

**SDG&E NOI - 2016 TY RATE CASE**  
**SDCAN's FIRST SET OF DATA REQUESTS**

**General Questions**

1. Please provide a detailed listing of all media buys made by SDG&E during the period of January 2010 through December 2014. This should include all radio and TV spots purchased and/or run in San Diego, state or national media markets.
2. Please provide a detailed listing of all charitable contributions made by SDG&E or Sempra Parent Company to any and all charitable organizations located within San Diego County during the period of January 2010 through December 2014 .
3. Please provide all campaign finance disclosures filed by SDG&E, Sempra Parent Company or any utility-related PACs which made contributions to federal, state or local political office seekers during the period of January 2010 through December 2014 .
4. Please provide a listing of all "gifts" reported by SDG&E, Sempra Parent Company or any utility-related PACs given to holders of federal, local or state political office during the period of January 2010 through December 2014 .
5. Please provide a listing of all "gifts" reported by SDG&E, Sempra Parent Company or any utility-related PACs given to any individuals who work for any California regulatory body during the period of January 2010 through December 2014 .
6. Please provide an annual listing of any and all SDG&E employees who attended any CFEE-sponsored conferences during the period of January 2010 through December 2014. Please include a list of payments/booked costs for CFEE conferences in which SDG&E participated.
7. Please provide an annual listing of any and all professional consulting contracts entered into by SDG&E, with dates and amounts of the contracts, during the period of January 2010 through December 2014 .

8. Please provide an annual listing of any and all professional conferences sponsored by SDG&E or Sempra Parent Company, with dates and amounts of the sponsorships, during the period of January 2010 through December 2014 .
9. Please identify whether an annual list exists and, if so, of any and all payments paid by SDG&E or Sempra Parent Company as sponsorship for an event during the period of 2010 through 2014.
  - a. If yes, please provide the list.
  - b. If no, please explain why SDG&E does not maintain records to identify its expenses.
10. Please provide complete copies of all SDG&E's General Order 77-M filings at the CPUC beginning in 2010. Please include all filings made pursuant to superseded versions of General Order 77, i.e. 77-L, 77-K etc...

Budgeting

11. Please provide the written instructions provided to each SDG&E department during the January 2010 through December 2014 period which describes the process by which each department is to establish an annual budget. Please provide a copy of each benchmarking study, report, and analysis undertaken by SDG&E since 2010 and listed in response to UCAN DR 1-11.
12. Please provide in electronic format, the annual budgets for each SDG&E department during the January 2010 through December 2014 time period. In so doing, please show the initial annual budget submitted by each department and a column that shows the difference, in dollars and %, of what was sought by each department and what budget figure was ultimately adopted for each department. Thus, the tables for each year should resemble the following:

Department	2010 Budget Sought	2011 Budget Approved	Difference (\$)	Difference (%)

Department	2011 Budget Sought	2012 Budget Approved	Difference (\$)	Difference (%)

Department	2012 Budget Sought	2013 Budget Approved	Difference (\$)	Difference (%)

Department	2013 Budget Sought	2014 Budget Approved	Difference (\$)	Difference (%)

13. Please identify (by list) any departments at SDG&E which employed a zero-based budgeting process (i.e. all budget items are reviewed and built-up from zero) during the January 2010 through December 2014 time period.
14. Please describe any programs initiated during the January 2010 through December 2014 time period that initiated cost-cutting programs within SDG&E's departments.
15. Please identify any cost-cutting measures that generated annual savings in excess of \$1,000,000 for any SDG&E department during the January 2010 through December 2014 time period. In this response, please provide a copy of any reports generated by those consultants that were given to any members of senior management. Where the reports, or summary of said reports, were not given to senior management, please so indicate.
16. Please identify any and all memos, reports, directives or documents developed during the January 2010 through December 2014 time period by any SDG&E or Sempra Corporation which addresses or pertains to cost-cutting or operations streamlining efforts proposed to be or actually undertaken by SDG&E.
17. Please identify any outside consultants retained during the January 2010 through December 2014 time period specifically for the purposes of developing cost-cutting or greater operational efficiencies for any department within SDG&E.
18. Please identify any internal awards or formal recognition for innovations or operational efficiencies awarded to any SDG&E department during the January 2010 through December 2014 time period. In so doing, please:

