ORA DATA REQUEST
ORA-SDGE-068-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 22, 2017
DATE RESPONDED: JANUARY 22, 2017

Exhibit Reference: Multiple
SDG&E Witness: Multiple
Subject: Organization Charts

Please provide the following:

1. As previously discussed verbally, SCE and SDG&E both use OrgPublisher10 to create and maintain organizational charts. During discovery in SCE's TY 2018 GRC, SCE provided a hyperlink that allowed ORA to interactively view all levels of the Edison International and SCE Utility organizations using OrgPublisher10 software that ORA installed on its computers. Provide a similar hyperlink that allows ORA to interactively view all levels of the Sempra, So Cal Gas, and SDG&E organizations. The interactive organization charts should show the following:

      a. Department names,

      b. Department numbers, if available,

      c. Total positions per department,

      d. Total occupied positions per department,

      e. Total vacant positions per department,
      f. Job titles for all vacant and occupied positions,

      g. Employee names,

      h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 1:
SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows:

The requested files do not exist and would be burdensome to create. Moreover, SDG&E has already provided ORA with the majority of the requested information - organization charts showing department names, positions, and structure - in its responses to the Master Data Request.

To the extent that ORA seeks information regarding "headcount," SDG&E does not use headcount in developing its GRC forecasts. The GRC presents base year and incremental personnel in the form of "Full-time equivalents (FTEs)."

ORA DATA REQUEST
ORA-SDGE-068-TCR
SDG&E 2019 GRC – A.17-10-007
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DATE RECEIVED: DECEMBER 22, 2017
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SDG&E Response 1:-Continued

 FTEs are calculated by taking the total annual hours worked (straight-time and overtime hours) divided by the total annual hours in that year.

Organization charts only provide a "headcount" snapshot at a given point in time.   Expected personnel changes in headcount are not reflected in the organization charts when forecasting incremental personnel for test year (TY) 2019.

Finally, SDG&E objects under Commission rules to providing employee names, because the request is not relevant to the issues before the Commission in the GRC, is not reasonably calculated to lead to admissible evidence, and is intrusive, and would affect employees' privacy and confidentiality rights.

As an alternative, SDG&E suggests that ORA could conduct an on-site review of the information in a visit to SDG&E headquarters in San Diego, or in our San Francisco office.

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2. If SDG&E is not able to provide interactive organization charts as described in Question 1 above, provide an explanation.

SDG&E Response 2:
See Response 1 above.

ORA DATA REQUEST
ORA-SDGE-068-TCR
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3. If SDG&E is not able to provide interactive organization charts as described in Question 1 above, provide an organization chart of the entire SDG&E organization that includes the following:

  a. Department names,

  b. Department numbers, if available,

  c. Total positions per department,

  d. Total occupied positions per department,

  e. Total vacant positions per department,

  f. Job titles for all vacant and occupied positions,

  g. Employee names,

  h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 3:
See Response 1 above.

ORA DATA REQUEST
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SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
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DATE RESPONDED: JANUARY 22, 2017

4. If not provided if response to Question 3 above, provide an organization chart of all organizations that contribute to the T&D work documented in Exhibits SDG&E-14 and SDG&E-15 that includes the following:

    a. Department names,

    b. Department numbers, if available,

    c. Total positions per department,

    d. Total occupied positions per department,

    e. Total vacant positions per department,

    f. Job titles for all vacant and occupied positions,
    g. Employee names,

    h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 4:
See Response 1.

ORA DATA REQUEST
ORA-SDGE-068-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 22, 2017
DATE RESPONDED: JANUARY 22, 2017

5. If not provided if response to Question 3 above, provide an organization chart of all organizations that contribute to the indirect charges allocated to T&D work documented in Exhibits SDG&E-14 and SDG&E-15 that includes the following:

    a. Department names,

    b. Department numbers, if available,

    c. Total positions per department,

    d. Total occupied positions per department,

    e. Total vacant positions per department,

    f. Job titles for all vacant and occupied positions,

    g. Employee names,

    h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 5:
See Response 1.

