



*Public Advocates Office
California Public Utilities Commission*

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<http://publicadvocates.cpuc.ca.gov>

**DATA REQUEST
Southern California Gas Company
Incremental Funding for Customer Information System
Replacement Program
A.25-05-004**

Origination Date: September 2, 2025

Responses Due: September 16, 2025

To: Stella Rangel, srangel@socalgas.com
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From: Fauzia Nawaz
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cc: Charlotte Chitadje, Charlotte.Chitadje@cpuc.ca.gov
Peter Chau, Peter.Chau@cpuc.ca.gov

Data Request No: PubAdv-SoCalGas-007-FNZ
Exhibit Reference: SoCalGas-A.25-05-004, Chapters 1,2,3, & 4.
SoCalGas Witness: Various
Subject: Incremental O&M Funding for CIS Replacement Program

Please provide the following:

1. Referring to SoCalGas's response to data request PubAdv-SoCalGas-004-FNZ, Q1.a, the invoices provided do not contain information verifying the services received from the vendors. Please provide documentation that will confirm that the invoices are for the CIS Replacement Project. Additionally provide the information requested:
 - a. Contracts or purchase orders that outline the scope of work, deliverables, and agreed-upon timelines.
 - b. Proof of service delivery, such as work completion reports, service logs, or acceptance confirmations signed by the SoCalGas.
 - c. Payment records (e.g., check copies, payment confirmations) that match the invoice amounts and dates.

- d. Any correspondence or change orders that explain deviations from the original scope, cost, or schedule.
2. Referring to the CIS Replacement Project related recorded O&M cost of services provided by the vendors Osceola Consulting LLC., and The Select Group for the OOR services in Excel file Confidential_SoCalGas_CIS_CalPA_DR03_Q3 for the years 2024 and 2025, please provide the following documentation verifying SoCalGas's reported expenditures:
 - a. Vendor invoices that clearly describe the services provided, associated costs, and the dates the services were rendered.
 - b. Contracts or purchase orders that outline the scope of work, deliverables, and agreed-upon timelines.
 - c. Proof of service delivery, such as work completion reports, service logs, or acceptance confirmations signed by SoCalGas.
 - d. Payment records, including check copies or payment confirmations, that correspond to the invoice amounts and service dates.
 - e. Any correspondence or change orders that explain deviations from the original scope, cost, or schedule.
 3. Referring to the \$9.714 million forecasted OOR contract costs for 2026 provided in Excel file "Confidential_SoCalGas_CIS_CalPA_DR01_Q3a", please provide the following information:
 - a. Signed and finalized contracts that support these forecasted amounts and associated services.
 - b. If contracts have not yet been executed, please provide:
 - Draft contracts or scopes of work under negotiation
 - Procurement status and expected timelines for finalization
 - Basis for the cost estimates (e.g., vendor quotes, escalation assumptions)

Additionally, please provide vendor names, signed and finalized contracts if available, associated with the forecasted costs for the services Training Developer 2 and OOR WFM Edge.

4. Referring to forecasted \$20.932 million in Surge Staffing and \$6.908 million for Training and Delivery costs for 2026 in Excel file "Confidential_SoCalGas_CIS_CalPA_DR01_Q3a," please provide the following:
 - a. Vendor names associated with the forecasted cost categories.
 - b. Signed and finalized contracts that support these forecasted amounts and associated services.
 - c. If contracts have not yet been executed, please provide:
 - Draft contracts or scopes of work under negotiation
 - Procurement status and expected timelines for finalization
 - Basis for the cost estimates (e.g., vendor quotes, escalation assumptions)
5. Referring to SoCalGas's response to Q3a. of Cal Advocates' data request PubAdv-SoCalGas-005-FNZ, the last phase of the CIS Replacement Project ends on March 31, 2027.

Please explain the reason for cost forecasting for an additional three months until June 2027, if the CIS Replacement Project ends in March 2027. Additionally, please provide an explanation of the nature and purpose of the costs beyond March 2027.

6. Referring to SoCalGas's response to Q3 parts b, c.i, and c.ii of Cal Advocates' data request PubAdv-SoCalGas-005-FNZ, SoCalGas states that the cost estimates are not broken down by phase, as many of the activities and costs incurred are not specific to a particular phase, and that it does not have cost estimates or actuals broken down by Phase. However, for its TY 2024 GRC SoCalGas provided the cost breakdown by phase in detail in the table in SCG-13 Work-papers Completed Testimony of Evan D. Goldman (2024 GRC), Page 12 of 35. Please respond to the following:
 - a. Reason why SoCalGas did not develop phase-specific cost tracking in its current application A. 25-05-004.
 - b. Impact of the lack of phase-specific cost tracking on project management and oversight for the CIS Replacement Project.
 - c. SoCalGas's justification for the lack of phase-specific cost tracking, and measures taken to ensure transparency and accountability in cost reporting.
7. SoCalGas's response to Cal Advocates' data request PubAdv-SoCalGas-005-FNZ, Q.3.d.ii, states that 'Although costs are not forecasted or tracked by project phases, the estimate and timeline presented in spreadsheet "Confidential_SoCalGas_CIS_CalPA_DR01_Q3a" provided with DR01 remain valid.' This response suggests that the cost for each completed and ongoing phase is trackable. If so, please provide the phase-specific cost for each completed and ongoing phase of the CIS Replacement Project.
8. Please explain what the term "recovery" refers to when SoCalGas states "SoCalGas is seeking **recovery** in this application of \$24.9 million in incremental costs for the CIS Replacement Project beyond those approved in the TY 2024 General Rate Case (GRC) Decision (D.) 24-12-074.
9. Referring to Chapter-2 Prepared Direct Testimony of April McAllaster on AM-1 states "the O&M costs discussed in this chapter include all O&M costs of the Project, including those already incurred and total \$68.6 million. Please provide detailed information regarding the \$68.6 million referred to here.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).