

R.13-11-005

Order to Show Cause Against Southern California Gas Company Issued December 2, 2019

Sierra Club Exhibit

Exhibit SC-04

SierraClub-02_SoCalGas Response

ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

DATE RECEIVED: MAY 4, 2020

DATE SUBMITTED: JUNE 16, 2020

SoCalGas objects to Sierra Club's definition of "SoCalGas" as overbroad, specifically SoCalGas objects to SoCalGas's parent company Sempra Energy being included within the definition of SoCalGas. Sempra Energy is a separate entity and, unlike SoCalGas, is not a party to either Order to Show Cause ("OSC") in the Energy Efficiency proceeding. Sempra Energy's activities are outside of the scope of either OSC and further are neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. Thus, SoCalGas's responses do not include information on Sempra Energy or its activities.

Data requests related to the January 10, 2020 pre-filed testimony of Deanna Haines

QUESTION 1:

Refer to page 12, lines 8-14. Please explain why SoCalGas charged non-labor costs associated with the December 2018, May 2019, November 2019, and August 2020 DUTG meetings to a ratepayer-funded account, but charged non-labor expenses associated with the December 2018 DUTG meeting to a shareholder-funded account

RESPONSE 1:

SoCalGas objects to this question as not accurately reflecting SoCalGas's January 10, 2020 testimony of Deanna Haines. That testimony provides:

Since June 1, 2018, I have attended three meetings of the DUTG: on December 12, 2018, May 8, 2019, and August 20, 2019.²⁶ Nonlabor costs (e.g., travel and meal expenses) of \$877.43 associated with the December 2018 DUTG meeting and \$957.35 associated with the May 2019 DUTG meeting were charged to accounts which are funded by ratepayers in the GRC. Nonlabor costs of \$1,121.45 associated with the August 2019 DUTG meeting were charged to an account which is shareholder funded. As the historical costs for the 2018-2019 period are part of the next GRC that has not yet been filed, accounting can be subject to future adjustments during that cycle.

FN 26: Another SoCalGas employee attended a November 13-14, 2019 AGPA DUTG meeting as my proxy. The employee does not remember any discussion of energy efficiency codes and standards advocacy topics at the meeting. The non-labor

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

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SOUTHERN CALIFORNIA GAS COMPANY

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expenses (\$1,846.55) for the employee's attendance at this meeting were charged to accounts that are ratepayer funded through the GRC. The employee is a salaried employee whose labor costs are also charged to accounts that are ratepayer funded through the GRC (and not funded through the DSMBA).¹

The travel expenses associated with Deanna Haines attendance at the May 2019 DUTG meeting were originally recorded to accounts which are designated as funded by ratepayers in the GRC. The May 2019 DUTG meeting expenses have since been transferred to an account which is designated as being funded by shareholders. As stated in SoCalGas's testimony: "As the historical costs for the 2018-2019 period are part of the next GRC that has not yet been filed, accounting can be subject to future adjustments during that cycle."

¹ Prepared Direct Testimony of Deanna R. Haines on Behalf of Southern California Gas Company, Docket No. R.13-11-005 (January 10, 2020), p. 12.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

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QUESTION 2:

Refer to page 13, lines 10-12. Please explain how SoCalGas “participate[s] as a dues-paying member” in APGA activities when the organization’s website at <https://www.apga.org/aboutus/membership> lists membership opportunities only for municipal gas systems and “organizations that provide products and/or services for publicly owned natural gas distribution systems.” If SoCalGas falls into the latter category, please explain what specific products and/or services it provides to publicly owned gas distribution systems.

RESPONSE 2:

SoCalGas’s annual contribution is for the APGA’s Direct Use Task Group, of which it is a participant. SoCalGas is not a voting member of the APGA organization.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

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QUESTION 3:

Refer to page 14, lines 7-9.

