

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 1:

In 2017, Los Angeles World Airports updated its Alternative Fuel Vehicle Requirement Program.¹ At any time, has SoCalGas lobbied the Los Angeles Board of Airport Commissioners regarding its Alternative Fuel Vehicle Requirement Program?

RESPONSE 1:

SoCalGas objects to the term “lobbied” as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra’s Political Activities Policy. As noted in Sempra’s Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy’s Lobbying Policy states “there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply.” Consistent with Sempra Energy’s Lobbying Policy, Chapter 2.160 of the local Los Angeles County Lobbyist ordinance is applicable to this response. Section 2.1(B)(2) defines a lobbyist as a person who engages in “direct communication other than administrative testimony, with County Officials for the purpose of influencing official County action.” Section 2.4 of the ordinance states: “time spent representing clients in such formal quasi-judicial administrative proceedings should not be counted in evaluating the level of lobbying activities.” Section 2.5

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

states: "Direct communication does not include any request for provision of purely technical data or analysis to a County agency." See Los Angeles County Lobbyist Ordinance, Chapter 2.160 of the County Code.

Subject to and without waiving its objection, SoCalGas responds as follows:

Yes.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 2:

If the answer to question 1 is yes, please identify:

- a. Each date that such lobbying occurred;
- b. The specific issues that the lobbying addressed;
- c. All of the individuals who authorized the lobbying;
- d. The name and title of each SoCalGas employee involved in the lobbying;
- e. Any agent, consultant or firm engaged to support or participate in any manner with the lobbying; and
- f. The total costs that SoCalGas has incurred in association with this lobbying

RESPONSE 2:

SoCalGas objects to the term “lobbied” as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra's Political Activities Policy. As noted in Sempra's Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy's Lobbying Policy states "there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply." Consistent with Sempra Energy's Lobbying Policy, Chapter 2.160 of the local Los Angeles County Lobbyist ordinance is applicable to this response. Section 2.1(B)(2) defines a lobbyist as a person who engages in "direct communication other than administrative testimony, with County Officials for the purpose of influencing official County action." Section 2.4 of the ordinance states: "time spent representing clients in such formal quasi-judicial administrative proceedings should not be counted in evaluating the level of lobbying activities." Section 2.5 states: "Direct communication does not include any request for provision of purely technical data or analysis to a County agency." See Los Angeles County Lobbyist Ordinance, Chapter 2.160 of the County Code.

SoCalGas performed its due diligence reviewing records and interviewing current employees. To the best of SoCalGas' knowledge, the lobbying activity involved one 30-minute telephone call from Regional Public Affairs Employee, [REDACTED] who is a registered lobbyist. We are unaware of any other lobbying activities at this time.

Subject to and without waiving its objection, SoCalGas responds as follows:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. October 4, 2017, [REDACTED] had a 30-minute telephone call with a LAWA staff member.
- b. Clarified incorrect information in the LAX Alternative Fuel Vehicle Requirement staff report, provided information about the benefits of ultra-low NOx CNG vehicles, and asked that said vehicles be included in the proposed Requirement.
- c. George Minter
- d. [REDACTED], Government Affairs Manager
- e. [REDACTED] flagged the issue to SoCalGas Staff. They did not conduct any lobbying activities.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

- f. SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5- year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs.

On January 9, 2020, SoCalGas conferred with the Public Advocates Office and its counsel about clarifications to the scope of DR-10 regarding “total costs” incurred associated with lobbying. In accordance with the Public Advocates Office email dated January 9, 2020, regarding providing estimated costs, this data request response is based on the following guidance by the Public Advocates:

“For all of the updated answers to DR 10, SoCalGas will provide not only an estimate of the costs, but the basis for the estimates so that the Public Advocates Office has an understanding of how SoCalGas reached the estimates.” “If employees do not track their costs, as asserted in response to the DR, SoCalGas should at least be able to provide a reasonable estimate of the costs.”

Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas estimates approximately \$ [REDACTED] (30 minute preparation and 30 minutes speaking to staff member).

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 3:

With regard to the lobbying described in response to question 2, please provide:

- a. Any contracts or other business agreements related to the lobbying;
- b. Any invoices related to the lobbying, regardless of the status of such invoice; and
- c. Any materials used to prepare for or presented during the lobbying.

RESPONSE 3:

SoCalGas objects to the term “lobbied” as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra’s Political Activities Policy. As noted in Sempra’s Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy’s Lobbying Policy states “there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply.” Consistent with Sempra Energy’s Lobbying Policy, Chapter 2.160 of the local Los Angeles

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

County Lobbyist ordinance is applicable to this response. Section 2.1(B)(2) defines a lobbyist as a person who engages in “direct communication other than administrative testimony, with County Officials for the purpose of influencing official County action.” Section 2.4 of the ordinance states: “time spent representing clients in such formal quasi-judicial administrative proceedings should not be counted in evaluating the level of lobbying activities.” Section 2.5 states: “Direct communication does not include any request for provision of purely technical data or analysis to a County agency.” See Los Angeles County Lobbyist Ordinance, Chapter 2.160 of the County Code.