ORA DATA REQUEST
ORA-SDGE-068-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 22, 2017
DATE RESPONDED: JANUARY 22, 2017

6. If not provided if response to Question 3 above, provide an organization chart of all organizations that contribute to the IT work documented in Exhibit SDG&E-24 that includes the following:

 a. Department names,

 b. Department numbers, if available,

 c. Total positions per department,

 d. Total occupied positions per department,

 e. Total vacant positions per department,

 f. Job titles for all vacant and occupied positions,

 g. Employee names,

 h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 6:
See Response 1.

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SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
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7. If not provided if response to Question 3 above, provide an organization chart of all organizations that contribute to the indirect charges allocated to IT work documented in Exhibit SDG&E-24 that includes the following:

     a. Department names,

     b. Department numbers, if available,

     c. Total positions per department,

     d. Total occupied positions per department,

     e. Total vacant positions per department,

     f. Job titles for all vacant and occupied positions,

     g. Employee names,

     h. Cross references that show how one organization level is linked to those above and below it, for example as was provided in the organization chart provided in SDG&E's response to ORA MDR Section A General Requirements Question 20.

SDG&E Response 7:
See Response 1.

ORA DATA REQUEST
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Exhibit Reference: Multiple
SDG&E Witness: Multiple
Subject: Organization Charts

Please provide the following:

8. Provide the following for each of the five capital management governance teams listed in Exhibit SDG&E-14, page AFC-8 to AFC-14:

    a. Team name,

    b. Name, job title, and department name of each employee on the team as the date of this request,

    c. Description of changes to the team between the preparation of the GRC application and the date of this request,

    d. Description of known or anticipated changes to the team,

SDG&E Response 8:
SDG&E objects to the request for employee names on the grounds that the request is not relevant to the issues before the Commission in the GRC, is not reasonably calculated to lead to admissible evidence, and is burdensome and intrusive, as it would affect employees' privacy and confidentiality rights. Subject to and without waiving this objection, SDG&E responds as follows:

a. The teams are as follows (employee names are not provided)
The Reliability Assessment Team (RAT) consists of the following positions:
- Electrical Analysis and Solutions Manager, Electric Engineering
- Operating and Engineering District Managers, Electric Regional Operations
- Distribution Planning Manager, Electric System Planning & Grid Modernization
- Distribution Standards Manager, Electric Engineering
- Utility Engineers, Electric Engineering
- Substation Engineering Lead, Electric Engineering

The Substation Equipment Assessment Team (SEA Team) consists of the following positions:
- Substation Engineering Manager, Electrical Engineering
- Utility Engineers, Electric Engineering
- Substation Construction & Maintenance Manager, Kearny Maintenance & Operations
- Distribution Planning Lead, Electric System Planning & Grid Modernization
- Transmission Planning Lead, Electric System Planning & Grid Modernization
- Electric Analysis and Solution Manager, Electric Engineering

ORA DATA REQUEST
ORA-SDGE-068-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 22, 2017
DATE RESPONDED: JANUARY 29, 2018

SDG&E Response 8 Continued:

The Technical Review Committee (TRC) consists of the following positions:
- Distribution Planning Manager, Electric System Planning & Grid Modernization
- Substation Engineering Manager, Electric Engineering
- Distribution Standards Manager, Electric Engineering
- Regulatory Case Manager, Regulatory & Compliance
- Environmental Manager, Environmental Services
- Utility Engineers, Electric Engineering
- System Protection Manager, Electric Engineering
- Electrical Analysis and Solutions Manager, Electric Engineering
- Transmission Planning Manager, Electric System Planning & Grid Modernization

The Fire Directors Steering Team consists of the following positions:
- Electric Engineering Director, Electric Engineering
- Transmission & Substation Operations Director, Kearny Maintenance & Operations
- Electric Regional Operations Director, Electric Regional Operations
- Operations Risk Management Director, Operations Risk Management
- Electric Grid Operations Director, Electric Grid Operations
- Business Service Director, Business Service
- Emergency Management and Aviation Director, Emergency Management and Aviation
- Meteorology Manager, Emergency Management and Aviation
- Fire Program Management Manager, Emergency Management and Aviation

The Electric Transmission and Distribution Capital Team consists of the following positions:
- Electric Engineering Director, Electric Engineering
- Major Projects Director, Major Projects
- Electric System Planning and Grid Modernization Director, Electric System Planning & Grid Modernization
- Electric Grid Operations Director, Electric Grid Operations
- SDG&E Business Analyst, Various
- SDG&E Budget Owners, Various

b. Please see part a

c. None

d. None