

Docket	R.13-11-005 :
Exhibit Number	Cal Advocates 04
Reference Number	
Commissioner	Randolph :
ALJ	Kao
Witnesses	Castello



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

Southern California Gas Company Energy  
Efficiency Codes and  
Standards Response to Data Request Cal  
Advocates-SC-SCG-2020-01

San Francisco, California  
September 4, 2020

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
**(DATA REQUEST CalAdvocates-SC-SCG-2020-01)**

**DATE RECEIVED: AUGUST 21, 2020**  
**DATE SUBMITTED: SEPTEMBER 4, 2020**

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**QUESTION 1:**

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

300785801  
300785805  
300785809  
300785813  
300785817  
300799469  
300346722  
300346821  
300346822  
300346824  
300346772

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.

**RESPONSE 1:**

Account 300346722 was not included in SoCalGas' response to Data Request – CalAdvocates-SCG-2020-01 Question 1 and appears to be listed here in error. For orders 300785801; 300785805; 300785809; 300785813; 300785817; and 300799469, please see Attachment A.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY CODES AND STANDARDS**  
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**QUESTION 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.

**RESPONSE 2:**

- a. For orders 300785801; 300785805; 300785809; 300785813; 300785817 due to restrictions caused by employees working remotely, the WOA is not currently accessible. SoCalGas will provide an update by September 25. For 300799469, please see Attachment B.

WOA forms are not required for pool orders 300346821, 300346822, 300346772, and 300346824. Pool activities are overhead costs which do not lend themselves to direct charging but benefit a project. For example, employee benefits, which include medical, dental, and vision costs are "direct costs" that are "pooled" and allocated to cost centers and projects based upon a cost driver, i.e. direct labor. The Payroll Tax Overhead is used to allocate the employer portion of payroll taxes associated with employee labor, such as payments to the State and Federal Governments for State Unemployment Insurance, Federal Unemployment Insurance and Federal Retirement and Medicare Insurance. The Vacation & Sick (V&S) Overhead is used to allocate costs paid by the utility for non-productive time such as vacations, holidays, sick days, and jury duty.

- b. For 300799469, please see Attachment C.

**SOUTHERN CALIFORNIA GAS COMPANY**  
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**QUESTION 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.

**RESPONSE 3:**

Internal Order	Current Funding Source <sup>1</sup>	Documentary Evidence
300785801	Above the Line	Please see Attachment D, Appendix A, Table 4
300785805	Above the Line	
300785809	Above the Line	
300785813	Above the Line	
300785817	Above the Line	
300799469	Below the Line	See Attachment B in response to Question 2
300346821	Depends <sup>1</sup>	As explained in response to Question 2 and below in Note 1, no additional documentary evidence exists.
300346822	Depends <sup>1</sup>	
300346824	Depends <sup>1</sup>	
300346772	Depends <sup>1</sup>	

Note 1: As explained in response to Question 2, the V&S and Payroll Tax Pool overhead costs may settle to cost centers and projects, so the actual funding source cannot be readily determined. It's possible that these costs are both above the line and below the line funded.

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<sup>1</sup> Since historical costs for the 2018-2020 period are part of the next GRC, which has not been filed, accounting can be subject to future adjustments during that cycle.

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**QUESTION 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.

**RESPONSE 4:**

<b>FERC Account</b>	<b>FERC Description</b>	<b>GRC Treatment</b>
FG908000	Customer Assistance Expenses	GRC treatment is not determined by the FERC account information alone.
FG426400	Expenditures for Certain Civic, Political and Related Activities	This FERC account is automatically excluded from the GRC
184	Clearing Accounts	GRC treatment is not determined by the FERC account information alone.
408.1	Taxes Other than Income Taxes	GRC treatment is not determined by the FERC account information alone.

**SOUTHERN CALIFORNIA GAS COMPANY**  
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**QUESTION 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.

**RESPONSE 5:**

SoCalGas objects to this question as vague and ambiguous. Costing sheets control parameters for all aspects of overhead calculations. Procedure SCG101 is used for Cost Center and O&M IO overhead calculations. This, combined with Overhead Keys coded on an IO/Cost Center, defines which overheads will be applied on the said IO/Cost Center.

**SOUTHERN CALIFORNIA GAS COMPANY  
ENERGY EFFICIENCY CODES AND STANDARDS  
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**QUESTION 6:**

What is FG4264002200?

- a. Explain what "FG" indicates.

**RESPONSE 6:**

FG4264002200 is a FERC statistical internal order and the FG denotes FERC Gas.

**SOUTHERN CALIFORNIA GAS COMPANY**  
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**QUESTION 7:**

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

**RESPONSE 7:**

SoCalGas objects to this question as overly broad, vague, and ambiguous. SoCalGas also objects to this question to the extent it seeks information outside the scope of either Order to Show Cause in R.13-11-005.

For the purposes of this response, the information provided is limited to the two responsible cost centers listed in response to Question 1c and the FERC accounts those cost centers have recorded costs to during the January 2019 to July 2020 timeframe. Please see below for a list of the associated FERC mapping. FERC classification for activity in these cost centers is determined at the transaction level based on the nature of the activity. These are only direct costs, they do not include settled costs from overhead pool distributions.

<b>FERC Acct</b>	<b>2200-0429</b>	<b>2200-2048</b>
107000G	\$ 2,996	
107410G		\$ 305
107420G		\$ 1,185
146200G	\$ 976,424	\$ 80,591
174000G	\$ 10,203,242	\$ 4,486
184570G	\$ 1,131,244	\$ 303,019
426400G	\$ 8,479	
850000G	-\$ 947	\$ 68
850770G	\$ 1	\$ 107
870000G	-\$ 2,840	
870770G		\$ 28
870850G		\$ 73
880202G	\$ 4,208	
887770G	-\$ 1	
901000G	\$ 23,039	\$ 452,844
903100G	\$ 22,135	
908000G	\$ 110,423,829	\$ 5,222,533
921000G	\$ 74,359	\$ 8,156
921200G	\$ 6,048	\$ 1,830
923000G	\$ 1,088	\$ 231
926200G	\$ 5,036	\$ 457
926300G	\$ 85	
930200G	\$ 2,603	\$ 3,000
935600G	\$ 10,988	
<b>Overall Result</b>	<b>\$ 122,892,017</b>	<b>\$ 6,078,914</b>



**ATTACHMENT A**

**CAL ADVOCATES  
SC-SC-2020-01**

Internal Order	Name (1A)	Responsible Cost Center (1B)	Settlement FERC Account (1C)	Charging Cost Centers (1D)	Base or Non Base (1E)	Cap or O&M (1F)	Overhead Key (1G)
300785801	Codes & Standards-BUILDING CODES & COMPLIANCE ADVOCACY – DIRECT IMPLEME	2200-2048; Policy and Support	FG908000	2200-2238 Codes & Standards; 2200-0429 Small Commercial & Industrial Segment Manager;	Base	O&M	220050
300785805	Codes & Standards-APPLIANCE STANDARDS ADVOCACY – DIRECT IMPLEMENTATION	2200-2048; Policy and Support	FG908000	2200-2238 Codes & Standards; 2200-0429 Small Commercial & Industrial Segment Manager; 2200-2560 Clean Transportation Business Development;	Base	O&M	220050
300785809	Codes & Standards-COMPLIANCE ENHANCEMENT – DIRECT IMPLEMENTATION	2200-2048; Policy and Support	FG908000	2200-2193 Energy Efficiency Partner; 2200-2238 Codes & Standards; 2200-0429 Small Commercial & Industrial Segment Manager; 2200-0942 CSF Staff; 2200-0238 ERC FOOD SERVICE SPV	Base	O&M	220050
300785813	Codes & Standards-REACH CODES – DIRECT IMPLEMENTATION	2200-2048; Policy and Support	FG908000	2200-2193 Energy Efficiency Partner; 2200-0429 Small Commercial & Industrial Segment Manager; 2200-2238 Codes & Standards	Base	O&M	220050
300785817	Codes & Standards-PLANNING COORDINATION - DIRECT IMPLEMENTATION	2200-2048; Policy and Support	FG908000	2200-2193 Energy Efficiency Partner; 2200-0429 Small Commercial & Industrial Segment Manager; 2200-2238 Codes & Standards	Base	O&M	220050
300799469	2019 CODES & STANDARDS	2200-0429; SMALL C&I SEGMENT MGR	Original FERC was FG908000; Changed to FG426400	2200-0429	Base	O&M	220050
300346821	Collector Vacation & Sick	N/A - This is a Pool Internal Order	184	All cost centers with vacation and sick time	N/A - This is a Pool Internal Order	Neither - this is a clearing	N/A - This is a Pool Internal Order
300346822	Pool Vacation & Sick	N/A - This is a Pool Internal Order	184	All costs are settled from collector internal order 300346821	N/A - This is a Pool Internal Order	Neither - this is a clearing	N/A - This is a Pool Internal Order
300346772	Collector Payroll Taxes	N/A - This is a Pool Internal Order	408.1	N/A - Income taxes are interfaced from MyTime or posting from HR Accounting	N/A - This is a Pool Internal Order	Neither - this is a clearing	N/A - This is a Pool Internal Order
300346824	Pool Payroll Taxes	N/A - This is a Pool Internal Order	184	N/A - All costs are settled from collector internal order 300346772	N/A - This is a Pool Internal Order	Neither - this is a clearing	N/A - This is a Pool Internal Order

