

R.13-11-005

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

Sierra Club Exhibit

Exhibit SC-11

Sierra Club Data Request 08 Q2 b and e_Revised 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-SOCALGAS-08)

DATE RECEIVED: AUGUST 27, 2020

DATE SUBMITTED: SEPTEMBER 10, 2020

REVISED RESPONSE SUBMITTED: SEPTEMBER 25, 2020 (Q4)

REVISED RESPONSE SUBMITTED: OCTOBER 9, 2020 (Q2)

REVISED RESPONSE SUBMITTED: OCTOBER 27, 2020 (Q2 b and e)

QUESTION 1:

Please refer to PDF 077_Sierra_Club_SCG_01_R.13-11-005_000318.

- a. Please provide the storytelling prospectus attachment referenced in the email chain.
- b. Please state the total labor costs of SoCalGas employees' work on the storytelling prospectus referenced in the email chain.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the cost of developing the storytelling prospectus. If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 1:

SoCalGas objects to this request on the basis that it seeks information that is outside of the scope of either Order to Show Cause (OSC) against SoCalGas in R. 13-11-005, which concern activity related to energy efficiency codes and standards and reach codes. The document bates labeled 077_Sierra_Club_SCG_01_R.13-11-005_000318 does not concern energy efficiency codes and standards or reach codes.

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QUESTION 2:

Please refer to PDF 006_Sierra_Club_SCG_01_R.13-11-005_000020.

- a. Please provide the contract and scope of work with Ramboll for the work referenced in PDF 006_Sierra_Club_SCG_01_R.13-11-005_000020, including work related to “responding to Rocky Mountain Institute in the Title 24 CEC Proceeding” and “responding to the Sierra Club/UCLA study report.”
- b. Please state the funding source(s) (specific account and cost center) to which you charged the costs of the contract provided in response to part (a) and any other costs of “the Ramboll team” developing analyses to rebut Rocky Mountain Institute and UCLA reports on indoor air quality on behalf of SoCalGas or AGA. If you charged costs to more than one funding source, state the amount charged to each one.
- c. Please state the total labor costs of SoCalGas employees’ work with Ramboll and AGA in “responding to Rocky Mountain Institute in the Title 24 CEC Proceeding.”
- d. Please state the total labor costs of SoCalGas employees’ work with Ramboll and AGA in “responding to the Sierra Club/UCLA study report.”
- e. Please state the funding source(s) (specific account and cost center) to which you charged the costs of SoCalGas employees’ labor in developing the responses referenced in (c) and (d).

RESPONSE 2:

SoCalGas objects to this request on the basis that it seeks information that is outside of the scope of either Order to Show Cause (OSC) against SoCalGas in R. 13-11-005, which concern activity related to energy efficiency codes and standards and reach codes. The document bates labeled 006_Sierra_Club_SCG_01_R.13-11-005_000020 does not concern energy efficiency codes and standards or reach codes. The document concerns particulate emissions/indoor air quality.

Revised Response: SoCalGas and Sierra Club met and conferred regarding this response on October 5, 2020. SoCalGas continues to object to this request to the extent that it seeks

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information that is outside of the scope of either Order to Show Cause (OSC) against SoCalGas in R. 13-11-005, which concern activity related to energy efficiency codes and standards and reach codes. SoCalGas will provide responses to this request to the extent they relate to SoCalGas's participation in the California Energy Commission's ("CEC") Title 24 docket.

Information highlighted in yellow is confidential and protected material pursuant to PUC Section 583, GO 66-D, and D.17-09-023, and the parties' non-disclosure agreement.

