

Exhibit No: SCG-10
Docket No.: R.13-11-005
Witness: Cross-Exhibit



PUBLIC ADVOCATES OFFICE DATA REQUEST

CALADVOCATES-HB-SCG-2019-01

January 16, 2019



Public Advocates Office
California Public Utilities Commission

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No. CalAdvocates-HB-SCG-2019-01

Date: January 16, 2019

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Re: Data Request No. CalAdvocates-HB-SCG-2019-01

Response Requested: **Wednesday, January 30, 2019**

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 Public Advocates Office (Cal Advocates) contact(s) above with a copy to the Public Advocates Office's 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 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 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

This data request seeks clarification of certain information about SoCalGas' involvement in energy efficiency codes and standards (EECS) advocacy. For the purposes of this data request, EECS advocacy includes any and all advocacy to *local, state, or federal* bodies that is related to appliance standards or building codes.

1. In response to Question 20 of Public Advocates Office Data Request Cal-Advocates-HB-SCG-2018-13, which requested information about Michelle Sim's participation in the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) between June 6 and December 10, 2018, SoCalGas stated that Michelle Sims spent 0.5 hours related to her participation in ASRAC and that the total of 0.5 hours "was funded out of other ratepayer funds." Please identify to which ratepayer-funded account (or accounts) Ms. Sim charged her time dedicated to ASRAC.
2. In response to Question 16 (Tab M) of Public Advocates Office Data Request Cal-Advocates-HB-SCG-2018-13, SoCalGas stated that three employees (George Minter, Allison Smith, and Tanya Peacock) participated in a June 26, 2018 conference call related to building decarbonization.
 - a) SoCalGas states that employees spent 0.3 hours preparing for this meeting, 1.5 hours in the meeting, and 0.5 hours on follow-up activities. Do these amounts reflect the time spent per employee or the combined number of person-hours for the three employees?
 - b) SoCalGas states that the time employees dedicated to this meeting was charged to ratepayer funds other than EE balancing accounts. Please identify which ratepayer-funded account (or accounts) this time was charged to.
3. Please describe any meetings or phone conversations, related to EECS, that SoCalGas Director Dan Rendler may have had with his managerial counterparts at other California Investor-Owned Utilities from June 20, 2018 through June 30, 2018. For each such interaction, please characterize the subject matter and purpose of the meeting and identify the date and time, duration, and participants (including name and employer).
4. In response to Question 12 of Public Advocates Office Data Request ORA-HB-SCG-2018-09, SoCalGas listed as a cost incurred by SoCalGas and charged to energy efficiency balancing accounts "approximately \$4,662 (Negawatt consulting)." Was the "approximately \$4,662" paid to Negawatt for services performed solely for SoCalGas?
5. In response to questions in Public Advocates Office Data Request Cal-Advocates-HB-SCG-2013-13, SoCalGas provided a spreadsheet that included estimated amounts of time that Bo White, Senior Project Engineer, performed work that SoCalGas charged to energy efficiency balancing accounts (see Tab E, line 5; Tab F, line 5, and Tab G, line 5).

Was Mr. White's time that SoCalGas charged to energy efficiency balancing accounts, as shown in SoCalGas's excel spreadsheet submitted in response to Public Advocates Office Data Request Cal-Advocates-HB-SCG-2013-13, for services that Mr. White performed solely for SoCalGas?

6. Question 7 of Public Advocates Office Data Request No EF-SCG-2018-11-01 requested a list of all advocacy groups, trade organizations, and other membership organizations in which SoCalGas has participated since January 1, 2014, and any membership dues or donations that SoCalGas has paid to each of the groups since January 1, 2014, listed by value and date. In response to question 7, SoCal Gas provided two Excel spreadsheets that included dues paid and/or donations that SoCalGas made to the following groups:
 - ... American Gas Association,
 - ... American Public Gas Association,
 - ... Gas Technology Institute, and
 - ... American Institute for an Energy Efficiency Economy.
 - a) For each Excel spreadsheet line item of the dues paid and/or donations that SoCalGas made to these groups, please list the source(s) of the funding: energy efficiency funds; other ratepayer funds; or shareholder funds.
 - b) If other ratepayer funds were used, please indicate the specific account.

END OF REQUEST