

Exhibit No: SCG-12  
Docket No.: R.13-11-005  
Witness: Cross-Exhibit



**SOCALGAS RESPONSE TO PUBLIC ADVOCATES**  
**OFFICE DATA REQUEST ORA-HB-SCG-2018-09**

July 16, 2018

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST**  
**(DATA REQUEST ORA-HB-SCG-2018-09)**

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**Preliminary Statement**

For the purposes of these responses, SoCalGas understands the phrase “energy efficiency codes and standards advocacy” to mean conduct directly concerning statewide energy efficiency codes & standards advocacy, as delineated in Decision 18-05-041. The activities therefore do not include activities for local programs, such as compliance, reach codes, and engagement with the Department of Energy (“DOE”). See Decision (D.) 18-05-041 at 12, 91; SoCalGas Business Plan at 298, PG&E Business Plan at 548, Southern California Edison Business Plan at 224. In addition, SoCalGas has continued to monitor and be passively involved with statewide energy efficiency Codes & Standards advocacy. Therefore, the time, work, and personnel identified in the below responses include instances where SoCalGas employees were, for example, not “participating” in energy efficiency codes and standards (EECS) advocacy, but were merely present for a call. This understanding applies to all responses below unless it is stated otherwise.

**QUESTION 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?

**RESPONSE 1:**

SoCalGas employees spent approximately 2 hours during the identified time period.

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**QUESTION 2:**

How many hours have SoCalGas personnel spent on EECS advocacy activities on or after June 6, 2018?

**RESPONSE 2:**

SoCalGas employees spent approximately 10.5 hours during the identified time period.

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**QUESTION 3:**

How many SoCalGas personnel were involved in EECS advocacy activities from June 1, 2018 to June 5, 2018?

**RESPONSE 3:**

SoCalGas had 1 employee spend time on such activities.

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**QUESTION 4:**

How many SoCalGas personnel have been involved in EECS advocacy activities on or after June 6, 2018?

**RESPONSE 4:**

SoCalGas has 1 employee who spent time on such activities.

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**QUESTION 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.

**RESPONSE 5:**

1. SoCalGas was on a call with the other IOUs regarding dedicated purpose pool pump standards (an electric standard). SoCalGas did not provide any feedback or comments to the IOUs or otherwise on the standards.
2. SoCalGas communicated with representatives from the Los Angeles Department of Water and Power (LADWP) regarding the contract whereby LADWP pays for statewide lighting codes & standards efforts. It was explained to LADWP that PG&E will lead this particular statewide activity going forward.

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**QUESTION 6:**

Please describe the areas (subject matter and goals) in which SoCalGas has performed work on EECS advocacy on or after June 6, 2018.

**RESPONSE 6:**

1. SoCalGas was involved in an IOU conference call discussing the implementation of the 2019 Title 24 standards. The IOUs pooled resources from each utility to consider using internally for training (thereby saving potential consultant costs for training and implementation).
2. SoCalGas provided comments on a draft Hearth Products CASE report as a follow-up to a previous request.
3. SoCalGas communicated with representatives from the LADWP regarding the contract whereby LADWP pays for statewide lighting codes & standards efforts. It was explained to LADWP that PG&E will lead this particular statewide activity going forward.
4. SoCalGas was present for, but did not participate in, a conference call with the IOUs regarding electric standards for portable air conditioners.
5. SoCalGas was present for, but did not participate in, a conference call with the IOUs regarding electric standards for fans.

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**QUESTION 7:**

Please describe the specific activities SoCalGas performed related to EECS advocacy from June 1, 2018 to June 5, 2018.

**RESPONSE 7:**

For the work described in Question 5, SoCalGas attended conference calls, and reviewed email correspondence.



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**QUESTION 8:**

Please describe the specific activities SoCalGas has performed related to EECS advocacy on or after June 6, 2018.

**RESPONSE 8:**

For the work described in Question 6, SoCalGas attended conference calls, provided comments on a draft CASE study, and reviewed email correspondence.

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**QUESTION 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

**RESPONSE 9:**

SoCalGas objects to the term “related to” as vague, ambiguous, and overbroad. SoCalGas understands the term to mean direct costs that are attributed to specific work in statewide energy efficiency Codes & Standards advocacy. Costs such as allocated overheads are therefore excluded. Subject to this objection, and the above understanding, SoCalGas incurred the following costs:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts: SoCalGas has charged or expects to charge approximately **\$223** to energy efficiency balancing accounts for the work done on statewide EECS during this time period.
- b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources: **\$0**
- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources: **\$0**

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**QUESTION 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

**RESPONSE 10:**

SoCalGas also objects to the term “related to” as vague, ambiguous, and overbroad. SoCalGas understands the term to mean direct costs that are attributed to specific work in statewide energy efficiency Codes & Standards advocacy. Costs such as allocated overheads are therefore excluded. Subject to this objection, and the above understanding, SoCalGas incurred the following costs:

- a. Costs that SoCalGas has charged, or expects to charge, to energy efficiency (EE) balancing accounts: SoCalGas has charged or expects to charge approximately **\$5178** to energy efficiency balancing accounts for the work done on statewide EECS during this time period.
- b. Costs that SoCalGas has charged, or expects to charge, to other ratepayer funding sources: **\$0**
- c. Costs that SoCalGas has charged, or expects to charge, to shareholder funding sources: **\$0**

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**QUESTION 11:**

Of the total from question 9(a), disaggregate these expenses into the following categories:

- d. Labor costs
- e. Employee expenses
- f. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.

**RESPONSE 11:**

Subject to the objection identified in the response to question 9, SoCalGas responds as follows:

- a. Labor costs: Approximately \$98
- b. Employee expenses: Approximately \$0
- c. Other. Please provide a list of activities or expenses included in the “Other” category, with the subtotal of charges for each item listed.
  - i. Approximately \$125 (Negawatt consulting)

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**QUESTION 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.

**RESPONSE 12:**

Subject to the objection identified in the response to question 10, SoCalGas responds as follows:

- a. Labor costs: Approximately \$516
- b. Employee expenses: Approximately \$0
- c. Other. Please provide a list of activities or expenses included in the "Other" category, with the subtotal of charges for each item listed.
  - ii. Approximately \$4,662 (Negawatt consulting)

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**QUESTION 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.

**RESPONSE 13:**

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment A.

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**QUESTION 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.

**RESPONSE 14:**

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment B.

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**QUESTION 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.

**RESPONSE 15:**

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment C.



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**QUESTION 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

**RESPONSE 16:**

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment D.