- a. None
- b. None
- c. None

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 4:

Please disaggregate the costs identified in response to question 2 into the following categories:

- a. Labor:
- b. Travel, lodging, meals, and incidental travel expenses:
- c. Consultant costs:
- d. Other:

RESPONSE 4:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5- year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs.

On January 9, 2020, SoCalGas conferred with the Public Advocates Office and its counsel about clarifications to the scope of DR-10 regarding “total costs” incurred associated with lobbying. In accordance with the Public Advocates Office email dated January 9, 2020, regarding providing estimated costs, this data request response is based on the following guidance by the Public Advocates:

“For all of the updated answers to DR 10, SoCalGas will provide not only an estimate of the costs, but the basis for the estimates so that the Public Advocates Office has an understanding of how SoCalGas reached the estimates.” “If employees do not track their costs, as asserted in response to the DR, SoCalGas should at least be able to provide a reasonable estimate of the costs.”

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas estimates total labor costs: \$ [REDACTED]

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

- b. Travel, lodging, meals, and incidental travel expenses: \$0
- c. Consultant costs: \$0
- d. Other: \$0

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 5:

Please identify each account to which any portion of the costs identified in response to question 2 were charged.

- a. State the account name and cost center number.
- b. State whether the account is ratepayer funded.
- c. State how much was charged to the account.

RESPONSE 5:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5- year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs. As CalAdvocates and other interveners have done in past rate cases, costs that are included in GRC forecasts can be challenged during the rate case process.

Subject to and without waiving its objection, SoCalGas responds as follows:

- a. State the account name and cost center number.

Cost Center: 2200-0811
IO Number: FG9205702200

- b. State whether the account is ratepayer funded. Yes. As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

c. State how much was charged to the account. \$

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 6:

On October 18, 2017, a press conference was held in South Gate regarding the Advanced Clean Trucks Now Plan.3

- a. Please describe SoCalGas's role in this event;
- b. Please describe the role of SoCalGas's consultants in this event; and
- c. Was this press conference intending to influence the type of vehicles the Port of Long Beach should procure? If so, please explain.

RESPONSE 6:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. SoCalGas' role was to bring awareness to local elected officials on compressed natural gas heavy duty technologies. SoCalGas utilized consultant, [REDACTED] to garner the support of local elected officials. SoCalGas assisted in securing speakers for the event. It also appears that the SoCalGas' media team was made aware of the event at the time, and provided input into various draft media documents.
- b. [REDACTED] was on retainer with SoCalGas during this time, and consulted on a broad range of issues. [REDACTED] was made aware of the media strategy, and coordinated one earned media interview. [REDACTED] brought awareness to local elected officials, asked local officials to participate in a press conference; and confirmed participant attendance. SoCalGas is including [REDACTED] in the response due to emails produced in DR-06 relating to the October 18, 2017, press conference. The emails demonstrate that [REDACTED] coordinated logistics for the event. After conducting a due diligence review, including interviews with current employees and reviewing the emails produced in DR-06, SoCalGas can confirm that the company did not contract with [REDACTED] directly or pay [REDACTED] as a consultant for this event.
- c. SoCalGas objects to the term "influence" as vague and ambiguous and to the extent the term is used to define or describe lobbying activity.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

Subject to and without waiving its objection, SoCalGas responds as follows:
The October 18, 2017 press conference was a part of SoCalGas' efforts to bring awareness of the current impacts that heavy duty trucks have along the corridor and to urge the Port of Long Beach to incorporate all potential heavy-duty truck technologies to address clean air issues.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 7:

In SoCalGas's response to Question 1 in Data Request CalAdvocates-SC-SCG-2019-10, SoCalGas stated it lobbied the Port of Long Beach officials regarding the proposed zero emissions transition. Since 2017, has SoCalGas engaged in any other lobbying of the Port of Long Beach officials regarding the proposed emissions transition outside of the disclosed meeting?

RESPONSE 7:

SoCalGas objects to the term "lobbied" as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that "SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers." Cal Advocates' request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase "lobbied" refers to activities generally excluded from "lobbying" definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities "directly related to public appearances before regulatory or other governmental bodies in connection with a utility's existing or proposed operations." See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra's Political Activities Policy. As noted in Sempra's Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy's Lobbying Policy states "there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply." Consistent with Sempra Energy's Lobbying Policy, Chapter 2.08 of the City of Long Beach lobbying ordinance is applicable to this response. Section 2.08.020 exempts "persons whose communications regarding any legislative or administrative action are limited to appearing or

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

submitting testimony at any public meeting held by the City or any of its agencies, offices, or departments.” (City of Long Beach Municipal Code, Chapter 2.08, March 11, 2010).

Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas performed its due diligence reviewing records and interviewing current employees. To the best of SoCalGas’ knowledge, there has been no lobbying activity of the Port of Long Beach officials regarding the proposed emissions transition since 2017. We are unaware of any other lobbying activities at this time.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 8:

Since 2017, has SoCalGas lobbied mayors or councilmembers in Long Beach, Los Angeles, or other surrounding cities in an attempt to influence the type of vehicles the San Pedro Bay Ports procure regarding the proposed zero emissions transition?

