

Docket	R.13-11-005 :
Exhibit Number	Cal Advocates 03
Reference Number	
Commissioner	Randolph :
ALJ	Kao
Witnesses	Castello



**THE PUBLIC ADVOCATES OFFICE  
CALIFORNIA PUBLIC UTILITIES COMMISSION**

Public Advocates Office Date Request  
CAL ADVOCATES SC-SCG-2020-01

San Francisco, California  
August 21, 2020

**PUBLIC ADVOCATES OFFICE DATA REQUEST**  
**No. CalAdvocates-SC-SCG-2020-01**

Date: August 21, 2020

To: **Pamela Wu**

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Re: Data Request No. CalAdvocates-SC-SCG-2020-01

Response Requested: **Friday, September 4, 2020**

**INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal Advocates) contact(s) above with a copy to the Public Advocates Office attorney.

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after

providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

**If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible.** In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

### **DEFINITIONS**

- A. As used herein, the terms “you,” “your(s),” “Company,” and “SoCalGas” mean Southern California Gas Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1<sup>st</sup> of January and the 31<sup>st</sup> of

January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1<sup>st</sup>, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31<sup>st</sup>.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

## DATA REQUEST

Questions 1 - 3 ask for information about the following accounts:<sup>1</sup>

300785801  
300785805  
300785809  
300785813  
300785817  
300799469  
300346722  
300346821  
300346822  
300346824  
300346772

1. For each of the accounts identified above please provide:
  - a. The account description/name. Please spell out any abbreviations.
  - b. The responsible cost center.
  - c. Any FERC accounts the IO settles to.
  - d. Any charging cost centers.
  - e. The categorization as either Base Business or Non-base Business.
  - f. The categorization as either Capital or Operations & Maintenance (O&M).
  - g. The Overhead Key.
2. For each of the accounts identified above please provide the following:
  - a. The Work Order Authorization (WOA) which created the account in SoCalGas' SAP accounting system.<sup>2</sup>
  - b. Any other process documentation which directed staff on how to create the account in SAP.
3. Identify which of the accounts listed above are ratepayer funded and which are shareholder funded.
  - a. Provide documentary evidence<sup>3</sup> to support each and every designation made.
4. For all FERC accounts identified in response to question 1.c, please state:
  - a. The FERC description.
  - b. If that FERC account is automatically included or excluded from General Rate Case (GRC) forecasts.
5. Provide the Costing Sheet overview for procedure SCG101. If this is provided with SAP screenshots, provide enough screenshots to clearly display each row and column.
6. What is FG4264002200?
  - a. Explain what "FG" indicates.

<sup>1</sup> See SoCalGas' response to Data Request - CalAdvocates-EP-SCG-2020-01 Question 1.

<sup>2</sup> It is the Public Advocates Office's understanding that SoCalGas regularly uses WOAs to create new internal order (IO) accounts.

<sup>3</sup> An example would be a WOA showing the account settles to a FERC account that is automatically excluded from GRC forecasts). This is only an illustrative example and should only be understood as one of many acceptable forms of documentation.

7. Provide SoCalGas' most up to date cost center to FERC account mapping.