**ATTACHMENT B**

**CAL ADVOCATES  
SC-SC-2020-01**

**[PUBLIC]**

300 799 469

<b>WORK ORDER AUTHORIZATION FOR SEMPRA ENERGY UTILITIES</b>			COMPANY CODE		Work Order No: <b>28370</b>
Field names with ALL CAPITAL letters are required.			2200	CAPITAL <input type="checkbox"/>	O&M <input checked="" type="checkbox"/>
TITLE 2019 Codes & Standards			Thomas Bros.		WR/DPSS Number:
					BUDGET CODE:

DATE PREPARED: 8/13/2019	EST. START DATE: 8/13/2019	EST. COMPLETION DATE: 12/31/2019	BILLING CODE: NC	0%
RESPONSIBLE COST CENTER: 2200-0429	Regulatory Prg/UDF:	Phase 1 <input type="checkbox"/>	Phase 2 <input type="checkbox"/>	Prelim Eng Survey (Ferc 163) <input type="checkbox"/>
ORGANIZATION:	OPERATING AREA/DISTRICT:	Shared Asset <input type="checkbox"/>	OPERATING REGION:	
COUNTY:	MUNICIPALITY:	Billable to: Affiliate <input type="checkbox"/>	Third Party <input type="checkbox"/>	Sending Order <input type="checkbox"/>
			Receiving Order <input type="checkbox"/>	

**TECHNICAL/ECONOMIC PROJECT REVIEWS\***

<input type="checkbox"/> Legal	By:	Date:
<input type="checkbox"/> Tax	By:	Date:
<input type="checkbox"/> Accounting	By:	Date:
<input type="checkbox"/> Planning	By:	Date:

\*Required for all base business, non-base business & administrative approval for WOA's or AFE's over \$30, \$15, & \$50 million respectively, prior to review and approval as appropriate. If a contract initially totals \$20 million or more, the reviews must be evidenced by completion of an Internal Reviewer Checklist (RC). For more details, please refer to the CAU Approval & Commitment Policy in the intranet.

Comments regarding Technical/Economic Project Review:

Reference Approval and Commitment Policy:

CATEGORY 1 Base Business	CATEGORY 2 Non-base Bus.
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**JOB SCOPE SUMMARY**

Bill to Name & Address:

CODE	DETAILED DESCRIPTION OF WORK	FERC ACCOUNT	%	Acc'tg Dept Use (Enter 1/0s)
	Remove charges from Refundable programs and move to Shareholders expenses.	F900		
<b>PROCESSED</b>				
Charging Cost Centers to this order				
Receiver	Co.	Amount	Or	%
<b>APPROVALS</b>				
Project Approved up to/on order				
Preparer		Date	8/13/2019	Mail Loc:
Project Mgr		Date	8/13/2019	Mail Loc:
Line Manager		Date		Mail Loc:
Line Director		Date		Mail Loc:
Functional Committee Chair		Date		Mail Loc:
Functional V P		Date		Mail Loc:
Utility President		Date		Mail Loc:
Utility - C. Ed.		Date		Mail Loc:

ESTIMATED COSTS	Capital Installation	Capital Removal	O&M	Total	
Company Labor	\$ -	\$ -	\$ -	\$ -	
Contract Costs	-	-	-	-	
Material	-	-	-	-	
Other Direct Charges	-	-	100,000	100,000	
<b>Total Direct Cost</b>	-	-	<b>100,000</b>	<b>100,000</b>	
Affiliate Transfer In Costs	-	-	-	-	
Labor Indirects	-	-	-	-	
Material Indirects	-	-	-	-	
Other Indirects	-	-	-	-	
Ad Valorem Tax (ERC decision)	-	-	-	-	
AFUDC	-	-	-	-	
<b>Total Indirect Costs</b>	-	-	-	-	
<b>Gross Expenditures</b>	-	-	<b>100,000</b>	<b>100,000</b>	
ITCCA (Y or N)	22.00%	y	-	-	
Less: Billing/Part Contr.					
<b>Total Net Estimated Costs</b>				<b>100,000</b>	
<b>Gross Expenditures by year:</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
\$	100,000	\$		\$	

**From:** Gonzalez, Ricardo  
**Sent:** Wednesday, August 14, 2019 3:17 PM  
**To:** [REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

Then this is the FERC account that should be used. The activity hasn't changed – just cost recovery.

**Ricardo Gonzalez**  
Utility Accounting Manager  
Southern California Gas Company  
555 W. Fifth Street | GT15C1 | Los Angeles, CA 90013  
[REDACTED]  
[rgonzalez5@semprautilities.com](mailto:rgonzalez5@semprautilities.com)



**From:** [REDACTED]  
**Sent:** Wednesday, August 14, 2019 3:16 PM  
**To:** Gonzalez, Ricardo <[RGonzalez5@socalgas.com](mailto:RGonzalez5@socalgas.com)> [REDACTED]  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

Based on the following internal orders (IOs), the ferc account is F908000G CUST ASSISTANCE EXP. [REDACTED] please provide the IOs if the ones used below is not correct. Thanks.

- 300794873 2019 3C-REN CODES & STANDARDS
- 300794875 2019 3C-REN CODES & STANDARDS - DI
- 300794874 2019 3C-REN CODES & STANDARDS -MKT

**From:** Gonzalez, Ricardo <[RGonzalez5@socalgas.com](mailto:RGonzalez5@socalgas.com)>  
**Sent:** Wednesday, August 14, 2019 2:55 PM  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

What is the FERC account that is being used for the refundable IOs that these costs are being transferred out from?

**Ricardo Gonzalez**  
Utility Accounting Manager  
Southern California Gas Company  
555 W. Fifth Street | GT15C1 | Los Angeles, CA 90013  
[REDACTED]  
[rgonzalez5@semprautilities.com](mailto:rgonzalez5@semprautilities.com)



**From:** [REDACTED]  
**Sent:** Wednesday, August 14, 2019 2:49 PM

To: [REDACTED] Gonzalez, Ricardo <RGonzalez5@socalgas.com>; [REDACTED]

Subject: RE: Urgent Receiving Order for SCG

Hi Ric,

Do you have any objects to coding it to Ferc 417.1?

Thanks,

[REDACTED]  
Plant Accounting  
Southern California Gas Company

From: [REDACTED]

Sent: Wednesday, August 14, 2019 10:13 AM

To: Gonzalez, Ricardo <RGonzalez5@socalgas.com>; [REDACTED]

Subject: RE: Urgent Receiving Order for SCG

The account below may be more appropriate per FERC Chart of Accounts (<https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=054f2bfd518f9926aac4b73489f11c67&rgn=div5&view=text&node=18:1.0.1.6.46&idno=18>)

**417.1 Expenses of nonutility operations.**

A. These accounts shall include revenues and expenses applicable to operations which are nonutility in character but nevertheless constitute a distinct operating activity of the enterprise as a whole, such as the operation of an ice department where applicable statutes do not define such operation as a utility, or the operation of a servicing organization for furnishing supervision, management, engineering, and similar services to others.

B. The expenses shall include all elements of costs incurred in such operations, and the accounts shall be maintained so as to permit ready summarization as follows:

- Operation.
- Maintenance.
- Rents.
- Depreciation.
- Amortization.

NOTE B: Related taxes shall be recorded in account 408.2, Taxes Other Than Income Taxes, Other Income and Deductions, or account 409.2, Income Taxes, Other Income and Deductions, as appropriate.

From: Gonzalez, Ricardo <RGonzalez5@socalgas.com>

Sent: Wednesday, August 14, 2019 9:31 AM

Cc: [REDACTED]

Subject: RE: Urgent Receiving Order for SCG

FERC 421.2 is for loss of disposition of property. Based on the description of the WOA we should be using the FERC account associated with codes and standards activities.

**Ricardo Gonzalez**

Utility Accounting Manager  
Southern California Gas Company  
555 W. Fifth Street | GT15C1 | Los Angeles, CA 90013

[rgonzalez5@semprautilities.com](mailto:rgonzalez5@semprautilities.com)



**From:** [REDACTED]  
**Sent:** Wednesday, August 14, 2019 9:22 AM  
**To:** [REDACTED]  
[REDACTED] Gonzalez, Ricardo <[RGonzalez5@socalgas.com](mailto:RGonzalez5@socalgas.com)>  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

I don't see an issue with using that account.

Thanks.

- [REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, August 14, 2019 8:53 AM  
**To:** [REDACTED]  
[REDACTED] Gonzalez, Ricardo <[RGonzalez5@socalgas.com](mailto:RGonzalez5@socalgas.com)>  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

Hi Everyone,

PSEP has a disallowance order that uses FERC F421200G "SHAREHOLDER DISALLOW".

Does anyone see any issue with using this FERC for [REDACTED]'s order? Please let us know. Thanks! [REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, August 13, 2019 4:38 PM  
**To:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

Thanks [REDACTED] I am not aware of a shareholder account to use. After the email was forwarded to Rick, I have not seen further guidance from him.

**From:** [REDACTED]  
**Sent:** Tuesday, August 13, 2019 4:33 PM  
**To:** [REDACTED]

[REDACTED]  
**Subject:** Re: Urgent Receiving Order for SCG

Hi [REDACTED]

This is the IO request that [REDACTED] and Rick we're discussing to move our codes & standards costs to shareholders.

