT	\$0	\$1,361	\$0	\$2,324	\$2,301
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$0	\$1,179
100000.000	Advanced Metering Ops	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$1,569	\$21,756	\$3,637	\$13,892	\$315
100000.000	Advanced Metering Ops	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$0	\$0	\$0	\$0	\$350
100000.000	Advanced Metering Ops	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$913	\$1,112	\$1,611	\$1,736	\$1,742
100000.000	Advanced Metering Ops	Non-Labor	22-Govt Payments	6280001	GOV PYMNTS-PERMITS	\$0	\$172	\$495	\$1,203	\$479
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$0	\$0	\$226	\$0
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$0	\$0	\$0	\$437	\$0
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$58,468	\$68,926	\$83,480	\$98,159	\$84,183
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$19	\$0	\$18	\$0	\$0
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320005	TELE-PBX SERVICES	\$0	\$0	\$0	\$38	\$0
100000.000	Advanced Metering Ops	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$0	(\$2,472)	\$0
100000.000	Advanced Metering Ops	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$118)	\$0	(\$35)	\$0	(\$1)
100000.000	Advanced Metering Ops	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$606,181	\$513,476	\$552,139	\$842,767	\$578,711
100000.000	Advanced Metering Ops	TOTAL		TOTAL ALL		\$5,287,385	\$5,583,899	\$5,422,148	\$8,153,605	\$8,134,283
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$986,178	\$728,331	\$498,585	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$2,841	\$169	\$70	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$10,472	\$6,466	\$619	\$0	\$0
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$122,268	\$114,358	\$136,007	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$109	\$1,911	\$4,491	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$0	\$1,208	\$1,396	\$0	\$0
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$2,800,724	\$2,096,355	\$1,326,166	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$21,337	\$19,375	\$9,053	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110130	SAL-UNION D/T	\$211,670	\$210,016	\$106,554	\$0	\$0
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$0	\$1,388	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110190	SAL-TEMP P-T D/T	\$0	\$0	\$330	\$0	\$0
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110200	SAL-UNIONCALLIN S/T	\$3,405,906	\$2,512,268	\$1,345,116	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110210	SAL-UNIONCALLINT&1/2	\$22,334	\$17,609	\$9,759	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110220	SAL-UNION CALLIN D/T	\$249,784	\$238,630	\$136,708	\$0	\$0

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					Fiscal year	2009	2010	2011	2012	2013
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110230	SAL-NONUNCALLINS/T	\$0	\$1,962	\$31,125	\$0	\$0
100001.000	Meter Reading	Labor	01-Straight Time Labor	6110232	SAL-CALLIN C&T S/T	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110240	SAL-NONUNCALLINT&1/2	\$0	\$30	\$739	\$0	\$0
100001.000	Meter Reading	Labor	02-Overtime Labor T&1/2	6110242	SAL-CALLIN C&T T&H	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110250	SAL-NONUNCALLIN D/T	\$0	\$1,137	\$2,032	\$0	\$0
100001.000	Meter Reading	Labor	03-Overtime Labor DT	6110252	SAL-CALLIN C&T D/T	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Labor	05-Other Labor	6110256	SAL-MISC	\$5,811	\$2,246	\$16,235	\$0	\$0
100001.000	Meter Reading	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$4,785	\$0	\$0	\$0
100001.000	Meter Reading	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$813	\$1,133	\$854	\$0	\$0
100001.000	Meter Reading	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$1,210,534	\$948,512	\$534,291	\$0	\$0
100001.000	Meter Reading	Labor	Labor	Labor	TOTAL LABOR	\$9,050,781	\$6,906,500	\$4,161,519	\$0	\$0
100001.000	Meter Reading	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$6,197	\$3,119	\$9,668	\$0	\$0
100001.000	Meter Reading	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$56	\$889	\$0	\$0
100001.000	Meter Reading	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$444	\$9,017	\$285	\$0	\$0
100001.000	Meter Reading	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$1,948	\$1,970	\$516	\$0	\$0
100001.000	Meter Reading	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$20	\$35	\$135	\$0	\$0
100001.000	Meter Reading	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$1,280	\$502	\$579	\$0	\$0
100001.000	Meter Reading	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$0	\$351	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	11-Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$964	\$0	\$743	\$0	\$0
100001.000	Meter Reading	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$864	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6211485	MATL-RAINGEAR/APPARL	\$1,334	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$348	\$226	\$587	\$0	\$0
100001.000	Meter Reading	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$17,766	\$10,010	\$8,426	\$0	\$0
100001.000	Meter Reading	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$639	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$1,220	\$0	\$59	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$0	\$564	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$55	\$32	\$51	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$0	\$356	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$842	\$723	\$2,586	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$443	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$115	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$4,622	\$3,380	\$3,146	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$4,326	\$223	\$293	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213300	MATL-GASES-INDSTRIAL	\$0	\$741	(\$100)	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213360	MATL-LOCKS	\$9,715	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213490	MATL-APPAREL	\$0	\$226	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$63,926	\$23,219	\$10,570	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$2,749	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$10,197	\$1,624	\$5,953	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$8	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$3,818	\$441	\$1,464	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$1,424	\$0	\$48	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	(\$10)	\$31	\$298	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$7,533	\$171	\$53	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215105	MI-ORANGE COUNTY WRH	\$218	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$289	\$89	\$288	\$0	\$0
100001.000	Meter Reading	Non-Labor	12-Other Materials	6215115	MI-RAMONA WRHSE	\$0	\$15	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$3,590	\$1,535	\$247	\$0	\$0
100001.000	Meter Reading	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$6,384	\$322	\$2,076	\$0	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220190	SRV-SECURITY	\$2,266	\$1,707	\$703	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$366	\$933	\$179	\$0	\$0
100001.000	Meter Reading	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGNCY LABOR	\$23,928	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$5,188	\$2,881	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$6,910	\$1,341	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$98	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$677	\$647	\$457	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$0	\$278	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$5	\$93	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$3,936	\$4,009	\$7,234	\$0	\$0
100001.000	Meter Reading	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$0	\$896	\$0	\$0
100001.000	Meter Reading	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$3,576	\$5,724	\$1,874	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	(\$164)	\$208	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$53,011	\$38,172	\$21,331	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$28,109	\$9,958	\$52	\$0	\$0
100001.000	Meter Reading	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$1,766	\$978	\$436	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6220990	SRV-CMPTR HW MNT&LS	\$178,908	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	17-Purchased Services	6230200	SRV-OUTSIDE LEGAL	\$0	\$20,536	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$141,637	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$416	\$0	\$0
100001.000	Meter Reading	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$78	\$0	\$0
100001.000	Meter Reading	Non-Labor	05-Employee Related	6230554	SRV-RECRUITING WEB	\$332	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$2,128	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$805	\$695	\$0	\$0
100001.000	Meter Reading	Non-Labor	22-Govt Payments	6280001	GOV PYMNTS-PERMITS	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$6	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$19,605	\$2,801	\$5,275	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$52	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320005	TELE-PBX SERVICES	\$173	\$106	\$29	\$0	\$0
100001.000	Meter Reading	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$233	\$0	\$0	\$0	\$0
100001.000	Meter Reading	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$146)	(\$3)	(\$4)	\$0	\$0
100001.000	Meter Reading	Non-Labor	Non-Labor	TOTAL NON-LABOR		\$625,866	\$149,799	\$88,867	\$0	\$0
100001.000	Meter Reading	TOTAL	TOTAL ALL			\$9,676,647	\$7,056,300	\$4,250,387	\$0	\$0
100002.000	Billing	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$2,770,647	\$2,678,287	\$2,667,805	\$3,355,240	\$3,492,615
100002.000	Billing	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$1,483	\$6,362	\$6,580	\$5,219	\$4,032
100002.000	Billing	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$3,798	\$7,124	\$5,648	\$6,800	\$2,480
100002.000	Billing	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$953,336	\$918,377	\$758,646	\$686,844	\$612,065
100002.000	Billing	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$634	\$15,774	\$4,650	\$18,782	(\$117)
100002.000	Billing	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$3,731	\$14,152	\$4,060	\$15,133	\$785
100002.000	Billing	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$29	\$0	\$0	\$0	\$0
100002.000	Billing	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$0	\$0	\$38,472	\$0	\$0
100002.000	Billing	Labor	01-Straight Time Labor	6110142	SAL-EMP CNTR C&T S/T	\$0	\$0	\$0	\$559	\$0
100002.000	Billing	Labor	02-Overtime Labor T&1/2	6110150	SAL-TEMP F-T T&1/2	\$0	\$0	\$1,249	\$0	\$0
100002.000	Billing	Labor	02-Overtime Labor T&1/2	6110152	SAL-EMP CNTR C&T T&H	\$0	\$0	\$0	(\$62)	\$0
100002.000	Billing	Labor	03-Overtime Labor DT	6110160	SAL-TEMP F-T D/T	\$0	\$0	\$169	\$0	\$0
100002.000	Billing	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$13,517	\$17,753	\$0	\$0
100002.000	Billing	Labor	03-Overtime Labor DT	6110190	SAL-TEMP P-T D/T	\$0	\$0	\$20	\$0	\$0
100002.000	Billing	Labor	05-Other Labor	6110256	SAL-MISC	\$6,048	\$1,019	\$4,361	\$790	\$927
100002.000	Billing	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$0	\$8,770	\$0	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100002.000	Billing	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$3,814	\$0	\$0	\$4,086	\$2,500
100002.000	Billing	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$577,999	\$581,814	\$518,228	\$593,132	\$652,685
100002.000	Billing	Labor		Labor	TOTAL LABOR	\$4,321,519	\$4,236,427	\$4,036,412	\$4,686,523	\$4,767,971
100002.000	Billing	Non-Labor	05-Employee Related	6120029	EMP BEN-COBRA TERM	\$0	\$0	\$2,078	\$0	\$0
100002.000	Billing	Non-Labor	05-Employee Related	6120053	EMP BEN-MISC	\$28	\$0	\$0	\$0	\$0
100002.000	Billing	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$60	\$118	\$154
100002.000	Billing	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$0	\$0	\$0	\$0	\$2,065
100002.000	Billing	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$3,621	\$52	\$0	\$0
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$3,160	\$4,076	\$2,155	\$5,360	\$2,818
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$299	\$377	\$0	\$0	\$0
100002.000	Billing	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$165	\$0	\$9,140	\$8,494
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$0	\$0	\$5	\$15
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$2,361	\$1,983	\$2,213	\$1,848	\$223
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$288	\$263	\$358	\$648	\$334
100002.000	Billing	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$1,094	\$2,631	\$2,728	\$2,393	\$1,113
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$444	\$554	\$271	\$410	\$328
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$3,535	\$2,545	\$1,580	\$6,383	\$1,885
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$0	\$344	\$0	\$0
100002.000	Billing	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$203	\$0
100002.000	Billing	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$4	\$0	\$0	\$0	\$6
100002.000	Billing	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$284	\$0	\$0	\$0	(\$500)
100002.000	Billing	Non-Labor	11-Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$0	\$0	\$0	\$0	\$466
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$204	\$52
100002.000	Billing	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$260	\$216	\$1,221	\$620	\$376
100002.000	Billing	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$82,655	\$91,475	\$90,380	\$73,660	\$59,307
100002.000	Billing	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$0	\$0	\$0	\$3
100002.000	Billing	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$2,035	\$0	\$0	\$2,570	\$1,600
100002.000	Billing	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$264	\$442	\$310	\$0	\$0
100002.000	Billing	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$492	\$0	\$1,553	\$679
100002.000	Billing	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$1,379	\$2,368	\$4,500	\$8,488	\$2,319
100002.000	Billing	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$9	\$0	\$0	\$0	\$0
100002.000	Billing	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$202	\$1,921	\$654	\$1,864	\$691
100002.000	Billing	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$874	\$665	\$1,142	\$478	\$1,375
100002.000	Billing	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$3,464	\$32,480	\$6,597	\$3,815	\$2,977
100002.000	Billing	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$0	\$541
100002.000	Billing	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$317	\$301	\$1,283	\$0	\$0
100002.000	Billing	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$38	\$264
100002.000	Billing	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$3,224	\$240	\$0	\$0
100002.000	Billing	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$97	\$182	\$0	\$0	\$0
100002.000	Billing	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$0	\$0	\$13	\$0	\$0
100002.000	Billing	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$0	\$10	\$0	\$10	\$46
100002.000	Billing	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$15	\$0	\$19	\$184	\$39
100002.000	Billing	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$10	\$0	\$0	\$0
100002.000	Billing	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$0	\$14,389	\$4,215	\$2,147	\$2,366
100002.000	Billing	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$697	\$8,187	\$626	\$2,502	\$2,313
100002.000	Billing	Non-Labor	15-Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$43	\$0	\$0	\$0
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$0	\$0	\$208	\$863	\$0
100002.000	Billing	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$5,099	\$1,605	\$4,566	\$7,904	\$3,427
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$0	\$84	\$0	\$0
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$0	\$0	\$0	\$305	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
100002.000	Billing	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$1,703	\$2,053	\$1,272	\$3,052	\$5,050
100002.000	Billing	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$41,152	\$37,864	\$7,991	\$45,547
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$853	\$1,512	\$225
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$77,012	\$93,814	\$113,972	\$126,013	\$107,034
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$38	\$19,189	\$0	\$0	\$0
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$0	\$0	\$222	\$199
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$564	\$0
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,956	\$6,242	\$9,503	\$10,955	\$9,786
100002.000	Billing	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$17	\$0	\$0	\$0
100002.000	Billing	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$0	\$7,006	\$2,757	\$10,341
100002.000	Billing	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$70	\$44	\$0	\$7	\$0
100002.000	Billing	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$249	\$0	\$21	\$12	\$100
100002.000	Billing	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$9,262	\$4,155	\$0	\$0
100002.000	Billing	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$4,871	\$2,098	\$4,777	\$7,800	\$4,269
100002.000	Billing	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$0	\$15	\$0	\$0	\$0
100002.000	Billing	Non-Labor	17-Purchased Services	6220900	SRV-TRASH COLLECTION	\$0	\$0	\$0	\$0	\$8,560
100002.000	Billing	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$166	\$378	\$416	\$254	\$550
100002.000	Billing	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$2,230	\$2,736	\$1,064	\$3,164	\$3,175
100002.000	Billing	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$13,820	\$10,571	\$7,903	\$8,333	\$11,802
100002.000	Billing	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$52	\$254	\$0
100002.000	Billing	Non-Labor	09-Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$0	\$0	\$713	\$0	\$0
100002.000	Billing	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$1,959	\$4,058	\$5,052	\$1,759	\$1,514
100002.000	Billing	Non-Labor	05-Employee Related	6230550	SRV-RECRUITING	\$0	\$0	\$0	\$127	\$0
100002.000	Billing	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$276	\$0	\$0	\$1,754	\$0
100002.000	Billing	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$0	\$0	\$781	\$2,036	\$0
100002.000	Billing	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$11,042	\$0	\$0	\$122	\$0
100002.000	Billing	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$93	\$239	\$114	\$59	\$36
100002.000	Billing	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$310	\$339	\$941	\$628	\$290
100002.000	Billing	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$6,436	\$6,830	\$3,955	\$2,875	\$994
100002.000	Billing	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$251	\$383	\$145	\$123	\$0
100002.000	Billing	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$4)	\$0	\$0	\$0	\$0
100002.000	Billing	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$231,345	\$373,648	\$328,457	\$316,085	\$305,244
100002.000	Billing	TOTAL	TOTAL ALL	TOTAL ALL		\$4,552,864	\$4,610,075	\$4,364,869	\$5,002,608	\$5,073,216
100003.000	Credit & Collections	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$1,427,224	\$1,458,324	\$1,527,905	\$1,505,421	\$1,576,637
100003.000	Credit & Collections	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$839	\$777	\$496	\$1,241	\$3,792
100003.000	Credit & Collections	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$589	\$1,350	\$839	\$0	\$674
100003.000	Credit & Collections	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$286,832	\$288,031	\$286,829	\$346,921	\$338,941
100003.000	Credit & Collections	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$0	\$24	\$144	\$61	\$0
100003.000	Credit & Collections	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$26	\$0	\$0	\$0	\$17
100003.000	Credit & Collections	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$0	(\$641)	\$0	\$0
100003.000	Credit & Collections	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$34,857	\$33,647	\$0	\$0	\$0
100003.000	Credit & Collections	Labor	05-Other Labor	6110256	SAL-MISC	\$3,075	\$0	\$2,996	\$736	\$521
100003.000	Credit & Collections	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$0	\$0	\$2,000
100003.000	Credit & Collections	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$270,731	\$283,719	\$267,875	\$268,700	\$304,921
100003.000	Credit & Collections	Labor	Labor	Labor	TOTAL LABOR	\$2,024,173	\$2,065,872	\$2,086,442	\$2,123,079	\$2,227,503
100003.000	Credit & Collections	Non-Labor	05-Employee Related	6120000	EMPLOYEE BENEFITS	\$3,396	\$3,251	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	05-Employee Related	6120011	EMP BEN-LT DISABILIT	(\$4,816)	\$0	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	05-Employee Related	6120053	EMP BEN-MISC	\$0	\$527	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$21	\$0	\$100
100003.000	Credit & Collections	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$973	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100003.000	Credit & Collections	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$514	\$313	\$36	\$327	\$0
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$705	\$2,660	\$3,234	\$4,701	\$756
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$101	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$404	\$335	\$237
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$0	\$10	\$0	\$20
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$852	\$768	\$451	\$91	\$316
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$29	\$138	\$211	\$328	\$150
100003.000	Credit & Collections	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$580	\$1,947	\$915	\$1,457	\$615
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$144	\$0	\$0
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$80	\$493	\$348	\$239	\$172
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$2,361	\$4,470	\$2,666	\$2,998	\$1,096
100003.000	Credit & Collections	Non-Labor	07-Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$0	\$121	\$0
100003.000	Credit & Collections	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$33	\$0	\$1,282	\$37	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$14,068	\$22,569	\$3,622	\$0	\$0
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$827	\$1,811	\$0	\$0
100003.000	Credit & Collections	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$77	\$474	\$827	\$324	\$119
100003.000	Credit & Collections	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$9,998	\$8,945	\$9,652	\$12,447	\$6,262
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$167	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	(\$5)	\$0	\$4,022	\$2,537	\$0
100003.000	Credit & Collections	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$24	\$0	\$0	\$0	\$22
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$137	\$177	\$2,401	\$236	\$66,279
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6213031	MATL-DISTRIB SOFTWARE	\$0	\$0	\$0	\$0	\$3,935
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6213032	MATL-MAINFRAME SOFTW	\$0	\$0	\$0	\$0	\$31,456
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$105	\$0	\$10	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213080	MATL-REPAIR PARTS	\$398	\$195	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$1,670	\$628	\$107	\$334	\$1,883
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$61	\$2,551	\$24	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$0	\$0	\$169	\$216
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$5,978	\$828	\$5,010	\$896	\$198
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213385	MATL-ELEC MISC	\$0	\$1,722	\$1,824	\$2,254	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$1,159	\$0	\$0	\$202	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$0	\$0	\$94
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$4,864	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$0	\$877	\$27	\$72	\$27
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$68	\$12	\$0	\$5	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$10	\$0	\$167	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$8	\$74	\$208	\$0	\$88
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$180	\$0	\$1,457	\$163	\$284
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$31	\$944	\$802	\$421	\$64
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215105	MI-ORANGE COUNTY WRH	\$0	\$21	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$0	\$2	\$0	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$159,220	\$154,615	\$125,716	\$49,965	\$79,701
100003.000	Credit & Collections	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$476	\$347	\$503	\$2,037	\$1,047
100003.000	Credit & Collections	Non-Labor	15-Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$7,717	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$1,090	\$536	\$1,200	\$1,273	\$2,310
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$0	\$2,335	\$956	\$0	\$0
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6220251	SRV-DISTRIB SOFTWARE	\$0	\$0	\$0	\$0	\$36,680
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FFLMT	\$191	\$0	\$183	\$362	\$360
100003.000	Credit & Collections	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$0	\$0	\$24	\$8,101
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$406	\$122	\$222

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$12,119	\$8,637	\$54,703	\$21,700	\$1,856
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$0	\$0	\$354	\$0	\$0
100003.000	Credit & Collections	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$449	\$119	\$587	\$59	\$237
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$0	\$1,145	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$32,531	\$31,937	\$29,736	\$27,038	\$18,859
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220520	SRV-GOV TRNKEY-AUDIT	\$0	\$0	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220535	SRV-GOV'T PERMITS	\$0	\$0	\$0	\$0	\$190
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$6	\$0	\$21	\$0	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$0	\$0	\$9	\$903	\$0
100003.000	Credit & Collections	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$1,429	\$1,849	\$6,033	\$2,352	\$1,515
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$130	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$0	\$0	\$0	\$177	\$0
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$333	\$618	\$611	\$1,359	\$2,488
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$0	\$0	\$0	\$0	\$1,036
100003.000	Credit & Collections	Non-Labor	18-Telephone Expenses	6220870	SRV-PHONE&COMMUN SYS	\$0	\$0	\$0	\$0	\$79
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$221	\$324	\$52	\$818	\$200
100003.000	Credit & Collections	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$1,651	\$0	\$354	\$788	\$1,364
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$1,053	\$759	\$367	\$484	\$375
100003.000	Credit & Collections	Non-Labor	17-Purchased Services	6221020	SRV-COLLECTIONS	\$293,037	\$236,772	\$263,248	\$289,575	\$200,394
100003.000	Credit & Collections	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$0	\$9,197	\$3,554
100003.000	Credit & Collections	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$51	\$0
100003.000	Credit & Collections	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$230	\$190	\$336	\$25	\$40
100003.000	Credit & Collections	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$1,376	\$3,004	\$870	\$1,396	\$0
100003.000	Credit & Collections	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$170	\$0	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	20-Dues	6250000	Dues	\$0	\$0	\$260	\$0	\$0
100003.000	Credit & Collections	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$88	\$0	\$375	\$0	\$180
100003.000	Credit & Collections	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$2,489	\$4,376	\$274	\$0	\$0
100003.000	Credit & Collections	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$6,859	\$5,373	\$3,634	\$5,022	\$5,415
100003.000	Credit & Collections	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$3)	(\$59)	\$0	\$0	\$0
100003.000	Credit & Collections	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$0	\$0	\$0	\$109	\$0
100003.000	Credit & Collections	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$552,715	\$516,403	\$537,347	\$446,504	\$480,590
100003.000	Credit & Collections	TOTAL		TOTAL ALL		\$2,576,889	\$2,582,275	\$2,623,790	\$2,569,583	\$2,708,092
100004.000	Remittance Processing	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$558	\$0	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$800,809	\$610,544	\$621,409	\$542,765	\$570,464
100004.000	Remittance Processing	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$41	\$0	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$114,714	\$98,042	\$107,488	\$108,241	\$109,776
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$6,305	\$4,369	\$702	\$0	\$0
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$973	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$2,054	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$182	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$0	\$835	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$278	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	09-Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$101,423	\$158,994	\$155,885	\$163,845	\$181,164
100004.000	Remittance Processing	Non-Labor	17-Purchased Services	6220520	SRV-GOV TRNKEY-AUDIT	\$0	\$0	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	17-Purchased Services	6221080	SRV-LANGUAGE SVCS	\$0	\$0	\$0	\$0	\$113
100004.000	Remittance Processing	Non-Labor	10-Computer Related	6230270	SRV-DATA PROC	\$0	\$0	\$0	\$0	\$25,575
100004.000	Remittance Processing	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$751	\$442	\$0	\$0	\$0
100004.000	Remittance Processing	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$293	\$54	\$0	\$0
100004.000	Remittance Processing	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$1,024,600	\$877,006	\$885,537	\$814,851	\$887,092
100004.000	Remittance Processing	TOTAL		TOTAL ALL		\$1,024,600	\$877,006	\$885,537	\$814,851	\$887,092

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
10004.001	Postage	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$0	\$0	\$0	(\$0)
10004.001	Postage	NSE	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$5,058,434	\$5,007,500	\$4,978,737	\$4,597,102	\$4,431,280
10004.001	Postage	TOTAL		TOTAL ALL		\$5,058,434	\$5,007,500	\$4,978,737	\$4,597,102	\$4,431,280
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$300,987	\$407,845	\$391,838	\$366,557	\$415,938
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$805,966	\$654,799	\$723,427	\$742,272	\$738,184
10005.000	Branch Offices	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$12,772	\$9,407	\$14,789	\$15,907	\$6,656
10005.000	Branch Offices	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$752	\$1,376	\$2,708	\$2,933	\$6,710
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$0	\$0	\$1,204	\$0
10005.000	Branch Offices	Labor	03-Overtime Labor DT	6110130	SAL-UNION D/T	\$0	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$117,337	\$134,551	\$129,593	\$0	\$0
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$100,311	\$126,676
10005.000	Branch Offices	Labor	02-Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$667	\$917	\$2,262	\$0	\$0
10005.000	Branch Offices	Labor	02-Overtime Labor T&1/2	6110182	SAL-PT TIME C&T T&H	\$0	\$0	\$0	\$1,058	\$808
10005.000	Branch Offices	Labor	03-Overtime Labor DT	6110190	SAL-TEMP P-T D/T	\$67	\$157	\$292	\$0	\$0
10005.000	Branch Offices	Labor	03-Overtime Labor DT	6110192	SAL-PT TIME C&T D/T	\$0	\$0	\$0	\$166	\$216
10005.000	Branch Offices	Labor	01-Straight Time Labor	6110200	SAL-UNIONCALLIN S/T	\$0	\$0	\$1,495	\$0	\$0
10005.000	Branch Offices	Labor	02-Overtime Labor T&1/2	6110210	SAL-UNIONCALLINT&1/2	\$0	\$0	\$20	\$0	\$0
10005.000	Branch Offices	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$403	\$3,970	\$276	\$2,174
10005.000	Branch Offices	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$41	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$191,238	\$192,545	\$187,129	\$178,326	\$205,762
10005.000	Branch Offices	Labor		Labor	TOTAL LABOR	\$1,429,828	\$1,401,999	\$1,457,522	\$1,409,008	\$1,503,124
10005.000	Branch Offices	Non-Labor	05-Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	\$0	\$0	(\$3,294)	\$0
10005.000	Branch Offices	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$42	\$59	\$0
10005.000	Branch Offices	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$0	\$0	\$0	\$0	\$1,500
10005.000	Branch Offices	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$470	\$22	\$317	\$51	\$25
10005.000	Branch Offices	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$112	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$255	\$758	\$1,053	\$0	\$0
10005.000	Branch Offices	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$467	\$692	\$680	\$448	\$3,373
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$0	\$4	\$0	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$19,872	\$18,767	\$19,522	\$17,983	\$23,174
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$0	\$15	\$31	\$61	\$60
10005.000	Branch Offices	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$194	\$174	\$1,136	\$407
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$144	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$32	\$0	\$118	\$0	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$545	\$1,807	\$1,867	\$0	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$650	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$23	\$112	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$448	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$1,869	\$2,529	\$1,945	\$2,830	\$1,829
10005.000	Branch Offices	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$0	\$0	\$0	\$129	\$0
10005.000	Branch Offices	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$18,020	\$20,308	\$11,621	\$14,672	\$10,360
10005.000	Branch Offices	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$1,009	\$857	\$2,849	\$2,570	\$0
10005.000	Branch Offices	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$349	\$73	\$292	\$0
10005.000	Branch Offices	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$41,757	\$618	\$0	\$7,395	\$543
10005.000	Branch Offices	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$377	\$44	\$333	\$294	\$0
10005.000	Branch Offices	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$467	\$615	\$577	\$637	\$752
10005.000	Branch Offices	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$128	\$341	\$431	\$164	\$286
10005.000	Branch Offices	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$715	\$2,553	\$6,305	\$4,186	\$3,897
10005.000	Branch Offices	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$0	\$83
10005.000	Branch Offices	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$127	\$132	\$0	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
10005.000	Branch Offices	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$111	\$0
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$1,216	\$553	\$273	\$122	\$0
10005.000	Branch Offices	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$16	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$0	\$0	\$0	\$0	\$15
10005.000	Branch Offices	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$139	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$93,332	\$101,118	\$119,973	\$109,539	\$115,283
10005.000	Branch Offices	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$5,792	\$2,463	\$4,110	\$4,092	\$1,433
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$23,138	\$391	\$1,015	\$0	\$3,055
10005.000	Branch Offices	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$0	\$0	\$355	\$823	\$690
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220190	SRV-SECURITY	\$0	\$0	\$0	\$0	\$22,499
10005.000	Branch Offices	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$382	\$560	\$0	\$0	\$180
10005.000	Branch Offices	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$0	\$373	\$5,809	\$146	\$0
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$3,939	\$1,580	\$3,258	\$214	\$1,550
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$1,011	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$0	\$100	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$31	\$0
10005.000	Branch Offices	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1	\$383	\$3,448	\$187	\$1,018
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$5,698	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$64	\$0	\$18,010	\$10	\$18
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$208,890	\$171,368	\$225,667	\$217,143	\$223,874
10005.000	Branch Offices	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$1,079	\$0	\$542	\$416	\$262
10005.000	Branch Offices	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$2,358	\$2,400	\$280	\$1,017	\$710
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$6,399	\$5,471	\$5,413	\$4,599	\$5,401
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$32,603	\$158	\$0	\$0	\$2,763
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220900	SRV-TRASH COLLECTION	\$0	\$22,239	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$166	\$162	\$519	\$406	\$100
10005.000	Branch Offices	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$1,128	\$65	\$52	\$51	\$50
10005.000	Branch Offices	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$15,547	\$69,602	\$44,875	\$52,174	\$46,007
10005.000	Branch Offices	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$152	\$0
10005.000	Branch Offices	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$1,604	\$636
10005.000	Branch Offices	Non-Labor	17-Purchased Services	6230610	SRV-WATER	\$0	\$0	\$0	\$647	\$1,465
10005.000	Branch Offices	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$359	\$54	\$1,169	\$2,732	\$0
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$425	\$473	\$487	\$550	\$678
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$410	\$266	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$3,767	\$6,126	\$5,017	\$3,748	\$3,134
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$55	\$0	\$0	\$0	\$0
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320005	TELE-PBX SERVICES	\$0	\$224	\$604	\$370	\$126
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320007	TELE-DATA	\$9,051	\$9,416	\$8,926	\$9,049	\$9,763
10005.000	Branch Offices	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$21,735	\$22,873	\$22,882	\$25,312	\$28,773
10005.000	Branch Offices	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$30)	\$0	(\$19)	\$0	(\$150)
10005.000	Branch Offices	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$525,636	\$469,412	\$520,739	\$484,968	\$515,619
10005.000	Branch Offices	TOTAL		TOTAL ALL		\$1,955,464	\$1,871,410	\$1,978,261	\$1,893,976	\$2,018,743
10006.000	CCC Operations	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$1,050,384	\$1,021,098	\$960,938	\$1,183,029	\$1,207,589
10006.000	CCC Operations	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$0	\$0	\$243	\$0
10006.000	CCC Operations	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$3,780,119	\$3,966,142	\$4,256,889	\$4,147,226	\$4,727,078
10006.000	CCC Operations	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$28,173	\$19,683	\$43,199	\$40,781	\$44,215
10006.000	CCC Operations	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$42,998	\$50,700	\$198,146	\$529,337	\$552,181
10006.000	CCC Operations	Labor	01-Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$0	\$149
10006.000	CCC Operations	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$3,100,575	\$2,617,450	\$1,994,730	\$0	\$0
10006.000	CCC Operations	Labor	01-Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$1,526,655	\$1,031,975

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					Fiscal year	2009	2010	2011	2012	2013
100006.000	CCC Operations	Labor	02-Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$7,329	\$4,632	\$3,743	\$0	\$0
100006.000	CCC Operations	Labor	02-Overtime Labor T&1/2	6110182	SAL-PT TIME C&T T&H	\$0	\$0	\$0	\$3,345	\$4,877
100006.000	CCC Operations	Labor	03-Overtime Labor DT	6110190	SAL-TEMP P-T D/T	\$13,461	\$8,419	\$29,895	\$0	\$0
100006.000	CCC Operations	Labor	03-Overtime Labor DT	6110192	SAL-PT TIME C&T D/T	\$0	\$0	\$0	\$30,039	\$12,641
100006.000	CCC Operations	Labor	01-Straight Time Labor	6110200	SAL-UNIONCALLIN S/T	\$0	\$682	\$0	\$0	\$0
100006.000	CCC Operations	Labor	05-Other Labor	6110256	SAL-MISC	\$7,396	\$24,583	\$0	\$6,931	\$2,208
100006.000	CCC Operations	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$0	\$0	\$0	\$9,000
100006.000	CCC Operations	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$238	\$39	\$336	\$780	\$6,904
100006.000	CCC Operations	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$1,239,936	\$1,227,978	\$1,102,964	\$1,082,166	\$1,205,172
100006.000	CCC Operations	Labor	Labor	Labor	TOTAL LABOR	\$9,270,609	\$8,941,407	\$8,590,841	\$8,550,533	\$8,803,989
100006.000	CCC Operations	Non-Labor	05-Employee Related	6120011	EMP BEN-LT DISABILIT	\$0	(\$8,261)	(\$995)	(\$76)	\$0
100006.000	CCC Operations	Non-Labor	05-Employee Related	6120053	EMP BEN-MISC	\$28	\$0	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	05-Employee Related	6120078	EMP BEN-RET TOWRKEXM	\$0	\$0	\$0	\$3,296	\$0
100006.000	CCC Operations	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$744	\$2,413	\$1,243
100006.000	CCC Operations	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$2,507	\$0	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$6,023	\$7,080
100006.000	CCC Operations	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$73	\$5,421	\$1,053
100006.000	CCC Operations	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$674	\$415
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$0	\$0	\$0	\$5,654	\$2,221
100006.000	CCC Operations	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$576	\$298	\$703
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$1,539	\$1,489	\$2,206	\$3,267	\$1,531
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$0	\$11	\$12	\$598	\$17
100006.000	CCC Operations	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$137	\$0	\$31	\$1,849	\$2,041
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$0	\$0	\$0	\$0	\$1,738
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$92	\$159	\$0	\$5,291	\$4,319
100006.000	CCC Operations	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$855	\$0
100006.000	CCC Operations	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$0	\$0	\$853	\$35
100006.000	CCC Operations	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$318	\$102	\$661	\$775	\$774
100006.000	CCC Operations	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$30,068	\$64,780	\$48,883	\$57,116	\$49,478
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$0	\$0	\$0	\$152
100006.000	CCC Operations	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$351	\$71,206	\$25,831	\$33,030	\$59,193
100006.000	CCC Operations	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$73	\$0	\$340	\$0	\$0
100006.000	CCC Operations	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$27	\$0	\$0	\$232	\$241
100006.000	CCC Operations	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$920	\$1,199	\$3,962	\$1,547	\$932
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$2,251	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$3	\$20,110	\$2,964	\$23,800	\$2,978
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$473	\$2,162	\$1,943	\$549	\$0
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213160	MATL-CHARTS	\$0	\$0	\$172	\$0	\$0
100006.000	CCC Operations	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$4,970	\$109,362	(\$74,469)	\$26,868	\$5,238
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$1,850	\$0	\$380	\$276
100006.000	CCC Operations	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$1,616	\$69	\$0	\$1,066	\$0
100006.000	CCC Operations	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$8,455	\$4,752	\$119,240	\$0	\$4,031
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$0	\$0	\$29	\$0	\$0
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$3	\$34	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$0	\$31	\$0	\$0	\$8
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$0	\$22	\$11	\$38	\$4
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$0	\$8	\$130	\$931	\$39
100006.000	CCC Operations	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$0	\$11	\$0	\$0
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$0	\$93	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$4,401	\$2,229	\$19,768	\$12,590	\$7,681

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					Fiscal year	2009	2010	2011	2012	2013
100006.000	CCC Operations	Non-Labor	05-Employee Related	6220019	SRV-PRE-EMPL TESTING	\$5,968	\$0	\$935	\$3,656	\$9,900
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$0	\$0	\$0	\$0	\$326
100006.000	CCC Operations	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$2,187	\$1,579	\$2,206	\$10,748	\$14,744
100006.000	CCC Operations	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$191	\$0	\$0	\$2,736	\$0
100006.000	CCC Operations	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$64	\$16,164	\$36,998	\$30,109	\$68,718
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$10	\$66	\$2,656	\$5,067	\$2,194
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$8,374	\$5,411	\$2,622	\$2,563	\$2,507
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220403	SRV-PRINTNG ENVLOPES	(\$153)	\$0	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$112	\$7,273	\$6,391
100006.000	CCC Operations	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$946	\$7,060	\$9,111	\$11,337	\$12,132
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$0	\$557	\$0	\$0	\$0
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$185	\$0	\$0	\$95
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$0	\$0	\$0	\$0	\$138
100006.000	CCC Operations	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$0	\$0	\$1,610	\$71,388	\$93,376
100006.000	CCC Operations	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$1,377	\$974	\$2,420	\$1,824	\$2,192
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220810	SRV-CUSTOMER SERVCS	\$0	\$0	\$1,902	\$0	\$0
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$553	\$162	\$467	\$51	\$150
100006.000	CCC Operations	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$485	\$490	\$1,082	\$4,293	\$566
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$643	\$208	\$365	\$193	\$472
100006.000	CCC Operations	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$0	\$0	\$976
100006.000	CCC Operations	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$104	\$254	\$0
100006.000	CCC Operations	Non-Labor	07-Events	6230500	SRV-SAFETY EVENT	\$10,309	\$7,531	\$8,618	\$5,883	\$4,238
100006.000	CCC Operations	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$3,813	\$4,908	\$10,045	\$32	\$0
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$0	\$0	\$0	\$0	\$4,000
100006.000	CCC Operations	Non-Labor	17-Purchased Services	6230610	SRV-WATER	\$0	\$0	\$0	\$647	\$509
100006.000	CCC Operations	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$0	\$0	\$1,209	\$0
100006.000	CCC Operations	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$0	\$0	\$0	\$3,390
100006.000	CCC Operations	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$0	\$0	\$0	\$0	\$2,208
100006.000	CCC Operations	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$1,778	\$1,780	\$1,562	\$1,567	\$910
100006.000	CCC Operations	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$1,614	\$1,401	\$1,237	\$1,073	\$584
100006.000	CCC Operations	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$10)	\$0	\$0	(\$39)	\$0
100006.000	CCC Operations	Non-Labor	23-Misc NL Costs	6400390	A&G-MAINT&REPAIRS	\$0	\$0	\$0	\$148	\$118
100006.000	CCC Operations	Non-Labor	23-Misc NL Costs	6400930	A&G-ELECTRIC PUC FEE	\$0	\$0	\$0	\$34	\$0
100006.000	CCC Operations	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$94,129	\$322,133	\$236,177	\$357,384	\$384,258
100006.000	CCC Operations	TOTAL		TOTAL ALL		\$9,364,738	\$9,263,540	\$8,827,018	\$8,907,917	\$9,188,247
100007.000	CCC Support	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$935,523	\$878,502	\$1,024,172	\$1,071,331	\$992,817
100007.000	CCC Support	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$175,490	\$115,078	\$106,451	\$125,736	\$125,961
100007.000	CCC Support	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$1,021	\$546	\$1,017	\$3,655	\$8,052
100007.000	CCC Support	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$48	\$505	\$1,713	\$3,193	\$3,653
100007.000	CCC Support	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$129	\$581	\$0	\$0	\$0
100007.000	CCC Support	Labor	01-Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$18,216	(\$194)
100007.000	CCC Support	Labor	02-Overtime Labor T&1/2	6110182	SAL-PT TIME C&T T&H	\$0	\$0	\$0	\$631	(\$3)
100007.000	CCC Support	Labor	03-Overtime Labor DT	6110192	SAL-PT TIME C&T D/T	\$0	\$0	\$0	\$437	(\$140)
100007.000	CCC Support	Labor	05-Other Labor	6110256	SAL-MISC	\$14,167	\$0	\$0	\$2,176	\$0
100007.000	CCC Support	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$0	\$0	\$3,500
100007.000	CCC Support	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$54	\$20	\$40	\$17	\$0
100007.000	CCC Support	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$173,921	\$158,441	\$166,949	\$177,559	\$179,796
100007.000	CCC Support	Labor		Labor	TOTAL LABOR	\$1,300,354	\$1,153,674	\$1,300,340	\$1,402,951	\$1,313,444
100007.000	CCC Support	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$0	\$39	\$0
100007.000	CCC Support	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$812	\$725

