

EDF DATA REQUEST
EDF-SCG-001
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: DECEMBER 20, 2017
DATE RESPONDED: JANAUARY 8, 2018

1. Please identify the amount of lost and unaccounted for (LUAF) gas for each of the last 5 years, including the basis for the determination. Please state this number as a percentage of Southern California Gas Company's total volume of gas and in total volume of gas (million cubic square feet (MCSF) per year). Please also identify whether these numbers are in reference to total gas acquired, total gas sold to customers, or amount of gas for which SoCal Gas recovers from ratepayers.

SoCalGas Response 1:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its Triennial Cost Allocation Proceeding (TCAP), not as part of the scope of this TY 2019 GRC Application. *See, e.g.*, D.16-10-004 (A.15-07-014); D.09-11-006, p.14 (approving settlement agreement in Phase 2 of SoCalGas and SDG&E's 2009 BCAP, including authorizing balancing treatment for LUAF and updating through the annual October advice letter adjustment).

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2. Please identify the amount of gas lost to the atmosphere for each of the last 5 years. This figure should be given in the following format:

- a. Volume of gas lost to the atmosphere (MCSF) for each year.
- b. Percent of total LUAF reported to the California Public Utilities Commission (CPUC or Commission) for each year.

SoCalGas Response 2:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

Additionally, SoCalGas objects to the request seeking information regarding the "volume of gas lost to the atmosphere," as the term is vague and ambiguous. SoCalGas interprets the phrase "gas lost to the atmosphere" to mean components of LUAF such as leakage and company use, which means the requested information is also outside the scope of this proceeding. As components of LUAF, such volumes of gas lost to atmosphere are fully balanced in SoCalGas' regulatory accounts, as authorized in SoCalGas' TCAP, not as part of the scope of this TY 2019 GRC Application.

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3. Please identify the basis for your determination that the percentage of LUAF gas is .9% for 2016.

SoCalGas Response 3:

SoCalGas was unable to determine what TY 2019 GRC testimony has any discussion of LUAF, as referenced in Question 3. SoCalGas has requested that EDF clarify where citations for LUAF can be found in the TYT2019 GRC Application or testimony. As the question's reference for this LUAF percentage is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF percentage is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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4. Please specifically identify the data used to determine the percentage of LUAF gas in 2016.

SoCalGas Response 4:

See SoCalGas' response to Question 3. As the question's reference for this LUAF percentage is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF percentage is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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5. Please identify the following concerning the data used to determine LUAF gas reported by the utility in 2016:
- a. What portions of the data come from meters or automated systems?
 - b. What portions of the data are derived from financial accounting or sales receipts?
 - c. What portions of the data come from emissions factors or engineering estimates

SoCalGas Response 5:

SoCalGas was unable to determine what TY 2019 GRC testimony has any discussion of LUAF, as referenced in Question 5. SoCalGas has requested that EDF clarify where citations for LUAF can be found in the TYT2019 GRC Application or testimony. As the question's reference for this LUAF gas reported is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF gas reported is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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6. Please identify whether any of the data and data sources listed in questions 4 and 5 have changed over the last 5 years.

SoCalGas Response 6:

See SoCalGas' responses to Questions 3-5. As the question's reference for this LUAF information is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF information is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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7. Please identify any changes the utility has made in the process used to determine the percentage of LUAF gas over the last five years.

SoCalGas Response 7:

See SoCalGas' response to Question 3. As the question's reference for this LUAF percentage is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF percentage is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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8. Please state any differences the between the utility's calculation of LUAF gas as it is reported to the CPUC and as it is reported to the Pipeline and Hazardous Materials Safety Administration (PHMSA), for each year starting in 2011 and continuing through 2016.

SoCalGas Response 8:

SoCalGas was unable to determine what TY 2019 GRC testimony has any discussion of LUAF gas reported, as referenced in Question 8. SoCalGas has requested that EDF clarify where citations for LUAF can be found in the TYT2019 GRC Application or testimony. As the question's reference for this LUAF gas reported is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF gas reported is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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9. Please state the amount of system-wide emissions in your territory from 2011-2016 (inclusive).

SoCalGas Response 9:

Emission information is publicly available via California Air Resources Board, the Environmental Protection Agency Subpart W, and SoCalGas' Leakage Abatement Annual Reports, which have been served upon EDF as a party to the SB 1371 Rulemaking (R.) 15-01-008 and can also be found at

<https://www.socalgas.com/regulatory/R1501008.shtml>

<https://www.epa.gov/ghgreporting/ghg-reporting-program-data-sets>

<https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/data>

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10. Please calculate how much the utility spent to acquire the gas that was calculated to have been lost to the atmosphere in each of the years 2011 – 2016 (inclusive).

