

Exhibit No: SCG-07
Docket No.: R.13-11-005
Witness: Cross-Exhibit



PUBLIC ADVOCATES OFFICE DATA REQUEST

ORA-HB-SCG-2018-09

June 29, 2018



ORA

Office of Ratepayer Advocates
California Public Utilities Commission

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ORA DATA REQUEST No. ORA-HB-SCG-2018-09

Date: June 29, 2018

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Re: Data Request No. ORA-HB-SCG-2018-09

Response Requested: **Friday, July 13, 2018**

INSTRUCTIONS

You are instructed to answer the following Data Requests 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 ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. 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 ORA 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.

As to any Data Request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate Data Request.

If a request, definition, or an instruction, is unclear, notify ORA 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 ORA 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 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present”

should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- 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

1. How many hours did SoCalGas personnel spend on energy efficiency codes and standards (EECS) advocacy activities from June 1, 2018 to June 5, 2018?
2. How many hours have SoCalGas personnel spent on EECS advocacy activities on or after June 6, 2018?
3. How many SoCalGas personnel were involved in EECS advocacy activities from June 1, 2018 to June 5, 2018?
4. How many SoCalGas personnel have been involved in EECS advocacy activities on or after June 6, 2018?
5. Please describe the areas (subject matter and goals) in which SoCalGas performed work on EECS advocacy from June 1, 2018 to June 5, 2018.

6. Please describe the areas (subject matter and goals) in which SoCalGas has performed work on EECS advocacy on or after June 6, 2018.
7. Please describe the specific activities SoCalGas performed related to EECS advocacy from June 1, 2018 to June 5, 2018.
8. Please describe the specific activities SoCalGas has performed related to EECS advocacy on or after June 6, 2018.
9. Please provide the total Company-wide costs that SoCalGas has incurred related to EECS advocacy activities performed from June 1, 2018 to June 5, 2018. Please disaggregate the total into the following categories by the source of funding:
 - a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts
 - b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources
 - c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources
10. Please provide the total Company-wide costs that SoCalGas has incurred related to EECS advocacy activities performed on or after June 6, 2018. Please disaggregate the total into the following categories by the source of funding:
 - a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts
 - b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources
 - c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources
11. Of the total from question 9(a), disaggregate these expenses into the following categories:
 - a. Labor costs
 - b. Employee expenses
 - c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.
12. Of the total from question 10(a), disaggregate these expenses into the following categories:
 - a. Labor costs
 - b. Employee expenses
 - c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.
13. Please provide any and all *final* or *draft* work products of EECS advocacy activities performed from June 1, 2018 through June 5, 2018. This should include documents that were written,

partially written, revised, finalized, or sent on the days in question. Work products include, but are not limited to:

- a. Letters, comments, and testimony submitted to regulatory agencies
 - b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
 - c. Fliers, articles, and press releases
 - d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.
14. Please provide any and all *final* or *draft* work products of EECS advocacy activities performed on or after June 6, 2018. This should include documents that were written, partially written, revised, finalized, or sent on or after June 6, 2018. Work products include, but are not limited to:
- a. Letters, comments, and testimony submitted to regulatory agencies
 - b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
 - c. Fliers, articles, and press releases
 - d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.
15. Please provide any written or electronic correspondence with other investor-owned utilities in California regarding EECS advocacy that was sent or received on or after June 1, 2018.
16. Please provide information about any phone conversations or in-person meetings with other investor-owned utilities in California that were related to EECS advocacy, and occurred on or after June 1, 2018.
- a. Date and time
 - b. Name and title of all people involved
 - c. Subject matter and purpose of the meeting

END OF REQUEST