RESPONSE 8:

SoCalGas objects to the term “lobbied” as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra’s Political Activities Policy. As noted in Sempra’s Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy’s Lobbying Policy states “there are...local lobbying registration and

Consistent with Sempra Energy’s Lobbying Policy, Chapter 2.08 of the City of Long Beach lobbying ordinance is applicable to this response. Section 2.08.020 exempts “persons whose communications regarding any legislative or administrative action are limited to appearing or submitting testimony at any public meeting held by the City or any of its agencies, offices, or departments.” (City of Long Beach Municipal Code, Chapter 2.08, March 11, 2010).

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

Consistent with Sempra Energy's Lobbying Policy, Chapter 2.160 of the local Los Angeles County Lobbyist ordinance is applicable to this response. Section 2.1(B)(2) defines a lobbyist as a person who engages in "direct communication other than administrative testimony, with County Officials for the purpose of influencing official County action." Section 2.4 of the ordinance states: "time spent representing clients in such formal quasi-judicial administrative proceedings should not be counted in evaluating the level of lobbying activities." Section 2.5 states: "Direct communication does not include any request for provision of purely technical data or analysis to a County agency." See Los Angeles County Lobbyist Ordinance, Chapter 2.160 of the County Code.

SoCalGas performed its due diligence reviewing records and interviewing current employees. To the best of SoCalGas' knowledge, there has been no lobbying activity in an attempt to influence the type of vehicles the San Pedro Bay Ports procure regarding the proposed zero emissions transition since 2017. We are unaware of any other lobbying activities at this time.

QUESTION 9:

If the answer to either questions 7 or 8 is yes, please identify:

- a. Each date that such lobbying occurred;
- b. The specific issues that the lobbying addressed;
- c. All of the individuals who authorized the lobbying;
- d. The name and title of each SoCalGas employee involved in the lobbying;
- e. Any agent, consultant or firm engaged by SoCalGas to support or participate in any manner with the lobbying; and
- f. The total costs that SoCalGas has incurred in association with this lobbying.

RESPONSE 9:

Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 10:

With regard to the lobbying described in response to question 9, please provide:

- a. Any contracts or other business agreements related to the lobbying;
- b. Any invoices related to the lobbying, regardless of the status of such invoice; and
- c. Any materials used to prepare for or presented during the lobbying.

RESPONSE 10:

Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 11:

Please disaggregate the costs identified in response to question 9 into the following categories:

- a. Labor
- b. Travel, lodging, meals, and incidental travel expenses
- c. Consultant costs
- d. Other

RESPONSE 11:

Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 12:

Please identify each account to which any portion of the costs identified in response to question 9 were charged.

- a. State the account name and cost center number.
- b. State whether the account is ratepayer funded.
- c. State how much was charged to the account.

RESPONSE 12:

Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 13:

In SoCalGas's response to Question 1 in Data Request CalAdvocates-SC-SCG-2019-11, SoCalGas stated it lobbied the Los Angeles County Metropolitan Transportation Authority regarding its metro bus fleet. Please describe in narrative form the types of lobbying SoCalGas undertook in this effort.

RESPONSE 13:

SoCalGas objects to the term "lobbied" as vague and ambiguous.

For CPUC accounting purposes, the Federal Energy Regulatory Commission (FERC) definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below-the-line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that "SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers." Cal Advocates' request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase "lobbied" refers to activities generally excluded from "lobbying" definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities "directly related to public appearances before regulatory or other governmental bodies in connection with a utility's existing or proposed operations." See Title 18 Code of Federal Regulations (CFR) Part 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra's Political Activities Policy. As noted in Sempra's Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy's Lobbying Policy states "there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply." Consistent with Sempra Energy's Lobbying Policy, the Los Angeles Metropolitan Authority excludes "administrative testimony" and appearances at "any MTA proceeding that is conducted as an open public hearing" and "providing technical advice or information pursuant to the request of an MTA official" as lobbying activity. See Los Angeles County Metropolitan

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

Transportation Authority, Information Manual for Lobbyist Registration and Reporting (January 2005).

Subject to and without waiving its objection, SoCalGas responds as follows:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

[REDACTED] spoke to Metropolitan Transportation Authority staff and board members about the benefits of the then new ultra-low NOX CNG engine and renewable natural gas.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 14:

For any lobbying efforts SoCalGas undertook in an attempt to influence the Los Angeles County Metropolitan Transportation Authority regarding the metro bus fleet, please identify:

- a. Each date that such lobbying occurred;
- b. The specific issues that the lobbying addressed;
- c. All of the individuals who authorized the lobbying;
- d. The name and title of each SoCalGas employee involved in the lobbying;
- e. Any agent, consultant or firm engaged by SoCalGas to support or participate in any manner with the lobbying; and
- f. The total costs that SoCalGas has incurred in association with this lobbying.

RESPONSE 14:

SoCalGas objects to the term “lobbying” as vague and ambiguous.

For CPUC accounting purposes, the FERC definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below the line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See 18 CFR 367.4264(b).