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100007.000	CCC Support	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$0	\$125	\$0
100007.000	CCC Support	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$152	\$0
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$0	\$378	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$16	\$52	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$435	\$728	\$1,066	\$752
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$3,753	\$2,477	\$701	\$73	\$19
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$129	\$97	\$0	\$91	\$0
100007.000	CCC Support	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$518	\$2,754	\$21	\$474	\$232
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$0	\$22	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$445	\$645	\$183	\$0	\$0
100007.000	CCC Support	Non-Labor	07-Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$0	\$197	\$0
100007.000	CCC Support	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$126	\$146	\$0	\$0	\$35
100007.000	CCC Support	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$4,263	\$0
100007.000	CCC Support	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$3,256	\$271	\$746	\$0	\$104
100007.000	CCC Support	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$236	\$297	\$0	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$0	\$0	\$4,506	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$0	\$910	\$0	\$0	\$41
100007.000	CCC Support	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$88	\$129	\$0	\$848	\$0
100007.000	CCC Support	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$330	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$11	\$0	\$0	\$10	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$52,046	\$0	\$944	\$0	\$21,534
100007.000	CCC Support	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$90	\$0
100007.000	CCC Support	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$1,067	\$0	(\$0)	\$0	\$0
100007.000	CCC Support	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$0	\$0	\$16	\$0	\$0
100007.000	CCC Support	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$0	\$0	\$47	\$0	\$0
100007.000	CCC Support	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$0	\$93,901	\$117,628	\$0	\$0
100007.000	CCC Support	Non-Labor	14-Contract Services	6220006	SRV-C/SVC DEPT ONLY	\$0	\$5	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	05-Employee Related	6220022	SRV-PRE-EMP BKGR CHK	\$0	\$0	(\$10,604)	\$0	\$0
100007.000	CCC Support	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$356	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$2,196	\$8,284	\$1,506	\$102	\$0
100007.000	CCC Support	Non-Labor	09-Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$0	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	(\$24,500)	\$468,676	\$344,108	\$488,377	\$516,732
100007.000	CCC Support	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$0	\$187	\$0	\$4,325	\$0
100007.000	CCC Support	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$2,063	\$582	\$0	\$0
100007.000	CCC Support	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$45	\$1,361	\$1,519	\$0	\$100
100007.000	CCC Support	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$0	\$36	\$0	\$0	\$59,730
100007.000	CCC Support	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$4,826	\$389	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$0	(\$483)	\$6,510	\$0	\$0
100007.000	CCC Support	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$1,373	\$483	\$270	\$425	\$725
100007.000	CCC Support	Non-Labor	17-Purchased Services	6220842	SRV-VEH REPAIR & MNT	\$954	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$177	\$663	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6220990	SRV-CMPTR HW MNT&LS	\$0	\$0	\$101,945	\$0	\$0
100007.000	CCC Support	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$194,702	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$817	\$541	\$675	\$0	\$0
100007.000	CCC Support	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$271	\$2,475	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$658	\$0	\$0	\$0	\$0
100007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$44,921	\$49,724	\$49,710	\$41,754	\$32,905
100007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$599,994	\$572,870	\$456,372	\$354,377	\$374,475

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					Fiscal year	2009	2010	2011	2012	2013
10007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$4,892	\$2,677	\$328	\$353	\$346
10007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$52,675	\$33,729	\$13,924	\$28	\$55
10007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$226	\$132	\$153	\$107	\$0
10007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320008	TELE-DATA (NORTH)	\$0	\$4,912	\$0	\$0	\$0
10007.000	CCC Support	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$133	\$454	\$561
10007.000	CCC Support	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$2)	\$0	\$0	\$0	\$0
10007.000	CCC Support	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$46,384	\$0	\$0	\$0	\$0
10007.000	CCC Support	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$992,749	\$1,251,175	\$1,088,441	\$903,050	\$1,009,070
10007.000	CCC Support	TOTAL		TOTAL ALL		\$2,293,102	\$2,404,848	\$2,388,781	\$2,306,001	\$2,322,514
10008.000	Residential Services	Labor	01-Straight Time Labor	6110010	SAL-EXEC	\$0	\$0	\$0	\$0	\$0
10008.000	Residential Services	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$1,349,892	\$1,129,827	\$1,480,207	\$1,956,973	\$2,106,887
10008.000	Residential Services	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$0	\$1,619	\$5,787	\$4,580	\$3,467
10008.000	Residential Services	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$426	\$2,196	\$391	\$4,119
10008.000	Residential Services	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$98,182	\$94,169	\$96,853	\$103,855	\$69,971
10008.000	Residential Services	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$525	\$100	\$222	\$83	\$101
10008.000	Residential Services	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$413	\$220	\$2,095	(\$254)	\$985
10008.000	Residential Services	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$475	\$0	\$75	\$0	\$0
10008.000	Residential Services	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$10,681	\$0	\$208	\$0	\$0
10008.000	Residential Services	Labor	01-Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$90,762	\$19,885
10008.000	Residential Services	Labor	01-Straight Time Labor	6110142	SAL-EMP CNTR C&T S/T	\$0	\$0	\$0	\$0	\$2,606
10008.000	Residential Services	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$284	\$0	\$0	\$0
10008.000	Residential Services	Labor	01-Straight Time Labor	6110172	SAL-PT TIME C&T S/T	\$0	\$0	\$0	\$423	\$0
10008.000	Residential Services	Labor	02-Overtime Labor T&1/2	6110182	SAL-PT TIME C&T T&H	\$0	\$0	\$0	\$483	\$0
10008.000	Residential Services	Labor	03-Overtime Labor DT	6110192	SAL-PT TIME C&T D/T	\$0	\$0	\$0	\$539	\$0
10008.000	Residential Services	Labor	01-Straight Time Labor	6110231	SAL-CALLIN MGMT S/T	\$0	\$0	\$0	\$0	\$16,811
10008.000	Residential Services	Labor	02-Overtime Labor T&1/2	6110241	SAL-CALLIN MGMT T&H	\$0	\$0	\$0	\$0	\$236
10008.000	Residential Services	Labor	05-Other Labor	6110256	SAL-MISC	\$2,444	\$0	\$9,908	\$0	\$0
10008.000	Residential Services	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$0	\$0	\$0
10008.000	Residential Services	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$225,828	\$195,282	\$235,319	\$312,670	\$352,896
10008.000	Residential Services	Labor		Labor	TOTAL LABOR	\$1,688,441	\$1,421,928	\$1,832,871	\$2,470,505	\$2,577,964
10008.000	Residential Services	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$0	\$20	\$87
10008.000	Residential Services	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$0	\$1,200	\$2,064
10008.000	Residential Services	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$122	\$1,900	\$1,001	\$1,205	\$2,421
10008.000	Residential Services	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$127	\$1,126
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$10,777	\$33,001	\$44,438	\$34,219	\$31,846
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$1,584	\$1,144	\$259	\$246	\$96
10008.000	Residential Services	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$311	\$1,805	\$240	\$1,816	\$6,727
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$452	\$481	\$367	\$433	\$389
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$12,192	\$5,292	\$3,096	\$5,811	\$8,823
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$1,414	\$2,392	\$2,754	\$2,910	\$2,290
10008.000	Residential Services	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$6,640	\$8,341	\$11,411	\$16,224	\$11,844
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$895	\$1,153	\$762	\$1,876	\$2,077
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$2,152	\$4,438	\$5,278	\$4,141	\$1,991
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$13,773	\$22,416	\$29,676	\$21,193	\$14,383
10008.000	Residential Services	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$203	\$8,254
10008.000	Residential Services	Non-Labor	07-Events	6130023	EMP BEN-CORP EVENTS	\$0	\$3,675	\$0	\$0	\$4,582
10008.000	Residential Services	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$261	\$1,264	\$1,301	\$60	\$26
10008.000	Residential Services	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$0	\$0	\$0	\$2,703	\$913
10008.000	Residential Services	Non-Labor	12-Other Materials	6211380	MATL-ELECTRIC PARTS	\$0	\$0	\$0	\$0	\$206
10008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$96	\$38	\$0	\$4,828	\$316

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
100008.000	Residential Services	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$0	\$0	\$520	\$0	\$0
100008.000	Residential Services	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$11,019	\$8,038	\$12,540	\$10,890	\$7,192
100008.000	Residential Services	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$272	\$0	\$83	\$0	\$389
100008.000	Residential Services	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$1,012	\$2,993	\$444	\$102	\$1,504
100008.000	Residential Services	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$424	\$261	\$0	\$61	\$138
100008.000	Residential Services	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$30	\$51	\$236	\$60	\$0
100008.000	Residential Services	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$7,781	\$2,000	\$2,500	\$5,364	\$1,076
100008.000	Residential Services	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$165	\$95	\$234	\$182
100008.000	Residential Services	Non-Labor	12-Other Materials	6213040	MATL-GAS FUEL	\$0	\$0	\$1,403	\$101	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6213060	MATL-VEHICLE PARTS	\$0	\$27	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$8,577	\$7,426	\$3	\$6,376	\$17,645
100008.000	Residential Services	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$776	\$801	\$0	\$141	\$328
100008.000	Residential Services	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$288	\$111	\$0	\$1,522	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$649	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$4,674	\$3,945	\$3,037	\$6,561	\$7,076
100008.000	Residential Services	Non-Labor	12-Other Materials	6213325	MATL-HARDWARE	\$0	\$0	\$0	\$8,791	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$1,202	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6213475	MATL-PRINT-BROCHURES	\$418	\$484	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$2,852	\$0	\$2,177	\$38,735	\$1,859
100008.000	Residential Services	Non-Labor	12-Other Materials	6213490	MATL-APPAREL	\$2,271	\$0	\$771	\$1,806	\$5,785
100008.000	Residential Services	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$138	\$190	\$172	\$0	\$0
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$16,016	\$0	\$295	\$0	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6213680	MATL-CUSTOMER EVENT	\$1,441	\$74	\$83	\$7,095	\$297
100008.000	Residential Services	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$0	\$0	\$0	\$0	\$4
100008.000	Residential Services	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$0	\$0	\$20	\$0	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$0	\$53	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$74	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$383	\$21,369	\$12,619	\$23,151	\$12,263
100008.000	Residential Services	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$94,216	\$20,385	\$564	\$704	\$139,362
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6220005	SRV-CONTR-MAJOR PROJ	\$0	\$0	\$0	\$0	\$66,974
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6220008	SRV-CONTRACTORS	\$0	\$0	\$14	\$1,676	\$44,328
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$429	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$102	\$0	\$17,487	\$3,459	\$12,575
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220045	SRV-LOGO MERCHANDISG	\$0	\$0	\$0	\$0	\$2,060
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$280,712	\$180,136	\$206,193	\$202,182	\$162,455
100008.000	Residential Services	Non-Labor	16-Market Research	6220051	MARKET RESEARCH	\$20,440	\$0	\$67,521	\$92,765	\$88,759
100008.000	Residential Services	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$11,957	\$5,509	\$9,735	\$51,013	\$78,031
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$11,256	\$89,564	\$56,979	(\$31)	\$2,486
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$0	\$649	\$0	\$6,601	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220110	SRV-TELEVISION ADVERT	\$0	\$0	\$0	\$0	\$77,135
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220130	SRV-RADIO ADVERTISING	\$0	\$12,572	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$745	\$21,026	\$6,211	\$2,479	\$15,589
100008.000	Residential Services	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$4,010	\$12,604	\$29,466	\$31,626	\$0
100008.000	Residential Services	Non-Labor	10-Computer Related	6220270	SRV-IT-CONSULTING	\$0	\$0	\$0	\$15,266	\$33,932
100008.000	Residential Services	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FFLMT	\$366	\$747	\$2,747	\$724	\$543
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$68,807	\$24,573	\$58,171	\$12,788	\$97,156
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$43,896	\$41,228	\$107,718	\$77,162	\$137,533
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$0	\$1,236	\$2,856	\$1,400
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$4,602	\$391	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$68	\$73	\$124	\$151	\$257

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$0	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220403	SRV-PRINTNG ENVLOPES	\$0	\$0	\$0	\$30	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$33,722	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$0	\$0	\$119	\$256
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$346	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$1,393	\$5,643	\$4,845	\$4,622	\$11,081
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$6,940	\$0	\$0	\$3,495
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$31,152	\$38,165	\$44,541	\$14,958	\$12,127
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$11	\$0	\$34	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$9,980	\$7,096	\$4,830	\$2,878	\$18,653
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6220470	SRV-MAIL OTHER	\$0	\$0	\$0	\$0	\$1,619
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6220480	SRV-ENGINEERING	\$1,961	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$203	\$58,558	\$41,049	\$91,404	\$81,402
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$6,204	\$500	\$1,304	\$1,106	\$7,815
100008.000	Residential Services	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$466,366	\$46,299	\$91,218	\$143,384	\$132,308
100008.000	Residential Services	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$10,950	\$11,586	\$15,990	\$41,984	\$11,400
100008.000	Residential Services	Non-Labor	23-Misc NL Costs	6220800	SRV-CONSERVATION	\$325,046	\$370,264	\$261,156	\$340,395	\$292,397
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220810	SRV-CUSTOMER SERVCS	\$31,316	\$49,540	\$21,468	\$0	\$842,061
100008.000	Residential Services	Non-Labor	07-Events	6220811	SRV-CUSTOMER EVENT	\$0	\$0	\$8,839	\$28,417	\$22,558
100008.000	Residential Services	Non-Labor	07-Events	6220812	SRV-BUS & CIVIC MTGS	\$0	\$2,157	\$0	\$0	\$23,820
100008.000	Residential Services	Non-Labor	07-Events	6220813	SRV-SPNSR BUS & CVC	\$2,763	\$27,022	\$75,312	\$76,170	\$85,919
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$5,964	\$0	\$0	\$0	\$2,700
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220846	SRV-VEHICLE TOWING	\$2,432	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$0	\$0	\$0	\$0	\$364
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6220870	SRV-PHONE&COMMUN SYS	\$16	\$505	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$111	\$216	\$156	\$254	\$100
100008.000	Residential Services	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$984	\$1,905	\$251	\$2,513	\$754
100008.000	Residential Services	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$76,407	\$76,148	\$52,149	\$75,938	\$34,135
100008.000	Residential Services	Non-Labor	07-Events	6221070	SRV-CORP EVNT VENDOR	\$0	\$0	\$2,105	\$0	\$0
100008.000	Residential Services	Non-Labor	07-Events	6221071	SRV-CORP EVENT INHSE	\$4,495	\$0	\$0	\$677	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6230040	SRV-ADVERTISING	\$2,495	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$0	\$674	\$1,729	\$1,955
100008.000	Residential Services	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$208	\$51	\$0
100008.000	Residential Services	Non-Labor	09-Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$14,184	(\$2,437)	\$0	\$0	\$3,516
100008.000	Residential Services	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$47	\$875	\$1,367	\$1,070	\$1,040
100008.000	Residential Services	Non-Labor	05-Employee Related	6230550	SRV-RECRUITING	\$0	\$0	\$0	\$298	\$0
100008.000	Residential Services	Non-Labor	05-Employee Related	6230553	SRV-RECRUITING JB FR	\$2,763	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$0	\$0	\$0	\$721	\$0
100008.000	Residential Services	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$308	\$1,839	\$826	\$2,915
100008.000	Residential Services	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$0	\$336	\$5,798	\$86	\$510
100008.000	Residential Services	Non-Labor	17-Purchased Services	6230830	SRV-LANGUAGE SRVS	\$221	\$0	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$73,531	\$156,454	\$134,671	\$271,091	\$271,779
100008.000	Residential Services	Non-Labor	20-Dues	6250002	DUES-SOCIAL	\$133	\$470	\$134,110	\$46,207	\$98
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$325	\$508	\$46	\$0	\$0
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$633	\$462	\$249	\$2,615	\$2,157
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$9,768	\$12,328	\$8,199	\$12,042	\$11,412
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$1,290	\$796	\$1,179	\$488	\$273
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$0	\$135	\$63	\$0	\$0
100008.000	Residential Services	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$3,121	\$0	\$0	\$0
100008.000	Residential Services	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$2)	\$0	\$0	\$0	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100008.000	Residential Services	Non-Labor	23-Misc NL Costs	6350710	CREDIT FOR CASH COLL	\$0	\$0	\$0	(\$253,900)	\$0
100008.000	Residential Services	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$0	\$0	\$0	\$14,668	\$0
100008.000	Residential Services	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$1,768,273	\$1,421,843	\$1,615,362	\$1,634,849	\$2,997,392
100008.000	Residential Services				TOTAL ALL	\$3,456,714	\$2,843,771	\$3,448,233	\$4,105,354	\$5,575,356
100009.000	C&I Services	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$3,756,153	\$3,675,179	\$3,531,512	\$3,662,405	\$3,436,444
100009.000	C&I Services	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$5,473	\$2,723	\$2,078	\$5,113	\$9,609
100009.000	C&I Services	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$3,100	\$824	\$926	\$3,131	\$974
100009.000	C&I Services	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$198,819	\$174,428	\$182,645	\$205,114	\$217,229
100009.000	C&I Services	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$169	\$233	\$1,663	\$2,261	\$503
100009.000	C&I Services	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$803	\$0	\$310	\$80	\$34
100009.000	C&I Services	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$114	\$0	\$676	\$0
100009.000	C&I Services	Labor	02-Overtime Labor T&1/2	6110120	SAL-UNION T&1/2	\$0	\$0	\$0	\$254	\$0
100009.000	C&I Services	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$19,598	\$11,600	\$0	\$0	\$0
100009.000	C&I Services	Labor	01-Straight Time Labor	6110170	SAL-TEMP P-T S/T	\$0	\$11,135	\$0	\$0	\$0
100009.000	C&I Services	Labor	02-Overtime Labor T&1/2	6110180	SAL-TEMP P-T T&1/2	\$0	\$106	\$0	\$0	\$0
100009.000	C&I Services	Labor	01-Straight Time Labor	6110231	SAL-CALLIN MGMT S/T	\$0	\$0	\$0	\$0	\$134,971
100009.000	C&I Services	Labor	02-Overtime Labor T&1/2	6110241	SAL-CALLIN MGMT T&H	\$0	\$0	\$0	\$0	\$3,078
100009.000	C&I Services	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$6,333	\$12,184	\$2,228	\$9,923
100009.000	C&I Services	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$53,792	\$23,675	\$0	\$0
100009.000	C&I Services	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$2,696	\$2,554	\$0
100009.000	C&I Services	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$615,147	\$626,686	\$553,508	\$562,765	\$604,705
100009.000	C&I Services	Labor		Labor	TOTAL LABOR	\$4,599,261	\$4,563,153	\$4,311,197	\$4,446,581	\$4,417,470
100009.000	C&I Services	Non-Labor	05-Employee Related	6120041	EMP BEN-RELOCROSSUP	\$0	\$0	\$762	\$0	\$0
100009.000	C&I Services	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$60	\$79	\$88
100009.000	C&I Services	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$553	\$1,876	\$2,838	\$1,141	\$505
100009.000	C&I Services	Non-Labor	05-Employee Related	6120146	EMP BEN-ATTENDANCE	\$0	\$0	\$0	\$0	\$120
100009.000	C&I Services	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$108	\$436	\$727	\$1,218
100009.000	C&I Services	Non-Labor	05-Employee Related	6130000	EMP BEN-EXPENSES	\$0	\$378	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$15,449	\$17,702	\$25,559	\$16,185	\$4,748
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$320	\$191	\$33	\$69	\$182
100009.000	C&I Services	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$1,837	\$3,487	\$15,199	\$11,263	\$4,119
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$194	\$259	\$402	\$182	\$134
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$56,269	\$36,040	\$28,815	\$29,658	\$28,613
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$2,932	\$3,106	\$2,650	\$3,013	\$1,662
100009.000	C&I Services	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$24,649	\$21,464	\$18,482	\$19,103	\$15,721
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$474	\$319	\$706	\$1,164	\$559
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$1,852	\$3,350	\$2,767	\$1,158	\$611
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$23,752	\$20,801	\$24,479	\$24,113	\$11,075
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$388	\$0	\$781	\$0	\$0
100009.000	C&I Services	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$826	\$0
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$3,818	\$971	\$746	\$2,641	\$3,473
100009.000	C&I Services	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$839	\$684	\$702	\$815	\$367
100009.000	C&I Services	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$0	\$0	\$105	\$0	\$0
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$0	\$1,960	\$0	\$804	\$0
100009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$465	\$958	\$1,198	\$536	\$2,678
100009.000	C&I Services	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$0	\$0	\$2,468	\$0	\$11,647
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$46,492	\$38,068	\$31,016	\$31,774	\$21,152
100009.000	C&I Services	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$0	\$223	\$0	\$0
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$1,385	\$2,151	\$2,027	\$3,824	\$3,468
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$68	\$229	\$0	\$406	\$361

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
10009.000	C&I Services	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$116	\$348	\$825	\$1,020
10009.000	C&I Services	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$30,873	\$4,107	\$3,521	\$3,455	\$4,600
10009.000	C&I Services	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$17	\$0	\$83	\$0	\$25
10009.000	C&I Services	Non-Labor	12-Other Materials	6213060	MATL-VEHICLE PARTS	\$0	\$0	\$0	\$954	\$0
10009.000	C&I Services	Non-Labor	12-Other Materials	6213080	MATL-REPAIR PARTS	\$0	\$0	\$89	\$0	\$0
10009.000	C&I Services	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$2,474	\$1,431	\$1,715	\$414	\$3,164
10009.000	C&I Services	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$756	\$391	\$999	\$2,965
10009.000	C&I Services	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$696	\$141	\$0	\$8,086	\$0
10009.000	C&I Services	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$17,760	\$8,282	\$7,757	\$4,736	\$9,015
10009.000	C&I Services	Non-Labor	12-Other Materials	6213360	MATL-LOCKS	\$0	\$0	\$23	\$0	\$0
10009.000	C&I Services	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$197	\$0	\$22	\$1,212	\$1,437
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6213480	MATL-PROMOTNLN ITEMS	\$4,024	(\$1,968)	\$5,248	\$2,828	\$1,116
10009.000	C&I Services	Non-Labor	12-Other Materials	6213490	MATL-APPAREL	\$0	\$1,389	\$6,855	\$0	\$942
10009.000	C&I Services	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$2,382	\$180	\$2,139
10009.000	C&I Services	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$11,163	\$141	\$240	\$0	\$0
10009.000	C&I Services	Non-Labor	12-Other Materials	6213680	MATL-CUSTOMER EVENT	\$26,025	\$9,553	\$6,937	\$7,996	\$270
10009.000	C&I Services	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$3,555	\$2,509	\$3,218	\$4,773	\$2,624
10009.000	C&I Services	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$69	\$0	\$122	\$98	\$11
10009.000	C&I Services	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$3	\$3	\$18	\$127	\$131
10009.000	C&I Services	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$0	\$103	\$428	\$113	\$247
10009.000	C&I Services	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$10	\$0	\$138	\$169	\$579
10009.000	C&I Services	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$37	\$17	\$0	\$4	\$26
10009.000	C&I Services	Non-Labor	12-Other Materials	6215105	MI-ORANGE COUNTY WRH	\$156	\$0	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$0	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$0	\$0	\$12,619	\$0	\$12,263
10009.000	C&I Services	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$2,490	\$2,293	\$39,420	\$206,504	\$47,673
10009.000	C&I Services	Non-Labor	15-Supplemental Workforce	6220008	SRV-CONTRACTORS	\$133	\$0	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220045	SRV-LOGO MERCHANDISG	\$0	\$288	\$0	\$0	\$200
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$16,180	\$15,596	\$75,043	(\$2,250)	\$58,758
10009.000	C&I Services	Non-Labor	16-Market Research	6220051	MARKET RESEARCH	\$39,878	\$44,532	\$114,153	\$133,201	\$97,300
10009.000	C&I Services	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$33,097	\$34,078	\$23,673	\$45,958	\$16,886
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$0	\$2,623	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	17-Purchased Services	6220200	SRV-LEGAL	\$0	\$0	\$2,389	\$0	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$0	\$0	\$2,993	\$0	\$1,346
10009.000	C&I Services	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$0	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	10-Computer Related	6220270	SRV-IT-CONSULTING	\$0	\$0	\$0	\$0	\$3,620
10009.000	C&I Services	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FFLMT	\$1,911	\$1,120	\$2,177	\$1,634	\$533
10009.000	C&I Services	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGNCY LABOR	\$264	\$19,875	\$18,290	\$62,896	\$223,970
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$8,104	\$5,143	\$626	\$509	\$32,754
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$0	\$559	\$0	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220393	SRV-BUS FRMS SPC ORD	\$0	\$0	\$0	\$0	\$972
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$10,387	\$1,341	\$12,594	\$25,216	\$25,613
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$1,813	\$1,012	\$1,009	\$795	\$1,713
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$3,190	\$0	\$1,273	\$467	\$476
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220403	SRV-PRINTNG ENVLOPES	\$130	\$178	\$145	\$0	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$291	\$616	\$0	\$0	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$0	\$0	\$0	\$85	\$249
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$480	\$0
10009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$7,968	\$7,170	\$11,902	\$11,184	\$10,873
10009.000	C&I Services	Non-Labor	17-Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$3,831	\$0	\$0	\$1,379

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					Fiscal year	2009	2010	2011	2012	2013
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$3,421	\$17,047	\$12,379	\$6,331	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$22	\$555	\$49	\$18	\$40
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$5,355	\$4,160	\$27,309	\$11,625	\$7,237
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220500	SRV-GOV T/K-DSGN/BLD	\$0	\$0	\$887	\$0	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220535	SRV-GOVT PERMITS	\$0	\$0	\$0	\$0	\$3,758
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$213	\$260	\$283	\$232	\$9,653
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$2,398	\$1,652	\$2,688	\$2,572	\$913
100009.000	C&I Services	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$17,187	\$341	\$1,016	\$0	\$0
100009.000	C&I Services	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$66,712	\$38,830	\$82,599	\$53,747	\$46,994
100009.000	C&I Services	Non-Labor	07-Events	6220811	SRV-CUSTOMER EVENT	\$28,174	\$8,325	\$20,578	\$21,921	\$8,466
100009.000	C&I Services	Non-Labor	07-Events	6220812	SRV-BUS & CIVIC MTGS	\$0	\$0	\$5,194	\$0	\$0
100009.000	C&I Services	Non-Labor	07-Events	6220813	SRV-SPNSR BUS & CVC	\$0	\$0	\$9,089	\$9,323	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$0	\$70	\$112	\$0	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220855	SRV-UNIFRM LNDRY/RNT	\$400	\$512	\$559	\$773	\$774
100009.000	C&I Services	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$442	\$216	\$312	\$895	\$150
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$1,756	\$925	\$1,262	\$4,636	\$1,630
100009.000	C&I Services	Non-Labor	11-Office/Furn Supplies	6220980	SRV-JANITORIAL	\$0	\$294	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$0	\$173	\$4,021	\$263	\$4,830
100009.000	C&I Services	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$29,757	\$17,819	\$20,343	\$21,039	\$22,250
100009.000	C&I Services	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$104	\$0	\$0
100009.000	C&I Services	Non-Labor	09-Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$6,163	\$7,455	\$170	\$195	\$7,814
100009.000	C&I Services	Non-Labor	07-Events	6230500	SRV-SAFETY EVENT	\$553	\$0	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$1,723	\$0	\$3,353
100009.000	C&I Services	Non-Labor	05-Employee Related	6230550	SRV-RECRUITING	\$0	\$0	\$914	\$0	\$0
100009.000	C&I Services	Non-Labor	05-Employee Related	6230551	SRV-RECRUITING COLLE	\$0	\$0	\$1,143	\$0	\$0
100009.000	C&I Services	Non-Labor	05-Employee Related	6230552	SRV-RECRUITING MATL	\$75	\$195	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	05-Employee Related	6230553	SRV-RECRUITING JB FR	\$1,382	\$1,148	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	05-Employee Related	6230554	SRV-RECRUITING WEB	\$0	\$0	\$153	\$0	\$0
100009.000	C&I Services	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$849	\$0	\$4,155	\$2,275	\$0
100009.000	C&I Services	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$16,582	\$24,722	\$2,107	\$2,516	\$1,500
100009.000	C&I Services	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$2,287	\$800	\$1,776	\$4,498	\$1,039
100009.000	C&I Services	Non-Labor	07-Events	6230681	SRV-EV & TKT-CHGBK	\$2,531	\$4,159	\$2,602	\$3,796	\$0
100009.000	C&I Services	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$12,182	\$40,103	\$107,323	\$76,454	\$38,649
100009.000	C&I Services	Non-Labor	21-Customer Refunds	6290400	MISC REIMBURSEMENTS	\$0	\$25,478	\$1,889	\$0	\$8,265
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$484	\$600	\$558	\$490	\$565
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$224	\$3,404	\$285	\$1,827	\$0
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$59,976	\$58,722	\$58,892	\$60,035	\$39,819
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$0	\$0	\$22	\$0	\$0
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$1,555	\$582	\$550	\$114	\$0
100009.000	C&I Services	Non-Labor	18-Telephone Expenses	6320005	TELE-PBX SERVICES	\$0	\$1	\$2	\$1	\$0
100009.000	C&I Services	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$6)	\$0	\$0	\$0	\$0
100009.000	C&I Services	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$0	\$0	\$0	(\$239)	\$0
100009.000	C&I Services	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$665,303	\$578,927	\$893,902	\$958,466	\$887,088
100009.000	C&I Services		TOTAL	TOTAL ALL		\$5,264,564	\$5,142,080	\$5,205,099	\$5,405,048	\$5,304,559
100010.000	Communications & Research	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$1,455,507	\$1,200,622	\$1,659,231	\$2,091,368	\$1,853,260
100010.000	Communications & Research	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$619	\$0	\$784	(\$256)	\$0
100010.000	Communications & Research	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$3,814	\$0	\$314	(\$103)	\$0
100010.000	Communications & Research	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$52,061	\$16,071	\$50,205	\$47,951	\$48,868
100010.000	Communications & Research	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$188	\$639	\$0	\$0	\$0
100010.000	Communications & Research	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$458	\$168	\$0	\$0	\$0

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					Fiscal year	2009	2010	2011	2012	2013
100010.000	Communications & Research	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$75,326	\$37,513	\$73,332	\$0	\$0
100010.000	Communications & Research	Labor	01-Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$28,487	\$0
100010.000	Communications & Research	Labor	05-Other Labor	6110256	SAL-MISC	\$2,027	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$12,596	\$0	\$0	\$0
100010.000	Communications & Research	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$3,258	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$245,999	\$201,803	\$262,763	\$314,063	\$301,677
100010.000	Communications & Research	Labor	Labor	Labor	TOTAL LABOR	\$1,839,258	\$1,469,412	\$2,046,628	\$2,481,510	\$2,203,804
100010.000	Communications & Research	Non-Labor	05-Employee Related	6120000	EMPLOYEE BENEFITS	\$0	\$0	\$0	\$0	\$33
100010.000	Communications & Research	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$530	\$1,016	\$425
100010.000	Communications & Research	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$324	\$493	\$0	\$0
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$9,274	\$2,923	\$2,051	\$4,680	\$3,403
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$221	\$821	\$5,699	\$453	\$95
100010.000	Communications & Research	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$87	\$0	\$0	\$1,307	\$1,893
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$9	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$9,143	\$2,526	\$3,540	\$1,681	\$1,502
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130013	EMP TRVL-PER DIEM	\$241	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$879	\$445	\$450	\$983	\$358
100010.000	Communications & Research	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$9,388	\$1,753	\$2,854	\$2,704	\$1,090
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$306	\$0	\$0	\$730	\$0
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$1,831	\$309	\$123	\$642	\$580
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$11,187	\$3,451	\$4,216	\$10,120	\$7,351
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$215	\$0
100010.000	Communications & Research	Non-Labor	07-Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$0	\$53	\$0
100010.000	Communications & Research	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$153	\$40	\$117	\$0
100010.000	Communications & Research	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$31,876	\$37,344	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6211265	MATL-FIRST AID SUPPL	\$0	\$0	\$598	\$0	\$0
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$0	\$880	\$2,786	\$1,100	\$1,728
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$3,348	\$13	\$124	\$0	\$0
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$9,499	\$7,236	\$2,365	\$7,071	\$1,142
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$0	\$0	\$812	\$0
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$91	\$0	\$0
100010.000	Communications & Research	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$70	\$7,092	\$105	\$111
100010.000	Communications & Research	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$8,558	\$19,506	\$4,804	\$9,376	\$19,792
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$3,567	\$389	\$569	\$5,787	\$3,118
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$822	\$55,499	\$42,324	\$16,810	\$120
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$746	\$0	\$496	\$0	\$0
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$44	\$708	\$687	\$196	\$0
100010.000	Communications & Research	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$2,606	\$2,708	\$21,842	\$1,852	\$2,961
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$0	\$35	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$0	\$1,359	\$0
100010.000	Communications & Research	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$113,384	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	12-Other Materials	6213590	MATL-JANITORIAL SUPP	\$0	\$0	\$73	\$0	\$0
100010.000	Communications & Research	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$0	\$0	\$22	\$0	\$0
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$29,930	\$88,905	\$99,423	\$97,990	\$46,529
100010.000	Communications & Research	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$4,004	\$1,582	\$32,822	\$842	\$332
100010.000	Communications & Research	Non-Labor	15-Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$5,471	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	15-Supplemental Workforce	6220008	SRV-CONTRACTORS	\$0	\$0	\$0	\$1,909	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$215,310	\$120,307	\$124,984	\$215,275	\$179,418
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220045	SRV-LOGO MERCHANDISG	\$0	\$0	\$416	\$0	\$0

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					Fiscal year	2009	2010	2011	2012	2013
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$1,038,805	\$509,468	\$1,277,921	\$1,622,258	\$1,582,830
100010.000	Communications & Research	Non-Labor	16-Market Research	6220051	MARKET RESEARCH	\$902,639	\$647,926	\$935,148	\$847,625	\$1,099,550
100010.000	Communications & Research	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$6,829	\$2,374	\$5,213	\$7,928	\$83,779
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$266,035	\$626,211	\$267,143	\$665,600	\$515,772
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220090	SRV-MAGAZINE ADVERTI	\$4,441	\$0	\$159	\$0	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220110	SRV-TELEVISION ADVERT	\$0	\$56,433	\$296,542	\$1,043,209	\$673,464
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220130	SRV-RADIO ADVERTISING	\$279,854	\$191,517	\$176,958	\$529,140	\$302,900
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$150,619	\$1,189	\$13,698	(\$819)	\$2,000
100010.000	Communications & Research	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$52,908	\$0	\$0	\$200
100010.000	Communications & Research	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$565	\$4,133	\$1,834	\$0	\$726
100010.000	Communications & Research	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGNCY LABOR	\$9,180	\$2,730	\$36,891	\$9,478	\$110,762
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$342,018	\$226,249	\$127,935	\$267,980	\$210,163
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220391	SRV-GRAPHICS-VENDOR	\$0	\$1,946	\$29,598	\$54,872	\$151,586
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$180	\$38	\$0	\$57	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$26,228	\$0	\$0	\$384	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220421	SRV-COPY-ENGINEERING	\$565	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$7,316	\$649	\$249	\$153	\$1,182
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$92,493	\$37,141	\$27,700	\$12,822	\$27,849
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$0	\$0	\$0	\$788
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$269,992	\$15,855	\$10,580	\$0	\$31,370
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220570	SRV-DESIGN	\$4,766	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$181,238	\$295,574	\$85,275	\$245,250	\$611,644
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$9	\$190	\$0	\$15	\$0
100010.000	Communications & Research	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$223,048	\$85,291	\$987	\$0	\$139
100010.000	Communications & Research	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$12,301	\$10,474	\$4,222	\$17,805	\$33,535
100010.000	Communications & Research	Non-Labor	07-Events	6220811	SRV-CUSTOMER EVENT	\$386,843	\$16,213	\$0	\$10,156	\$0
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220830	SRV-SOCAL BILLINGS	\$0	\$0	\$0	\$2,234	\$0
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$0	\$0	\$296	\$0	\$364
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$55	\$652	\$0	\$0	\$50
100010.000	Communications & Research	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$8,989	\$13,552	\$504	\$482	\$815
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$1,929	\$8,823	\$1,278	\$1,254	\$2,128
100010.000	Communications & Research	Non-Labor	07-Events	6221070	SRV-CORP EVNT VENDOR	\$0	\$0	\$5,713	\$0	\$0
100010.000	Communications & Research	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$1,956	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	09-Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$5,879	\$5,120	(\$85)	\$7,617	\$0
100010.000	Communications & Research	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	05-Employee Related	6230550	SRV-RECRUITING	\$0	\$0	\$0	\$179	\$0
100010.000	Communications & Research	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$221	\$0	\$0	\$782	\$800
100010.000	Communications & Research	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$5,012	\$5,069	\$1,960	\$7,587	\$0
100010.000	Communications & Research	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$2,442	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$0	\$0	\$398	\$0	\$3,330
100010.000	Communications & Research	Non-Labor	20-Dues	6250002	DUES-SOCIAL	\$0	\$310	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$18,283	\$400	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$14,890	\$30,183	\$18,767	\$21,929	\$16,654
100010.000	Communications & Research	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$3	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$0	\$118	\$268	\$92	\$0
100010.000	Communications & Research	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$1,315)	\$0	\$0	\$0	\$0
100010.000	Communications & Research	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$2,280	\$0	\$0	\$3,195	\$0
100010.000	Communications & Research	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$4,738,314	\$3,196,633	\$3,688,665	\$5,764,451	\$5,736,360
100010.000	Communications & Research	TOTAL		TOTAL ALL		\$6,577,572	\$4,666,045	\$5,735,293	\$8,245,962	\$7,940,164
100011.000	Customer Programs & Projects	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$748,170	\$772,642	\$835,278	\$1,229,877	\$1,132,845

