

Exhibit No: SCG-16
Docket No.: R.13-11-005
Witness: Cross-Exhibit



SOCALGAS RESPONSE TO PUBLIC ADVOCATES OFFICE
DATA REQUEST CALADVOCATES-HB-SCG-2018-03

April 1, 2019

**SOUTHERN CALIFORNIA GAS COMPANY
ENERGY EFFICIENCY CODES AND STANDARDS
(DATA REQUEST CAL ADVOCATES-HB-SCG-2018-03)**

**DATE RECEIVED: March 18, 2019
DATE SUBMITTED: April 1, 2019**

QUESTION 1:

Does SoCalGas record all energy efficiency costs in the Demand Side Management Balancing Account? If the answer is no, please list all accounts in which SoCalGas records energy efficiency expenditures.

RESPONSE 1:

Yes, all the energy efficiency costs are recorded in the Demand Side Management Balancing Account (DSMBA).

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QUESTION 2:

Do SoCalGas's energy efficiency balancing account entries identify the energy efficiency sub-program associated with the costs?

RESPONSE 2:

No, sub-programs associated with energy efficiency (EE) costs are not identified on the EE balancing account (DSMBA).

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QUESTION 3:

SoCalGas's July 16, 2018 responses to questions 9 and 10 of the Public Advocates Office Data Request ORA-HB-SCG-2018-09 (requesting the "Company-wide costs that SoCalGas has incurred related to EECS advocacy activities") stated:

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. (emphasis added)

Please list each and every type of cost that is included within the phrase "costs such as allocated overhead."

RESPONSE 3:

SoCalGas objects to the phrase "related to" as defined as vague and ambiguous and overbroad. Subject to the foregoing objections, SoCalGas responds as follows: Allocated overhead costs for the Energy Efficiency Portfolio, including Codes & Standards Advocacy, are general administrative overhead activities such as general administration, accounting support, IT services and support, and regulatory support. These overhead costs are for support of the entire portfolio, which are then allocated across all programs within the portfolio using a weighted average spread.

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QUESTION 4:

For each and every cost that is included within the phrase “costs such as allocated overhead,” please explain how SoCalGas recovers those costs.

RESPONSE 4:

Costs considered allocated overhead for any Energy Efficiency program, including Codes and Standard Advocacy Programs, are recovered through its Public Purpose Program (PPP) Filing based on a Commission approved budget. Once the Commission approves the PPP Filing for rate recovery, these costs are recovered through the PPP surcharge line item of customers’ bills and captured in the DSMBA.

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QUESTION 5:

Please quantify the “costs such as allocated overhead” for each of the energy efficiency costs identified in SoCalGas’s July 16, 2018 responses to the Public Advocates Office Data Request ORA-HB-SCG-2018-09 and its January 7, 2019 responses to Public Advocates Office CalAdvocates-HB-SCG-2018-13.

RESPONSE 5:

Allocated Overhead costs charged to Codes and Standards Advocacy programs for the time periods subject in SoCalGas’s July 16, 2018 responses to the Public Advocates Office Data Request ORA-HB-SCG-2018-09 and its January 7, 2019 responses to Public Advocates Office CalAdvocates-HB-SCG-2018-13 are as follows:

- June 1 – June 5, 2018: \$226.70
- June 6 – June 29, 2018: \$425.32