- a. Please see attachment A for the contract and scope of work under which [REDACTED] performed work in connection with SoCalGas's participation in the CEC's Title 24 docket. SoCalGas has redacted information that is not related to work performed in connection with the CEC's Title 24 docket.
- b. SoCalGas objects to this request as vague and ambiguous, specifically the request to provide the "funding source" and "any other costs." SoCalGas further objects to this request to the extent it effectively seeks to pre-litigate the next General Rate Case (GRC). The allocations and valuations requested are not litigated until the next GRC where the 5- year historical period of actual costs is examined. As such, this request, in its current scope, is premature because the ultimate funding for the activities has not yet been determined or "allocated." As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Without waiving these objections, SoCalGas responds as follows: [REDACTED] work performed in connection with SoCalGas's participation in the CEC's Title 24 docket was recorded in cost center 2200-2396 and IO 300645966.
- c. SoCalGas objects to this question as overbroad and unduly burdensome. Further, SoCalGas objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records or data 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 Guidelines and California Code of Civil Procedure Section 2031.230 (proper response stating

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inability to comply with discovery request includes a statement that “the particular item or category [of records] has never existed”). See also A.05-04-020, *In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc.*, Administrative Law Judge’s Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that “Verizon is not required to create new documents responsive to the data request”) (also available at 2005 WL 1866062); A.05-02-027, *In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp.*, Administrative Law Judge’s Ruling Regarding ORA’s Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications “shall not be required to produce new studies specifically in response to this DR”) (also available at 2005 WL 1660395). Without waiving these objections, SoCalGas responds as follows: Although SoCalGas has been tracking the time spent by its employees in connection with SoCalGas’s work performed in connection with SoCalGas’s participation in the CEC’s Title 24 docket, at this time SoCalGas does not have a calculation of costs associated with those labor hours.

- d. See response to c.
- e. SoCalGas objects to this request to the extent it effectively seeks to pre-litigate the next General Rate Case (GRC). The allocations and valuations requested are not litigated until the next GRC where the 5- year historical period of actual costs is examined. As such, this request, in its current scope, is premature because the ultimate funding for the activities has not yet been determined or “allocated.” As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Without waiving these objections, SoCalGas responds as follows: SoCalGas’s employee’s work with ██████████ performed in connection with SoCalGas’s participation in the CEC’s Title 24 docket has been recorded in the following cost centers and IOs:

Cost Center 2200-2396, IO 300645966

Cost Center 2200-2609, IO 300645944; 300801286; 300808809; FG4264002200

Cost Center 2200-2441, IO FG92000002200

Cost Center 2200-2362, IO FG92000002200

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Cost Center 2100-4004, IO FC4264002100
Cost Center 2200-1212, IO FG9200002200
Cost Center 2200-2288, IO FG9080002200
Cost Center 2200-2288, IO FG9080002200
Cost Center 2200-1212, IO FG9200002200

Further Revised Response:

In response to subparts b and e., IO 300645966 was provided in error, the correct IO is 300645944. Thus, the cost center and IO listed should be Cost Center 2200-2396, IO 300645944.

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QUESTION 3:

Please refer to PDF 127_Sierra_Club_SCG_01_R.13-11-005_000456.

- a. Please provide the powerpoint presentation that Ms. Kristjansson presented at the 2017 Hot Water Forum.
- b. Please state the total cost of preparing and delivering this presentation, including travel and employee labor costs.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of this presentation. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the total costs of developing this paper that SoCalGas charged to ratepayer funded accounts.

RESPONSE 3:

- a. The presentation is attached.



ACEEE_HWF_Natura
IGasWH_Final.pdf

- b. SoCalGas objects to this question as overbroad and unduly burdensome. Further, SoCalGas objects to this Request to the extent that it imposes upon SoCalGas an obligation to generate or create records or data 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 Guidelines and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery request includes a statement that "the particular item or category [of records] has never existed"). See also A.05-04-020, *In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc.*, Administrative Law Judge's Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that "Verizon is not required to create new documents responsive to the data request") (also available at 2005 WL 1866062);

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A.05-02-027, *In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp.*, Administrative Law Judge's Ruling Regarding ORA's Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications "shall not be required to produce new studies specifically in response to this DR") (also available at 2005 WL 1660395). Without waiving these objections, SoCalGas responds as follows: SoCalGas's salaried employees do not track their time each day with the intent of reporting out an hourly log of activities. SoCalGas therefore does not have a calculation of costs associated with these labor hours. Travel costs for the ACEEE Hot Water Forum are \$2,113.76.