Get [Outlook for iOS](#)

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**From** [REDACTED]  
**Sent:** Tuesday, August 13, 2019 4:15:29 PM

[REDACTED]  
[REDACTED]  
**Subject:** RE: Urgent Receiving Order for SCG

Hi [REDACTED]

Thanks for dropping by. I don't know what account to use. Usually the IO requestor provides that information. Thanks.

**From:** [REDACTED]  
**Sent:** Tuesday, August 13, 2019 1:59 PM


[REDACTED]  
[REDACTED]  
**Subject:** Urgent Receiving Order for SCG

Hi [REDACTED]

I just received a Receiving Order request and the description is to remove charges from refundable programs to Shareholders expenses. Do you know what account I should use for this request? Please let me know as soon as possible as this order needs to be set up today.

Thanks,

[REDACTED]  
Plant Accounting  
Southern California Gas Company

 [REDACTED]



**ATTACHMENT C**

**CAL ADVOCATES  
SC-SC-2020-01**

**[PUBLIC]**

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Exclude from O&M Reporting - IO# 300799469  
**Date:** Wednesday, March 18, 2020 9:37:12 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.jpg](#)  
[image004.jpg](#)

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Hi [REDACTED]  
We have a need to modify the Plan Settlement rule for IO: 300799469  
The current "Plan version 2 – FERC Dist" settlement rule for this IO is shown as follows:



We want to modify the "Plan version 2 – FERC Dist" settlement rule (effective this month) for this IO to the following:



The basis for this change is explained in the email below. Let us know if you need a specific form to make the change. If no form is necessary, I would appreciate it if you can update us once the change is made.  
Thank you

---

**From:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Exclude from O&M Reporting - IO# 300799469

Hi [REDACTED]  
This is an O&M order created by [REDACTED] in Plant Accounting. Please send a request to him.  
You may want to confirm with Fin Systems regarding changing the FERC and how BW retro adjusts the prior costs.

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**From:** [REDACTED]  
**Sent:** Tuesday, March 17, 2020 4:02 PM  
**To:** [REDACTED]  
**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

How do we modify the current FERC Settlement rule for the IO [REDACTED]  
If any costs have been charged, I believe we will have to make a JE to correct the issue.  
Let me know.  
Thanks

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**From:** [REDACTED]  
**Sent:** Tuesday, March 17, 2020 3:59 PM  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Hi All,  
Yes, FG4264002200 is used for civic and related activities.

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**From:** [REDACTED]  
**Sent:** Monday, March 16, 2020 6:49 PM  
**To:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Hi [REDACTED]  
Yes, there should be a FERC for cost outside of rate payers. I believe it is FG4264002200 (found out later), but please confirm with ABC?  
Thank you,

*Budgets Strategy & Oversight*  
*Customer Programs & Assistance*  
*Southern California Gas Company*

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**From:** [REDACTED]  
**Sent:** Monday, March 16, 2020 6:24 PM  
**To:** [REDACTED]  
[REDACTED]  
**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Hi [REDACTED]  
Thank you for your response. The issue that we are having is with how the current FERC settlement rule of the order. We have now confirmed that these costs are for advocacy activities that are "outside of ratepayers". We need to have this order settle to a FERC account that is not part of the GRC.  
I would ask ABC to see if we can find the appropriate FERC to which to charge these costs. Angel, can you provide some guidance as to what FERC should be used?  
In planning, we will exclude this order from our Division O&C reporting on a monthly basis. Bhakti, make sure these are excluded from our monthly reporting starting in March.  
Thanks

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**From:** [REDACTED]  
**Sent:** Sunday, March 15, 2020 4:01 PM

**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Hi [REDACTED]

On the explanation as to why the IO# 300799469 should be excluded from O&M is due to following reasons IO# was created, if required, to track cost for C&S advocacy outside of ratepayers. For this reason it should not be reported as part of the O&M (ratepayer fund)

Regards,

[REDACTED]  
*Budgets Strategy & Oversight  
Customer Programs & Assistance  
Southern California Gas Company*

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**From:** [REDACTED]

**Sent:** Friday, March 13, 2020 7:09 PM

**To:** [REDACTED]

[REDACTED]

**Subject:** Re: Exclude from O&M Reporting - IO# 300799469

Yeah, I meant FG908. We will wait for [REDACTED] explanation

Thanks

[REDACTED]  
[REDACTED]

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**From:** [REDACTED]

**Sent:** Friday, March 13, 2020 6:09:50 PM

[REDACTED] >

[REDACTED]

**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

[REDACTED] I will defer to [REDACTED] on the issue as to why these are shareholder costs. Also, I think you meant that this was settling to FG908000G, not FG9088000G, correct? And yes, this FERC is part of GRC

David, can you clarify on the shareholder cost issue?

Thanks

---

**From:** [REDACTED]

**Sent:** Friday, March 13, 2020 5:43 PM

**To:** [REDACTED]

[REDACTED]

**Subject:** FW: Exclude from O&M Reporting - IO# 300799469

Hi [REDACTED]

I believe you mentioned that this IO is tracking shareholder costs and should be excluded from Div O&C. Can you please help explain why these are shareholder costs?

Another question that I have is the FERC Settlement rule of this IO. It looks like it is settling to F9088000G. Is this FERC part of the GRC?

I would appreciate your help

Thanks

[REDACTED]  
[REDACTED]

---

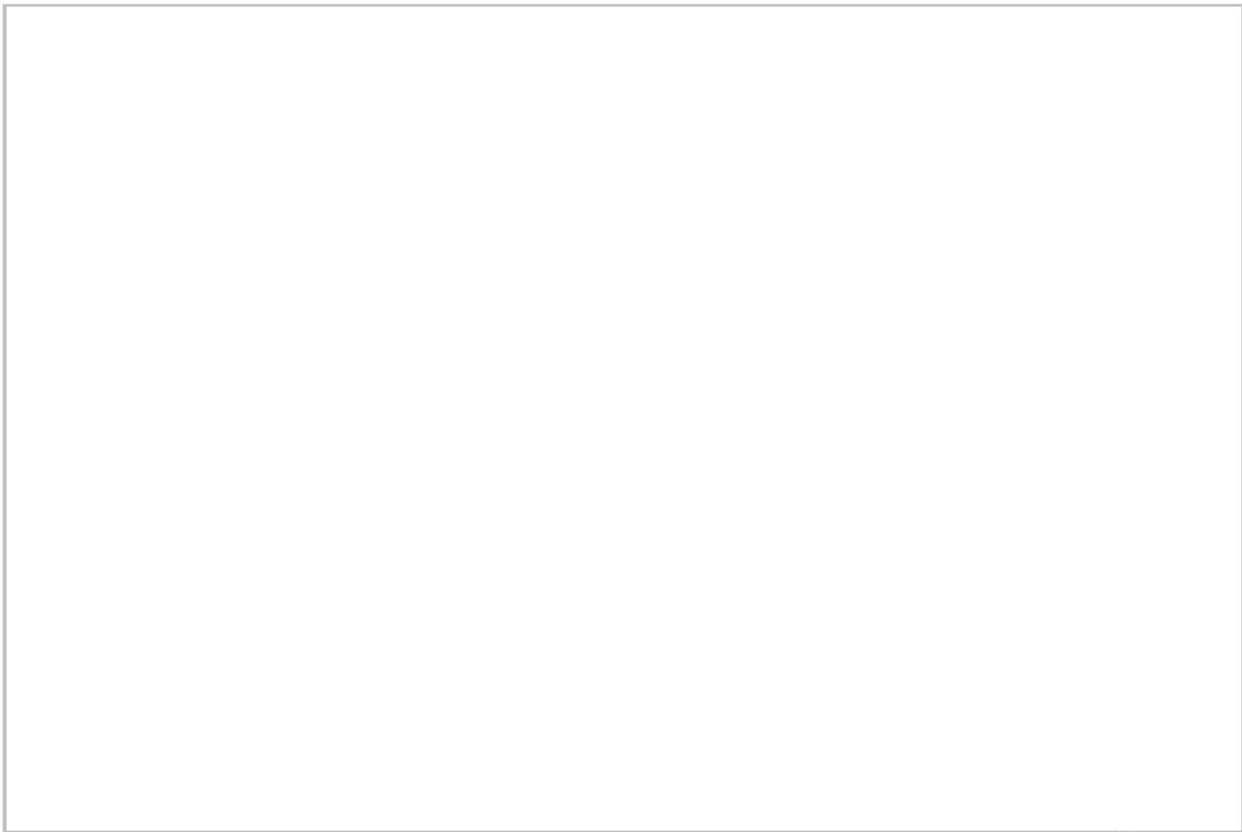
**From:** [REDACTED]

**Sent:** Tuesday, February 4, 2020 10:03 AM

**To:** [REDACTED]

**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Here you go



[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, February 4, 2020 10:00 AM  
**To:** [REDACTED]  
**Subject:** FW: Exclude from O&M Reporting - IO# 300799469

Need your help Can you look up this order in SAP and let me know how the plan settlement rule?  
Thanks

**From:** [REDACTED]  
**Sent:** Tuesday, February 4, 2020 9:23 AM  
**To:** [REDACTED]  
**Subject:** RE: Exclude from O&M Reporting - IO# 300799469

