

**LONG BEACH DATA REQUEST  
LB-SCG-029-JOH  
SOCALGAS 2019 GRC – A.17-10-008  
SOCALGAS RESPONSE  
DATE RECEIVED: DECEMBER 5, 2017  
DATE RESPONDED: DECEMBER 29, 2017**

**Request 1**

1. Please provide a copy of all intervenor data requests submitted to SoCalGas in this proceeding and SoCalGas' responses to those requests. Please treat this request as ongoing.

**SoCalGas Response 1:**

SoCalGas objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 030.060(g).

SoCalGas further objects to the definitions and instructions submitted by the City of Long Beach on the grounds that they are overbroad and unfairly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

Subject to and without waiving the foregoing objections, SoCalGas will provide all responsive documents in existence as of December 26, 2017. Should the City of Long Beach seek to update its request, SoCalGas will respond to such a request as a new data request in the future. Subject to and without waiving the foregoing objections, SoCalGas provides existing intervenor data request responses in the accompanying CD. Confidential responses and attachments are marked as **Confidential and Protected Materials Pursuant to P.U. Code Section 583, General Order 66-C/D, and D.16-08-024, and are accompanied by supporting declarations**. Access to such Protected Materials is restricted to those Reviewing Representatives who have signed the Non-Disclosure Certificate in ALJ Lirag's December 13, 2017 Protective Order. Pursuant to City of Long Beach counsel's request on December 22, 2017 that SoCalGas not include any responses containing confidential information related to the Morongo Rights-of-Way, SoCalGas confirms that no such confidential information is contained in this production.