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra's Political Activities Policy. As noted in Sempra's Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy's Lobbying Policy states "there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply." Consistent with Sempra Energy's Lobbying Policy, the Los Angeles Metropolitan Authority excludes "administrative testimony" and appearances at "any MTA proceeding that is conducted as an open public hearing" and "providing technical advice or information pursuant to the request of an MTA official" as lobbying activity. See Los Angeles County Metropolitan Transportation Authority, Information Manual for Lobbyist Registration and Reporting (January 2005).

Subject to and without waiving its objection, SoCalGas responds as follows:

See Response to Question 3 in Data Request CalAdvocates-SC-SCG-2019-11. In addition to these responses in DR-11, SoCalGas adds the following:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. As a member of a broader coalition, [REDACTED] coordinated SoCalGas' attendance at MTA meetings. SoCalGas' response is derived from the emails and documents produced in DR-06. SoCalGas cannot confirm if [REDACTED] attended all of the meetings listed below, nor can SoCalGas confirm if [REDACTED] was representing SoCalGas or a broader coalition at these meetings. The emails reflect that other SoCalGas employees were copied on emails for awareness only. [REDACTED], who is a registered lobbyist with the MTA, attended two of these meetings.

MTA Contacts Meetings:

- March 15, 2017
- March 16, 2017
- March 17, 2017
- March 20, 2017
- March 29, 2017
- March 30, 2017
- April 13, 2017
- April 23, 2017

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

-
- May 2, 2017
 - May 23, 2017
 - June 20, 2017 (potentially two meetings on this date)

In addition to the above, from the review of travel expense reports [REDACTED] shows attending meetings related to the LA MTA, listed below. However, SoCalGas cannot confirm if these meetings included lobbying activities. SoCalGas will include the labor and travel costs of these meetings in the subsequent questions as overly conservative.

- March 22, 2017
- March 23, 2017
- April 27, 2017
- May 5, 2017
- May 25, 2017
- June 2, 2017
- June 9, 2017
- June 15, 2017
- June 22, 2017

b. Metropolitan Transportation Authority bus fleet

c. George Minter

d. See Response to Question 3d in Data Request CalAdvocates-SC-SCG-2019-11. In addition to this response, SoCalGas adds the following employee pertaining to the meetings listed above in 14a:

[REDACTED], Public Policy Manager

[REDACTED], Senior Governmental Affairs Manager

e. See Response to Question 3e in Data Request CalAdvocates-SC-SCG-2019-11. In addition to this response, SoCalGas adds the following consultant pertaining to the meetings listed above in 14a: [REDACTED] assisted in scheduling four of these meetings.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

-
- f. On January 9, 2020, SoCalGas conferred with the Public Advocates Office and its counsel about clarifications to the scope of DR-10 regarding “total costs” incurred associated with lobbying. In accordance with the Public Advocates Office’s email dated January 9, 2020, regarding providing estimated costs, this data request response is based on the following guidance by the Public Advocates Office:

“For all of the updated answers to DR 10, SoCalGas will provide not only an estimate of the costs, but the basis for the estimates so that the Public Advocates Office has an understanding of how SoCalGas reached the estimates.” “If employees do not track their costs, as asserted in response to the DR, SoCalGas should at least be able to provide a reasonable estimate of the costs.”

SoCalGas objects to “total cost” as overbroad and unduly burdensome. Additionally, SoCalGas objects to this data request to the extent the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC, where the 5-year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs. SoCalGas’ response is derived from the emails and documents produced in DR-06. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Subject to and without waiving its objection, SoCalGas responds as follows:

See Response to Question 3f in Data Request CalAdvocates-SC-SCG-2019-11. Also, see response to Question 8 in Data Request CalAdvocates-SC-SCG-2019-11, which asks for “costs associated with influencing public opinion on the type of buses the LA County MTA should procure to replace its aging feet.” As part of this response SoCalGas explained there are e-mail correspondence for three employees regarding the LA County MTA. This does not include meetings. SoCalGas cannot confirm which, if any of these e-mails show “evidence of lobbying” activities. In addition to this response, SoCalGas adds the following costs pertaining to the meetings listed above in 14a:

If [REDACTED] attended all 21 meetings listed in response 14a, SoCalGas estimates each meeting being one hour long and therefore estimates total labor time to be his hourly rate (\$ [REDACTED] * 21) \$ [REDACTED].

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

[REDACTED] attended two of these meetings. SoCalGas estimates Frank Lopez's time for meeting attendance and prep time to be 4 hours. Therefore, estimates total labor time to be his hourly rate [REDACTED] * 4) [REDACTED].

[REDACTED] receive a [REDACTED] monthly retainer fee and provide an average of 15 hours of work per month for governmental affairs. For the prep of these meeting, [REDACTED] spent approximately 8 hours of time. Based on this, SoCalGas estimates [REDACTED] incurred [REDACTED] in costs. This amount is calculated by dividing the [REDACTED] per month retainer fee by an average of 15 hours work per month for a [REDACTED] per hour fee then multiplying by 8 to obtain the 8 hours spent arranging the meeting.

