

**DRA DATA REQUEST
DRA-SCG-DR-002
SOCALGAS 2012 COST OF CAPITAL – A.12-04-017
SOCALGAS RESPONSE
DATE RECEIVED: MAY 10, 2012
DATE RESPONDED: MAY 24, 2012**

1. Please provide copies of the Company's application and chapters/testimonies for all witnesses in Microsoft Word.

SoCalGas Response:

Please see the CD provided with this response.

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2. For all tables, exhibits, data appendices, charts, figures, and schedules in the Company's application and the testimonies/chapters of all witnesses, please provide copies of the associated data, the data sources, work papers, source documents, and calculations in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.

SoCalGas Response:

Please refer to SoCalGas' response to Question 3, below.

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3. Please provide: (1) copies of all source documents, articles, pages from books, investment reports, credit rating agency reports, regulatory decisions, work papers, and other sources used in the development and preparation of the application and each testimony/chapter; and (2) an index with testimony/chapter page number, the document that is being provided, the file name of the provided document, and page or tab numbers associated with the materials provided in (1).

SoCalGas Response:

SoCalGas objects to this question to the extent it requests copies of all Commission regulatory decisions and other filed Commission documents used in the development and preparation of the application and testimony on the grounds that these documents are publicly available to DRA. SoCalGas relied on all relevant law and precedent in the development and preparation of its application, including, but not limited to, the regulatory decisions cited therein. SoCalGas will provide all legal arguments and citations in briefs.

SoCalGas also objects to this question to the extent it requests documents and information that are copyrighted and proprietary in nature. Website citations have been provided for copyrighted information that is available online. Cited reference materials not within SoCalGas' control and possession have not been provided.

Credit rating agency reports are copyrighted materials available to paid subscribers and copies therefore cannot be provided to third parties, except in some instances by permission. SoCalGas is willing to make the credit reports from the major credit rating agencies published since January 1, 2010 on SoCalGas available at its offices for visual examination by requesting third parties to this proceeding.

SoCalGas Response 3(1):

The responsive documents have been provided in an accompanying CD.

SoCalGas submitted workpapers (Excel format) supporting the testimony of witness Michael Foster and witness Cheryl Shepherd to DRA via overnight Federal Express on April 20, 2012. The workpapers are responsive to this request.

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Response to Question 3 (Continued)

SoCalGas Response 3(2):

Schlax



DRA DR-002 Q3
index Schlax SCG.xls

Foster



DRA002 -
SCG-Foster Citations_

Shepherd



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Citations_and_Refere

Emmrich



Testimony citations
and references_Emm

Morin



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