

Exhibit No: \_\_\_\_\_  
Docket No.: R.13-11-005  
Witness: Darren M. Hanway

**PREPARED DIRECT TESTIMONY OF**  
**DARREN M. HANWAY**  
**ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY**  
(OSC Ordered Items of Testimony 1 and 2)

January 10, 2020

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1                                   **PREPARED DIRECT TESTIMONY OF DARREN HANWAY**

2                                   **(OSC Ordered Items of Testimony 1 and 2)**

3   **I.       PURPOSE**

4                   The purpose of my prepared direct testimony on behalf of Southern California Gas  
5 Company (SoCalGas) is to address certain requirements in the December 2, 2019 Assigned  
6 Commissioner’s Amended Scoping Memo and Ruling for Order to Show Cause Against  
7 SoCalGas (Scoping Ruling). The Scoping Ruling directs SoCalGas to submit testimony related  
8 to its codes and standards advocacy, and prescribes that the testimony specifically:

- 9                   1)       Explain how SoCalGas accounts for codes and standards advocacy (C&S)  
10                   activities including but not limited to all the items Cal Advocates asked about in  
11                   its data requests;
- 12                   2)       Provide account entries for all C&S work charged to the Demand Side  
13                   Management Balancing Account since June 1, 2018, including a description of its  
14                   search to find any additional entries not previously identified;
- 15                   3)       Explain why the C&S activities cited in Cal Advocates’ motion as in SoCalGas’  
16                   Operation and Maintenance (O&M) and the General Rate Case (GRC) accounts  
17                   were charged to those accounts, and provides all relevant account entries for those  
18                   items; and
- 19                   4)       Provide any additional C&S-related charges in the O&M and GRC accounts and  
20                   explain how SoCalGas found them (as well as any accounting adjustments that  
21                   may have been made at any point to those charges).<sup>1</sup>

22 Items 3 and 4 above are addressed in the Prepared Direct Testimony of Deanna R. Haines. This  
23 testimony is limited to addressing items 1 and 2. Pursuant to the Scoping Ruling,<sup>2</sup> an officer  
24 verification is attached as Appendix C to this testimony.

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<sup>1</sup> Scoping Ruling, p. 4.

<sup>2</sup> *Id.* at p. 3.

1 **II. BACKGROUND**

2 Through the Energy Efficiency (EE) Codes and Standards (C&S) Program, which is part  
3 of SoCalGas’ approved EE portfolio,<sup>3</sup> SoCalGas saves energy on behalf of ratepayers by  
4 advocating and advising regulatory bodies such as the California Energy Commission (CEC) and  
5 the U.S. Department of Energy (DOE) on codes and standards designed to strengthen energy  
6 efficiency regulations. SoCalGas also conducts efforts to increase compliance with existing  
7 C&S regulations to help the State realize the savings from new codes and standards and supports  
8 local governments that include reach codes<sup>4</sup> as a climate strategy. In addition, through the  
9 program, SoCalGas conducts planning and coordination with the other Investor Owned Utilities  
10 (IOUs), as well as with local utilities and stakeholders, to optimize collaboration and code  
11 readiness activities to prepare for future codes.

12 SoCalGas’ EE Codes & Standards Program is composed of five subprograms, two of  
13 which are “Statewide,” per Decision (D.) 18-05-041.<sup>5</sup> The subprograms are: (1) Statewide  
14 Building Codes & Compliance Advocacy, (2) Statewide Appliance Standards Advocacy,  
15 (3) Compliance Improvement, (4) Reach Codes, and (5) Planning Coordination. The two  
16 Statewide programs are the subject of the Commission’s restriction in D.18-05-041, which limits  
17 SoCalGas to the role of transferring funds to the statewide codes and standards lead for  
18 implementation of the statewide programs. The three remaining subprograms (Compliance

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<sup>3</sup> D.18-05-041 approved SoCalGas’ business plan for the period of 2018-2025. Funding for SoCalGas’ Program Year (PY) 2018 EE portfolio was approved June 28, 2018 through Advice Letter (AL) 5183-A. Funding for SoCalGas’ PY 2019 EE portfolio was approved December 19, 2018 through AL 5349-A. Funding for SoCalGas’ PY 2020 EE portfolio was approved December 20, 2019 through AL 5510.

<sup>4</sup> Reach codes are typically codes adopted by local governments and provide a means to test new codes as well as testing the efficacy of increasing the stringency of existing codes at a local level prior to disseminating the code on a statewide basis.

<sup>5</sup> D.18-05-041, p. 91.

1 Improvement, Reach Codes, and Planning Coordination) are locally administered by SoCalGas,  
2 and are not restricted by the Commission or included in the scope of this Order to Show Cause.  
3 Further descriptions of each of the five subprograms can be found in SoCalGas' Energy  
4 Efficiency annual report.<sup>6</sup>

5 D.18-05-041 approved the energy efficiency business plans of eight program  
6 administrators, including SoCalGas.<sup>7</sup> As part of the final comment process on the EE Business  
7 Plan applications, the Public Advocates Office (then the Office of Ratepayer Advocates) (Cal  
8 Advocates), for the first time, brought forth allegations that SoCalGas had engaged in  
9 misconduct, including the opposition of the DOE's proposed new efficiency standard for  
10 residential furnaces,<sup>8</sup> an allegation SoCalGas refuted.<sup>9</sup> The Commission addressed the  
11 allegations in D.18-05-041, but importantly, did not decide whether or not Cal Advocates'  
12 allegations of misconduct against SoCalGas were valid.<sup>10</sup> Notably, Cal Advocates' allegations,  
13 and D.18-05-041's discussion of those allegations, concerned only activity undertaken by  
14 SoCalGas as part of SoCalGas' two Statewide EE C&S programs, which were part of its EE

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<sup>6</sup> Southern California Gas Company (U 904 G) Energy Efficiency Programs 2018 Annual Report (May 1, 2019), *available at*

[https://www.socalgas.com/regulatory/efficiency/docs/SCG\\_2018\\_Energy\\_Efficiency\\_Annual\\_Report-Final.pdf](https://www.socalgas.com/regulatory/efficiency/docs/SCG_2018_Energy_Efficiency_Annual_Report-Final.pdf).

<sup>7</sup> D.18-05-041, p. 2.

<sup>8</sup> ORA's Final Comments on EE Business Plan Applications, A.17-01-013 (and related matters) (September 25, 2017), *available at*

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M197/K203/197203791.PDF>.

<sup>9</sup> Final Reply Comments of Southern California Gas Company, A.17-01-013 (and related matters) (October 13, 2017), *available at*

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M197/K205/197205664.PDF>; Southern California Gas Company Motion to Strike Portions of Office of Ratepayer Advocate's Final Comments on Energy Efficiency Program Administrators' Business Plan Applications, A.17-01-013 (and related matters) (October 13, 2017), *available at*

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M197/K205/197205532.PDF>.

<sup>10</sup> SoCalGas strongly refuted Cal Advocates' allegations and continues to contest them, especially the allegation that SoCalGas engaged in any misconduct or misused ratepayer funds.

1 portfolio. As discussed further below, activities undertaken as part of SoCalGas' approved EE  
2 portfolio are tracked and recorded in SoCalGas' Demand-Side Management Balancing Account  
3 (DSMBA), which in turn is funded through the Public Purpose Program surcharge. The EE  
4 portfolio and the DSMBA are not part of SoCalGas' General Rate Case (GRC), which is a  
5 separate Commission proceeding.

6 After discussing Cal Advocates' allegations, D.18-05-041 prohibited SoCalGas from  
7 using EE ratepayer funding to participate in the "statewide"<sup>11</sup> EE codes and standards advocacy  
8 programs for the length of the business plan period, stating that "there is *potential* for SoCalGas  
9 to misuse ratepayer funds authorized for codes and standards advocacy, such that we find it  
10 reasonable to limit SoCalGas's involvement in codes and standards advocacy as ORA  
11 recommends."<sup>12</sup> The decision identifies the policy reason behind its prohibition as follows: "We  
12 do find, however, our initial authorization of *energy efficiency funding* for codes and standards  
13 advocacy makes clear our intent for *those funds*: '[u]sing ratepayer dollars to work towards  
14 adoption of higher appliance and building standards may be one of the most cost-effective ways  
15 to tap the savings potential for EE and procure least-cost energy resources on behalf of all  
16 ratepayers.'"<sup>13</sup> Thus, it is my understanding that the prohibition in D.18-05-041 applies to the  
17 two Statewide EE C&S programs that were part of SoCalGas' EE portfolio, and not to other  
18 activities potentially related to C&S advocacy that are *not* undertaken as part of the EE portfolio

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<sup>11</sup> In the time period immediately following the decision in D.18-05-041, SoCalGas reasonably interpreted D.18-05-041's prohibition of SoCalGas engaging in *statewide* EE C&S advocacy as not including federal advocacy activities given the decision's approval of SoCalGas', PG&E's and SCE's Business Plans, which proposed to establish a new federal level of EE C&S subprogram that would be *administered locally rather than statewide*. In an abundance of caution, SoCalGas determined shortly after the issuance of the decision that as part of its EE C&S advocacy programs it would not engage in federal codes and standards advocacy activity in addition to statewide codes and standards advocacy activity.

<sup>12</sup> D.18-05-041, p. 144 (emphasis added); *see also id.* at 193.

<sup>13</sup> *Id.* at 143 (emphasis added).

1 and which are subject to the approval of funding in other proceedings, such as the GRC. For the  
2 purposes of this testimony, further references to EE C&S advocacy all pertain to activities  
3 undertaken as part of SoCalGas' EE portfolio and the associated costs which are tracked in the  
4 DSMBA.

### 5 **III. ORDERED ITEM OF TESTIMONY 1**

6 The Scoping Ruling requires SoCalGas to “explain how SoCalGas accounts for codes  
7 and standards advocacy (C&S) activities including but not limited to all the items Cal Advocates  
8 asked about in its data requests.”<sup>14</sup>

9 The balancing account that records activity associated with SoCalGas' current EE  
10 portfolio is the DSMBA. All activities associated with delivering EE C&S advocacy programs  
11 as part of SoCalGas' EE portfolio fall into allowable administrative, marketing, and direct  
12 implementation cost categories within the authorized program. To correctly account for the  
13 program expenditure/activities in the Systems, Applications and Products (SAP) financial  
14 system, SoCalGas assigns an internal order (IO) number to the applicable program at the  
15 allowable cost category level (Administration, Marketing, Direct Implementation) to each of the  
16 EE C&S advocacy programs. In SAP, Statewide EE C&S advocacy program costs are captured  
17 utilizing the assigned IOs and cost elements so that the costs are posted to the program and to  
18 each program cost category. The costs posted to the program using IO numbers and cost  
19 elements are then captured and recorded to the DSMBA, which is part of the overall cost  
20 recorded to the DSMBA for SoCalGas' EE portfolio. In addition, the program manager reviews  
21 the monthly transactions related to the program to review the accuracy of charges, any  
22 irregularities, and proper tracking and reporting on the program. As discussed above, SoCalGas

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<sup>14</sup> Scoping Ruling, p. 4.

has two Statewide EE C&S advocacy programs as part of its EE portfolio. Costs associated with Statewide Building Codes & Compliance Advocacy and Statewide Appliance Standards Advocacy are charged to the following IOs listed in Table 1:

**Table 1:  
SoCalGas Statewide EE C&S Advocacy Subprogram IOs**

Authorized Budget Year	Building Codes & Compliance Advocacy		Appliance Standards Advocacy	
	2018	2019	2018	2019
Administration IO	300785799	300794335	300785803	300794338
Marketing IO	300785800	300794336	300785804	300794339
Direct Implementation IO	300785801	300794337	300785805	300794340

**IV. ORDERED ITEM OF TESTIMONY 2**

The Scoping Ruling requires SoCalGas to “provide account entries for all C&S work charged to the Demand Side Management Balancing Account since June 1, 2018, including a description of its search to find any additional entries not previously identified.”<sup>15</sup> For the purposes of this testimony, I address activity through November 30, 2019. SoCalGas has responded to numerous data requests from Cal Advocates concerning its C&S advocacy activity since June 1, 2018. SoCalGas has included an appendix containing its responses to these requests for reference.<sup>16</sup>

Prior to the issuance of the Scoping Ruling, SoCalGas previously identified \$8,715 in costs charged to the DSMBA that were associated with the two Statewide EE C&S advocacy

<sup>15</sup> Scoping Ruling, p. 4.