Thanks, [REDACTED]  
Do any other business units charge to this IO?  
[REDACTED] - please exclude this IO from the Division O&C reporting; it s shareholder funded

**From:** [REDACTED]  
**Sent:** Sunday, February 2, 2020 8:46 AM  
**To:** [REDACTED]  
**Subject:** FW: Exclude from O&M Reporting - IO# 300799469

[REDACTED], I never heard back from you on this to confirm  
Thank you

**From:** [REDACTED]  
**Sent:** Tuesday, January 14, 2020 4:36 PM  
**To:** [REDACTED]  
**Subject:** Exclude from O&M Reporting - IO# 300799469

[REDACTED]  
On a go-forward basis, please exclude IO# 300799469 from your monthly O&C variance reporting, as this IO# is shareholder funded  
If you have any questions, please address them to both [REDACTED] and myself  
Regards

██████████  
Senior Business Analyst  
Cust. Prog Budget & Policy  
██████████

**ATTACHMENT D**

**CAL ADVOCATES  
SC-SC-2020-01**

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



REVISED

June 28, 2018

**Advice Letter 5183-G-A**

Ronald van der Leeden  
Director, Regulatory Affairs  
Southern California Gas  
555 W. Fifth Street, GT14D6  
Los Angeles, CA 90013-1011

**SUBJECT: Southern California Gas Company Request for Approval of Annual Energy Efficiency Budget Filing for Program Year 2018**

Dear Mr. van der Leeden:

Advice Letter 5183-G-A is effective June 5, 2018, per Decision 18-05-041, Ordering Paragraph 14.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Director, Energy Division



Ronald van der Leeden  
Director  
Regulatory Affairs

555 W. Fifth Street, GT14D6  
Los Angeles, CA 90013-1011  
Tel: 213.244.2009  
Fax: 213.244.4957

[RvanderLeeden@semprautilities.com](mailto:RvanderLeeden@semprautilities.com)

November 22, 2017

Advice No. 5183-A  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Supplement - Southern California Gas Company Request for Approval of Annual Energy Efficiency Budget Filing for Program Year 2018**

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) its 2018 Energy Efficiency (EE) Program Portfolio budget. The EE Program Portfolio, along with supporting documentation, is incorporated as Appendix A, which have been uploaded to the California Energy Data and Reporting System (CEDARS) website.<sup>1</sup>

**Purpose**

This supplemental filing replaces in its entirety Advice Letter No. (AL) 5183, Southern California Gas Company Request for Approval of Annual Energy Efficiency Budget Filing for Program Year 2018, filed on September 1, 2017. This supplemental filing is pursuant to the Energy Division request to supplement AL 5183 to include the following:<sup>2</sup>

- New cost-effectiveness showing using Cost Effectiveness Tool (CET) version 18.1, released September 25, 2017 and includes interim greenhouse gas (GHG) adder; and
- 2018 goals as established in D.17-09-025.

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<sup>1</sup> <https://cedars.sound-data.com>.

<sup>2</sup> On October 30, 2017, the Commission's Energy Division issued a letter (Energy Division Letter) requesting such information.



This supplemental filing also requests an increase to SoCalGas' Energy Efficiency Portfolio Budget for 2018. Following the direction of the Commission<sup>3</sup> and Energy Division, SoCalGas designates AL 5183-A as a Tier 3 AL.

### **Background**

On October 24, 2014, the Commission issued Decision (D.) 14-10-046, which authorizes funding for EE programs until 2025.<sup>4</sup> On October 22, 2015, the Commission issued D.15-10-028, which approved the EE rolling portfolio mechanics for 2016 and beyond, and explained that annual AL filings will propose detailed budgets for cost recovery, transfer, and contracting purposes.<sup>5</sup>

On October 2, 2017, the Commission issued D.17-09-025, which adopted new energy savings goals for ratepayer-funded energy efficiency program portfolios for 2018 and beyond. On September 25, 2017 SoCalGas filed a motion for relief to file an amended Business Plan to seek incremental funding to meet the Commission's increased gas energy efficiency goals.

On October 30, 2017, SoCalGas received a letter from Energy Division, which in addition to requesting this supplemental AL, stated, "In instances where SoCalGas proposes to increase a program budget, it will provide related evidence of whether and how the budget increase will lead to increased savings from that program. D.14-10-046 sets a maximum annual budget and to exceed that budget requires commission approval. A tier 3 advice letter, properly noticed, is an appropriate vehicle to request an increase in the budget limit."

On November 13, 2017, ALJ Fitch issued an e-mail ruling denying SoCalGas' motion to amend its Business Plan. In that ruling, the ALJ also stated, "Finally, in its procedural email requesting an update on timing of ruling on its motion, SoCalGas mentioned direction from Commission staff with respect to supplementing the 2018 budget advice letter filings to reflect the updated energy savings goals. This supplemental advice letter filing may be an avenue for SoCalGas to pursue in the interim prior to further Commission direction with respect to updating the business plans, anticipated in the form of a decision in this proceeding."

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<sup>3</sup> On November 13, 2017, Administrative Law Judge (ALJ) Julie A. Fitch issued an e-mail ruling finding it reasonable for SoCalGas to file a Tier 3 AL to reflect updated energy savings goals and seek budget changes.

<sup>4</sup> D.14-10-046, p. 167.

<sup>5</sup> D.15-10-028, p. 56.

## **Compliance Items**

In compliance with the Budget Filing Appendices 2018 guidance provided by Energy Division,<sup>6</sup> this AL contains the requested details, as shown in Appendix A, including the following: (1) application summary tables with forecast budgets by sector and program; and (2) incorporation of reductions and/or increases in program or sector budgets.

Appendix A has been uploaded to the CEDARS website and will be made available on <http://www.socalgas.com/regulatory/R13-11-005.shtml>. Appendix B of this AL provides the CEDARS Filing Confirmation which was printed from the confirmation dashboard upon confirmed completion of the filing through CEDARS.

SoCalGas presents in this supplemental filing a single portfolio and budget which achieves the Commission's 1.25 threshold<sup>7</sup> for portfolio cost-effectiveness and the 2018 goals as established in D.17-09-025. Given the disproportionate impact of the 2018 goals update for natural gas energy efficiency, SoCalGas believes this approach is the most appropriate to meet the Commission's prospective portfolio requirements and goals set forth. Additionally, this supplemental filing provides comparative cost-effectiveness information, where appropriate, regarding the impact of the interim GHG adder in the avoided cost calculator to SoCalGas' September 1, 2017 filed portfolio and budget.

## **Program Funding Levels**

As was the case for the SoCalGas 2015 program year budget request and approved in D.14-10-046, the 2018 funding request does not include the program budget for the SoCalGas Statewide Marketing, Education & Outreach (ME&O) program, nor the 2018 program budget for the Statewide Financing Pilots. The program year 2018 budgets for these programs were approved in D.16-09-020 and D.13-09-044, respectively. Additionally, D.17-03-026 separated the Statewide Financing Pilots from the EE portfolio.

The Southern California Regional Energy Network (SoCalREN) is submitting its own AL to implement its programs and associated budget.<sup>8</sup> The SoCalREN budget shown in Table 1 reflects the funds originally authorized under D.14-10-046.

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<sup>6</sup> Amy Reardon, Energy Division: "Updated Budget Filing Appendices 2018," August 2, 2017, E-mail.

<sup>7</sup> See D.14-10-046 Section 3.9.1 Summary of Budget (pp. 104-109): "The TRC and PAC estimates are to exceed a 1.0 cost-effectiveness threshold for 2015: rather than the 1.25 we usually require, and will require for subsequent years."

<sup>8</sup> SoCalGas requests that the SoCalREN AL should be used as the source of information to reflect the SoCalREN 2018 energy efficiency portfolio/compliance filing.

**Table 1: 2018 EE Portfolio Budgets**

<b>Program Area</b>	<b>Total Funds</b> (\$000,s)
Residential	\$ 29,973
Commercial	\$ 12,812
Industrial	\$ 19,407
Agricultural	\$ 3,164
Codes and Standards	\$ 843
Financing	\$ 2,264
<b>Subtotal Statewide Resource programs</b>	<b>\$ 68,463</b>
Third Party Programs	\$ 16,376
State and Local Government Partnerships	\$ 4,846
<b>Subtotal Other Resource programs</b>	<b>\$ 21,222</b>
Emerging Technologies	\$ 1,272
Workforce, Education, and Training	\$ 3,129
Marketing, Education, and Outreach	N/A
Integrated Demand Side Management	\$ 582
Others	\$ 978
<b>Subtotal Statewide Non-Resource programs</b>	<b>\$ 5,962</b>
SoCalREN	\$ 4,337
<b>Total All Programs</b>	<b>\$ 99,984</b>
Evaluation, Measurement, and Verification	\$ 4,166
<b>Grand Total</b>	<b>\$ 104,150</b>
Notes:	
1. Minor difference exist by program area due to rounding	
2. Table does not include SW ME&O program funds authorized in D.16-09-020	
3. Table does not include SW Financing Pilots program funds authorized in D.13-09-044	

### Updates to SoCalGas' Portfolio Budget

SoCalGas' approved Energy Efficiency Portfolio budget for program years 2017 and prior was \$83.7 million.<sup>9</sup> The newly adopted savings goals in D.17-09-025 represents a significant increase to the 2018 energy savings goals for SoCalGas from 13.4 million net therms to 20.27 million net therms in 2018,<sup>10</sup> an increase of 54% compared to the

<sup>9</sup> As provided in D.15-10-028, SoCalGas' Business Plan budget represents its best estimates of spending for the life of the Business Plan. See D.15-10-028, p. 55.