- a. Please confirm that the portion of dues that AGA identifies as allocable to lobbying only include expenses for “lobbying” activities as defined by the federal Budget Reconciliation Act of 1993.
- b. Please confirm that the portion of dues that AGA identifies as allocable to lobbying do not include any of the following activities: (1) advocacy in a U.S. Department of Energy rulemaking proceeding; (2) advocacy before state agencies, such as the California Energy Commission; (3) advocacy before municipal and other local governments.

RESPONSE 3:

- a. AGA’s invoice provides: “Dues payments, contributions or gifts to the American Gas Association are not tax deductible as charitable contributions for federal income tax purposes. However, they may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of AGA’s lobbying activities as defined by the Budget Reconciliation Act of 1993.”
- b. SoCalGas does not have further insight into how AGA identifies the portion of dues as allocable to lobbying activities on its invoices.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

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DATE SUBMITTED: JUNE 16, 2020

General questions related to statewide advocacy

QUESTION 4:

Please provide full list of draft CASE reports that you forwarded to anyone outside the joint utilities working on the CASE team since January 1, 2014. For each draft CASE report you forwarded, please identify who you sent it to, the date you sent it, and all emails between you and the recipient about the draft.

RESPONSE 4:

Please see corresponding document production.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
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(R.13-11-005)

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DATE SUBMITTED: JUNE 16, 2020

Questions related to reach codes

QUESTION 5:

Please see the comment letter to the Culver City city council attached to this set of data requests as Attachment A.

- a. Please provide all communications between SoCalGas and Californians for Balanced Energy Solutions (C4BES) Executive Director Jon Switalski and/or Chair Eric Hofmann related to developing and publicizing this letter.
- b. Please provide all communications between SoCalGas and contractors providing services to C4BES related to developing or publicizing this letter.
- c. Did SoCalGas all or in part fund the development or efforts to publicize this letter?
- d. If the answer to (b) is yes, please state the amount of funding SoCalGas provided and what portion of these funds SoCalGas charged to ratepayer-funded accounts. Please also provide any contract or memorandum of understanding that SoCalGas entered related to this work.
- e. Please provide all other comment letters to other city councils or council members that SoCalGas has participated in developing and/or publicizing.

RESPONSE 5:

- a. In responding to this question, the business units most likely to come into contact with C4BES were provided with Sierra Club's question. SoCalGas has not identified any communications responsive to this question.
- b. In responding to this question, the business units most likely to come into contact with C4BES were provided with Sierra Club's question. SoCalGas has not identified any communications responsive to this question.
- c. SoCalGas has contributed funding to C4BES, but has not identified any evidence to date that it directed C4BES on how to use those funds in relation to Attachment A.
- d. SoCalGas's contributions to C4BES are recorded to accounts that are designated as 100% shareholder funded.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

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- e. SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects on the basis that as drafted this request is not limited to issues either relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas will not be providing a response to this question, but is willing to meet and confer with Sierra Club.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
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(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

DATE RECEIVED: MAY 4, 2020

DATE SUBMITTED: JUNE 16, 2020

QUESTION 6:

Please see the screenshot of the C4BES website attached to this set of data requests as Attachment B.

- a. Please provide all communications between SoCalGas and C4BES Executive Director Jon Switalski and/or Chair Eric Hofmannor and/or contractors providing services to C4BES related to attendance at Culver City's public meetings on its proposed reach code.
- b. Did SoCalGas all or in part fund the development of this web content
- c. If the answer to (b) is yes, please state the amount of funding SoCalGas provided and what portion of these funds SoCalGas charged to ratepayer-funded accounts. Please also provide any contract or memorandum of understanding that SoCalGas entered related to this work.

RESPONSE 6:

- a. In responding to this question, the business units most likely to come into contact with C4BES were provided with Sierra Club's question. This response relies, at least in part, on the memories of individuals and thus may not capture every communication. SoCalGas objects to the request for "all communications" as overbroad and unduly burdensome and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas has provided the communications identified as between SoCalGas and C4BES related to attendance at Culver City's public meetings on its proposed reach code. Subject to the above and without waiving its objection, SoCalGas responds as follows:

Please see corresponding document production.