- a. Specify the existence of an internal management award system by which individual employees are recognized for innovations or operational efficiencies.
  - b. Indicate which innovations or operational efficiencies earned such awards, (if any) during the 2010-2014 time period.
  - c. Quantify the savings generated by such innovations or operational efficiencies that earned recognition.
  - d. Quantify the cost of the payments or other cash-value items bestowed upon any employees that received such recognition.
  - e. If SDG&E does not conduct specific studies to evaluate expected benefits relative to costs as compared to actual benefits relative to costs. Please explain why SDG&E does not conduct studies or otherwise evaluate whether the actual benefits relative to costs are comparable to expected benefits and expected costs that it uses when requesting rate increases to fund these programs.
19. Please state whether any SDG&E employees were sent to professional conferences during the January 2010 through December 2014 time period whose topic was specifically focused on cost-cutting utility operations. If so, please identify the date, employees who attended and the title of said conference.
20. Throughout its testimonies SDG&E indicates that there is a need to hire new employees for various positions. Please state the total number of incremental positions SDG&E anticipates creating between 2016 and 2019 (i.e. above and beyond existing positions) . Please also provide a table that for each incremental position states:
- a. the title of the position,
  - b. the department,
  - c. whether the position is newly created or previously in existence,
  - d. whether the position is Full-Time Equivalent or Part-Time Equivalent,
  - e. the anticipated salary to be offered for the position, and
  - f. if the position was previously in existence the total amount of previously designated salary for that position that remains available for the position.

### **General and Administrative**

21. Copies of all surveys, as well as any and all documents that discuss the results of these surveys and the accompanying analysis, if any, conducted by or sponsored by SDG&E of its customers (limited to residential and

small business classes) January 2010 through December 2014 time period that address the following issues:

- a) Customer satisfaction with SDG&E's customer services
- b) Reliability of service
- c) Customer perception of rates
- d) Perception of conservation/DSM programs
- e) General perception of SDG&E and/or Sempra
- f) Any non-assigned customer surveys

22. Please provide the quarterly and annual results from the CSMS (Customer Service Monitoring System) survey for the January 2010 through December 2014 time period.

23. Please provide any and all statistics on the aggregate of payments made to customers and number of customers who availed themselves of the service guarantees adopted in D. 99-05-030. Included in this request is any memos, reports or documents that review the results of and effectiveness of the service guarantees.

24. Please provide the corporate goals and performance, if any, for the January 2010 through December 2014 time period for the following indicators:

- a) Percent of calls answered by a live agent compared to total calls answered;
- b) Number of complaints about field workers;
- c) Number of complaints about power quality;
- d) Number of incidents of low or high voltage conditions
- e) Number of complaints about customer service representatives

25. For all civil lawsuits by or against SDG&E that were either settled or resolved between 2007 and the present, please identify the following information for each civil lawsuit:

- a) Parties in the suit
- b) Date of case resolution
- c) Nature of cause of action
- d) Amount of award for or against SDG&E (for ratepayer accounts
- e) The FERC account in which the award was subtracted/added.

26. Please provide any electric value of service study applicable to SDG&E territory undertaken by the company or by parties known to SDG&E since 2005.
27. Please provide any documents, reports or memos produced for the general public by SDG&E since 2000 which compare SDG&E system average rates and/or customer class rates to other investor-owned or municipal utilities.
28. Please provide copies of any and all of SDG&E's documents, filings or submissions to the California Energy Commission since 2007 that relate to the Commission's on-going monitoring and publishing of comparative electric and gas rates (e.g. 2003 California Average Retail Electricity Rates By Major Utility or Utility-Wide Weighted Average Retail Electricity Prices)
29. Please provide any documents, reports or memos produced for the Public Utilities Commission by SDG&E since 2000 which compare SDG&E system average rates and/or customer class rates to other investor owned or municipal utilities.
30. Please provide copies of all SDG&E's 77-K filings at the CPUC since 2010.
31. Please provide copies of all of SDG&E's Security and Exchange Commission 10K filings since 2010.
32. Please provide copies of all of Sempra Energy Inc.'s Security and Exchange Commission 10K filings since 2010.
33. Please provide copies of all of Sempra's Annual Reports to Shareholders since 2010.
34. Please provide the annual reports submitted to the PUC on its meter reading performance pursuant to D. 02-05-001
35. Please provide any and all aggregate statistics available to the company since 2000 that show the number of estimated accounts per thousand meters read.
36. Please provide a detailed staffing breakdown (org chart) of all employees who work for or provide services under the auspices of SDG&E's Regional Public Affairs. This detailed breakdown should include a job description for each of the employees in this division.