<sup>16</sup> Appendix A [SoCalGas’ Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019); SoCalGas’ Response to ORA-EF-SCG-2018-01 (August 2, 2018); SoCalGas’ Amended Response to CAL-ADVOCATES-HB-SCG-2018-13 (September 11, 2019); SoCalGas’ Amended Response to CAL-ADVOCATES-HB-SCG-2019-01 (September 11, 2019); SoCalGas’ Amended Response to CAL-ADVOCATES-HB-SCG-2018-03 (September 11, 2019); SoCalGas’ Response to CAL-ADVOCATES-HB-SCG-2019-10 (August 29, 2019)]



1 programs in SoCalGas' EE portfolio.<sup>17</sup> These costs corresponded to activities taken in the first  
2 40 days after the issuance of D.18-05-041, which were discussed in SoCalGas' Response to Cal  
3 Advocates Motion for an Order to Show Cause.<sup>18</sup> In addition, information on these activities  
4 was provided to Cal Advocates in SoCalGas' amended responses to Cal Advocates' data  
5 requests.<sup>19</sup> During the 40 days after the decision, SoCalGas was in a transition phase and was  
6 working to understand and to implement the prohibition in D.18-05-041. The activities  
7 undertaken during this time were (1) activities related to federal C&S advocacy which SoCalGas  
8 believed at the time were not covered by D.18-05-041's prohibition on "statewide" C&S  
9 advocacy,<sup>20</sup> (2) statewide C&S activities which were purely transitional in nature; and (3) a  
10 wrapping up of ongoing statewide C&S advocacy activities to a logical end date. In an  
11 abundance of caution and as a showing of good faith, SoCalGas transferred the amounts  
12 associated with the two Statewide EE C&S advocacy programs, as well as costs associated with  
13 federal C&S advocacy, during this 40-day period to shareholder funds.

14 In efforts to identify these entries, as well as to identify whether there were any additional  
15 entries that had not been previously identified, an additional review of the program costs  
16 captured under the assigned IOs for SoCalGas' 2018 and 2019 Statewide EE C&S Advocacy  
17 programs in SAP was conducted for the time period of June 1, 2018 to November 30, 2019.

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<sup>17</sup> See Appendix A [SoCalGas' Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019), Response to Q9(c) and Q10(c)].

<sup>18</sup> Response of Southern California Gas Company to the Motion of the Public Advocates Office for an Order to Show Cause Why Southern California Gas Company Should not be Sanctioned for Violating a Commission Order and Rule 1.1 of the Commission's Rules of Practice and Procedures, pp. 6-8 (July 30, 2019), *available at* <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M313/K821/313821404.PDF> (hereinafter "SoCalGas Response to Cal Advocates' Sanctions Motion").

<sup>19</sup> Appendix A [SoCalGas' Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019); SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-13 (September 11, 2019); SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2019-01 (September 11, 2019); SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-03 (September 11, 2019)].

<sup>20</sup> See footnote 11.

1 Costs posted to the programs within this period were reviewed by the assigned program manager  
2 as part of his usual job function. Any costs reviewed that were related to activities undertaken as  
3 part of the two Statewide EE C&S programs, as well as costs related to federal C&S advocacy  
4 activities, are identified in Appendix B. A review of the recorded allocated overhead was also  
5 conducted to identify any changes to the total amount of allocated overhead charged to  
6 SoCalGas' 2018 and 2019 statewide EE C&S Advocacy programs for the same June 1, 2018 to  
7 November 30, 2019 period.

8 Additional information about the approach taken in identifying DSMBA entries related to  
9 the two statewide C&S advocacy programs is provided below:

- 10 • Labor costs posted on or after June 1, 2018 – Any labor costs posted during this  
11 timeframe were reviewed. Labor costs for EE C&S Advocacy program activities  
12 were identified by speaking to the individual employee who was engaged in EE  
13 C&S advocacy activities as part of the EE portfolio during this timeframe. This  
14 employee is a salaried employee. SoCalGas' salaried employees do not track  
15 their time each day with the intent of reporting out an hourly log of activities.  
16 Nevertheless, SoCalGas asked this employee to provide the best estimate of the  
17 time spent on activities related to the two Statewide EE C&S advocacy programs  
18 since June 1, 2018. The employee did this by, in part, reviewing emails and  
19 calendar entries. After receiving the estimated time, SoCalGas then calculated an  
20 "hourly rate" for this employee by using the salary and a presumed 40 hour work  
21 week. SoCalGas next calculated labor costs associated with the identified  
22 activities based on that hourly rate and the number of hours estimated by the  
23 employee as being spent on activities undertaken as part of the two Statewide EE  
24 C&S advocacy programs. The amount of labor costs in the DSMBA associated  
25 with the two C&S advocacy programs after June 1, 2018 was also reviewed. The  
26 amount in the DSMBA did not correspond with the amount calculated by  
27 SoCalGas, primarily due to an accounting system error. SoCalGas corrected the  
28 amount in labor costs reflected in the DSMBA as being associated with the two  
29 statewide EE C&S advocacy programs to reflect the actual estimated labor time  
30 spent (and associated costs) by the employee.
- 31 • Non-labor costs posted on or after June 1, 2018 – Any non-labor costs associated  
32 with Statewide EE C&S Advocacy program activities posted during this  
33 timeframe were first reviewed to determine whether or not the costs were for the  
34 purpose of transferring ratepayer funds to the statewide lead for C&S. Per D.18-  
35 05-041, SoCalGas transfers funds to the statewide lead for C&S (Pacific Gas and  
36 Electric Company) and these cost entries appear in the DSMBA. Any non-labor

1 costs recorded during this timeframe that were not for this purpose were then  
2 identified.

- 3 • Allocated overhead related to labor and non-labor costs recorded on or after  
4 June 1, 2018 – SoCalGas reviewed the current value of allocated overhead  
5 charged to the EE Statewide C&S Advocacy programs for the identified period.  
6 If a change in the recorded costs was found based on the last identified value, the  
7 variance is identified to inform this proceeding.<sup>21</sup>

8 As part of this testimony, three tables have been included in Appendix B which detail the  
9 account entries for costs associated with the activities undertaken under the two Statewide EE  
10 C&S advocacy programs in SoCalGas' EE portfolio from June 1, 2018 to November 30, 2018,  
11 and which are reflected in the DSMBA. These attachments are:

- 12 1. C&S advocacy program account entries for the period of June 2018-November  
13 2019 by IO and Cost Element;
- 14 2. Labor correction account entries to local C&S programs by IO and Cost Element;  
15 and
- 16 3. C&S advocacy program allocated overhead for the period of June 2018-  
17 November 2019.

18 Through this review process, SoCalGas had identified \$8,731 in costs associated with  
19 activities undertaken under the two Statewide EE C&S advocacy programs conducted in the  
20 months of June and July of 2018. SoCalGas has not identified any new activities that were not  
21 already included in its amended responses to data requests from Cal Advocates.<sup>22</sup> These costs  
22 consist of \$873 in labor costs; \$252 in allocated labor overhead expenses (*i.e.* payroll tax and  
23 vacation and sick costs); and invoiced consultant activities (non-labor) of \$463, \$5,600, and  
24 \$1,544.

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<sup>21</sup> See Appendix A [SoCalGas' Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019), Response to Q9; SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-03 (September 11, 2019), Response to Q5].

<sup>22</sup> See Appendix A [SoCalGas' Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019); SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-13 (September 11, 2019)].

1 SoCalGas provides the following additional information regarding allocated overhead  
2 costs and estimated labor expenses associated with the two Statewide EE C&S programs:

- 3 • Additional credits were recorded to the C&S Advocacy programs allocated  
4 overhead costs since last identified in SoCalGas' amended response to Cal  
5 Advocates.<sup>23</sup> The last identified value for allocated overheads was a net credit in  
6 the amount of (\$538). The current total Allocated Overhead cost recorded to  
7 C&S Advocacy programs for the period of June 1, 2018 to November 30, 2019 is  
8 a net credit of (\$3,466). The change in credit value is due in part to the transfer of  
9 C&S Advocacy program costs for activities on or after June 1, 2018 from the  
10 DSMBA to shareholder funded accounts. As these overhead costs are for support  
11 of the entire portfolio, allocations are determined using a weighted average  
12 spread. SoCalGas has not charged this credit against the amount moved from the  
13 DSMBA to shareholder funded accounts.<sup>24</sup>
- 14 • Due to a system limitation in SoCalGas' SAP system, a portion of the previously  
15 identified \$8,715 to be transferred to shareholders from the DSMBA was based  
16 on an estimate of certain allocated labor overhead expenses (Vacation and Sick  
17 and Payroll Tax) that is system generated. Previously estimated to be \$236, the  
18 system generated value to be transferred to shareholders from the DSMBA was  
19 actually \$252. Thus, the total cost that will be transferred to shareholders from  
20 the DSMBA is \$8,731.
- 21 • As discussed above, corrections in SoCalGas' SAP system were made for an  
22 accounting system error where a default percentage of labor time charged to the  
23 C&S Advocacy programs in June and July of 2018 did not accurately reflect the  
24 amount of labor time and costs for the SoCalGas employee working on C&S  
25 Advocacy as part of the EE portfolio.<sup>25</sup> To correct for this error, \$14,453 of direct  
26 implementation labor costs for June and July 2018 were transferred to SoCalGas'  
27 local C&S subprograms Compliance Enhancement (IO 300785809), Reach Codes  
28 (IO 300785813), and Planning Coordination (IO 300785817), which the  
29 SoCalGas employee was supporting during that time and which correctly reflects  
30 the labor time spent by this SoCalGas employee.

31  
32 This concludes my prepared direct testimony.

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<sup>23</sup> Appendix A [SoCalGas' Amended Response to ORA-HB-SCG-2018-09 (September 11, 2019), Response to Q9 and Q10(c); SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-03 (September 11, 2019), Response to Q5].

<sup>24</sup> Appendix A [SoCalGas' Amended Response to CAL-ADVOCATES-HB-SCG-2018-03 (September 11, 2019), Response to Q5].

<sup>25</sup> See SoCalGas Response to Cal Advocates' Sanctions Motion, pp. 11-12.

1 **V. QUALIFICATIONS**

2 My name is Darren M. Hanway. My business address is 555 West Fifth Street,  
3 Los Angeles, California, 90013-1011. I am employed by SoCalGas as the Manager of Energy  
4 Programs and Strategy in the Customer Programs and Assistance Department.

5 I joined SoCalGas in October of 2012 to lead the energy efficiency policy support team.  
6 In December 2015, I assumed my current position. My current responsibilities include the  
7 management of the company's energy efficiency programs, including residential, commercial,  
8 industrial, agricultural, workforce education and training, and codes and standards offerings. I  
9 also oversee the company's demand response and solar thermal programs.

10 Prior to joining SoCalGas, I held positions of increasing responsibility at Southern  
11 California Edison working on their demand-side program offerings. I received a Bachelor  
12 of Science degree in Business Administration and a Bachelor of Arts degree in  
13 International Relations from the University of Southern California in 2003. I have previously  
14 testified before the Commission.

# APPENDIX A

SoCalGas' Amended Response to ORA-HB-SCG-2018-09  
(September 11, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST**  
**(DATA REQUEST ORA-HB-SCG-2018-09)**  
**DATE RECEIVED: JUNE 29, 2018**  
**DATE SUBMITTED: JULY 16, 2018**  
**DATE AMENDED: SEPTEMBER 11, 2019**

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**Preliminary Statement**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

For the purposes of these responses, SoCalGas understands the phrase “energy efficiency codes and standards advocacy” to mean conduct directly concerning statewide energy efficiency codes & standards advocacy, as delineated in Decision 18- 05-041. The activities therefore do not include activities for local programs, such as compliance, and reach codes, ~~and engagement with the Department of Energy (“DOE”).~~ See Decision (D.) 18-05-041 at 12, 91; SoCalGas Business Plan at 298, PG&E Business Plan at 548, Southern California Edison Business Plan at 224. ~~In addition, SoCalGas has continued to monitor and be passively involved with statewide energy efficiency Codes & Standards advocacy. Therefore, the time, work, and personnel identified in the below responses include instances where SoCalGas employees were, for example, not “participating” in energy efficiency codes and standards (EECS) advocacy, but were merely present for a call.~~ This understanding applies to all responses below unless it is stated otherwise.

