

R.13-11-005

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

Sierra Club Exhibit

Exhibit SC-24

Sierra Club-07_Revised (Q11)_SoCalGas Response (Oct. 23, 2020)

**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-07)

DATE RECEIVED: AUGUST 21, 2020

DATE SUBMITTED: SEPTEMBER 11, 2020

REVISED RESPONSE: **OCTOBER 23, 2020**

QUESTION 1:

Please refer to PDF 544_Sierra_Club_SCG_01_R.13-11-005_001797.

- a. Please identify the APGA conference at which SoCalGas financed Alex Epstein's speaking fee.
- b. What was the total amount of money SoCalGas spent on Alex Epstein's speaking fee for that conference?
- c. Please state the funding source(s) (specific account and cost center) to which you charged the cost of Alex Epstein's speaking fee. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the total amount of money from Alex Epstein's speaking fee that SoCalGas charged to ratepayer funded accounts.

RESPONSE 1:

SoCalGas objects to this question as overbroad and unduly burdensome. SoCalGas sponsored the APGA's 2016 Marketing & Sales Trends & Training Conference (MSTTC), SIF Operations Conference, and Gas Policy Conference. SoCalGas does not have any record of a specific expenditure for a speaking fee. Based on available information, this conference does not appear to have concerned energy efficiency codes and standards or reach codes. Thus, 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.

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QUESTION 2:

Please refer to the email attached to this data request as Attachment A.

- a. Please state how many hours SoCalGas employees spent on the development of APGA's March 2017 letter to Secretary Perry.
- b. Please state the total labor costs of SoCalGas employees' work on APGA's March 2017 letter to Secretary Perry.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of developing APGA's March 2017 letter to Secretary Perry. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the funding source(s) (specific account and cost center) to which you charged Ms. Kristjansson's labor costs as a whole during March 2017. If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 2:

- a. 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); 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. Based on available

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information it appears that Sue Kristjansson was the only SoCalGas employee who may have spent time on the development of APGA's March 2017 letter to Secretary Perry. Ms. Kristjansson is no longer a SoCalGas employee. SoCalGas is unable to provide an estimate of labor hours.

- 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); 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.
- c. SoCalGas objects to this question as overbroad and unduly burdensome, specifically the request to "state the funding source(s) (specific account and cost center) to which you charged the costs of developing APGA's March 2017 letter to Secretary Perry." 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

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“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 “developing APGA’s March 2017 letter to Secretary Perry” and is unable to identify a funding source used to track costs associated with “developing APGA’s March 2017 letter to Secretary Perry”.

- d. SoCalGas objects to the request to “state the amount charged” to each funding source as ambiguous, vague, and unduly burdensome. SoCalGas also objects to this request to the extent it seeks information on costs that are unrelated to the issues in either OSC. Without waiving its objections, SoCalGas responds as follows:

Cost Center 2200-2238

Internal Orders:

FG925612200 Standard & Codes

300715659 – 2013-2017 SW C&S Building Code Compliance Advocacy

300715662 – 2013-2017 SW C&S Appliance Standard Advocacy

300715665 – 2013-2017 SW Compliance Enhancements

300715668 – 2013-2017 SW C&S Reach Codes

300715749 – 2013-2017 SW C&S Planning Coordination.

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QUESTION 3:

Please refer to the email attached to this data request as Attachment B.

- a. Please state how many hours SoCalGas employees spent on the development of APGA's July 2017 comments on Reducing Regulation and Controlling Regulatory Costs.
- b. Please state the total labor costs of SoCalGas employees' work on APGA's July 2017 comments on Reducing Regulation and Controlling Regulatory Costs.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of developing APGA's July 2017 comments on Reducing Regulation and Controlling Regulatory Costs. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the funding source(s) (specific account and cost center) to which you charged Ms. Kristjansson's labor costs as a whole during July 2017. If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 3:

- a. 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); 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,

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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. Based on available information it appears that Sue Kristjansson was the only SoCalGas employee who may have spent time on the development of APGA's July 2017 comments on Reducing Regulation and Controlling Regulatory Costs. Ms. Kristjansson is no longer a SoCalGas employee. SoCalGas is unable to provide an estimate of labor hours.

- 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); 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.
- c. SoCalGas objects to this question as overbroad and unduly burdensome, specifically the request to "funding source(s) (specific account and cost center) to which you charged the costs of developing APGA's July 2017 comments on Reducing Regulation and Controlling Regulatory Costs." 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*

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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 “developing APGA’s July 2017 comments on Reducing Regulation and Controlling Regulatory Costs” and is unable to identify a funding source used to track costs associated with “developing APGA’s July 2017 comments on Reducing Regulation and Controlling Regulatory Costs”.

