

Application of SOUTHERN CALIFORNIA GAS )  
COMPANY for authority to update its gas revenue )  
requirement and base rates )  
effective January 1, 2024 (U 904-G) )

Application No. 22-05-015

Exhibit No.: (SCG-22-CWP-R)

REVISED CAPITAL WORKPAPERS TO  
PREPARED DIRECT TESTIMONY  
OF LANCE R. MUELLER  
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

AUGUST 2022



2024 General Rate Case - REVISED  
**INDEX OF WORKPAPERS**

**Exhibit SCG-22-CWP-R - CYBERSECURITY**

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Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

**Overall Summary For Exhibit No. SCG-22-CWP-R**

<b>Area:</b>	<b>CYBERSECURITY</b>
<b>Witness:</b>	<b>Lance R. Mueller</b>

**A. Cybersecurity**

**C.**

In 2021 \$ (000)		
Adjusted-Forecast		
2022	2023	2024
4,898	7,523	12,592
23,944	29,265	30,323
<b>Total</b>	<b>28,842</b>	<b>36,788</b>
	<b>42,915</b>	

*Note: Totals may include rounding differences.*

Southern California Gas Company  
 2024 GRC - REVISED  
 Capital Workpapers

Area:  
 Witness:  
 Category:  
 Workpaper:            VARIOUS

**Summary for Category:**

In 2021\$ (000)				
Adjusted-Recorded	Adjusted-Forecast			
2021	2022	2023	2024	
Labor				
Non-Labor				
NSE	0	0	0	0
<b>Total</b>				
FTE				

*Note: Totals may include rounding differences.*

**Beginning of Workpaper Group**  
**00745AA - RAMP Sensitive Data Protection**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection

**Summary of Results (Constant 2021 \$ in 000s):**

Forecast Method		Adjusted Recorded					Adjusted Forecast		
		2017	2018	2019	2020	2021	2022	2023	2024
Labor	Zero-Based	0	0	0	0	0	899	1,071	697
Non-Labor	Zero-Based	0	0	0	0	0	6,661	8,193	5,329
NSE	Zero-Based	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7,560</b>	<b>9,264</b>	<b>6,026</b>
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	7.5	8.9	5.8

**Business Purpose:**

The Sensitive Data Protection program helps reduce the risk of unauthorized access to and disclosure of the Companies' information by understanding where sensitive data is stored, how it is transmitted, and how it is used. This helps to further protect customer and Company information. The activities for this area will help the Companies continue the prudent management of sensitive data.

**Physical Description:**

The types of sensitive data activities include efforts such as identity access management (IAM) enhancements, data loss prevention (DLP), data crawler technology to identify sensitive data in the environment and mobile device security

Identity management, also known as identity and access management (IAM), is a framework of policies and technologies to ensure that the right users have the appropriate access to technology resources. Data loss prevention (DLP) is a solution or process that identifies confidential data, tracks that data as it moves through and out of the enterprise and prevents unauthorized disclosure of data by creating and enforcing disclosure policies. Mobile device security includes measures to protect against unauthorized loss of personal or business data, such as bank information, login information, and other data.

The non-labor capital costs for this category are primarily for the hardware and software materials for cybersecurity systems and contractor services. The labor capital costs for this category are for the employees assigned to design, build, and deploy the new systems.

**Project Justification:**

The activities funded under this area address the following: manipulated data or integrity failure, access control or confidentiality failure, cybersecurity control failures, human error, data corruption or unavailability, theft or destruction of systems and data, exposure of sensitive business information including customer records.

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
Witness: Lance R. Mueller  
Budget Code: 00745.0  
Category:  
Category-Sub:  
Workpaper Group: 00745AA - RAMP Sensitive Data Protection

**Forecast Methodology:**

**Labor - Zero-Based**

A zero-based method was utilized to develop the labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology

**Non-Labor - Zero-Based**

A zero-based method was utilized to develop the non-labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology

**NSE - Zero-Based**

n/a

**Beginning of Workpaper Sub Details for  
Workpaper Group 00745AA**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.001 - RAMP Sensitive Data Protection Labor 2022  
 In-Service Date: 12/31/2022  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)			
Years	2022	2023	2024
Labor	899	0	0
Non-Labor	0	0	0
NSE	0	0	0
<b>Total</b>	<b>899</b>	<b>0</b>	<b>0</b>
FTE	7.5	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.001 - RAMP Sensitive Data Protection Labor 2022