- b. SoCalGas has contributed funding to C4BES, but has not identified any evidence to date that it directed C4BES on how to use those funds in relation to Attachment B.
- c. SoCalGas's contributions to C4BES are recorded to accounts that are designated as 100% shareholder funded.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

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QUESTION 7:

Please provide all communications between SoCalGas to the City of San Luis Obispo (“SLO”) from October 1, 2019 to the present related to SLO’s proposed reach code.

RESPONSE 7:

In responding to this question, the business units most likely to come into contact with the City of San Luis Obispo were provided with Sierra Club’s question. This response relies, at least in part, on the memories of individuals and thus may not capture every communication. SoCalGas objects to the request for “all communications” as overbroad and unduly burdensome and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas has provided the communications identified as between SoCalGas and the City of San Luis Obispo from October 1, 2019 to the present related to SLO’s proposed reach code. Subject to the above and without waiving its objections, SoCalGas responds as follows:

Please see corresponding document production, as well as the below.

10/9/19: SoCalGas Public Affairs Manager, SLO City Sustainability Manager and SLO Community Development Director discuss reach codes at Builder Association Breakfast.

1/6/20: SoCalGas Public Affairs Manager phone call to city hall scheduler/admin requesting meetings with mayor and council.

1/8/20: Response call from city hall scheduler/admin indicating mayor and council not interested in meeting.

2/20/20: SoCalGas Public Affairs Manager phone call to SLO City Sustainability Manager confirming discussion topics for meeting on 2/26/20. Also discussed temporary incentives for all electric buildings on Planning Commission Agenda 2/26/20.

2/26/2020: SoCalGas Public Affairs Manager, Policy Advisor, and Planning Manager had a meeting with SLO City Sustainability Manager and SLO Community Development Director to discuss reach code and Clean Energy Ordinance returning to the City Council Agenda on April 7, 2020, as well as to discuss renewable natural gas and energy efficiency.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
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(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

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DATE RECEIVED: MAY 4, 2020

DATE SUBMITTED: JUNE 16, 2020

QUESTION 8:

Please provide all communications between SoCalGas and C4BES Board Chair Eric Hofmann from October 1, 2019 to the present related to SLO's proposed reach code.

RESPONSE 8:

In responding to this question, the business units most likely to come into contact with C4BES were provided with Sierra Club's question. SoCalGas has not identified any communications responsive to this question.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

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QUESTION 9:

Please provide all communications between SoCalGas and employees of Marathon Communications, including, but not limited to Brian Lewis, Media Relations Director, from October 1, 2019 to the present related to SLO's proposed reach code.

RESPONSE 9:

In responding to this question, the business units most likely to come into contact with Marathon Communications were provided with Sierra Club's question. SoCalGas has not identified any communications responsive to this question.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

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QUESTION 10:

Please provide all communications between SoCalGas and staff, council members, or supervisors of the following cities and counties about reach codes since January 1, 2014:

- Artesia, including any email regarding potential reach codes to @cityofartesia.us accounts
- Avalon, including any email regarding potential reach codes to @cityofavalon.com accounts
- Claremont, including any email regarding potential reach codes to @ci.claremont.ca.us accounts
- Costa Mesa, including any email regarding potential reach codes to @costamesaca.gov accounts
- Culver City, including any email regarding potential reach codes to @culvercity.org accounts
- Encinitas, including any email regarding potential reach codes to @encinitasca.gov accounts
- Los Angeles County, including any email regarding potential reach codes to @lacounty.gov accounts
- Manhattan Beach, including any email regarding potential reach codes to @citymb.info accounts
- Redlands, including any email regarding potential reach codes to @cityofredlands.org accounts
- Santa Barbara, including any email regarding potential reach codes to @santabarbaraca.gov accounts
- Santa Monica, including any email regarding potential reach codes to @smgov.net accounts
- South Pasadena, including any email regarding potential reach codes to @southpasadenaca.gov accounts
- Ventura County, including any email regarding potential reach codes to @ventura.org accounts