- c. SoCalGas objects to this question as overbroad and unduly burdensome, specifically the request to "state the total cost of preparing and delivering this presentation" Further, SoCalGas objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records or data 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 Guidelines and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery request includes a statement that "the particular item or category [of records] has never existed"). *See also* A.05-04-020, *In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc.*, Administrative Law Judge's Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that "Verizon is not required to create new documents responsive to the data request") (also available at 2005 WL 1866062); A.05-02-027, *In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp.*, Administrative Law Judge's Ruling Regarding ORA's Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications "shall not be required to produce new studies specifically in response to this DR") (also available at 2005 WL 1660395). Without waiving these objections, SoCalGas responds as follows: SoCalGas does not track costs by task or activity. In addition, SoCalGas's salaried employees do not track their time each day with the intent of reporting out an hourly log of activities. Thus, SoCalGas does not have a calculation of costs associated with "preparing and delivering this presentation" and is unable to identify a funding source used to track costs associated with "preparing and delivering this presentation". The travel costs

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for the ACEEE Hot Water Forum identified in (b) were charged to IO 300715749 –
2013-2017 C&S Planning Coordination Direct Implementation.

- d. The travel costs for the ACEEE Hot Water Forum identified in (b) were charged to
accounts designated as Above-the-Line.

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QUESTION 4:

Please refer to PDF 549_Sierra_Club_SCG_01_R.13-11-005_001822.

- a. How much funding, if any, did SoCalGas provide for this paper by Arthur Corbin, et al?
- b. Please state the funding source(s) (specific account and cost center) to which you charged the costs identified in response to part (a). If you charged costs to more than one funding source, state the amount charged to each one.
- c. How much funding, if any, did SoCalGas provide for the 2017 APGA paper “Levelized Cost of Energy: Expanding the Menu to Include Direct Use of Natural Gas”?
- d. Please state the funding source(s) (specific account and cost center) to which you charged the costs identified in response to part (c). If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 4:

SoCalGas queried the employees and groups most likely to have information regarding the question. SoCalGas had not identified information regarding whether or not SoCalGas provided funding for PDF 549_Sierra_Club_SCG_01_R.13-11-005_001822 or for the 2017 APGA paper “Levelized Cost of Energy: Expanding the Menu to Include Direct Use of Natural Gas” identified in PDF 549_Sierra_Club_SCG_01_R.13-11-005_001822. SoCalGas reserves the right to supplement this response if it identifies further information.

Updated Response: SoCalGas has not identified any evidence to date that it contributed any funding to either PDF 549_Sierra_Club_SCG_01_R.13-11-005_001822 or the 2017 APGA paper “Levelized Cost of Energy: Expanding the Menu to Include Direct Use of Natural Gas” identified in PDF 549_Sierra_Club_SCG_01_R.13-11-005_001822.

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QUESTION 5:

Please refer to the August 24, 2020 Supplemental Prepared Direct Testimony of Deanna R. Haines on behalf of Southern California Gas Company at page 3, line 13. Please provide the notes from the meeting SoCalGas distributed to its employees.

RESPONSE 5:



Notes from 08-12-20
CEC Business meeting

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QUESTION 6:

Please refer to the August 24, 2020 Supplemental Prepared Direct Testimony of Deanna R. Haines on behalf of Southern California Gas Company at page 4, lines 3-4. Please identify the “[p]ortions of the technical content in the Technical Comments” that “were provided by an employee of the American Gas association.”

RESPONSE 6:

In the Technical Comments referred to in the Supplemental Prepared Direct Testimony of Deanna R. Haines, which was attached as Attachment A to the August 24, 2020 Motion of SoCalGas for Leave to Serve Supplemental Prepared Direct Testimony in the Order to Show Cause Why SoCalGas Should Not Be Sanctioned for Violating a Commission Order and Rule 1.1 of the Commission’s Rules of Practice and Procedure (Issued October 3, 2019), it is SoCalGas’s understanding that the section on indoor air quality, as well as the attachment to the Technical Comments contain material from AGA and other sources. As stated in the supplemental testimony, the Technical Comments were prepared by a consultant.