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100011.000	Customer Programs & Projects	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$35	\$0	\$0	\$67	\$0
100011.000	Customer Programs & Projects	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$0	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$30,912	\$27,385	\$14,064	\$20,500	\$13,673
100011.000	Customer Programs & Projects	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$1,369	\$15	\$108	\$377	\$0
100011.000	Customer Programs & Projects	Labor	03-Overtime Labor DT	6110100	SAL-CLERICAL/TECH DT	\$1,112	\$0	\$0	\$543	\$0
100011.000	Customer Programs & Projects	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	(\$2,631)	\$10	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Labor	01-Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$0	\$51,615
100011.000	Customer Programs & Projects	Labor	01-Straight Time Labor	6110142	SAL-EMP CNTR C&T S/T	\$0	\$0	\$0	\$0	\$127
100011.000	Customer Programs & Projects	Labor	02-Overtime Labor T&1/2	6110150	SAL-TEMP F-T T&1/2	\$445	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Labor	03-Overtime Labor DT	6110252	SAL-CALLIN C&T D/T	\$0	\$0	\$0	\$0	\$322
100011.000	Customer Programs & Projects	Labor	05-Other Labor	6110256	SAL-MISC	\$4,263	\$0	\$1,061	\$7,163	\$19,591
100011.000	Customer Programs & Projects	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$0	\$0	\$0	\$0	\$660
100011.000	Customer Programs & Projects	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$12,761	\$0	\$10,216	\$5,000
100011.000	Customer Programs & Projects	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$120,999	\$129,400	\$125,280	\$183,841	\$194,100
100011.000	Customer Programs & Projects	Labor	Labor	Labor	TOTAL LABOR	\$904,673	\$942,213	\$975,790	\$1,452,583	\$1,417,932
100011.000	Customer Programs & Projects	Non-Labor	05-Employee Related	6120000	EMPLOYEE BENEFITS	\$390	\$552	\$0	\$0	\$28
100011.000	Customer Programs & Projects	Non-Labor	05-Employee Related	6120053	EMP BEN-MISC	\$0	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	05-Employee Related	6120093	EMP BEN-PREP F/MGMT	\$0	\$0	\$181	\$333	\$77
100011.000	Customer Programs & Projects	Non-Labor	03-Employee Recognition	6120112	EMP BEN-SAF RECOGNI	\$0	\$0	\$0	\$765	\$0
100011.000	Customer Programs & Projects	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$1,109	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$111	\$546	\$639	\$3,384	\$711
100011.000	Customer Programs & Projects	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$88	\$51	\$0
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$1,689	\$5,161	\$8,540	\$14,789	\$16,791
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$485	\$659	\$480	\$422	\$519
100011.000	Customer Programs & Projects	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$737	\$2,045	\$3,797	\$3,361	\$9,209
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$617	\$6	\$56	\$150	\$91
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$7,624	\$4,863	\$4,140	\$3,690	\$2,715
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$349	\$556	\$771	\$1,441	\$1,097
100011.000	Customer Programs & Projects	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$3,686	\$1,215	\$3,366	\$5,273	\$3,150
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	(\$1,835)	\$506	\$92	\$589
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$356	\$405	\$842	\$2,098	\$3,000
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$4,426	\$5,950	\$6,287	\$11,774	\$9,636
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6130022	EMP BEN-CORP SRV	\$0	\$0	\$0	\$203	\$476
100011.000	Customer Programs & Projects	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$4	(\$306)	\$31	\$12	\$53
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6210000	PURCHASED MATERIALS	\$902	\$3,101	\$1,074	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6211380	MATL-ELECTRIC PARTS	\$32	\$0	\$2,525	\$0	\$269
100011.000	Customer Programs & Projects	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$0	\$0	\$31	\$0	\$140
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$773	\$37	\$179	\$270	\$813
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6211500	MATL-SAFETY EVENT	\$6	\$0	\$0	\$0	\$1,530
100011.000	Customer Programs & Projects	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$4,553	\$3,875	\$4,095	\$4,614	\$2,972
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213010	MATL-PCARD/FIELD CD	\$0	\$2,876	\$141	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$1,575	\$5,648	\$1,049	\$0	\$2,299
100011.000	Customer Programs & Projects	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$45	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$17,274	\$1,693	\$404	\$253	\$995
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$2,138	\$2,934	\$34,928	\$25,960	\$5,470
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$0	\$10	\$12	\$351
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$4,353	\$26	\$4,204	\$43,248	\$6,102
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213090	MATL-FREIGHT	\$0	\$0	\$0	\$64	\$86
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$0	\$0	\$0	\$30
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$0	\$0	\$192	\$0	\$0

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Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$216	\$691	\$148	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213140	MATL-BUILDING MATERI	\$0	\$0	\$197	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$80,477	\$23,115	\$10,549	\$34,869	\$32,017
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213305	MATL-GASKETS	\$0	\$63	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213365	MATL-MEASURMT INSTRU	\$0	\$0	\$0	\$294	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213385	MATL-ELEC MISC	\$0	\$0	\$0	\$365	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$982	\$12	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6213480	MATL-PROMOTNL ITEMS	\$1,660	\$0	\$0	\$1,273	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213490	MATL-APPAREL	\$1,440	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$12	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$0	\$1,263	\$0	\$1,062
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213590	MATL-JANITORIAL SUPP	\$0	\$0	\$0	\$0	\$698
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6213680	MATL-CUSTOMER EVENT	\$1,269	\$551	\$104	\$38	\$540
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$1,441	\$290	\$1,018	\$323	\$230
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215075	MI-NORTHCOAST WRHSE	\$204	\$158	\$170	\$14	\$17
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215080	MI-NORTHEAST WRHSE	\$37	\$0	\$0	\$20	\$42
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215085	MI-BEACH CITIES WRHS	\$29	\$0	\$772	\$69	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215090	MI-METRO WRHSE	\$0	\$36	\$62	\$162	\$19
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	(\$0)	\$71	\$43	\$0	\$30
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215105	MI-ORANGE COUNTY WRH	\$0	\$0	\$23	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$38	\$22	\$7	\$293	\$29
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$111	\$0	\$43	\$69,888	\$338,083
100011.000	Customer Programs & Projects	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$36,259	\$3,671	\$2,239	\$1,110	\$2,844
100011.000	Customer Programs & Projects	Non-Labor	15-Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$108	\$0	\$0	\$120,856	\$102,580
100011.000	Customer Programs & Projects	Non-Labor	15-Supplemental Workforce	6220008	SRV-CONTRACTORS	\$0	\$0	\$0	\$16,751	\$53,463
100011.000	Customer Programs & Projects	Non-Labor	15-Supplemental Workforce	6220009	SRV-CONTR-SPECFC JBS	\$0	\$0	\$1,134	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$0	\$1,773	\$0	\$0	\$5,225
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$59,380	\$78,687	\$658	\$13,354	\$110,111
100011.000	Customer Programs & Projects	Non-Labor	16-Market Research	6220051	MARKET RESEARCH	\$16,942	\$0	\$0	\$21,422	\$24,300
100011.000	Customer Programs & Projects	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$35,379	\$25,061	\$22,884	\$43,218	\$17,663
100011.000	Customer Programs & Projects	Non-Labor	01-Employee Luncheons	6220062	SRV-FOOD-MAINT (CBS)	\$0	\$60	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220070	SRV-NEWSPAPER ADVERT	\$6,083	\$0	\$0	\$2,945	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$0	\$0	\$0	\$0	\$926
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$98,263	\$181,802	\$373,704	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$183	\$373	\$2,385	\$1,822	\$3,571
100011.000	Customer Programs & Projects	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$45,910	\$34,867	\$16,971	\$42,977	\$29,279
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$8,553	\$5,046	\$12,133	\$96	\$10,552
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220400	SRV-BUS FORMS STOCK	\$55	\$19	\$9	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$120	\$56	\$31	\$39	\$119
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220402	SRV-PRNTG STATIONERY	\$545	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220403	SRV-PRINTNG ENVLOPES	\$626	\$0	\$0	\$536	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220410	SRV-PUBLICITNS&SUBSCR	\$32,404	\$0	\$0	\$0	\$317
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$268	\$0	\$0	\$5,231	\$9,534
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$10	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$2,956	\$4,293	\$1,780	\$8,215	\$1,031
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220430	SRV-MAIL-GENERAL	\$0	\$0	\$40	\$0	\$6,025
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220431	SRV-MAIL-SPEC PROJ	\$2,327	\$0	\$0	\$0	\$6,735
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220450	SRV-MAIL-POSTAGE	\$0	\$0	\$301	\$10	\$27,961
100011.000	Customer Programs & Projects	Non-Labor	15-Supplemental Workforce	6220480	SRV-ENGINEERING	\$0	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$65	\$0	\$31	\$75	\$18

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$20,053	\$5,301	\$13,649	\$533	\$164
100011.000	Customer Programs & Projects	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$203,692	\$12,906	\$37,907	\$37,225	\$0
100011.000	Customer Programs & Projects	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$29,944	\$15,706	\$18,241	\$31,882	\$11,600
100011.000	Customer Programs & Projects	Non-Labor	23-Misc NL Costs	6220800	SRV-CONSERVATION	\$0	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220810	SRV-CUSTOMER SERVCS	\$7,035	\$4,168	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6220811	SRV-CUSTOMER EVENT	\$3,050	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6220813	SRV-SPNSR BUS & CVC	\$11,053	\$0	\$71,728	\$21,835	\$9,250
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220840	SRV-VEH&EQUIP RENTAL	\$2,929	\$0	\$7	\$198	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220860	SRV-MAINT/REPAIR	\$38,241	\$48,652	\$6,338	\$0	\$1,623
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$221	\$162	\$208	\$508	\$50
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6220930	SRV-ENRGY EFFICIENCY	\$31,324	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$1,205	\$5,839	\$1,712	\$2,513	\$7,358
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6220990	SRV-COMPTR HW MNT&LS	\$0	\$23,141	\$2,131	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6221010	SRV-STORAGE	\$606	\$9,745	\$18,430	\$17,581	\$14,247
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6221071	SRV-CORP EVENT INHSE	\$283	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	09-Communication/Adv Svcs	6230160	SRV-NEWS PHOTO	\$0	\$0	\$904	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$434,142	\$242,121	\$17,844	\$267,402	\$271,473
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$1,312	\$994	\$232	\$6,174	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$0	\$0	\$0	\$3,362	\$4,000
100011.000	Customer Programs & Projects	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$0	\$0	\$0	\$10,265	\$200
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$3,703	\$157	\$0	\$470	\$646
100011.000	Customer Programs & Projects	Non-Labor	07-Events	6230681	SRV-EV & TKT-CHGBK	\$2,531	\$5,080	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6230800	SRV-CONSERVN INCENT	\$981	\$5,963	\$36,189	\$18,766	\$30,653
100011.000	Customer Programs & Projects	Non-Labor	17-Purchased Services	6230820	SRV-REG RQ PAYMTS	\$0	\$0	\$0	\$26,253	\$0
100011.000	Customer Programs & Projects	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$207	\$129	\$913	\$30,894	\$36,967
100011.000	Customer Programs & Projects	Non-Labor	20-Dues	6250002	DUES-SOCIAL	\$166	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	22-Govt Payments	6280001	GOV PYMNTS-PERMITS	\$0	\$0	\$0	\$632	\$0
100011.000	Customer Programs & Projects	Non-Labor	21-Customer Refunds	6290400	MISC REIMBURSEMENTS	\$0	\$26,205	\$21,759	\$1,137	\$36,439
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$614	\$797	\$679	\$510	\$524
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320001	TELE-COMM SYS COSTS	\$381	\$0	\$65	\$2,648	\$1,032
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$103,866	\$36,057	\$23,083	\$20,161	\$13,731
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320003	TELE-CALLING CARDS	\$195	\$180	\$27	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$9,026	\$8,625	\$7,431	\$6,938	\$6,855
100011.000	Customer Programs & Projects	Non-Labor	18-Telephone Expenses	6320010	MEASURED BUSINESS LI	\$0	\$0	\$0	\$0	\$1,698
100011.000	Customer Programs & Projects	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$3)	\$0	\$0	\$0	\$0
100011.000	Customer Programs & Projects	Non-Labor	23-Misc NL Costs	6400375	A&G-REAL PROPRENAL	\$0	\$0	\$0	(\$43,688)	\$0
100011.000	Customer Programs & Projects	Non-Labor	23-Misc NL Costs	6900200	ACCOUNTING ADJ.-NO O	\$0	\$0	\$0	(\$208)	\$0
100011.000	Customer Programs & Projects	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$1,393,211	\$852,651	\$807,850	\$972,524	\$1,302,727
100011.000	Customer Programs & Projects	TOTAL		TOTAL ALL		\$2,297,884	\$1,794,865	\$1,783,641	\$2,425,107	\$2,720,659
100012.000	Other Office	Labor	01-Straight Time Labor	6110010	SAL-EXEC	\$233,341	\$216,214	\$168,054	\$196,648	\$153,502
100012.000	Other Office	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$156,102	\$124,794	\$195,775	\$182,514	\$316,084
100012.000	Other Office	Labor	02-Overtime Labor T&1/2	6110030	SAL-MGMT T&1/2	\$10,201	\$2,518	\$4,286	\$0	\$0
100012.000	Other Office	Labor	03-Overtime Labor DT	6110040	SAL-MGMT D/T	\$11,168	\$1,666	\$647	\$0	\$0
100012.000	Other Office	Labor	01-Straight Time Labor	6110110	SAL-UNION S/T	\$0	\$0	\$0	\$371	\$0
100012.000	Other Office	Labor	01-Straight Time Labor	6110140	SAL-TEMP F-T S/T	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Labor	01-Straight Time Labor	6110141	SAL-EMP CNTR MGT S/T	\$0	\$0	\$0	\$0	\$32,438
100012.000	Other Office	Labor	01-Straight Time Labor	6110142	SAL-EMP CNTR C&T S/T	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Labor	02-Overtime Labor T&1/2	6110151	SAL-EMP CNTR MGT T&H	\$0	\$0	\$0	\$0	\$91
100012.000	Other Office	Labor	02-Overtime Labor T&1/2	6110152	SAL-EMP CNTR C&T T&H	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$0	\$0	\$1,808	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
100012.000	Other Office	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$36,388	\$0	\$0	\$0	\$0
100012.000	Other Office	Labor	06-Bonus Labor	6110333	SAL-SIGNING BONUS	\$0	\$0	\$0	\$0	\$5,000
100012.000	Other Office	Labor	05-Other Labor	6110335	SAL-DEL LUNCH PREM	\$0	\$14	\$0	\$0	\$0
100012.000	Other Office	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$69,048	\$54,957	\$54,319	\$55,256	\$80,428
100012.000	Other Office	Labor		Labor	TOTAL LABOR	\$516,246	\$400,162	\$423,082	\$436,597	\$587,543
100012.000	Other Office	Non-Labor	05-Employee Related	6120036	EMP BEN-FINAN CONSUL	\$2,108	\$1,118	\$0	\$912	\$0
100012.000	Other Office	Non-Labor	03-Employee Recognition	6120113	EMP BEN-GFT CARD/CRT	\$0	\$0	\$550	\$0	\$0
100012.000	Other Office	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$4,413	\$838	\$2,415	\$686	\$1,405
100012.000	Other Office	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	05-Employee Related	6130000	EMP BEN-EXPENSES	\$0	\$0	\$2,555	\$0	\$0
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$5,960	\$3,251	\$2,872	\$12,829	\$9,299
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$1,180	\$154	\$0	\$12	\$0
100012.000	Other Office	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$1,106	\$629	\$1,851	\$7,107
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$0	(\$629)	\$94	\$0
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$0	\$629	\$590	\$610	\$1,472
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$265	\$227	\$289	\$563	\$490
100012.000	Other Office	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$4,509	\$856	\$6,541	\$1,993	\$3,240
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$1,518	\$575	\$589	\$850	\$936
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODGE	\$16,451	\$2,347	\$1,371	\$3,340	\$881
100012.000	Other Office	Non-Labor	07-Events	6130023	EMP BEN-CORP EVENTS	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$427	\$410	\$0	\$0
100012.000	Other Office	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFICE STATIONERY	\$0	\$0	\$0	\$180	\$0
100012.000	Other Office	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$0	\$2,790
100012.000	Other Office	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$3,406	\$4,059	\$2,889	\$2,426	\$1,727
100012.000	Other Office	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$0	\$0	\$218	\$125
100012.000	Other Office	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$0	\$0	\$0	\$33
100012.000	Other Office	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$1,044	\$1,650	\$706	\$647	\$189
100012.000	Other Office	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$2,610	\$2,487	\$3,669	\$1,885	\$9,576
100012.000	Other Office	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$0	\$139	\$156	\$233	\$311
100012.000	Other Office	Non-Labor	12-Other Materials	6213120	MATL-AUDIO VISUAL EQ	\$606	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$308	\$3,479	\$863	\$1,056	\$0
100012.000	Other Office	Non-Labor	12-Other Materials	6213505	MATL-SAFETY	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	12-Other Materials	6213510	MATL-SAFETY EQUIPMNT	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	18-Telephone Expenses	6213560	MATL-TELECOM EQUIPMT	\$0	\$1,826	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$0	\$0	\$0	\$674	\$0
100012.000	Other Office	Non-Labor	12-Other Materials	6215110	MI-MIRAMAR WRHSE	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$0	\$0	\$26,003	\$0	\$3,000
100012.000	Other Office	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$7,246	\$8,990	\$8,776	\$334,448	\$9,233
100012.000	Other Office	Non-Labor	15-Supplemental Workforce	6220004	SRV-CONTRACT LABOR	\$0	\$0	\$36,939	\$238,108	\$167,940
100012.000	Other Office	Non-Labor	17-Purchased Services	6220020	SRV-AUDITING FEES	\$0	\$0	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	09-Communication/Adv Svcs	6220030	SRV-ADVT & MKTG PUBL	\$0	\$0	\$0	\$1,346	\$0
100012.000	Other Office	Non-Labor	09-Communication/Adv Svcs	6220050	SRV-ADVRTSNG&MKTG	\$0	\$0	\$649	\$55,533	\$8,037
100012.000	Other Office	Non-Labor	16-Market Research	6220051	MARKET RESEARCH	\$13,106	\$7,978	\$93,019	\$0	\$0
100012.000	Other Office	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$1,432	\$3,672	\$5,753	\$5,315	\$13,340
100012.000	Other Office	Non-Labor	09-Communication/Adv Svcs	6220110	SRV-TELEVISION ADVERT	\$0	\$0	\$0	\$33,210	\$0
100012.000	Other Office	Non-Labor	09-Communication/Adv Svcs	6220245	SRV-BILL INSRTS-REG	\$0	\$2,982	\$0	\$0	\$0
100012.000	Other Office	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$89	\$0	\$0	\$0	\$0

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
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					Fiscal year	2009	2010	2011	2012	2013
2100-0006	CUSTOMER SERVICE STRATEGIES	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$14,405	\$14,457	\$14,253	\$13,768	\$15,481
2100-0006	CUSTOMER SERVICE STRATEGIES	Labor	Labor	Labor	TOTAL LABOR	\$107,703	\$105,267	\$111,015	\$108,787	\$113,090
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	03-Employee Recognition	6120145	EMP BEN-GIFT CARDS	\$0	\$0	\$0	\$31	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	03-Employee Recognition	6120151	EMP BEN-GIFT CRD INV	\$0	\$0	\$52	\$0	\$25
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$352	\$374	\$1,520	\$451	\$1,004
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$0	\$37	\$438	\$420
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$11	\$57	\$1,021
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$45	\$0	\$0	\$5	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$845	\$241	\$433	\$1,679	\$1,020
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$58	\$22	\$22	\$203	\$156
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$39	\$0	\$147	\$89	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$0	\$0	\$0	\$0	\$382
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$93	\$46	\$0	\$20	\$678
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$1,501	\$0	\$2,880	\$1,937	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$4	\$0	\$4	\$14
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$0	\$0	\$748	\$236	\$42
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	11-Office/Furn Supplies	6213020	MATL-OFFICE EQUIPMNT	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$0	\$0	\$0	\$327	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$0	\$0	\$0	\$0	\$151
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	12-Other Materials	6213130	MATL-BOTTLED WATER	\$0	\$0	\$0	\$0	\$59
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$0	\$0	\$425	\$0	\$2,539
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$0	\$0	\$0	\$51
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$0	\$0	\$631	\$2,467	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$0	\$0	\$719	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$0	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$0	\$0	\$733	\$566	\$0
2100-0006	CUSTOMER SERVICE STRATEGIES	Non-Labor	Non-Labor	Non-Labor	TOTAL NON-LABOR	\$2,933	\$688	\$8,357	\$8,512	\$7,562
2100-0006	CUSTOMER SERVICE STRATEGIES	TOTAL	TOTAL	TOTAL ALL		\$110,636	\$105,956	\$119,372	\$117,298	\$120,652
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$369,959	\$271,685	\$257,761	\$196,434	\$223,738
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	01-Straight Time Labor	6110080	SAL-CLERICAL/TECH ST	\$62,693	\$62,866	\$50,186	\$44,791	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	02-Overtime Labor T&1/2	6110090	SAL-CLERICAL/TEC T&H	\$172	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	05-Other Labor	6110270	SAL-SEVERENCE	\$68,648	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$77,427	\$53,260	\$45,361	\$34,953	\$35,485
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Labor	Labor	Labor	TOTAL LABOR	\$578,900	\$387,811	\$353,307	\$276,178	\$259,223
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$11,823	\$10,439	\$7,101	\$5,977	\$4,746
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$1,687	\$2,397	\$4,325	\$1,194	\$1,702
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$49	\$0	\$32	\$78
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$31	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$3,036	\$3,252	\$4,168	\$3,529	\$5,141
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$1,155	\$1,146	\$211	\$434	\$284
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$3,099	\$1,959	\$4,059	\$855	\$745
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$958	\$1,177	\$291	\$394	\$231
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTL	\$1,258	\$1,825	\$741	\$663	\$1,031
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$3,856	\$9,212	\$4,228	\$5,068	\$4,950
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130021	NON-EMP TRVL-RECRUIT	\$0	\$2,454	\$0	\$0	\$0

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					Fiscal year	2009	2010	2011	2012	2013
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$165	\$473	\$214	\$290	\$603
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6211470	MATL-PRINTED MATERLS	\$0	\$146	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$3,262	\$2,919	\$1,323	\$596	\$406
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	11-Office/Furn Supplies	6213015	MATL-OFC FURNITURE	\$0	\$28	\$0	\$442	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6213025	MATL-COMPUTER EQUIP	\$0	\$0	\$0	\$0	\$197
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$0	\$1,578	\$0	\$315	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$43	\$491	\$75	\$54	\$45
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$0	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$49,460	\$144,214	\$80,179	\$8,394	\$56,023
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$875	\$739	\$524	\$47	\$181
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	12-Other Materials	6215070	MI-KEARNY WRHSE	\$10	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	12-Other Materials	6215100	MI-EASTERN WRHSE	\$0	\$0	\$7	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6220000	PURCHASED SERVICES	\$445	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$206,201	\$82,769	\$74	\$170	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$1,160	\$1,978	\$947	\$0	\$120
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$10,948	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6220360	SRV-CMPTR ORD FLFLMT	\$378	\$185	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	15-Supplemental Workforce	6220380	SRV-TEMP AGENCY LABOR	\$7,893	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6220412	SRV-COPY-CONVEN	\$2,626	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6220420	SRV-COPY CENTER	\$0	\$0	\$0	\$96	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$561	\$19	\$21	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6220433	SRV-MAIL-COURIER	\$0	\$45	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6220580	SRV-ONLINE SRV MISC	\$1,166	\$0	\$0	\$123	\$56
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$15	\$0	\$0	\$103	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	13-Consulting	6220600	SRV-CONSULTING-OTHER	\$44,887	(\$43,902)	\$0	\$198,541	\$24,705
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$5,091	\$3,176	\$1,624	\$563	\$703
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6220920	SRV-SAFETY RELATED	\$0	\$54	\$52	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	11-Office/Furn Supplies	6220960	SRV-MOVING	\$88	\$80	\$103	\$76	\$50
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6221034	SRV-TRAVEL-AGENCY	\$0	\$124	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	07-Events	6221071	SRV-CORP EVENT INHSE	\$0	\$4,502	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6230140	SRV-MEDIA RELATIONS	\$0	\$428	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	10-Computer Related	6230250	SRV-SFTWR MAINT&LSE	\$0	\$15,311	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	15-Supplemental Workforce	6230380	SRV-CONTRACT LABOR	\$0	\$0	\$312	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	09-Communication/Adv Svcs	6230390	SRV-PNTG GRPH VIDEO	\$0	\$55	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$0	\$0	\$0	\$0	\$1,378
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	05-Employee Related	6230559	SRV-RCRTG COLL TRVL	\$356	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	17-Purchased Services	6230600	SRV-PROF/NOT LEGAL	\$17,517	\$4,283	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	06-Employee Training	6230641	SRV-TRNG & SEMIN EXT	\$4,434	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	07-Events	6230680	SRV-EVENT & TICKETS	\$55	\$316	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$372	\$21,587	\$135,967	\$0	\$130,875
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	18-Telephone Expenses	6320000	TELE/COMMUNICATIONS	\$13	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$6,448	\$3,722	\$2,059	\$1,639	\$1,417
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$1)	\$0	\$0	\$0	\$0
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	23-Misc NL Costs	6405700	ACCTG ADJ NO OH APPL	\$5,474	\$0	\$0	\$135,994	\$9,900
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	Non-Labor	TOTAL	Non-Labor	TOTAL NON-LABOR	\$396,814	\$279,260	\$248,603	\$365,589	\$245,567
2100-3434	PLANNING & DEVELOPMENT DIRECTOR	TOTAL	TOTAL ALL	TOTAL ALL		\$975,714	\$667,071	\$601,910	\$641,767	\$504,790
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$190,194	\$183,124	\$100,321	\$97,502	\$105,305
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$29,366	\$29,153	\$14,777	\$14,128	\$16,701
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Labor	Labor	Labor	TOTAL LABOR	\$219,560	\$212,277	\$115,099	\$111,630	\$122,006
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$80	\$785	\$774	\$1,809

Attachment for ORA-SDG&E-DR-051-TLG, Question 9
 Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$278	\$89	\$72	\$24	\$638
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$0	\$0	\$45	\$24	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$0	\$29	\$0	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$0	\$0	\$191	\$0	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$0	\$0	\$0	\$1	\$52
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$0	\$75	\$203	\$0	\$17
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	10-Computer Related	6213030	MATL-SOFTWARE	\$0	\$0	\$0	\$42	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$40	\$0	\$0	\$223	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$0	\$0	\$0	\$43	\$40
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$670	\$601	\$651	\$741	\$725
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor	23-Misc NL Costs	6405700	ACCTG ADJ NO OH APPL	\$0	\$0	\$107	\$109	\$0
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$988	\$845	\$2,083	\$1,982	\$3,281
2100-3461	BUSINESS PLNG & BUDGETS CUSTOMER SERVICE	TOTAL		TOTAL ALL		\$220,548	\$213,122	\$117,182	\$113,612	\$125,287
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$105,715	\$106,201	\$107,293	\$107,058	\$108,184
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$0	\$1,039	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$16,322	\$16,907	\$15,957	\$15,513	\$17,158
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Labor		Labor	TOTAL LABOR	\$122,037	\$123,108	\$124,289	\$122,571	\$125,342
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$0	\$0	\$491	\$927	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$0	\$0	\$168	\$116	\$74
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	02-Employee Meals	6130010	EMP TRVL-MEALS&TIP	\$0	\$0	\$58	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$0	\$0	\$5	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$1,372	\$1,141	\$1,584	\$3,648	\$3,682
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$0	\$39	\$248	\$309	\$55
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$0	\$0	\$250	\$320	\$307
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$0	\$0	\$0	\$144	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$0	\$0	\$146	\$834	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	11-Office/Furn Supplies	6211395	MATL-OFFCE STATIONRY	\$30	\$0	\$0	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$0	\$4	\$0	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$37	\$0	\$165	\$282	\$39
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	10-Computer Related	6220250	SRV-SOFTWR MAINT&LSE	\$0	\$0	\$1	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$0	\$0	\$0	\$3,357	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	07-Events	6230540	SRV-HOLIDAY EVENTS	\$102	\$0	\$136	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$898	\$1,045	\$725	\$704	\$758
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor	18-Telephone Expenses	6320004	TELE-PAGERS	\$89	\$0	\$0	\$0	\$0
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$2,528	\$2,229	\$3,977	\$10,642	\$4,915
2100-3511	CCC STRATEGY AND ANALYSIS MANAGER	TOTAL		TOTAL ALL		\$124,565	\$125,337	\$128,266	\$133,213	\$130,257
2100-3709	CLEAN TRANSPORTATION MANAGER	Labor	01-Straight Time Labor	6110020	SAL-MGMT S/T	\$98,343	\$7,009	\$66,341	\$69,415	\$72,502
2100-3709	CLEAN TRANSPORTATION MANAGER	Labor	05-Other Labor	6110256	SAL-MISC	\$0	\$0	\$0	\$783	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Labor	04-Paid Time Off Labor	V&S	Add V&S to Adj-Rec Labor	\$15,184	\$1,116	\$9,772	\$10,172	\$11,499
2100-3709	CLEAN TRANSPORTATION MANAGER	Labor		Labor	TOTAL LABOR	\$113,527	\$8,125	\$76,113	\$80,370	\$84,001
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130001	EMP TRVL-AIR	\$4,708	\$0	\$368	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130002	EMP TRVL-RAIL	\$236	\$0	\$416	\$462	\$401
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130011	EMP TRVL-INCIDENTALS	\$38	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130012	EMP TRVL-MILEAGE	\$4,340	\$851	\$6,447	\$7,109	\$9,044
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130014	EMP TRVL-PARKING	\$546	\$0	\$10	\$36	\$10
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	02-Employee Meals	6130015	EMP TRVL-MEALS/ENT	\$4,013	\$0	\$10	\$15	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130016	EMP TRVL-CAR RENTAL	\$538	\$0	\$106	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130017	EMP TRVL-TAXI/SHUTTLE	\$1,003	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130020	EMP TRVL-HOTEL/LODG	\$1,207	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130025	EMP TRV-SUPP MILEAGE	\$0	\$0	\$0	\$424	\$712

Attachment for ORA-SDG&E-DR-051-TLG, Question 9

Exhibit Reference: SDG&E-14 Customer Service - Operations, Information & Technologies

					Fiscal year	2009	2010	2011	2012	2013
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	04-Employee Reimbursable	6130050	EMP TRVL-OTHER	\$18	\$0	\$112	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	11-Office/Furn Supplies	6213005	MATL-OFFICE SUPPLIES	\$74	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	12-Other Materials	6213035	MATL-GAS&DIESEL FUEL	\$0	\$0	\$35	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	12-Other Materials	6213085	MATL-MISCELLANEOUS	\$176	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	12-Other Materials	6213095	MATL-SUBSCR&PUBLICN	\$440	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	10-Computer Related	6213180	MATL-COMPUTR HARDWAR	\$545	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	12-Other Materials	6213455	MATL-TOOLS	\$0	\$0	\$0	\$0	\$20
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	13-Consulting	6220002	SRV-CONSULTING	\$177	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	01-Employee Luncheons	6220060	SRV-CATERING	\$411	\$0	\$0	\$795	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	09-Communication/Adv Svcs	6220390	SRV-PRINT/GRAPHICS	\$0	\$0	\$381	\$166	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	09-Communication/Adv Svcs	6220401	SRV-BUSINESS CARDS	\$0	\$0	\$31	\$34	\$30
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	09-Communication/Adv Svcs	6220422	SRV-COPY-SERVICE CTR	\$280	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	17-Purchased Services	6220590	SRV-MISCELLANEOUS	\$121	\$0	\$38	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	06-Employee Training	6220640	SRV-TRNG & SEM IN-H	\$1,150	\$0	\$618	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	20-Dues	6250001	DUES-BUSINESS/PROFES	\$1,505	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	18-Telephone Expenses	6320002	TELE-CELLULAR PHONES	\$1,664	\$15	\$772	\$893	\$923
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor	23-Misc NL Costs	6340000	Cash Discounts on Pu	(\$0)	\$0	\$0	\$0	\$0
2100-3709	CLEAN TRANSPORTATION MANAGER	Non-Labor		Non-Labor	TOTAL NON-LABOR	\$23,189	\$866	\$9,346	\$9,935	\$11,141
2100-3709	CLEAN TRANSPORTATION MANAGER	TOTAL		TOTAL ALL		\$136,717	\$8,991	\$85,459	\$90,304	\$95,141

Appendix A
SDG&E Responses to Data Requests

Attachment A.2 ORA-SDG&E-DR-051-TLG, Q2

**ORA DATA REQUEST
 ORA-SDG&E-DR-051-TLG
 SDG&E 2016 GRC – A.14-11-003
 SDG&E RESPONSE
 DATE RECEIVED: JANUARY 26, 2015
 DATE RESPONDED: FEBRUARY 10, 2015**

2. Provide documentation that explains if SDG&E’s TY 2016 Customer Service Operations, Information, and Technologies GRC request includes projects that it also requested and received funding for in its 2012 GRC (D.13-05-010), if so, identify the projects and associated costs.

SDG&E Response:

The following activities or projects are being requested in SDG&E’s TY 2016 Customer Service Operations, Information, and Technologies GRC request that were also requested in SDG&E’s 2012 GRC but for different reasons. The O&M activities from the 2012 GRC were approved, however, SDG&E’s TY 2012 GRC Decision (D.13-05-010) did not specifically approve or deny its IT capital projects. Rather, D.13-05-010 authorized a total number for all of SDG&E’s IT capital project requests.

Following are explanations for the incremental increases in SDG&E’s TY 2016 request:

O&M

Workgroup	Activity	2012 GRC (2009 \$’s)	TY 2016 GRC (2013 \$’s)	TY 2016 Explanation
AMO	Field Compliance & Maintenance Work	Requested and received approval for 11.5 FTEs - \$884K	Requesting 8.5 FTEs - \$862K	Combination of an increase of compliance testing orders above the 2013 level and a delay of when compliance activities forecasted in the 2012 GRC switched from charging the Advanced Metering Infrastructure Balancing Account to charging O&M (see details on pages BMB-16 and BMB-17 of Brad Baugh’s direct testimony Exhibit SDG&E-14).

**ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 2 (Continued):

Workgroup	Activity	2012 GRC (2009 \$'s)	TY 2016 GRC (2013 \$'s)	TY 2016 Explanation
Billing	Billing support for Net Energy Metering	Requested and received approval for 3 FTEs - \$135K	Requesting 4 FTEs - \$251K	With the continual growth of net metering customers, support levels above the 2012 GRC approved request are needed (see details on pages BMB-21 and BMB-22 of Brad Baugh's direct testimony Exhibit SDG&E-14).
Credit & Collections	MRP investigators for energy theft	Requested and received approval for 2 FTEs - \$188K	Requesting 2 FTEs - \$138K	The request in the 2012 GRC was to address additional leads being generated by the implementation of the new smart meter technology. The current quantity of leads is sufficient to warrant additional staffing above the 2012 GRC approved request (see details on pages BMB-28 and BMB-29 of Brad Baugh's direct testimony SDG&E-14).
Credit & Collections	Credit activities due to Customer Growth	Requested and received approval for .7 FTE - \$50K	Requesting 1.2 FTEs - \$77K	Increased credit activities resulting from customer growth (see details on page BMB-30).

**ORA DATA REQUEST
 ORA-SDG&E-DR-051-TLG
 SDG&E 2016 GRC – A.14-11-003
 SDG&E RESPONSE
 DATE RECEIVED: JANUARY 26, 2015
 DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 2 (Continued):

Workgroup	Activity	2012 GRC (2009 \$'s)	TY 2016 GRC (2013 \$'s)	TY 2016 Explanation
Residential Services	Outreach & Education for Plug-In Electric Vehicles	Requested \$1.385M in non-labor (\$1.040M related to PEV outreach activities) and received approval of \$400K in non-labor but did not specify the activities.	Requesting \$100K in non-labor	Growth in Plug-In Electric Vehicles (see details on pages BMB-70 and BMB-71).

Capital

- My Account Accessibility

In the TY 2016 GRC, SDG&E is requesting funding for the SDG&E My Account Accessibility capital project as described on pages BMB-125 and BMB-126 of Brad Baugh's direct testimony Exhibit SDG&E-14. The project forecast for 2014, 2015, and 2016 are \$4,704,000, \$1,587,000, and \$0, respectively.

The scope from the My Account Accessibility, My Account Products & Services and My Account Mobile Services capital projects included in SDG&E's 2012 GRC (described on pages KHC-87 and KHC-88 of Kathe Cordova's testimony Exhibit SDG&E-15) started in 2012 and became part of SDG&E's overall My Account Accessibility capital project. The project delivery for the overall My Account Accessibility project lasted longer than anticipated, and therefore SDG&E has forecasted spend in 2014 and 2015 as part of its TY 2016 GRC. As shown in workpaper page 382, the historical spend for the project for the period 2009-2013 is:

2009-2011: \$0
 2012: \$7,000
 2013: \$3,072,000

In the TY 2016 GRC, SDG&E is requesting funding for the SoCalGas My Account Accessibility capital project as described on pages BMB-124 and BMB-125 of Brad Baugh's direct testimony

**ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE**

**DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 2 (Continued):

Exhibit SDG&E-14. The project forecast for 2014, 2015, and 2016 are \$113,000, \$0, and \$0, respectively.

The scope from the My Account Accessibility and My Account Products & Services included in SDG&E's 2012 GRC (as described on pages KHC-87 and KHC-88 of Kathe Cordova's testimony Exhibit SDG&E-15) started in 2011 and became part of SoCalGas's overall My Account Accessibility capital project which started in 2011 and completed in 2014. As shown in workpaper page 382, the historical spend for the project for the period 2009 through 2013 is:

2009-2010: \$0
2011: \$50,000
2012: \$2,027,000
2013: \$745,000

- Bill Redesign

In its TY 2016 GRC request, funding for a Bill Redesign capital project is being requested as described on pages BMB-128 and BMB-129 of Brad Baugh's direct testimony Exhibit SDG&E-14. The forecast for this project for 2014, 2015, and 2016 are \$0, \$1,929,000, and \$1,394,000, respectively.

The purpose of this project is to improve SDG&E's customer bill to address changes in the electric industry. As the electric industry is changing, our existing bill format lacks the flexibility to meet the expectations or the future needs of our customers. This project will leverage the existing formatting software to redesign our bill, and to enhance the bill presentation and graphics. Customer expectations are expanding dramatically and each succeeding generation of SDG&E customers emerge with new technologies that provide new options for our customers. Smart Meter data allows us to provide more specific and targeted information than ever before. Rate reform, Smart Pricing and Demand Response programs will require us to provide timely, valuable and easy to read power usage information, alternative rate options and other important information to our customers to help them to make informed decisions in support of energy use, cost and conservation. While these tools are available now to customers online, over half our customers still receive a paper bill. The objective of this project is to target those customers and provide a paper bill that is easier to understand, incorporates more graphic information, and provides a large font option. SDG&E also plans to offer customers currently receiving a paper bill the option of a one sheet/two page summary bill in lieu of the current full bill detail.

**ORA DATA REQUEST
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SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 2 (Continued):

In its TY 2012 GRC request, funding for a Bill Redesign capital project was requested. As described on page JSR-47 of Steve Rahon's direct testimony (Exhibit SDG&E-14), this project was mandated by California Public Utilities Commission ("CPUC") Decision ("D") 05-11-009 which directed the utilities to develop a more customer friendly, useful bill format that could assist customers in meeting demand response, energy efficiency, and other policy goals.

The purpose of the project was to redesign SDG&E's bill to improve readability by structuring the information in a logical hierarchy starting with utility contact information at the top, followed by account summary, account detail and targeted messaging. Icons were used to draw the customer's attention to important bill messages. A column format was used to improve the readability associated with the detailed Energy Charges section. Improved facilitation of customer decision making was accomplished by including a usage chart displaying 13 months of historical energy use; a tabular chart comparing the current month's usage to the previous month and to the same month of the prior year; and a usage chart showing the average cost per kWh by tier. Finally, new printer technology was enabled to allow duplex printing, 8 ½ x 11 paper size, and graphics.

As shown in workpaper page 382, the historical spend for the project for the period 2009 through 2013 is:

2009: \$1,233,000
2010: \$1,044,000
2011: \$6,000
2012: \$1,000

The two Bill Redesign projects described above are distinctly different with different business drivers.

Appendix A
SDG&E Responses to Data Requests

Attachment A.3 ORA-SDG&E-DR-051-TLG, Q12c

ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
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SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015

12. SDG&E states on page BMB-36 that it “contracts with a third party vendor that provides a network of approximately 75 APLs. These APLs provide similar payment services for SDG&E customers and offer convenient locations and extended hours.”
- a. Provide documentation that explains if the 75 APLs charge SDG&E or its customers an additional fee for the payment services. If so, provide the documentation that demonstrates all costs that are charged.
 - b. Provide documentation that explains if the 75 APLs provide any other type of service, specifically the same services and quality of services customers expect from services provided by SDG&E employees at its Branch Offices, for SDG&E’s customers other than bill payment services.
 - c. Provide documentation that explains in detail the amount of time it takes for a payment made by a SDG&E customer at one of the 75 APLs takes to post to a customer’s account vs. the amount of time it takes for a payment to post to a customer’s account when the payment is made at a SDG&E Branch Office (i.e., if a customer receives a service shut off notice and a final payment is due on the day the payment is made, will the payment post to the customer’s account the minute the payment is made at one of the 75 APLs).