<sup>10</sup> SoCalGas' net savings goals without Codes & Standards derived from incremental net market potential for the SoCalGas territory in the 2018 Potential Goal Study results viewer, retrieved at <ftp://ftp.cpuc.ca.gov/gopher->

projected savings contained in SoCalGas' 2018 portfolio budget, and a total increase of 62% over the life of the Business Plan for program years 2018 through 2025, filed January 17, 2017. As such, SoCalGas requests an increase of \$20.4 million in 2018 to accommodate the increase in energy efficiency activity needed to achieve the incremental potential identified in the newly adopted savings goals. Table 1 above reflects SoCalGas' proposed portfolio budget for program year 2018.

Additional program level budget detail is provided in Appendix A on the CEDARS website.

The changes in SoCalGas' amended budget are specifically made to the following sectors: Residential, Commercial, Industrial, and Evaluation, Measurement, and Verification (EM&V).<sup>11</sup>

### Residential Sector

SoCalGas seeks an increase to the Residential Sector budget of \$10 million in 2018 to support the 1.78 million net therm increase identified in the Energy Efficiency Potential and Goals Study for 2018 and Beyond (2018 Potential Study) when compared to SoCalGas' filed Business Plan.<sup>12</sup> The majority of increase in natural gas savings potential in the residential sector comes from the incorporation of behavior programs. According to the analysis conducted by Navigant in the 2018 Potential Study, this increase in natural gas savings potential will require approximately an additional \$20 million in funding for behavioral programs every year over the life of the Business Plan for program years 2018 through 2025. The analysis did not account for a transition from SoCalGas' current Advanced Meter Infrastructure (AMI) pilot program to a full program in the energy efficiency program portfolio. Currently, behavioral savings are funded through the SoCalGas Advanced Meter project, D.10-04-027, and upon completion of the Advanced Meter project at the end of 2017, SoCalGas will incorporate successful behavioral programs and techniques into the energy efficiency portfolio.

As a result of the learnings from SoCalGas' AMI behavior programs, SoCalGas believes that it can deliver residential behavior programs more cost-effectively than the analysis contained in the 2018 and Beyond Potential Goals and Study. In addition to the funding

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[data/energy\\_division/EnergyEfficiency/DAWG/2018\\_PG%20Study%20Results%20Viewer%20Final%20Public\\_092517.xlsx](ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/DAWG/2018_PG%20Study%20Results%20Viewer%20Final%20Public_092517.xlsx). See D.17-09-025 Section 2.1 Realistic, Aggressive Yet Achievable Goals regarding the use of market potential to set post 2017-goals (p. 7).

<sup>11</sup> Changes to EM&V are made to meet the Commission requirements set forth in D.14-10-046 which direct 4% of program administrators' budgets be set aside for EM&V.

<sup>12</sup> 2018 Residential sector savings target of 3.98 million net therms as identified in the total incremental market potential for SoCalGas of the 2018 Potential Goal Study results viewer, retrieved at [ftp://ftp.cpuc.ca.gov/gopher-data/energy\\_division/EnergyEfficiency/DAWG/2018\\_PG%20Study%20Results%20Viewer%20Final%20Public\\_092517.xlsx](ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/DAWG/2018_PG%20Study%20Results%20Viewer%20Final%20Public_092517.xlsx). 2018 Residential sector savings target of 2.80 million net therms. SoCalGas, Energy Efficiency Business Plan, p. 67.

required to implement residential energy efficiency behavior programs, SoCalGas also requests additional funding to achieve non-behavior increases in residential potential. The incremental budget will be used to fund additional energy efficiency appliance rebates as well as implement residential direct install activities targeted at moderate income customers, hard to reach customers, and disadvantaged communities.

### Commercial Sector

SoCalGas seeks an increase to the Commercial Sector budget of \$1 million in 2018 to support additional behavioral energy savings potential identified in the 2018 Potential Study.<sup>13</sup> To ensure the commercial sector goals are achieved, the funding will be used to further enhance commercial behavior programs such as the Building Operator Certification which trains and educates commercial building operators about how to save energy by encouraging them to adopt energy-efficient behaviors and make building changes that reduce energy use. SoCalGas' AMI will be a major component of this certification. The commercial behavior activities will be coordinated with Workforce Education & Training.

### Industrial Sector

The 2018 Potential Study identified an increase the industrial sector goals by more than 4.1 million net therms when compared to SoCalGas' Business Plan.<sup>14</sup> In order to achieve this increase in potential, SoCalGas will require an additional \$8.4 million in 2018. The additional industrial sector budget will support an increase in third-party programs for SoCalGas' industrial mining customers in an effort to address the challenges encountered by the mining industry. In addition to supporting the mining industry, the incremental industrial budget will be used to reengage small to medium customers to implement a comprehensive resource acquisition strategy to capture greater energy savings.

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<sup>13</sup> 2018 Commercial sector behavioral savings target of 0.50 million net therms as identified in the incremental behavioral potential for SoCalGas of the 2018 Potential Goal Study results viewer, retrieved at [ftp://ftp.cpuc.ca.gov/gopher-data/energy\\_division/EnergyEfficiency/DAWG/2018\\_PG%20Study%20Results%20Viewer%20Final%20Public\\_092517.xlsx](ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/DAWG/2018_PG%20Study%20Results%20Viewer%20Final%20Public_092517.xlsx).

<sup>14</sup> 2018 industrial and mining sector savings target of 9.27 million net therms as identified in the total incremental market potential for SoCalGas of the 2018 Potential Goal Study results viewer, retrieved at [ftp://ftp.cpuc.ca.gov/gopher-data/energy\\_division/EnergyEfficiency/DAWG/2018\\_PG%20Study%20Results%20Viewer%20Final%20Public\\_092517.xlsx](ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/DAWG/2018_PG%20Study%20Results%20Viewer%20Final%20Public_092517.xlsx). 2018 Industrial sector savings target (which incorporates savings from the mining sector) of 5.15 million net therms. SoCalGas, Energy Efficiency Business Plan, p. 159.

SoCalGas Portfolio Energy Savings, Cost-Effectiveness, and Budget Caps/Targets

SoCalGas provides its energy savings forecast and portfolio cost-effectiveness (Table 2) and budget and budget caps/targets (Table 3) below:

**Table 2: 2018 EE Portfolio Energy Savings Goals and Portfolio Cost-Effectiveness<sup>15</sup>**

<b>With Codes &amp; Standards</b>			
	Energy Savings	Cost-Effectiveness	
	Net (Therms)	TRC	PAC
2018 Budget Filing Forecast	53,392,638	1.87	4.66
D.17-09-025	46,000,000		
% Forecast of Goal	116%		

<b>Without Codes &amp; Standards</b>			
	Energy Savings	Cost-Effectiveness	
	Net (Therms)	TRC	PAC
2018 Budget Filing Forecast	22,603,330	1.37	1.75
D.17-09-025	20,000,000		
% Forecast of Goal	113%		

The SoCalGas Total Resource Cost (TRC) and Program Administrator Cost (PAC) cost-effectiveness results reflect the inclusion of the following inputs:

- Uses the new cost-effectiveness showings in CET version 18.1, released September 25, 2017 and includes the interim GHG adder.
- A 5% market effects adjustment applied to the portfolio, as directed by D.12-11-015, OP 37.
- General Rate Case (GRC) loaders associated with the EE program labor, as directed by D.12-11-015, Ordering Paragraph (OP) 39.<sup>16</sup>
- A projected shareholder incentive amount associated with the approved portfolio budget and projected therm savings activity. This assumption conforms to the

<sup>15</sup> Information provided in Table 2 is based on SoCalGas' proposed budget for program year 2018.

<sup>16</sup> On January 11, 2012, Energy Division conveyed ALJ Fitch's direction that the GRC costs are to be included in calculating the prospective portfolio budget administration cap.

methodology adopted in the Efficiency Savings and Performance Incentive (ESPI) Mechanism in D.13-09-023.