At the time of serving its original responses (July 16, 2018), SoCalGas reasonably interpreted D.18-05-041 as not prohibiting federal advocacy activities given the decision’s approval of SoCalGas’, PG&E’s, and SCE’s Business Plans, which proposed to establish a federal level of EE codes and standards subprogram that would be *administered locally rather than statewide*. This was communicated to Cal Advocates in a preliminary statement to SoCalGas’ initial responses. Based on this interpretation, SoCalGas did not include information on federal advocacy activities in some of its initial responses, although it did provide all documents related to federal advocacy activities that were requested by Cal Advocates in response to Cal Advocates’ Questions 13-16. Within about a month of serving its initial responses, and after a meeting with representatives from Energy Division, SoCalGas determined that in an abundance of caution it would not participate in EE federal codes and standards advocacy in addition to EE statewide codes and standards advocacy. While SoCalGas continues to believe that it is unclear whether D.18-05-041 covers federal advocacy activities, it has decided to take a cautious approach until there is further clarity provided by the Commission on the issue. SoCalGas has amended its responses to provide information on any EE federal codes and standards advocacy activity called for by Cal Advocates. Although SoCalGas’ original responses were served on July 16, 2018, SoCalGas has interpreted any requests that are open ended (i.e. “on or after June 6, 2018”), as applying up to the



**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST**  
**(DATA REQUEST ORA-HB-SCG-2018-09)**  
**DATE RECEIVED: JUNE 29, 2018**  
**DATE SUBMITTED: JULY 16, 2018**  
**DATE AMENDED: SEPTEMBER 11, 2019**

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date the amended responses are served.

SoCalGas' responses do not include information on activities related to energy efficiency codes and standards advocacy that do not have or have not had energy efficiency funding unless Cal Advocates has identified a specific non energy efficiency funded activity in its request that it is seeking information on. Such activities are outside the scope of D.18-05-041's prohibition of SoCalGas engaging in energy efficiency codes and standards advocacy. (See D.18-05-041, p. 144 ["As the scope of this proceeding is limited to consideration of the 2018 – 2025 business plans..."]; *Id.* at 143 ["We do find, however, our initial authorization of *energy efficiency funding* for codes and standards advocacy makes clear our intent for *those funds*. . .]; see also D. 13-12-043, pp. 9, 13, 15 [cost allocations out of scope where they were being reviewed in another proceeding]; D.03-10-086, pp. 41, 48 [where funding not included in scope, it should be considered in other proceeding].)

**QUESTION 1:**

How many hours did SoCalGas personnel spend on energy efficiency codes and standards (EECS) advocacy activities from June 1, 2018 to June 5, 2018?

**RESPONSE 1:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas employees spent approximately 23.2 hours during the identified time period.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST**  
**(DATA REQUEST ORA-HB-SCG-2018-09)**  
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**QUESTION 2:**

How many hours have SoCalGas personnel spent on EECS advocacy activities on or after June 6, 2018?

**RESPONSE 2:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas employees spent approximately ~~10.5~~14.1 hours during the identified time period.

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**QUESTION 3:**

How many SoCalGas personnel were involved in EECS advocacy activities from June 1, 2018 to June 5, 2018?

**RESPONSE 3:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas had 1 employee spend time on such activities. When D.18-05-041 was issued, SoCalGas only had one employee who spent a portion of their time on energy efficiency statewide and federal codes and standards advocacy. Although other SoCalGas employees may have spent very minimal time (usually less than five minutes), on activities related to transitioning off of energy efficiency funded EECS, they were not “advocacy activities” and were de minimis.

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**QUESTION 4:**

How many SoCalGas personnel have been involved in EECS advocacy activities on or after June 6, 2018?

**RESPONSE 4:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas has 1 employee who spent time on such activities. When D.18-05-041 was issued, SoCalGas only had one employee who spent a portion of their time to energy efficiency statewide and federal codes and standards advocacy. Although other SoCalGas employees may have spent very minimal time (usually less than five minutes), on activities related to transitioning off of energy efficiency funded EECS, they were not “advocacy activities” and were de minimis.

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**QUESTION 5:**

Please describe the areas (subject matter and goals) in which SoCalGas performed work on EECS advocacy from June 1, 2018 to June 5, 2018.

**RESPONSE 5:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement.

1. SoCalGas was on a call with the other IOUs regarding dedicated purpose pool pump standards (an electric standard). SoCalGas did not provide any feedback or comments to the IOUs or otherwise on the standards.
2. SoCalGas communicated with representatives from the Los Angeles Department of Water and Power (LADWP) regarding the contract whereby LADWP pays for statewide lighting codes & standards efforts. It was explained to LADWP that PG&E will lead this particular statewide activity going forward.
3. SoCalGas was on a call with the other IOUs and the CEC to discuss a petition received by the DOE on residential dishwasher standards. This was a federal activity.

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**QUESTION 6:**

Please describe the areas (subject matter and goals) in which SoCalGas has performed work on EECS advocacy on or after June 6, 2018.

**RESPONSE 6:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement.

1. SoCalGas was involved in an IOU conference call discussing the implementation of the 2019 Title 24 standards. The IOUs pooled resources from each utility to consider using internally for training (thereby saving potential consultant costs for training and implementation). This was an informational meeting.
2. SoCalGas was on a call with the other IOUs regarding the one-page review form outlining comments to the petition received by the DOE on residential dishwasher standards. SoCalGas reviewed the letter. This was a federal activity.
3. SoCalGas provided comments on a draft Hearth Products CASE report as a follow-up to a previous request.
4. SoCalGas communicated with representatives from the LADWP regarding the contract whereby LADWP pays for statewide lighting codes & standards efforts. It was explained to LADWP that PG&E will lead this particular statewide activity going forward.
5. Email indicating that SoCalGas would sign on to DOE comment letter on residential dishwasher standards. This was a federal activity. It took a de minimis amount of time as this was part of an ongoing project and SoCalGas was already familiar with the contents of the letter.
6. SoCalGas was on a call with the other IOUs for a consultant presentation regarding ASHRAE 90.1-2004. This was an informational meeting.

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7. SoCalGas was present for, but did not participate in, a conference call with the IOUs regarding waivers published by the DOE on central air conditioners and whether to comment. This was a federal activity.
  8. SoCalGas was on a call with the other IOUs to discuss the one-page review form outlining comments to the petition for rulemaking received by the DOE on cooking top test procedures. SoCalGas reviewed the letter. This was a federal activity.
  9. SoCalGas was present for, but did not participate in, a conference call with the IOUs regarding electric standards for portable air conditioners.
  10. SoCalGas was present for, but did not participate in, a conference call with the IOUs regarding electric standards for fans.
  11. SoCalGas met with its consultant to discuss recent DOE Codes and Standards docket activity. This was a federal activity.

In addition to the above activity, SoCalGas includes information below on a handful of activities that it does not believe are called for by this Request since they do not amount to “work on EECS advocacy.” However, Cal Advocates has previously requested information on the below activities and/or SoCalGas has included information on these activities in its July 30, 2019 Response to Cal Advocates’ Motion for an Order to Show Cause Why SoCalGas Should Not be Sanctioned. SoCalGas provides the information below, even though it is not directly responsive to this Request, in an attempt to address questions Cal Advocates has raised about these activities.

1. A text message exchange between the SoCalGas Customer Program Regulatory Policy and Reporting Manager and a PG&E employee concerning SoCalGas’ disengagement from EE codes and standards advocacy. This was a transition activity which took a de minimis amount of time.
2. Communication between SoCalGas attorney and PG&E attorney to discuss SoCalGas’ nonparticipation in EE codes and standards advocacy. This was a transition activity related to federal activity which took a de minimis amount of time.
3. Email indicating to PG&E’s consultant that SoCalGas does not want to be a signatory to the comment letter on Electric Vehicles in response to U.S.

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EPA request for stakeholder input. This was a transition activity related to a federal activity which took a de minimis amount of time.

4. Email indicating to PG&E's consultant that SoCalGas does not want to be a signatory to the Natural Gas Cooktop comments. This was a transition activity related to a federal activity which took a de minimis amount of time.
5. SoCalGas told its consultant Negawatt to not attend an IEPR Commissioner Workshop on the 2018 California Energy Demand Forecast Update. This was a transition activity which took a de minimis amount of time.

In addition to the activities identified above, Cal Advocates has also previously requested information on an alleged five-minute phone call between a PG&E director and a SoCalGas director regarding the utilities' respective roles for codes and standards. As previously communicated to Cal Advocates in its Response to Public Advocates Office Data Request HB-SCG02018-13, dated January 7, 2019 (Attachment "SoCalGas employee's participation in meetings and associated costs"), SoCalGas has no evidence that this phone call occurred. This meeting was not on the calendar of SoCalGas' Director, SoCalGas has no associated emails confirming the call, and the SoCalGas Director has no recollection of this particular call. Although SoCalGas does not contest that a phone call may have occurred, it has not included it in the activities identified above since it has no evidence of the call.



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**QUESTION 7:**

Please describe the specific activities SoCalGas performed related to EECS advocacy from June 1, 2018 to June 5, 2018.

**RESPONSE 7:**

For the work described in Question 5, SoCalGas attended conference calls, and reviewed email correspondence.

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**QUESTION 8:**

Please describe the specific activities SoCalGas has performed related to EECS advocacy on or after June 6, 2018.

**RESPONSE 8:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. For the work described in Question 6, SoCalGas attended conference calls, provided comments on a draft CASE study, provided approval to statewide IOU comments submitted to the DOE on residential dishwasher standards, discussed docket activity, and reviewed documents and email correspondence.

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**QUESTION 9:**

Please provide the total Company-wide costs that SoCalGas has incurred related to EECS advocacy activities performed from June 1, 2018 to June 5, 2018. Please disaggregate the total into the following categories by the source of funding:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts
- b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources
- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources

**RESPONSE 9:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas objects to the term “related to” as vague, ambiguous, and overbroad. SoCalGas understands the term to mean direct costs that are attributed to specific work in statewide or federal energy efficiency Codes & Standards advocacy. ~~Costs such as allocated overheads are therefore excluded.~~ EECS advocacy program allocated overheads incurred on or after June 1, 2018 is a net credit balance of approximately (\$538.09); SoCalGas excludes this value in the response below and will not be crediting this value to shareholders. Subject to this objection, and the above understanding, SoCalGas incurred the following costs:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts: ~~SoCalGas has charged or expects to charge approximately \$223 to energy efficiency balancing accounts for the work done on statewide EECS during this time period. \$0~~
- b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding

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sources: **\$0**

- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources: ~~\$0~~ SoCalGas has charged or expects to charge approximately **\$541.95** to shareholder funding sources for the work done on energy efficiency funded EECS during this time period.

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**QUESTION 10:**

Please provide the total Company-wide costs that SoCalGas has incurred related to EECS advocacy activities performed on or after June 6, 2018. Please disaggregate the total into the following categories by the source of funding:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts
- b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources
- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources

**RESPONSE 10:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. SoCalGas also objects to the term “related to” as vague, ambiguous, and overbroad. SoCalGas understands the term to mean direct costs that are attributed to specific work in statewide or federal energy efficiency Codes & Standards advocacy. ~~Costs such as allocated overheads are therefore excluded.~~ EECS advocacy program allocated overheads incurred on or after June 1, 2018 is a net credit balance of approximately (\$538.09); SoCalGas excludes this value in the response below and will not be crediting this value to shareholders. Subject to this objection, and the above understanding, SoCalGas incurred the following costs:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts: ~~SoCalGas has charged or expects to charge approximately \$5178 to energy efficiency balancing accounts for the work done on statewide EECS during this time period.\$0~~
- b. Costs that SoCalGas has charged, or expects to charge, to other

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ratepayer funding sources: **\$0**

- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources: ~~\$0~~ SoCalGas has charged or expects to charge approximately **\$8,172.70** to shareholder funding sources for the work done on energy efficiency funded EECS during this time period.

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**QUESTION 11:**

Of the total from question 9(a), disaggregate these expenses into the following categories:

- d. Labor costs
- e. Employee expenses
- f. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.

**RESPONSE 11:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Subject to the objection identified in the response to question 9, SoCalGas responds as follows:

- a. Labor costs: ~~Approximately \$98~~ On September 11, 2019, SoCalGas revised the value in response to Question 9 to approximately \$541.95 which has been charged or is expected to be charged to shareholder funds. Of this total, approximately \$191.95 are labor costs.
- b. Employee expenses: ~~Approximately~~ \$0
- c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.
  - i. ~~Approximately \$125 (Negawatt Consulting)~~ On September 11, 2019, SoCalGas revised the value in response to Question 9 to approximately \$541.95 which has been charged or is expected to be charged to shareholder funds. Of this total, \$350.00 are attributed to consultant costs (Negawatt consulting).

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**QUESTION 12:**

Of the total from question 10(a), disaggregate these expenses into the following categories:

- a. Labor costs
- b. Employee expenses
- c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.