SDG&E Response:

- a. SDG&E Authorized Payment Locations (APLs) do not charge a fee to customers who are making a payment or for a Positive Identification Verification. SDG&E is under contract with a 3rd Party vendor CheckfreePay/FISERV and pays a monthly fee to manage the APL contracts.
- b. The following transactions may be conducted at select APLs or APLs that have a direct connect telephone where customers are able to speak directly with an SDG&E representative:
 - Reviewing and discussing billing and account activity at length;
 - Setting up payment arrangements;
 - Starting/stopping services;
 - Providing information about and enrolling customers in energy savings programs;
 - Request copies of billing statements;
 - Request verification and credit reference letters;
 - Customer identification verification (POS ID). POS ID verification is a process for authenticating new customers. A number of APL’s have agreed to assist with POS ID ;
 - CARE collateral and applications are available for customers.

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SDG&E RESPONSE**

**DATE RECEIVED: JANUARY 26, 2015
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Response to Question 12 (Continued)

- c. Payments processed both at an SDG&E Branch Office or at an APL will memo post (pending payment) to a customer's account and will stop any pending shut off/disconnection notice. Branch Office payments memo post immediately while APL payments memo post hourly (during hours when customers may be disconnected). While there is a slight delay with memo posting from an APL, the customer is given a confirmation number at time of payment that can be used to cancel the disconnection. SDG&E is unaware of any issues resulting from the memo post delay. The payment will automatically post on the customer's account when the Branch Office or APL completes their closeout at the end of the day; a payment file is generated and will be uploaded in our CIS system.

Appendix A
SDG&E Responses to Data Requests

Attachment A.4 ORA-SDG&E-DR-051-TLG, Q14f

ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
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SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
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14. In 2013, 58% of SDG&E’s customers that used its National City Branch Office paid with cash. 60% of SDG&E’s customers that paid at the National City Branch Office were identified as customers on the California Alternate Rates for Energy (“CARE”) program. For SDG&E’s Downtown Branch Office, 24% of customers paid with cash. 38% of SDG&E’s customers that paid at the Downtown Branch Office were identified as CARE customers. For SDG&E’s Oceanside Branch Office, 54% of customers paid with cash. 41% of SDG&E’s customers that paid at the Oceanside Branch Office were identified as CARE customers (see pages BMB-45 to BMB-48).
- a. Provide the documentation SDG&E’s management relied upon to determine that “the Branch Office closures and conversion as a whole would be beneficial to our customers from a cost savings perspective and would not diminish services available to them, including SDG&E’s low income customers.”
 - b. Provide documentation that demonstrates the results of surveys and studies SDG&E conducted with its low income customers which determined that the proposed Branch closures would not diminish or negatively impact the customer service these customers currently receive.
 - c. Provide documentation that demonstrates the percentage of SDG&E’s customers that paid with cash at its Chula Vista, El Cajon, Escondido, and Market Creek Branch Offices.
 - d. Provide documentation that demonstrates the percentage of payments that came from SDG&E’s CARE customers utilizing the Chula Vista, El Cajon, Escondido, and Market Creek Branch Offices.
 - e. Provide documentation that demonstrates the median household income for Chula Vista, El Cajon, Escondido, and Market Creek.
 - f. SDG&E states on page BMB-43 that “The savings and one-time costs are not reflected in the Branch Office TY 2016 forecast. Adjustments will need to be made to SDG&E’s authorized revenue requirement if SDG&E’s proposal is approved.” Provide documentation that explains why SDG&E did not include the proposed savings in its TY 2016 forecast but included its proposal for the office closures.

SDG&E Response:

- a. See pages 6, 7 and 8 of the attached confidential internal study for the National City, Downtown and Oceanside Branch Offices, for the annual cost savings and low income customer impact (see **CONFIDENTIAL** attachment labeled “SDG&E-ORA-DR-051-TLG Q10 Confidential Attachment.pdf”). *Note: Costs in presentation are draft costs and final costs are documented in GRC application.*
- b. No diminished services to customers will occur with the proximity and quantity of APLs and other Branch Office availability described below:

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 SDG&E RESPONSE
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 DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 14 (Continued):

- National City – Six APLs available within a three mile radius of this office (11 additional APLs within a 5 mile radius) with one APL being right next door. Of the six APLs within a 3 mile radius, one is equipped with a courtesy phone which connects directly to the Customer Contact Center (“CCC”), two provide identity verification and all APLs are compliant per the Americans with Disabilities Act (ADA). Of the 11 APLs within a five mile radius, one is equipped with a courtesy phone with a direct line to the CCC, two provide identity verification services (POSID), and all are compliant per the ADA. The APLs are convenient for customers using public transportation.
- Downtown – The Market Creek Branch Office is within six miles of the Downtown branch office and there are currently four APLs available within a three mile radius of this office (five additional APLs within a 5 mile radius). One of these four APLs is equipped with a courtesy phone which connects directly to the CCC, two provide identity verification and all APLs are compliant per the Americans with Disabilities Act (ADA). The four APLs are convenient for customers using public transportation.
- Oceanside – There are currently two APLs available within a three mile radius of this office (four additional APLs within a five mile radius). Once SDG&E converts the Oceanside Branch Office to an APL, leaving a courtesy phone which connects to the CCC and removing the ExpressPay and Virtual ESS machines, SDG&E will have three APLs within a three mile radius of the current Oceanside Branch Office. Of the four APLs that are within a five mile radius, two are equipped with courtesy phones to connect to the CCC, two provide identity verification and all APLs are ADA compliant. The APLs are convenient for customers using public transportation.

c. In 2013, the following percentage of Branch Office customers paid with Cash:

Chula Vista	49%
El Cajon	50%
Escondido	71%
Market Creek	58%

d. Below are the percentages of CARE customers who utilized these offices:

	% CARE Customers
CHULA VISTA B.O.	60%
EL CAJON B.O.	55%
ESCONDIDO B.O.	58%
MARKET CREEK B.O.	73%

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SDG&E Response to Question 14 (Continued):

- e. Below are the median household incomes of customers who utilized these offices:

	Median HH Income
CHULA VISTA B.O.	\$52,541
EL CAJON B.O.	\$56,498
ESCONDIDO B.O.	\$53,499
MARKET CREEK B.O.	\$44,038

- f. SDG&E did not include the proposed savings in its TY 2016 GRC for the closure of its Branch Offices because SDG&E is not presuming the outcome of the Commission's disposition of SDG&E's request for closure. If the Commission approves SDG&E's closure request, then SDG&E will reduce revenue requirements to reflect the net savings (annual savings net costs to achieve). These savings will reflect effective timing of actual closure for each specific office during the first calendar year of closure and then subsequent year annual savings.

Appendix A
SDG&E Responses to Data Requests

Attachment A.5 ORA-SDG&E-DR-051-TLG, Q19

**ORA DATA REQUEST
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 SDG&E 2016 GRC – A.14-11-003
 SDG&E RESPONSE
 DATE RECEIVED: JANUARY 26, 2015
 DATE RESPONDED: FEBRUARY 10, 2015**

19. Regarding SDG&E’s CARE Enrollment, SDG&E states on page BMB-55 that “As part of the settlement agreement, SDG&E agreed to seek funding for this activity as part of its Low Income Programs proceeding. To ensure SDG&E is properly staffed to begin taking CARE enrollments through the ESS in TY 2016, the additional expense is being requested as part of this GRC. However, if SDG&E receives funding through its Low Income Program Application which is anticipated to be filed with the CPUC in November 2014, an adjustment will be made to the CCC TY 2016 forecast.” Provide documentation to explain in more detail SDG&E’s TY 2016 forecast for its Customer Contact Center Operations and state clearly why it included costs in its 2016 GRC when “SDG&E agreed to seek funding for this activity as part of its Low Income Programs proceeding.”

SDG&E Response:

Historically and currently, CCC agents have reached out to customers about the CARE program when customers contacted agents for payment arrangements, new service or CARE program inquiry. The past and current practice includes CCC agents directing customers to enroll on line or via automated phone system, offering to mail CARE application forms to the customers. The practice stops short of enrolling customers to the program.

The projected annual number of applications mailed to customers was 25,000 and complete applications returned for enrollment were 6,500. The successful enrollment rate via mail was 26%.

CCC agents enrolling CARE eligible customers when customers are in contact with agents is a condition of the Disconnection OIR proceeding (R.10-02-005) settlement agreement to increase the number of CARE enrollments and the success of the CARE program.

It’s estimated that CCC agents will enroll 80% of 25,000 customers who normally would have requested CARE application forms to be mailed. It’s estimated that it will take an average of 290 seconds to complete the enrollment. It’s estimated the enrollment process will require 1,644 hours of agent time annual, equivalent to 1.5 FTE.

Forecast for CARE Enrollment:

<u>FTE (A)</u>	<u>Hours (B)</u>	<u>\$ per Hour (C)</u>	<u>Total = A*B*C/1000</u>
1.5	2088	\$23.12	\$72 K
<u>Call Volume (A)</u>	<u>AHT (in seconds) (B)</u>	<u>Total = A*B (in seconds)</u>	
20,000	290	5,800,000	

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SDG&E Response to Question 19 (Continued):

SDG&E included costs in its 2016 GRC when “SDG&E agreed to seek funding for this activity as part of its Low Income Programs proceeding” for the following reasons:

On November 18, 2014, SDG&E filed its Application (A). 14-11-009 requesting approval of its 2015-2017 program plans and budgets for its Low Income Programs.¹ Included in the Testimony of Policy witness Alex Kim² is a detailed explanation on why SDG&E submitted a request for the cost for the Customer Contact Center (CCC) phone enrollment efforts for CARE in both the low income proceeding and the 2016 GRC. In two prior decisions the Commission clarified its policy that cost associated with CCC efforts to inform customers about the CARE program were responsibilities and activities that would be part of the normal customer contact between a CCC agent and customer, and therefore should be funded from base rates and not through the public goods charge. Following is a summary of the Commission’s prior directives regarding the issue of CARE-related CCC costs to the CARE program budget:

- D.02-09-021, Ordering Paragraph 8, provided clear direction that administrative costs booked to the low income assistance balancing accounts must be “incremental” (not provided for in the utility’s base rates).
- D.05-04-052 determined that the cost of SDG&E’s call center to inform customers about CARE are not incremental cost (which would not have to be incurred but for the presence of the CARE program) and, therefore, these costs should be charged to base rates instead of the CARE program. In Conclusions of Law 13 and 15 the Commission found in D.89-09-044 that an IOU may not cover customer call center costs from PGC funds, that a utility must have call center staff in place regardless of whether it offers LIEE/CARE services, and that cost of call center staff should be recovered in a utilities’ base rates, rather than as part of the public purpose funding.

More recently, in D.12-08-044, the Commission revised its policy when it approved Southern California Edison’s proposal to charge the costs of enrolling customers into the CARE program through its CCC as an incremental CARE program cost. In Footnote 108 of D. 12-08-044, the Commission determined that SCE should continue its current practice of using its call center operations organization to continue enrolling eligible customers on the CARE rate and charge incremental expenses to the CARE Program budget during the 2012-2014 program cycle. D.14-08-030 further indicated the Commission’s support for continuing to allow CARE enrollments

¹ Application of San Diego Gas & Electric Company (U90-M) for Approval of Low Income Assistance Programs and Budgets for Program Years 2015-2017, filed November 18, 2014.

² See the Prepared Direct Testimony of Alex Kim on Behalf of San Diego Gas & Electric Company’s Energy Savings Assistance Program and California Alternate Rates for Energy Program Plans and Budgets for Program Years 2015-2017, at pp. AYK 27-31.

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SDG&E Response to Question 19 (Continued):

through the utilities call centers because it is a cost effective and efficient channel for enrolling customers into the CARE program.³

On April 1, 2014, in R.10-02-005, SoCalGas/SDG&E, SCE, PG&E and the Office of Ratepayer Advocates, The Utility Reform Network, Greenlining Institute, and the Center for Accessible Technology filed a Petition for Modification of D.12-03-051 and D.12-03-054 and a Motion requesting approval of the Residential Disconnection Settlement Agreement (“Settlement Agreement”).⁴ As a condition of the Settlement Agreement, SDG&E agreed to request Commission authorization to fund the incremental costs of having its Customer Contract Center representatives enroll customers onto the CARE rate from its CARE balancing account. As part of that Settlement Agreement, SDG&E agreed to seek funding for this activity as part of its low income proceeding. However, because of prior Commission directives in D.05-04-052 disallowing call center costs to be charged to the CARE Program, SDG&E has made a concurrent request in its test year 2016 GRC, in the event the Commission rejects the funding request in the low income proceeding. Should the Commission authorize the incremental funding to enroll customers in CARE through the low income proceeding, SDG&E will make an appropriate adjustment to its request its customer contact center forecast in its TY 2016 GRC.

³³Conclusion of Law 20 and Ordering Paragraph 18

⁴ Petition of the Office of Ratepayer Advocates; The Utility Reform Network; the Greenlining Institute; The Center for Accessible Technology; Pacific Gas and Electric Company (U93E), Southern California Edison Company (U 338-E); San Diego Gas & Electric Company (U902M); and Southern California Gas Company (U 904G) to Modify Decision 10-12-051 and 12-03-054.

Appendix A
SDG&E Responses to Data Requests

Attachment A.6 ORA-SDG&E-DR-051-TLG, Q21d and Q21e

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21. SDG&E's Customer Communications, Research & Web Work Group forecasts \$14.287 million (\$42.861 million over three years) in TY 2016. This is an increase of \$6.347 million or 79.94% over 2013 recorded adjusted expenses of \$7.940 million. The five year average (2009-2013) is \$6.632 million. SDG&E's recorded expenses fluctuated during the five year period (2009-2013) and the highest recorded expense level was in 2012 of \$8.245 million.
- a. SDG&E's TY 2016 forecasts includes costs for FTEs that "are currently funded through the SPP and will transition to O&M in TY 2016. Provide documentation that clearly identifies the activities and detailed breakdown of all costs incurred during 2009-2014 (labor and non-labor) associated with the positions.
 - b. SDG&E is requesting incremental funding of \$2,870,000 in non-labor above 2013 base year "to educate customers about new rate options." SDG&E states on page BMB-100 that "The strategy for communications is to build on previous communications efforts SDG&E undertook in 2013 and 2014 timeframe alerting customers to the initial stages of rate changes and rate reform." Provide documentation that demonstrates the costs incurred for the "previous communications efforts SDG&E undertook in 2013 and 2014 timeframe alerting customers to the initial stages of rate changes and rate reform."
 - c. Provide documentation that clarifies SDG&E's forecast and state if SDG&E is forecasting \$8.610 million over three years "to educate customers about new rate options."
 - d. Provide documentation that explains in detail if SDG&E's historical expenses include costs associated with completed projects related to educating customers about rate changes and options.
 - e. Provide documentation that explains in detail why SDG&E cannot reallocate embedded funds from completed projects in the TY "to educate customers about new rate options."
 - f. SDG&E is requesting incremental funding of \$1,842,000 (\$5.526 million over three years) in non-labor above the 2013 base year for ongoing customer research activities. SDG&E's New Segmentation Survey is performed every three years, its Refresh Voice of Customer Survey is performed every other year, its New Competitive Survey and Enhanced Customer Connections Survey are both performed annually (see page BMB-87). Provide documentation that explains in detail and demonstrates why SDG&E is requesting incremental funding of \$1,842,000 to perform surveys that are recurring, routine and "ongoing" and that have costs embedded in historical expenses from the same or similar completed activities.
 - g. Provide all costs (labor and non-labor) incurred during 2009-2013 associated with the following SDG&E surveys: New Segmentation Survey, Refresh Voice of Customer Survey, New Competitive Survey and Enhanced Customer Connections Survey.

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Question 21 (Continued)

- h. SDG&E states on page BMB-88 that “The majority of the non-labor funding (\$1.5 million) is being requested to expand the current Customer Connections Survey used to measure transactions customers have with SDG&E.” SDG&E states on page BMB-87 that “The New Competitive Survey and Enhanced Customer Connections Surveys are performed annually therefore the full cost is reflected in TY 2016.” SDG&E utilized its 2013 base year expenses to calculate its TY 2016 forecast. Provide documentation that explains in detail and demonstrates that SDG&E removed all costs incurred in 2013 associated with its annually performed Enhanced Customer Connections Surveys.
- i. If SDG&E did not remove costs incurred in 2013 associated with its annually performed Enhanced Customer Connections Survey, provide documentation that explains why SDG&E is double counting the costs for this survey in its TY 2016 forecast.
- j. Provide documentation that explains in detail and demonstrates that SDG&E removed all costs incurred in 2013 associated with its annually performed New Competitive Survey.
- k. If SDG&E did not remove costs incurred in 2013 associated with its annually performed New Competitive Survey, provide the documentation that explains why SDG&E is double counting the costs for this survey in its TY 2016 forecast.
- l. SDG&E’s Table 39 on page BMB-86 lists lump sum figures for its non-labor forecasts that are proposed to increase by \$5.528 million or 96.39% over 2013 recorded adjusted expenses. SDG&E’s workpapers are insufficient and incomplete. Provide all supporting documentation and the basis used for the calculation of the non-labor forecast (i.e., the documentation that demonstrates the individual breakdown of all costs included in each estimate along with a source document).
- m. SDG&E states on page BMB-87 that it is “requesting \$379,000 in labor above the 2013 base year for four research analysts to routinely conduct customer surveys and measure results to understand drivers for customer decisions and make changes to better serve our customers.” The proposed FTEs will perform activities associated with the following SDG&E surveys: New Segmentation Survey, Refresh Voice of Customer Survey, New Competitive Survey and Enhanced Customer Connections Survey. Provide documentation that explains in detail and demonstrates if SDG&E’s historical labor expenses (2009-2013) include costs incurred by FTEs to conduct customer surveys associated with SDG&E’s New Segmentation Survey, Refresh Voice of Customer Survey, New Competitive Survey and Enhanced Customer Connections Survey. In the response provide all associated labor costs.
- n. Provide documentation that explains in detail and demonstrates if SDG&E’s historical labor expenses (2009-2013) include costs incurred by FTEs to conduct customer surveys, which have been completed, that were not associated with SDG&E’s New Segmentation Survey, Refresh Voice of Customer Survey, New Competitive Survey and Enhanced Customer Connections Survey. In the response identify the completed survey projects and provide all associated labor costs.

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Question 21 (Continued)

- o. During 2009-2013 provide documentation that explains if SDG&E's FTEs performed activities associated with measuring "results to understand drivers for customer decisions and make changes to better serve our customers."
- p. SDG&E states on page BMB-91 that "In 2013, the CCC began a pilot to use Twitter for communicating with customers, which is being gradually expanded." Provide all costs incurred in 2013 associated with the pilot.
- q. Provide documentation that demonstrates all historical (2009-2013) costs incurred for the ongoing support, consultant costs for assisting SDG&E in utilizing social media channels, ongoing maintenance, enhancements, redesigns, build outs of installed tools, etc. related to SDG&E's Social Media Activity (i.e., My Account, Facebook, Twitter, YouTube, flicker, Cision, Google Analytics, Clickfox, SDG&E's mobile application, etc.) as shown on page BMB-91.
- r. SDG&E states on page BMB-96 that it is "requesting \$376,000 in non-labor above the 2013 base year to distribute to customers event notifications and alerts" via email and text for the new SPP rates. The alerts were created as part of the SPP. SDG&E states further on page BMB-97 that "While the cost of building and promoting these energy use alerts has been funded through SPP, there are ongoing transactional costs for sending the alerts through email and/or text that will continue past 2015." Provide documentation that clarifies SDG&E's forecast and state if SDG&E is forecasting \$1.128 million over three years to distribute to customers event notifications and alerts" via email and text.
- s. Provide documentation that explains in detail if SDG&E's historical expenses include costs associated with completed projects.
- t. Provide documentation that explains in detail why SDG&E cannot reallocate embedded funds from completed projects in the TY for it "to distribute to customers event notifications and alerts" via email and text.

SDG&E Response:

- a. Please see the attachment provided in response to Question 17a above labeled "ORA-SDG&E-DR-051-TLG Q17a Attachment.xls" for a detailed breakdown of all costs incurred during 2009-2013 associated with the positions that are being funded through the SPP that will transition to O&M in TY 2016. SDG&E's recorded adjusted 2014 labor and non-labor expenses as of December 31, 2014 will not be available until March 2015.
- b. The customer communication expenses incurred in 2013 was \$1.5M and detailed in attachment labeled "ORA-SDG&E-DR-051-TLG Q21b Attachment.pdf". the costs are shown by major tactical execution. The costs were incurred for communications primarily targeting customers with energy use in tiers three and four, as well as CARE, FERA and Medical Baseline customers.

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SDG&E Response to Question 21 (Continued):

- c. As described beginning on page BMB-99 of Brad Baugh's direct testimony Exhibit SDG&E-14, the \$2.87 million forecast is based on estimated costs for use of mass media, such as television, newspaper and radio ads (\$2.11 million), online media (\$280,000), direct mail (\$175,000), email (\$25,000), and bill inserts (\$105,000) to communicate with customers and additionally includes costs for research (\$175,000) on communication effectiveness. The forecast is based on historical costs for use of these or similar channels and conversations with vendors providing these services. The \$2.87 million is the estimated expense in 2016, 2017 and 2018, totaling \$8.61 million over the three year period.
- d. No, SDG&E's historical expenses do not include costs associated with completed projects concerning rate changes and options. In fact, SDG&E is proposing expanding its current recurring education to customers on rate changes and options as discussed in detail in the response to Question 21.e.
- e. The 2013 costs allocated to communications to continue customer education about new rate options and rate structure changes are outlined in answer to 21 (b) above. The 2013 efforts were focused on customers in tiers three and four (approximately 30% or 400,000 of our residential customers), plus CARE, FERA and medical baseline customers. In 2016, 2017, and 2018 there is a need to communicate with all customers about changes to the electric rate structure, significantly increasing the number of customers we must reach by slightly over three times (30% to 100% or 400,000 to 1,200,000 customers). Therefore, overall costs will increase by a similar amount requiring SDG&E to use the \$1.5 million that is embedded in its 2013 base year in addition to the \$2.87 million in incremental funding in TY 2016 for an annual total of \$4.37 million.
- f. SDG&E's TY 2016 request for \$1,842,000 is not incremental funding for the same completed activities that are embedded in SDG&E's historical expenses for surveys for the reasons described below.

First, the New Segmentation Survey, New Competitive Survey, and Refresh Voice of the Customer Survey are just that, they are truly new surveys that are not embedded in SDG&E's historical costs. SDG&E conducted its most recent Voice of the Customer Survey in 2010 and its most recent Segmentation Survey in 2011. However, those results are very dated and are not representative of the current input or impressions of SDG&E's customers at this time, and the costs for those surveys are not included in the 2013 base year.

**ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE**

**DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 21f (Continued):

The Enhanced Customer Connections Survey SDG&E is requesting funding for an expansion of the current Customer Connections Survey. This expansion is to include measuring customer experience with the various current Customer Programs and Customer Assistance transactions offerings, as well as new service/transactions which are not included in the current surveys. The current survey excludes critical parts of company transactions. The enhanced survey will enable SDG&E to monitor these service experiences on an ongoing and regular basis to better understand the effectiveness of these services and programs.

- g. As stated in the response to Question 21.f, there are no embedded historical costs for the New Segmentation Survey, New Competitive Survey or the Refresh Voice of the Customer Survey as these are new surveys. In addition, the Enhanced Customer Connections Survey is an expansion of SDG&E's current Customer Connections Survey and has not been conducted as of yet. The previous Voice of the Customer Survey and former Segmentation Survey costs during 2009-2013 were:

Voice of the Customer: \$100K in labor and \$82K in non-labor in year 2010;
Segmentation Survey: \$309K in labor and \$141.5K in non-labor in year 2011.

- h. There were no costs incurred in 2013 for the Enhanced Customer Connections Survey as it has not been conducted.
- i. SDG&E is not double counting the costs for the Enhanced Customer Connections Survey because it is a new survey and has not been conducted.
- j. There were no costs incurred in 2013 for the New Competitive Survey as it was not conducted.
- k. SDG&E not double counting the costs for the New Competitive Survey because it is a new survey and has not been conducted.
- l. The following provides the basis for the non-labor forecast for the incremental increases to Communications, Research & Web TY 2016 request as shown in Table 39 on page BMB-86 of Brad Baugh's direct testimony Exhibit SDG&E-14. Detailed descriptions of these activities can be found in the attachment provided in response to Question 3a labeled "ORA-SDG&E-DR-051-TLG Q3a Attachment.xlsx".
- Customer Research Activities – surveys: The costs for \$1,842,000 for research are based on historical vendor costs based on the frequency of performing those surveys as shown on Supplemental Workpaper 2 on page 154 of Brad Baugh's workpapers.

**ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE**

**DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 21l (Continued):

- **Social Media Tools:** The costs for Social Media Tools of \$90,000 are based contractual agreements and vendor estimated costs. See attachment labeled “ORA-SDG&E-DR-051-TLG Q21L-A Attachment.pdf” for an additional workpaper supporting these costs. Additional information about the Social Media Tools provided in the answer to Question 21.q.
 - **Mobile Application Capabilities:** The costs for the Mobile App expanded capabilities of \$50,000 are based on historical contractual agreement with vendor. See attachment labeled “ORA-SDG&E-DR-051-TLG Q21L-B Attachment.pdf” for an additional workpaper supporting these costs.
 - **SPP Event Notifications and Goals and Alerts:** The costs for Event Notifications and Goals and Alerts of \$376,000 are detailed out in Supplemental Workpaper 1 on page 153 of Brad Baugh’s workpapers.
 - **New Rate Options and Programs:** The costs to educate customers about new rate options and programs of \$2,870,000 are based on historical costs for similar types of activities. See attachment labeled “ORA-SDG&E-DR-051 Q21L-C Attachment.pdf” for an additional workpaper supporting these costs.
 - **Enhanced Customer Education While on Customer Premises:** The costs for the \$19,000 in enhanced customer education is based on the cost to design and print 350,000 materials at \$.05 per piece and is based on historical costs for similar communications.
 - **Customer Outreach Safety Checks:** The costs for customer outreach safety checks of \$281,000 are based on the estimates shown in the attachment labeled “ORA-SDG&E-DR-051-TLG Q21L-D Attachment.pdf”. Note that SDG&E’s original estimate (see page BMB-102 of Brad Baugh’s direct testimony Exhibit SDG&E-14) inadvertently based the above costs on 500,000 mailings equating to \$0.56 cents per mailing. The correct amount is 450,000 mailings equating to \$0.62 cents per mailing.
- m. SDG&E’s 2009-2013 historical labor costs do not include costs incurred by FTEs to conduct the New Segmentation Survey, Refresh Voice of Customer Survey, New Competitive Survey, or the Enhanced Customer Connections Survey. SDG&E’s TY 2016 incremental funding request of \$379,000 make up the labor costs to conduct these surveys (see Table 41 on page BMB-87 of Brad Baugh’s direct testimony). See the response to question 21.g for the 2009-2013 historical labor costs for the former Voice of Customer Survey and former Segmentation Survey.

**ORA DATA REQUEST
 ORA-SDG&E-DR-051-TLG
 SDG&E 2016 GRC – A.14-11-003
 SDG&E RESPONSE**

**DATE RECEIVED: JANUARY 26, 2015
 DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 21 (Continued):

- n. The majority of the work FTEs spend on survey projects is spent on reoccurring surveys. Current staffing allows us to perform ongoing surveys and ad hoc surveys, of which we anticipate the volume to continue. The miscellaneous surveys below were conducted to measure customer impression of online tools and platforms, new service offerings, experiences with service and communications, infrastructure projects and targeted geographic opinion testing. While the miscellaneous surveys have been completed, these or similar surveys reoccur on an annual basis as shown by the 2009-2013 spend below. These miscellaneous surveys are separate and distinct from the incremental funding being requested for the new requested surveys described in Question 21.f above.

Following are the historical labor costs for the completed survey costs incurred during 2009-2013:

Survey	2009	2010	2011	2012	2013
Former Voice of the Customer Survey		\$82,000			
Former Segmentation Survey			141,500		
Miscellaneous Surveys	\$40,000	\$41,000	\$43,500	\$45,500	\$45,000

- o. Yes, SDG&E’s FTEs performed activities associated with measuring results to understand drivers for customer decisions and make changes to better serve its customers. However, surveys differ in regards to what drivers they are trying to uncover depending on the goal area or concept being measured. A variety of surveys are needed to cover new programs and services. SDG&E’s TY 2016 request for incremental FTEs to perform additional surveys and subsequent analysis will provide SDG&E with insight into changing customer expectations.
- p. The pilot was very small and utilized existing staff and tools and did not result in any incremental expense.
- q. Customer Communications have incurred the following costs from 2009-2013 to communicate with customers using social media channels:

**ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015**

SDG&E Response to Question 21q (Continued):

Labor (1 FTE):

2012: \$45,497.98*

2013: \$87,767.34

*This FTE started mid-way thru the year.

There is one FTE devoted to social media who started mid-2012. No costs were incurred prior to 2012 for the social media channels.

Non-labor (vendor costs):

2012: \$111,220

2013: \$75,460

There were no non-labor costs incurred prior to 2012 for the social media channels.

- r. As referenced in footnote 70 on page BMB-96 of Brad Baugh's direct testimony Exhibit SDG&E-14, a supplemental workpaper documenting SDG&E's forecast can be found on page 153 of Brad Baugh's workpapers (SDG&E-14-WP). As shown in the workpaper, the \$376,000 represents one third of the total costs for 2016 through 2018. The total amount over the three year period is \$1,129,391.
- s. There are no historical costs associated with completed projects. All work is recurring/ongoing in nature, so not considered separate projects.
- t. SDG&E TY 2016 request for \$376,000 to distribute event notifications and alerts to customers is not incremental funding for the same completed activities that are embedded in SDG&E's historical expenses.

Appendix A
SDG&E Responses to Data Requests

Attachment A.7 ORA-SDG&E-DR-051-TLG, Q20c (Amended response)

ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015
DATE AMENDED: MAY, 2015

20. SDG&E's Customer Programs & Projects Work Group forecasts \$3.443 million (\$10.329 million over three years) in TY 2016. This is an increase of \$0.722 million or 26.53% over 2013 recorded adjusted expenses of \$2.721 million. The highest recorded expense level was in 2012 of \$2.721 million. SDG&E states on page BMB-106 that it "chose a base year forecast method because during 2012 and 2013 the group expanded to include new activities requiring additional resources to support those activities."
- a. SDG&E's TY 2016 forecasts includes costs for FTEs that "were previously funded through the SPP and are being transitioned to O&M beginning in TY 2016 to provide ongoing program support." Provide documentation that clearly identifies the activities and detailed breakdown of all costs incurred during 2009-2014 (labor and non-labor) associated with the positions that "were previously funded through the SPP."
 - b. SDG&E states on page BMB-109 that "The Smart Grid decisions adopting rules to protect privacy and security (D.11-07-056 and D.12-08-045) and the CPUC's decision adopting rules to provide access to energy usage data (D.14-05-016) mandate several new compliance requirements that must be managed using new processes and tools." Provide documentation that explains in detail if SDG&E requested and was authorized funding in D.11-07-056, D.12-08-045, D.13-05-010, and D.14-05-016 to address activities associated with mandates and new compliance requirements related to protecting privacy and security. If so, provide the documentation that demonstrates the requested and authorized amounts.
 - c. SDG&E states on page BMB-110 that "These positions are critical to providing privacy-related services to our customers who expect and require that SDG&E ensure their privacy is protected." Provide documentation that explains in detail if during 2009-2013 SDG&E has failed to provide privacy-related services to its customers prior to filing its 2016 GRC. If SDG&E has provided privacy related services to its customers, provide the documentation that explains in detail the activities performed and the related costs.
 - d. SDG&E states on page BMB-110 that "In compliance with Ordering Paragraph 4 of CPUC D.11-07-056 and Ordering Paragraph 3 of CPUC D.12-08-045, SDG&E has contracted with a third party to perform an independent privacy audit of SDG&E's data privacy and security practices. The audit is scheduled to be completed in September 2014." Provide documentation that explains in detail if SDG&E requested and was authorized funding in D.11-07-056, D.12-08-045, D.13-05-010, and D.14-05-016 to address activities associated with an independent privacy audit of SDG&E's data privacy and security practices. If so, provide the documentation that demonstrates the requested and authorized amounts.

ORA DATA REQUEST
ORA-SDG&E-DR-051-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 26, 2015
DATE RESPONDED: FEBRUARY 10, 2015
DATE AMENDED: MAY, 2015

SDG&E Amended Response to Question 20c.:

- c. SDG&E has always taken customer privacy very seriously and privacy-related activities were centralized by the company in late 2012 after the Smart Grid Privacy decision. SDG&E did not track Customer Privacy costs separately until the centralization of the Customer Privacy department in late 2012. New incremental privacy requirements introduced after 2011 include: PUC Code Section 8380, Smart Grid Privacy Decision (D.11-07-056) Attachment D, and the Energy Data Access Decision (D.14-05-016) and are intended to provide privacy controls over energy usage information generated by advanced meter infrastructure. During the 2009-2013 time period, SDG&E had a privacy policy posted in a highly visible location on its website. In addition, an Information Security department was involved in the lifecycle of new projects. One of the many goals of this department was to ensure the confidentiality, integrity and availability of company information, including customer information, through a project's lifecycle. SDG&E also maintained strict procedures on customer-related activities, including everything from authenticating customers at a branch location or over the phone, to managing their authorizations for who they permitted to make account changes or be allowed access to their data. SDG&E maintained and regularly tested its incident response procedure, including California Privacy Breach Notification Act (SB1386) procedures, in the event of a breach of customer information. It maintained and regularly tested FACTA procedures. In addition, the company masked social security numbers in its customer database system, and reduced the total number of employees that had access to customer Personally Identifiable Information (PII). In addition, SDG&E underwent periodic internal audits to review existing privacy and security related controls. After 2012, the activities performed by the Office of Customer Privacy included:
1. Developing and executing a strategy for meeting the mandates described in the Privacy Decision.
 2. Developing a customer privacy framework and associated controls.
 3. Developing and implementing a process and associated software application for managing third party data requests.
 4. Developing and implementing a Privacy Impact Assessment process and associated tools.
 5. Developing and managing internal and external privacy websites to deliver content to relevant internal and external audiences.
 6. Drafting and publishing a mandated privacy notice on our external website.
 7. Developing and delivering mandated privacy training.
 8. Developing processes to integrate privacy-related activity with the company's Information Security department.

**ORA DATA REQUEST
 ORA-SDG&E-DR-051-TLG
 SDG&E 2016 GRC – A.14-11-003
 SDG&E RESPONSE
 DATE RECEIVED: JANUARY 26, 2015
 DATE RESPONDED: FEBRUARY 10, 2015
 DATE AMENDED: MAY, 2015**

SDG&E Amended Response to Question 20c (Continued):

9. Developing tools to help employees determine whether customer information is considered Sensitive.
10. Developing and maintaining a comprehensive inventory of customer information collected by the company.
11. Developing a set of Privacy Key Risk Indicators for measuring enterprise privacy risk.
12. Drafting and delivering the mandated Annual Privacy Report.
13. Conducting an audit of the privacy and security programs by an independent auditing organization (e.g., KPMG).
14. Hiring a privacy consultant (E&Y) to assist in the development of these work products.
15. In addition, in its current GRC SDG&E proposed adding two new positions to assist in the management of these newly developed and mandated privacy capabilities.

Added on May 7, 2015:

As mentioned above, SDG&E did not track customer privacy costs until the department was formed in late 2012. In its response to ORA-SDG&E-051-TLG, Q. 20-c, SDG&E inadvertently excluded its privacy-related costs that were incurred once the Customer Privacy department was formed. Therefore, provided below are the costs incurred during 2012 and 2013 for the Customer Privacy cost center, which is included in the Customer Programs and Projects workgroup 100011.000 reference SDG&E-14-WP-R pgs. 155-165.

In 2013\$ (000) Incurred Costs								
Adjusted-Recorded								
Years	2012				2013			
	Labor	Non-Labor	Total	FTE's	Labor	Non-Labor	Total	FTE's
Customer Privacy Cost Center	30	0	30	0.2	193	275	468	2.1
Note: Totals may include rounding differences								

Appendix A
SDG&E Responses to Data Requests

Attachment A.8 UCAN-SEU-DR-02, Q4

**UCAN DATA REQUEST
UCAN-SEU-DR-02
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: MARCH 24, 2015
DATE RESPONDED: APRIL 7, 2015**

4. Regarding the Bill Redesign project:
- a. Please provide the total expenditure to date on the bill redesign project including costs for all focus groups, surveys and other efforts.
 - b. Please provide a detailed breakdown of (i) past and (ii) forecasted expenditures for the bill redesign project by general category including: focus groups, customer studies, bill design, implementation, etc. Please expand on this list of categories as appropriate.

Utility Response:

- a. Prior to project approval, routine labor and non-labor expenses are not tracked to the specific project. SDG&E did incur an expense of \$36,000 to conduct focus groups. SDG&E is not requesting any incremental O&M dollars for Bill Redesign in its TY 2016 GRC request.
- c. (i) The past expenses for the Bill Redesign project include \$36,000 for the focus groups as provided for in the response to Question 4a above.
(ii) Forecasted capital expenditures for the Bill Redesign project are shown below by the labor and non-labor categories. Further delineated non-labor categories are currently not forecasted for GRC purposes. The forecasted expenditures are outlined in the workpapers of witness Stephen Mikovits for which a copy can be found on pages 265-267 of Brad Baugh's revised workpapers dated March 2015.

Year	Labor	Non-Labor	Total
2014	\$0	\$0	\$0
2015	\$1,449,000	\$480,000	\$1,929,000
2016	\$1,094,000	\$300,000	\$1,394,000

Appendix A
SDG&E Responses to Data Requests

Attachment A.9 Energy Division informal data request Q4 - SDG&E response dated 2/12/15

1. Please provide SDG&E's forecast of residential hourly metered loads (net of behind the meter self-generation) for 2021 scaled (if necessary) to be consistent with the annual energy and residential peak demand in the 2013 IEPR Mid load case residential forecast for 2021, and consistent with the behind-the-meter PV generation embedded in that forecast.

SDG&E Response: Please see attached spreadsheet



SDG&E-2021-Residential-Hourly-Forecast

2. Please provide a five-year history of the number of service accounts that have enrolled in each of SDG&E's residential TOU rate schedules.

SDG&E Response: The chart below details SDG&E's residential TOU enrollments for the years 2010-2014.

SDG&E Residential TOU rates (2010-2014)

Year	Opt-in TOU rates	Solar TOU Rates	Electric Vehicle TOU rates	Total
2010	1,844	-	1	1,845
2011	1,736	413	554	2,703
2012	1,809	515	959	3,283
2013	2,175	913	2,635	5,723
2014	2,667	1,416	4,791	8,874

3. Please provide SDG&E's annual forecast of the number of residential accounts participating in its residential TOU rates for 2015 through 2019.

SDG&E Response: Based on existing processes and funding levels, the chart below includes forecasts for SDG&E's currently active TOU rates which include solar and electric vehicle rates, opt-in TOU rates that we expect to be active beginning 2015 along with the proposed opt-in TOU pilot rates. The Opt-in TOU forecasts remain constant after 2016, as current funding for Opt-in TOU marketing, education and outreach efforts will end December 2016.