- d. SoCalGas objects to the request to “state the amount charged” to each funding source as ambiguous, vague, and unduly burdensome. SoCalGas also objects to this request to the extent it seeks information on costs that are unrelated to the issues in either OSC. Without waiving its objections, SoCalGas responds as follows:
- Cost Center: 2200-2238
 - Internal Orders:
 - FG925612200 Standard & Codes
 - 300715659 – 2013-2014 SW C&S Building Code Compliance Advocacy
 - 300715662 – 2013-2014 SW C&S Appliance Standard Advocacy
 - 300715665 – 2013-2014 SW Compliance Enhancements
 - 300715668 – 2013-2014 SW C&S Reach Codes
 - 300715749 – 2013-2014 SW C&S Planning Coordination.

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QUESTION 4:

Please refer to PDF 492_Sierra_Club_SCG_01_R.13-11-005_001619.

- a. Please provide the contract and scope of work with Natural Resource Strategies Consultants for this presentation.
- b. Please state how much SoCalGas spent on this presentation.
- c. Please state how much SoCalGas spent on the contract as a whole.
- d. Please provide all other work product that Natural Resource Strategies Consultants provided SoCalGas under the contract identified in part (a)
- e. Please state the funding source(s) (specific account and cost center) to which you charged the costs of this presentation and the contract as a whole. If you charged costs to more than one funding source, state the amount charged to each one.
- f. Please state the total costs of this presentation and the contract as a whole that SoCalGas charged to ratepayer funded accounts.

RESPONSE 4:

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. More specifically, this request is outside of the scope of the *Order to Show Cause Directing SoCalGas to Address Shareholder Incentives for Codes and Standards Advocacy Expenditures* (issued December 17, 2019), whose scope is:

1. Whether Respondent booked any expenditures to its Demand Side Management Balancing Account, and associated allocated overhead costs, to advocate against more stringent codes and standards during any period of time between 2014 and 2017 (inclusive); and
2. Whether Respondent ever used ratepayer funds, regardless of the balancing account or other accounting mechanism to which such funds were booked, to advocate against local governments' adoption of reach codes.

The California Energy Commission's 2017 Integrated Energy Policy Report (IEPR) is a broad policy document with a scope that includes electricity resource plans, electricity and natural gas demand forecasts, transportation energy demand forecast, doubling of EE savings,

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climate adaptation and resiliency, distributed energy resources, Southern California energy reliability, existing power plan reliability, and renewable gas. The presentation summarizing the 2017 IEPR is not related to EE C&S advocacy, was not prepared as part of SoCalGas's EE portfolio and associated costs were not booked or recorded to SoCalGas's Demand Side Management Balancing account. Further, the 2017 IEPR does not concern reach codes.

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QUESTION 5:

Please refer to PDF 561_Sierra_Club_SCG_01_R.13-11-005_001855.

- a. Please identify the SoCalGas employees and/or contractors who contributed to this paper.
- b. How many hours did each individual and contractor identified in part (a) spend on the paper?
- c. Please state the total cost of developing this paper, including employee labor costs.
- d. Please state the funding source(s) (specific account and cost center) to which you charged the costs of developing this paper. If you charged costs to more than one funding source, state the amount charged to each one.
- e. Please state the total costs of developing this paper that SoCalGas charged to ratepayer funded accounts.

RESPONSE 5:

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 561_Sierra_Club_SCG_01_R.13-11-005_001855 does not concern energy efficiency codes and standards or reach codes.

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QUESTION 6:

Please refer to PDF 356_Sierra_Club_SCG_01_R.13-11-005_001146.

- a. Who presented SoCalGas' recommendations on the Furnace Rule at the AGA Board of Directors Meeting?
- b. Please identify all costs of developing and presenting SoCalGas' recommendations on the Furnace Rule at the AGA Board of Directors Meeting, including travel and labor costs.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of developing and presenting SoCalGas' recommendations on the Furnace Rule at the AGA Board of Directors Meeting. 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 and presenting SoCalGas' recommendations on the Furnace Rule at the AGA Board of Directors Meeting that SoCalGas charged to ratepayer funded accounts.
- e. Please provide the contents of "Tab E".
- f. Please provide the "separate attachment" that was included for additional background.

RESPONSE 6:

SoCalGas objects that the question lacks foundation, is speculative, and assumes from the referenced document that a presentation was made at the AGA Board of Directors' Meeting. At present, SoCalGas has no information to establish that assumption. As such, SoCalGas cannot answer questions a-d.

- e. SoCalGas has not been able to locate the contents of "Tab E".
- f. SoCalGas has not been able to locate the "separate attachment" that was included for additional background.

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QUESTION 7:

Please refer to PDF 456_Sierra_Club_SCG_01_R.13-11-005_001439.