37. Please provide the annual budgets for all expenses relating to the operations of the SDG&E Regional Public Affairs division during the January 2010 through December 2014 time period. These expenses should include the monies available for any consulting or services provided by other Sempra affiliates, the parent company or any third-party vendors. To the extent that this information is not included in testimony or workpapers, please provide this information.
38. Please provide a itemized breakdown (vendor name, project description, cost and date) of all third party vendor services conducted for the Regional Public Affairs division from January 2010 through December 2014 time period.
39. Please provide a list of all projects/activities worked on by the SDG&E Regional Public Affairs office during the January 2010 through December 2014 time period.
40. Please provide a listing (by year) of all monies paid to and description of work provided by a San Diego-based consulting group known as *Southwest Strategies LCC* for SDG&E and/or Sempra Corporate Parent during the January 2010 through December 2014 time period
41. Please provide a listing (by year) of all monies paid by SDG&E and/or Sempra to the San Diego County Taxpayers Association during the January 2010 through December 2014 time period.
42. Please provide a listing (by year) of all monies paid by SDG&E and/or Sempra to the San Diego Regional Economic Development Corporation during the January 2010 through December 2014 time period.
43. Please provide a listing (by year) of all monies paid by SDG&E and/or Sempra to the Greater San Diego Regional Chamber of Commerce during the January 2010 through December 2014 time period.
44. Please identify any memberships to golf courses and/or country clubs owned or paid for by Sempra, SDG&E or SoCal Gas. For each such payment during the January 2010 through December 2014 time period , please provide the amount and the account to which this cost is booked.
45. Please provide a list of any and all video presentations developed and/or paid for by SDG&E during the January 2010 through December 2014 time period that have been prepared for showing to the public.
46. Please identify the number of employees during each year during the January 2010 through December 2014 time period who have been issued a company credit card with which they can charge travel or entertainment

expenditures.

47. Please provide an annual sum for each year during the January 2010 through December 2014 time period of the costs charged to company credit cards.
48. Please state what, if any, current per diem or cost caps are in effect for company employees for lodging and dining costs incurred during travel in the 2007-2010 time frame. If these caps differ among employees, please provide a range of the current caps/per diems.

### **Sempra External Affairs**

49. Please provide a detailed staffing breakdown (org chart) of all employees who work for or provide services under the auspices of Sempra's External Affairs division. This detailed breakdown should include a job description for each of the employees in this division.
50. Please provide a itemized breakdown (vendor name, project description, cost and date) of all third party vendor services conducted for the External Affairs division during the January 2010 through December 2014 time period.

### **Customer Service Department**

51. Please provide a list of all new programs implemented since 2010 specifically designed to enhance or accelerate responsiveness to customers and/or improve quality of customer service.
52. Please provide a list of all SDG&E customer complaints that were actually the subject of adjudicatory hearings at the CPUC during the January 2010 through December 2014 time period and include, if possible, the outcomes of each of those litigated (or settled) matters.
53. Please provide a list of all SDG&E customer complaints lodged at the PUC's CAB division. If the CPUC doesn't provide SDG&E notice of such complaints, please specify that this is the case.
54. In regards to the Customer Communications department and its need for additional funding. Please provide any reports, memos or analysis conducted by SDG&E since 2002 which compared the efficacy and cost of using third-party vendors compared to in-house employees for the



- communications needs of SDG&E performed by this department.
55. Please provide any reports, memos or analysis developed by Customer Services Operations that discuss the cost effectiveness or efficacy of using Web-based services as a substitution for or complement to other customer outreach functions since 2002.
  56. Please provide an accounting for all of SDG&E's customer-service related web costs for the years 2007-2014. This should include the costs attributable to web-content development and the cost of web maintenance for customer information and customer service, but should not include meter data measurement costs.

### **Commercial/Industrial Customer Service**

57. In regards to the Commercial Industrial Customer Service department (CICS) please provide copies of the organization chart for this specific department.
58. For CICS, please the following information for this group:
  - a. provide a description of the functions of each of the managers in the group and subgroups of this department;
  - b. provide a quantification of the total number of employees (full and part-time) that serve in the departments and subdepartments
59. Please acknowledge that as part of the job descriptions of the employees in CICS, employees are permitted to invite SDG&E customers assigned to their account for dining or events for which SDG&E assumes the cost.
60. Please provide an accounting of third-party expenditures for the CICS (F1-F5) during the January 2010 through December 2014 time period.
61. Please also provide an accounting and general description for all costs reimbursed to CICS employees during the January 2010 through December 2014 time period.