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 15:

With regard to the lobbying described in response to question 14, please provide:

- a. Any contracts or other business agreements related to the lobbying;
- b. Any invoices related to the lobbying, regardless of the status of such invoice; and
- c. Any materials used to prepare for or presented during the lobbying.

RESPONSE 15:

SoCalGas objects to the term “lobbying” as vague and ambiguous.

For CPUC accounting purposes, the FERC definition of lobbying applies. See Section 793 of the California Public Utilities Code. Also, the CPUC has referenced the below the line FERC Account 426.4 in numerous ratemaking decisions, such as in a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA [Cal Advocates predecessor] agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Cal Advocates’ request for lobbying activity and costs relate to accounting information and the treatment of costs attributable to ratepayers. Accordingly, the FERC definition is the appropriate definition for the purposes of responding to the data request in question. To the extent that the phrase “lobbied” refers to activities generally excluded from “lobbying” definitions, such as appearing at public meetings, giving administrative testimony at a public hearing, or providing technical advice or information to an official, these activities were excluded from this response. For instance, the FERC definition of lobbying excludes activities “directly related to public appearances before regulatory or other governmental bodies in connection with a utility’s existing or proposed operations.” See 18 CFR 367.4264(b).

For reporting purposes, SoCalGas uses the definition of lobbying that is consistent with Sempra’s Political Activities Policy. As noted in Sempra’s Political Activities Policy, activities can also be expressly excluded as lobbying by particular laws, regulations, ordinances, or guidance provided by the governmental body at issue, such as differing local jurisdictional definitions. Sempra Energy’s Lobbying Policy states “there are...local lobbying registration and disclosure laws with which Sempra Energy and the Sempra Energy Companies comply.” Consistent with Sempra Energy’s Lobbying Policy, the Los Angeles Metropolitan Authority

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

excludes “administrative testimony” and appearances at “any MTA proceeding that is conducted as an open public hearing” and “providing technical advice or information pursuant to the request of an MTA official” as lobbying activity. See Los Angeles County Metropolitan Transportation Authority, Information Manual for Lobbyist Registration and Reporting (January 2005).

SoCalGas contracted with [REDACTED]. An additional firm, [REDACTED] also supported these efforts. However, SoCalGas confirmed that [REDACTED] and SoCalGas did not enter into a contract regarding this issue. SoCalGas is including [REDACTED] in the response due to invoices found relating to the Metropolitan Transportation Authority. We understand that these invoices were not paid by SoCalGas, and it is unclear whether or not SoCalGas is ultimately responsible for payment. While SoCalGas has a general contract and retainer agreement with [REDACTED] to assist with various consulting work, based on SoCalGas’ records, we are unaware of any of the work being associated with lobbying the MTA. In the interest of transparency, SoCalGas provides Cal Advocates with the total amount of [REDACTED] paid to [REDACTED] in 2018. This amount includes a broad range of matters for which Marathon provided consulting services and guidance, which may be unrelated to “lobbying” concerning the type of buses the Los Angeles County Metropolitan Transportation Authority should procure.

SoCalGas’ Amended Response dated April 24, 2020:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

The cost listed above of \$ [REDACTED] as payment to Marathon was incorrectly stated as being paid in 2018. That amount was paid in 2017 through invoices that are not part of a contract. There are two additional invoices under contract # 5660049620. One paid in 2017 totaling \$ [REDACTED] and one in 2018 totaling \$ [REDACTED]. These invoices do not mention the Los Angeles County Metropolitan Transportation Authority (“MTA”); however, the contract applicable to these invoices lists work on the MTA as one of a broader list of duties. Refer to SoCalGas’ amended response dated April 24, 2020 in CalAdvocates-SC-SCG-2019-11, question 9c for further details.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. See the [REDACTED] (now [REDACTED]) contract and amendment that was provided as part of Response 18a of this data request submitted on March 3. In addition to these contracts, see attached contract documents with [REDACTED] titled:

Confid_5660049620
Confid_5660049620 T C

- b. See the [REDACTED] and [REDACTED] invoices attached titled:

Invoice 1219000_refc20170701
Invoice 1226428_ref 20170801
Invoice 1248099_ref 170901
[REDACTED]_5660049620_20171115
[REDACTED]_5660049620_20171215

Amended Response dated April 24, 2020

See two Marathon invoices attached:
Marathon-Non-P.O. #5446_Confidential
Marathon-Non-P.O. #5411_Confidential

These two invoices are not part of a contract.

- c. SoCalGas is not aware of materials responsive to this request at this time.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 16:

Please disaggregate the costs identified in response to question 14 into the following categories:

- a. Labor
- b. Travel, lodging, meals, and incidental travel expenses
- c. Consultant costs
- d. Other

RESPONSE 16:

On January 9, 2020, SoCalGas conferred with the Public Advocates Office and its counsel about clarifications to the scope of DR-10 regarding “total costs” incurred associated with lobbying. In accordance with the Public Advocates Office email dated January 9, 2020, regarding providing estimated costs, this data request response is based on the following guidance by the Public Advocates:

“For all of the updated answers to DR 10, SoCalGas will provide not only an estimate of the costs, but the basis for the estimates so that the Public Advocates Office has an understanding of how SoCalGas reached the estimates.” “If employees do not track their costs, as asserted in response to the DR, SoCalGas should at least be able to provide a reasonable estimate of the costs.”

