

**SOUTHERN CALIFORNIA GAS COMPANY**  
**RESPONSE TO CALIFORNIA PUBLIC UTILITIES COMMISSION DATA REQUEST**  
**REGARDING BUSINESS CONTINUITY AND COVID-19 RESPONSE PLANS**

**Date Requested: March 20, 2020**  
**Date Responded: March 27, 2020**

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**QUESTION 1:**

Please provide the company's policies for responding to and continuing operations through the current spread of COVID-19. This should include policies relating to providing safe working environments for your employees and business continuity plans for continuing all business and service delivery operations in the event of further community transmission.

**RESPONSE 1:**

In responding to and continuing operations through the current spread of COVID-19, the health, safety and wellbeing of Southern California Gas Company's (SoCalGas) employees and customers are foundational to our approach.

SoCalGas has contingency measures in place to mitigate workforce exposure in response to a major business disruption like COVID-19, as we continue the safe and reliable delivery of natural gas to our customers. Those measures are defined in our Business Resumption Plans (BRP) and are supplemented by various policies and protocols that have been specifically implemented in response to COVID-19. The purpose of SoCalGas's BRPs is to allow critical business functions to continue during and after a disaster with minimal interruption and to help resume critical operations within an acceptable timeframe.

See responses to later questions for the protocols and practices that SoCalGas has implemented specific to the COVID-19 circumstance.

SoCalGas's BRPs are confidential and are provided pursuant to P.U. Code Section 583, General Order 66-D Revision 1 and D.17-09-023. Redacted public versions will be provided at a later date.

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**QUESTION 2:**

As part of business continuity plan, indicate: 1) which essential functions can and cannot be performed remotely or transferred between locations?

**RESPONSE 2:**

Certain of SoCalGas's essential function information below in this narrative response is confidential and is provided pursuant to P.U. Code Section 583, General Order 66-D Revision 1 and D.17-09-023.

As a component of critical infrastructure, SoCalGas is an essential services provider of gas service. While there are some departments whose job functions are able to be performed remotely from home, there are other critical operations and core functions that cannot be performed remotely or transferred between locations.<sup>1</sup> For those essential functions not remote or transferred to multiple locations listed below, SoCalGas has implemented protective business practices to minimize the impact of COVID-19 to our workforce, customers and the public as detailed in Response 4 below.

1. Essential functions not remote or transferred to multiple locations
  - a. Engineering Analysis Center – performs multiple testing functions with specialized equipment. Some employees are working remotely, but several functions need to work at the Pico Rivera facility.
  - b. Training Services – performs training and qualification of company employees as well as welding and pipe fusing qualification for contractor resources. Performing employee qualification at different sites to enforce social distancing. Training where social distancing was not possible or required substantial sharing of equipment has been deferred. Training where social distancing is possible continues. SoCalGas is analyzing the possibility of deferring most of this training, except for critical functions such welding and initial operator qualification.
  - c. Meter Shop Operations – includes necessary work on meters used throughout the company for new services or replacements. SoCalGas is enforcing social distancing, surface cleaning and PPE guidelines.
  - d. Fleet Operations – fleet technicians are at every operating garage and are required to perform essential work on company vehicles and equipment located at their respective Districts.
  - e. Pico Warehouse Inbound and Outbound Operations-includes necessary work to provide materials for all field business departments. We implemented social distancing and employees do not work in close proximity to each other.

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<sup>1</sup> The critical operations and core functions SoCalGas identifies here are specifically exempted from California's statewide "Stay at Home" order, as well as local guidance addressing essential services.

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- f. Fabrication and Tool Shop-provides necessary materials, tools and tool repairs for all field business departments. We implemented social distancing and employees do not work in close proximity to each other.
  - g. Logistics Store Rooms- provide materials for all field business departments. We implemented social distancing and employees do not work in close proximity to each other.
2. Essential functions moved to remote
- a. Gas Distribution Dispatch (ARSO) – under normal operations, ARSO is in one reporting location at the Pico Rivera location and operates only during the workday. There are two back up sites fully tested and available. Currently, most ARSO dispatchers are working from home with a few reporting to the Pico Rivera facility. SoCalGas is enforcing social distancing, surface cleaning and PPE guidelines.
  - b. Engineering, Planning and GIS Posting – includes the planning of construction and maintenance work, including design, project planning, permitting and updating of SoCalGas’ mapping products in the GIS system.
  - c. Support Staff teams – includes functions that support the operations with a broad range of services including gas standards, risk management, data analysis and management, engineering reviews, technology operations, application support. These teams are currently telecommuting and may on occasion visit a company site to provide support to field personnel.
  - d. Inventory Management team providing support for all field business departments-this team is currently telecommuting and may on occasion visit a company site to provide support to field personnel.
3. Essential functions moved to multiple sites
- a. The Distribution, Transmission, Storage and Customer Service organizations responsible for operations, maintenance and construction work on natural gas facilities or provide service at customer sites are already located at multiple locations throughout SoCalGas’s service territory, therefore, additional relocation was not necessary. Job site reporting for field personnel, supervision and support personnel is utilized whenever possible.
  - b. Gas Control – there are various systems and requirements for Gas Control that do not allow it to be remote. Currently, Gas Control is working at two separate reporting locations:  
[REDACTED]  
[REDACTED]
  - c. Customer Contact Center – IT and phone network requirements currently prevent remote work capability. Integrating new technology could make this an option toward the end of Q2. Currently working at two locations with a third being built out and tested.  
[REDACTED]  
[REDACTED]

