

**LONG BEACH DATA REQUEST
LB-SCG-002
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: APRIL 18, 2018
DATE RESPONDED: MAY 2, 2018**

Request 1

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

SoCalGas Response 1:

SoCalGas objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 030.060(g). Should the City of Long Beach seek to update its request, SoCalGas will respond to such a request as a new data request in the future. SoCalGas further objects to the definitions and instructions submitted by the City of Long Beach on the grounds that they are overbroad and unfairly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, attached are the **Confidential** and public documents provided in response to all intervenor data requests submitted to SoCalGas in this proceeding between December 26, 2017 and April 22, 2018. Confidential responses and attachments are marked as **Confidential and Protected Materials Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023**. Access to such Protected Materials is restricted to those Reviewing Representatives who have signed the Non-Disclosure Certificate in ALJ Lirag's December 13, 2017 Protective Order. Data requests received prior to December 26, 2017 were provided in response to LB-SCG-001. Parties' requests seeking all the discovery requests and responses to date are excluded.