

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR ANGELES LINK PHASE 1  
REASONABLENESS REVIEW (DATA REQUEST Cal PA-SCG-08)**

**Date Requested: February 27, 2026, Submitted: March 13, 2026**

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Throughout response to Data Request No. Cal Advocates-SCG-A2506011-007, SoCalGas refers to “miscellaneous costs which include ... Outside Legal” and provides a footnote that “These miscellaneous costs are prorated across studies.”<sup>1</sup>

FN 1: Southern California Gas Company Response to Data Request Cal PA-SCG-07, February 25, 2026, at 2.

**QUESTION 1:**

Referring to the statement “These miscellaneous costs are prorated across studies.” What is the total cost of “Outside Legal” included in the Application?

**RESPONSE 1:**

The total cost of “Outside Legal” included in the Application is \$3.4M.

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**QUESTION 2:**

Provide invoices for “Outside Legal” services that are associated with costs included in this Application.

**RESPONSE 2:**

SoCalGas objects to this request on the grounds that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine.

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**QUESTION 3:**

State the names of the law firm(s) that Southern California Gas Company (SoCalGas) hired as “Outside Legal” related to costs included in this Application.

**RESPONSE 3:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the cost recovery issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Latham & Watkins LLP, Nossaman LLP, and Jenner & Block LLP.

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**QUESTION 4:**

Why is "Outside Legal" included in miscellaneous costs instead of its own category?

**RESPONSE 4:**

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the cost recovery issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request to the extent it is argumentative.

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**QUESTION 5:**

Where in the Application, including Workpapers, are “Outside Legal” activities described?

**RESPONSE 5:**

SoCalGas objects to this request on the grounds it is unduly burdensome to the extent this information is equally available to the requesting party. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

“Outside Legal” costs, which are included within the category of miscellaneous expenses, are described in the following locations:

Testimony Chapter 1, Direct Testimony of Shiley Arazi and Amy Kitson

- SA-AK-10, Lines 14-19.
- SA-AK-10, Lines 24-25 including Footnote 44.

Chapter 2:

- Direct Testimony of Frank Lopez at FL-4, Line 11-15, including Footnote 13.
- Workpapers (Stakeholder Engagement) at FL-2 including footnote 6 and FL-4.
- Workpapers (ESJ Plan) at FL-4 and FL-1-2.

Chapter 3:

- Direct Testimony of Vijai Atavane at VA-3, Lines 7-9.
- Workpapers (Alternatives & Cost Effectiveness) at 1 and 3.
- Workpapers (Production) at 1 and 3.
- Workpapers (Demand) at 1 and 3.

Chapter 4

- Direct Testimony of Jessica Kinnahan Foley at JKF-3, Lines 8-10.
- Workpapers (Air Studies) at 1 and 3.
- Workpapers (Environmental) at 1 and 3.
- Workpapers (Permitting) at 1 and 3.
- Workpapers (Water) at 1 and 3.

Chapter 5

- Direct Testimony of Katrina Regan at KR-3, Lines 8-10.
- Workpapers (Engineering & Design) at 1 and 3.

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**QUESTION 6:**

If “Outside Legal” activities are not described in the Application, including Workpapers, explain why.

**RESPONSE 6:**

Not applicable. See response to Question 5.

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**QUESTION 7:**

Provide a description of “Outside Legal” services. Include a separate description for each study that “Outside Legal” costs are prorated across.

**RESPONSE 7:**

SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Outside legal supported multiple aspects of the Angeles Link Phase 1 effort, including but not limited to:

- (1) Support coordination and engagement with the Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES);
- (2) Support alignment and compliance with Decision (D.) 22-12-055;
- (3) Support alignment and compliance with Department of Energy (DOE) Funding Opportunity Announcement (FOA) requirements;
- (4) Support establishment and implementation of the Planning Advisory Group (PAG) and Community Based Organization (CBO) stakeholder engagement process;
- (5) Support preparation for PAG/CBO meetings;
- (6) Support responses to over 700 stakeholder comments (10,000+ pages);
- (7) Support preparation of quarterly reports;
- (8) Support development of Phase 1 scopes of work;
- (9) Support selection and retention of Phase 1 consultants;
- (10) Support alignment of Phase 1 studies with requirements of D.22-12-055 and DOE FOA and ARCHES, and other applicable regulatory and legal requirements;
- (11) Support incorporation of stakeholder feedback in Phase 1 studies;
- (12) Support preparation of the Angeles Link Phase 1 Consolidated Report; and
- (13) Support preparation of Angeles Link Phase 1 Framework for Affordability Considerations.

Outside legal costs were allocated using two methods: costs were directly assigned to a study when the legal services supported that specific study, and costs related to overall Angeles Link activities were allocated using a prorated percentage method.

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**QUESTION 8:**

How was the budget determined for “Outside Legal” with respect to the overall Phase I budget?

**RESPONSE 8:**

SoCalGas objects to this request on the grounds that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Legal needs and associated budgets were assessed on a continuing basis as the project progressed and were adjusted as necessary to address evolving issues and additional work that arose during the course of Phase 1.