**RESPONSE 12:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Subject to the objection identified in the response to question 10, SoCalGas responds as follows:

- a. Labor costs: ~~Approximately \$516~~ On September 11, 2019, SoCalGas revised the values in response to Question 10 to \$8,172.70 which has been charged or is expected to be charged to shareholder funds. Of this total, approximately \$916.45 are labor costs to shareholder funds.
- b. Employee expenses: ~~Approximately \$0~~
- c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.
  - ii. ~~Approximately \$4,662 (Negawatt Consulting)~~ On September 11, 2019, SoCalGas revised the value in response to Question 10 to \$8,172.70 which has been charged or is expected to be charged to shareholder funds. Of this total, \$7,256.25 are attributed to consultant costs (Negawatt consulting).



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**QUESTION 13:**

Please provide any and all final or draft work products of EECS advocacy activities performed from June 1, 2018 through June 5, 2018. This should include documents that were written, partially written, revised, finalized, or sent on the days in question. Work products include, but are not limited to:

- a. Letters, comments, and testimony submitted to regulatory agencies
- b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
- c. Fliers, articles, and press releases
- d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.

**RESPONSE 13:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. ~~However, SoCalGas is also providing responsive documents relating to federal DOE advocacy.~~ See documents provided with SoCalGas' original responses ~~concurrently herewith,~~ in Attachment A.

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**QUESTION 14:**

Please provide any and all final or draft work products of EECS advocacy activities performed on or after June 6, 2018. This should include documents that were written, partially written, revised, finalized, or sent on or after June 6, 2018. Work products include, but are not limited to:

- a. Letters, comments, and testimony submitted to regulatory agencies
- b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
- c. Fliers, articles, and press releases
- d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.

**RESPONSE 14:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. ~~However, SoCalGas is also providing responsive documents relating to federal DOE advocacy.~~ See documents provided with SoCalGas' original responses concurrently herewith, in Attachment B.

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**QUESTION 15:**

Please provide any written or electronic correspondence with other investor-owned utilities in California regarding EECS advocacy that was sent or received on or after June 1, 2018.

**RESPONSE 15:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. ~~However, SoCalGas is also providing responsive documents relating to federal DOE advocacy.~~ See documents provided with SoCalGas' original responses concurrently herewith, in Attachment C.

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**ENERGY EFFICIENCY**  
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**QUESTION 16:**

Please provide information about any phone conversations or in-person meetings with other investor-owned utilities in California that were related to EECS advocacy, and occurred on or after June 1, 2018.

- a. Date and time
- b. Name and title of all people involved
- c. Subject matter and purpose of the meeting

**RESPONSE 16:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. ~~However, SoCalGas is also providing responsive documents relating to federal DOE advocacy.~~ See documents provided with SoCalGas' original responses ~~concurrently herewith,~~ in Attachment D.

In addition to the documents provided in Attachment D, SoCalGas includes information below on a handful of activities that Cal Advocates has previously requested information on and/or SoCalGas has included information on in its July 30, 2019 Response to Cal Advocates' Motion for an Order to Show Cause Why SoCalGas Should Not be Sanctioned. SoCalGas provides the information below in an attempt to address questions Cal Advocates has raised about these activities.

1. A text message exchange between the SoCalGas Customer Program Regulatory Policy and Reporting Manager and a PG&E employee concerning SoCalGas' disengagement from EE codes and standards advocacy. This was a transition activity which took a de minimis amount of time.
2. Communication between SoCalGas attorney and PG&E attorney to discuss SoCalGas' nonparticipation in EE codes and standards advocacy. This was a transition activity related to a federal activity which took a de minimis amount of time.

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In addition to the above, Cal Advocates' has also previously requested information on an alleged five-minute phone call between a PG&E director and a SoCalGas director regarding the utilities' respective roles for codes and standards. As previously communicated to Cal Advocates in its Response to Public Advocates Office Data Request HB-SCG02018-13, dated January 7, 2019 (Attachment "SoCalGas employee's participation in meetings and associated costs"), SoCalGas has no evidence that this phone call occurred. This meeting was not on the calendar of SoCalGas' Director, SoCalGas has no associated emails confirming the call, and the SoCalGas Director has no recollection of this particular call. Although SoCalGas does not contest that a phone call may have occurred, it has not included it in the activities identified above since it has no evidence of the call.

SoCalGas' Response to ORA-EF-SCG-2018-01  
(August 2, 2018)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**APPLIANCE STANDARDS & RULEMAKING FEDERAL ADVISORY COMMITTEE**  
**(ASRAC)**

**(DATA REQUEST ORA-EF-SCG-2018-01)**

**Date Received: July 19, 2018**

**Date Submitted: August 2, 2018**

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**QUESTION 1:**

Does a SoCalGas representative continue to hold a seat on the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC)?

**RESPONSE 1:**

Yes.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**APPLIANCE STANDARDS & RULEMAKING FEDERAL ADVISORY COMMITTEE**  
**(ASRAC)**

**(DATA REQUEST ORA-EF-SCG-2018-01)**

**Date Received: July 19, 2018**

**Date Submitted: August 2, 2018**

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**QUESTION 2:**

If SoCalGas no longer occupies a seat on ASRAC, on what date did SoCalGas' representative vacate the ASRAC seat? Please provide documentation showing the date that SoCalGas has vacated its ASRAC seat.

**RESPONSE 2:**

N/A



**SOUTHERN CALIFORNIA GAS COMPANY**

**APPLIANCE STANDARDS & RULEMAKING FEDERAL ADVISORY COMMITTEE  
(ASRAC)**

**(DATA REQUEST ORA-EF-SCG-2018-01)**

**Date Received: July 19, 2018**

**Date Submitted: August 2, 2018**

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**QUESTION 3:**

If SoCalGas continues to occupy a seat on ASRAC, has SoCalGas made a formal request that another utility replace it as the California utility representative on ASRAC?

**RESPONSE 3:**

No. The ASRAC does not maintain a seat for a California utility representative, nor was the nomination of Ms. Sim made for the purpose of representing the California utilities. Nominations to the committee are for an individual, for a 2-year term. Michelle Sim's nomination was supported by letters from Southern California Edison, San Diego Gas & Electric, One Gas, NW Natural, and the American Public Gas Association. Her term expires December 2018.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**APPLIANCE STANDARDS & RULEMAKING FEDERAL ADVISORY COMMITTEE**  
**(ASRAC)**

**(DATA REQUEST ORA-EF-SCG-2018-01)**

**Date Received: July 19, 2018**

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**QUESTION 4:**

If SoCalGas has requested that another utility take over as the California utility representative on ASRAC, on what date did SoCalGas make the request? Please provide documentation showing the date that SoCalGas requested that another utility replace it as the California utility ASRAC representative.

**RESPONSE 4:**

N/A

SoCalGas' Amended Response to  
CAL-ADVOCATES-HB-SCG-2018-13  
(September 11, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS PROGRAM**  
**(DATA REQUEST CAL-ADVOCATES-HB-SCG-2018-13)**

**Initial Response Date: 12-28-2018**  
**Updated Response Date: 01-07-2019**  
**Amended Response Date: 09-11-2019**

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**SoCalGas Preliminary Statement**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas generally objects to the defined term “related to” as vague, ambiguous, and overbroad, and to the extent it calls for irrelevant information. For the purposes of these responses, unless otherwise specified, SoCalGas omits time, work, personnel, costs, etc. for items such as overhead or generally allocated items. ~~SoCalGas objects to the phrase “energy efficiency codes and standards (EECS) advocacy” as defined as vague and ambiguous and misleading as phrased.<sup>1</sup> However, in the interest of responding in good faith, SoCalGas has endeavored to provide responses consistent with the definition provided.~~

For the purposes of these responses, SoCalGas understands the phrase “energy efficiency codes and standards advocacy” to mean conduct directly concerning statewide energy efficiency codes & standards advocacy, as delineated in Decision 18- 05-041. The activities therefore do not include activities for local programs, such as compliance and reach codes. (See Decision (D.) 18-05-041 at 12, 91; SoCalGas Business Plan at 298, PG&E Business Plan at 548, Southern California Edison Business Plan at 224.) When D. 18-05-041 was first issued, SoCalGas reasonably interpreted the decision as not prohibiting federal advocacy activities given the decision’s approval of SoCalGas’, PG&E’s, and SCE’s Business Plans, which proposed to establish a federal level of EE codes and standards subprogram that would be *administered locally rather than statewide*. Within about two months after the decision, and after a meeting with representatives from Energy Division, SoCalGas determined that in an abundance of caution it would not participate in EE federal codes and standards advocacy in addition to EE statewide codes and standards advocacy. While SoCalGas continues to believe that it is unclear whether D.18-05-041 covers federal advocacy activities, it has decided to take a cautious approach until there is further clarity provided by the Commission on the issue. Further, although SoCalGas’ original responses were served on January 7, 2019, SoCalGas has interpreted any requests that are open ended (i.e. “since June 30, 2018”), as applying up to the date the amended responses are served.

SoCalGas’ responses do not include information on activities related to energy efficiency

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<sup>1</sup>~~For example, the defined term appears to go beyond “statewide energy efficiency codes & standards advocacy,” as delineated in Decision (D.) 18-05-041, which appears to be the basis of Cal. Advocates’ requests. The activities therefore do not include activities for local programs, such as compliance, reach codes, and engagement with the Department of Energy. See D.18-05-041 at 12, 91; SoCalGas Business Plan at 298, PG&E Business Plan at 548, Southern California Edison Business Plan at 224.~~

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS PROGRAM**

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codes and standards advocacy that do not have or have not had energy efficiency funding unless Cal Advocates has identified a specific non energy efficiency funded activity in its request that it is seeking information on. Such activities are outside the scope of D.18-05-041's prohibition of SoCalGas engaging in energy efficiency codes and standards advocacy. (See D.18-05-041, p. 144 ["As the scope of this proceeding is limited to consideration of the 2018 – 2025 business plans...."]; *Id.* at 143 ["We do find, however, our initial authorization of *energy efficiency funding* for codes and standards advocacy makes clear our intent for *those funds*. . .]; see also D. 13-12-043, pp. 9, 13, 15 [cost allocations out of scope where they were being reviewed in another proceeding]; D.03-10-086, pp. 41, 48 [where funding not included in scope, it should be considered in other proceeding].)

In addition, many of the requests concern calls, conversations, and meetings from over six months ago which were not necessarily memorialized, or memorialized in detail. These responses are therefore provided based on our recollection and a reasonable, good faith inquiry. Where specific information is provided (such as amounts of time spent), the specificity should not be construed as certainty, as we have provided approximate information to the best of our knowledge in many instances.

**QUESTION 1:**

In Tab A of the attached spreadsheet, please state how much time SoCalGas spent on each of the documents listed above, in the period June 6 to 29, 2018 and what funding source paid for that time.

- a) Please state the total amount of time that SoCalGas employees spent working on this document.
- b) Which specific SoCalGas program(s) and subprogram(s) was the work on this document associated with?
- c) Of the hours that SoCalGas employees spent working on this document, please state how many hours were charged to each of the following funding sources: EE balancing accounts, other ratepayer funding sources, and shareholder funds.
- d) Please state the total amount of time that contractors spent working on this document on behalf of SoCalGas.
- e) Of the hours that contractors for SoCalGas spent working on this document, please state how many hours were charged to each of the following funding sources: EE balancing accounts, other ratepayer funding sources, and shareholder funds.

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**RESPONSE 1:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab A should be considered approximate.

**SOUTHERN CALIFORNIA GAS COMPANY  
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**QUESTION 2:**

In Tab B of the attached spreadsheet, please state how much time SoCalGas spent on each of the documents listed above, in the period June 30 to December 10, 2018 and what funding source paid for that time.

- a) Please state the total amount of time that SoCalGas employees spent working on this document.
- b) Which specific SoCalGas program(s) and subprogram(s) was the work on this document associated with?
- c) Of the hours that SoCalGas employees spent working on this document, please state how many hours were charged to each of the following funding sources: EE balancing accounts, other ratepayer funding sources, and shareholder funds.
- d) Please state the total amount of time that contractors spent working on this document on behalf of SoCalGas.
- e) Of the hours that contractors for SoCalGas spent working on this document, please state how many hours were charged to each of the following funding sources: EE balancing accounts, other ratepayer funding sources, and shareholder funds.

**RESPONSE 2:**

Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab B should be considered approximate.

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**QUESTION 3:**

Tab C of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document:

**CAIOUTechnicalMemoReproducibility\_Draft3.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 3:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab C should be considered approximate.



