

**SOUTHERN CALIFORNIA GAS COMPANY
REQUESTING REAUTHORIZATION OF THE
CUSTOMER INCENTIVE PROGRAM**

(A.16-12-010)

(DATA REQUEST ORA-13)

**Date Requested: November 9, 2017
Date Responded: November 16, 2017**

QUESTION 1:

Please list and identify all the shareholder-funded programs that Southern California Gas Company has had in its operations from July 1, 1997 to July 1, 2017:

For each Shareholder Funded Program, state:

- (a) The date the program began and the date the program ended (if applicable), and if still ongoing, please indicate so;
- (b) The proceeding number in which the program was considered;
- (c) The decision number that authorized the program; and
- (e) A short description of the program.

RESPONSE 1:

SoCalGas objects to this request on the grounds that it is not relevant and unduly burdensome.

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QUESTION 2:

Please list and identify all the Performance Based Incentive Programs that Southern California Gas Company has had in its operations from July 1, 1997 to July 1, 2017:

For each Performance Based Incentive Program listed or identified above, state:

- (a) The date the program began and the date the program ended (if applicable), and if still ongoing, please indicate so;
- (b) The proceeding number in which the program was considered;
- (c) The decision number that authorized the program;
- (e) A short description of the program.

RESPONSE 2:

SoCalGas objects to this request on the grounds that it is vague and ambiguous as to the phrase "Performance Based Incentive Programs". For the purposes of this request, SoCalGas assumes that the phrase "Performance Based Incentive Programs" refers to "Performance Based Ratemaking Incentive Programs." Based on this interpretation, SoCalGas also objects to this requests on the grounds that it is not relevant and unduly burdensome.

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QUESTION 3:

In Response to Data Request ORA-10 Question 3(a), Southern California Gas Company proposed to refund embedded costs used in the development and implementation of the CIP tariff.

- a. Please state the cost of the embedded costs used in the development and implementation of the CIP tariff for each of the following years:
2012
2013
2014
2015
2016
- b. Please describe in full and complete detail how the embedded costs were calculated for each of the listed years.
- c. Please identify the particular employee or employees whose time were included in or constituted the embedded costs.
- d. Please describe what activities and job duties constituted the embedded costs.
- e. Please state how the embedded costs were recorded for accounting purposes.

RESPONSE 3:

- a. From 2012 to 2015, there are no costs related to the development and implementation of the proposed CIP tariff.

The cost below is the total amount of costs tracked in 2016 for the development of the proposed CIP tariff.

2016 – \$33,759

- b. Please see Section III of the Prepared Direct Testimony of Reginald M. Austria and SoCalGas' response to ORA-10 Question 2.

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- c. SoCalGas objects to this request on the grounds that it is not relevant. SoCalGas further objects to this requests on the grounds that it violates attorney-client privilege and attorney work product. Subject to its objections, SoCalGas responds by providing the names of its witnesses, regulatory case manager and counsel of record as follows: Rasha Prince (witness), Tuan Nguyen (witness), Reginald Austria (witness), Yvonne Mejia (regulatory case manager), Nancy Whang (legal counsel), and Johnny Tran (legal counsel).
 - d. Please see the SoCalGas' response to ORA-10 Question 2 (a).
 - e. Embedded costs have been recorded to a separate internal order number. For accounting treatment related to these costs, please refer to Section III of the Prepared Direct Testimony of Reginald M. Austria.

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Date Responded: November 16, 2017**

QUESTION 4:

State the dollar amount that Southern California Gas Company shareholders have expended or invested to fund the CIP program for the following years:

- a. 2012
- 2013
- 2014
- 2015
- 2016

b. Please describe in full and complete detail how the funds were expended in each of the listed years.

c. Please describe in full and complete detail how the embedded resource costs from the GRC were recorded to reflect the appropriate shareholder costs that should have been expended instead for accounting and refund purposes.

RESPONSE 4:

- a. The costs associated with the development of the proposed CIP were provided in the response to Question 3(a) above.
- b. Please see SoCalGas' response to ORA-10 Question 2(d).
- c. SoCalGas objects to this request on the grounds that it is vague and ambiguous as to the phrase "instead for account and refund purposes." Subject to this objection, SoCalGas responds as follows: Please see Section III of the Prepared Direct Testimony of Reginald M. Austria and SoCalGas' response to ORA-10 Question 2.

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Date Responded: November 16, 2017**

QUESTION 5:

In Response to ORA-12 Question 4, Applicant states that embedded resources are used to implement current programs. In Response to ORA-10 Question 3(e), Applicant states that “The current program is not required to credit the ratepayers for use of embedded resources. Ratepayers receive the benefit of additional load.” Please provide the estimated yearly dollar amount of embedded resources used to implement and administer the ongoing program activities for the current programs (i.e., CFPP and NCCLGOP) that Southern California Gas Company shareholders have avoided incurring to implement and administer the current programs since these programs were authorized.

