

SOUTHERN CALIFORNIA GAS COMPANY
AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR
THE ANGELES LINK PROJECT

(A.22-02-007)

(1ST SET OF DATA REQUEST FROM CLEAN ENERGY)

Date Received: July 1, 2022; Date Responded: July 18, 2022

OBJECTIONS TO INSTRUCTIONS

SoCalGas provides the following Responses to the Clean Energy's data request dated July 1, 2022 in A.22-02-007. The Responses are based upon the best available, non-privileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas's possession, custody, or control. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by Clean Energy and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should Clean Energy seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas further objects to the instructions to the extent they ask SoCalGas to identify individuals directly or indirectly responsible for providing responses and to designate a witness to cross-examine at hearing concerning the response on the basis the instruction is unduly burdensome, including because the Assigned Commissioner's Scoping Memo and Ruling in this proceeding determines that evidentiary hearing is not needed.

SoCalGas additionally objects to the instructions to the extent they ask SoCalGas to provide "such data or documents as are available" if "information is not available in the exact form requested" on the basis the instruction is vague and ambiguous and unintelligible and fails to reasonably particularize the data or documents sought. SoCalGas also objects to the instructions to the extent they seek to impose the burden of resolving ambiguities in the request on SoCalGas and seek unduly burdensome stapling, bounding, and/or numbering.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding.

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DATA REQUEST RESPONSES

For the purpose of this data request, the following definitions apply.

“SoCalGas” includes SoCalGas and any of its corporate affiliates (including parents and subsidiaries), any of SoCalGas’s agents, and any other individual appearing to act on SoCalGas’s behalf, including advisors, consultants, and partner organizations.

“HyDeal Los Angeles” also refers to “HyDeal LA.”

QUESTION 1-1:

Regarding the relationship between SoCalGas and the Green Hydrogen Coalition:

- a. Please describe SoCalGas’s previous participation in, and activities related to, the Green Hydrogen Coalition from 2018¹ to the present.
- b. Please describe SoCalGas’s current and anticipated future participation in, and activities related to, the Green Hydrogen Coalition.
- c. Has all of SoCalGas’s participation in the Green Hydrogen Coalition and any related activities been funded exclusively by shareholders?
- d. If the answer to Question 1-1.c is not an unqualified yes, please:
 - i. Describe the participation and activities funded, directly or indirectly, by ratepayers.
 - ii. Itemize the costs borne, directly or indirectly, by ratepayers.
 - iii. Cite the legal authority for using ratepayer funds to support such participation and activities.
 - iv. Describe how the ratepayer costs have been calculated, tracked, recorded, and recovered.
 - v. Provide all communications and documents related to the calculation, tracking, recording, and recovery of the ratepayer costs.
 - vi. Provide all communications and documents related to SoCalGas’s ratepayer-supported participation in, and activities related to, the Green Hydrogen Coalition.

¹ SoCalGas believes the question intends to state 2019 – the year Green Hydrogen Coalition was founded

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RESPONSE 1:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Please see Response 1-6 to data request Indicated Shippers-01.
- b. Please see Response 1-6(a) to data request Indicated Shippers-01.
- c. Please see Response 1-6(c) to data request Indicated Shippers-01, which details SoCalGas's financial contributions to the GHC and indicates they were made with shareholder dollars. SoCalGas employees do not track time participating in certain stakeholder meetings and discussions organized and facilitated by GHC and therefore time spent would be in connection with each employee's default cost allocations.
- d. SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas additionally objects to the extent the request calls for legal conclusion. Finally, SoCalGas objects to this request to the extent it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

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QUESTION 2:

Regarding the relationship between SoCalGas and HyDeal Los Angeles:

- a. Please describe SoCalGas's previous participation in, and activities related to, HyDeal Los Angeles from 2020 to the present.
- b. Please describe SoCalGas's current and anticipated future participation in, and activities related to, HyDeal Los Angeles.
- c. Has all of SoCalGas's participation in HyDeal Los Angeles and any related activities been funded exclusively by shareholders?
- d. If the answer to Question 1-1.c is not an unqualified yes, please:
 - i. Describe the participation and activities funded, directly or indirectly, by ratepayers.
 - ii. Itemize the costs borne, directly or indirectly, by ratepayers.
 - iii. Cite the legal authority for using ratepayer funds to support such participation and activities.
 - iv. Describe how the ratepayer costs have been calculated, tracked, recorded, and recovered.
 - v. Provide all communications and documents related to the calculation, tracking, recording, and recovery of the ratepayer costs.
 - vi. Provide all communications and documents related to SoCalGas's ratepayer-supported participation in, and activities related to, HyDeal Los Angeles.

RESPONSE 2:

SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Please see Response 1-8 to data request Indicated Shippers-01
- b. Please see Response 1-8 to data request Indicated Shippers-01
- c. Please see Response 1-8(c) to data request Indicated Shippers-01, which details SoCalGas's financial contributions to the GHC for Hydeal LA and indicates they were

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made with shareholder dollars. SoCalGas employees do not track time participating in certain stakeholder meetings and discussions organized and facilitated by GHC for HyDeal LA and therefore time spent would be in connection with each employee's default cost allocations.

- d. SoCalGas objects to this request as overly broad and unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas also objects to the extent the request seeks information not within the scope of this proceeding as set forth in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas additionally objects to the extent the request calls for legal conclusion. Finally, SoCalGas objects to this request to the extent it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

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QUESTION 3:

Provide workpapers, supporting information, and any other documents attached to or produced with SoCalGas's responses to all data requests from other parties and any other discovery requests, including:

- a. Data Request PAO-1, Question 2.
- b. Data Request PAO-1, Question 20.
- c. Data Request Sierra Club-SoCalGas-01, Question 14.
- d. Data Request Sierra Club-SoCalGas-01, Question 16.
- e. Data Request UCAN-SOCALGAS-DR-01, Question 4.
- f. Data Request UCAN-SOCALGAS-DR-01, Question 4

RESPONSE 3:

Please see attached.