SoCalGas Response 10:

SoCalGas objects to the request seeking information regarding the “gas that was calculated to have been lost to the atmosphere,” as the term is vague and ambiguous. SoCalGas interprets the phrase “gas that was calculated to have been lost to the atmosphere” to mean components of LUAF, such as leakage and company use gas, which means the requested information is also outside the scope of this proceeding. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. As components of LUAF, such volumes of gas lost to atmosphere are fully balanced in SoCalGas’ regulatory accounts, as authorized in SoCalGas’ TCAP, not as part of the scope of this TY 2019 GRC Application.

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11. Please calculate how much the utility received from ratepayers to cover the value of gas calculated to have been lost to the atmosphere in each of the years 2011 – 2016 (inclusive).

SoCalGas Response 11:

SoCalGas objects to the request seeking information regarding the “value of gas calculated to have been lost to the atmosphere,” as the term is vague and ambiguous. SoCalGas interprets the phrase “gas calculated to have been lost to the atmosphere” to mean components of LUAF such as leakage and company use gas, which means the requested information is also outside the scope of this proceeding. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. As components of LUAF, such volumes of gas lost to atmosphere are fully balanced in SoCalGas’ regulatory accounts, as authorized in SoCalGas’ TCAP, not as part of the scope of this TY 2019 GRC Application.

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12. Please calculate how much the utility spent to acquire the gas that it determined to be lost and unaccounted for in each of the years 2011 – 2016 (inclusive).

SoCalGas Response 12:

SoCalGas was unable to determine what TY 2019 GRC testimony has any discussion of LUAF, as referenced in Question 12. SoCalGas has requested that EDF clarify where citations for LUAF can be found in the TYT2019 GRC Application or testimony. As the question's reference for this LUAF information is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF information is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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13. Please calculate how much the utility received from ratepayers to cover the value gas that was determined to be lost and unaccounted for in each of the years 2011 – 2016 (inclusive).

SoCalGas Response 13:

See SoCalGas' response to Question 12. As the question's reference for this LUAF information is vague and ambiguous, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. Even if a reference for the LUAF information is provided by EDF, as indicated in the responses above, LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its TCAP, not as part of the scope of this TY 2019 GRC Application.

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14. Please identify all measures in your request for cost recovery in this general rate case (GRC) that are designed to reduce the amount of LUAF gas.

SoCalGas Response 14:

SoCalGas objects to this request on the grounds that the phrase “...measures in your cost recovery in this general rate case (GRC) that are designed to reduce the amount of LUAF gas” is vague and ambiguous and the term “LUAF gas” is vague and ambiguous as used. There are various methodologies to calculate LUAF depending on agency requirements and various components to calculating LUAF. As such, LUAF does not represent a “mass balance” or physical flow of gas. SoCalGas cannot determine what measures in its TY 2019 GRC Application are relevant to the question based on this ambiguity of terms used. Moreover, as indicated in the responses above, SoCalGas was unable to determine what TY 2019 GRC testimony has any discussion of LUAF.

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15. Please identify which of these measures identified in your answer to question 13 are designed to reduce the amount of gas lost to the atmosphere.

SoCalGas Response 15:

SoCalGas objects to this request on the grounds that it is vague and ambiguous as it refers SoCalGas back to Question 13, which does not require SoCalGas to identify any measures. SoCalGas will interpret this question to refer SoCalGas to Question 14 instead of Question 13. Based on this interpretation, SoCalGas objects to this request on the same grounds as stated in Question 14 and as such is unable to respond to this question, as SoCalGas was unable to identify measures in Question 14. Additionally, SoCalGas objects to the request seeking information regarding the “the amount of gas lost to the atmosphere,” as the term is vague and ambiguous. For this Question 15 only, SoCalGas interprets the phrase “gas lost to the atmosphere” to mean reduction of methane emissions. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas designs operational practices with the primary goals of safety, integrity, reliability, and resiliency of the system, which often are synergistic with environmental goals. Examples of operational practices identified in SoCalGas’ TY 2019 GRC testimony that carry co-benefits by reducing methane emissions include all the integrity programs such as TIMP, SIMP, and/or DIMP.