**RAMP Item # 1**

**RAMP Activity**

RAMP Chapter: SCG-Risk-6 Cybersecurity  
 RAMP Line Item ID: C03  
 RAMP Line Item Name: Sensitive Data Protection  
 Tranche(s): Tranche1: Overall

**GRC Forecast Cost Estimates (\$000)**

	2021 Historical Embedded Costs (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2022 to 2024 Forecast (2021 \$)	2022 to 2024 RAMP Range (2020 Incurred \$)	
						Low	High
Tranche 1 Cost Estimate	0	7,560	9,264	6,026	22,850	7,054	9,014

**Cost Estimate Changes from RAMP:**

RAMP high/low range incorporates the allocated splits for intercompany shared projects, whereas the GRC forecast reflects total projected cost.

**GRC Work Unit/Activity Level Estimates**

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2022 to 2024 Forecast Activities	2022 to 2024 RAMP Range Activities	
						Low	High
Tranche 1 n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Work Unit Changes from RAMP:**

Units were not defined during RAMP filing. Labor can be identified by forecasted FTEs, and for non-labor there is no single unit defined.

**Risk Spend Efficiency (RSE)**

	GRC RSE	RAMP RSE
Tranche 1	104.000	62.000

**RSE Changes from RAMP:**

General changes to risks scores or Risk Spend Efficiency (RSE) values are primarily due to changes in the Multi-Attribute Value Framework (MAVF) and RSE methodology, as discussed in the RAMP to GRC Integration testimony. Other than these changes, the RAMP-related activities described in my GRC testimony are consistent with the activities presented in the 2021 RAMP Report.

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.002 - RAMP Sensitive Data Protection NL Services 2022 (Same RAMP Item as 00745AA.001)  
 In-Service Date: 12/31/2022  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		6,661	0	0
NSE		0	0	0
	<b>Total</b>	<b>6,661</b>	<b>0</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.003 - RAMP Sensitive Data Protection Labor 2023 (Same RAMP Item as 00745AA.001)  
 In-Service Date: 12/31/2023  
 Description:

TBD

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	1,071	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>1,071</b>	<b>0</b>
FTE		0.0	8.9	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.004 - RAMP Sensitive Data Protection NL Services 2023 (Same RAMP Item as 00745AA.001)  
 In-Service Date: 12/31/2023  
 Description:

TBD

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	8,193	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>8,193</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.005 - RAMP Sensitive Data Protection Labor 2024 (Same RAMP Item as 00745AA.001)  
 In-Service Date: 12/31/2024  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	697
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>697</b>
FTE		0.0	0.0	5.8

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AA - RAMP Sensitive Data Protection  
 Workpaper Detail: 00745AA.006 - RAMP Sensitive Data Protection NL Services 2024 (Same RAMP Item as 00745AA.001)  
 In-Service Date: 12/31/2024  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	5,329
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>5,329</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

**Beginning of Workpaper Group**  
**00745AB - RAMP Operational Technology (OT) Cybersecurity**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity

**Summary of Results (Constant 2021 \$ in 000s):**

Forecast Method		Adjusted Recorded					Adjusted Forecast		
		2017	2018	2019	2020	2021	2022	2023	2024
Labor	Zero-Based	0	0	0	0	0	93	602	608
Non-Labor	Zero-Based	0	0	0	0	0	713	4,602	4,649
NSE	Zero-Based	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>806</b>	<b>5,204</b>	<b>5,257</b>
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.8	5.0	5.1

**Business Purpose:**

The OT Cybersecurity program focuses on securing the electric and gas control systems for the Companies . The OT environment is essential to critical business functions for the safe and reliable energy delivery to customers throughout the service territory. OT Cybersecurity requires a specialized approach in order to balance operational needs with cybersecurity risk.

**Physical Description:**

The Companies' cybersecurity program prioritizes operational technology activities , including the management of its existing technology assets, improving threat intelligence and vulnerability management, and securing the communication infrastructure. The Companies are focused on maintaining a secure operational environment to support safe, reliable gas and electric systems and service.