RESPONSE 5:

SoCalGas objects to this request on the grounds that it is vague and ambiguous as to the phrase “Southern California Gas Company shareholders have avoided incurring to implement and administer the current programs since the programs were authorized.” SoCalGas further objects on the grounds that the phrase is argumentative. SoCalGas is not required to track or refund cost associated with implementing or administering the current programs. Pursuant to D.15-10-049, Conclusion of Law 33: “If SoCalGas proposes, through an application, any tariff in which shareholders assume the risks and benefits of the tariff, SoCalGas should begin tracking the costs to provide the tariff to a new internal order number at least 60 days prior to the submission of the application to the Commission.” Therefore, SoCalGas established an internal order to track the development costs of the proposed CIP at least 60 days prior to filing its application for the proposed CIP. Subject to its objections, SoCalGas responds as follows: SoCalGas is unable to provide an estimated yearly amount of embedded resources used to implement and administer the ongoing program activities for the current programs as SoCalGas was not required to track those costs.

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**Date Requested: November 9, 2017
Date Responded: November 22, 2017**

QUESTION 6:

In Response to ORA-05 Question 1F.c., SoCalGas provided links to its previous advice letter filings pertaining to the two current programs. Please provide for the years 2012 to 2016 the information that page 12 of Resolution G-3515 required SoCalGas to include in the 2017 Advice Letter filing for the Core Pricing Flexibility and the Noncore Competitive Load Growth Opportunities Programs. For each year, explain how the contracts improved energy efficiency and include detailed descriptions of the contracts as follows: customer name, technology installed, projected energy savings, whether the customer was existing or new, the baseload quantity, the minimum incremental quantity, the contract term, the tariff used, the set of qualifications each customer was required to meet to receive that tariff, whether the customer received a volumetric discount or an upfront billing credit, the value of that incentive or discount, and a copy of the contract.

Please format the explanation as was provided in the attachment to Advice Letter 5133 that is embedded in the icon below.

ORA-07_Attachment_
AL5133 Confidential.pdf

RESPONSE 6:

Please see the [confidential](#) attachment provided along with this response. The attachment contains confidential information and is provided pursuant to [Cal. Pub. Util. Code § 583, G.O. 66-C/D, D.16-08-024 and the accompanying declaration.](#)

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF RASHA PRINCE
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Rasha Prince, do declare as follows:

1. I am the Director of Commercial/Industrial Services for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Lisa M. Alexander, Vice President of Customer Solutions and Communications for SoCalGas. I have reviewed the Office of Ratepayers (ORA) data request response related to Application (A.)16-12-010, ORA-13, and attachments referenced therein (*ORA-13_Q6_Attachment_Confidential.xlsx*). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in ORA-13 and attachments submitted concurrently herewith, is within the scope of data protected as confidential under applicable law, and pursuant to California Public Utilities Code (“P.U. Code”) § 583 and General Order (“GO”) 66-C/D, as described in Attachment A hereto.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

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 16th day of November, 2017, at Los Angeles, California.

/s/Rasha Prince
Rasha Prince
Director of Commercial/Industrial
Services
Southern California Gas Company

ATTACHMENT A

SoCalGas Request for Confidentiality on the following Protected Information in Data Request Response to ORA- 13, Question 5

Location of Protected Information	Legal Citations	Narrative Justification
<p><i>Gray shaded portions, unless otherwise noted, in the file labeled: ORA-13_Q5_Attachment_Confidential.xlsx</i></p> <p>Column B “Customer Name” Column C “Technology Installed” Column D “Projected Energy Savings” Column F “Baseload Quantity” Column G “Incremental Load” Column H “Contract Term”</p> <p>Column M “Contract” (Contracts are confidential in their entirety)</p>	<p><i>See, e.g., D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential).</i></p> <p>GO 66-C Section 2.2(b) (“unfair business advantage”)</p> <p>Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 <i>et seq.</i></p> <p><i>See, e.g., D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential).</i></p> <p>GO 66-C Sections 2.2(b) (“unfair business advantage”), 2.8 (“Information obtained in confidence from other than a business regulated by this Commission where the disclosure would be against the public interest.”)</p>	<p>Data is market sensitive information that, if revealed, would place customers at an unfair business disadvantage because it provides market sensitive information regarding competitive data, equipment used and contract terms</p> <p>Contracts between the utility and third-party vendors that contain customer and vendor proprietary information, are commercially sensitive, and are subject to non-disclosure or confidentiality agreements.</p>