**Table 3: 2018 EE Portfolio Budget and Budget Caps/Targets<sup>17</sup>**

	<u>Budgets</u>						<u>Total Budget</u>
	<u>Admin</u>	<u>Marketing</u>	<u>Direct</u>	<u>Incentives</u>	<u>EM&amp;V</u>		
2018 EE Budget	\$ 9,271,372	\$ 5,755,116	\$ 38,376,677	\$ 42,243,408	\$ 4,166,000	\$	\$ 99,812,573
GRC Labor Loaders	\$ 5,578,957	\$ 150,700	\$ 1,099,653	\$ -	\$ -	\$	\$ 6,829,310
OBF Loan Pool						\$	\$ -
New Financing Pilots	\$ 223,132	\$ 238,898	\$ 559,211	\$ 776,346		\$	\$ 1,797,587
Statewide ME&O		\$ 2,104,539				\$	\$ 2,104,539
<b>Total EE Funding</b>						\$	<b>\$ 110,544,010</b>
SoCalREN						\$	\$ 4,337,000
<b>Total EE Funding w/SoCalREN</b>						\$	<b>\$ 114,881,010</b>
Parameter Type	<u>Cap</u>	<u>Target</u>	<u>Target</u>		<u>Budget</u>		
Cap / Target Level	\$ 10,146,564	\$ 5,755,116	\$ 28,178,981	\$ 42,243,408	\$ 4,166,000		
Total Budget for Calculation	\$ 110,544,010	\$ 110,544,010	\$ 110,544,010	\$ 110,544,010	\$ 104,149,573		
Cap / Target Percent	9%	5%	25%	38%	4%		
Cap / Targets	10%	6%	20%	60%	4%		

Pursuant to OP 13 of D.09-09-047, the Commission determined that administrative costs are limited to 10% of the total authorized energy efficiency budget, and ME&O costs have a budget target of 6% of the adopted portfolio budget. SoCalGas has calculated its portfolio caps and targets for its 2018 portfolio and included them in Table 3 above.

SoCalGas notes the following assumptions:

- Funding for the SoCalGas On-Bill Financing Program loan pool recovered in gas transportation rates is included, but does not impact the calculations because the adopted level for 2018 is zero.
- Pursuant to D.13-12-038, the Statewide ME&O program costs are excluded from the marketing budget target.
- According to the direction contained in PG&E's AL 3356-G/4176-E, SoCalGas excluded those program costs<sup>18</sup> identified by Energy Division to be exempt from the cap and target calculation.<sup>19</sup>

<sup>17</sup> Information provided in Table 3 is based on SoCalGas' proposed budget for program year 2018.

<sup>18</sup> Pursuant to Energy Division, programs exempt from Direct Implementation Non-Incentive Budget (DINI) costs target include non-resource programs or subprograms (i.e., Emerging Technologies, Workforce Education and Training, Lighting Market Transformation, local and statewide Integrated Demand Side Management, Continuous Energy Improvement, Strategic Energy Resources, and Ozone Laundry) and other exempt programs (i.e., Codes and

- D.14-10-046, as corrected by D.15-01-002, adopted a SoCalGas EM&V budget of \$4,166,000, which is 4% of the total budget.

SoCalGas will report the status of its budget caps and targets based on actual expenditures in its quarterly reports submitted through the Commission's CEDARS website.

### **Program Closures**

As part of SoCalGas' updated portfolio, SoCalGas plans to close the following programs in 2018, shown in Table 4. These programs have been in the market for two to three years without any significant market penetration. Given the dynamic changes in EE and the lack of market acceptance within each of the programs respective sub segment, these programs are no longer viable.

**Table 4: SoCalGas Program Closures for Program Year 2018**

<b>Program Number</b>	<b>Main Program Name/Sub-Program Name</b>	<b>Reason for Program Closure</b>
SCG3796	3P-IDEEA365-ODE for Campus Housing	Due to a new Commercial Recirculation Pump Control Workpaper, the savings for this program were significantly reduced, to the point where the program could no longer be delivered in a cost-effective manner.
SCG3797	3P-IDEEA365-Energy Advantage Program for Small Business	The results of the program showed that the program's identification of energy savings were significantly low compared to the program expenditures. The program has delivered below goal results with increasing costs and declining cost-effectiveness for the past two consecutive years, a trend which continued through 2017.
SCG3799	3P-IDEEA365-HBEEP	The scope of the Historic Building Energy Efficiency Program (HBEEP) encompassed the recruitment and enrollment of historic building home owners into energy efficiency rebate

Standards, and Finance programs), and non-resource DINI costs embedded in Government Partnerships.

<sup>19</sup> Disposition Approving PG&E's AL 3356-G/4176-E, at p. 5.



		and incentive programs (e.g., Home Upgrade/Advanced Home Upgrade Programs). As the Home Upgrade/advance Home Upgrade Programs ramp up, the HBEEP program will be incorporated and implemented as part of the Home Upgrade/Advanced Home Upgrade Programs.
SCG3800	3P-IDEEA365-Clear Ice	The program was intended to deliver gas savings from new and existing ice rinks but has not produced any projects since 2015. Since inception, the program has delivered below goal results with increasing costs.

### **Competitively-Bid Portfolio Programs to Third Party Vendors**

SoCalGas' proposed 2018 budget in Table 1 also includes \$34.3 million for competitively-bid third party implemented programs, which includes local third-party EE programs as well as third parties who implement SoCalGas' statewide EE programs. This constitutes 33% of the SoCalGas' total portfolio budget, which exceeds the Commission's current 20% requirement for competitively-bid programs.

### **September 1, 2017 filing Comparison**

The following portfolio energy savings and cost-effectiveness information regarding SoCalGas' September 1, 2017 filing have been provided in Table 5 identifying the impacts of the interim GHG adder in the avoided cost calculator update directed in D.17-08-022. While the portfolio and budget information of the September 1, 2017 filing meets the Commission's TRC threshold of 1.25 without codes and standards,<sup>20</sup> savings achieved are forecasted to be below the updated 2018 goals. This showing is provided for informational purposes only.

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<sup>20</sup> Energy Division Letter, p. 1.

**Table 5: September 1, 2017 Filing Information on 2018 EE Portfolio Energy Savings Goals and Portfolio Cost-Effectiveness**

<b>With Codes &amp; Standards</b>			
	Energy Savings	Cost-Effectiveness	
	Net (Therms)	TRC	PAC
2018 Budget Filing Forecast	47,968,816	1.91	5.37
D.17-09-025	46,000,000		
% Forecast of Goal	104%		

<b>Without Codes &amp; Standards</b>			
	Energy Savings	Cost-Effectiveness	
	Net (Therms)	TRC	PAC
2018 Budget Filing Forecast	17,179,508	1.34	1.74
D.17-09-025	20,000,000		
% Forecast of Goal	86%		

The SoCalGas TRC and PAC cost-effectiveness results reflect the inclusion of the following inputs:

- Uses the new cost effectiveness showings in CET version 18.1, released September 25, 2017 and includes interim GHG adder.
- A 5% market effects adjustment applied to the portfolio, as directed by D.12-11-015, OP 37.
- GRC loaders associated with the EE program labor, as directed by D.12-11-015, OP 39.<sup>21</sup>
- A projected shareholder incentive amount associated with the approved portfolio budget and projected therm savings activity. This assumption conforms to the methodology adopted in the ESPI Mechanism in D.13-09-023.

### **Revenue Requirements**

The table below summarizes the revenue requirement impact by class of service. In addition, SoCalGas provides herein as Appendix B the Gas Bill Payer Impacts table comparing present and proposed rates associated with the inclusion of SoCalGas' proposed 2018 budget in its gas transportation rates.

**Table 6: Revenue Requirement by Customer Class**

<b>Customer Class</b>	<b>Applicable Rate</b>	<b>Increase/(Decrease)</b>
-----------------------	------------------------	----------------------------

<sup>21</sup> On January 11, 2012, Energy Division conveyed ALJ Fitch's direction that the GRC costs are to be included in calculating the prospective portfolio budget administration cap.

	<b>Schedules</b>	<b>(\$000s)</b>
Core	GR, GS, GM, GO-AC, G-NGVR, GL, G-10, G-AC, G-EN, G-NGV	\$17,157
Non-Core	GT-NC, GT-TLS	\$1,421
<b>Total</b>		<b>\$18,578</b>

### **Protests**

Anyone may protest this AL to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this AL, which is December 12, 2017. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
Attn: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). A copy of the protest should also be sent via both mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Ray B. Ortiz  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: [ROrtiz@SempraUtilities.com](mailto:ROrtiz@SempraUtilities.com)

### **Effective Date**

In accordance with the Energy Division letter, this AL is designated as Tier 3 pursuant to General Order (GO) 96-B and, as such, requires a Commission resolution to approve. SoCalGas respectfully requests that this AL be approved by the Commission at the earliest opportunity, and made effective on October 2, 2017, which is 30 days from the date AL 5183 was filed.

**Notice**

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for R.13-11-005 and A.17-01-013, et. al. Address change requests to the GO 96-B service list should be directed by electronic mail to [tariffs@socalgas.com](mailto:tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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Ronald van der Leeden  
Director – Regulatory Affairs

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Ray B. Ortiz

Phone #: (213) 244-3837

E-mail: [ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 5183-A

Subject of AL: Supplement - Southern California Gas Company Request for Approval of Annual Energy Efficiency Budget Filing for Program Year 2018

Keywords (choose from CPUC listing): Energy Efficiency

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.17-09-025, D.09-09-047

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: 10/2/17

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division

Attention: **Tariff Unit**

505 Van Ness Ave.,

San Francisco, CA 94102

[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Southern California Gas Company

Attention: **Ray B. Ortiz**

555 West 5<sup>th</sup> Street, GT14D6

Los Angeles, CA 90013-1011

[ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)

[Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

<sup>1</sup> Discuss in AL if more space is needed.