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**QUESTION 4:**

In Tab D of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Commercial Dryer Reproc Memo CEC 6-22-18.pdf**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 4:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

**SoCalGas incorporates the preliminary statement.** Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information

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identified in response to Tab D should be considered approximate.

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**QUESTION 5:**

In Tab E of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Cooking Top Test Procedures Petition - One Page Review Form.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that charged any of his or her time spent on this document (in the period June 6 to 29, and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 5:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab E should be considered approximate.

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**QUESTION 6:**

In Tab F of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Dishwasher Draft CASE Report.pdf**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 6:**

**The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.**

**SoCalGas incorporates the preliminary statement.** Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab F should be considered approximate.

**SOUTHERN CALIFORNIA GAS COMPANY  
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**QUESTION 7:**

In Tab G of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Draft T20 CASE Report Hearth Products\_20180531\_20180607\_SoCalGas.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 7:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

**SoCalGas incorporates the preliminary statement.** Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab G should be considered approximate.

**SOUTHERN CALIFORNIA GAS COMPANY  
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**QUESTION 8:**

In Tab H of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Fans and Blowers Draft CASE Report.pdf**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 8:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab H should be considered approximate.

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**QUESTION 9:**

In Tab I of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **T20 CASE Report Fans and Blowers Addendum v0.8.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 9:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab I should be considered approximate.

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**QUESTION 10:**

In Tab J of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **CS Attribution Study Draft Research Plan V2.docx** or **CS Attribution Study Draft Research Plan V2\_ct\_In.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 10:**

Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab J should be considered approximate.



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**QUESTION 11:**

In Tab K of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **060718\_2022-Nonres-SOW RM.docx**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 11:**

**The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.**

**SoCalGas incorporates the preliminary statement.** Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab K should be considered approximate.

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**QUESTION 12:**

In Tab L of the attached spreadsheet, please identify each SoCalGas employee (including name and title) and each SoCalGas contractor who worked on this document: **Res**

**Dishwasher\_Comment Letter\_Final**

- a) For each employee or contractor who worked on this document, list the amount of time that the employee spent on the document in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- b) For contractors who worked on this document for SoCalGas, please identify their employer or firm.
- c) For each employee or contractor who worked on this document, please describe the specific activities or actions that he or she performed in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018.
- d) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to EE balancing accounts.
- e) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to ratepayer funding sources other than EE balancing accounts.
- f) For each employee or contractor who worked on this document, state whether that employee charged any of his or her time spent on this document (in the period June 6 to 29, 2018 and in the period June 30 to December 10, 2018) to shareholder funds.

**RESPONSE 12:**

**The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.**

**SoCalGas incorporates the preliminary statement.** Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab L should be considered approximate.

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**QUESTION 13:**

On June 21, 2018, SoCalGas, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company filed a comment letter with the U.S. Department of Energy (DOE) regarding dishwasher product categories. Who made the decision that SoCalGas should sign this comment letter?

**RESPONSE 13:**

SoCalGas objects to the phrase “Who made the decision” as vague and ambiguous. Subject to the foregoing objection, SoCalGas responds as follows: Darren Hanway, Energy Efficiency Programs Operations Manager.

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**QUESTION 14:**

On June 22, 2018, Ray Mendoza communicated to Leslie Nelson of Energy Solutions that SoCalGas would sign a comment letter to DOE on a petition for rulemaking regarding the cooking top test procedure. Who made the decision that SoCalGas should sign this comment letter?

**RESPONSE 14:**

SoCalGas objects to the phrase “Who made the decision” as vague and ambiguous. Subject to the foregoing objection, SoCalGas responds as follows: Darren Hanway, Energy Efficiency Programs Operations Manager.

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**QUESTION 15:**

On June 25, 2018, Ray Mendoza communicated to Leslie Nelson of Energy Solutions that SoCalGas would remove its name from the DOE comment letter on a petition for rulemaking regarding the cooking top test procedure. Who made the decision to remove SoCalGas' signature from this comment letter?

**RESPONSE 15:**

SoCalGas objects to the phrase "Who made the decision" as vague and ambiguous. Subject to the foregoing objection, SoCalGas responds as follows: Darren Hanway, Energy Efficiency Programs Operations Manager.

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**QUESTION 16:**

Please complete Tab M of the attached spreadsheet by providing information on Company employees' participation in the listed meetings and the associated costs. For each meeting identified in Tab M of the spreadsheet, please provide the following information:

- a) Duration of the meeting
- b) The specific SoCalGas program(s) and subprogram(s) with which the meeting was associated.
- c) The names and titles of all SoCalGas employees who participated.
- d) In preparation for this meeting, did the participating SoCalGas employees discuss or confer with any other SoCalGas personnel or contractors? If so, please identify all persons involved.
- e) The number of hours that participating SoCalGas employees spent preparing for the meeting.
- f) The number of hours that participating SoCalGas employees spent in the meeting.
- g) The number of hours that participating SoCalGas employees spent on follow-up actions related to the meeting.
- h) The total number of hours that participating SoCalGas employees spent on the meeting (the sum of the previous three items).
- i) Of the total hours that participating SoCalGas employees spent on the meeting, how many hours were charged to EE balancing accounts?
- j) Of the total hours that participating SoCalGas employees spent on the meeting, how many hours were charged to other ratepayer funding sources?
- k) Of the total hours that participating SoCalGas employees spent on the meeting, how many hours were charged to shareholder funds?
- l) Total dollar amount of expenses (e.g. travel, mileage, food) that SoCalGas incurred due to Company employees' participation in this meeting.
- m) Of the expenses that SoCalGas incurred due to Company employees' participation in this meeting, how much was charged to EE balancing accounts?

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**(DATA REQUEST CAL-ADVOCATES-HB-SCG-2018-13)**

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- 
- n) Of the expenses that SoCalGas incurred due to Company employees' participation in this meeting, how much was charged to other ratepayer funding sources?
  - o) Of the expenses that SoCalGas incurred due to Company employees' participation in this meeting, how much was charged to shareholder funds?
  - p) The total costs associated with Company employees participation in this meeting that SoCalGas charged to EE balancing accounts.
  - q) The total costs associated with Company employees participation in this meeting that SoCalGas charged to other shareholder funding sources.
  - r) The total costs associated with Company employees participation in this meeting that SoCalGas charged to shareholder funds

**RESPONSE 16:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab M should be considered approximate. SoCalGas cannot provide exact total costs because SoCalGas does not track costs by individual meetings. Total costs associated with Company employees' participation in meetings are estimates based on Column I and the individual identified in Column C. SoCalGas has added a final column to include specific notes related to the identified documents.

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**QUESTION 17:**

Please complete Tab N of the attached spreadsheet by providing information on SoCalGas contractors' participation in the listed meetings and the associated costs. For each meeting identified in Tab N of the spreadsheet, please provide the following information:

- a) Duration of the meeting
- b) The specific SoCalGas program(s) and subprogram(s) with which the meeting was associated.
- c) The names, titles, and employers of all SoCalGas contractors who participated.
- d) The total dollar amount that SoCalGas contractors charged to SoCalGas for work related to this meeting, including preparation, participation, and follow-up activities.
- e) Of the amount that SoCalGas contractors charged to the Company for work related to this meeting, the amount that SoCalGas charged to EE balancing accounts.
- f) Of the amount that SoCalGas contractors charged to the Company for work related to this meeting, the amount that SoCalGas charged to other ratepayer funding sources.
- g) Of the amount that SoCalGas contractors charged to the Company for work related to this meeting, the amount that SoCalGas charged to shareholder funds.

**RESPONSE 17:**

The responses in the attachment were amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement. Please refer to the attached excel file for SoCalGas' response. As noted in the Preliminary Statement, the specific information identified in response to Tab N should be considered approximate.



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**QUESTION 18:**

Does Michelle Sim continue to hold a seat on the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC)?

- a. If Michelle Sim no longer holds a seat on ASRAC, when did she cease to hold this seat?

**RESPONSE 18:**

Yes, Michelle Sim continues to hold a seat on ASRAC.<sup>2</sup>

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<sup>2</sup> SoCalGas' responses to Public Advocates Office Data Request No. CalAdvocates-HB-SCG-2019-10 provide additional information regarding Ms. Sim's participation on ASRAC in the time since the original submission date of this response.

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**QUESTION 19:**

Does (or did) Michelle Sim participate in ASRAC as a representative of SoCalGas?

**RESPONSE 19:**

SoCalGas objects to the term “representative” as vague and ambiguous. Subject to the foregoing objection, SoCalGas responds as follows: Michelle Sim, an employee of SoCalGas, participated in ASRAC as an individual representative to provide her subject matter expertise to ASRAC.

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**QUESTION 20:**

How many hours of Company time did Michelle Sim spend on activities related to her participation in ASRAC, in the period June 6 – December 10, 2018?

- a. Of the working hours that Michelle Sim spent participating in ASRAC or related activities (including preparation for ASRAC meetings), please state how many hours were charged to each of the following funding sources: EE balancing accounts, other ratepayer funding sources, and shareholder funds.

**RESPONSE 20:**

Michelle Sim spent a total of 0.5 hours on activities related to her participation in ASRAC. The total of 0.5 hours was funded out of other ratepayer funds.

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**QUESTION 21:**

Since June 6, 2018, has Michelle Sim participated in any of the ASRAC working groups identified on the US DOE website (<https://www.energy.gov/eere/buildings/appliance-standards-and-rulemaking-federal-advisory-committee>)? If so, please identify each working group in which she has participated since June 6, 2018.

**RESPONSE 21:**

No.

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**QUESTION 22:**

Please state the total dollar value of expenses that SoCalGas incurred, in the period June 6 – December 10, 2018, as a result of Michelle Sim’s participation in ASRAC.

- a. Please identify which account(s) these expenses were charged to. If expenses were charged to more than one account during the time period in question, identify each account and the total amount charged to each account.

**RESPONSE 22:**

SoCalGas has incurred \$0 of expenses as a result of Michelle Sim’s participation in ASRAC.

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**QUESTION 23:**

Did SoCalGas incur any other costs, not identified above, associated with Michelle Sim's participation in ASRAC? If so, please provide the total amount of such costs.

**RESPONSE 23:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~No.~~ SoCalGas incorporates the preliminary statement. SoCalGas incurred approximately \$34.13 of labor costs associated with Michelle Sim's participation in ASRAC. These costs were charged to an account funded by ratepayers through the General Rate Case.

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**QUESTION 24:**

How many hours have SoCalGas personnel spent on EECS advocacy activities since June 30, 2018?

**RESPONSE 24:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~Zero.~~ SoCalGas incorporates the preliminary statement. SoCalGas employees have spent zero hours on EECS advocacy activities since June 30, 2018. Minimal program management activities (amounting to less than 5 minutes of time) were conducted directing SoCalGas' consultants to discontinue work on EECS activities. SoCalGas' consultant Negawatt monitored docket activity related to Statewide and Federal EE codes and standards through July 10, 2018, amounting to 6 hours.

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**QUESTION 25:**

How many SoCalGas personnel have been involved in EECS advocacy since June 30, 2018?

**RESPONSE 25:**

SoCalGas objects to the phrase “involved in” as vague and ambiguous. Subject to the foregoing objection, SoCalGas responds as follows:

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~Zero.~~ SoCalGas incorporates the preliminary statement. No SoCalGas employees have been involved in EECS advocacy activities since June 30, 2018. Minimal program management activities (amounting to less than 5 minutes of time) were conducted directing SoCalGas’ consultants to discontinue work on EECS activities. SoCalGas’ consultant Negawatt monitored docket activity related to Statewide and Federal EE codes and standards through July 10, 2018.



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**QUESTION 26:**

Please describe the areas (subject matter and goals) in which SoCalGas has performed work on EECS advocacy since June 30, 2018.

**RESPONSE 26:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~Not applicable~~ SoCalGas incorporates the preliminary statement. SoCalGas' consultant Negawatt monitored docket activity related to Statewide and Federal EE codes and standards through July 10, 2018.

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**QUESTION 27:**

Please describe the specific activities SoCalGas has performed related to EECS advocacy since June 30, 2018.

**RESPONSE 27:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~Not applicable~~ SoCalGas incorporates the preliminary statement. Please see the response to Question 26.

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**QUESTION 28:**

Please provide the total Company-wide costs that SoCalGas has incurred related to EECS advocacy activities performed since June 30, 2018. Please disaggregate the total into the following categories by the source of funding:

- a) Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts
- b) Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources
- c) Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources

**RESPONSE 28:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

SoCalGas incorporates the preliminary statement.

- a) Zero.
- b) Zero.
- c) ~~Zero~~ \$1,118.75, this amount includes costs associated with activities done on or after June 30, 2018. Please see the response to Question 26.

