

**2020 COST OF CAPITAL - SOCALGAS [A.19-04-018]  
ENVIRONMENTAL DEFENSE FUND DATA REQUEST  
DR-EDF-01**

**DATE RECEIVED: JUNE 25, 2019  
DATE RESPONDED: JULY 9, 2019**

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1. Please provide us with a copy of each data request response provided in this proceeding. Please treat this as an ongoing request.

**Response 1:**

SoCalGas objects to EDF's request for ongoing updates as vague, overbroad, and unduly burdensome. SoCalGas will respond to data requests as they are propounded. Subject to and notwithstanding, SoCalGas responds as follows. Data request responses provided to parties are uploaded on SoCalGas's public website. Attachments accompanying any question can be supplied upon specific request.

In response to this question, SoCalGas is separately providing the corresponding attachments accompanying the data request responses to the Indicated Shippers (DR-IS-01) and Public Advocates (DR-PA-01), in the formats they were provided to those parties. Among those attachments are PROTECTED MATERIALS, which SoCalGas is providing to EDF pursuant to the terms of the executed Non-Disclosure Agreement.

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2. Please provide a complete set of workpapers in native electronic format used to support the requested change in Return on Equity. If such workpapers are confidential in part or in whole, please provide the non-disclosure agreement that allows intervening parties to review such workpapers.

**Response 2:**

See separately attached files.

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3. Please provide the final approved Results of Operations workpapers from the last approved General Rate Case.

**Response 3:**

See separately attached files.

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4. With regards to shareholder risks:
- a. Identify the top 10 shareholder risks identified by your utility management.
  - b. Please quantify each risk.
  - c. Please quantify the impact of each risk on the proposed Return on Equity.
  - d. Identify where each risk is addressed in the Risk Assessment and Mitigation Phase (RAMP) Report applicable to your utility and RAMP filings made by your utility.
  - e. Identify actions taken by your utility management to mitigate each risk.
  - f. Identify actions taken by the CPUC to mitigate each risk.
  - g. Identify actions taken by the CPUC that exacerbate each risk.
  - h. Identify actions taken by other state agencies that mitigate each risk.
  - i. Identify actions taken by other state agencies that exacerbate each risk.
  - j. Identify actions taken by the State Legislature that mitigate each risk.
  - k. Identify actions taken by the State Legislature that exacerbate each risk.
  - l. Identify actions taken by the Federal Energy Regulatory Commission that mitigate each risk.
  - m. Identify actions taken by the Federal Energy Regulatory Commission that exacerbate each risk.

**Response 4:**

SoCalGas objects to this question as vague, ambiguous, overbroad, and seeking information that is not relevant to, and out of scope of, this proceeding. Subject to and without waiving these objections, SoCalGas responds as follows. See the CPUC's Risk Assessment Mitigation Plan (RAMP)<sup>1</sup> documents, which can be accessed at:

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk\\_Assessment/RCR/Final%20Sempra%20RAMP%20030717.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk_Assessment/RCR/Final%20Sempra%20RAMP%20030717.pdf)

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk\\_Assessment/RCR/Final%20SED%20SB%20900%20SEMPRA%202019%20GRC%20Report%20030518.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk_Assessment/RCR/Final%20SED%20SB%20900%20SEMPRA%202019%20GRC%20Report%20030518.pdf)

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<sup>1</sup> In accordance with D.16-08-018 (pp. 120-123 and 195-196 (Ordering Para. 6)), SoCalGas did not include shareholders' financial interests in its risk models and decision frameworks used to support its 2016 RAMP Report or 2019 GRC proposals.

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5. With regards to changes in California's inverse condemnation law, please list any changes since 2012 in statute, regulatory code or CPUC decisions that have affected the interpretation of that legal doctrine.

**Response 5:**

SoCalGas objects on the basis that the question is vague, overbroad, and calls for legal conclusions. Subject to and without waiving these objections, SoCalGas responds as follows. The underlying information being sought would be in the public domain.

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6. Please list all cases in which your utility has been named as a defendant in an inverse condemnation action since 2000, with the original claim by the plaintiffs, and if available, the final amount awarded.

**Response 6:**

SoCalGas objects to the question as overbroad and seeking information that is not relevant (in terms of a 19-year time period). Subject to and without waiving this objection, SoCalGas responds as follows. See separately attached file.

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7. Please provide the calculation and workpapers of the added amount of equity required to balance debt equivalency from power purchase agreements, fuel purchase agreements or other long-term purchase agreements.

**Response 7:**

These types of agreements, as they relate to debt equivalency, appear to apply primarily to electric utility operations rather than gas operations. Notwithstanding, SoCalGas does not require any added equity to balance debt equivalency with respect to these types of agreements.

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8. Please list all power purchase agreements, fuel purchase agreements or other long-term purchase agreements in which your utility shareholders were required to absorb the costs of default, termination or modification rather than passing those costs through to ratepayers' rates, where those actions occurred after 2002.

- a. For those actions where shareholders absorbed some or all of the costs of those actions, please list the dollar amounts in total for those actions, and the share of those costs absorbed by shareholders, by ratepayers and by sellers or sellers' agents.

**Response 8:**

See response to question 7.



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9. Please list the amount of disallowed capital investment by year for investment done after approval by the CPUC in an applicable filing made by your utility.
- a. Please list the amount of capital investment disallowed by year for no longer being “used and useful.”

**Response 9:**

SoCalGas objects to this request on the basis that it seeks information that is not relevant to, and out of scope of, this proceeding. Further, the request is vague, ambiguous, and overbroad; and notwithstanding, this question appears to request information that would be unduly burdensome to attempt to prepare.

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10. Provide the organizational charts to the supervisor level for SoCalGas and Sempra Energy.

**Response 10:**

SoCalGas objects to this request on the basis that it is vague and overbroad and furthermore seeks information that is not relevant to this proceeding.