## **APPENDIX A**

### **Advice No. 5183-A**

- Table 1: Bill Payer Impacts - Rates by Customer Class**
- Table 2a: Electric Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class**
- Table 2b: Gas Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class**
- Table 3: Budget and Cost Recovery by Funding Source**
- Table 4: Budget, Spent, Unspent, Carryover Details**
- Table 5: Total 2018 Requested and 2013-2017 Authorized Budgets**
- Table 6: Committed Energy Efficiency Program Funding Not Yet Spent**
- Table 7: 2016 Authorized and Spent/Unspent Detail**

PA Name: Southern California Gas Company  
 Budget Year: 2018

Table 1: Bill Payer Impacts - Rates by Customer Class

	Electric Average Rate (Res and Non-Res) \$/kwh	Gas Average Rate (Res and Non-Res) \$/therm	Total Average Bill Savings by Year (\$)	Total Average Lifecycle Bill Savings (\$)
<b>Present Rates - System Average</b>				
2013	\$ -	\$ 0.97	\$ 25,170,200	\$ 254,241,085
2014	\$ -	\$ 1.16	\$ 31,505,918	\$ 338,528,091
2015	\$ -	\$ 1.16	\$ 29,661,771	\$ 187,282,582
2016	\$ -	\$ 1.10	\$ 39,684,666	\$ 187,073,863
2017	\$ -	\$ 1.10	\$ 41,798,315	\$ 342,082,144
<b>2018</b>	<b>\$ -</b>	<b>\$ 1.16</b>	<b>\$ 75,659,548</b>	<b>\$ 487,708,103</b>

[1] Average first year gas bill savings is calculated by multiplying an average gas rate with first year gross therm energy savings.

[2] Total Average Bill Savings by Year includes C&S and ESA Programs.

[3] Total Average Lifecycle Bill Savings does not include C&S and ESA programs.

[4] Total Average Lifecycle Bill Savings does not include C&S programs for 2016.

[5] Average lifecycle gas bill savings is calculated by multiplying an average gas rate with lifecycle gross therm energy savings.

[6] Forecasted savings for 2013-2015 savings are taken from the 2015 energy efficiency annual report.

[7] Forecasted savings for 2016 savings are taken from the 2016 energy efficiency annual report.

Table 2a: Electric Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class

Customer Classes	2016 Total Electric Annual Revenue \$000	2016 Energy Efficiency Portion of Total Electric Annual Revenue \$000	2017 Energy Efficiency Portion of Total Electric Annual Revenue \$000	2018 Proposed Energy Efficiency Electric Annual Revenue Change \$000	2018 Proposed Percentage Change In Electric Revenue and Rates	2016 Electric Average Rate \$/kwh	2016 Energy Efficiency Portion of Electric Average Rate \$/kwh	2017 Electric Average Rate \$/kwh	2017 Energy Efficiency Portion of Electric Average Rate \$/kwh	2018 Proposed Electric Average Rate Change \$/kwh	2018 Proposed Percentage Change In Electric Revenue and Rates
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Table 2b: Gas Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class

Customer Classes	2016 Total Gas Annual Revenue \$000	2016 Energy Efficiency Portion of Total Gas Annual Revenue \$000	2017 Energy Efficiency Portion of Total Gas Annual Revenue \$000	2018 Proposed Energy Efficiency Gas Annual Revenue Change \$000	2018 Proposed Percentage Change In Gas Revenue and Rates	2016 Gas Average Rate \$/Therm	2016 Energy Efficiency Portion of Gas Average Rate \$/Therm	2017 Gas Average Rate \$/Therm	2017 Energy Efficiency Portion of Gas Average Rate \$/Therm	2018 Proposed Gas Average Rate Change \$/Therm	2018 Proposed Percentage Change In Gas Revenue and Rates
Residential	\$ 218,385	\$ 33,837	\$ 33,890	\$ 41,183	21.5%	\$ 0.09955	\$ 0.01542	\$ 0.09842	\$ 0.01491	\$ 0.00300	3.0%
Core Commercial/Industrial	\$ 69,289	\$ 44,276	\$ 44,345	\$ 53,888	21.5%	\$ 0.07127	\$ 0.04554	\$ 0.07134	\$ 0.04388	\$ 0.00943	13.2%
Gas Air Conditioning	\$ 84	\$ 64	\$ 64	\$ 77	21.5%	\$ 0.10142	\$ 0.07720	\$ 0.10906	\$ 0.08260	\$ 0.01778	16.3%
Gas Engine	\$ 1,261	\$ 851	\$ 852	\$ 1,036	21.5%	\$ 0.07518	\$ 0.05073	\$ 0.06834	\$ 0.04117	\$ 0.00886	13.0%
Non-Core Commercial/Industrial	\$ 43,188	\$ 6,544	\$ 6,555	\$ 7,965	21.5%	\$ 0.02811	\$ 0.00426	\$ 0.03042	\$ 0.00433	\$ 0.00093	3.1%

[1] Proposed Change in Annual Revenue for Energy Efficiency programs as compared to current Energy Efficiency Revenue by customer class.  
 [2] Represents the change in the amounts collected through the Public Purpose Program Surcharge for Energy Efficiency.  
 [3] Proposed Change in the Energy Efficiency Component of the Public Purpose Program Surcharge by customer class.  
 [4] Represents the % change in the Energy Efficiency component of the Public Purpose Program Surcharge.  
 [5] Proposed revenue and rate changes compare to total revenues and rates effective January 1, 2017.  
 [6] Values shown associated with proposed 2018 SoCalGas EE budget to be collected in rates only. Does not include statewide ME&O budget.



PA Name: Southern California Gas Company  
 Budget Year: 2018

Table 3: Budget and Cost Recovery by Funding Source

	2018
2018 EE Portfolio Budget	\$ 104,149,573
Unspent/Uncommitted EM&V Carryover Funds from 2016	\$ -
Unspent/Uncommitted Program Carryover Funds from 2016	\$ -
<b>Total Funding Request for 2018 EE Portfolio</b>	<b>\$ 104,149,573</b>

Budget by Funding Source

2018 Authorized (Before Carryover)	2018 Budget	Allocation
Electric Procurement EE Funds	\$ -	
Gas PPP Surcharge Funds	\$ 104,149,573	100%
<b>Total Funds</b>	<b>\$ 104,149,573</b>	

Revenue Requirement for Cost Recovery by Funding Source

2018 Authorized Funding in Rates (including 2015 carryover)	2018 Revenue Requirement	Allocation after Carryover adjustment
Electric Procurement EE Funds	\$ -	\$ -
Gas PPP Surcharge Funds	\$ 104,149,573	\$ 104,149,573
<b>Total Funds</b>	<b>\$ 104,149,573</b>	<b>\$ 104,149,573</b>

Unspent/Uncommitted Carryover Funds (in positive \$ amounts)

Total Unspent/Uncommitted Funds	Electric PGC	Electric		Gas	Total
		Procurement	Total Electric		
2016				\$ -	\$ -
2013-2015				\$ -	\$ -
<b>Total Pre-2016</b>				<b>\$ -</b>	<b>\$ -</b>

EM&V Unspent/Uncommitted Funds	Electric PGC	Electric		Gas	Total
		Procurement	Total Electric		
2016				\$ -	\$ -
2013-2015				\$ -	\$ -
<b>Total Pre-2016</b>				<b>\$ -</b>	<b>\$ -</b>

Program Unspent/Uncommitted Funds	Electric PGC	Electric		Gas	Total
		Procurement	Total Electric		
2016				\$ -	\$ -
2013-2015				\$ -	\$ -
<b>Total Pre-2016</b>				<b>\$ -</b>	<b>\$ -</b>



**PA Name: Southern California Gas Company**  
**Budget Year: 2018**

**Table 5: Total 2018 Requested and 2013-2017 Authorized Budgets (\$000)**

Category (2013-17 Authorized <sup>1</sup> and 2018 Request)	Electric Demand Response Funds	Electric Energy Efficiency Funds	Natural Gas Public Purpose Funds	Total Energy Efficiency Funds
2013-2015 Annualized Program Funds - Utility			\$ 79,470	\$ 79,470
2013-2015 Annualized Program Funds - REN			\$ 4,390	\$ 4,390
2013-2015 Annualized Program Funds - CCA			\$ -	\$ -
2013-2015 Annualized EM&V			\$ 3,550	\$ 3,550
<b>2013-2015 Total Annualized Portfolio</b>			<b>\$ 87,410</b>	<b>\$ 87,410</b>
2016 Program Funds - Utility			\$ 76,019	\$ 76,019
2016 Program Funds - REN			\$ 4,337	\$ 4,337
2016 Program Funds - CCA			\$ -	\$ -
2016 EM&V			\$ 3,348	\$ 3,348
<b>2016 Annualized Total</b>			<b>\$ 83,704</b>	<b>\$ 83,704</b>
2017 Program Funds - Utility			\$ 76,019	\$ 76,019
2017 Program Funds - REN			\$ 4,337	\$ 4,337
2017 Program Funds - CCA			\$ -	\$ -
2017 EM&V			\$ 3,348	\$ 3,348
<b>2017 Annualized Total</b>			<b>\$ 83,704</b>	<b>\$ 83,704</b>
2018 Requested Program Funds - Utility			\$ 95,647	\$ 95,647
2018 Requested Program Funds - REN			\$ 4,337	\$ 4,337
2018 Requested Program Funds - CCA			\$ -	\$ -
2018 Requested EM&V			\$ 4,166	\$ 4,166
<b>2018 Total Portfolio Request</b>			<b>\$ 104,150</b>	<b>\$ 104,150</b>

[1] Authorized budget excludes reductions from past unspent funds, carryover and is consistent with funding approved in D. 09-09-047, D. 12-11-015, D.14-10-046 and D.15-10-028.