SDG&E Forecasted Residential TOU rates (2015-2019)

Year	Opt-in TOU rates	Solar TOU Rate	Electric Vehicle TOU rates	Total
2015	13,000	2,200	9,700	24,900
2016	75,000	3,300	17,800	96,100
2017	75,000	4,700	26,500	106,200
2018	75,000	6,500	34,500	116,000
2019	75,000	8,700	44,000	127,700

4. Does SDG&E plan to develop specific numeric opt-in TOU enrollment targets for the period 2015-2019 once a decision in R.12-06-013 is issued?

SDG&E Response: Future (2017-2019) TOU enrollment targets are contingent upon the following three pending proceedings:

- SDG&E's 2015 RDW (A.14-01-027) –changes to TOU period definitions
- SDG&E's residential rate proposals submitted in the Residential Rate Reform OIR (R.12-06-013) – Optional un-tiered TOU rate proposal and TOU pilot proposal
- SDG&E's GRC Phase 1 application filed on November 14, 2014 A.14-11-003 – ME&O funding for SDG&E's residential Opt-in TOU rates.

It is SDG&E's position that the new optional un-tiered time of use rate proposed in the RROIR proceeding is a much simpler option for residential customers and has the potential to provide

customers with greater benefits. As such, greater awareness and understanding will drive higher customer acceptance and subsequent opt-in TOU enrollments. Subject to additional approvals along with updates as new information is gathered, SDG&E provides the following potential customer enrollment projections:

Year	Opt-in TOU rates	Solar TOU Rate	Electric Vehicle TOU rates	Total
2015	13,000	2,200	9,700	24,900
2016	75,000	3,300	17,800	96,100
2017	90,000	4,700	26,500	121,200
2018	155,000	6,500	34,500	196,000
2019	155,000	8,700	44,000	207,700

- 2015: 13,000 incremental residential on TOU
- 2016: 62,000 incremental residential on TOU of which a portion of the enrollment is contingent upon GRC Phase 1*
- 2017-2018: 15,000 annually incremental residential on TOU contingent upon GRC Phase 1*
- 2018: 50,000 incremental residential on TOU contingent upon approval for a residential default TOU pilot**

* In the event that SDG&E receives approval of SDG&E's GRC Phase 1 application A.14-11-003, there would be an incremental increase of residential customers on opt-in TOU rates. Prior to further scoping, SDG&E is including a placeholder of 15,000 in years 2016, 2017 and 2018.

** In the event that SDG&E receives authority to implement a default there would be an incremental increase of residential customers on TOU rates associated with the pilot. Prior to further scoping of what would be the appropriate sample size of such a pilot, SDG&E is including a placeholder value of 50,000.

5. SMUD achieved a 16% enrollment in its opt-in residential TOU pilot over 2012 and 2013. Scaled to SDG&E's residential customer population, 16% enrollment would equate to about 175,000 customers. Does SDG&E believe that 175,000 customers would be a

reasonable enrollment target by 2021 for its proposed opt-in TOU rates? If not, what enrollment target does SDG&E consider to be reasonable by 2021, and why?

SDG&E response: Based on the enrollment projections identified in Q4 above, SDG&E believes 175,000 residential customers enrolled on a TOU rate is an achievable enrollment target by 2021.

6. What resources would SDG&E require to achieve an opt-in residential TOU enrollment of 175,000 customers, and when, in SDG&E's estimation, could SDG&E achieve that enrollment level?

SDG&E Response: As noted in Question 4, if SDG&E receives timely approval for all currently requested pilots and associated funding, SDG&E anticipates the ability to achieve 175,000 enrollments by 2018.

7. Salt River Project (in Arizona) has achieved a 30% enrollment in its opt-in residential TOU rate programs. Scaled to SDG&E's residential customer population, 30% enrollment would equate to about 350,000 customers. Does SDG&E believe that 350,000 customers would be a reasonable enrollment target by 2025 for its proposed opt-in TOU rates? If not, what percentage of residential enrollment in TOU rates does SDG&E consider to be reasonable by 2025, and why?

SDG&E Response: The Salt River Project (SRP) began offering TOU rate programs during the early 1980's and began testing different TOU rates in 1988^[1]. The 30% enrollment rate has been achieved over the course of more than 30 years, with the benefit of time to build customer understanding and test various outreach and education options. SRP also has a very warm climate with its residential central air-conditioning (CAC) saturation at close to 100%,

^[1] Effects of Three-Hour On-Peak Time-of-Use Plan on Residential Demand during Hot Phoenix Summers, by Loren Kirkeide, The Electricity Journal, [Volume 25, Issue 4](#), May 2012, Pages 48–62, <http://www.sciencedirect.com/science/article/pii/S104061901200111X>

compared to SDG&E's saturation level of 48%. Additionally, high temperatures in Arizona result in significant air-conditioning usage throughout the service territory, whereas the moderate San Diego climate results in lower use of air-conditioning, particularly near the coast.

As noted in Question 4 and 6, if SDG&E receives timely approval for all currently requested pilots and associated funding, SDG&E anticipates the ability to achieve 175,000 enrollments by 2018. At this time, SDG&E believes other factors would need to be present and considered that are not apparent today if it were to achieve 350,000 residential TOU customers by 2025.

8. What resources would SDG&E require to achieve an opt-in residential TOU enrollment of 350,000 customers, and when, in SDG&E's estimation, could SDG&E achieve that enrollment level?

SDG&E Response: It is not possible to respond to this question without engaging in speculation due to the large number of unknown variables that will impact customer enrollment. As stated in the response to question 6, determining the necessary resources or enrollment targets will ultimately depend on factors that are unknown at this time including the rate design that is adopted in R.12-06-013.

9. Both the CPUC and the California Energy Commission consider TOU rates to be (non-event-based) demand response. (See, 2013 CEC IEPR p.73; D.08-04-050, Attachment A, p.80.). Does SDG&E intend to request funding in a forthcoming Demand Response proceeding for the purposes of expanding enrollment in its opt-in residential TOU rate program?

SDG&E Response: SDG&E's last Demand Response ("DR") cycle ended in 2014, and current DR programs are in their first year of a two-year bridge funding period for 2015-2016. The CPUC authorized this Bridge funding in D.14-05-025. The authorized bridge funding includes a consolidation of education and outreach costs related to dynamic pricing pursuant to Commission direction in D.12-12-004 (at page 56),

"(W)e require SDG&E to recover post-2015 costs related to the dynamic rates adopted in this decision in its future Demand Response Program and Budget cycle applications. This treatment will allow a review of any ongoing costs, including education and outreach costs related to dynamic pricing, in the context of an examination of similar activities. We believe that this will best ensure that SDG&E coordinates its future education and

outreach efforts for energy efficiency, demand response, and dynamic pricing tariffs, and should assist in avoiding duplicative activities and expenditures.”

Based on the above direction, SDG&E could potentially request future funding for dynamic rate education and outreach costs.

10. If SDG&E's response to Q.9 is "no", does SDG&E intend to request funding to expand enrollment in its opt-in residential TOU rate program in any forthcoming proceeding? If so, please specify that proceeding.

SDG&E Response: N/A

11. How will SDG&E evaluate the reasonableness and effectiveness of the costs required to meet opt-in enrollment targets? What benchmarks or best practices will SDG&E consult to determine whether its investments in expanding opt-in enrollment are reasonable?

SDG&E Response: SDG&E is required to evaluate its new optional TOU and TOU plus rates according to the load impact protocols. SDG&E will also benefit from SMUD's recent residential TOU pilots in designing its pilot proposals. To maximize marketing cost effectiveness, SDG&E will initially target customers that can most benefit and immediately save money by switching to a TOU rate. Customers will be identified based upon historical usage and bill amounts. SDG&E has proposed to conduct a test and learn approach to recruiting customers for its optional residential TOU rates. Utilizing customer segmentation information, the test and learn approach will provide insights into the marketing and solicitation of residential customers who will benefit on a TOU rate. As part of the test and learn approach, SDG&E will also compare its costs to other utility time-based pricing programs, but differing factors as stated above will be considered.

As previously mentioned SDG&E proposed to conduct both an opt-in and default TOU pilot in the RROIR proceeding. If SDG&E is authorized to conduct those pilots, it will be able to assess load impacts and feasibility of its enrollment targets in its load impact evaluations.

Appendix A
SDG&E Responses to Data Requests

Attachment A.10 ORA-SDG&E-DR-072-TLG, Q1b

ORA DATA REQUEST
ORA-SDG&E-DR-072-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 23, 2015
DATE RESPONDED: MARCH 9, 2015

Exhibit Reference: SDG&E-14

Subject: Customer Service Operations, Information, and Technologies

Please provide the following:

1. SDG&E's forecasts \$67.584 million (\$66.605 million for Non-Shared, and \$0.979 million for Shared Services) for Test Year 2016 for its Customer Service Operations, Information, and Technologies Operations and Maintenance (O&M) expenses. This is an increase of \$9.433 million or 16.22% over 2013 recorded adjusted expenses of \$58.151 million. The five year average (2009-2013) is \$57.230 million.
 - a. Provide recorded adjusted expenses for 2009-2013 and 2016 forecast data for SDG&E's Advanced Metering work group that is shown in Table 6 on page BMB-13. If there is no recorded historical data for a particular line item listed in the table, state so in the response.
 - b. Provide recorded adjusted expenses for 2009-2013 and 2016 forecast data for SDG&E's Billing work group that is shown in Table 9 on page BMB-21. If there is no recorded historical data for a particular line item listed in the table, state so in the response.
 - c. Provide recorded adjusted expenses for 2009-2013 and 2016 forecast data for SDG&E's Residential Customer Services work group that is shown in Table 34 on page BMB-65. If there is no recorded historical data for a particular line item listed in the table, state so in the response.
 - d. Provide recorded adjusted expenses for 2009-2013 and 2016 forecast data for SDG&E's Commercial & Industrial Services work group that is shown in Table 37 on page BMB-79. If there is no recorded historical data for a particular line item listed in the table, state so in the response.
 - e. Provide recorded adjusted expenses for 2009-2013 and 2016 forecast data for SDG&E's Customer Programs & Projects work group that is shown in Table 45 on page BMB-106. If there is no recorded historical data for a particular line item listed in the table, state so in the response.

SDG&E Response:

- a. Please see ORA-SDG&E-DR-072-TLG Q1a Attachment.pdf.
- b. Please see ORA-SDG&E-DR-072-TLG Q1b Attachment.pdf, ORA-SDG&E-DR-072-TLG Q1b-NEM Attachment.pdf, and ORA-SDG&E-DR-072-TLG Q1b-IntervalBilling Attachment.pdf.
- c. Please see ORA-SDG&E-DR-072-TLG Q1c Attachment.pdf.

**ORA DATA REQUEST
ORA-SDG&E-DR-072-TLG
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 23, 2015
DATE RESPONDED: MARCH 9, 2015**

SDG&E Response to Question 1 continued:

- d. Please see ORA-SDG&E-DR-072-TLG Q1d Attachment.pdf.
- e. Please see ORA-SDG&E-DR-072-TLG Q1e Attachment.pdf.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	
1																															
2																															
3	in Constant 2013\$ (000)																														
4	Billing Customer Service 100002.000		2009				2010				2011				2012				2013				TY2016 Forecast				TY2016 - 2013 Change as shown in Exh. SDG&E-14 Table 9 page BMB-21				
5			Cost Driver		Labor	NLbr	Total	FTE	Labor	NLbr	Total	FTE	Labor	NLbr	Total	FTE	Labor	NLbr	Total	FTE	Labor	NLbr	Total	FTE	Labor	NLbr	Total	FTE	Labor	NLbr	Total
6	Net Energy Metering		\$116	\$5	\$121	2.0	\$116	\$5	\$121	2.0	\$175	\$8	\$182	3.0	\$233	\$10	\$243	4.0	\$349	\$15	\$364	6.0	\$590	\$25	\$615	10.0	\$241	\$10	\$251	4.0	See ORA-SDG&E-DR-072-TLG Q1b-NEM Attachment.pdf.
7	New Rate Options & Programs		\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$166	\$3	\$169	2.4	\$198	\$7	\$205	3.0	\$251	\$7	\$258	3.6	\$397	\$13	\$410	5.0	\$397	\$13	\$410	5.0	The costs for this activity shown in 2010-2013 were charged to the SPP Balancing Account and are not included in GRC historical adjusted recorded expenditures. These costs transition to the GRC in TY2016 from SPP. See footnote 1.
8	Increased Complexity of Activities		\$30	\$1	\$31	0.4	\$30	\$1	\$31	0.4	\$30	\$1	\$31	0.4	\$74	\$3	\$77	1.0	\$74	\$3	\$77	1.0	\$157	\$5	\$162	2.0	\$83	\$3	\$86	1.0	See ORA-SDG&E-DR-072-TLG Q1b-IntervalBilling Attachment.pdf.
9	Capital Project Impacts - Off But Registering Capital Project #14005 labor savings		\$46	\$3	\$49	1.0	\$46	\$3	\$49	1.0	\$46	\$3	\$49	1.0	\$46	\$3	\$49	1.0	\$46	\$3	\$49	1.0	(\$8)	\$0	(\$8)	0.0	(\$54)	(\$3)	(\$57)	-1.0	
10	Capital Project Impacts - Centralized Calculation Engine Capital Project \$#14013 labor costs				\$0				\$0				\$0				\$0				\$0		\$73	\$3	\$76	1.0	\$73	\$3	\$76	1.0	Net new activity, no historical costs.
11	Totals		\$192	\$9	\$201	3.4	\$192	\$9	\$201	3.4	\$416	\$14	\$430	6.8	\$551	\$22	\$573	9.0	\$721	\$27	\$748	11.6	\$1,210	\$46	\$1,255	18.0	\$740	\$26	\$766	10.0	
12																															
13	Note: Totals may include rounding differences.																														
14																															
15	Historical costs during 2010-2015 to perform these activities are booked to SDG&E's Dynamic Pricing Balancing Account pursuant to D.12-12-004.																														

	A	B	C	D	E	F	G	H	I
1	Year End Totals	2009	2010	2011	2012	2013	2014	2015	2016
2	Active Interval Billed Meters	7650	7722	8,874	25,843	34,755	64,486	150,629	220,557
3	Percent Growth		1%	15%	191%	34%	86%	134%	46%
4									
5	Required Training Tasks								
6	- Develop Training Material	0.2	0.2	0.2	0.5	0.6	0.8	1.0	1.1
7	- Deliver Training	0.1	0.1	0.1	0.3	0.4	0.5	0.6	0.7
8	- Job Aids and Bulletins	0.1	0.1	0.1	0.2	0.2	0.3	0.4	0.5
9	Total FTE Requirement	0.4	0.4	0.4	1.0	1.2	1.6	2.0	2.3
10	Labor - 2013 dollars	29,752	29,752	29,752	74,381	74,381			
11	Non-Labor - 2013 dollars	1,000	1,000	1,000	2,500	2,500			
12									
13	Proposed TY2016 GRC Incremental Increase					FTE	0.0	1.0	1.0
14									
15	Forecast Adjustment Assumptions								
16	Project Advisor (AD1) = Labor \$83,000					Labor	\$0	\$83,000	\$83,000
17	Project Advisor (AD1) = Non-Labor \$3,000					Non-Labor	\$0	\$3,000	\$3,000
18						Total	\$0	\$86,000	\$86,000
19									
20	Recent Upward Pressures								
21	Smart Meter Mass Deployment								
22	Growth of NEM and Electric Vehicle TOU Rates								
23									
24	Future Upward Pressures								
25	Continued Growth of NEM and Electric Vehicle TOU Rates								
26	Optional Small Commercial SPP Rates Starting May 2014								
27	Optional Residential SPP Rates Starting January 2015								
28	Mandatory Small Commercial SPP Rates Starting November 2015								
29									

ORA-SDG&E-DR-072-TLG Q.1b-NEM Attachment.pdf

	A	B	C	D	E	F	G	H	I	J	K
1	Year End Totals			<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>
2	Active NEM Accounts			7,926	11,721	15,726	20,987	31,916	44,700	62,600	87,600
3	Percent Growth			48%	34%	33%	52%	40%	40%	40%	
4	Average Number of New Customer Per Month			200	316	334	438	911	1,065	1,492	2,083
5											
6	Required NEM Tasks										
7	- New Setups			1.0	1.0	1.0	2.0	3.0	4.0	5.0	6.0
8	- Monthly Exception Handling and Maintenance			1.0	1.0	2.0	2.0	3.0	4.0	6.0	8.0
9	Total FTE Requirement			2.0	2.0	3.0	4.0	6.0	8.0	11.0	14.0
10											
11	FTE Reduction From NEM Enhancement Project							0.0	(1.0)	(2.0)	(4.0)
12											
13	FTE Requirement After NEM Enhancement Project							6.0	7.0	9.0	10.0
	Labor Costs:										
	(using blended rate from 6 resources										
14	on activity in 2013) - in 2013 dollars			116,390	116,390	174,585	232,780	349,170			
15	Non-Labor 2013 costs (assuming \$2500/FTE)			5,000	5,000	7,500	10,000	15,000			
16											
17	Proposed TY2016 GRC Incremental Increase										
18	(Required to support continued growth rate of 40%)							FTE	1.0	3.0	4.0
19											
20	Forecast Adjustment Assumptions										
21	Associate Billing Analyst (SA2) = Labor \$60,250							Labor	\$60,250	\$180,750	\$241,000
22	Associate Billing Analyst (SA2) = Non-Labor \$2,500							Non-Labor	\$2,500	\$7,500	\$10,000
23								Total	\$62,750	\$188,250	\$251,000
24											
25	Recent Upward Pressures										
26	AB920 - Excess Generation Credits										
27	NEM Combined Technology										
28											
29	Future Upward Pressures										
30	NEM Aggregation										

APPENDIX B

ORA Response to SEU-ORA-DR-3, Exhibit ORA-13, Q1a-e and Q2a-b



ORA

Office of Ratepayer Advocates
California Public Utilities Commission

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ORA Response to Sempra Energy Utilities' Data Request
San Diego Gas & Electric Co. Test Year 2016 General Rate Case, A.14-11-003
Southern California Gas Co. Test Year 2016 General Rate Case, A.14-11-004

Origination Date: April 30, 2015
Due Date: May 14, 2015
Response Date: May 14, 2015

To: Chuck Manzuk cmanzuk@semprautilities.com 1-858-654-1782
Billie Overturf boverturf@semprautilities.com 1-858-654-1779

From: Clayton Tang and Truman Burns, Project Coordinators
Office of Ratepayer Advocates
505 Van Ness Avenue, Room 4205
San Francisco, CA 94102

Response by: Tamera Godfrey
Phone: 415-703-1367
Email: tlg@cpuc.ca.gov

Data Request No: SEU-ORA-DR-3
Exhibit Reference: ORA-13
Subject: Office Operations, Information, and Technologies

The following is ORA's response to Sempra's data request. If you have any questions, please contact the responder at the phone number and/or email address shown above.

Q.1: Please provide the actual workpaper page or the Sempra Utility data request response attachment page that serves as the basis for the statements made throughout the prepared direct testimony by Ms. Tamera Godfrey in Exh. ORA-13, as shown below in a. through e., regarding one-time and non-recurring costs that were not removed. Please also explain the basis for ORA's assertion that these are one time and non-recurring expenses.

- a. Advanced Metering Operations on page 19, line 9:**
SDG&E's adjusted-recorded expenses (2009-2013) for its AMO also include overtime costs, and costs incurred for one-time, non-recurring and unusual activities (expenses incurred that are not necessary or required to operate the utility business).
- b. Billing on page 20, footnote 49:**
Ex. SDG&E-14, pp. BMB-21 to BMB-24. SDG&E has embedded historical costs associated its New Rate Options and Programs (i.e., one-time development costs, training costs, etc.) that can be reallocated in the TY for proposed activities. SDG&E's historical expenses also include one-time non-recurring and unusual costs (expenses incurred for activities that are not necessary or required to operate the utility business; SDG&E response to ORA-SDG&E-051-TLG, Q.9) that can be reallocated for TY activities.
- c. Residential Services on page 31, line 1:**
SDG&E's adjusted-recorded expenses (2009-2013) for its Residential Customer Services Group also include overtime costs, and costs incurred for one-time, non recurring and unusual activities (expenses incurred that are not necessary or required to operate the utility business).
- d. Commercial and Industrial Services on page 33, line 4:**
SDG&E's historical expenses (2009-2013) include costs incurred for one time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business), which are incorporated into ORA's TY 2016 estimate and which provides embedded funding that SDG&E can reallocate in the TY for proposed activities.
- e. Customer Programs & Projects on page 40, line 3:**
SDG&E's historical expenses (2009-2013) include costs incurred for one time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business), which are incorporated into ORA's TY 2016 estimate and which provides embedded funding that SDG&E can reallocate in the TY for proposed activities.

A.1 a-e:

Regarding "the actual workpaper page or the Sempra Utility data request response attachment page that serves as the basis for the statements" made in ORA's testimony regarding SDG&E's historical expenses (2009-2013) including costs incurred for one-time, non-recurring and unusual expenses (expenses incurred that are not necessary or required to operate the utility business), see SDG&E's response to ORA-SDG&E-051-TLG, Q.9.

As discussed in ORA's testimony on pages 19, 31, 33, and 40, SCG's historical expenses (2009-2013) include costs incurred for one-time, non-recurring and

unusual expenses (expenses incurred that are not necessary or required to operate the utility business).

According to SDG&E's ' responses to ORA-SDG&E-051-TLG, Q. 9, SDG&E did not remove all these costs: "For example, sporting event related activities are not separately identified from other employee reimbursable expenses." Since SDG&E did not separately identify all of these costs, they are still embedded in SDG&E's "dollars spent in 2009-2013" and are thus incorporated into ORA's TY 2016 estimate, which is based on a five year average. This provides embedded funding that SDG&E can reallocate in the TY for proposed activities for its Advanced Metering Operations, Billing, Residential Customer Services, Commercial and Industrial Services, and Customer Programs & Projects work groups.

ORA's review and analysis of SDG&E's 2009-2013 adjusted-recorded expenses provided in SDG&E's response to ORA-SDG&E-051-TLG, question 9 shows significant expense fluctuations from year to year for several line items demonstrating that the associated activities and related costs are not incurred at that expense level on a yearly basis (i.e., one-time and non-recurring expenses). Note that expenses associated with employee signing bonuses, employee meals, luncheons, entertainment, gift cards, employee recognition, holiday events, various corporate events, tickets to sporting events, certain employee/company dues and memberships, and employee laundry are a few examples of the type of expenses SDG&E incurred between 2009-2013 that are not necessary or required to operate the utility business. ORA did not remove these expenses from its estimate, which provides SDG&E with embedded costs that can be reallocated in the TY for proposed activities.

Regarding overtime costs included in 2009-2013 adjusted-recorded expenses for Advanced Metering Operations, see SDG&E's response to ORA-SDG&E-051-TLG, question 9.

**Advanced Metering Operations Expense
(in Thousands of 2013 Dollars)**

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast
Labor	\$4,681	\$5,070	\$4,870	\$7,311	\$7,556	\$7,503	\$8,090	\$7,556
Non-Labor	608	514	552	842	579	532	681	579
Total	\$5,289	\$5,584	\$5,422	\$8,153	\$8,135	\$8,035	\$8,771	\$8,135

Regarding embedded costs included in 2009-2013 adjusted-recorded expenses for Billing, see SDG&E's response to ORA-SDG&E-051-TLG, question 9. As discussed in ORA's testimony on page 21, SDG&E requested \$5.765 million and was authorized \$5.543 million in its 2012 GRC for its Billing work group. (SDG&E response to ORA-SDG&E-051-TLG, Q.6). SDG&E's 2012-2014 adjusted-recorded expenses for this work group averaged

\$4.957 million.

Billing Expenses
(in Thousands of 2013 Dollars)

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast
Labor	\$4,321	\$4,237	\$4,037	\$4,687	\$4,768	\$4,428	\$5,508	\$4,900
Non-Labor	231	374	328	316	305	368	331	310
Total	\$4,552	\$4,611	\$4,365	\$5,003	\$5,073	\$4,796	\$5,839	\$5,210

Regarding overtime costs included in 2009-2013 adjusted-recorded expenses for Residential Customer Services, see SDG&E's response to ORA-SDG&E-051-TLG, Q.9.

Residential Customer Services Expense
(in Thousands of 2013 Dollars)

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast
Labor	\$1,688	\$1,421	\$1,832	\$2,471	\$2,579	\$2,257	\$2,903	\$2,579
Non-Labor	1,769	1,421	1,616	1,634	2,997	2,079	3,703	2,997
Total	\$3,457	\$2,842	\$3,448	\$4,105	\$5,576	\$4,336	\$6,606	\$5,576

Commercial and Industrial Services Expense
(in Thousands of 2013 Dollars)

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast
Labor	\$4,599	\$4,563	\$4,311	\$4,447	\$4,418	\$4,220	\$4,827	\$4,418
Non-Labor	665	579	894	958	887	492	962	887
Total	\$5,264	\$5,142	\$5,205	\$5,405	\$5,305	\$4,712	\$5,789	\$5,305

Customer Programs & Projects Expense
(in Thousands of 2013 Dollars)

Description	2009	2010	2011	2012	2013	2014	SDG&E 2016 Forecast	ORA 2016 Forecast
Labor	\$905	\$943	\$976	\$1,453	\$1,418	\$1,396	\$1,920	\$1,418
Non-Labor	1,391	852	808	973	1,303	789	1,518	1,436
NSE ¹	-	-	-	-	-	-	5	
Total	\$2,296	\$1,795	\$1,784	\$2,426	\$2,721	\$2,185	\$3,443	\$2,854

¹ Non-Standard Escalation (NSE).

Q.2: According to Exhibit No: ORA-13 p. 19, footnote 47 *“ORA’s forecast of \$5.210 million includes incremental funding of \$137,000 for SDG&E’s New Rate Options Program. ORA normalized SDG&E’s forecast (\$410,000/3 years = \$137,000) to calculate incremental TY funding.”*

- a. Please provide the workpaper that serves as the basis for ORA’s calculation shown in footnote 47.
- b. Please also provide an explanation for what ORA means by “normalizing” and what the purpose is of normalizing an annual expenditure.

A.2-a:

ORA’s forecast of \$5.210 million for SDG&E’s Billing work group includes incremental funding of \$137,000 for SDG&E’s New Rate Options Program. ORA calculated the incremental funding as follows: $\$410,000/3 \text{ years} = \$137,000$ ($\$136,666$ rounded up to $\$137,000$).

A.2-b:

Regarding “an explanation for what ORA means by “normalizing” and what the purpose is of normalizing an annual expenditure”, please note the following: ORA normalized SDG&E’s forecast of \$410,000 (divided the forecasted amount over three years) for its New Rate Options Program because SDG&E has embedded funding that can be reallocated in the TY for this activity. As discussed on page 21 in ORA’s testimony, SDG&E requested \$5.765 million and was authorized \$5.543 million in its 2012 GRC for its Billing work group. SDG&E’s 2012-2014 adjusted-recorded expenses for this work group averaged \$4.957 million, which is less than its 2012 GRC authorized funding.

Q.3: According to Exhibit No: ORA-13 p. 29, footnote 76 *“SDG&E’s forecast for its Customer Data Analytics and Technical Studies of \$0.654 million (\$1.962 million over three years) includes \$0.327 million of non-labor costs “to fund various internal tools and consulting services” (Ex. SDG&E-14, p. BMB-68). SDG&E’s historical expenses include costs for completed projects and one-time costs (such as Manage Act Save program costs of \$0.938 million (SDG&E response to ORA-SDG&E-072-TLG, Q.1-c)) for various consulting services that can be reallocated in the TY “to fund various internal tools and consulting services” and additional funding over 2013 expense levels is not required for this activity (SDG&E response to ORA-SDG&E-051-TLG, Q.9).”*

- a. Please provide the detailed calculation showing the components that ORA used to compute the \$1.962 million stated above in addition to an explanation for dividing these annual costs by three.

A.3:

ORA calculated the \$1.962 million associated with SDG&E's Customer Data Analytics and Technical Studies TY forecast of \$0.654 million as follows: SDG&E's TY forecast of \$654,000 multiplied by 3 years = \$1,962,000.

Regarding "an explanation for dividing these annual costs by three", ORA did not divide SDG&E's forecast of \$0.654 million by three years. As discussed in ORA's testimony on page 29, ORA used SDG&E's 2013 adjusted-recorded expenses as a basis to calculate its estimate of \$5.576 million for SDG&E's Residential Customer Services expenses.

END OF RESPONSE

APPENDIX C
Supplemental Tables

Attachment C.1 Summary of Efficiencies included in Exhibit SDG&E-14
TY2016 GRC Forecast

APPENDIX C

Attachment C.1 Summary of Efficiencies included in Exhibit SDG&E-14 TY2016 Forecast

Workgroup	Testimony or WP Ref	Description of Efficiency	FTE Reductions	Hard Savings (\$)
AMO 100000.000	Exh. SDG&E-14 pg. BMB-15 Exh. SDG&E-14-WP-R pgs. 8-11 of 472	.5 FTE reduction in overtime for continuous improvements. Several process improvements are being implemented to reduce duplicate field visits. Enhanced tracking and reporting of root cause of repeat visits. Additional training on selecting appropriately skilled technicians based on the field work needed. Centralizing order creation to prevent duplicate order creation.	-0.5	\$ (64,000)
AMO 100000.000	Exh. SDG&E-14 pg. BMB-17 Exh. SDG&E-14-WP-R pgs. 8-11 of 472	Reduction for SDMDO contract labor, position eliminated.		\$ (79,000)
AMO 100000.000	Exh. SDG&E-14 pg. BMB-15 Exh. SDG&E-14-WP-R pgs. 10-11 of 472	2 FTE reduction for continuous improvements. SDG&E is developing management operating performance reports that allow for daily, weekly and monthly tracking of three primary metrics: average onsite minutes, average drive time and average % incomplete per job by order type, employee classification and employee name. This analysis and employee coaching will improve performance and enable SDG&E to complete the same volume of work with reduced staff.	-2	\$ (185,000)
AMO 100000.000	Exh. SDG&E-14 pg. BMB-15 Exh. SDG&E-14-WP-R pgs. 10-11 of 472	2 FTE reduction for continuous improvements. A Project Manager position has been eliminated whose responsibilities included responding to requests for data, running queries and other special projects. These responsibilities have been absorbed by the Smart Meter Technical Support group. A Field Advisor has also been eliminated. The responsibilities of this position included communicating new or updated company procedures and practices to the field and office employees (i.e. best practices, safety practices, and ergonomic practices). These tasks will now be handled by the field supervisors, team leads, and Customer Services Field Safety Advisor.	-2	\$ (195,000)
AMO 100000.000	Exh. SDG&E-14 pg. BMB-17-18 Exh. SDG&E-14-WP-R pgs. 8-11 of 472	Reduction of 1 FTE resulting from the implementation of SMOC-EM Project #13031. The solution will improve operational efficiencies and reduce device downtime by providing analysts with intelligent data (visual monitoring of the entire Smart Meter network and device connectivity issues) rather than just raw data from reports.	-1	\$ (100,000)
BILLING 100002.000	Exh. SDG&E-14 pg. BMB-25-26 Exh. SDG&E-14-WP-R pgs. 29 of 472	Reduction of 1 FTE resulting from the implementation of the Off But Registering Billing (OBR) Enhancement capital project #14005. The project will alleviate the amount of manual work involved in the existing OBR process.	-1	\$ (57,000)
CREDIT & COLLECTIONS 100003.000	Exh. SDG&E-14 pg. BMB-29-30 Exh. SDG&E-14-WP-R pgs. 40-43 of 472	1 FTE reduction in 2016 for continuous improvements. Reduction in labor for one full-time Associate Customer Payments Specialist due to the redesign of processes that allow for efficiencies to be achieved in the daily and monthly account reconciliation processes, such as reducing redundant data entry.	-1	\$ (53,000)

APPENDIX C

Attachment C.1 Summary of Efficiencies included in Exhibit SDG&E-14 TY2016 Forecast

Workgroup	Testimony or WP Ref	Description of Efficiency	FTE Reductions	Hard Savings (\$)
CREDIT & COLLECTIONS 100003.000	Exh. SDG&E-14 pg. BMB-30 Exh. SDG&E-14-WP-R pgs. 41-43 of 472	2 FTE reduction in 2016 for continuous improvement. Reduction in labor for two full-time Account Management Specialists due to process redesign and elimination of manual processes in the collection of delinquent commercial accounts. In one example, Credit and Collections generated communications related to delinquent large commercial accounts to appropriate account executives. The process was streamlined such that the account executives have direct access to these reports.	-2	\$ (113,000)
CREDIT & COLLECTIONS 100003.000	Exh. SDG&E-14 pg. BMB-30 Exh. SDG&E-14-WP-R pgs. 41-43 of 472	Reductions for licensing costs for SDG&E's old collections system that was included in the 2013 base year.		\$ (32,000)
CREDIT & COLLECTIONS 100003.000	Exh. SDG&E-14 pg. BMB-30 Exh. SDG&E-14-WP-R pgs. 41-43 of 472	Reduction for one-time vendor implementation costs to set-up and configure the new system that was included in the 2013 base year.		\$ (36,000)
REMITTANCE PROCESSING 100004.000	Exh. SDG&E-14 pg. BMB-33 Exh. SDG&E-14-WP-R pgs. 53-61 of 472	Paperless adoption-non postage savings related to electronic bills (i.e. reduction in toner, envelopes).		\$ (52,000)
POSTAGE 100004.001	Exh. SDG&E-14 pg. BMB-35-36 Exh. SDG&E-14-WP-R pgs. 64-74 of 472	Paperless adoption-Postage Savings.		\$ (790,000)
BRANCH OFFICES 100005.000	Exh. SDG&E-14 pg. BMB-38 Exh. SDG&E-14-WP-R pgs. 80 of 472	Reduction for continuous improvements. Implementing a new Capacity Model for forecasting staffing requirements in the Branch Offices. 5.5 FTE's reduction in 2016	-5.5	\$ (285,000)
CCC Operations 100006.000	Exh. SDG&E-14 pgs. BMB-53-54 Exh. SDG&E-14-WP-R pgs. 90-94 of 472	Reduction in Overtime pay.	3.6	\$ (46,000)
CCC Operations 100006.000	Exh. SDG&E-14 pgs. BMB-53-54 Exh. SDG&E-14-WP-R pgs. 90-94 of 472	Change in operating hours per AL 2585-E/2279-G Approved 5/2014 implementation date July 2014. Reduction of 3 FTE's in 2016.	-3	\$ (145,000)
CCC Operations 100006.000	Exh. SDG&E-14 pg. BMB 49-57 Exh. SDG&E-14-W-R pgs. 89-103 of 472	SEAD Phase 1 #13009, SEAD Phase 2 #14017 (7.3 FTE Reduction) Capital project will make it easier for ESS to obtain customer information and guide the conversation with customers, thus reducing the average handle time. Reduction of 7.3 FTE's in 2016	-7.3	\$ (352,000)
CCC Operations 100006.000	Exh. SDG&E-14 pg. BMB 49-57 Exh. SDG&E-14-W-R pgs. 89-103 of 472	IVR Phase 4 #14017 Reduction in the number of calls to the CCC as more transactions will be diverted to the IVR for self-service. Reduction of 4 FTE's 2016.	-4	\$ (193,000)
COMMERCIAL & INDUSTRIAL SERVICES 100009.000	Exh. SDG&E-14 pg. BMB-38 Exh. SDG&E-14-WP-R pgs. 137-138 of 472	.2 FTE reduction process improvements identified in the Planned Outage area. Optimized customer contact process by contacting certain customer groups via telephone rather than making field visits.	-0.2	\$ (8,000)
Total Efficiencies			-25.9	\$ (2,785,000)

APPENDIX C
Supplemental Tables

Attachment C.2 Smart Pricing Program (SPP) Historical and Forecasted Expenses

APPENDIX C

Attachment C.2 Smart Pricing Program (SPP) Historical and Forecasted Expenses

The Smart Pricing Program ("SPP") was established in 2010 to implement the new rate options, customer tools and other provisions adopted by CPUC Decision 12-12-004. Decision 12-12-004 approved funding for SPP through SDG&E's Dynamic Pricing Balancing Account (DPBA) for the period 2010-2015. D.12-12-004 authorized SDG&E to request funding for post-2015 operational costs for SPP as part of a future GRC (see pages 16-17 and Ordering Paragraph 15 of D.12-12-004) as the DPBA is ending. The post-2015 operational costs required to continue to support SPP that is being requested in the Customer Service Operations, Information and Technologies testimony of Brad Baugh Exhibit SDG&E-14 are shown below. This table does not represent the full SPP costs, only the positions and non-labor forecasted in TY2016 GRC. Costs during 2010-2015 to perform these activities are booked to the DPBA pursuant to D.12-12-004.