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16. Please identify the measures in each of the utility's Distribution Integrity Management Plan (DIMP), Transmissions Integrity Management Plan (TIMP) and Storage Integrity Management Plan (SIMP) that will also be relied upon for SB 1371 compliance.

- a. Please state the forecasted cost per year associated with each identified measure.
- b. Please state which of these measures are included in the request for cost recovery in this GRC.
- c. Please state whether and which of these measures are included in Advice Letter (AL) 5211 filed by the utility on October 31, 2017.

SoCalGas Response 16:

- a. See response to Question 15. None of these integrity management programs will be relied upon for SB 1371 compliance. Instead, SoCalGas identified incremental SB 1371 efforts that go beyond existing GRC safety- and integrity-driven programs and activities, as covered in the advice letter (AL) 5211 submitted on October 31, 2017.
- b. Please see the answer to Question 16a above.
- c. AL 5211 covers incremental work above and beyond the requirements set forth by 49 C.F.R. § 192, Subpart O, 49 C.F.R. § 192, Subpart P, and DOGGR 14 CCR § 1726.

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17. In AL 5211, the utility states there is no anticipated incremental cost associated with Best Practices 1-8 and 14, aside from administrative costs.¹ Please identify whether these costs are included in your requests for rate recovery in this GRC. If these costs are included in your GRC, please identify with specificity where those costs are described.

SoCalGas Response 17:

Best Practices 1-8 and 14 do not require incremental resources. The tasks required for these Best Practices are in line with SoCalGas' practices to update policies and procedures.

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18. Please describe the relationship between funding requests for DIMP and Practices and Activities to Reduce Risk (PAAR) (including the Distribution Risk Evaluation and Monitoring System's PAAR) and best practices (BP) under 1371 NERBA.

SoCalGas Response 18:

Please see Exhibit SCG-14, the Pipeline Integrity for Transmission and Distribution testimony of Maria Martinez, for a description of the funding requests for DIMP and PAARs. The funding level requested for the DIMP is to meet the requirements of 49 C.F.R. § 192, Subpart P.

SB 1371 Best Practices were established to specifically address the overall policies and requirements for a natural gas leakage abatement program. These activities are designed with the purpose of reducing methane emissions from the utilities' systems. These SB 1371 activities included in Advice Letter (AL) 5211 would be incremental to any GRC DIMP activities performed to comply with 49 C.F.R. § 192, Subpart P. An example of such SB 1371 incremental activities would be special leak surveys to comply with Best Practice 16, surveying at more frequent intervals than is required for safety reasons to reduce emissions. Activities prescribed by SB 1371 that are in excess of those required in 49 C.F.R. § 192, Subpart P will be funded by the NERBA, as noted in AL 5211.

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19. What legal basis and legal precedent does the utility have for asserting it is entitled to receive money for LUAF gas?

SoCalGas Response 19:

SoCalGas objects to this request on the grounds that it calls for a legal conclusion. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. LUAF cost is fully balanced in SoCalGas' regulatory accounts, and LUAF volumes for calculating the LUAF cost placed into rates is authorized in its Triennial Cost Allocation Proceeding (TCAP), not as part of the scope of this TY 2019 GRC Application. *See, e.g.*, D.16-10-004 (A.15-07-014); D.09-11-006, p.14 (approving settlement agreement in Phase 2 of SoCalGas and SDG&E's 2009 BCAP, including authorizing balancing treatment for LUAF and updating through the annual October advice letter adjustment). These proceedings and advice letters are matters of public record and the information is equally available to EDF.

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20. To the best of the utility's knowledge, has this basis or precedent ever been challenged in court or at the California Public Utilities Commission?

SoCalGas Response 20:

SoCalGas objects to this request on the grounds that it calls for a legal conclusion. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. The request seeks information that is outside the scope of this proceeding, as indicated on page 7 of SoCalGas/SDG&E's Reply to Protests and Responses, dated November 27, 2017. SoCalGas objects to the request to the extent it would require SoCalGas to search their files for matters of public record in CPUC proceedings or court cases (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to EDF.

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21. Please provide citations for documents used to determine the amount of recovery for LUAF on a yearly basis for 2011-2016 (inclusive). Please provide the document, page number, and line number of those documents, as applicable. Respectfully signed and submitted on December 19, 2017.

SoCalGas Response 21:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Further, SoCalGas objects to the request to the extent it would require SoCalGas to search their files for matters of public record in CPUC proceedings or court cases (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to EDF.