**PA Name: Southern California Gas Company**  
**Budget Year: 2018**

**Table 6: Committed Energy Efficiency Program Funding Not Yet Spent**

<b>Committed funds not yet spent (\$000)</b>	<b>Electric Procurement Funds</b>	<b>Natural Gas Public Purpose Funds</b>	<b>Total</b>
<b>Category</b>			
2013-2015 EM&V Funds		\$ 7,372	\$ 7,372
2013-2015 Program Funds - Utility		\$ 56,522	\$ 56,522
2013-2015 Program Funds - REN		\$ 6,197	\$ 6,197
2013-2015 Program Funds - CCA		\$ -	\$ -
2016 EM&V Funds		\$ 87	\$ 87
2016 Program Funds - Utility		\$ 3,171	\$ 3,171
2016 Program Funds - REN		\$ (2,390)	\$ (2,390)
2016 Program Funds - CCA		\$ -	\$ -
2017 to date EM&V Funds		\$ 1,871	\$ 1,871
2017 to date Program Funds - Utility		\$ 51,039	\$ 51,039
2017 to date Program Funds - REN		\$ (6,704)	\$ (6,704)
2017 to date Program Funds - CCA		\$ -	\$ -
<b>Total</b>		\$ 117,165	\$ 117,165

**PA Name: Southern California Gas Company**  
**Budget Year: 2018**

**Table 7: 2016 Authorized and Spent/Unspent Detail**

<b>Authorized, spent and unspent program funds (excludes EM&amp;V) (\$000)</b>	<b>Electric Procurement Funds</b>	<b>Natural Gas Public Purpose Funds</b>	<b>Total</b>
<b>Category</b>			
2016 Annualized Authorized Program Budget		\$ 80,356	\$ 80,356
2016 Actual Spent		\$ 79,574	\$ 79,574
2016 Unspent			
2016 Committed funds		\$ 782	\$ 782
2016 Unspent/uncommitted - estimated available for 2018		\$ -	\$ -

**APPENDIX B**

**Advice No. 5183-A**

**CEDARS Filing Submission Receipt**

CEDARS FILING SUBMISSION RECEIPT

The SCG portfolio filing has been submitted and is now under review. A summary of the filing is provided below.

PA: Southern California Gas (SCG)

Filing Year: 2018

Submitted: 18:50:11 on 21 Nov 2017

By: Paul Deang

Advice Letter Number: 5183-A

\* Portfolio Filing Summary \*

- TRC: 1.874
- PAC: 4.6576
- TRC (no admin): 2.5227
- PAC (no admin): 12.9066
- RIM: 4.6576
- Budget: \$99,812,573.28

\* Programs Included in the Filing \*

- SCG3701: RES-Energy Advisor
- SCG3702: RES-Plug Load and Appliances
- SCG3703: RES-Plug Load and Appliances - POS
- SCG3704: RES-MFEER
- SCG3705: RES-Home Upgrade Program
- SCG3706: RES-Residential HVAC
- SCG3707: RES-RNC
- SCG3708: COM-Energy Advisor
- SCG3709: COM-CEI
- SCG3710: COM-Calculated Incentives
- SCG3711: COM-Deemed Incentives
- SCG3712: COM-NonRes HVAC
- SCG3713: IND-Energy Advisor
- SCG3714: IND-CEI
- SCG3715: IND-Calculated Incentives
- SCG3716: IND-Deemed Incentives
- SCG3717: AG-Energy Advisor

- SCG3718: AG-CEI
- SCG3719: AG-Calculated Incentives
- SCG3720: AG-Deemed Incentives
- SCG3721: ET-Technology Development Support
- SCG3722: ET-Technology Assessment Support
- SCG3723: ET-Technology Introduction Support
- SCG3724: C&S-Building; Codes & Compliance Advocacy
- SCG3725: C&S-Appliance; Standards Advocacy
- SCG3726: C&S-Compliance; Enhancement
- SCG3727: C&S-Reach; Codes
- SCG3728: C&S-Planning; Coordination
- SCG3729: WE&T-Centergies;
- SCG3730: WE&T-Connections;
- SCG3731: WE&T-Strategic; Planning
- SCG3733: SW-ME&O-ME;&O;
- SCG3734: IDSM-IDSM
- SCG3735: FIN-On-Bill Financing
- SCG3736: FIN-ARRA-Originated Financing
- SCG3737: FIN-New Financing Offerings
- SCG3738: LInstP-CA Department of Corrections Partnership
- SCG3739: LInstP-California Community College Partnership
- SCG3740: LInstP-UC/CSU/IOU Partnership
- SCG3741: LInstP-State of CA/IOU Partnership
- SCG3742: LGP-LA Co Partnership
- SCG3743: LGP-Kern Co Partnership
- SCG3744: LGP-Riverside Co Partnership
- SCG3745: LGP-San Bernardino Co Partnership
- SCG3746: LGP-Santa Barbara Co Partnership
- SCG3747: LGP-South Bay Cities Partnership
- SCG3748: LGP-San Luis Obispo Co Partnership
- SCG3749: LGP-San Joaquin Valley Partnership
- SCG3750: LGP-Orange County Cities Partnership
- SCG3751: LGP-SEEC Partnership
- SCG3753: LGP-Desert Cities Partnership
- SCG3754: LGP-Ventura County Partnership
- SCG3755: LGP-Local Government Energy Efficiency Pilots
- SCG3757: 3P-Small Industrial Facility Upgrades
- SCG3758: 3P-PREPPS
- SCG3759: 3P-On Demand Efficiency
- SCG3760: 3P-HERS Rater Training Advancement
- SCG3762: 3P-CLEO
- SCG3763: 3P-MF Direct Therm Savings



- SCG3764: 3P-LivingWise
- SCG3765: 3P-Manufactured Mobile Home
- SCG3768: 3P-CA Sustainability Alliance
- SCG3769: 3P-PoF
- SCG3770: 3P-PACE
- SCG3771: 3P-Innovative Designs for Energy Efficiency Activities (IDEEA365)
- SCG3772: EM&V-Evaluation; Measurement & Verification
- SCG3773: LGP-New Partnership Programs
- SCG3774: LGP-LG Regional Resource Placeholder
- SCG3775: CRM
- SCG3776: LGP-Gateway Cities Partnership
- SCG3777: LGP-San Gabriel Valley COG Partnership
- SCG3779: LGP-West Side Community Energy Partnership
- SCG3783: LGP-Western Riverside Energy Partnership
- SCG3793: 3P-IDEEA365-Instant Rebates! Point-of-Sale Foodservice Rebate Program
- SCG3798: 3P-IDEEA365-Connect
- SCG3801: LGP-North Orange County Cities Partnership
- SCG3802: LGP-San Bernardino Regional Energy Partnership
- SCG3803: SW-FIN-California Hub for EE Financing
- SCG3804: 3P-IDEEA365-On-Premise Ozone Laundry
- SCG3805: SW-COM-Direct Install Program
- SCG3806: Water AMI Pilot
- SCG3807: COM-HOPPS-CRR Program
- SCG3808: RES-HOPPS-CWHMBS Program
- SCG3809: COM-AB793-CEMTL Program
- SCG3810: RES-AB793-REMTS Program
- SCG-ESAP: Energy Savings Assistance Program
- SCG-ESPI: ESPI Incentives
- SCG-GRCL: GRC Labor Loaders

# ATTACHMENT A

## Confidentiality Justification for Protected Information as Provided in the Response

(Confidential Protected Information provided in the documents in response to this data request have been marked/highlighted)

Location of Data	Description of Data	Legal Citations	Narrative Justification
Information highlighted in e-mails and documents contained in Response 2 to data request CalAdvocates-SC-SCG-2020-01.	SoCalGas' employee names, titles, and contact information.	<p>CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")</p> <p><i>Britt v. Superior Court</i>, 20 Cal. 3d 844, 855-856 (1978) (even highly relevant information may be shielded from discovery if its disclosure would impair a person's inalienable right of privacy provided by the California Constitution)</p> <p>CPRA Exemption, Gov't Code § 6255(a) (Balancing Test)</p>	<p>Disclosing employee names in conjunction with other identifying information such as e-mail addresses and telephone numbers could pose a risk to employee safety. Additionally, disclosure of such information increases the risks of cyber attacks, incessant robo-calls, targeted calls, and malicious emails. These risks are further increased where, as here, there is a history of employee names and contact information being shared with the public and/or media.</p>

**CONFIDENTIALITY DECLARATION OF  
BRIAN PRUSNEK**

**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF BRIAN PRUSNEK  
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.17-09-023**

I, Brian C. Prusnek, do declare as follows:

1. I am the Director, Customer Programs & Assistance for Southern California Gas Company (“SoCalGas”). I have reviewed the confidential information included within SoCalGas’s response to the data request CalAdvocates-SC-SCG-2020-01. I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 17-09-023 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the data request response, is within the scope of data protected as confidential under applicable law.

3. In accordance with the narrative justification described in Attachment A below, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 4<sup>th</sup> day of September 2020, at Los Angeles.



\_\_\_\_\_  
Brian C. Prusnek  
Director, Customer Programs & Assistance  
Southern California Gas Company

# ATTACHMENT A

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