SoCalGas objects to “costs” as overbroad and unduly burdensome. Additionally, SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5-year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs. SoCalGas’ response is derived from the emails and documents produced in DR-06. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Subject to and without waiving its objection, SoCalGas responds as follows:

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

a. See Response to Question 4 in Data Request CalAdvocates-SC-SCG-2019-11 and see response to 14f above in this data request.

b. See Response to Question 4b in Data Request CalAdvocates-SC-SCG-2019-11. In addition to this response, [REDACTED] claimed [REDACTED] in travel expenses relate to response 14a above.

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

c. See Response to Question 4c in Data Request CalAdvocates-SC-SCG-2019-11 and see response to 14f above in this data request. In addition to this response, SoCalGas adds the following:

The [REDACTED] invoices under contract agreement # 5660049620 total \$ [REDACTED]. Although one of the invoices has description of tasks, it is difficult to determine what tasks may have been attributed to the question at hand.

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

Amended Response dated April 24, 2020

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

There are two Marathon invoices not under a contract totaling \$ [REDACTED]. Although the invoices have description of tasks, it is difficult to determine what tasks may have been attributed to the question at hand.

d. SoCalGas is not aware of other costs responsive to this request at this time.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 17:

Please identify each account to which any portion of the costs identified in response to question 14 were charged.

- a. State the account name and cost center number.
- b. State whether the account is ratepayer funded.
- c. State how much was charged to the account.

RESPONSE 17:

SoCalGas objects to “costs” as overbroad and unduly burdensome. Additionally, SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5-year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs. SoCalGas’ response is derived from the emails and documents produced in DR-06. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Subject to and without waiving its objection, SoCalGas responds as follows:

Response to Question 5 in Data Request CalAdvocates-SC-SCG-2019-11. In addition to this response, SoCalGas adds the following:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

As a member of a broader coalition, Ken Chawkins coordinated SoCalGas’ attendance at MTA meetings. SoCalGas’ response is derived from the emails and documents produced in DR-06. The emails reflect that other SoCalGas employees were copied on emails for awareness only.

- a.
Cost Center: 2200-2504

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

IO Number: 9200002200

[REDACTED], (Regional Public Affairs)

Cost Center: 2200-0811

IO Number: 9205702200

[REDACTED]
Shared cost center: (External Affairs)

IO Number: 9215702200

Cost Center: 2200-2285

IO Number: 9210002200

[REDACTED]
IO Number: FG9210002200

Cost Center: 2200-2441

[REDACTED], (Regional Public Affairs)

Cost Center: 2200-0811

IO Number: 9205702200

b. All accounts listed above are ratepayer funded. As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

c. Please see salary hourly rate and breakdown in response to Q14f.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 18:

Provide all contracts since 2017 between SoCalGas and [REDACTED], [REDACTED]. (excluding Agreement: 5660052135), and [REDACTED]

- a. Include any amendments and requisition requests.
- b. For any contract that refers in any manner to lobbying efforts, including those regarding the Port of Long Beach's proposed zero emissions transition and the Los Angeles County Metropolitan Transportation Authority's metro bus fleet procurement, please identify all lobbying events and activities that have occurred or that are anticipated, including the date that they occurred or will occur in the future.

RESPONSE 18:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. See attachments submitted on March 3:

[REDACTED] Scope of Work
[REDACTED] Amendment 1
SoCalGas [REDACTED] Contract.

In addition to the [REDACTED] contracts submitted on March 3 as part of this response, see also the [REDACTED] contracts in response to 15a. Additionally, a requisition form for the [REDACTED] and [REDACTED] contract is attached.

Regarding the [REDACTED] contracts, the lobbying events and activities that have occurred have been identified in SoCalGas' data request responses to Data Request CalAdvocates-SC-SCG-2019-10, Data Request CalAdvocates-SC-SCG-2019-11 and above in response 14e, related to the Port of Long Beach's proposed zero emissions transition and the Los Angeles County Metropolitan Transportation Authority's metro bus fleet procurement. In addition to these activities, [REDACTED] also facilitated but did not lobby, an October 4, 2018 meeting with the Office of an LA Councilmember to discuss the City of LA's Oil and Gas Facilities Inspection Ordinance.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

From SoCalGas' review of the [REDACTED] contract with agreement number 5660049620 and associated invoices, it appears [REDACTED] was paid to do activities that assisted SoCalGas to prepare for lobbying type activities and may have attended any lobbying type meetings or participated in lobbying type phone calls.

At this time, SoCalGas cannot anticipate future lobbying activities and events that may occur under the [REDACTED] contract. Issues SoCalGas sets as priorities change rapidly, depending on local, State and Federal actions. Further, with the current coronavirus impacts to businesses, it is unknown how government meetings and actions will be impacted. SoCalGas currently does not have an active contract with [REDACTED]

Amended Response dated April 24, 2020

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

SoCalGas is including a contract with Imprenta Communications that was part of documents produced in DR-6. See Imprenta Communications Contract dated February 7, 2018 (Cal PA DR6 – 0015920). This February 7, 2018 contract stated that Imprenta would, among other things, “maintain the existing RNG BusesNow.org bilingual landing pages,” “post organic content on RNG Coalition’s FB page,” and “develop asset creation including content generation, publishing, platform management and reporting.”