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**QUESTION 29:**

Please provide any and all *final* or *draft* work products of EECS advocacy activities performed since June 30, 2018. This should include documents that were written, partially written, revised, finalized, or sent since June 30, 2018. Work products include, but are not limited to:

- a) Letters, comments, and testimony submitted to regulatory agencies
- b) Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
- c) Fliers, articles, and press releases
- d) Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.

**RESPONSE 29:**

- a) Not applicable.
- b) Not applicable.
- c) Not applicable.
- d) Not applicable.

Document	Total time that SoCalGas employees spent working on the document in the period June 6-29, 2018	Which specific SoCalGas program(s) and subprogram(s) was this work associated with?	Of the hours in column B, number of hours charged to EE balancing accounts	Of the hours in column B, number of hours charged to other ratepayer funding sources	Of the hours in column B, number of hours charged to shareholder funds	Total time that SoCalGas contractors spent working on the document in the period June 6-29, 2018	Of the hours in column G, number of hours charged to EE balancing accounts	Of the hours in column G, number of hours charged to other ratepayer funding sources	Of the hours in column G, number of hours charged to shareholder funds
CAIOUTechnicalMemoReproducibility_Draft3.docx	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	0	0	0	0
Commercial Dryer Reproc Memo CEC 6-22-18.pdf	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	0	0	0	0
Cooking Top Test Procedures Petition - One Page Review Form.docx	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	5 0.08	0.08	0	0.08
Dishwasher Draft CASE Report.pdf	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	2.5	2.5	0	2.5
Draft T20 CASE Report Hearth Products_20180531_20180607_SoCalGas.docx	10 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.16	0	0.16	4.5	4.5	0	4.5
Fans and Blowers Draft CASE Report.pdf	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	0	0	0	0
T20 CASE Report Fans and Blowers Addendum v0.8.docx	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	0	0	0	0
CS Attribution Study Draft Research Plan V2.docx or CS Attribution Study Draft Research Plan V2_ct_In.docx*	60 minutes	SCG 3772 - EM&V - Evaluation Measurement & Verification	1	0	0	1.5	0.2202	0	0
060718_2022-Nonres-SOW RM.docx	15 minutes	SCG 3724 - C&S SW - Buiding Codes & Compliance Advocacy	0.25	0	0.25	0	0	0	0
Res Dishwasher_Comment Letter_Final	5 minutes	SCG 3725 - C&S SW - Appliance Standards Advocacy	0.08	0	0.08	0	0	0	0
			1.97		0.97		0.2202		7.08

\*note: Consultant fees for this EM&V work are split between PG&E, SDG&E, and SoCalGas. The consultant billed 1.5 hours of time for this EM&V task, which SoCalGas pays 14.68% share.

Document	Total time that SoCalGas employees spent working on the document in the period June 30 - December 10, 2018	Which specific SoCalGas program(s) and subprogram(s) was this work associated with?	Of the hours in column B, number of hours charged to EE balancing accounts	Of the hours in column B, number of hours charged to other ratepayer funding sources	Of the hours in column B, number of hours charged to shareholder funds	Total time that SoCalGas contractors spent working on the document in the period June 30 - December 10, 2018	Of the hours in column G, number of hours charged to EE balancing accounts	Of the hours in column G, number of hours charged to other ratepayer funding sources	Of the hours in column G, number of hours charged to shareholder funds
CAIOUTechnicalMemoReproducibility_Draft3.docx	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
Commercial Dryer Reproc Memo CEC 6-22-18.pdf	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
Cooking Top Test Procedures Petition - One Page Review Form.docx	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
Dishwasher Draft CASE Report.pdf	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
Draft T20 CASE Report Hearth Products_20180531_20180607_SoCalGas.docx	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
Fans and Blowers Draft CASE Report.pdf	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
T20 CASE Report Fans and Blowers Addendum v0.8.docx	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
CS Attribution Study Draft Research Plan V2.docx or CS Attribution Study Draft Research Plan V2_ct_In.docx	0	SCG 3772 - EM&V - Evaluation Measurement & Verification	0	0	0	0	0	0	0
060718_2022-Nonres-SOW RM.docx	0	SCG 3724 - C&S SW - Buiding Codes & Compliance Advocacy	0	0	0	0	0	0	0
Res Dishwasher_Comment Letter_Final	0	SCG 3725 - C&S SW - Appliance Standards Advocacy	0	0	0	0	0	0	0
			0	0	0	0	0	0	0

Work product: CAIOUTechnicalMemoReproducibility\_Draft3.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged to time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged to time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed document	<del>Y</del> N	N	<del>Y</del> N	0	None	N	N	N

Work product: Commercial Dryer Reproc Memo CEC 6-22-18.pdf

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed Memo	YN	N	NY	0	None	N	N	N



Work product: Cooking Top Test Procedures Petition - One Page Review Form.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed petition	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N
Bo White	Senior Project Engineer	Contractor	Negawatt	5 minutes	Reviewed petition	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N

Work product: Dishwasher Draft CASE Report.pdf

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed report	<del>Y</del> N	N	<del>Y</del>	0	None	N	N	N
Bo White	Senior Project Engineer	Contractor	Negawatt	2.5 Hours	Reviewed report and suggested comments	<del>Y</del> N	N	<del>Y</del>	0	None	N	N	N

Work product: Draft T20 CASE Report Hearth Products\_20180531\_20180607\_SoCalGas.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018			Work performed June 30-December 10, 2018						
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	10 minutes	Reviewed document	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N
Bo White	Senior Project Engineer	Contractor	Negawatt	4.5 Hours	Reviewed document, suggested comments	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N

Work product: Fans and Blowers Draft CASE Report.pdf

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed report	<del>Y</del> N	N	<del>Y</del>	0	None	N	N	N

Work product: T20 CASE Report Fans and Blowers Addendum v0.8.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed document	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N

Work product: CS Attribution Study Draft Research Plan V2.docx  
or CS Attribution Study Draft Research Plan V2\_ct\_In.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Loan Nguyen	EM&V Supervisor	SoCalGas employee		1	reviewed document	Yes	No	No	0	N/A	No	No	No
Craig Tyler	Consultant	Contractor	Tyler & Associates	1.5	reviewed document, attended C&S call	Yes	No	No	0	N/A	No	No	No

Work product: 060718\_2022-Nonres-SOW RM.docx

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this	Specific actions this person performed on	Were any of the hours in Column E charged	Were any of the hours in Column E charged to	Were any of the hours in Column E	Number of hours this	Specific actions this person performed	Were any of the hours in Column J charged	Were any of the hours in Column J charged to	Were any of the hours in Column J charged to
Ray Mendoza	Program Advisor	SoCalGas employee	NA	15 minutes	Reviewed document	<del>Y</del> N	N	<del>N</del> Y	0	None	N	N	N

Work product: Res Dishwasher\_Comment Letter\_Final

Name	Title	SoCalGas employee or contractor?	Employing firm (for contractors)	Work performed June 6-29, 2018					Work performed June 30-December 10, 2018				
				Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column E charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column E charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column E charged to shareholder funds? (Yes/No)	Number of hours this person spent on this work product	Specific actions this person performed on this work product	Were any of the hours in Column J charged time EE balancing accounts? (Yes/No)	Were any of the hours in Column J charged to other ratepayer funding sources? (Yes/No)	Were any of the hours in Column J charged to shareholder funds? (Yes/No)
Ray Mendoza	Program Advisor	SoCalGas employee	NA	5 minutes	Reviewed letter	YN	N	NY	0	None	N	N	N



SoCalGas employees' participation in meetings and associated costs

				(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	
Meeting	Reference	Date	Time	Duration	Which specific SoCalGas program(s) and subprogram(s) was this meeting associated with?	Participants for SoCalGas (including employees only)	In preparation for this meeting, did the participating SoCalGas employees discuss or confer with any other SoCalGas personnel or contractors? If so, please identify all persons involved.	Number of hours that SoCalGas participants spent preparing for this meeting	Number of hours that SoCalGas participants spent in this meeting	Number of hours that SoCalGas participants spent on follow-up actions related to this meeting	Total hours that SoCalGas participants spent on this meeting (sum of Columns E, F, and G)	Of the total hours in Column H, how many hours were charged to EE balancing accounts?	Of the total hours in Column H, how many hours were charged to other ratepayer funding sources?	Of the total hours in Column H, how many hours were charged to shareholder funds?	Total dollar amount of expenses (e.g. travel, mileage, food) that SoCalGas incurred due to this meeting	Of the total expenses in Column L, how much was charged to EE balancing accounts?	Of the total expenses in Column L, how much was charged to other ratepayer funding sources?	Of the total expenses in Column L, how much was charged to shareholder funds?	Total costs associated with this meeting that were charged to EE balancing accounts	Total costs associated with this meeting that were charged to other ratepayer funding sources	Total costs associated with this meeting that were charged to shareholder funds	SoCalGas Notes
Conference Call for Comment Letter on Res Dishwasher Petition	"060718_IOU discussion collab Res Dishwasher.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/7/2018	3:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray MendozBo White, Negawaz		0.08	1 hour	0.08	1.16	<del>1.16</del> 0	0	1.16	0	0	0	0	<del>\$53.15</del> \$0	0	\$53.15	
Planning for 2019 Overview for IOU teams	"060718_IOU planning coordination 2019 T24.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/7/2018	11:05 AM	1 hour	SCG 3724 - C&S SW - Building Codes & Compliance Advocacy	Ray MendozNone		0.08	1 hour	0.08	1.16	<del>1.16</del> 0	0	1.16	0	0	0	0	<del>\$53.15</del> \$0	0	\$53.15	Please note meeting identified in Row 5 and 6 are the same.
Title 24 2019 Wrap up and 2022 Planning, Bi-weekly Building Codes Advocacy Check in call		6/7/2018	1:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray MendozNone		<del>0.08</del> 0	<del>1 hour</del> 0.08	0	1.16	<del>1.16</del> 0	0	0	0	0	0	0	<del>\$53.15</del> \$0	0	0	Please note meeting identified in Row 5 and 6 are the same. SoCalGas' C&S Program Advisor did not have this meeting in their calendar and does not recall attending or participating in this meeting.
2019 Title 24 Advocacy Support - ASHRAE 90.1 Presentation	Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/11/2018	11:00 AM	.5 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray MendozNone		0	.5 hour	0	40.5	40	0	0.5	0	0	0	0	<del>\$41.96</del> \$0	0	\$41.96	

Meeting	Reference	Date	Time	Duration	Which specific SoCalGas program(s) and subprogram(s) was this meeting associated with?	Participants for SoCalGas (including employees only)	In preparation for this meeting, did the participating SoCalGas employees discuss or confer with any other SoCalGas personnel or contractors? If so, please identify all persons involved.	Number of hours that SoCalGas participants spent preparing for this meeting	Number of hours that SoCalGas participants spent in this meeting	Number of hours that SoCalGas participants spent on follow-up actions related to this meeting	Total hours that SoCalGas participants spent on this meeting (sum of Columns E, F, and G)	Of the total hours in Column H, how many hours were charged to EE balancing accounts?	Of the total hours in Column H, how many hours were charged to shareholder funds?	Total dollar amount of expenses (e.g. travel, mileage, food) that SoCalGas incurred due to this meeting	Of the total expenses in Column L, how much was charged to EE balancing accounts?	Of the total expenses in Column L, how much was charged to other ratepayer funding sources?	Of the total expenses in Column L, how much was charged to shareholder funds?	Total costs associated with this meeting that were charged to EE balancing accounts	Total costs associated with this meeting that were charged to other ratepayer funding sources	Total costs associated with this meeting that were charged to shareholder funds	SoCalGas Notes
DOE CAC Waivers	"061818_IOU discussion collab CAC waivers.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/18/2018	11:30 AM	.5 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray Mendez, Bo White, Negaw		0.16	.5 hour	0.16	0.82	<del>0.82</del> 0	0.82	0	0	0	0	<del>\$57.35</del> \$ 0	0	\$57.35	
Proposed Comment Letter on Cooking Top Petition	"061818_IOU discussion collab Cooking petition.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/18/2018	12:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray Mendez, Bo White, Negaw		0.08	1 hour	0.08	1.16	<del>1.16</del> 0	1.16	0	0	0	0	<del>\$53.15</del> \$ 0	0	\$53.15	
2019 Title 24 Advocacy Support - Software Coordination	Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/20/2018	8:30 AM	0 hour	SCG 3724 - C&S SW - Building Codes & Compliance Advocacy	Ray Mendez	None	0	0 hours	0	0	0	0	0	0	0	0	\$ -	0	0	This meeting was cancelled so SoCalGas did not participate.
Portable ACs Update Meeting	"062018_IOU discussion collab Portable ACs.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/20/2018	3:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Ray Mendez	None	0.08	1 hour	0.08	1.16	<del>1.16</del> 0	1.16	0	0	0	0	<del>\$53.15</del> \$ 0	0	\$53.15	
Elliott Henry phone call to discuss comments on cooktop test procedure		6/22/2018	4:00 PM	< 5m	SCG 3725 - C&S SW - Appliance Standards Advocacy*	Elliott Henry	None	0	< .1	< .1	< .2	0	< .2	0	0	0	0	0	0	0	* SoCalGas objects to this request as irrelevant and overly broad. In addition, it is particularly irrelevant and overbroad as the entirety of the call was an inquiry from another utility regarding whether SoCalGas would be joining certain comments.