The OT Cybersecurity activities protect Industrial Control Systems (ICS) and Supervisory Control and Data Acquisition (SCADA) such as ensuring proper network segmentation, multifactor authentication (MFA), more secure remote connection capabilities, network anomaly detection, advanced security information and event management (SIEM) and analytics, environment network access control, environment endpoint detection response and malware defense.

Multi-Factor Authentication (MFA) is a network authentication method that requires the user to provide two or more verification factors to gain access to a resource such as an application, online account, or a private network. Network segmentation is a network security technique that divides a network into smaller, distinct sub-networks that enable network teams to compartmentalize the sub-networks and deliver unique security controls and services to each sub-network. SIEM captures event data from a wide range of sources across an organization's entire network. Logs and flow data from users, applications, assets, cloud environments, and networks is collected, stored and analyzed in real-time, giving cybersecurity teams the ability to automatically manage their network's event log and network flow data in one centralized location. Malware defense protects against intrusive software that is designed to damage and destroy computers and computer systems. Examples of common malware include viruses, worms, Trojan viruses, spyware, adware, and ransomware.

The non-labor capital costs for this category are primarily for the hardware and soft

**Project Justification:**

The activities funded under this area address the following: ransomware, infrastructure or availability failure, access control or confidentiality failure, malicious software intrusions, cybersecurity control failures, operational system failures, human error, disruption of energy flow systems, data corruption or unavailability, and serious injuries and fatalities.

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
Witness: Lance R. Mueller  
Budget Code: 00745.0  
Category:  
Category-Sub:  
Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity

**Forecast Methodology:**

**Labor - Zero-Based**

A zero-based to develop the labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**Non-Labor - Zero-Based**

A zero-based method was utilized to develop the non-labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology

**NSE - Zero-Based**

n/a

**Beginning of Workpaper Sub Details for  
Workpaper Group 00745AB**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity

Workpaper Detail: 00745AB.001 - RAMP Operational Technology (OT) Cybersecurity Labor 2022

In-Service Date: 12/31/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		93	0	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>93</b>	<b>0</b>	<b>0</b>
FTE		0.8	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.001 - RAMP Operational Technology (OT) Cybersecurity Labor 2022

**RAMP Item # 1**

**RAMP Activity**

RAMP Chapter: SCG-Risk-6 Cybersecurity  
 RAMP Line Item ID: C04  
 RAMP Line Item Name: Operational Technology (OT) Cybersecurity  
 Tranche(s): Tranche1: Overall

**GRC Forecast Cost Estimates (\$000)**

	2021 Historical Embedded Costs (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2022 to 2024 Forecast (2021 \$)	2022 to 2024 RAMP Range (2020 Incurred \$)	
						Low	High
Tranche 1 Cost Estimate	0	806	5,204	5,257	11,267	14,789	18,897

**Cost Estimate Changes from RAMP:**

RAMP high/low range incorporates the allocated splits for intercompany shared projects, whereas the GRC forecast reflects total projected cost.

**GRC Work Unit/Activity Level Estimates**

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2022 to 2024 Forecast Activities	2022 to 2024 RAMP Range Activities	
						Low	High
Tranche 1 n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Work Unit Changes from RAMP:**

Units were not defined during RAMP filing. Labor can be identified by forecasted FTEs, and for non-labor there is no single unit defined.

**Risk Spend Efficiency (RSE)**

	GRC RSE	RAMP RSE
Tranche 1	368.000	112.000

**RSE Changes from RAMP:**

General changes to risks scores or Risk Spend Efficiency (RSE) values are primarily due to changes in the Multi-Attribute Value Framework (MAVF) and RSE methodology, as discussed in the RAMP to GRC Integration testimony. Other than these changes, the RAMP-related activities described in my GRC testimony are consistent with the activities presented in the 2021 RAMP Report.