Workpaper Group	Cost Driver	2010				2011				2012				2013				2014				2015 - SPP- Dynamic Pricing Forecast				TY 2016 - GRC Forecast			
		Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE	Labor	Non-Labor	Total	FTE
100002 (Billing) Testimony Page BMB-22-24	New Rate Options and Programs	\$0	\$0	\$0	0.0	\$166	\$3	\$170	2.4	\$198	\$7	\$205	3.0	\$251	\$7	\$258	3.6	\$243	\$4	\$247	5.0	\$271	\$137	\$408	5.0	\$397	\$13	\$410	5.0
100006 (Customer Contact Center) Testimony Page BMB-54-55	New Rate Options and Programs	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$34	\$0	\$34	0.7	\$50	\$3	\$53	1.0	\$97	\$0	\$97	2.0
100008 (Residential Services) Testimony Page BMB-65-66	Energy Management Tool - Product Manager	\$0	\$0	\$0	0.0	\$82	\$1	\$83	1.0	\$7	\$147	\$154	1.0	\$45	\$87	\$132	1.0	\$49	\$0	\$49	0.6	\$97	\$3	\$100	1.0	\$95	\$3	\$98	1.0
100008 (Residential Services) Testimony Page BMB-66	Energy Management Tool licensing, hosting & maintenance	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$214	\$214	0.0	\$0	\$359	\$359	0.0	\$0	\$257	\$257	0.0	\$0	\$257	\$257	0.0	\$0	\$657	\$657	0.0
100008 (Residential Services) Testimony Page BMB-67-70	Customer Data Analytics & Technical Studies	\$33	\$0	\$33	0.3	\$179	\$3	\$182	1.9	\$172	\$5	\$177	2.0	\$223	\$5	\$228	2.5	\$249	\$2	\$251	2.5	\$235	\$6	\$241	2.5	\$230	\$7	\$237	2.5
100008 (Residential Services) Testimony Page BMB-68-70	Customer Data Analytics & Technical Studies - Tools/Consulting	\$0	\$0	\$0	0.0	\$0	\$470	\$470	0.0	\$0	\$155	\$155	0.0	\$0	\$103	\$103		\$0	\$458	\$458	0.0	\$0	\$1,000	\$1,000	0.0	\$0	\$327	\$327	0.0
100009 (Commercial & Industrial Svcs) Testimony Page BMB-79	New Rate Options and Programs	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$0	\$0	\$0	0.0	\$30	\$0	\$138	0.3	\$259	\$8	\$267	3.0	\$138	\$0	\$138	1.5
100010 (Customer Communications) Testimony Page BMB-96-97	Ongoing SPP Activities	\$9	\$0	\$10	0.2	\$222	\$4	\$225	2.7	\$241	\$7	\$248	3.0	\$243	\$5	\$248	2.8	\$265	\$2	\$267	3.0	\$269	\$8	\$277	3.0	\$255	\$0	\$255	3.0
100010 (Customer Communications) Testimony Page BMB-96-97	SPP Event Notifications and Goals and Alerts	\$0	\$0	\$0	0.0	\$0	\$143	\$143	0.0	\$0	\$918	\$918	0.0	\$0	\$612	\$612	0.0	\$0	\$298	\$298	0.0	\$0	\$500	\$500	0.0	\$0	\$376	\$376	0.0
100011 (Customer Programs and Projects) Testimony Page BMB-107-109	Ongoing SPP Activities	\$0	\$0	\$0	0.0	\$25	\$1	\$26	0.4	\$5	\$1	\$6	0.1	\$15	\$1	\$16	0.3	\$57	\$0	\$57	0.5	\$97	\$3	\$100	1.0	\$100	\$41	\$141	1.1
TOTAL		\$42	\$0	\$42	0.4	\$673	\$625	\$1,299	8.4	\$623	\$1,453	\$2,076	9.1	\$776	\$1,180	\$1,956	10.2	\$927	\$1,021	\$2,056	12.6	\$1,278	\$1,925	\$3,203	16.5	\$1,312	\$1,424	\$2,736	16.1

APPENDIX C
Supplemental Tables

Attachment C.3 2013 Payment Methods CARE/Non-CARE

APPENDIX C

Attachment C.3 2013 PAYMENT METHODS CARE/Non-CARE

CARE POPULATION		
CD_PMT_SRC_DESC	CountOfACCT_NBR	%
ALT PAYMNT LOCATION	152,170	6%
AUTO DEBIT APO PMTS	104,463	4%
BILLMATRIX	136,767	5%
BRANCH OFFICE	377,282	15%
CHECK FREE	214,747	8%
COLL AGENCY PAYMENT	11	0%
EA - LIHEAP	8,300	0%
EDI PAYMENTS	192	0%
ELECTRONIC RETURNS	9,081	0%
EXPRESSPAY	53,853	2%
MP 9400 PROC PMNT	925	0%
MP IMAGE PROC PMNT	650,051	26%
PHONE PAY APO PMTS	15,709	1%
PMT RECONCILIATION	33	0%
UNION BANK CONSOLID	203,571	8%
WEB BILL PAYMENT	615,718	24%
2,542,873	100%	

NON-CARE POPULATION		
CD_PMT_SRC_DESC	TRANSACTIONS	%
ALT PAYMNT LOCATION	146,794	1%
AUTO DEBIT APO PMTS	853,884	6%
BILLMATRIX	306,010	2%
BRANCH OFFICE	510,225	4%
CHECK FREE	1,881,566	14%
COLL AGENCY PAYMENT	4,047	0%
EA - LIHEAP	3,308	0%
EDI PAYMENTS	328,641	2%
ELECTRONIC RETURNS	101,224	1%
EXPRESSPAY	47,602	0%
MP 9400 PROC PMNT	432	0%
MP IMAGE PROC PMNT	4,265,381	32%
PHONE PAY APO PMTS	41,036	0%
PMT RECONCILIATION	1,048	0%
UNION BANK CONSOLID	963,167	7%
WEB BILL PAYMENT	3,851,077	29%
13,305,442	100%	

ENTIRE POPULATION		
CD_PMT_SRC_DESC	CountOfACCT_NBR	%
ALT PAYMNT LOCATION	298,964	2%
AUTO DEBIT APO PMTS	958,347	6%
BILLMATRIX	442,777	3%
BRANCH OFFICE	887,507	6%
CHECK FREE	2,096,313	13%
COLL AGENCY PAYMENT	4,058	0%
EA - LIHEAP	11,608	0%
EDI PAYMENTS	328,833	2%
ELECTRONIC RETURNS	110,305	1%
EXPRESSPAY	101,455	1%
MP 9400 PROC PMNT	1,357	0%
MP IMAGE PROC PMNT	4,915,432	31%
PHONE PAY APO PMTS	56,745	0%
PMT RECONCILIATION	1,081	0%
UNION BANK CONSOLID	1,166,738	7%
WEB BILL PAYMENT	4,466,795	28%
15,848,315	100%	

CARE POPULATION	SUMMARY	%
	APL's	6%
	Mail Payments	26%
	Home Banking	16%
	My Account	24%
	Other Self Serv	10%
	Other	0%
	Branches	15%
	Express Pay	2%
	100%	

NON-CARE POPULATION	SUMMARY	%
	APL's	1%
	Mail Payments	32%
	Home Banking	21%
	My Account	29%
	Other Self Serv	12%
	Other	0%
	Branches	4%
	Express Pay	0%
	100%	

ENTIRE POPULATION	SUMMARY	%
	APL's	2%
	Mail Payments	31%
	Home Banking	21%
	My Account	28%
	Other Self Serv	12%
	Other	0%
	Branches	6%
	Express Pay	1%
	100%	

In Person Payments ¹	23%
Self Service / Mail Payments ²	77%
100%	

In Person Payments ¹	5%
Self Service / Mail Payments ²	95%
100%	

In Person Payments ¹	8%
Self Service / Mail Payments ²	92%
100%	

¹In Person Payments (APL, Branches, Express Pay)

²Self Service / Mail Payments (Mail Payments, Home Banking, My Account, Other Self Service)

APPENDIX C
Supplemental Tables

Attachment C.4 Proximity of Branch Offices to Nearest APL's

APPENDIX C

Attachment C.4 Proximity of Branch Offices to nearest APL's

National City Branch Office	San Diego Branch Office
^c S&S Travel (E Plaza Bl) - 0.0 mi	^b Smart Corner Wireless (Broadway) - 0.37 mi
Walmart #5023 (Highland Ave) - 0.99 mi	Golden Hill Market (Market Street) - 1.22 mi
El Gallo Universal aka Envios Y Nouedades El Frijolito (S 43rd St) - 1.48 mi	^c Foodbowl Market (Cedar St) - 1.83 mi
^b Cozine's Grocery (Civic Center Dr) - 1.74 mi	Walmart #5638 (Imperial Ave) - 2.61 mi
Walmart #2291 (N Broadway) - 2.14 mi	^b David's Friendly Market (32nd St) - 2.17 mi
Walmart #5638 (Imperial Ave) - 3.24 mi	El Gallo Universal aka Envios Y Nouedades El Frijolito (S 43rd St) - 3.97 mi
^a Postal Annex (H St) - 3.30 mi	^b Cozine's Grocery (Civic Center Dr) - 4.60 mi
^b David's Friendly Market (32nd St) - 3.38 mi	Alpha Mini Mart (El Cajon Bl) - 4.64 mi
Hotwire Insurance (H St) - 3.49 mi	Walmart #5023 (Highland Ave) - 4.89 mi
^c Foodbowl Market (Cedar St) - 4.09 mi	Oceanside/Carlsbad Branch Office
Kmart #7636 (H St) - 4.46 mi	Walmart #2494 (Vista Wy) - 1.13 mi
Kmart #3076 (Sweetwater Rd) - 4.61 mi	Walmart #5075 (Marron Rd) - 1.60 mi
Walmart #2479 (College Ave) - 4.75 mi	Walmart #5637 (Mission Ave) - 3.17 mi
	^b Postnet (Oceanside Bl) - 3.30 mi
	International Services Express (Mission Ave) - 3.22
	^c TransTech One (Palomar Airport Rd) - 4.72 mi
	Walmart #2245 (College Ave) - 4.93 mi

^a Courtesy Phone

^b POSID

^c Courtesy Phone and POS ID

APPENDIX D

Customer Impact Report: Utility Outage Communication Preferences – Executive Summary

by J.D. Powers and Associates

Customer Impact Report: Utility Outage Communications Preferences



L. DENNIS SMITH, JEFF CONKLIN, AND CARL LEPPER
A Special Report by J.D. Power and Associates

July 2012



A Global Marketing Information Company
jdpower.com

EXECUTIVE SUMMARY

One of the most pressing issues facing customer service professionals in the utility industry is outage communications, or what could be more appropriately referred to as outage reporting and restoration updates. J.D. Power's utility industry clients have expressed much interest in the subject. Several utilities, especially in the Northeast, experienced significantly lower customer satisfaction scores in the past year as a result of major storms, and many of the customer complaints involved being kept updated on the status of power restoration.

There are several primary takeaways regarding outages:

- **Information is key.** From the perspective of customers, keeping them informed during outages is an integral part of the restoration process. Knowing the cause of an outage improves satisfaction among customers who experienced the outage. There is also a direct correlation between satisfaction improvement among these customers and the amount of information they received about it.
- **Customers want to receive information during outages.** Eight in 10 residential customers surveyed in the January/February fielding of the *2012 Electric Utility Residential Customer Satisfaction Study* say they want to receive information from their utility during an outage, either when they call in to check the status or proactively from the utility via telephone, text message, website, or various other channels.
- **Utilities should embrace new communication technologies and channels.** Customers who receive outage information through electronic sources, such as websites, email, and text messages, are more satisfied with their utility's outage performance than are those who do not receive information electronically.
- **Outage maps in particular please customers.** PQ&R satisfaction among the 10% of residential customers who experienced an outage of more than 5 minutes (defined by J.D. Power as an extended outage) and viewed an online outage map at the utility's website is 52 index points higher than among those who experienced an extended outage but did not view a map.
- **Utilities need to provide estimated times of restoration (ETR).** ETR is the most important point of information a utility can provide its customers—and customers demand it. However, the ETR needs to be precise. Customer satisfaction significantly declines as the gap between the ETR and the actual time to restore power widens.

The key is to be able to restore power slightly ahead of the ETR. While it is better to be early than late, being too early may also lower customer satisfaction, especially among business customers. Restoring power 10 minutes ahead of the estimated time results in the highest levels of customer satisfaction, with satisfaction beginning to decline at the 10-minute mark after the ETR. This is true of both business and residential customers. When an ETR is provided, restoration should be as close as possible to the estimate, not later. Some utilities have begun providing a window of time, which, while less precise than an ETR, offers customers more assurance that the utility will maintain its

.....

"From the perspective of customers, keeping them informed during outages is an integral part of the restoration process."

.....

Customer Impact Report: Utility Outage Communications Preferences

estimate. Although holding off on providing an ETR during major events until damage assessments can be made is a practice used by several utilities, customers still need to have some assurance they'll receive the ETR when it becomes available.

- **Providing the cause of the outage is also a vital point of information.** Residential customers are more satisfied with the outage experience when they receive this information. Higher satisfaction is not unexpected because, unlike ETRs, utilities can provide this information easily and accurately.
- **There are small differences in the ways utilities provide outage information to residential and business customers.** Most of the utilities that rate high among residential customers also rate high among business customers for providing outage and post-restoration information. However, J.D. Power data indicates that business customers seek out more outage information and are more appreciative of post-restoration callbacks.

Several utility representatives interviewed by J.D. Power agree that the advent of smartphones, text messaging, interactive voice response (IVR), and improved online capabilities have allowed utilities to provide information regarding power outages in a more cost-effective and efficient manner than relying on call centers. Utilities that take a proactive approach to providing customers with outage information often offer customers choices in the way they communicate with their utility. Providing customers with options on how they communicate and interact with their utility for different business needs is a driver of satisfaction, as J.D. Power studies have found that customers who contact their utility via electronic channels are more satisfied than are those who contact via traditional channels (e.g., telephone, mail). This is true as well for outage communications.

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APPENDIX E

Utility Residential Trusted Brand & Customer Engagement Study
by Market Strategies International

Utility Residential Trusted Brand & Customer Engagement Study

Product Experience Readout



BMB-E-2

Presented to:



Chris Oberle
Senior Vice President

May 13, 2015

Measuring Product Experience



BMB-E-3

2015 Study Approach

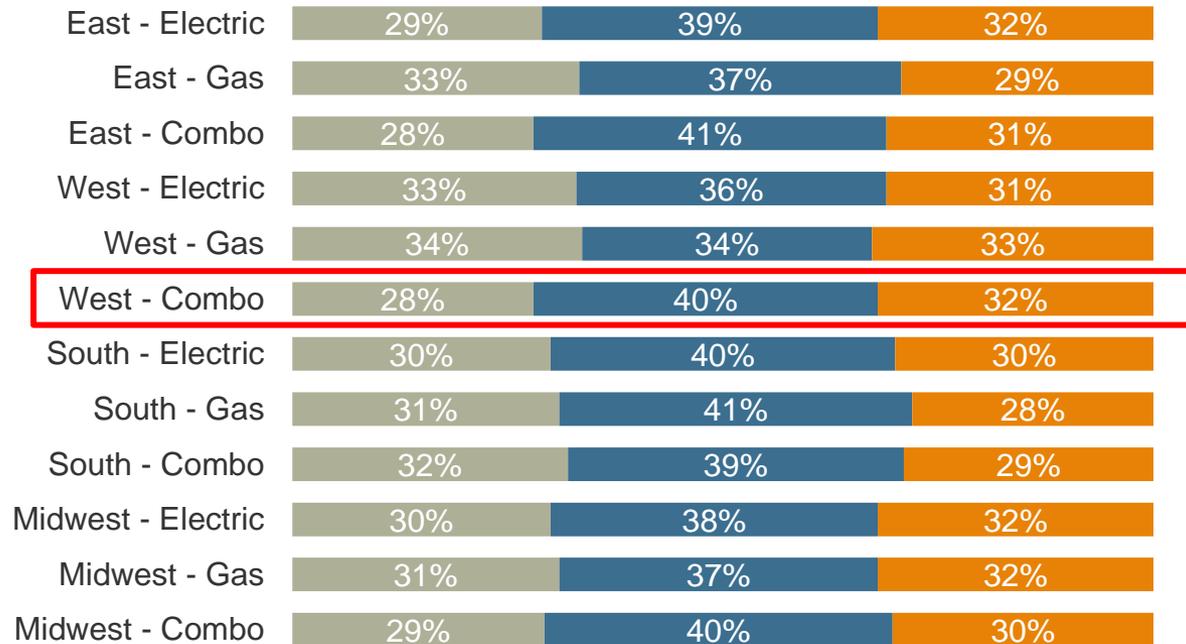
Market	Residential electric and natural gas utility customers
Data Collection	Online based upon demographically representative sample for each utility (according to census data)
Survey Length	19 minutes average (almost 150 questions)
Quarterly Fielding Waves	Q1: January - February Q2: April - May Q3: July - August Q4: October - November
Reporting Periods	Period 1: July (Focus on Trusted Brand) Period 2: December (Focus on Engaged Customer Relationship)
Sample	Quotas based upon age, income, race for demographic representativeness at individual utility level - Subscribers: 250 per quarter / 1,000 per year - Non-subscribers: 50 per quarter / 200 per year - Utilities can also provide own email sample for fielding
Targets	- 127 utility brands covered (59 electric with 300K+ customers, 38 natural gas with 230K+ customers, 30 combination providers with 550K+ combined counts) - Utilities can subscribe and be added to the study fielding
Benchmark Segments	12 segments: Region (E, MW, S, W) by type (electric only, natural gas only, combination). Top quartile in each segment designated as a top performer
External Communications	Media claim included in subscription fee

BMB-E-4

Localized models were developed for scoring Engaged Customer Relationship (ECR) levels

- 3 Components weighted based on importance by region and utility-type

> THE MODEL: CORE COMPONENT IMPORTANCE ON ENGAGED CUSTOMER RELATIONSHIP (ECR)



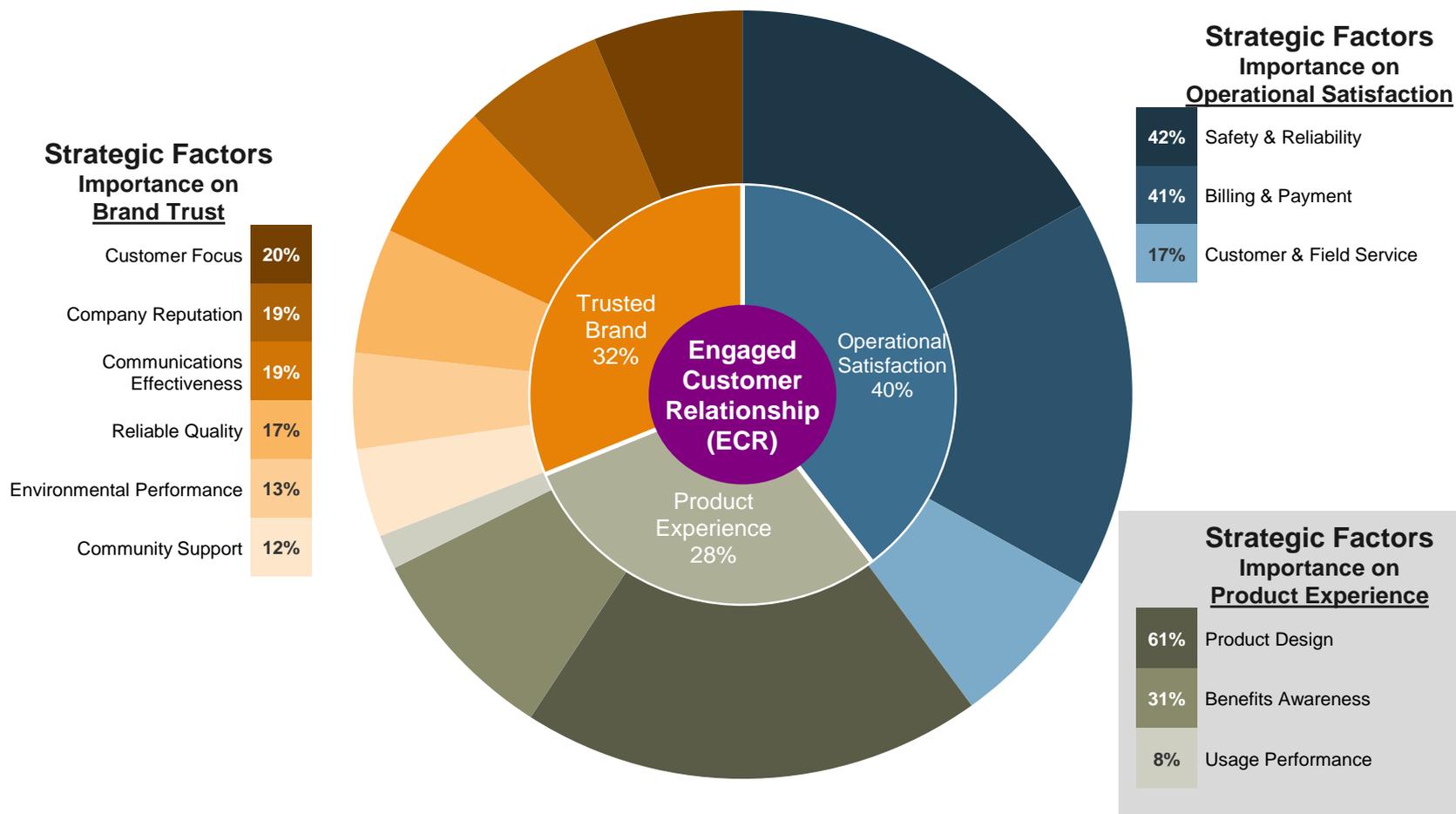
■ Product Experience Weight ■ Operational Satisfaction Weight ■ Brand Trust Weight

BMB-E-5

Bringing it all together – the ECR model

- A full report card on the utility from your customer's perspective

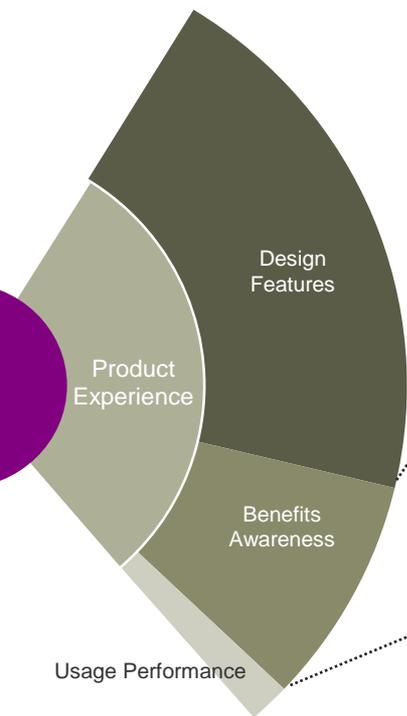
360° Customer Evaluation



BMB-E-6

12 Attributes Ratings questions contribute to Strategic Factor Index scores that comprise the Product Experience score

THE MODEL: TACTICAL ATTRIBUTES IMPORTANCE ON PRODUCT EXPERIENCE



	East			West			South			Midwest		
	Elec	Gas	Com									
Comprehensive Variety of High-Quality Programs	68%	61%	68%	61%	63%	61%	63%	65%	73%	60%	61%	64%
Encourages Use of “Smart Technology”	24%	26%	21%	24%	27%	22%	24%	29%	25%	23%	26%	24%
Clearly Explains Programs Offered	20%	20%	21%	21%	17%	21%	21%	19%	23%	23%	22%	20%
Encourages Online Services & Formats	17%	17%	19%	18%	19%	17%	18%	17%	16%	16%	16%	17%
Makes Information on Programs Easily Accessible	19%	18%	20%	18%	18%	20%	19%	18%	17%	19%	17%	19%
Easy to Enroll In or Start Programs	21%	20%	19%	19%	18%	20%	19%	17%	19%	20%	19%	20%
Relevance & Value of Offerings	25%	28%	24%	30%	28%	31%	28%	26%	20%	31%	28%	26%
Programs Help Reduce Utility Costs	28%	25%	24%	27%	25%	24%	26%	23%	21%	24%	28%	24%
Programs Improve Ease of Doing Business	19%	20%	21%	18%	28%	23%	21%	25%	20%	23%	22%	22%
Programs Help the Environment	17%	18%	20%	17%	15%	17%	17%	18%	13%	18%	16%	14%
Programs Encourage Energy Consciousness	19%	18%	16%	19%	15%	21%	20%	15%	22%	16%	16%	19%
Programs Improve Customer Service	16%	19%	19%	19%	17%	15%	17%	19%	24%	19%	18%	20%
Performance of Offerings Used	7%	11%	9%	9%	9%	8%	9%	8%	7%	9%	11%	10%
Programs Are Easy to Use	51%	51%	52%	50%	50%	50%	52%	52%	49%	51%	51%	51%
Programs Perform as Promised	49%	49%	48%	50%	50%	50%	48%	48%	51%	49%	49%	49%

BMB-E-7

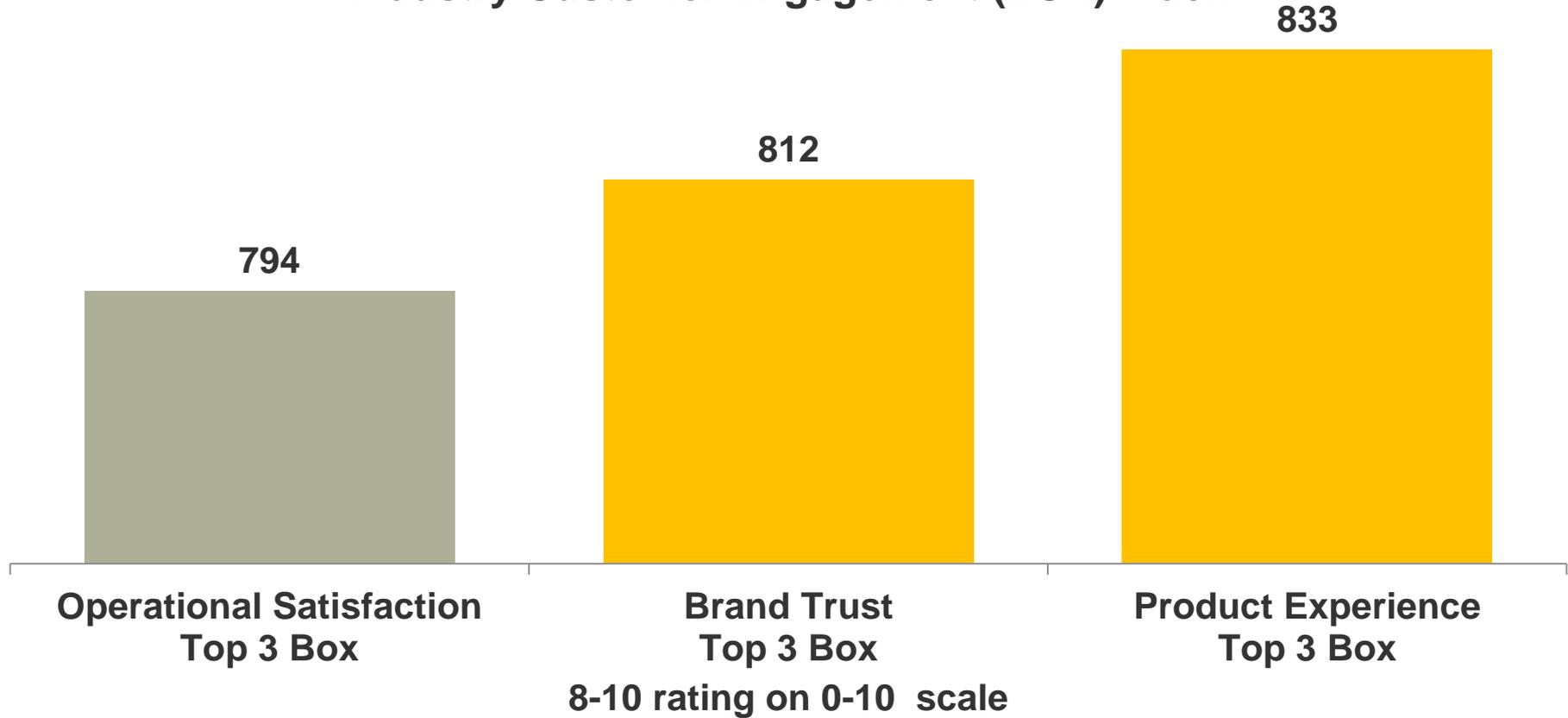
Performance Insights



BMB-E-8

High Brand Trust and Product Experience create greater Customer Engagement than High Operational Satisfaction

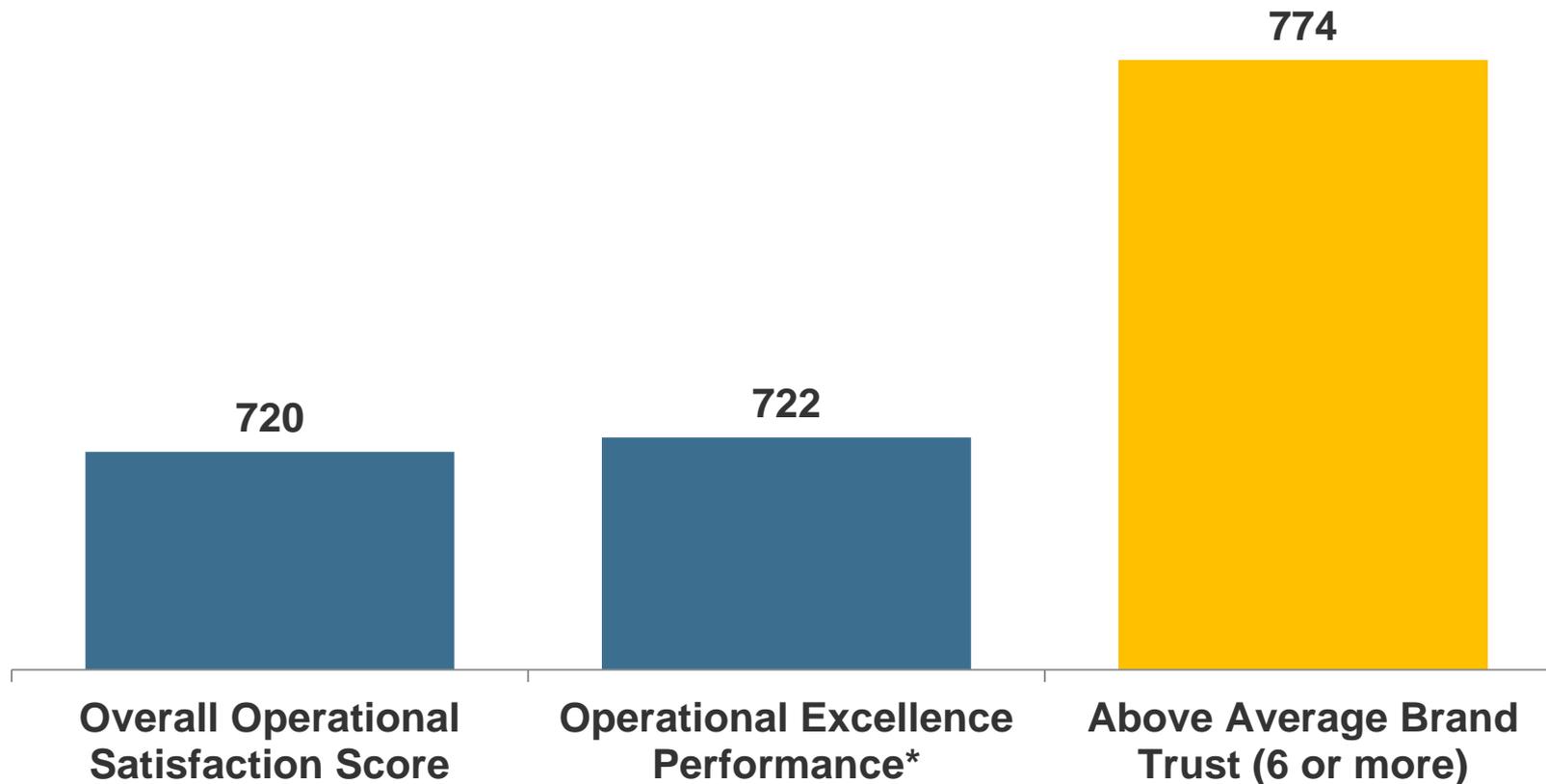
Industry Customer Engagement (ECR) Index



BMB-E-9

- Improving Operations will not move the needle on Satisfaction
- Becoming “Trusted” Yields 54 points of higher Satisfaction

SDG&E Operational Satisfaction Index



**Operational Excellence Performance = no outage, never heard of outage, no safety issue, not heard of rate increase*

BMB-E-10

Industry's Top Product Experience Providers

	COMBINATION		ELECTRIC		GAS	
EAST	BGE	718	PPL Electric Utilities	696	New Jersey Natural Gas	726
	Delmarva Power	702	Duquesne Light	695	Washington Gas	705
			Penelec	685		
			Atlantic City Electric	680		
			Central Maine Power	676		
			Met Ed	667		
			Pepco	663		
			West Penn Power	658		
MIDWEST	MidAmerican Energy	725	Indianapolis Power & Light	713	CenterPoint Energy-Midwest	705
	DTE Energy	724	Indiana Michigan Power	705	Columbia Gas of Ohio	693
	Consumers Energy	715	Dayton Power & Light	703	Black Hills Energy	691
	Alliant Energy	707	OPPD	702	Atmos Energy-Midwest	686
	Xcel Energy - Midwest	701	AEP Ohio	684	Missouri Gas Energy	684
			Ohio Edison	678		
		The Illuminating Company	676			
SOUTH	Louisville Gas & Electric	730	FPL (Florida Power & Light)	749	PSNC Energy	738
	CPS Energy	729	Gulf Power	743	Piedmont Natural Gas	728
			Kentucky Utilities	736	TECO Peoples Gas	726
			Georgia Power	730	Columbia Gas - South	726
			OG&E	730	Virginia Natural Gas	725
			TECO Tampa Electric	719	CenterPoint Energy-South	723
			PSO	719	Alagasco	719
			Alabama Power	713		
WEST	SDG&E	699	Salt River Project	748	SoCalGas	726
	PG&E	694	SMUD	732	NW Natural	718
	Avista	691	Portland General Electric	720		
	Puget Sound Energy	689	Idaho Power	719		
			Pacific Power	707		

BMB-E-11

Utility Product Experience and Brand Lag on Performance

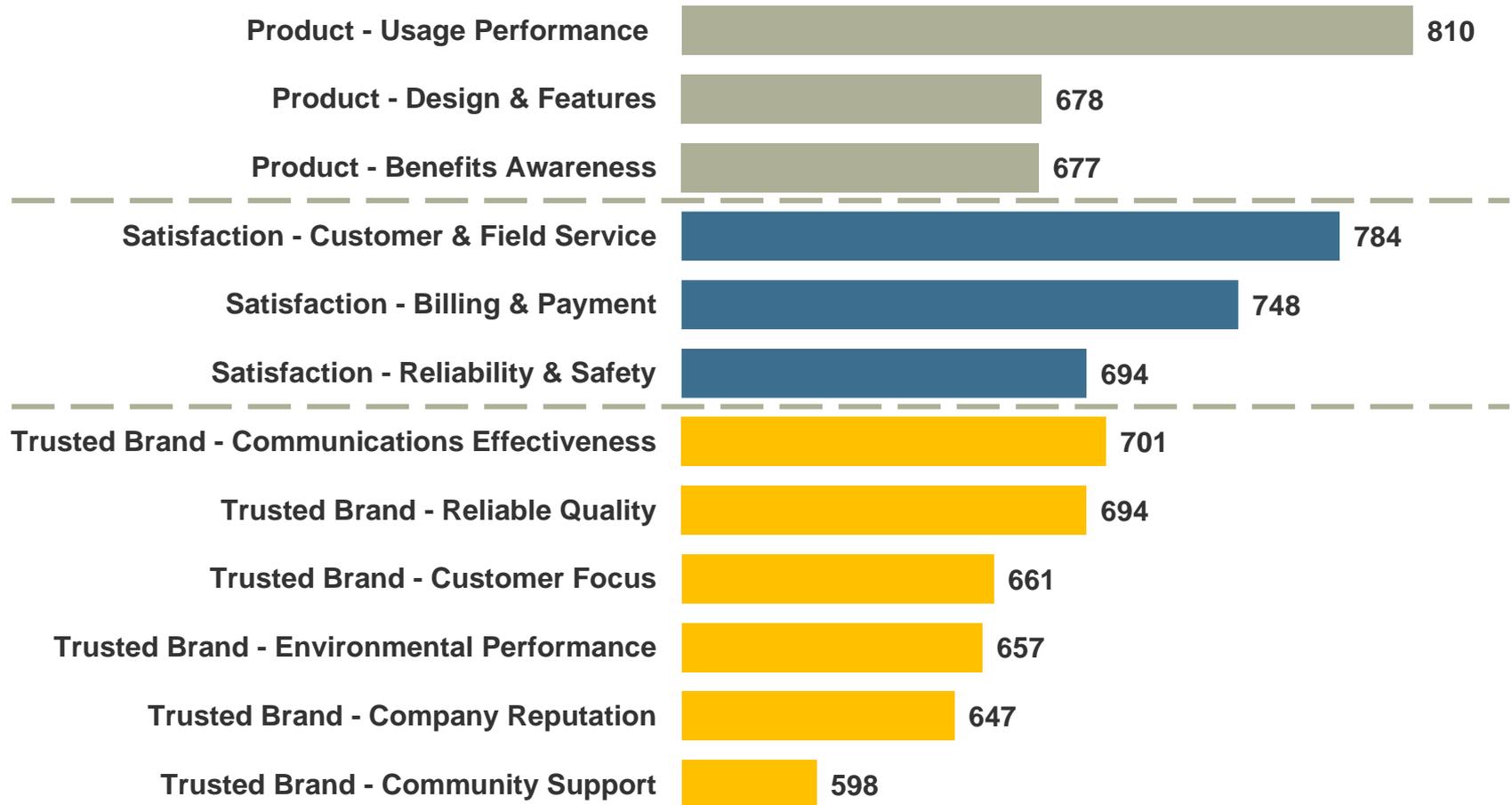
- Satisfaction is close to maximized



Index: 1,000-point max scale

BMB-E-12

Industry needs to have a focus on educating on product design and benefits



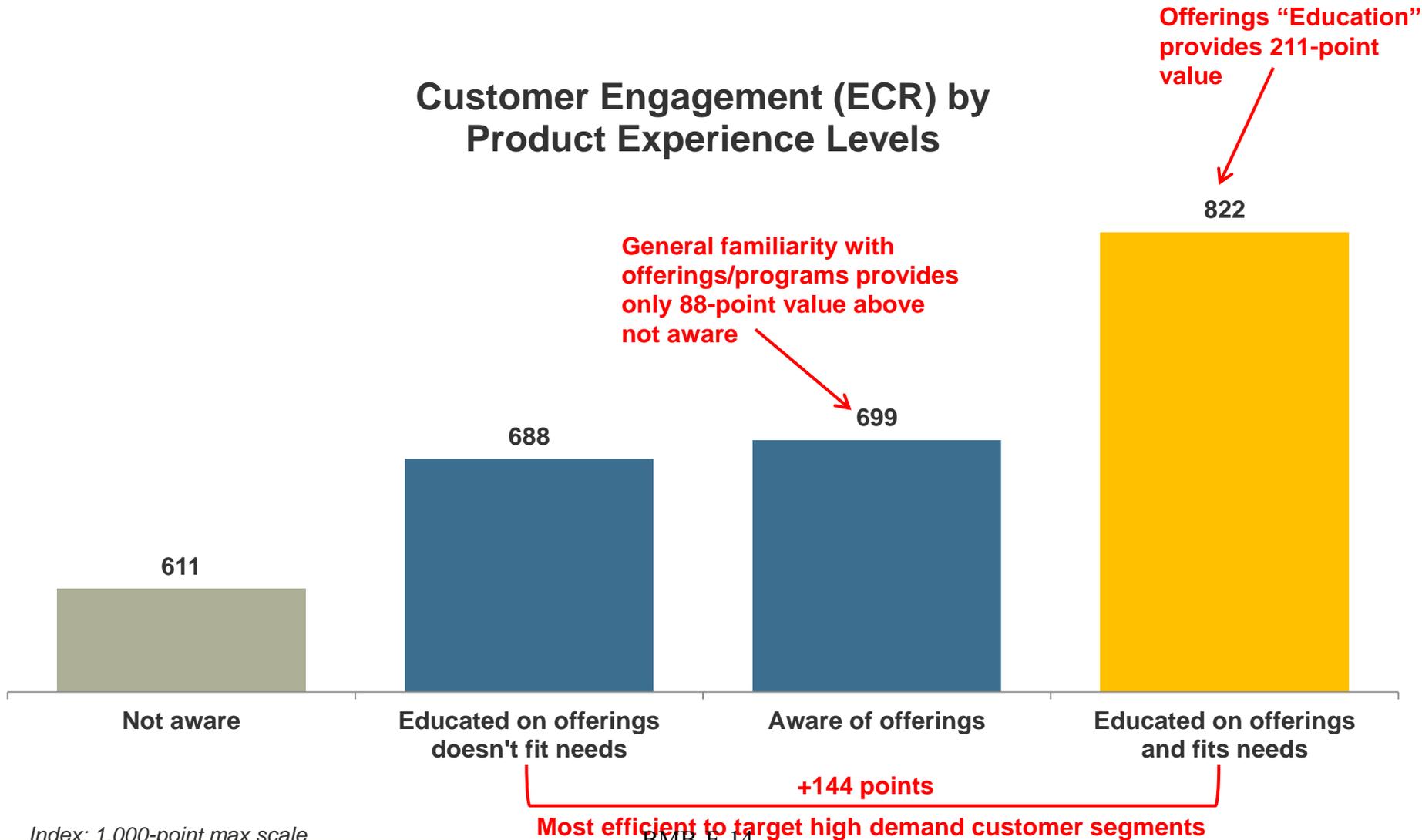
Index: 1,000-point max scale

BMB-E-13

Greatest Customer Engagement advantage is garnered from product education and targeting customers