SoCalGas has located an Amendment 1 to the Imprenta Communications contract dated January 15, 2019 (Cal PA DR6 – 0001153). This amendment stated that the “expiration date of the Agreement is hereby extended until June 28, 2019.” SoCalGas has also found emails that refer to an “Amendment 2” however, at present, SoCal Gas does not have evidence that this proposed amendment was reduced to an enforceable contract.

See attached:

Signed Contract Imprenta Communications Group 3-8-2018_Confidential
Signed Contract Imprenta Communications Group Amendment1_Confidential
Requisition Summary – Imprenta Communications Group Confidential

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 19:

Please identify each account to which any portion of the costs identified in response to question 18 were charged.

- a. State the account name and cost center number.
- b. State whether the account is ratepayer funded.
- c. State how much was charged to the account.

RESPONSE 19:

SoCalGas objects to “costs” as overbroad and unduly burdensome. Additionally, SoCalGas objects to this data request to the extent, the request pre-litigates the next General Rate Case (GRC). The costs that Cal Advocates requests from 2017 to present are not litigated until the next GRC where the 5-year historical period of actual costs is examined. Thus, while an estimate of costs does not currently exist, as the scope of the request is vague and premature and SoCalGas is not obligated to create records, SoCalGas is nonetheless providing information gathered that might be used by Cal Advocates in estimating costs. SoCalGas’ response is derived from the emails and documents produced in DR-06. SoCalGas reserves the right to supplement, clarify or amend the following response due to its vague and premature nature in pre-litigating GRC activities. Subject to and without waiving its objection, SoCalGas responds as follows:

The response includes highlighted Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. SoCalGas’ data request responses to Data Request CalAdvocates-SC-SCG-2019-10 and Data Request CalAdvocates-SC-SCG-2019-11, related to the Port of Long Beach’s proposed zero emissions transition and the Los Angeles County Metropolitan Transportation Authority’s metro bus fleet procurement. In addition to these responses, see response to Question 17a in this data request.
- b. Ratepayer funded. As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

- c. In addition to what has already been described above in response 14f and 16c, the additional task described in 18b - [REDACTED] also facilitated but did not lobby, an October 4, 2018 meeting with the Office of LA Councilmember to discuss the City of LA's Oil and Gas Facilities Inspection Ordinance.

An estimated maximum amount of time SoCalGas believes [REDACTED] performed on this task is 2 hours. [REDACTED] receive a [REDACTED] monthly retainer fee and provide an average of 15 hours of work per month for governmental affairs. Based on this, SoCalGas estimates [REDACTED] incurred [REDACTED] in costs. This amount is calculated by dividing the [REDACTED] per month retainer fee by an average of 15 hours work per month for a [REDACTED] per hour fee then multiplying by 2 to obtain the 2 hours spent arranging the meeting.

As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 20:

In SoCalGas's January 17, 2020 cover letter to Elizabeth Echols, Director of the Public Advocates Office, SoCalGas wrote it discovered "communications of an employee that are contrary to SoCalGas's value." Please explain the nature of these violations in detail and SoCal Gas's response to those violations, including, without limitation, steps taken to address any systemic issues revealed by these violations.

RESPONSE 20:

SoCalGas objects to the term "violations" in this data request and to the extent it requests private and confidential personnel matters protected from unauthorized release by the California Constitution. The custodian of such private information may not waive the privacy rights of persons who are constitutionally guaranteed their protection. Even where the balance, because of a 'compelling state purpose,' weighs in favor of disclosure of private information, the scope of such disclosure will be narrowly circumscribed; such an invasion of the right of privacy 'must be drawn with narrow specificity.' See *Board of Trustees v. Superior Court*, 119 Cal. App. 3d 516, 174 Cal. Rptr. 160 (1981) citing *Britt v. Superior Court*, 20 Cal.3d 844, 856.

Subject to and without waiving its objection, SoCalGas responds as follows:

There were communications from the employee that were contrary to SoCalGas' policies regarding workplace anti-harassment and discrimination, including but not limited to: "That's what she said" jokes and whether "they let Jews into the Jonathan club". SoCalGas has long had Harassment Free Workplace and Code of Conduct policies in place prohibiting discrimination and harassment, and company employees are trained on these policies. SoCalGas does not believe any systemic issues have been revealed. This is evidenced by the fact that SoCalGas recognized immediately that these emails were problematic and contrary to SoCalGas' values.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 21:

Has SoCalGas contracted with or begun the process to establish a contract with George Minter or an organization that represents George Minter? If yes, please provide the following:

- a. The contract(s) and any amendment(s)
- b. The requisition request(s)
- c. Any invoices received to date

RESPONSE 21:

No.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 22:

In response to Data Request CalAdvocates-SK-SCG-2020-01 Question 4, SoCalGas stated, “an incorrect settlement rule was set up for this IO to FERC 920.0 A&G Salaries, consequently, the costs initially settled to the incorrect FERC account. On September 21, 2019, the SoCalGas Accounting Controller and Accounting Director met with the Strategy, Engagement & Chief Environmental Officer, and confirmed that the Balanced Energy activities should be classified as FERC 426.4 - Expenditures-Civic & Related Activities/Lobbying Costs.”