Contractors' participation in meetings and associated costs											
				(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Meeting	Reference	Date	Time	Duration	Which specific SoCalGas program(s) and subprogram(s) was this meeting associated with?	Contractors participating for SoCalGas; provide each participant's name and employer	Total dollar amount that contractors charged to SoCalGas for work related to this meeting, including preparation, participation, and follow-up.	Of the amount in Column H, how much was charged to EE balancing accounts?	Of the amount in Column H, how much was charged to other ratepayer funding sources?	Of the amount in Column H, how much was charged to shareholder funds?	SoCalGas Notes
Conference Call for Comment Letter on Res Dishwasher Petition	"060718_IOU discussion collab Res Dishwasher.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/7/2018	3:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Bo White, Negawatt	375	375-0	0	375	
Planning for 2019 Overview for IOU teams	"060718_IOU planning coordination 2019 T24.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/7/2018	11:05 AM		SCG 3724 - C&S SW - Building Codes & Compliance Advocacy	None					Please note meeting identified in Row 5 and 6 are the same.
Title 24 2019 Wrap up and 2022 Planning, Bi-weekly Building Codes Advocacy Check in call		6/7/2018	1:00 PM		SCG 3725 - C&S SW - Appliance Standards Advocacy	None					Please note meeting identified in Row 5 and 6 are the same. SoCalGas' C&S Program Advisor did not have this meeting in their calendar and does not recall attending or participating in this meeting.
2019 Title 24 Advocacy Support - ASHRAE 90.1 Presentation	Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/11/2018	11:00 AM		SCG 3725 - C&S SW - Appliance Standards Advocacy	None					
DOE CAC Waivers	"061818_IOU discussion collab CAC waivers.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/18/2018	11:30 AM	5 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Bo White, Negawatt	975	975-0	0	975	
Proposed Comment Letter on Cooking Top Petition	"061818_IOU discussion collab Cooking petition.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/18/2018	12:00 PM	1 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	Bo White, Negawatt	375	375-0	0	375	
2019 Title 24 Advocacy Support - Software Coordination	Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/20/2018	8:30 AM	0 hours	SCG 3724 - C&S SW - Building Codes & Compliance Advocacy	None					This meeting was cancelled so SoCalGas did not participate.
Portable ACs Update Meeting	"062018_IOU discussion collab Portable ACs.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/20/2018	3:00 PM		SCG 3725 - C&S SW - Appliance Standards Advocacy	None					
Elliott Henry phone call to discuss comments on cooktop test procedure		6/22/2018	4:00 PM	< 5m		None					
Conference call on studies of interest to gas utilities, including building decarbonization activities through 2019		6/26/2018	9:30 AM	90 min		None					
IOU Title 20 Fans Call	"062618_IOU discussion collab Fans.pdf," Attachment D of SoCalGas response to Data Request ORA-HB-SCG-2018-09	6/26/2018	10:00 AM	5 hour	SCG 3725 - C&S SW - Appliance Standards Advocacy	None					
Dan Renler phone call to discuss SoCalGas' involvement in EE Codes & Standards		6/28/2018	3:00 PM	*		None					

SoCalGas' Amended Response to  
CAL-ADVOCATES-HB-SCG-2019-01  
(September 11, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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This data request seeks clarification of certain information about SoCalGas' involvement in energy efficiency codes and standards (EECS) advocacy. For the purposes of this data request, EECS advocacy includes any and all advocacy to *local, state, or federal* bodies that is related to appliance standards or building codes.

**QUESTION 1:**

In response to Question 20 of Public Advocates Office Data Request Cal-Advocates-HB-SCG-2018-13, which requested information about Michelle Sim's participation in the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) between June 6 and December 10, 2018, SoCalGas stated that Michelle Sims spent 0.5 hours related to her participation in ASRAC and that the total of 0.5 hours "was funded out of other ratepayer funds." Please identify to which ratepayer-funded account (or accounts) Ms. Sim charged her time dedicated to ASRAC.

**RESPONSE 1:**

Ms. Sim charged 100 percent of her time dedicated to ASRAC to O&M.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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**QUESTION 2:**

In response to Question 16 (Tab M) of Public Advocates Office Data Request Cal-Advocates-HB-SCG-2018-13, SoCalGas stated that three employees (George Minter, Allison Smith, and Tanya Peacock) participated in a June 26, 2018 conference call related to building decarbonization.

- a) SoCalGas states that employees spent 0.3 hours preparing for this meeting, 1.5 hours in the meeting, and 0.5 hours on follow-up activities. Do these amounts reflect the time spent per employee or the combined number of person-hours for the three employees?
- b) SoCalGas states that the time employees dedicated to this meeting was charged to ratepayer funds other than EE balancing accounts. Please identify which ratepayer-funded account (or accounts) this time was charged to.

**RESPONSE 2:**

- a) The following is a breakdown of time spent related to the meeting stated in question 2 above:
  - Preparation: 0.3 hours – one employee
  - Meeting: 1.5 hours – per employee (each of the three employees spent 1.5 hours on the call)
  - Follow-up: 0.5 hours – one employee
- b) All costs associated with the time spent related to the meeting stated in question 2 above was charged to the General Rate Case account.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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**QUESTION 3:**

Please describe any meetings or phone conversations, related to EECS, that SoCalGas Director Dan Rendler may have had with his managerial counterparts at other California Investor-Owned Utilities from June 20, 2018 through June 30, 2018. For each such interaction, please characterize the subject matter and purpose of the meeting and identify the date and time, duration, and participants (including name and employer).

**RESPONSE 3:**

SoCalGas objects to the term “related to” as vague, ambiguous, and overbroad. SoCalGas understands the term to refer to conversations and meetings in which work in statewide energy efficiency Codes & Standards advocacy was discussed. Subject to the foregoing objection, SoCalGas responds as follows. Dan Rendler had a standing weekly call with Lisa Davidson, his SDG&E counterpart during this time period, which was held if warranted. These calls did not have an agenda, but would have been a weekly touch base on overall department issues, such as staffing, upcoming deliverables, etc. During this period, the calls would have occurred on June 20 and/or June 27, 2018, from 11am to 11:30am. To the best of his recollection, Mr. Rendler does not recall any discussion during these calls relating to EECS.



**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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**QUESTION 4:**

In response to Question 12 of Public Advocates Office Data Request ORA-HB-SCG-2018-09, SoCalGas listed as a cost incurred by SoCalGas and charged to energy efficiency balancing accounts “approximately \$4,662 (Negawatt consulting).” Was the “approximately \$4,662” paid to Negawatt for services performed solely for SoCalGas?

**RESPONSE 4:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

The “approximately \$4,662” paid to Negawatt was for services performed solely for SoCalGas. On September 11, 2019, SoCalGas revised the value in response to Question 12 of ORA-HB-SCG-2018-09 to \$7,256.25, which has been charged to shareholder funds.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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**QUESTION 5:**

In response to questions in Public Advocates Office Data Request Cal-Advocates-HB-SCG-2013-13, SoCalGas provided a spreadsheet that included estimated amounts of time that Bo White, Senior Project Engineer, performed work that SoCalGas charged to energy efficiency balancing accounts (see Tab E, line 5; Tab F, line 5, and Tab G, line 5).

Was Mr. White's time that SoCalGas charged to energy efficiency balancing accounts, as shown in SoCalGas's excel spreadsheet submitted in response to Public Advocates Office Data Request Cal-Advocates-HB-SCG-2013-13, for services that Mr. White performed solely for SoCalGas?

**RESPONSE 5:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

Mr. White's time that SoCalGas charged to energy efficiency balancing accounts, as shown in SoCalGas' excel spreadsheet submitted in response to CalAdvocates-HB-SCG-2013-13 was for services performed solely for SoCalGas. On September 11, 2019, SoCalGas' revised excel spreadsheet submitted in response to CalAdvocates-HB-SCG-2013-13 indicated that Mr. White's time was charged to shareholder funds.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-01)**  
**DATE RECEIVED: 1/16/19**  
**DATE SUBMITTED: 1/30/19**  
**DATE AMENDED: 9/11/19**

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**QUESTION 6:**

Question 7 of Public Advocates Office Data Request No EF-SCG-2018-11-01 requested a list of all advocacy groups, trade organizations, and other membership organizations in which SoCalGas has participated since January 1, 2014, and any membership dues or donations that SoCalGas has paid to each of the groups since January 1, 2014, listed by value and date. In response to question 7, SoCal Gas provided two Excel spreadsheets that included dues paid and/or donations that SoCalGas made to the following groups:

- American Gas Association,
  - American Public Gas Association,
  - Gas Technology Institute, and
  - American Institute for an Energy Efficiency Economy.
- a) For each Excel spreadsheet line item of the dues paid and/or donations that SoCalGas made to these groups, please list the source(s) of the funding: energy efficiency funds; other ratepayer funds; or shareholder funds.
- b) If other ratepayer funds were used, please indicate the specific account.

**RESPONSE 6:**

Please see the attached excel file for SoCalGas' responses to question 6.



Question 6  
Response - CalAdvo

SoCalGas' Amended Response to  
CAL-ADVOCATES-HB-SCG-2018-03  
(September 11, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 1:**

Does SoCalGas record all energy efficiency costs in the Demand Side Management Balancing Account? If the answer is no, please list all accounts in which SoCalGas records energy efficiency expenditures.

**RESPONSE 1:**

Yes, all the energy efficiency costs are recorded in the Demand Side Management Balancing Account (DSMBA).

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 2:**

Do SoCalGas's energy efficiency balancing account entries identify the energy efficiency sub-program associated with the costs?

**RESPONSE 2:**

No, sub-programs associated with energy efficiency (EE) costs are not identified on the EE balancing account (DSMBA).

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 3:**

SoCalGas's July 16, 2018 responses to questions 9 and 10 of the Public Advocates Office Data Request ORA-HB-SCG-2018-09 (requesting the "Company-wide costs that SoCalGas has incurred related to EECS advocacy activities") stated:

SoCalGas understands the term to mean direct costs that are attributed to specific work in statewide energy efficiency Codes & Standards advocacy. Costs such as allocated overheads are therefore excluded. (emphasis added)

Please list each and every type of cost that is included within the phrase "costs such as allocated overhead."

**RESPONSE 3:**

SoCalGas objects to the phrase "related to" as defined as vague and ambiguous and overbroad. Subject to the foregoing objections, SoCalGas responds as follows: Allocated overhead costs for the Energy Efficiency Portfolio, including Codes & Standards Advocacy, are general administrative overhead activities such as general administration, accounting support, IT services and support, and regulatory support. These overhead costs are for support of the entire portfolio, which are then allocated across all programs within the portfolio using a weighted average spread.

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 4:**

For each and every cost that is included within the phrase “costs such as allocated overhead,” please explain how SoCalGas recovers those costs.

**RESPONSE 4:**

Costs considered allocated overhead for any Energy Efficiency program, including Codes and Standard Advocacy Programs, are recovered through its Public Purpose Program (PPP) Filing based on a Commission approved budget. Once the Commission approves the PPP Filing for rate recovery, these costs are recovered through the PPP surcharge line item of customers’ bills and captured in the DSMBA.



**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 5:**

Please quantify the “costs such as allocated overhead” for each of the energy efficiency costs identified in SoCalGas’s July 16, 2018 responses to the Public Advocates Office Data Request ORA-HB-SCG-2018-09 and its January 7, 2019 responses to Public Advocates Office CalAdvocates-HB-SCG-2018-13.

**RESPONSE 5:**

Response amended on September 11, 2019. Changes are noted in red and deletions are noted in red strikethrough.