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.002 - RAMP Operational Technology (OT) Cybersecurity NL Services 2022 (Same RAMP Item as 00745AB.001)  
 In-Service Date: 12/31/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		713	0	0
NSE		0	0	0
	<b>Total</b>	<b>713</b>	<b>0</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.003 - RAMP Operational Technology (OT) Cybersecurity Labor 2023 (Same RAMP Item as 00745AB.001)  
 In-Service Date: 12/31/2023  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	602	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>602</b>	<b>0</b>
FTE		0.0	5.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.004 - RAMP Operational Technology (OT) Cybersecurity NL Services 2023 (Same RAMP Item as 00745AB.001)  
 In-Service Date: 12/31/2023  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	4,602	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>4,602</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.005 - RAMP Operational Technology (OT) Cybersecurity Labor 2024 (Same RAMP Item as 00745AB.001)  
 In-Service Date: 12/31/2024  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	608
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>608</b>
FTE		0.0	0.0	5.1

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AB - RAMP Operational Technology (OT) Cybersecurity  
 Workpaper Detail: 00745AB.006 - RAMP Operational Technology (OT) Cybersecurity NL Services 2024 (Same RAMP Item as 00745AB.001)  
 In-Service Date: 12/31/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	4,649
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>4,649</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

**Beginning of Workpaper Group**  
**00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application**  
**Replacement**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement

**Summary of Results (Constant 2021 \$ in 000s):**

Forecast Method		Adjusted Recorded					Adjusted Forecast		
		2017	2018	2019	2020	2021	2022	2023	2024
<b>Years</b>									
Labor	Zero-Based	0	0	0	0	0	0	859	868
Non-Labor	Zero-Based	0	0	0	0	0	0	6,575	6,642
NSE	Zero-Based	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7,434</b>	<b>7,510</b>
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.0	7.2	7.2

**Business Purpose:**

One of the fundamental practices that supports a strong cybersecurity program is the refresh of technology, both hardware and software, at regular intervals, to minimize risks posed by out of support technologies that lead to security risks. This is frequently referred to as “Foundational Technology Systems Lifecycle Management.” Technology lifecycles are short and require frequent upgrades to meet modern security standards and capabilities.

In addition to technology obsolescence, this approach also addresses security obsolescence. Security obsolescence refers to cybersecurity tools and processes that are no longer effective, or potentially could create new vulnerabilities. Vulnerabilities inherent in legacy technology can provide a foothold for entry or movement within the Companies’ environment. Failure to invest in modern technologies could degrade the value of modern investments due to compatibility restrictions. Replacing legacy technology is a necessary method of managing cybersecurity risk.

**Physical Description:**

The types of Obsolete IT Infrastructure and Application Replacement activities include technology refreshes and /or replacements of obsolete infrastructure, operating systems, middleware and applications. Additionally, there is the need to provide ongoing system maintenance activity to confirm continued secure configurations, patching, and upgrading, among others. Lastly, the need to utilize effective architecture and other mechanisms to confirm high availability and service continuity for critical systems.

The non-labor capital costs for this category are primarily for the hardware and software materials for cybersecurity systems and contractor services. The labor capital costs for this category are for the employees assigned to design, build, and deploy the new systems.

**Project Justification:**

The activities funded under this area address the following: unauthorized remote access and control, manipulated data or integrity failure, infrastructure or availability failure, access control or confidentiality failure, malicious software intrusions, cybersecurity control failures, operational system failures, disruption of energy flow systems, data corruption or unavailability, theft or destruction of systems and data, and exposure of sensitive company and customer data.

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement

**Forecast Methodology:**

**Labor - Zero-Based**

A zero-based method was utilized to develop the labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**Non-Labor - Zero-Based**

A zero-based method was utilized to develop the non-labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**NSE - Zero-Based**

n/a

**Beginning of Workpaper Sub Details for  
Workpaper Group 00745AC**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement

Workpaper Detail: 00745AC.001 - RAMP Obsolete IT Infra and App Replacement Labor 2023

In-Service Date: 12/31/2023

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	859	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>859</b>	<b>0</b>
FTE		0.0	7.2	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement  
 Workpaper Detail: 00745AC.001 - RAMP Obsolete IT Infra and App Replacement Labor 2023

**RAMP Item # 1**

**RAMP Activity**

RAMP Chapter: SCG-Risk-6 Cybersecurity  
 RAMP Line Item ID: C05  
 RAMP Line Item Name: Obsolete Information Technology (IT) Infrastructure and Application Replacement  
 Tranche(s): Tranche1: Overall

**GRC Forecast Cost Estimates (\$000)**

	2021 Historical Embedded Costs (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2022 to 2024 Forecast (2021 \$)	2022 to 2024 RAMP Range (2020 Incurred \$)	
						Low	High
Tranche 1 Cost Estimate	0	0	7,434	7,510	14,944	8,928	11,408

**Cost Estimate Changes from RAMP:**

RAMP high/low range incorporates the allocated splits for intercompany shared projects, whereas the GRC forecast reflects total projected cost.