- Forget old school “Familiarity” and “Educate” on features and benefits

Customer Engagement (ECR) by Product Experience Levels

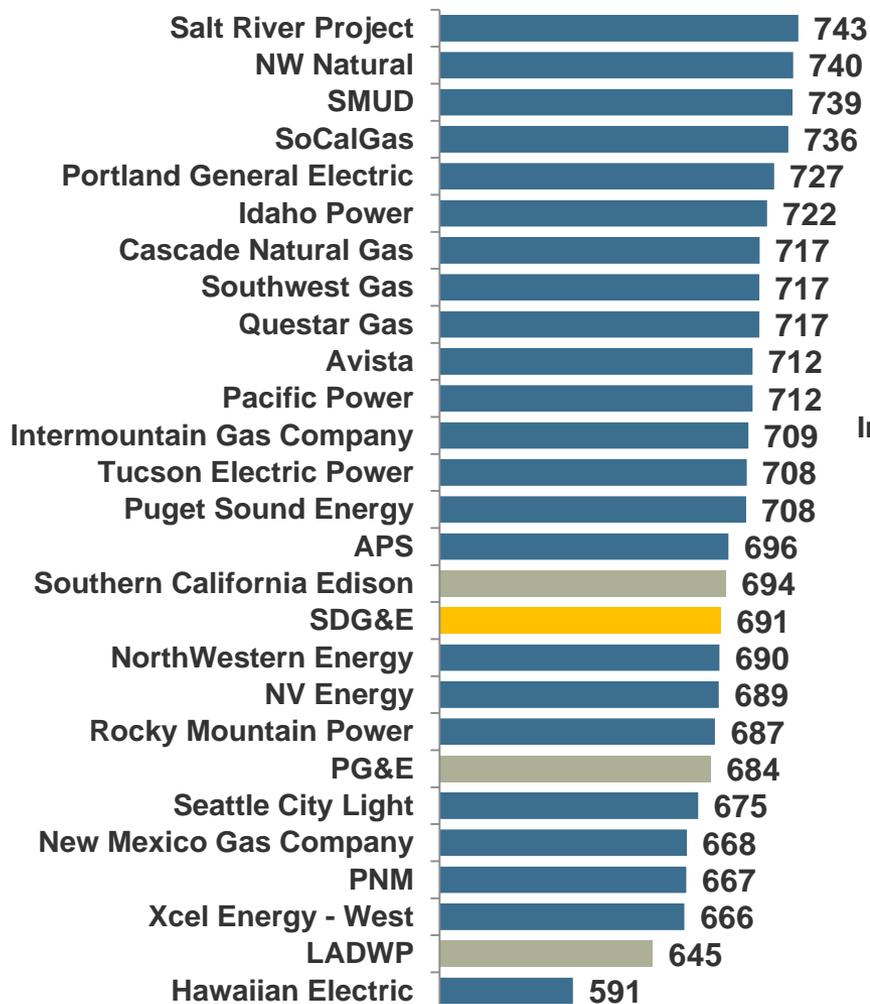


Index: 1,000-point max scale

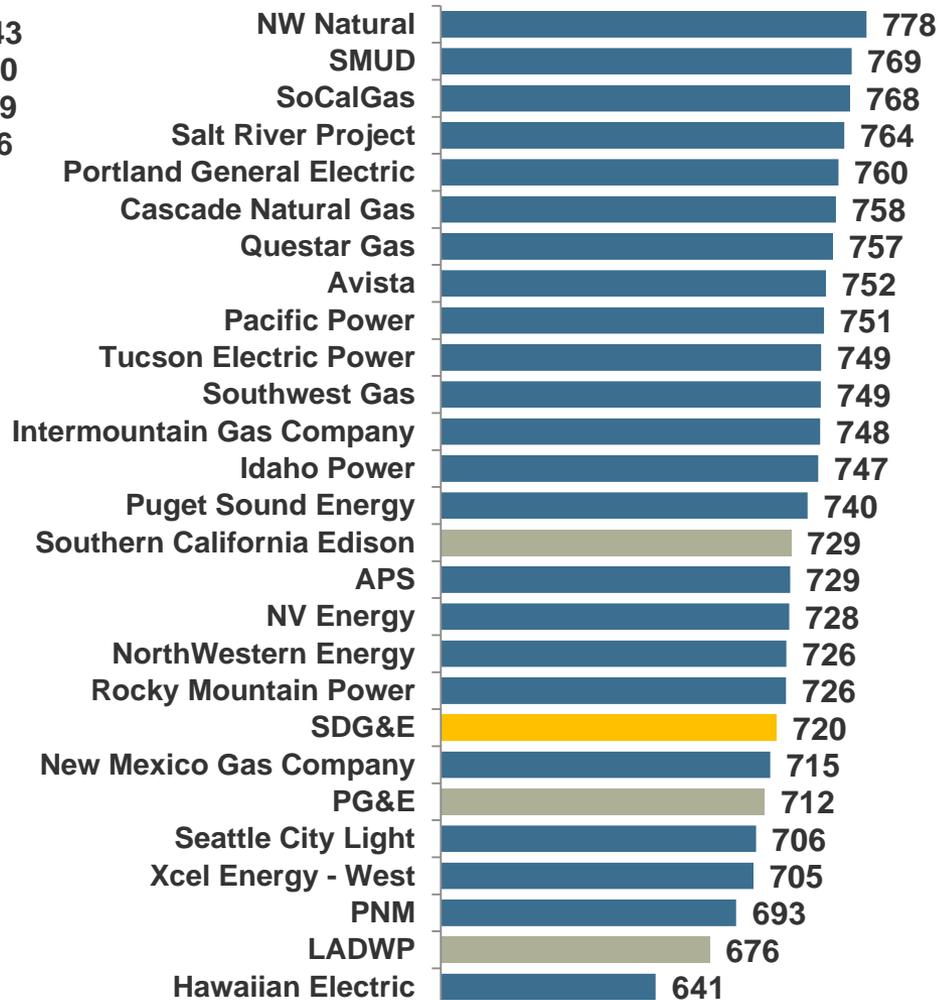
West Region Customer Engagement Performance

Electric and Gas Utility Benchmarking

Engaged Customer Relationship Index



Operational Satisfaction Index



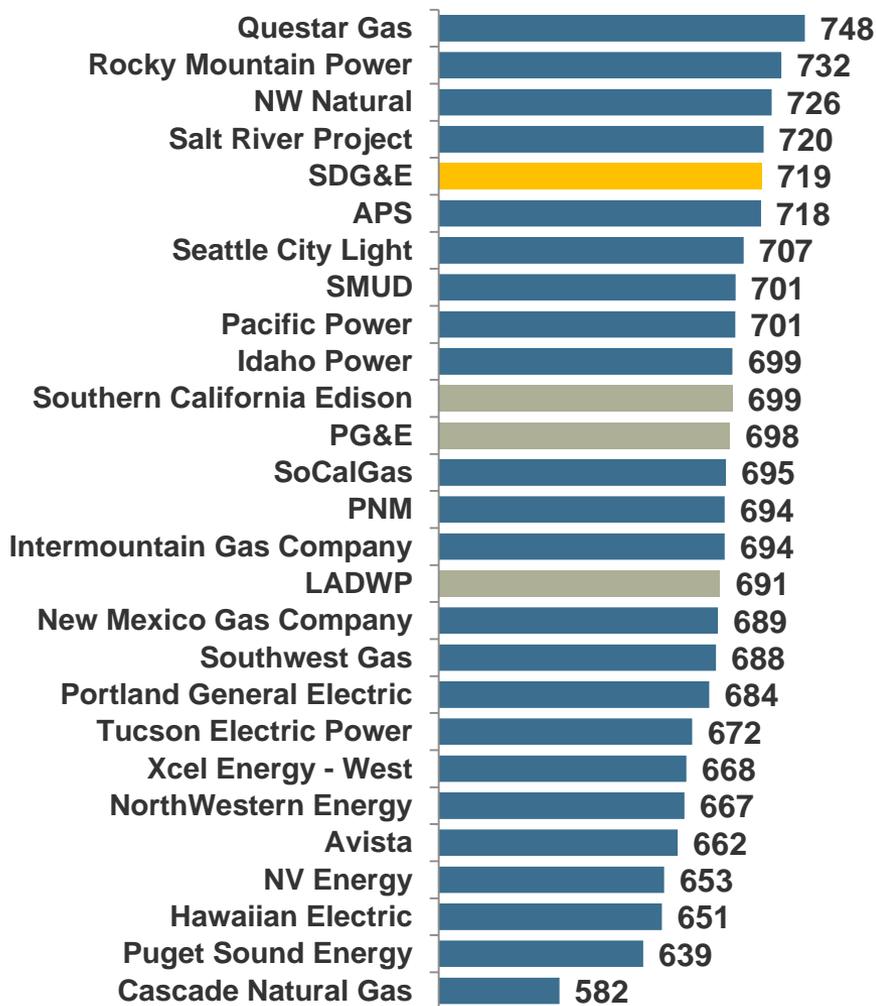
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BMB-E-15

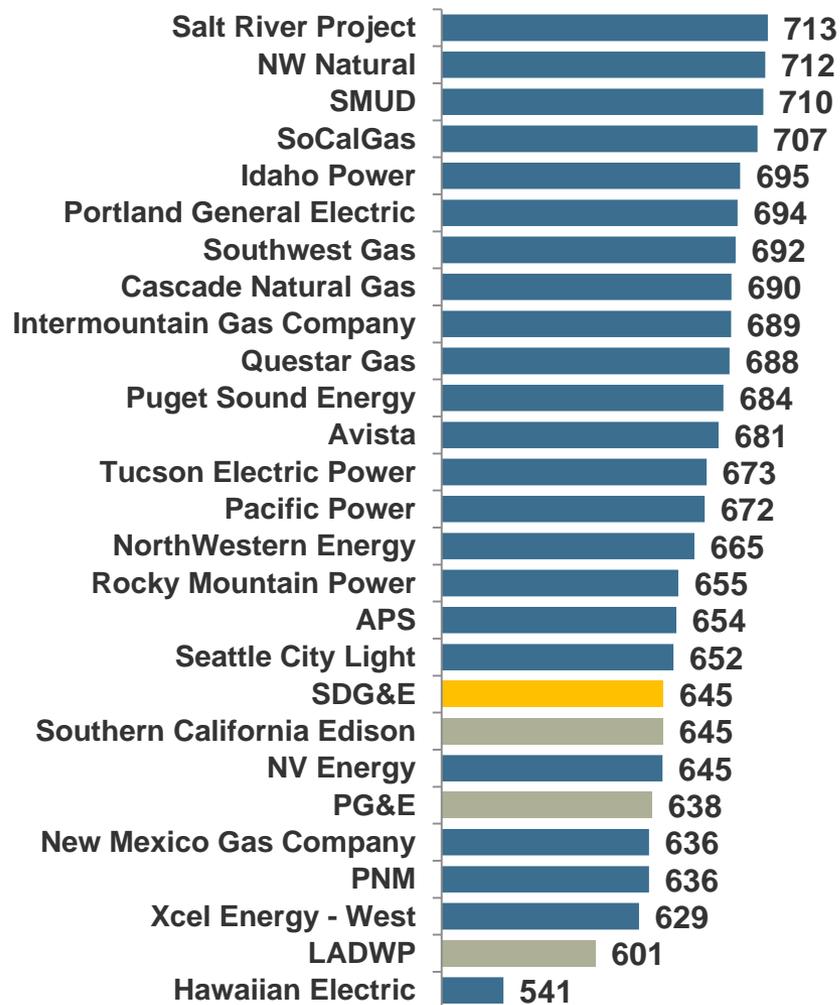
West Region Customer Engagement Performance

Electric and Gas Utility Benchmarking

Product Experience Index



Trusted Brand Index

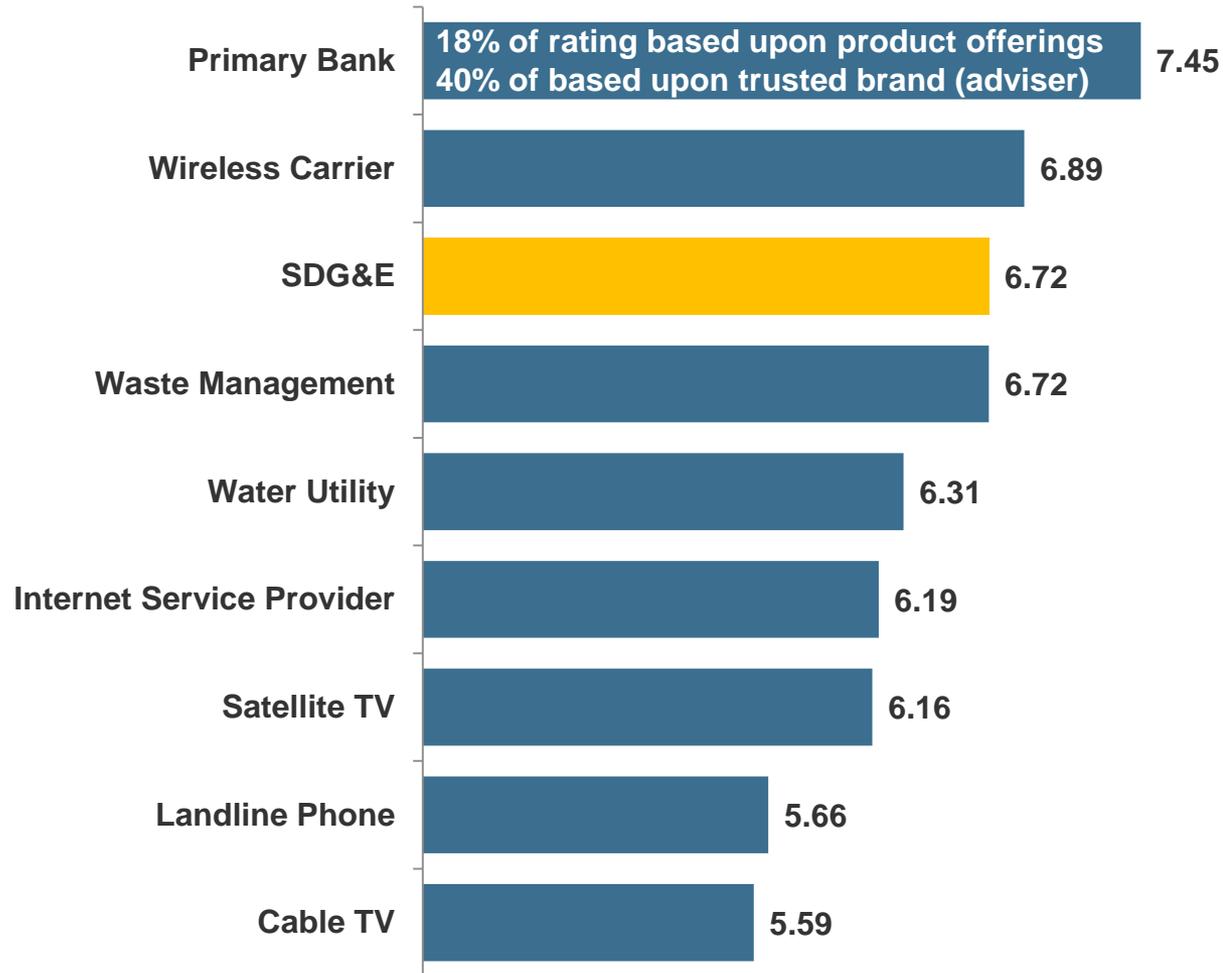


Index: 1,000-point max scale

BMB-E-16

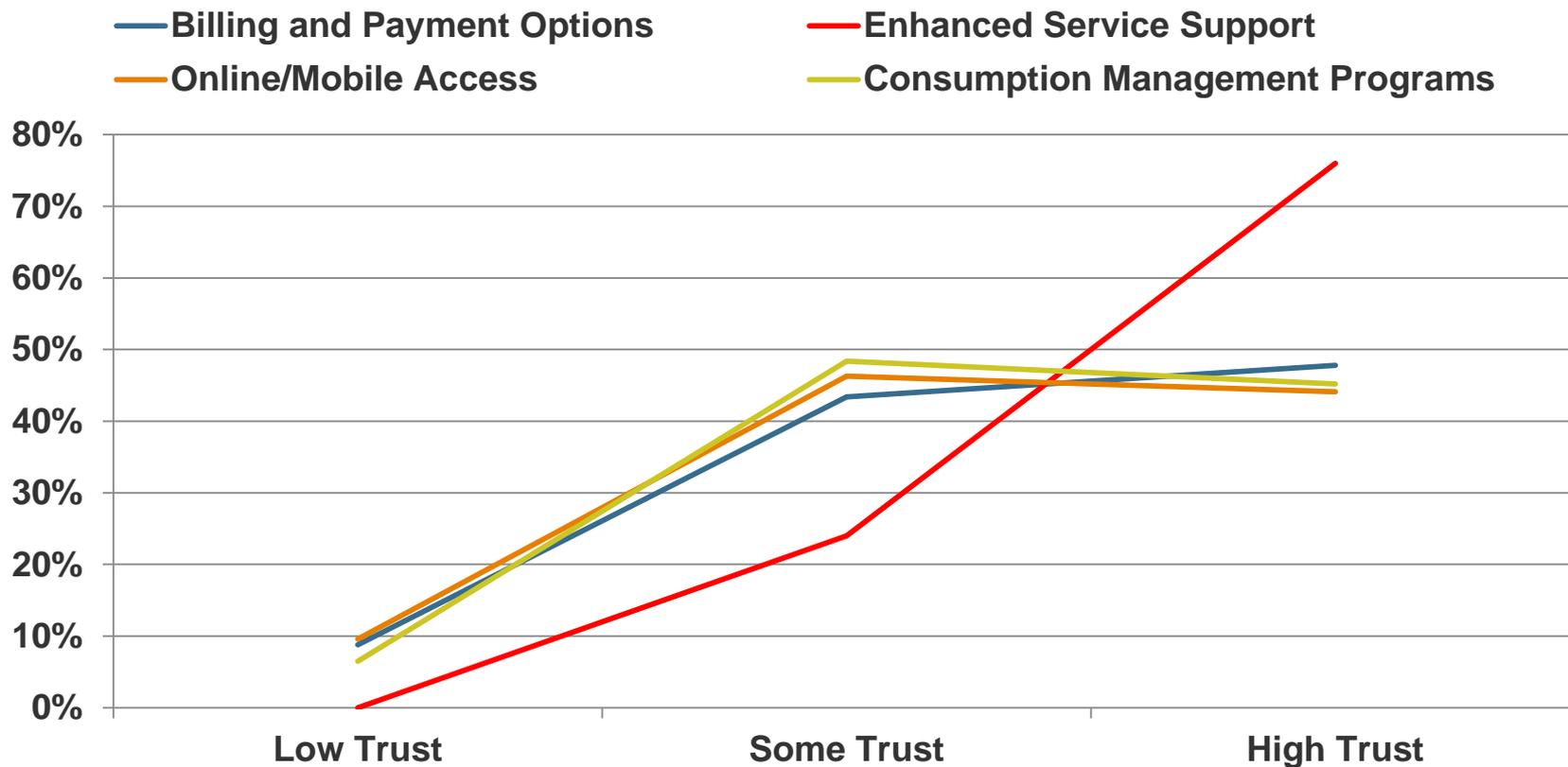
Banks and Wireless Carriers benchmarking could help target improvements

Customer Engagement Rating (ECR)



Scale: 0-10 on engaged customers relationship rating question BMB-E-17

Becoming a Trusted Adviser is essential to customers utilizing SDG&E programs

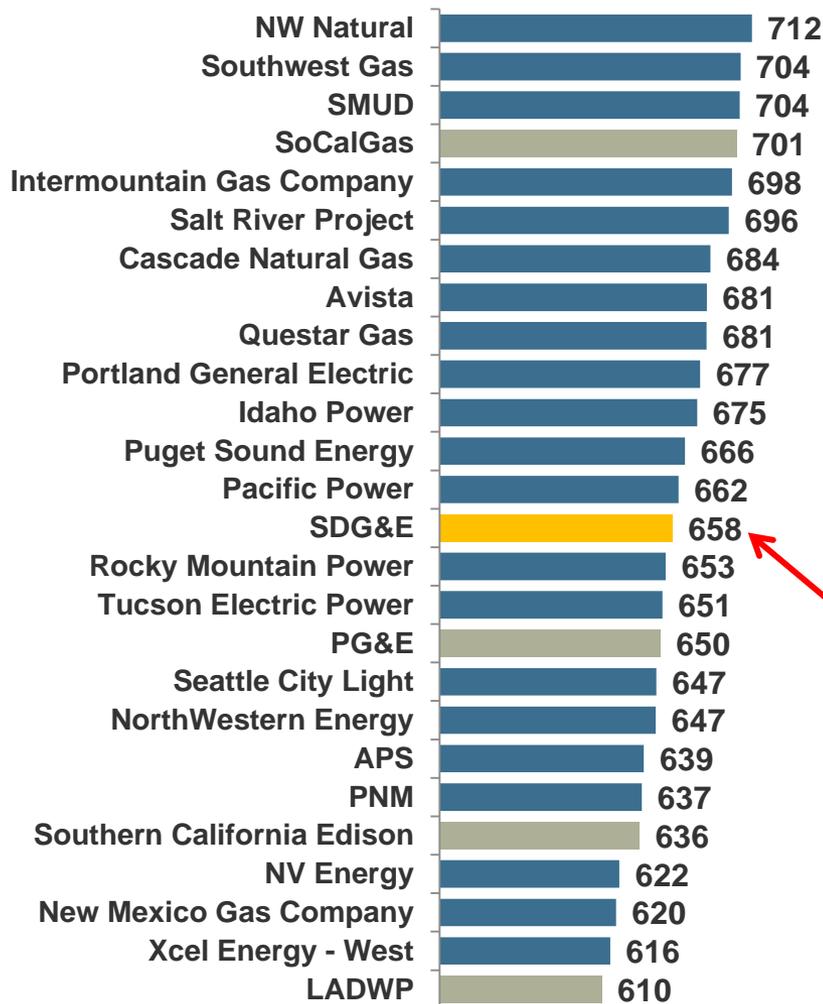


BMB-E-18

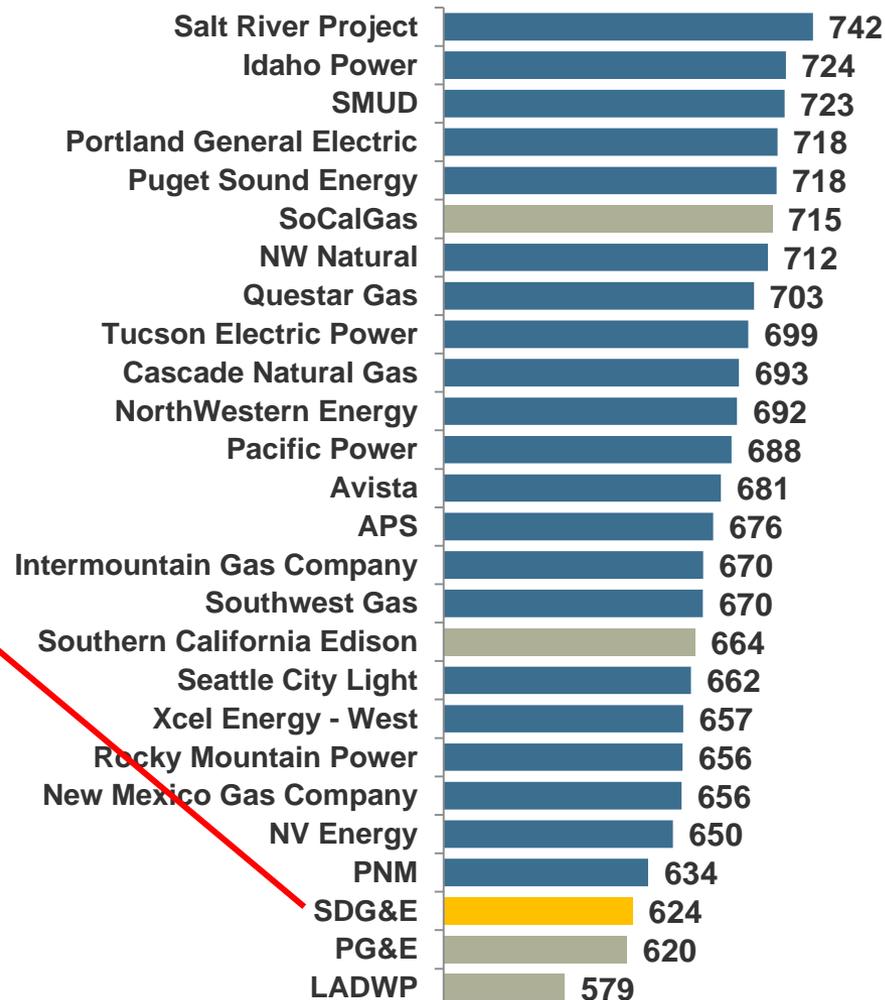
West Region utilities should prepare for the Age Wave

- A new “best-in-class” trusted adviser is positioned to emerge

Most Trusted Brands (Age <55)



Most Trusted Brands (Age 55+)



Index: 1,000-point max scale

BMB-E-19

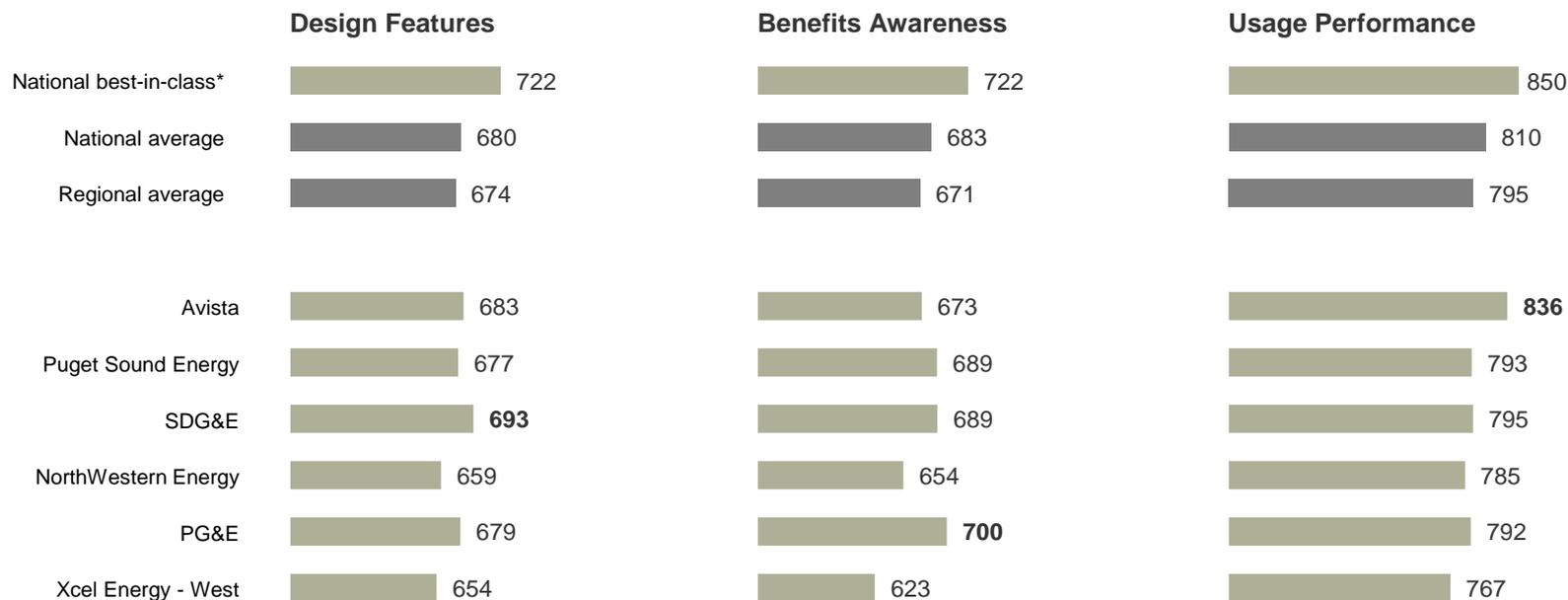
Product Experience Performance



BMB-E-20

West Combination Operational Satisfaction Performances

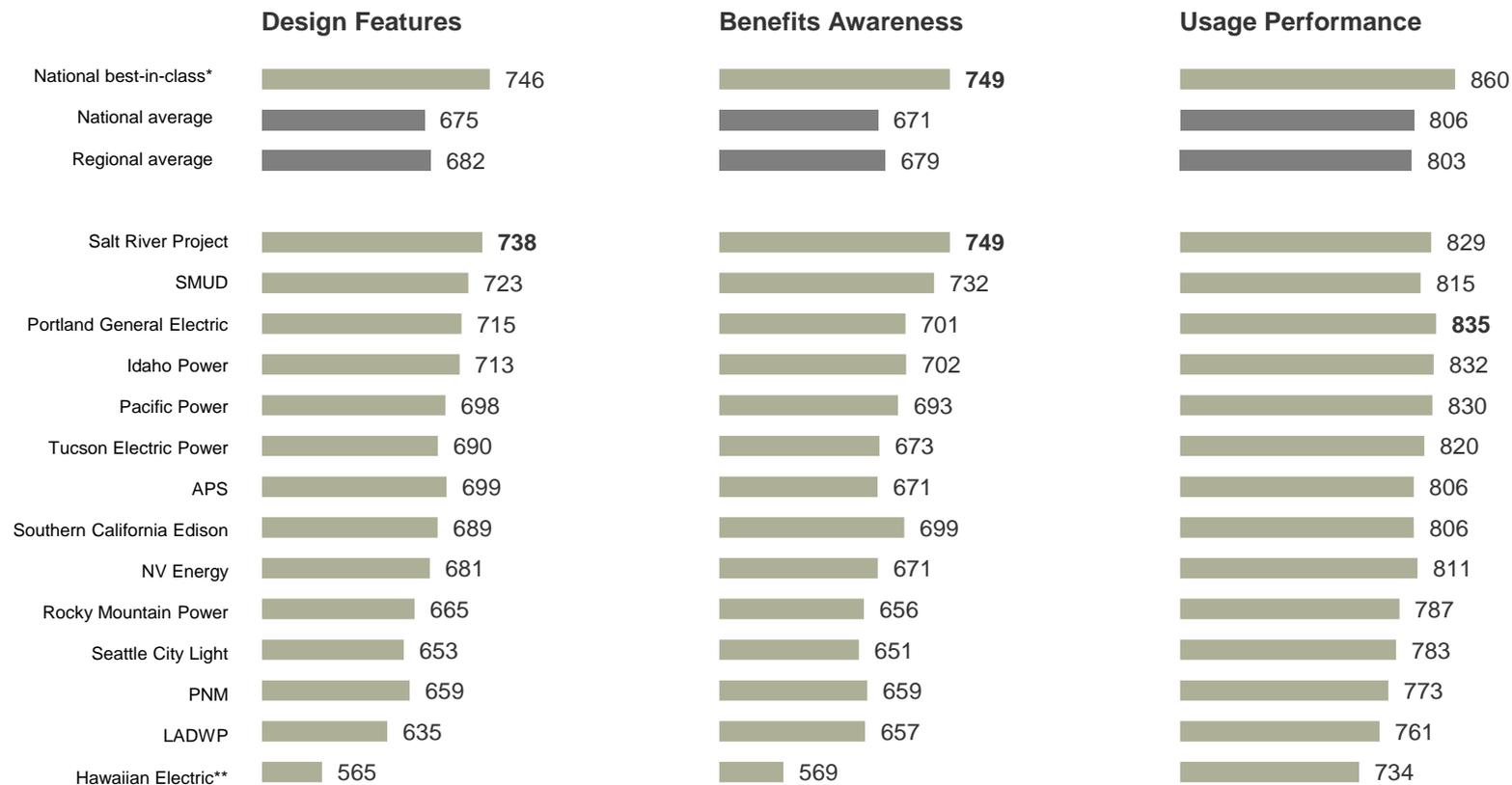
> WEST: COMBO: YTD PRODUCT EXPERIENCE STRATEGIC FACTOR PERFORMANCE SCORES



BMB-E-21

SRP brands products, SMUD proliferates products, PGE focuses on billing cycle, Idaho is emerging

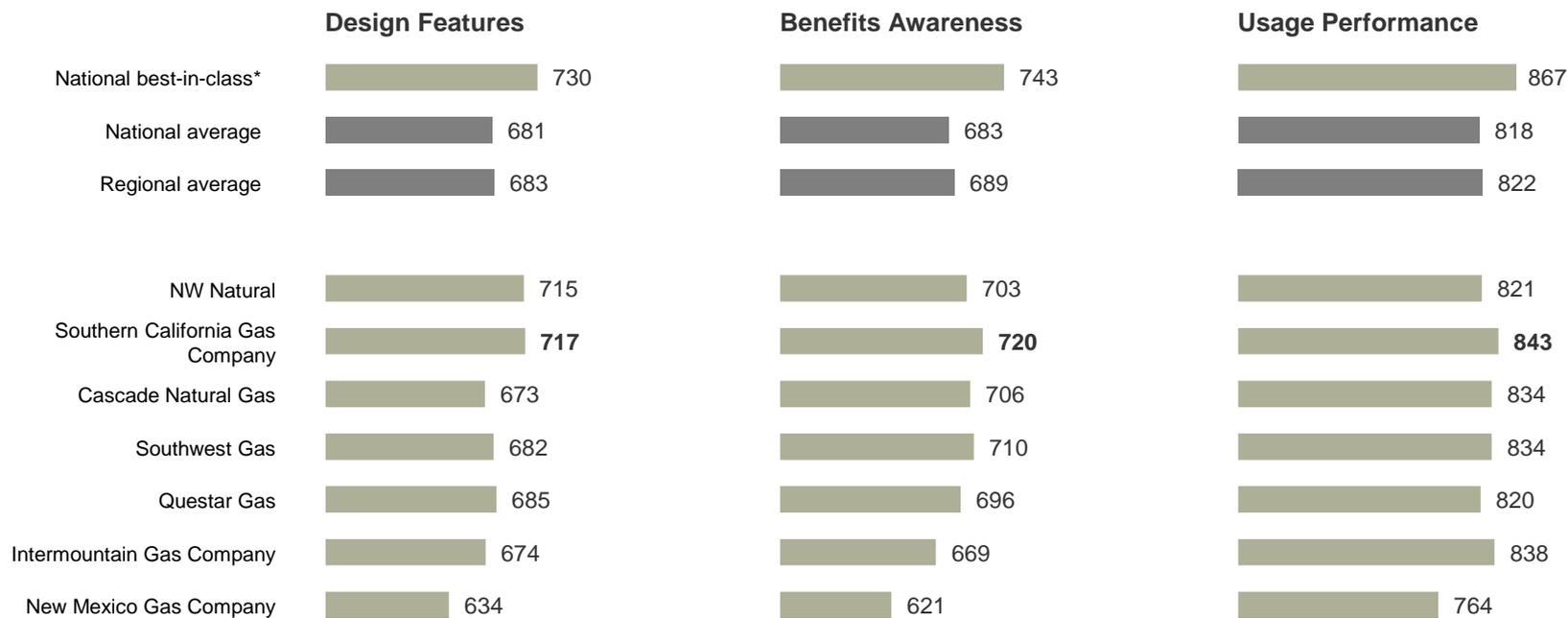
> WEST: ELECTRIC: 2014 PRODUCT EXPERIENCE STRATEGIC FACTOR PERFORMANCE SCORES



BMB-E-22

West Gas Product Experience Performances

> WEST: NATURAL GAS: YTD PRODUCT EXPERIENCE STRATEGIC FACTOR PERFORMANCE SCORES



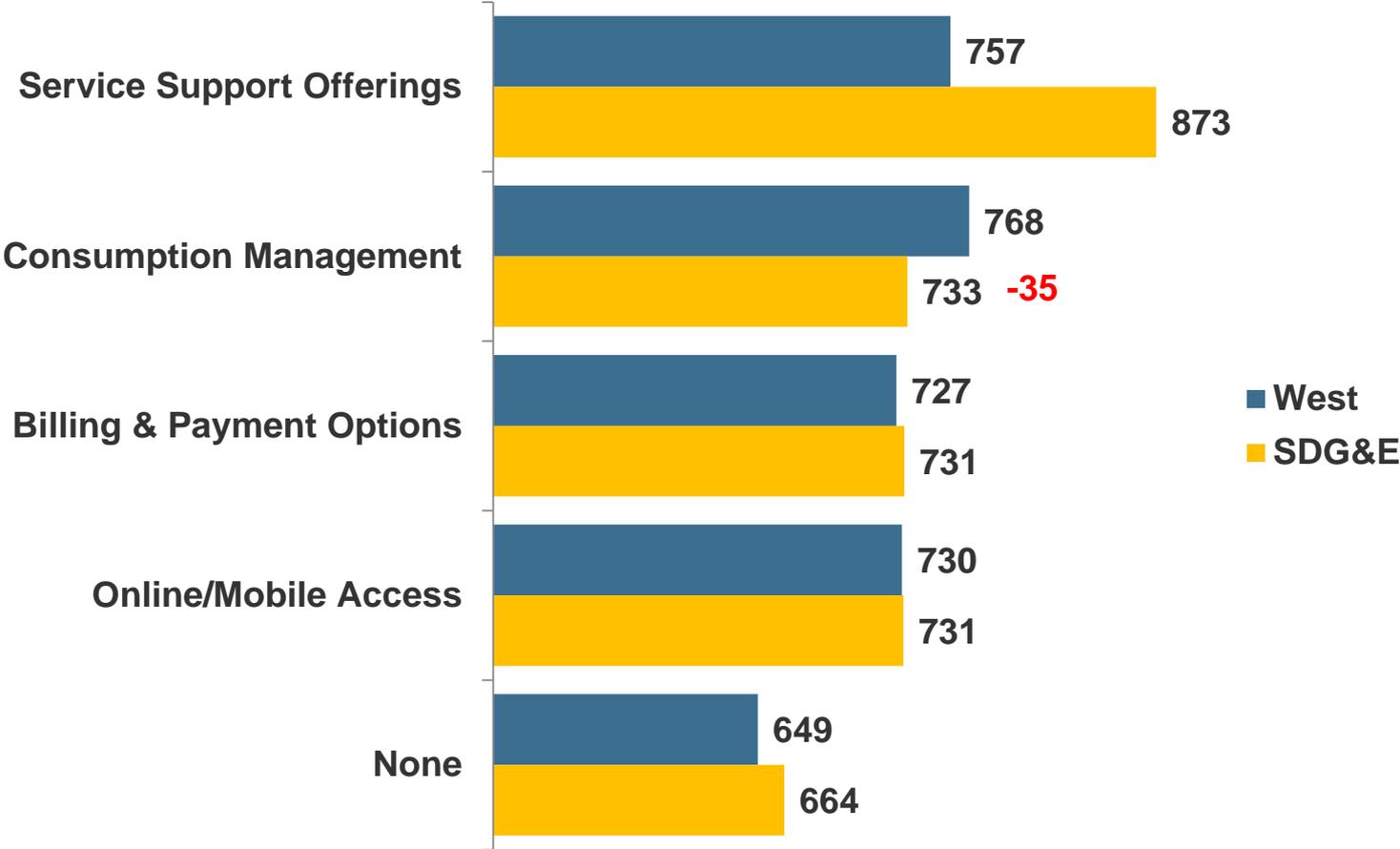
BMB-E-23

SDG&E Dominant Shopping Behaviors by Age

	Under 35	35-44	45-54	55-64	65 or older
I am usually one of the first to adopt a new product	9%	11%	12%	--	--
Owning the latest product design or technology is important	5%	8%	2%	2%	--
I consider the environmental impact of my purchases	19%	15%	12%	19%	24%
Getting a good deal on a product I purchase is important	56%	47%	44%	75%	42%
Products offered by well-known brands are most desirable	5%	19%	6%	11%	10%
High quality is more important than low price	30%	23%	33%	30%	28%
3rd party endorsements/recommendations are important in my purchase decisions	4%	8%	6%	13%	8%
It is important to consider the convenience of a product before purchasing	14%	11%	14%	32%	36%
Prefer to use vendors that have great customer service	23%	30%	33%	47%	38%
Prefer to shop online or mobile versus visiting a store	30%	17%	15%	17%	28%
Prefer to use vendors who give back to the community	9%	11%	17%	4%	8%