~~Allocated Overhead costs charged to Codes and Standards Advocacy programs for the time periods subject in SoCalGas’s July 16, 2018 responses to the Public Advocates Office Data Request ORA-HB-SCG-2018-09 and its January 7, 2019 responses to Public Advocates Office CalAdvocates-HB-SCG-2018-13 are as follows:~~

- ~~June 1 – June 5, 2018: \$226.70~~
- ~~June 6 – June 29, 2018: \$425.32~~

EECS advocacy program allocated overheads incurred on or after June 1, 2018 is a net credit balance of approximately (\$538.09); SoCalGas will not be crediting this value to shareholders.

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019**

**DATE SUBMITTED: April 1, 2019**

**DATE AMENDED: September 11, 2019**

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**QUESTION 6:**

Please list the name and title of every person who was in Ray Mendoza's chain of command between May 31, 2018 and June 30, 2018.

**RESPONSE 6:**

Patti Wagner – CEO

Bret Lane – President and COO

Sharon Tomkins – VP Customer Solutions & Strategy

Dan Rendler – Director SCG Customer Programs and Assistance

Darren Hanway – C/I MM Segment Manager

Carlos Ruiz – Energy Programs Supervisor

Sharareh Moaddeli – Sr Customer Programs Advisor

Ray Mendoza – Customer Programs Advisor I

SoCalGas' Response to  
CAL-ADVOCATES-HB-SCG-2019-10  
(August 29, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 1:**

Does Michelle Sim continue to hold a seat on the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC)?

- a. If Michelle Sim no longer holds a seat on ASRAC, when did she cease to hold this seat?

**RESPONSE 1:**

No, Michelle Sim no longer holds a seat on ASRAC. Ms. Sim's first term expired December 2018. Ms. Sim's seat was rolled into the next term and concluded effective February 6, 2019.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 2:**

Has any other SoCalGas employee held a seat on ASRAC since June 1, 2018? If so, please provide the following information:

- a. The name and title of each employee who has held a seat on ASRAC
- b. Date when the employee began to hold this seat
- c. Date when the employee's tenure on ASRAC ended or is expected to end

**RESPONSE 2:**

No other SoCalGas employee has held a seat on ASRAC since June 1, 2018.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 3:**

State how many hours of Company time SoCalGas employees have spent on activities related to participation in ASRAC since December 10, 2018.

- a. Did SoCalGas charge any of this time to ratepayers? If so, specify each funding source (specific account and cost center) to which SoCalGas charged any portion of this time.

**RESPONSE 3:**

Ms. Sim has not spent any time on activities related to ASRAC since December 10, 2018.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 4:**

Since June 1, 2018, has any SoCalGas employee participated in any of the ASRAC working groups identified on the US DOE website (<https://www.energy.gov/eere/buildings/appliance-standards-and-rulemaking-federal-advisory-committee>)?

- a. If so, please identify each working group in which the SoCalGas employee(s) participated since June 1, 2018.

**RESPONSE 4:**

No.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 5:**

List each date on which any SoCalGas employee worked on activities related to ASRAC since June 1, 2018. For each such date, provide the following information:

- a. Name and title of each employee involved
- b. Number of working hours spent on activities related to ASRAC
- c. A brief description of the activities or actions performed.
- d. Funding source (specific account and cost center) to which SoCalGas charged the employee(s)' time, as of August 14, 2019.
- e. Documentation (including, but not limited to, executed journal entries) showing that the time was charged to the account and cost center specified.

**RESPONSE 5:**

**June 28, 2018**

- a. Name and title of each employee involved: **Michelle Sim, Clean Transportation Sales Manager.**
- b. Number of working hours spent on activities related to ASRAC: **.5 hours**
- c. A brief description of the activities or actions performed: **Ms. Sim participated in a meeting with SoCalGas' consultant regarding current rulemaking proceedings, including DOE docket activity.**
- d. Funding source (specific account and cost center) to which SoCalGas charged the employee(s)' time, as of August 14, 2019. **Clean Transportation - Business Development, Cost Center: 2220-2560, Internal Order Number FG9100002200. These accounts are funded by ratepayers through the General Rate Case.**
- e. Documentation (including, but not limited to, executed journal entries) showing that the time was charged to the account and cost center specified. **Ms. Sim spent .5 hours of her 16 hours on activities related to ASRAC, see file "Cal Advocates-HB-2019-ASRAC".**

**November 16, 2018**

- a. Name and title of each employee involved: **Michelle Sim, Clean Transportation Sales Manager.**



**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
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- b. Number of working hours spent on activities related to ASRAC: **Approximately 2 minutes.**
- c. A brief description of the activities or actions performed. **Michelle Sim sent an email on November 16, 2018 to approve a VRF working group request on an extension for their lab testing.**
- d. Funding source (specific account and cost center) to which SoCalGas charged the employee(s)' time, as of August 14, 2019. **There are no costs associated with this de minimis amount of time.**
- e. Documentation (including, but not limited to, executed journal entries) showing that the time was charged to the account and cost center specified. **N/A.**

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 6:**

Please itemize every non-labor cost that SoCalGas incurred, since June 1, 2018, as a result of employees' participation in ASRAC. For each item, please provide the following information:

- a. Expense type or purpose (e.g., "airfare" or "meal reimbursement")
- b. Vendor/supplier
- c. Date of expenditure
- d. Employee who was reimbursed for the expense, if applicable.
- e. A receipt or invoice for the transaction
- f. Funding source (specific account and cost center) to which SoCalGas charged this cost, as of August 14, 2019.
- g. Documentation (including, but not limited to, executed journal entries) showing that the cost was charged to the account and cost center specified.

**RESPONSE 6:**

No non-labor costs were incurred since June 1, 2018 as a result of Ms. Sim's participation in ASRAC.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CAL ADVOCATES-HB-SCG-2019-10)**  
**DATE RECEIVED: AUGUST 15, 2019**  
**DATE SUBMITTED: AUGUST 29, 2019**

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**QUESTION 7:**

Since June 1, 2018, did SoCalGas incur any other costs, not identified above, associated with employees' participation in ASRAC? If so, please provide the total amount of such costs.

**RESPONSE 7:**

No.

# APPENDIX B

C&S advocacy program account entries  
for the period of June 2018-November 2019  
by IO and Cost Element

Attachment 1: C&S advocacy program account entries for the period of June 2018-November 2019 by IO and Cost Element

PgmID	Pgm Name	Order	Cost Elem.	Cost element name	2018						2019					Total	
					Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr		Aug
SCG372	C&S-Building Codes & Compliance	300785801	6110020	SAL-MGMT S/T	\$ 3,100	\$ 3,069	\$ (124)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (6,045)	\$ (0)
			6130001	EMP TRVL-AIR	\$ -	\$ 88	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 88
			6130002	EMP TRVL-RAIL	\$ -	\$ 11	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11
			6130014	EMP TRVL-PARKING	\$ -	\$ 17	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17
			6130015	MEALS & TIP & ENT 50	\$ -	\$ 8	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8
			6130020	EMP TRVL-HOTEL/LODG	\$ -	\$ 225	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 225
			6220600	SRV-CONSULTING-OTHER	\$ 3,250	\$ 463	\$ -	\$ 249	\$ -	\$ -	\$ (150)	\$ 150	\$ -	\$ -	\$ 5,571	\$ (463)	\$ 9,070
			9121100	V&S L (CS)	\$ 558	\$ 552	\$ (22)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,194)	\$ (106)
			9122310	PR Tax NL (CS) SCG	\$ 278	\$ 275	\$ (11)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (550)	\$ (8)
<b>C&amp;S-Building Codes &amp; Compliance Advocacy Total</b>					<b>\$ 7,186</b>	<b>\$ 4,708</b>	<b>\$ (157)</b>	<b>\$ 249</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (150)</b>	<b>\$ 150</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 5,571</b>	<b>\$ (8,251)</b>	<b>\$ 9,305</b>
SCG372	C&S-Appliance Standards Advocac	300785805	6110020	SAL-MGMT S/T	\$ 3,100	\$ 3,069	\$ (124)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (6,045)	\$ (0)
			6130001	EMP TRVL-AIR	\$ -	\$ 88	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 88
			6130002	EMP TRVL-RAIL	\$ -	\$ 11	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11
			6130014	EMP TRVL-PARKING	\$ -	\$ 17	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17
			6130015	MEALS & TIP & ENT 50	\$ -	\$ 8	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8
			6130020	EMP TRVL-HOTEL/LODG	\$ -	\$ 225	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 225
			6220600	SRV-CONSULTING-OTHER	\$ 5,739	\$ 5,600	\$ 1,544	\$ -	\$ -	\$ 88	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (7,144)	\$ 5,826
			9121100	V&S L (CS)	\$ 558	\$ 552	\$ (22)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (1,194)	\$ (106)
			9122310	PR Tax NL (CS) SCG	\$ 278	\$ 275	\$ (11)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (550)	\$ (8)
<b>C&amp;S-Appliance Standards Advocacy Total</b>					<b>\$ 9,675</b>	<b>\$ 9,845</b>	<b>\$ 1,386</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 88</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ (14,932)</b>	<b>\$ 6,061</b>
<b>Total</b>					<b>\$ 16,860</b>	<b>\$ 14,553</b>	<b>\$ 1,229</b>	<b>\$ 249</b>	<b>\$ -</b>	<b>\$ 88</b>	<b>\$ (150)</b>	<b>\$ 150</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 5,571</b>	<b>\$ (23,184)</b>	<b>\$ 15,366</b>

Labor correction account entries to  
local C&S programs by IO and Cost Element

**Attachment 2: Labor correction account entries to local C&S programs by IO and Cost Element**

PgmID	Pgm Name	Order	Cost Elem.	Cost element name	2019-Aug	Total
SCG3726	C&S-Compliance Enhancement	300785809	6110020	SAL-MGMT S/T	\$ 3,739	\$ 3,739
			9121100	V&S L (CS)	\$ 738	\$ 738
			9122310	PR Tax NL (CS) SCG	\$ 340	\$ 340
<b>C&amp;S-Compliance Enhancement Total</b>					<b>\$ 4,818</b>	<b>\$ 4,818</b>
SCG3727	C&S-Reach Codes	300785813	6110020	SAL-MGMT S/T	\$ 3,739	\$ 3,739
			9121100	V&S L (CS)	\$ 738	\$ 738
			9122310	PR Tax NL (CS) SCG	\$ 340	\$ 340
<b>C&amp;S-Reach Codes Total</b>					<b>\$ 4,818</b>	<b>\$ 4,818</b>
SCG3728	C&S-Planning Coordination	300785817	6110020	SAL-MGMT S/T	\$ 3,739	\$ 3,739
			9121100	V&S L (CS)	\$ 738	\$ 738
			9122310	PR Tax NL (CS) SCG	\$ 340	\$ 340
<b>C&amp;S-Planning Coordination Total</b>					<b>\$ 4,818</b>	<b>\$ 4,818</b>
<b>Total</b>					<b>\$ 14,453</b>	<b>\$ 14,453</b>



C&S advocacy program allocated overhead  
for the period of June 2018-November 2019

**Attachment 3: C&S advocacy program allocated overhead for the period of June 2018-November 2019**

Year & Month	C&S Advocacy Subprogram	
	SCG3724 - Building Codes & Compliance Advocacy	SCG3725 - Appliance Standards Advocacy
2018-Jun	\$ 433	\$ 274
2018-Jul	\$ 185	\$ 216
2018-Aug	\$ 155	\$ 610
2018-Sep	\$ (242)	\$ (787)
2018-Oct	\$ (96)	\$ (290)
2018-Nov	\$ 16	\$ 55
2018-Dec	\$ (1,069)	\$ (3,200)
2019-Jan	\$ 232	\$ 679
2019-Feb	\$ 67	\$ 200
2019-Mar	\$ 76	\$ 228
2019-Apr	\$ 308	\$ 17
2019-May	\$ (146)	\$ (386)
2019-Jun	\$ 1	\$ 4
2019-Jul	\$ 17	\$ 45
2019-Aug	\$ (416)	\$ (743)
2019-Sep	\$ 8	\$ 24
2019-Oct	\$ (7)	\$ (20)
2019-Nov	\$ 23	\$ 64
<b>Total</b>	<b>\$ (456)</b>	<b>\$ (3,010)</b>

# APPENDIX C

**OFFICER VERIFICATION**

I am an officer of Southern California Gas Company and am authorized to make this verification on its behalf. The matters stated in the foregoing Application are true to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 10<sup>th</sup> day of January 2020, at Los Angeles, California.

By:           /s/ Jeffrey L. Walker            
Jeffrey L. Walker

Vice President  
Customer Solutions  
SOUTHERN CALIFORNIA GAS COMPANY