**GRC Work Unit/Activity Level Estimates**

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2022 to 2024 Forecast Activities	2022 to 2024 RAMP Range Activities	
						Low	High
Tranche 1 n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Work Unit Changes from RAMP:**

Units were not defined during RAMP filing. Labor can be identified by forecasted FTEs, and for non-labor there is no single unit defined.

**Risk Spend Efficiency (RSE)**

	GRC RSE	RAMP RSE
Tranche 1	129.000	102.000

**RSE Changes from RAMP:**

General changes to risks scores or Risk Spend Efficiency (RSE) values are primarily due to changes in the Multi-Attribute Value Framework (MAVF) and RSE methodology, as discussed in the RAMP to GRC Integration testimony. Other than these changes, the RAMP-related activities described in my GRC testimony are consistent with the activities presented in the 2021 RAMP Report.

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement

Workpaper Detail: 00745AC.002 - RAMP Obsolete IT Infra and App Replacement NL Services 2023 (Same RAMP Item as 00745AC.001)

In-Service Date: 12/31/2023

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	6,575	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>6,575</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
 2024 GRC - REVISED  
 Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement  
 Workpaper Detail: 00745AC.003 - RAMP Obsolete IT Infra and App Replacement Labor 2024 (Same RAMP Item as 00745AC.001)  
 In-Service Date: 12/31/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	868
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>868</b>
FTE		0.0	0.0	7.2

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY

Witness: Lance R. Mueller

Budget Code: 00745.0

Category:

Category-Sub:

Workpaper Group: 00745AC - RAMP Obsolete Information Technology (IT) Infrastructure and Application Replacement

Workpaper Detail: 00745AC.004 - RAMP Obsolete IT Infra and App Replacement NL Services 2024 (Same RAMP Item as 00745AC.001)

In-Service Date: 12/31/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	6,642
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>6,642</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

**Beginning of Workpaper Group**  
**00745AD - RAMP Internal Defenses**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses

**Summary of Results (Constant 2021 \$ in 000s):**

Forecast Method		Adjusted Recorded					Adjusted Forecast		
		2017	2018	2019	2020	2021	2022	2023	2024
<b>Years</b>									
Labor	Zero-Based	0	0	0	0	0	1,717	851	1,333
Non-Labor	Zero-Based	0	0	0	0	0	13,861	6,512	10,197
NSE	Zero-Based	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15,578</b>	<b>7,363</b>	<b>11,530</b>
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	14.3	7.1	11.1

**Business Purpose:**

Internal Defense program activities are designed to detect and prevent unauthorized users, those misusing authorized credentials and malicious software (i.e., malware) from propagating inside of the perimeter and moving within the IT system or into the OT system. The enhancements to the Companies' IT and OT systems' Access Management system reduces the risk to internal systems and the likelihood and impact of a Cybersecurity incident. The activities in this category are designed to detect unauthorized users from moving laterally or vertically within the IT system or into the OT system, which improves the ability to identify and respond to threats more quickly.

**Physical Description:**

The types of internal defense activities include efforts such as more effective endpoint security monitoring, enhancements in threat and vulnerability management, insider threats, incident management, third party and supply chain risk mitigation, and cloud security.

Endpoint security solutions continuously monitor end-user devices to detect and respond to cyber threats like ransomware and malware. Threat and vulnerability management (TVM) is a combination of tools and processes that identify threats and vulnerabilities to reduce potential loss, damage or destruction of assets or data. Insider threats are a type of cybersecurity event where an insider employee or approved contract resource will use his or her authorized access, wittingly or unwittingly, to do harm to the Department's mission, resources, personnel, facilities, information, equipment, networks, or systems. Incident management is the process used by Cybersecurity teams to respond to an unplanned event or service interruption and restore the service to its operational state. Third party risk is the potential threat presented to organizations' employee and customer data, financial information and operations from the organization's supply-chain and other outside parties that provide products and/or services and have access to privileged systems. Cloud security entails securing cloud environments against unauthorized use/access, distributed denial of service (DDOS) attacks, hackers, malware, and other risks.