BMB-E-24

Product Experience Scores by Enhanced Product Usage



BMB-E-25

Product Experience Ratings Performance Benchmarking

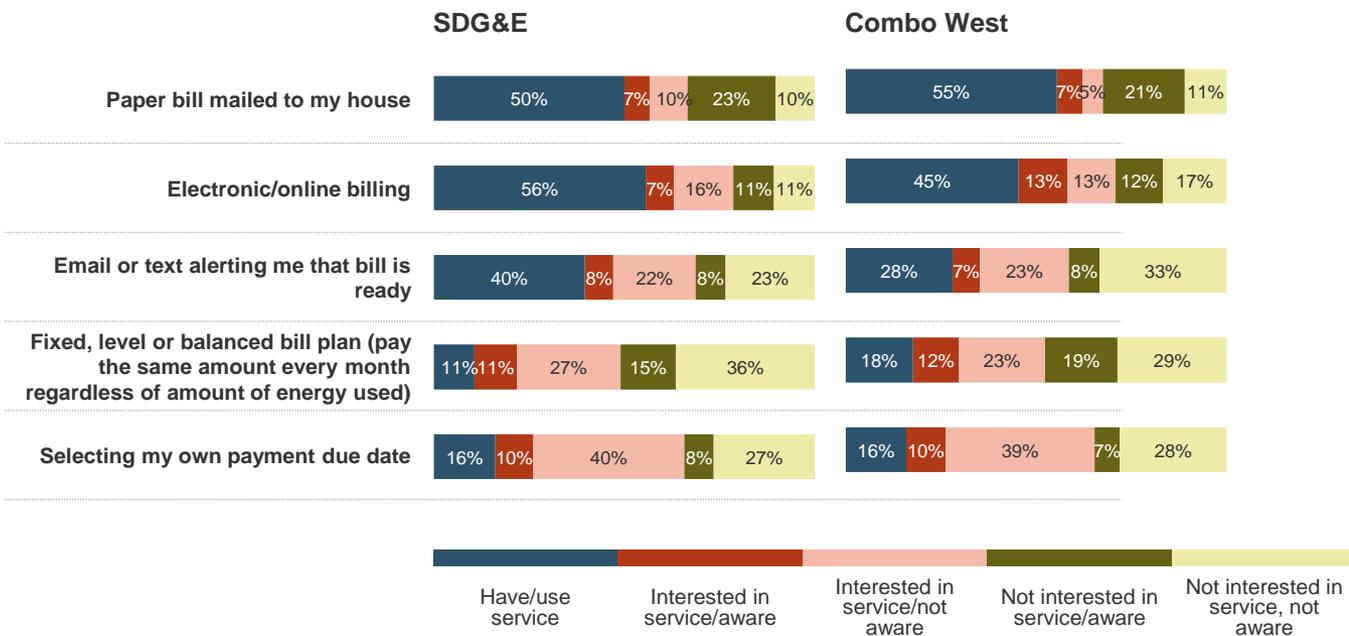
<u>Attribute Ratings</u>		<u>SDG&E</u>	<u>West Electric</u>	<u>Diff</u>
Design Features	Clearly explains the programs and offerings they provide	6.77	6.60	0.17
	Makes it easy to enroll in or start using their programs or offerings	7.10	6.82	0.28
	Encourages the use of online services and electronic formats for transactions and communications	7.19	6.99	0.20
	Encourages or incentivizes the use of “smart technology” that helps manage energy usage or costs	6.79	6.60	0.19
	Makes information on their programs or offerings easily accessible	6.80	6.74	0.06
	Offers me a comprehensive variety of high-quality programs, services and offerings to choose from	6.63	6.47	0.16
Usage Experience	Billing and Payment Options - Easy to Use	8.24	8.11	0.13
	Billing and Payment Options - Perform as Promised	8.26	8.10	0.16
	Enhanced Service Support - Easy to Use	8.22	7.65	0.57
	Enhanced Service Support - Perform as Promised	8.52	7.74	0.78
	Online/Mobile Account Services - Easy to Use	8.09	8.02	0.07
	Online/Mobile Account Services - Perform as Promised	8.10	8.02	0.08
	Consumption Management Services - Easy to Use	7.52	7.45	0.07
	Consumption Management Services - Perform as Promised	7.68	7.50	0.18
Benefits Awareness	Provides programs or offerings that improve their customer service	6.80	6.81	-0.01
	Provides programs or offerings that make it easier to do business with them	6.96	7.03	-0.07
	Their programs or offerings can or did help me lower my overall utility costs	6.78	6.36	0.42
	Provides programs or offerings that help the environment	6.78	6.68	0.10
	Their programs or offerings can or did help make me a more conscious energy consumer	6.86	6.70	0.16
	Provides programs or offerings that can or did help fit my needs	6.95	6.88	0.07
	In addition to their service, offers programs, tools and/or services that are valuable to me overall.	6.80	6.46	0.34

BMB-E-26

SDG&E Billing Presentment

- Selecting Due Date Has Demand
- Many Fixed Bill and Bill Alert Customers Are Not Aware of Offering

> BILLING FORMAT AND PRESENTMENT: USAGE AND INTEREST

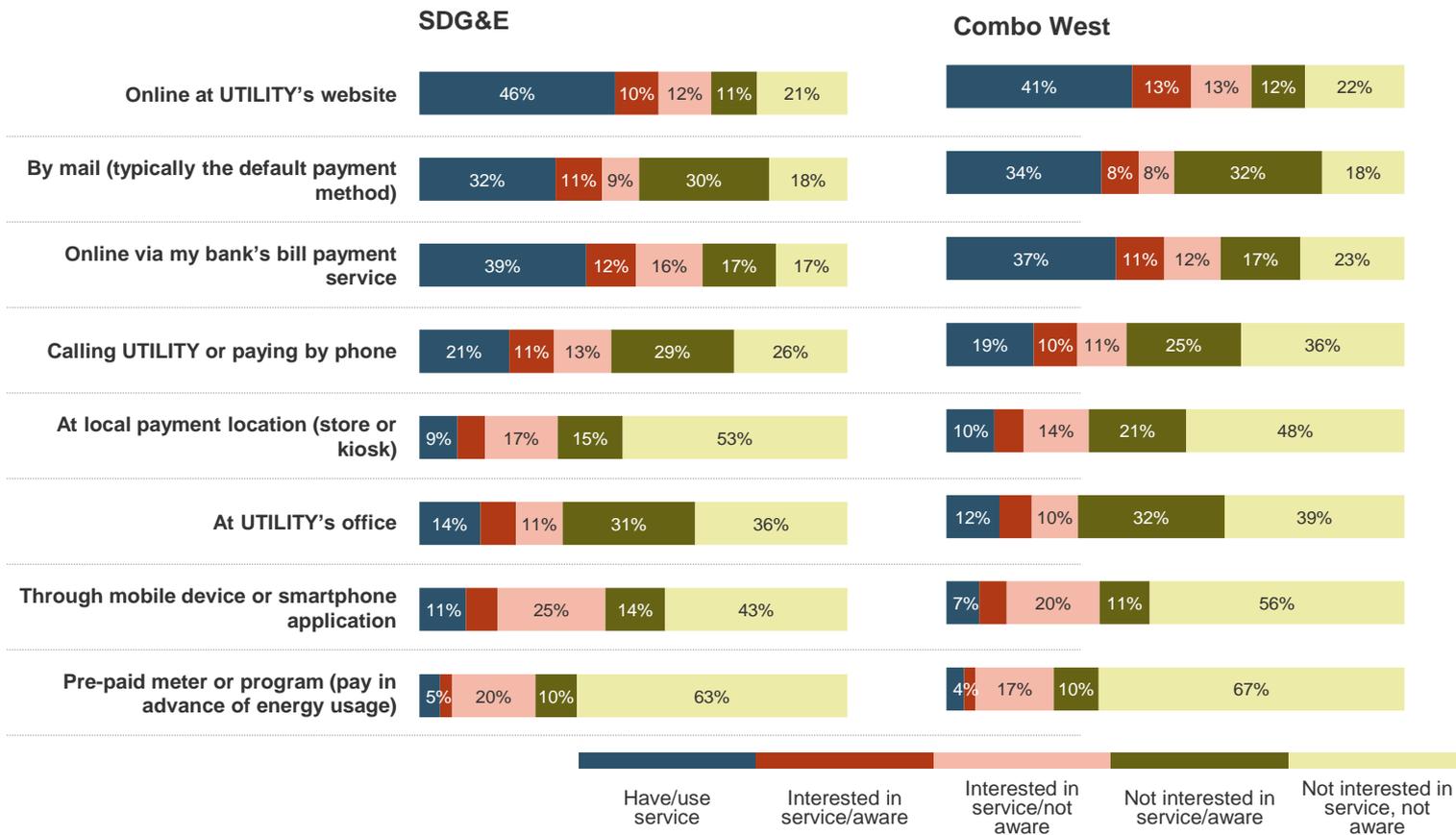


BMB-E-27

SDG&E Payment Channels

- Demand exists but most of those interested are not aware

> PAYMENT CHANNELS: USAGE AND INTEREST

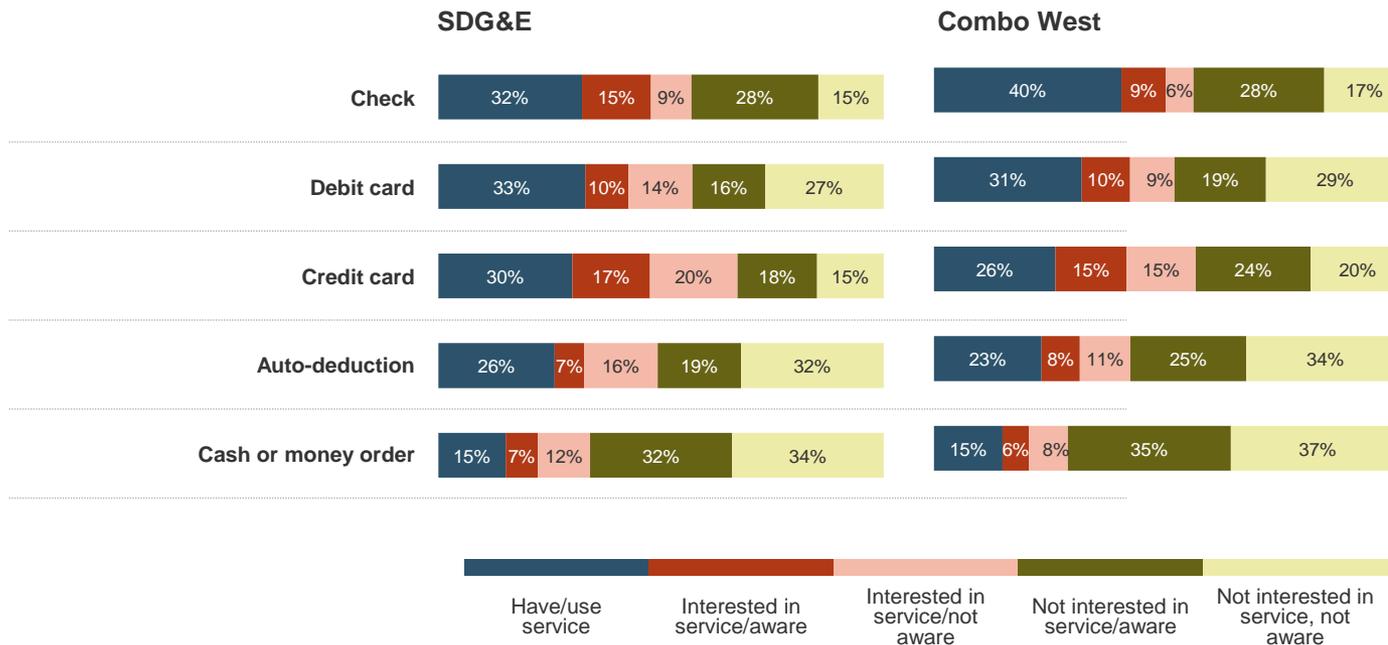


BMB-E-28

SDG&E Payment Methods

- Customers are paying in the way they would like for the most part
- Some credit card payment demand

> PAYMENT METHODS: USAGE AND INTEREST

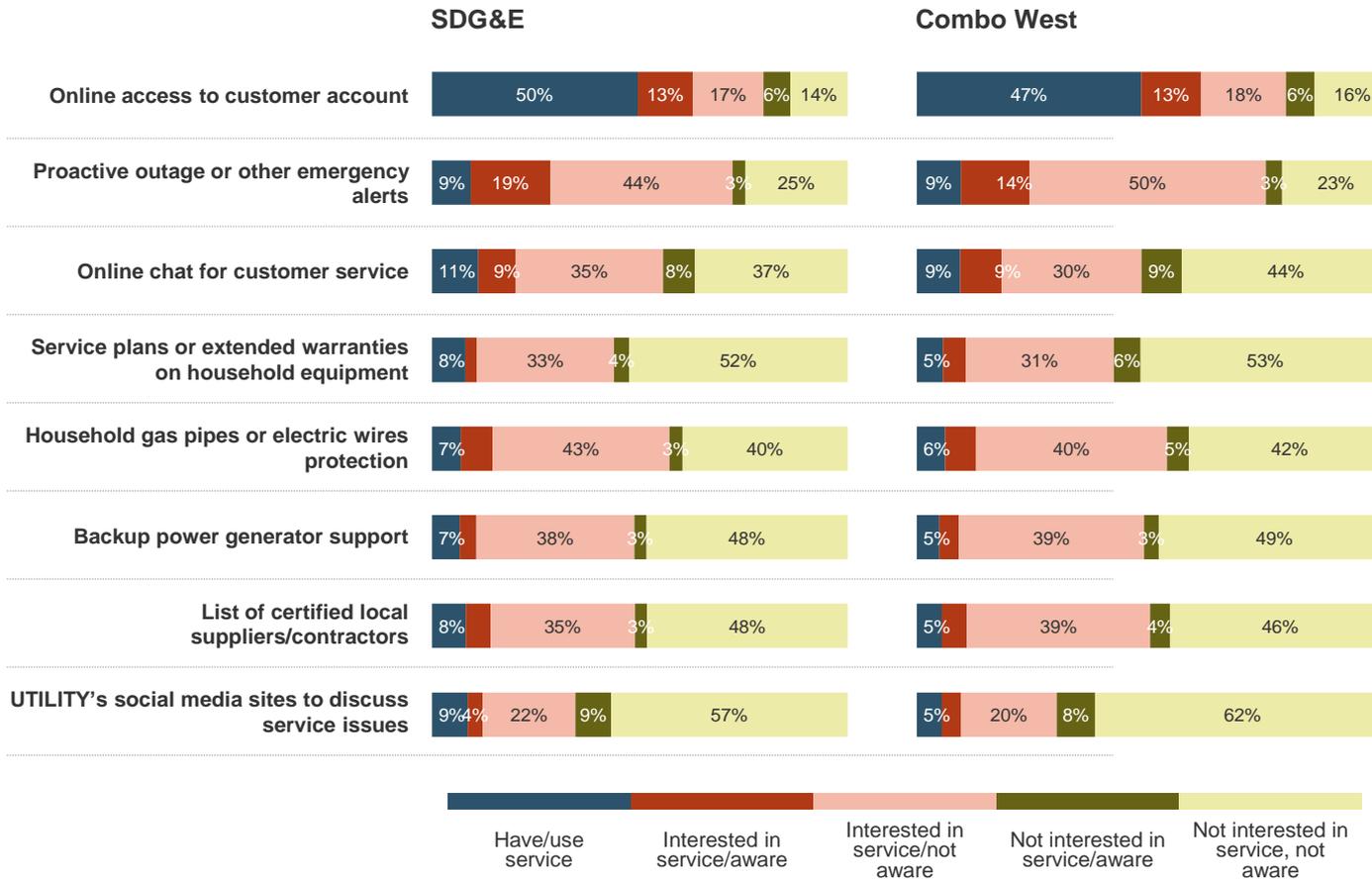


BMB-E-29

SDG&E Enhanced Service Support Options

- Few with demand are aware of offerings
- Online chat is gaining interest

> ENHANCED SERVICE SUPPORT OFFERINGS: USAGE AND INTEREST

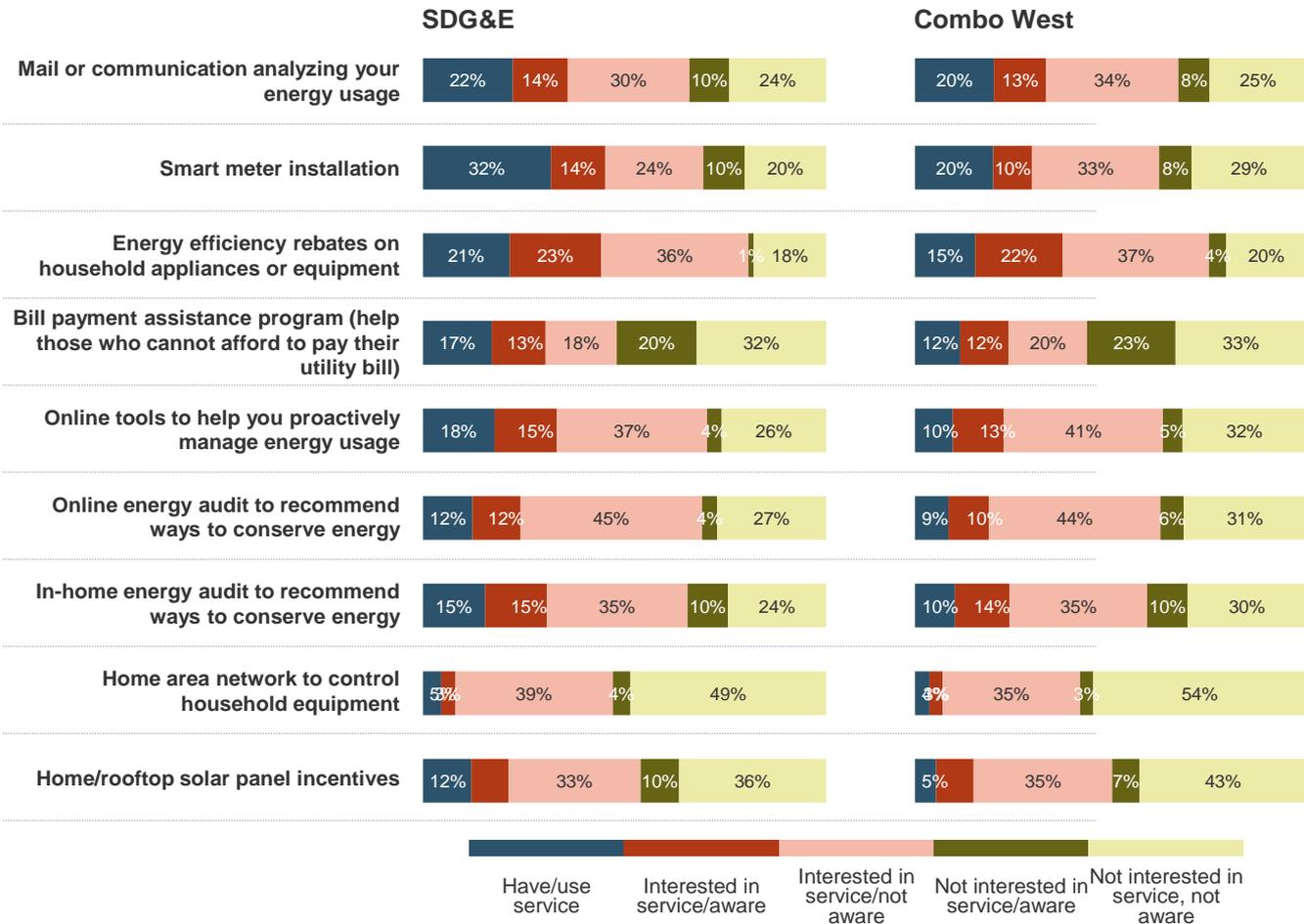


BMB-E-30

SDG&E Consumption Management

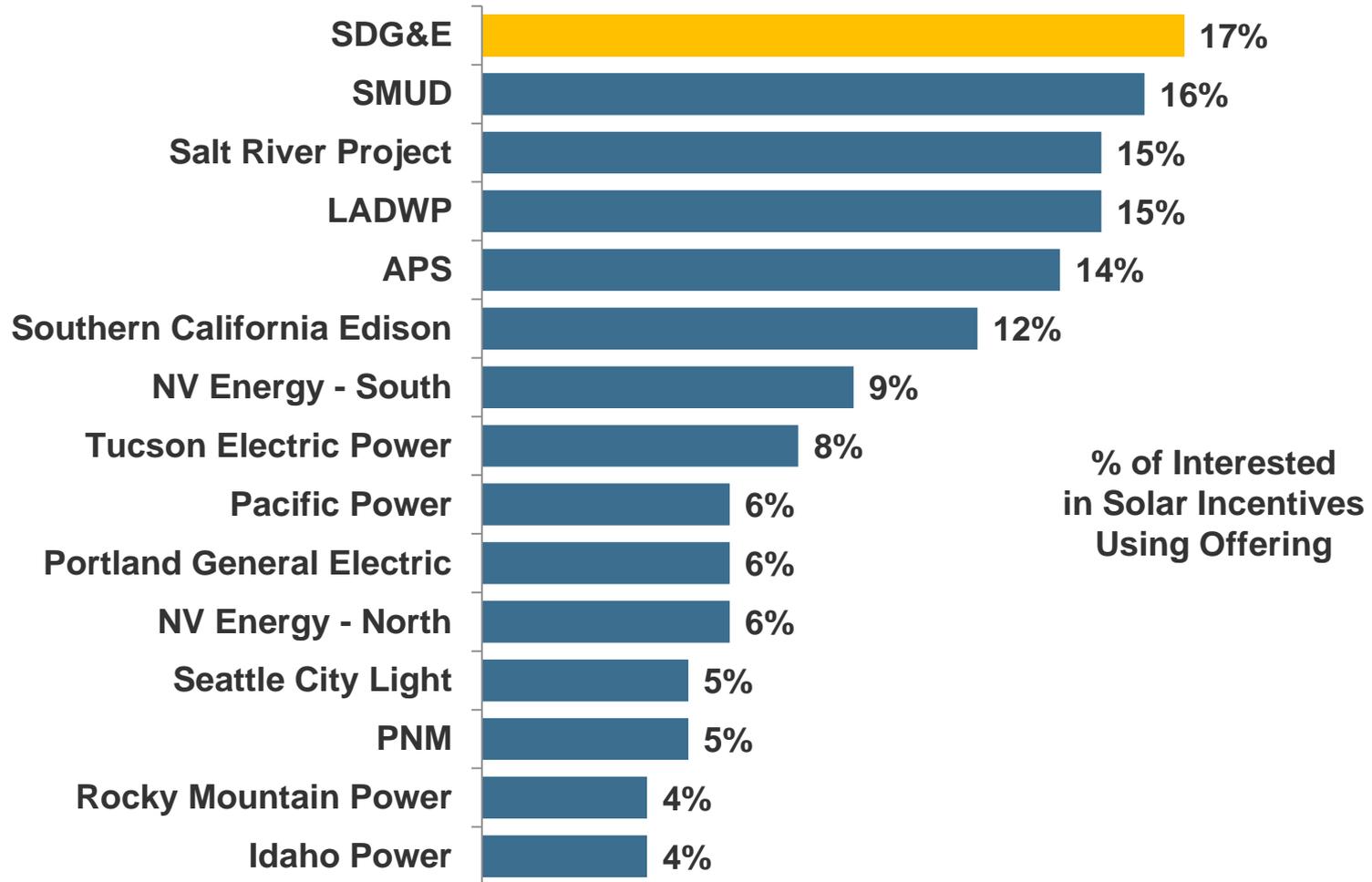
- Customers are seeking advice in lowering consumption
- Benefit from position as a trusted advisor

> CONSUMPTION MANAGEMENT OFFERINGS: USAGE AND INTEREST



BMB-E-31

SDG&E has performed well among West peers at capturing demand for incenting residential solar usage



BMB-E-32

Customer Journey Implication

- Onboarding of Customers Should Leverage Product Usage Opportunity

SDG&E Customer Tenure	# of 3rd Party Sources	# Positive Comments Made	# Negative Comments Made	# Communication Channels	# Of Products or Services Used	# Of Service Types
Less than 6 months	0.5	5.4	3.0	1.7	2.6	1.1
6 to just under 12 months	0.7	4.3	3.1	1.8	2.8	0.8
12 to just under 18 months	0.9	5.3	2.1	1.4	3.3	1.0
18 months to under 2 years	0.6	2.3	2.0	1.1	2.7	0.7
2 to just under 3 years	1.1	3.7	4.6	2.1	4.0	1.2
3 to just under 5 years	0.8	2.5	3.6	1.3	4.0	0.9
5 to just under 10 years	0.8	4.7	6.4	1.9	3.5	0.8
10 years or longer	0.7	4.6	5.2	1.6	2.9	0.7
Overall	0.8	4.2	4.4	1.6	3.2	0.8

Electronic and New Product platforms will be required

- Customer Engagement lags so offerings adoption is uncertain

Next decade
we are going to
lose top scorers

<u>West Region Generations</u> <i>Dominant Theme</i>	<u>Millennials</u> <i>ESocial</i>	<u>Gen X</u> <i>X Games</i>	<u>Late Boomers</u> <i>Yuppies</i>	<u>Early Boomers</u> <i>Hippies</i>	<u>Retired</u> <i>65+</i>
---	--------------------------------------	--------------------------------	---------------------------------------	--	------------------------------

Electronic Offerings Market Usage and Potential

Electronic Bill Format	84%	82%	75%	65%	56%
Online Access To Account	83%	84%	81%	77%	72%
Online Payment At Utility Website	82%	79%	70%	59%	47%
Proactive Outage Alert	75%	78%	74%	73%	71%
Online Energy Mgt. Tools	72%	72%	66%	59%	50%
Online Energy Audit	69%	68%	61%	58%	51%
Email Or Text Bill Alert	68%	65%	58%	54%	52%
Online Via Bank Payment	66%	64%	59%	56%	57%

↑
Prefer using the source
↓

Emerging Product Offerings

Online Chat Customer Service	65%	56%	48%	43%	31%
Solar Installation Incentives	60%	61%	49%	46%	36%
Mobile App	59%	51%	31%	20%	11%
Back Up Power Generator	58%	55%	49%	44%	35%
Gas Pipe & Wire Protection Plan	57%	53%	47%	41%	37%
Control Household Equipment	52%	53%	43%	34%	27%
Service Plans & Warranty	52%	47%	39%	35%	31%
Social Media Service Site	44%	39%	28%	23%	15%

BMB-E-34

Questions ?



APPENDIX F

Bill Redesign Business Case Highlights – Bill Ready Notification Enhancement



Bill Ready Notification Enhancement Business Case

3/4/2015

IT Business Case Template Version 6_03

BMB-F-2

INTERNAL INFORMATION

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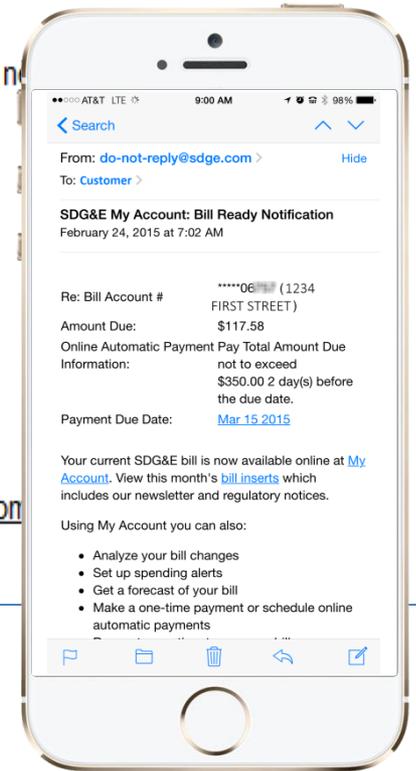
Project Name	Bill Ready Notification Enhancement				
Business VP Sponsor	Caroline Winn	Business Director Sponsor	Steve Rahon	IT Director Sponsor	Steve Mikovits
Current State	My Account customers receive a notification email on a monthly basis when their bill becomes available. The Bill Ready Notification currently includes: Amount Due, Due Date, Automatic Payment Information, link to pay bill, link to past bills, and some messaging.				
Project Description	<p>Objective:</p> <ul style="list-style-type: none"> To improve the customer experience and overall understanding by delivering key bill and energy usage information in the Bill Ready Notification monthly email <p>Scope:</p> <ul style="list-style-type: none"> Bill Ready Email: Enhance the existing Bill Ready Notification to include the following areas: <ul style="list-style-type: none"> Bill Summary: Service Address, Current Charges, Due Date, link to Make a Payment, link to past bills Cost Breakdown: The categorization of costs (Electricity Usage, Gas Usage, Delivery, PPP, Taxes and Fees) Energy Use Chart: 13 month usage chart (residential and small business customers), with cost overlay for the bill period by month Messaging: Existing billing messages and “tailored messages” available to the customer, excluding authenticated and promotional messages Videos: Embed relevant videos that can be targeted by customer rate (excluding promotional) Tracking: Provide open rate statistics for Bill Ready emails ESS View: Provide the ability for ESSs to view personalized data within emails 				
Regulatory Mandates	<ul style="list-style-type: none"> No regulatory approvals should be needed assuming that we do not make any changes to the paper bill, and consequently the online pdf Need to meet accessibility standards per the MOU with the Center for Accessible Technology 				
Business Benefits	<p><i>Customer Satisfaction Benefits:</i></p> <ul style="list-style-type: none"> Projected improvement to Customer Satisfaction score as measured by JD Power Increased customer understanding of usage and bills Supports transition to time-of-use rates, Rate Reform, Rate Design Window and the Pricing Challenge <p><i>Cost Benefits:</i></p> <ul style="list-style-type: none"> \$37,000 annual savings through reduced volume and payment arrangement calls to the Customer Contact Center Self-developed software, expected spend of \$1.194 million <p><i>Other Potential Benefits</i></p> <ul style="list-style-type: none"> Creation of the ability for ESS's to view personalized data in emails, can be leveraged for future projects Creation of a central repository for billing information, can be leveraged by other projects (CPPD, Group Bill, C3) Enabling the NBO email channel Better tracking ability for the Bill Ready Notification email 				

Re: Bill Account # *****70274 ()
 Amount Due: \$56.34
 Online Automatic Payment Pay Total Amount Due 5 day(s) before the due date.
 Information:
 Payment Due Date: Nov 30 2014

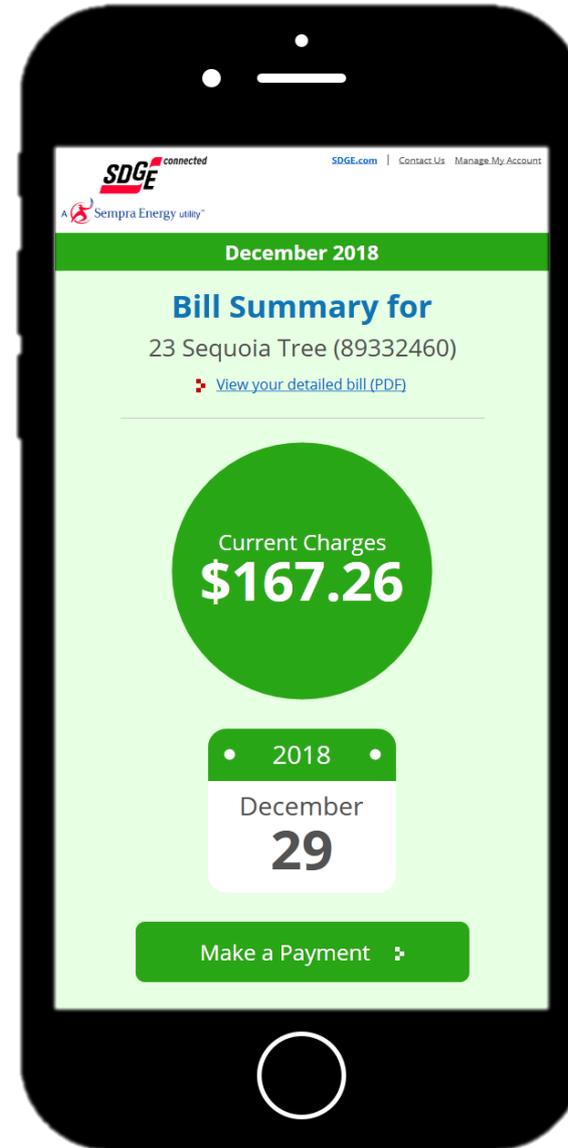
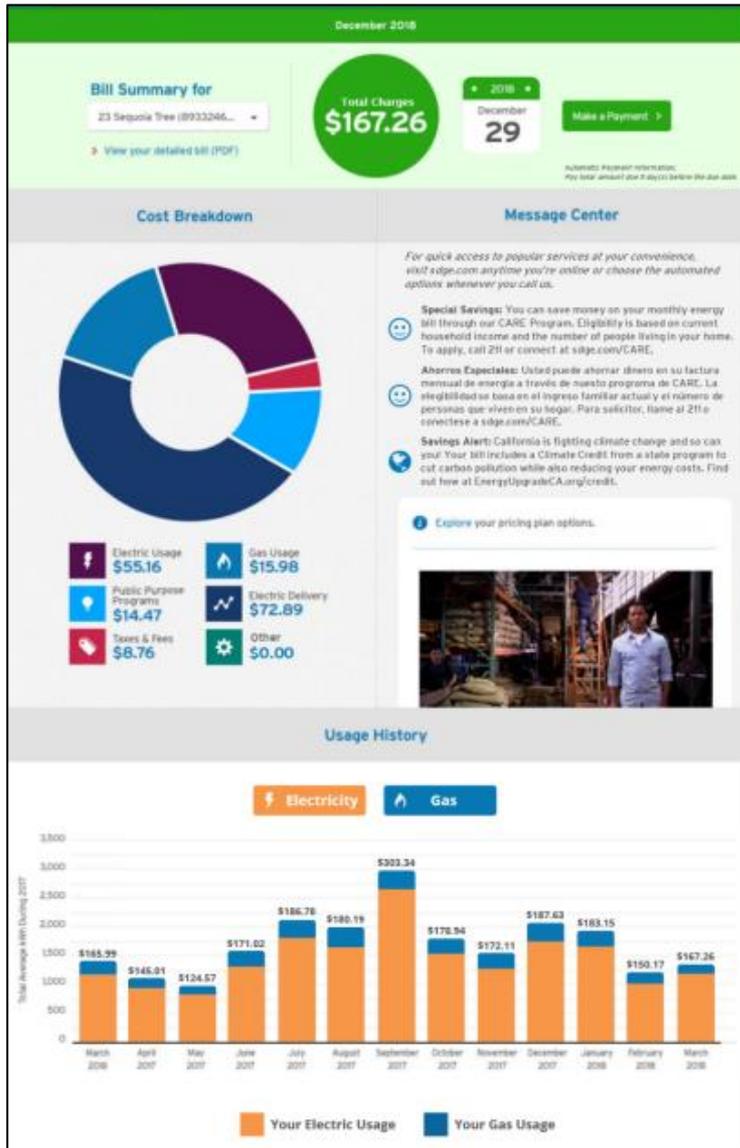
Your current SDG&E bill is now available online at [My Account](#). View this month's [bill inserts](#) which includes our newsletter.
 Using My Account you can also:

- Analyze your bill changes
- Set up spending alerts
- Get a forecast of your bill
- Make a one-time payment or schedule online automatic payments
- Request more time to pay your bill
- Reduce clutter and go paperless

To find out about available assistance programs, important safety information and more, go to [sdge.com](#).
 To make sure you continue to receive SDG&E My Account e-mail messages, please add do-not-reply@sdge.com to your contacts.
 SDG&E values your privacy. Check out our [Privacy Policy](#) and our [Privacy Notice](#).



Proposed Enhanced Bill Ready Notification



BMB-F-5

Time of Use Customers

- Create a template to illustrate on-peak, semi-peak and off-peak electricity use



Solar Customers

- Create a template for solar customers
 - Illustration of generation use
 - Solar Bank



Executive Summary – Financials

Project Costs

Project Totals	Project Capital (Rounded in Thousands)		Project O&M (Rounded in Thousands)				
	(Loaded)	(Unloaded)	(Loaded)	(Unloaded)			
Internal Labor	\$588	\$306	\$0	\$0			
Contract Labor	\$238	\$236	\$2	\$2			
Hardware	\$11	\$11	\$0	\$0			
Software	\$111	\$110	\$4	\$4			
Vendor Services	\$326	\$323	\$53	\$53			
Other (Incidentals)	\$3	\$3	\$0	\$0			
Administrative & General Loader	\$43	N/A	\$3	N/A			
SubTotal Estimate	\$1,321	\$989	\$61	\$58			
AFUDC	\$30	Start Date: 6/1/15	Completion Date: 1/15/16				
SubTotal Estimate + AFUDC	\$1,351	In Service Date: 12/11/15	Payback Calc (in yrs): 35.0				
GRC-TY2012 Incremental Expense (Net Income):	-\$505	First 5 Years Total Incremental Expense (Net Income)		\$1,268			
Annual Totals (Rounded in Thousands)	2015	2016	2017	2018	2019	Remaining Years Total	Total
Project O&M (Unloaded, no A&G, no AFUDC)	\$58	\$0	\$0	\$0	\$0	\$0	\$58
Project Capital (Loaded+A&G, no AFUDC)	\$1,252	\$69	\$0	\$0	\$0	\$0	\$1,321
Self Developed Software (Loaded+A&G, no AFUDC)	\$1,125	\$69	\$0	\$0	\$0	\$0	\$1,194

O&M Project Costs

- Includes 5% contingency
- Project O&M one-time loaded costs of \$59k
 - Change Management ~\$2k
 - Customer Education ~\$53k
 - Charting Software ~\$4K
- Post Project O&M one-time costs
 - Developer ~\$30k spread over 2 years

Post Project Annual Hard / Avoided Cost Benefits and O&M Cost

Annual Totals (Rounded In Thousands)		Functional Area / Cost Center(s) \$	2015	2016	2017	2018	2019	No O&M or Benefit Est.	Total	
O&M Cost (Unloaded, no A&G, no AFUDC)	Business	Labor	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
		Non Labor	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
	IT	Labor	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
		Non Labor	20% Developer Support - 2 years	\$1	\$14	\$14	\$0	\$0	\$0	\$29
Benefits (Unloaded, no A&G, no AFUDC)	Business	Labor	ESS call reduction	\$31	\$37	\$37	\$37	\$37	\$0	\$179
		Non Labor		\$0	\$0	\$0	\$0	\$0	\$0	\$0
	IT	Labor		\$0	\$0	\$0	\$0	\$0	\$0	\$0
		Non Labor		\$0	\$0	\$0	\$0	\$0	\$0	\$0
Asset Life (in yrs):									5	

BMB-F-7

Optimal Customer Bill Redesign Benefits



Customer Experience

Customer Satisfaction JD Power Billing and Payment Index Score (current score 727)

Anticipated increase 8-17 points



Increased Customer Understanding of Usage & Costs

Supports Rate Reform, Pricing Challenge, Time of Use Pricing and Rate Design Window



Customer Contact Center

Anticipated reduction from bill format related calls:

\$37,000 in annual savings

Additional Company Capabilities



ESS Visibility

- Enable the ability for ESS's to view personalized email data
- Today, ESS's can only view general templates



Central Billing Repository

- Creation of a central repository for billing information
- Can be leveraged by other projects (CPPD, Group Bill, C3)



Tailored Messaging

- Expand the ability to provide tailored messages
- Enable Next Best Offer email channel
- This ability can be leveraged by future projects



Tracking

- Enable the ability to track open rates
- Today we cannot track open rates for the Bill Ready Notification

BMB-F-8