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- [REDACTED]
- d. Customer Services Dispatch (CSD) – under normal operations, CSD is in one reporting location at Monterey Park. CSD operates 24/7 and has specialized functions and phone lines making remote currently unavailable. Testing of partial remote capability is ongoing. CSD is currently operating at an additional three sites for a total of four

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- e. Emergency Operations Center (EOC) – under normal operations the EOC is in Los Angeles at the Gas Company Tower. Currently, we are distributed to two separate locations:

4. Essential functions already located at multiple sites

- a. The Distribution, Transmission, Storage and Customer Service organizations responsible for operations, maintenance and construction work on natural gas facilities or provide service at customer sites are already located at multiple locations throughout SoCalGas' service territory, therefore, additional relocation was not necessary. Job site reporting for field personnel, supervision and support personnel is utilized whenever possible.

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**QUESTION 3:**

How your company responds when employees are unable to work at their assigned job sites?

**RESPONSE 3:**

In general, our Business Resumption Plans have either back up company locations or work from home capability if an assigned job site is unavailable. Please see Response 2 for more detail on the relocation and distribution of certain essential functions.

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**QUESTION 4:**

How your company is responding to shelter in place orders, including for employees whose homes or job sites are in locations where such orders are in effect?

Comments:

Governor Newsom Executive Order directing stay at home statewide in California  
Critical Infrastructure Industry, following guidance for electric and natural gas utilities

1. Changes in services to limit public interactions to address social distancing guidelines from CDC and local public health authorities
2. Changes in services to address potential economic impacts (suspend disconnects and waive late fees)
3. Considering changes in operations to limit activities to essential activities where social distancing recommendations not compatible with safe work practices

**RESPONSE 4:**

SoCalGas has over 7,500 represented and non-represented employees. All of the recent shelter in place orders enacted in SoCalGas' service territory have exemptions for essential services including gas utilities. There are several steps SoCalGas has taken to limit public interaction, gatherings of more than ten employees, and maintain the recommended social distancing of six feet.

- SoCalGas implemented broad remote work plans for non-operational employees starting Monday, March 16, 2020. As of March 20, 2020, approximately 4,400 employees are working remotely, and additional functions are being evaluated to allow remote work on an ongoing basis.
- Certain essential functions have been spread out to multiple reporting locations, and access restrictions have been implemented for critical facilities (see Response 2)
- Staggered shifts have been instituted for field employees that need to report to a base location
- Signs are posted and instructions are given regularly to maintain social distancing of 6 feet and limit the number of employees gathered for meetings, training, and in locker rooms
- Employees still coming to a company work location have been spread out to maintain 6 feet of separation
- Limited in-person, non-essential meetings to less than 10 people coupled with 6 feet social distancing practices where possible
- Significantly increased the frequency of daily facility sanitization at all SoCalGas locations using hospital-grade disinfectants
- All non-essential domestic and international business air travel has been restricted until further notice
- Suspension of attendance at all conferences including local ones

Changes in Services:

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- Starting March 23, 2020, SoCalGas reduced certain in-home customer order types considered non-essential (CPUC notified March 20, 2020)
- Starting March 23, 2020, SoCalGas closed all 43 branch offices. Customers can still drop off payments at drop boxes at the payment offices, mail payments, pay by phone, etc. Signs have been posted at the branch offices with local alternate payment locations and a phone number for any gas emergencies. (CPUC notified March 20, 2020)
- SoCalGas proactively suspended customer disconnects, field collections, and will not charge late fees for its core customers. SoCalGas is also contacting customers who were disconnected since January 1, 2020 that want service and is waiving any re-connection fees. If requested, customers will also be offered payment plans.