- a. Please state how many hours SoCalGas spent providing the data that the American Gas Association requested.
- b. Please identify the labor costs for the time SoCalGas spent providing the data that the American Gas Association requested.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of providing the data that the American Gas Association requested. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the total costs of providing the data that the American Gas Association requested that SoCalGas charged to ratepayer funded accounts.

RESPONSE 7:

- a. 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); 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 has done a diligent search and cannot confirm that it provided the data that the American Gas Association requested.

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Further, SoCalGas's salaried employees do not track their time each day with the intent of reporting out an hourly log of activities. Given the length of time that has passed between the date of this document and the date of this request, SoCalGas is unable to provide an estimate of labor hours.

- 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); 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.
- c. SoCalGas objects to this question as overbroad and unduly burdensome, specifically the request to "stated the funding source(s) (specific account and cost center) to which you charged the costs of providing the data that the American Gas Association requested." 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

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“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 “providing the data that the American Gas Association requested” and is unable to identify a funding source used to track costs associated with “providing the data that the American Gas Association requested.”

- d. 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); 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.

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

(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-SOCALGAS-07)

DATE RECEIVED: AUGUST 21, 2020

DATE SUBMITTED: SEPTEMBER 11, 2020

REVISED RESPONSE: **OCTOBER 23, 2020**

QUESTION 8:

Please refer to PDF 395_Sierra_Club_SCG_01_R.13-11-005_001251.

- a. Please provide the contract and scope of work under which NegaWatt Consulting performed this analysis.
- b. Please provide all work product that NegaWatt Consulting provided SoCalGas under the contract and scope of work identified in part (a).
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of the contract with NegaWatt Consulting identified in part (a). If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the total costs of the contract identified in part (a) that SoCalGas charged to ratepayer funded accounts.

RESPONSE 8:

- a. Contract 5660043915 and SOW are attached as Sierra Club 07 Attachment A and Sierra Club Attachment B.
- b. SoCalGas objects to this question as overbroad and unduly burdensome. SoCalGas's contract with Negawatt has covered work product from 2015 to the present. SoCalGas does not have a single repository of all work product created by NegaWatt Consulting during this timeframe. Without waiving these objections, SoCalGas responds as follows: SoCalGas has performed a reasonable search to obtain the work product conducted under this contract and SOW and has provided a copy of the work product over its internal electronic data transfer site.
- c. The funding sources for the work performed under this contract are as follows:
Cost Center: 2200-2238
Internal Orders:
300715659 – 2013-2017 C&S Building Code Advocacy Direct Implementation
300715662 – 2013-2017 C&S Appliance Standards Advocacy Direct Implementation
300715665 – 2013-2017 C&S Compliance Enhancement Direct Implementation
300785801 – 2018 C&S Building Code Advocacy Direct Implementation

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(R.13-11-005)

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300785805 – 2018 C&S Appliance Standards Advocacy Direct Implementation
300785813 – 2018 C&S Reach Codes Direct Implementation
300794343 – 2019 C&S Compliance Enhancement Direct Implementation
300794346 – 2019 C&S Reach Codes Direct Implementation
300802160 – 2020 C&S Reach Codes Direct Implementation
DSMBA Total Costs: \$619,340

Cost Center: 2200-0429

Internal Order:

FG9080002200 – O&M - \$1,456

FG4264002200 – Shareholder - \$7,606

- d. From 2015 to present, SoCalGas has charged \$620,796 for this contract to accounts designated as Above-the-Line.

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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-SOCALGAS-07)

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QUESTION 9:

Please refer to PDF 028_Sierra_Club_SCG_01_R.13-11-005_000082.

- a. Please state how many hours SoCalGas employees spent on the development of the presentation referenced in this email chain and given at the 2017 Philadelphia TMAF.
- b. Please state the total labor costs of SoCalGas employees' work on this presentation.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of developing the 2017 TMAF presentation. If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please state the funding source(s) (specific account and cost center) to which you charged Ms. Kristjansson's labor costs as a whole during June 2017. If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 9:

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 referenced concerns Zero Net Energy, which is not related to energy efficiency codes and standards or reach codes.

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(R.13-11-005)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-SOCALGAS-07)

DATE RECEIVED: AUGUST 21, 2020

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QUESTION 10:

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

- a. Please provide all comments SoCalGas and/or its contractor(s) have filed and/or contributed to in the CEC's Title 24 proceeding, Docket 19-BSTD-03.
- b. Please provide the contract(s) and scope(s) of work for Natural Resources Strategies' work for SoCalGas related to the CEC's Title 24 proceeding.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of the contract in part (b). If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please provide any other contracts SoCalGas has entered for work related to the CEC's Title 24 proceeding, Docket 19-BSTD-03. Please provide the scope of work for all such contracts.
- e. Please state the funding source(s) (specific account and cost center) to which you charged the costs of all contracts identified in part (d). If you charged costs to more than one funding source, state the amount charged to each one.

