ORA DATA REQUEST
ORA-SDGE-114-CY3
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: JANUARY 30, 2018
DATE RESPONDED: FEBRUARY 13, 2018

Exhibit Reference: SDG&E-18
SDG&E Witness: Jerry D. Stewart
Subject: Customer Services-Office Operations

Please provide the following:

1. Referring to Ex. SDG&E-18, page JDS-13, lines 17-18, "I am requesting $90,000 in labor above the BY 2016 for one Electric Meter Tester to manage work order growth." Please provide a chart or spreadsheet showing the number of employees who performed this function over the last 5 recorded years (2012-2016, 2017 if available).

SDG&E Response 01:

2017 data will not be available until mid-March. The table below shows the number of FTEs who performed this function over the last 5 recorded years.

	2012	2013	2014	2015	2016
Electric Meter Tester	7.8	8.8	11.3	9.9	12.5

As of BY 2016, of the 12.5 Electric Meter Testers (EMT), only 0.6 of an FTE performed shop orders. The field EMTs performed meter changeouts for various reasons including: compliance tests to verify accuracy and to stay compliant with regulations, miscellaneous electric troubleshooting and quality assurance work, customer requested meter testing and installation testing.

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2. Referring to Ex. SDG&E-18, page JDS-14, lines 12-14, "I am requesting $304,000 in labor above the BY 2016 to account for the full year 2016 impact of five new Apprentice Meter Testers ($205,000)…."

a. Please provide a chart or spreadsheet showing the number of employees who performed this function over the last 5 recorded years (2012-2016, 2017 if available).

b. Please provide the cost studies or calculations done to determine the request of $304,000.

SDG&E Response 02:

a. 2017 data will not be available until mid-March. The table below shows the number of FTEs who performed this function over the last 5 recorded years.

	2012	2013	2014	2015	2016
Apprentice Meter Tester	0.0	2.6	6.3	5.9	6.2

b. Please see workpaper page 10 in Exhibit SDG&E-18-WP for the calculations performed to determine the request of $304,000.

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3. Referring to Ex. SDG&E-18, page JDS-17, lines 5-9, "For the various reasons discussed above, I am requesting $923,000 in non-labor for 10 contract resources (Business Analysts), $680,000 in labor for 10 Single Phase Meter Technicians, and $70,000 in non-labor funding for tools to support meter data and communications exception management and field data collection activities related to Residential TOU Mass Default."

a. Please provide a chart or spreadsheet showing the number of employees who performed this function over the last 5 recorded years (2012-2016, 2017 if available).
b. Is there any precedent for hiring new labor for the aforementioned activities related to Residential TOU Mass Default?

SDG&E Response 03:

a. 2017 data will not be available until mid-March. The table below shows the number of FTEs who performed this function over the last 5 recorded years.

	2012	2013	2014	2015	2016
Single Phase Meter Tech	9.8	13.0	13.7	12.9	10.2
Business Analysts					5

As of BY 2016, of the 10.2 Single-Phase Meter Technicians (SPT), 5.9 FTEs performed field orders and 4.3 FTEs performed shop orders. The field SPTs performed read and verify orders due to meter non-communication, mitigation, and billing issues.

b. SDG&E objects to this request on the grounds that the term "precedent" is vague and ambiguous. Subject to and without waiving these objections, SDG&E responds as follows:

It is common practice in prior and current GRC workpapers to calculate the incremental costs attributable to anticipated additional workload. Please see workpaper page 21 in Exhibit SDG&E-18-WP for the calculations performed to determine the requests. The electronic versions were sent to ORA on October 25, 2017 and also in response to ORA-SDGE-107-CY3 Question 1.

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4. Referring to Ex. SDG&E-18, page JDS-21, lines 17-19, "I am requesting $1,277,000 in non-labor expense above the BY 2016 for one and a half Billing Supervisor resources and ten Billing Analyst resources to support a one-time 438% growth rate in interval data billing accounts." Please provide a chart or spreadsheet showing the number of employees who performed this function over the last 5 recorded years (2012-2016, 2017 if available).

SDG&E Response 04:

2017 data will not be available until mid-March. The table below shows the number of FTEs who performed this function over the last 5 recorded years.

	2012	**2013**	**2014**	**2015**	**2016**
Historical FTE (non-interval data/TOU Billing)	29	28	22	17	15
Growth & Interval Data FTE	16	16	17	18	22
Total Historical FTE (Billing)	45	44	39	35	37

Small and medium business customer meters that were previously billed from meter (register) reads are now billed from interval data. Historically, when a meter was billed via meter reads, two data points (start read and an end read) were used each month to bill consumption.

In early 2016, small and medium business meters were transitioned to interval data billing, billing went from using two data points each month to requiring approximately 2,880 data points to bill the customers' consumption (96 15-min intervals per day * 30 days in a billing period). With the increased amount of data points, there are challenges to timely and accurately bill a meter.

As described in the testimony of Jerry Stewart (Exhibit SDG&E-18, pages JDS-21 and JDS-22), these challenges included a significant increase exceptions when validating bill accuracy associated with the complexity of 18 different TOU rate schedules and interval data completeness, calculating the applicable non-bypassable charges, and the instability of SDG&E's aging billing system. Additionally, accounts that bill using interval data are more complex, not only because of additional data points and billing validations, but also because these accounts are often billing on a rate schedule that requires time-of-use billing periods to record consumption (kWh) and demand (kW) in order to calculate a bill.

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5. Referring to Ex. SDG&E-18, page JDS-23, lines 2-5, "I am requesting $2,255,000 in non-labor for expenses above BY 2016 for one contract Billing Supervisor position, one and a half contract Billing Team Lead positions, and thirteen contract Billing Analyst resources to support the 2018 Residential TOU Default Pilot Program and 2019 Residential TOU Default." Please provide a chart or spreadsheet showing the number of employees who performed this function over the last 5 recorded years (2012-2016, 2017 if available).

SDG&E Response 05:

2017 data will not be available until mid-March. The table below shows the number of FTEs who performed this function over the last 5 recorded years.

	2012	**2013**	**2014**	**2015**	**2016**
Historical FTE (Billing)	45	44	39	35	37
Residential TOU Default FTE	-	-	-	-	-
Total	45	44	39	35	37

The Residential TOU Default function did not exist historically. It is expected that 100,000 Residential customers will be defaulted to a TOU rate in 2018 and 800,000 customers will default to a TOU rate in 2019. These Residential meters will transition from billing using two data points to bill consumption each month to using between 720 and 2,880 data points (24 hourly intervals per day * 30 days in a billing period). In addition to the further complexities discussed in response to Question 4, SDG&E will need to account for billing exceptions related to the transition process from meter reads to interval data billing. It should also be noted that these customers will be eligible for bill protection for participating in one of the default rate schedules, which adds complexity and subsequent exceptions.