Changes in Operations:

- SoCalGas is reviewing its safety and compliance projects to make sure employees and contractors can either adhere to proper social distancing guidelines or wear proper PPE where safety would be compromised. We are also reviewing what non-essential projects can be deferred and will contact the CPUC and other agencies, where appropriate, to seek clarification on compliance requirements.

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**QUESTION 5: (Assigned to Larry Andrews - Planning Chief)**

Whether continuity planning differs for pandemics versus events such as earthquakes or wildfires;

**RESPONSE 5:**

Yes, there is a difference between continuity planning for pandemic events versus events such as earthquakes or wildfires. Continuity planning for a pandemic is based on local, state, and federal orders and involves unique considerations, such as attrition of personnel, risk of exposure, and defining which essential services need to continue for the safety of the community. Pandemic response also deals with an evolving and dynamic scenario that does not terminate at a known date. The challenges and scope of impacts that might flow from a pandemic are unique as compared to disasters associated with events like wildfires and earthquakes, where the beginning and end of the disaster are more clearly defined.

In a wildfire or earthquake scenario, generally, the response is focused on repairing damage and bringing gas services back online. Typically, the disruption and/or degradation of service is clear, whereas in the current pandemic situation the disaster has not yet caused disruption or degradation of service. With respect to COVID-19, currently there are many unknowns as to the full scope and impact of this pandemic. Given the unprecedented nature of this crisis, SoCalGas continues to assess the COVID-19 situation and evaluate the effectiveness of its business continuity plans.



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**QUESTION 6:**

Has your company already activated your business continuity plan in response to COVID-19?

**RESPONSE 6:**

Yes, SoCalGas has activated its business resumption plans, and has added protocols and measures specific to the COVID19 circumstances, described further in the responses that follow.

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**QUESTION 7:** (Assigned to Maryam Brown - Deputy IC Comms and Reg/Leg)

Please also provide any communications distributed to your employees or customers about potential impacts to operations and service that may occur as a result of your company's COVID-19 response.

**RESPONSE 7**

Please see the attached communications.

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**QUESTION 8:**

Has your company implemented the CDC's interim guidance?

**RESPONSE 8:**

We have developed protocols on employee health and safety, as well as work methods, which are based upon and reference CDC guidance, as well as guidance from the Los Angeles Department of Public Health and a retained infectious disease specialist from UCSD.

See attachments to Response 8.

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**QUESTION 9:**

What effects might the spread of COVID-19 have on your call center?

**RESPONSE 9:**

The Call Center is housed in two separate locations (Redlands and San Dimas). SoCalGas recently set up another location in Monterey Park during this COVID-19 response. The Call Centers are considered critical business locations. Employees have been spaced at least 6 feet apart. Aside from distancing CSR workstations, we also opened up the auditorium at both sites in order to spread the tables and chairs in the lunch areas, added signage throughout the facility reminding employees to stay 6 feet apart from each other, and will continue to look at more space planning issues. We are implementing temperature taking and health screening protocols to identify employees with high fevers prior to entering the buildings. Anyone exposed to the virus is quarantined and their work area is cleaned according to CDC cleaning guidelines. The exposed employee will not be allowed to return to work until cleared by human resources. Non-call center employees who have traditionally worked at our call center locations have been relocated and access to the facility has been restricted.

If there were to be a high incidence of COVID-19 among call center personnel, we would close that site for a deep cleaning and re-staff it with workers from the other locations in order to maintain three working locations. If the level of absenteeism gets too high, we may only be able to take emergency calls/orders.

See attachments to Response 9.

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**QUESTION 10:**

What effects might the spread of COVID-19 have on your credit and collections processes?

**RESPONSE 10:**

SoCalGas has already suspended disconnects for core customers and is waiving late fees for core business customers (there are no late fees for residential customers). In order to limit further close interaction with customers, SoCalGas has also suspended all field collections and closed its branch offices to the public. SoCalGas is still monitoring its large customers and tracking their credit worthiness, and, in addition, SoCalGas also monitors how many customers are not paying their bills and any impacts that will have on SoCalGas' operating activity

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**QUESTION 11:**

Have you taken any actions or are you planning any actions for customers impacted by COVID-19, such as suspending disconnections or implementing bill payment plans?

**RESPONSE 11:**

See Response 4, above and attached communication to the CPUC on March 20<sup>th</sup>, 2020.

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**QUESTION 12:**

How will you communicate to the public about COVID-19 and your operations?

**RESPONSE 12:**

See the attached SoCalGas Communications Plan for Response 12.