The non-labor capital costs for this category are primarily for the hardware and software materials for cybersecurity systems and contractor services. The labor capital costs for this category are for the employees assigned to design, build, and deploy the new systems.

**Project Justification:**

The activities funded under this area address the following: manipulated data or integrity failure, infrastructure or availability failure, access control or confidentiality failure, malicious software intrusions, cybersecurity control failures, operational system failures, equipment loss or theft, human error, data corruption or unavailability, theft or destruction of systems and data, and exposure of sensitive business information including customer records.

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
Witness: Lance R. Mueller  
Budget Code: 00745.0  
Category:  
Category-Sub:  
Workpaper Group: 00745AD - RAMP Internal Defenses

**Forecast Methodology:**

**Labor - Zero-Based**

A zero-based method was utilized to develop the labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**Non-Labor - Zero-Based**

A zero-based method was utilized to develop the non-labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**NSE - Zero-Based**

TBD

**Beginning of Workpaper Sub Details for  
Workpaper Group 00745AD**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.001 - RAMP Internal Defenses Labor 2022  
 In-Service Date: 12/31/2022  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		1,717	0	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>1,717</b>	<b>0</b>	<b>0</b>
FTE		14.3	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.001 - RAMP Internal Defenses Labor 2022

**RAMP Item # 1**

**RAMP Activity**

RAMP Chapter: SCG-Risk-6 Cybersecurity  
 RAMP Line Item ID: C02  
 RAMP Line Item Name: Internal Defenses  
 Tranche(s): Tranche1: Overall

**GRC Forecast Cost Estimates (\$000)**

	2021 Historical Embedded Costs (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2022 to 2024 Forecast (2021 \$)	2022 to 2024 RAMP Range (2020 Incurred \$)	
						Low	High
Tranche 1 Cost Estimate	0	15,578	7,363	11,530	34,471	10,816	13,821

**Cost Estimate Changes from RAMP:**

RAMP high/low range incorporates the allocated splits for intercompany shared projects, whereas the GRC forecast reflects total projected cost.

**GRC Work Unit/Activity Level Estimates**

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2022 to 2024 Forecast Activities	2022 to 2024 RAMP Range Activities	
						Low	High
Tranche 1 n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Work Unit Changes from RAMP:**

Units were not defined during RAMP filing. Labor can be identified by forecasted FTEs, and for non-labor there is no single unit defined.

**Risk Spend Efficiency (RSE)**

	GRC RSE	RAMP RSE
Tranche 1	110.000	95.000

**RSE Changes from RAMP:**

General changes to risks scores or Risk Spend Efficiency (RSE) values are primarily due to changes in the Multi-Attribute Value Framework (MAVF) and RSE methodology, as discussed in the RAMP to GRC Integration testimony. Other than these changes, the RAMP-related activities described in my GRC testimony are consistent with the activities presented in the 2021 RAMP Report.

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.002 - RAMP Internal Defenses NL Services 2022 (Same RAMP Item as 00745AD.001)  
 In-Service Date: 12/31/2022  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		13,861	0	0
NSE		0	0	0
	<b>Total</b>	<b>13,861</b>	<b>0</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.003 - RAMP Internal Defenses Labor 2023 (Same RAMP Item as 00745AD.001)  
 In-Service Date: 12/31/2023  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	851	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>851</b>	<b>0</b>
FTE		0.0	7.1	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.004 - RAMP Internal Defenses NL Services 2023 (Same RAMP Item as 00745AD.001)  
 In-Service Date: 12/31/2023  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	6,512	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>6,512</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.005 - RAMP Internal Defenses Labor 2024 (Same RAMP Item as 00745AD.001)  
 In-Service Date: 12/31/2024  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	1,333
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>1,333</b>
FTE		0.0	0.0	11.1

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category:  
 Category-Sub:  
 Workpaper Group: 00745AD - RAMP Internal Defenses  
 Workpaper Detail: 00745AD.006 - RAMP Internal Defenses NL Services 2024 (Same RAMP Item as 00745AD.001)  
 In-Service Date: 12/31/2024  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	10,197
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>10,197</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
Witness: Lance R. Mueller  
Category: A. Cybersecurity  
Workpaper: 00745B

