

Application: A.17-04-027  
Exhibit No.: \_\_\_\_\_  
Witness: Snyder

**SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF  
CHARLIE SNYDER  
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY  
CHAPTER 11**



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

**August 7, 2017**

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1 **SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF**

2 **CHARLIE SNYDER**

3 **CHAPTER 11**

4 **I. PURPOSE**

5 This supplemental testimony is written in response to Administrative Law Judge  
6 (“ALJ”) Lirag’s July 17, 2017 oral ruling at the Prehearing Conference requesting  
7 supplemental information.<sup>1</sup> This testimony supports San Diego Gas & Electric Company’s  
8 (“SDG&E”) Customer Information System (“CIS”) Replacement Program Application 17-  
9 04-027, filed on April 28th, 2017 (“Application”) and discusses safety risk as it pertains to  
10 the legacy and future CIS.

11 **II. SAFETY OF LEGACY CIS**

12 In general, the legacy CIS does not pose a substantial safety risk and, as stated in the  
13 Application, the CIS Replacement Program will not result in any adverse safety impacts on  
14 facilities or operations of SDG&E.<sup>2</sup> In SDG&E’s 2016 Residual Risk Assessment, one risk  
15 measure described as the Negative Customer Satisfaction and Service Delivery Impacts  
16 Caused by Outdated Systems was Health, Safety and Environment.<sup>3</sup> SDG&E scored this  
17 risk parameter as a 1 (one). As shown in my initial direct testimony (Chapter 3, Attachment  
18 B - 7x7 Scoring Matrix), a score of 1 is “Negligible” and is defined as “No injury or illness  
19 or up to an un-reported negligible injury / No environmental impact.” That SDG&E has  
20 assessed that its outdated legacy CIS presents a negligible safety risk is not meant to

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<sup>1</sup> Prehearing Conference Transcript at p. 32:13-20.

<sup>2</sup> Application at p.10.

<sup>3</sup> Direct Testimony of Charlie Snyder (Chapter 3) at 8:13-17.

1 downplay SDG&E’s commitment to safety. Rather, the qualitative risk described above was  
2 scored based on relative criteria established within the scoring matrix.

3 SDG&E recognizes that system issues, including those involving the legacy CIS,  
4 may impact the ability to transmit key information to our field personnel. Key information,  
5 such as warning conditions stored within the legacy CIS, notify field personnel of any  
6 possible safety-related issues at customer premises (e.g., “bad dogs”). Also, during system  
7 outages, emergency field orders (e.g., gas leaks, downed power lines, etc.) may not be  
8 transmitted automatically to our field personal from the legacy CIS to our Service Order  
9 Routing Technology (“SORT”) system that is used to display and manage field orders.

10 However, SDG&E has processes in place to offset scenarios (e.g., system outages)  
11 associated with the inability to automatically send field orders. As an example, if the legacy  
12 CIS is down and an Energy Services Specialist (“ESS”) receives a call concerning a gas  
13 leak, the ESS will communicate (i.e., through fax, email, online form, etc.) a gas leak field  
14 order to dispatch, as well as perform a follow-up call to ensure dispatch received the order.  
15 The dispatcher in turn will communicate (i.e., through a call, radio, email, etc.) with the field  
16 technician and relay the required information for the technician to perform the field work.  
17 These established processes have been utilized effectively for many years.

### 18 **III. SAFETY OF PROPOSED CIS**

19 With respect to the proposed CIS replacement, SDG&E stands by its position, as  
20 stated in the Application, that the CIS Replacement Program will not result in any adverse  
21 safety impacts on the facilities or operations of SDG&E. If anything, SDG&E’s selection of  
22 SAP’s Customer Relationship and Billing (“CR&B”) solution to replace its existing legacy

1 CIS<sup>4</sup> will provide a more stable environment, which in turn should reduce CIS system  
2 interruptions and thereby reduce safety risks.

3 **IV. CONCLUSION**

4 At SDG&E, safety is not a goal – it is part of the company’s DNA. Nothing is more  
5 important than keeping our employees, contractors and the public safe.

6 This concludes my prepared supplemental direct testimony.

7 **V. STATEMENT OF QUALIFICATIONS**

8 My name is Charles (Charlie) Snyder. I am employed by San Diego Gas & Electric  
9 Company. My business address is 8330 Century Park Court, San Diego, California 92123.

10 I am currently a member of the Customer Information System replacement team. I  
11 began work at SDG&E in January 1996 as a member of the SORT system implementation  
12 team. I have held positions of increasing responsibility in the Customer Services  
13 organization including managing the Smart Meter Program, where my primary  
14 responsibilities included overall program management, customer communications, vendor  
15 management, deployment, regulatory affairs and financial management. Most recently, I  
16 was the manager for the Customer Services Program Management Office responsible for  
17 implementing key Customer Services system improvements and the introduction of new  
18 solutions. I have a Bachelors of Business Administration from National University in San  
19 Diego, CA.

20 I have previously testified before the California Public Utilities Commission.

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<sup>4</sup> Direct Testimony of Charlie Snyder (Chapter 3) at 15:7-12.