RESPONSE 10:

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. Without waiving these objections, SoCalGas responds as follows:

- a. Please refer to the Supplemental Prepared Direct Testimony of Deanna R. Haines, pp. 3-4 and California Energy Commission Docket Log, *available at*, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?doctetnumber=19-BSTD-03>
- b. SoCalGas objects to this request to the extent it seeks contracts unrelated to energy efficiency codes and standards advocacy. Subject to and without waiving its objection, SoCalGas responds as follows: See Attachment C.
- c. Cost Center 2200-2396, IO 300645944

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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SIERRA CLUB-SOCALGAS-07)

DATE RECEIVED: AUGUST 21, 2020

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- d. SoCalGas objects to this request to the extent it seeks contracts unrelated to energy efficiency codes and standards advocacy. Subject to and without waiving its objection, SoCalGas responds as follows: There are no other contracts.
 - e. See response to d.

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QUESTION 11:

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

- a. Did SoCalGas enter a contract with the American Gas Association (“AGA”) for AGA to produce the analysis discussed in and attached to Ted Williams’ emails to SoCalGas, or did AGA produce this analysis as a membership benefit for SoCalGas?
- b. Please provide any contract or scope of work between SoCalGas and AGA for this analysis.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the costs of any contracts identified in part (b). If you charged costs to more than one funding source, state the amount charged to each one.
- d. Please provide all documents that were attached to Ted Williams’ May 12, 2020 email.

RESPONSE 11:

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 16 and October 19, 2020. SoCalGas continues to object to this request to the extent 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. 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 as related to Indoor Air Quality.

- a. SoCalGas is a member of the AGA and pays membership dues, however the AGA was not otherwise compensated for their time or the content they provided.
- b. N/A

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c. N/A

d. See attached. The attachment includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the parties' non-disclosure agreement.

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DATE RECEIVED: AUGUST 21, 2020

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QUESTION 12:


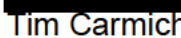
Please refer to PDF 006_Sierra_Club_SCG_01_R.13-11-005_000020.

- a. Please identify all SoCalGas employees who have developed and/or communicated SoCalGas' positions on the issues in the CEC's Title 24 proceeding, Docket 19-BSTD-03.
- b. Please state how many hours each of the employees identified in part a) have spent developing and/or communicating SoCalGas' positions on the issues in the CEC's Title 24 proceeding, Docket 19-BSTD-03.
- c. Please state the funding source(s) (specific account and cost center) to which you charged the cost of the labor identified in part (b). If you charged costs to more than one funding source, state the amount charged to each one. If the employees identified in part a) do not track their time for billing purposes, please state the funding sources of those employees' salaries in May 2020.
- d. Please provide all communications from SoCalGas to CEC staff and/or Commissioners related to the CEC's Title 24 proceeding, Docket 19-BSTD-03.

RESPONSE 12:

Information highlighted in yellow is confidential and protected material pursuant to PUC Section 583, GO 66-D, and D.17-09-023. Please see accompanying confidentiality declaration.

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. SoCalGas's response is limited to the activity discussed in the Supplemental Prepared Direct Testimony of Deanna R. Haines, served on September 10, 2020. Without waiving these objections, SoCalGas responds as follows:

- a. , Regulatory Affairs Manager
, Energy and Environmental Affairs Manager
Tim Carmichael, Agency Relations Manager

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Jill Tracy, Assistant General Counsel Litigation and Environmental
Deanna Haines, Director Environmental Policy
Joe Avila, Senior Director Energy Policy & Strategy
[REDACTED], Senior Counsel Litigation and Environmental

- b. [REDACTED]: 10 hours
[REDACTED]: 14 hours
Tim Carmichael: 9 hours
Jill Tracy: approximately 1 hour
Deanna Haines: 8 hours
Joe Avila: 5 hours
[REDACTED]: 45 minutes
- c. SoCalGas objects to this Request as it is vague, ambiguous and without foundation, and 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 that objection, SoCalGas responds as follows:
- Cost Center 2200-2441, IO 300808809
Cost Center 2200-1212, IO 300808809
Cost Center 2200-1212, IO 300645944
Cost Center 2200-2609, IOs 300645944, 300801286, FG4264002200, 300808809
Cost Center 2200-2362, IO FG9000002100
Cost Center 2200-2363, IO FG9000002100
Cost Center 2100-4004, IO FC4264002100
- d. In addition to the communications identified in the Supplemental Prepared Direct Testimony of Deanna R. Haines, SoCalGas has exchanged emails regarding the upcoming Title 24 workshops, which are attached as Sierra Club 07 Attachment D.