**Summary for Category: A. Cybersecurity**

	In 2021\$ (000)			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Labor	0	560	870	1,352
Non-Labor	0	4,338	6,653	11,240
NSE	0	0	0	0
<b>Total</b>	<b>0</b>	<b>4,898</b>	<b>7,523</b>	<b>12,592</b>
FTE	0.0	4.7	7.3	11.3

**00745B RAMP Perimeter Defenses**

Labor	0	560	870	1,352
Non-Labor	0	4,338	6,653	11,240
NSE	0	0	0	0
<b>Total</b>	<b>0</b>	<b>4,898</b>	<b>7,523</b>	<b>12,592</b>
FTE	0.0	4.7	7.3	11.3

*Note: Totals may include rounding differences.*

**Beginning of Workpaper Group**  
**00745B - RAMP Perimeter Defenses**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses

**Summary of Results (Constant 2021 \$ in 000s):**

Forecast Method		Adjusted Recorded					Adjusted Forecast		
		2017	2018	2019	2020	2021	2022	2023	2024
<b>Years</b>									
Labor	Zero-Based	0	0	0	0	0	560	870	1,352
Non-Labor	Zero-Based	0	0	0	0	0	4,338	6,653	11,240
NSE	Zero-Based	0	0	0	0	0	0	0	0
<b>Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4,898</b>	<b>7,523</b>	<b>12,592</b>
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	4.7	7.3	11.3

**Business Purpose:**

The Perimeter Defenses program includes activities that the Companies take to protect the external access points of their internal information technology systems. Perimeter Defenses are designed to prevent attacks, protect the integrity of, and detect unauthorized access to the Companies' internal information technology systems .

**Physical Description:**

The types of perimeter defense activities include efforts such as firewall upgrades and process automation , web application firewall protections, distributed denial of service (DDoS) protection and the implementation of other perimeter defensive and threat mitigation mechanisms.

Firewalls provide protection against outside cyber attackers by shielding your computer or network from malicious or unnecessary network traffic. Web application firewalls (WAF) are a type of firewall that protects web applications from a variety of application layer attacks such as cross-site scripting (XSS), SQL injection, and cookie poisoning, among others. Perimeter defenses also include protections from distributed denial of service (DDoS) attacks in which attackers flood a network with high levels of malicious traffic so that it cannot operate or communicate as it normally would . This causes the site's normal traffic, also known as legitimate packets, to come to a halt.

The non-labor capital costs for this category are primarily for the hardware and software materials for cybersecurity systems and contractor services. The labor capital costs for this category are for the employees assigned to design, build, and deploy the new systems.

**Project Justification:**

Perimeter Defenses reduce the frequency or probability of successful external attacks to the private network. As a security strategy, it accomplishes this by limiting access to authorized users, reducing the likelihood that malicious code will enter the information technology environment, and delaying or frustrating potential attackers. This strategy also helps the Companies to understand the number of pathways into and out of the perimeter while simultaneously monitoring the perimeter in real time.

The activities funded under this area address the following: manipulated data or integrity failure, infrastructure or availability failure, access control or confidentiality failure, malicious software intrusions, cybersecurity control failures, operational system failures, equipment loss or theft, and human error. Perimeter Defenses reduces the potential consequences of data corruption or unavailability, theft or destruction of systems and data, and exposure of sensitive business information including customer records.

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
Witness: Lance R. Mueller  
Budget Code: 00745.0  
Category: A. Cybersecurity  
Category-Sub: 1. Perimeter Defenses  
Workpaper Group: 00745B - RAMP Perimeter Defenses

**Forecast Methodology:**

**Labor - Zero-Based**

A zero-based method was utilized to develop the labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**Non-Labor - Zero-Based**

A zero-based method was utilized to develop the non-labor forecast. See Cybersecurity testimony (Exhibit SCG-22) Section VI for discussion on capital forecast methodology.