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

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DATE RECEIVED: MAY 4, 2020

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RESPONSE 10:

In responding to this question, the business units most likely to come into contact with the identified cities were provided with Sierra Club's question. This response relies, at least in part, on the memories of individuals and thus may not capture every communication. SoCalGas objects to the request for "all communications" as overbroad and unduly burdensome and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas has provided the communications identified as between SoCalGas and staff, council members, or supervisors of the identified cities and counties about reach codes or potential reach codes since January 1, 2014. SoCalGas also understands "reach codes" to mean the process identified on the CEC website at <https://ww2.energy.ca.gov/title24/2016standards/ordinances/>. Subject to the above and without waiving its objections, SoCalGas responds as follows:

Please see corresponding document production, as well as the below.

Culver City

1/21/20 and 2/4/20: SoCalGas Policy Advisor and Public Affairs Manager attended public informational meetings on reach codes. The Policy Advisor asked questions to the city's consultant who attended. The same advisor also emailed the consultant around the same time period. SoCalGas no longer has copies of that communication. At the 2/4/20 meeting, the Public Affairs Manager spoke with the presenter regarding attendance and the reach codes discussed.

1/24/20: SoCalGas Public Affairs Manager spoke with council member Goran Eriksson who asked if the manager had attended any of the reach code meetings.

Santa Monica

9/10/19: Three SoCalGas employees made public comments during the City Council meeting in Santa Monica. These brief comments were informational in nature and concerned the importance of energy system resiliency for local climate adaptation efforts, the benefits and availability of renewable natural gas, and the emission reduction potential for projects that capture methane. SoCalGas also provided the documents identified in question 13 to the Santa Monica City Council at the meeting. In addition, a SoCalGas employee emailed the

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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

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DATE SUBMITTED: JUNE 16, 2020

Santa Monica City Clerk prior to the meeting to ask for a copy of the proposed language for the reach code in question. The City Clerk replied back that the proposed language would be available when the agenda for the meeting was posted. SoCalGas no longer has a copy of this communication.

10/17/19: SoCalGas Public Affairs Manager met with Santa Monica Council member Greg Morena to discuss the reach code that had been passed. Emails were exchanged between the Public Affairs Manager and the council member and his staff to request and schedule the meeting and to thank him for the meeting. SoCalGas no longer has copies of these communications. The Public Affairs manager had also emailed to try to set up a meeting with Council member Ana Maria Jara and never received a response. SoCalGas no longer has copies of this communications

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PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

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QUESTION 11:

Has SoCalGas contracted with consultants for services that include local government outreach on reach codes. If yes, please provide:

- a. All contracts for such services
- b. The amount of each contract's costs that SoCalGas charged to a ratepayer-funded account.
- c. The name of the consultant firm(s) and the principal contact at the firm(s).
- d. All communications between the consultant firm(s) and SoCalGas related to reach code adoption or potential reach code adoption in San Luis Obispo or any of the local governments listed in Data Request #10 in this set.

RESPONSE 11:

SoCalGas objects to this question as vague and ambiguous, specifically as to the term "outreach." Subject to and without waiving its objection, SoCalGas responds as follows:

- a. The costs associated with the only responsive consultant work identified by SoCalGas are recorded to accounts that are designated as 100% shareholder funded, thus, SoCalGas objects to this request as seeking information that would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas' and other's constitutional rights. *See e.g., NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. In addition, SoCalGas' 100% shareholder funded activity is neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence.
- b. The costs are recorded to accounts that are designated as 100% shareholder funded.
- c. See response to a.
- d. See response to a.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
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(R.13-11-005)

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(DATA REQUEST SIERRA CLUB-02)

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QUESTION 12:

Please see the letter to CEC Chairman Hochschild attached to this set of data requests as Attachment C.