Please:

- a. Describe how SoCalGas came to be aware that an incorrect settlement rule was set up for IO 300796601.
- b. Provide all accounting instructions/forms that lead to the incorrect settlement of the costs.
- c. Provide all accounting instructions/forms that lead to the change described above being effectuated.
- d. Provide documentation showing that the change described above has been effectuated.

RESPONSE 22:

The intent of opening the Work Order Authorization (“WOA”) was to track the cost as shareholder funded and excludable from GRC. This IO was provided to the GRC team for exclusion on June 19, 2019. Exclusion means that the costs will not be included as part of the future GRC request. As noted in the TY2019 GRC workpapers, not all recorded costs are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders. Upon further review of the FERC account used for this IO, it was determined that FERC 426.4 would better reflect the activities being charged. Expenses recorded to FERC account 426.4 are automatically excluded from GRC financial analysis by the GRC team.

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

- a. A standard WOA form was completed on 3/28/19. See attached request e-mail titled – WOA-New IO Needed for Balanced Energy. Note that the attachment in this e-mail was previously provided on September 4, 2019 per a request from Stephen Castello on August 29, 2019 regarding CalAdvocates-SC-SCG-2019-05. The original Balanced Energy WOA was part of SoCalGas’ response to question 1 in CALADVOCATES-SC-SCG-2019-04.

- b. On 9/21/2019, Strategy & Engagement described the activities being charged to this IO and Accounting confirmed that FERC 426.4 should be the proper settlement rule as described in the Code of Federal Regulations (“CFR”). Subsequent to that meeting, by Oct 2019, this IO was changed to FERC 426.4. See the attached document – Updated Balanced Energy WOA, which reflects this change.

- c. In October 2019, this IO was updated to reflect FERC 426 within SAP.

Display Settlement Rule: Overview												
Actual settlement Other Version												
Order		300796601 BALANCED ENERGY										
Plan settlement		Version 2 Plan version 2 - FERC Dist										
Plan - Settlement Rules												
Cat	Settlement Receiver	Receiver Short Text	%	Equivalence no.	Se...	No.	Fro...	From...	To ...	To Fi...	First Used	Last Used
CTR	20000G	A&G SALARIES	100.00	0	PER	1	3	2019	9	2019	009/2019	009/2019
CTR	F426400G	EXP-CIVIC & RELATED	100.00	0	PER	2	10	2019	16	9999	001/2020	001/2020

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 23:

Please provide any two distinct Work Order Authorizations signed by Sharon Tomkins between June 2, 2018 and March 20, 2019.

RESPONSE 23:

See attached document – GHG WOA Nov 13 2018

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-AW-SCG-2020-01)

12th in a Series

Date Received: February 14, 2020

Date Submitted: March 3, 2020

Date Amended Response Submitted: March 20, 2020

2nd Amended Response Submitted: April 24, 2020

QUESTION 24:

Please explain how and to what level of specify SoCalGas' salaried employees track their time and provide an actual example of a monthly timesheet of a salaried Regional Public Affairs employee with all confidential personnel information redacted.

RESPONSE 24:

Regional Public Affairs employees do not track their time by project or proceedings. Employee time is recorded through electronic bi-weekly timesheets, an example of which is provided in the screenshot below. Regional Public Affairs employees are salaried employees, and their labor costs and expenses are recorded to ratepayer funded cost centers. As noted in the TY2019 GRC workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders.

Please see example below:

The screenshot displays a 'Time Entry' interface for the week of February 21, 2020. The timesheet table shows the following data:

Date	Pay Code	Hours	Order	Cost Center	Reason	Veh
Sat 02/15	Hours Worked					
Sun 02/16	Hours Worked					
Mon 02/17	Holiday Pay	8.00				
Tue 02/18	Hours Worked	8.00				
Wed 02/19	Hours Worked	8.00				
Thu 02/20	Hours Worked	8.00				
Fri 02/21	Hours Worked	8.00				
		40.00				

Below the timesheet, the 'Exceptions' section is expanded for Friday 02/21, showing the following 'HR Demographic Data':

- Company: 15 - Southern California Gas Co.
- Dept: 50630 - Regl Public Affairs - Anaheim
- Reg/Temp: R
- Full/Part Time: F
- Empl Class: N - Regular
- Union Cd: A
- Job Code: 857511
- PT Code: 3
- Job Title: Regnl Pub Affrs Mgr
- Bd Dt: 1983-04-25
- Seniority Dt: 1983-08-08
- End Dt: 2000-03-17
- Dt: SC8310
- Prop: SC8310
- Year EC:
- Contract End Dt:
- Location: Anaheim Base

This data is accurate as of: 2020-02-21