**NSE - Zero-Based**

n/a

**Beginning of Workpaper Sub Details for  
Workpaper Group 00745B**

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.001 - RAMP Perimeter Defenses Labor 2022  
 In-Service Date: 12/31/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		560	0	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>560</b>	<b>0</b>	<b>0</b>
FTE		4.7	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.001 - RAMP Perimeter Defenses Labor 2022

**RAMP Item # 1**

**RAMP Activity**

RAMP Chapter: SCG-Risk-6 Cybersecurity  
 RAMP Line Item ID: C01  
 RAMP Line Item Name: Perimeter Defenses  
 Tranche(s): Tranche1: Overall

**GRC Forecast Cost Estimates (\$000)**

	2021 Historical Embedded Costs (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2022 to 2024 Forecast (2021 \$)	2022 to 2024 RAMP Range (2020 Incurred \$)	
						Low	High
Tranche 1 Cost Estimate	0	4,898	7,523	12,592	25,013	10,445	13,346

**Cost Estimate Changes from RAMP:**

RAMP high/low range incorporates the allocated splits for intercompany shared projects, whereas the GRC forecast reflects total projected cost.

**GRC Work Unit/Activity Level Estimates**

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2022 to 2024 Forecast Activities	2022 to 2024 RAMP Range Activities	
						Low	High
Tranche 1 n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**Work Unit Changes from RAMP:**

Units were not defined during RAMP filing. Labor can be identified by forecasted FTEs, and for non-labor there is no single unit defined.

**Risk Spend Efficiency (RSE)**

	GRC RSE	RAMP RSE
Tranche 1	134.000	160.000

**RSE Changes from RAMP:**

General changes to risks scores or Risk Spend Efficiency (RSE) values are primarily due to changes in the Multi-Attribute Value Framework (MAVF) and RSE methodology, as discussed in the RAMP to GRC Integration testimony. Other than these changes, the RAMP-related activities described in my GRC testimony are consistent with the activities presented in the 2021 RAMP Report.

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.002 - RAMP Perimeter Defenses NL Services 2022 (Same RAMP Item as 00745B.001)  
 In-Service Date: 12/31/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		4,287	0	5
NSE		0	0	0
	<b>Total</b>	<b>4,287</b>	<b>0</b>	<b>5</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.003 - RAMP Perimeter Defenses HW Maintenance 2022 (Same RAMP Item as 00745B.001)  
 In-Service Date: 06/30/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		15	0	0
NSE		0	0	0
	<b>Total</b>	<b>15</b>	<b>0</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.004 - RAMP Perimeter Defenses SW Maintenance 2022 (Same RAMP Item as 00745B.001)  
 In-Service Date: 06/30/2022

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		36	0	0
NSE		0	0	0
	<b>Total</b>	<b>36</b>	<b>0</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.005 - RAMP Perimeter Defenses Labor 2023 (Same RAMP Item as 00745B.001)  
 In-Service Date: 12/31/2023

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	870	0
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>870</b>	<b>0</b>
FTE		0.0	7.3	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.006 - RAMP Perimeter Defenses NL Services 2023 (Same RAMP Item as 00745B.001)  
 In-Service Date: 12/31/2023  
 Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	6,653	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>6,653</b>	<b>0</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.007 - RAMP Perimeter Defenses Labor 2024 (Same RAMP Item as 00745B.001)  
 In-Service Date: 12/31/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	1,352
Non-Labor		0	0	0
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>1,352</b>
FTE		0.0	0.0	11.3

*Note: Totals may include rounding differences.*

Southern California Gas Company  
2024 GRC - REVISED  
Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.008 - RAMP Perimeter Defenses NL Services 2024 (Same RAMP Item as 00745B.001)  
 In-Service Date: 12/31/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	10,340
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>10,340</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*

Southern California Gas Company  
 2024 GRC - REVISED  
 Capital Workpapers

Area: CYBERSECURITY  
 Witness: Lance R. Mueller  
 Budget Code: 00745.0  
 Category: A. Cybersecurity  
 Category-Sub: 1. Perimeter Defenses  
 Workpaper Group: 00745B - RAMP Perimeter Defenses  
 Workpaper Detail: 00745B.009 - RAMP Perimeter Defenses SW Maintenance 2024 (Same RAMP Item as 00745B.001)  
 In-Service Date: 06/30/2024

Description:

Workpaper Detail provides description of costs supporting the workpaper.

Forecast In 2021 \$(000)				
	Years	2022	2023	2024
Labor		0	0	0
Non-Labor		0	0	895
NSE		0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>895</b>
FTE		0.0	0.0	0.0

*Note: Totals may include rounding differences.*