- a. Please identify the SoCalGas employee or officer who authorized signing onto this letter.
- b. Please provide all communications between SoCalGas and the other signatories to this letter related this letter, including communications related to developing and signing onto the letter.
- c. Please identify the costs SoCalGas incurred (either in labor costs or contracting costs) to develop this letter and communicate with potential signatories, and the amount of those costs that SoCalGas billed to ratepayer-funded accounts.

RESPONSE 12:

- a. George Minter, Regional Vice President of External Affairs & Environmental Policy.
- b. In responding to this question, the business units most likely to come into contact with the other signatories to this letter were provided with Sierra Club's question. SoCalGas objects to the request for "all communications" as overbroad and unduly burdensome and neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas has provided the communications identified as between SoCalGas and the other signatories to this letter related this letter, including communications related to developing and signing onto the letter. Subject to the above and without waiving its objection, SoCalGas responds as follows:

Please see corresponding document production.

- c. The only identified costs incurred by SoCalGas are charged to accounts that are designated as 100% shareholder funded, thus, SoCalGas objects to this request 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. In addition, regarding labor costs, the employees involved are all salaried employees. As salaried employees, these employees would have been paid the same regardless and SoCalGas does not have a calculation of any labor costs associated with these activities. SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to

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PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-02)

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generate or create records which do not exist, or which have not been generated or created in its regular course of business, which obligation exceeds the requirements provided by the CPUC's Discovery Custom and Practice Guideline and California Code of Civil Procedure Section 2031.230.

**ORDER INSTITUTING RULEMAKING CONCERNING ENERGY EFFICIENCY ROLLING
PORTFOLIOS, POLICIES, PROGRAMS, EVALUATION, AND RELATED ISSUES**

(R.13-11-005)

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QUESTION 13:

Please see the following list of documents that SoCalGas submitted to the Santa Monica City Council for its September 10, 2019 meeting. For each document on this list, please state whether SoCalGas funded the development of the document and, if so, the amount of ratepayer funds for each document.

- SoCalGas' "CA Clean Energy Future – Imagine the Possibilities" whitepaper
- RNG Potential-UC Davis –Final Draft Report on The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute Contract No. 13-307, Prepared for the California Air Resources Board and the California Environmental Protection Agency
- Lawrence Livermore National Labs California Energy Commission Comment Letter "The Natural Gas Infrastructure and Decarbonization Targets"
- Dr. John Brower UC Irvine, (2) articles- "The real renewable energy storage solution", "Net-zero emissions energy systems" and list of P2G, NG, H2 Publications
- Navigant Study – "Analysis of the Role of Gas for a Low-Carbon California Future"
- ICF – "Case Studies of Natural Gas Sector Resilience Following Four Climate-Related Disasters in 2017"
- Secretary of Energy Ernest J. Moniz-Energy Futures Initiative "PATHWAYS FOR DEEP DECARBONIZATION IN CALIFORNIA"
- Secretary of Energy Ernest J. Moniz-Energy Futures Initiative, "The Green Real Deal" A FRAMEWORK FOR ACHIEVING A DEEPLY DECARBONIZED ECONOMY" August 2019
- ICF -- Re-Assessment of Renewable Natural Gas Study

RESPONSE 13:

SoCalGas objects to this request as overbroad and unduly burdensome. In addition, SoCalGas objects on the basis that this request seeks information that is neither relevant to the subject matter involved in the pending proceeding nor likely reasonably calculated to lead to the discovery of admissible evidence. The documents provided to the Santa Monica City Council are publicly available documents and do not concern reach codes. Instead the documents provide more general information on renewable natural gas and decarbonization and the role of natural gas.