

**SOUTHERN CALIFORNIA GAS COMPANY**

**(DATA REQUEST CALADVOCATES-TB-SCG-2020-02)**

**DATE RECEIVED: March 20, 2020**

**DATE SUBMITTED: April 21, 2020 (question 12)**

**DATE SUBMITTED: April 24, 2020 (questions 6-8)**

**DATE SUBMITTED: April 28, 2020 (questions 1-2)**

**DATE SUBMITTED: May 8, 2020 (question 11 & amended question 2)**

**DATE SUBMITTED: June 22, 2020 (questions 3-5)**

**DATE SUBMITTED: June 25, 2020 (questions 9-10)**

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**OBJECTIONS TO “INSTRUCTIONS”**

1. SoCalGas objects to the Instructions and Definitions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Further, SoCalGas objects to the Instructions to the extent they purport to impose requirements exceeding that required by GO 66-D or the Discovery Custom and Practice Guidelines provided by the CPUC.
2. The highlighted paragraph under “Responses” purports to require SoCalGas identify “the person providing the answer to each question and his/her contact information.” SoCalGas objects to this instruction because it has no basis in the Commission’s Rules of Practice and Procedure and exceeds that required by the Discovery Custom and Practice Guidelines provided by the CPUC.
3. The highlighted portion of the paragraph under “Requests for Clarification” purports to require SoCalGas to notify Cal Advocates “within five (5) business days” if “a request, definition, or an instruction is unclear”; the highlighted paragraph under “Objections” purports to require SoCalGas to “submit specific objections, including the specific legal basis to the objection . . . within five (5) business days”; and the highlighted portion of the paragraph under “Assertions of Privilege” in the “Instructions” section of this Request further purports to require SoCalGas to “assert any privilege for documents responsive to this data request . . . within five (5) business days.” SoCalGas objects to these requirements as unduly burdensome and unreasonable as SoCalGas cannot determine which aspects of the Request need clarification, formulate objections or identify privileged information and documents until SoCalGas has otherwise completed its investigation and prepared its response to the Request.
4. The highlighted paragraph under “Sensitive Personal Identifying Information” purports to exclude from the category of properly redacted information the names of SoCalGas employees. SoCalGas objects to this request on the grounds that it is inconsistent with GO 66-D and unilaterally pre-judges the outcome of the GO 66-D procedures.
5. The first highlighted paragraph under “Signed Declaration” purports to require SoCalGas to provide “a signed declaration from a responsible officer or an attorney under penalty of perjury that [SoCalGas has] used all reasonable diligence in preparation of the data response, and that to the best of [his or her] knowledge, it is true and complete.” SoCalGas objects to this instruction because it has no basis in the Commission’s Rules of Practice and Procedure. SoCalGas further objects to the extent it purports to limit SoCalGas from amending its responses should additional information be later discovered. SoCalGas reserves its right to amend its responses to these requests should additional information relevant to SoCalGas’s responses is discovered at a later date.

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6. SoCalGas objects to the second highlighted paragraph under “Signed Declaration” to the extent it purports to impose requirements exceeding the process for submitting confidential information to the Commission outlined in GO 66-D § 3.
  7. In addition to the above objections, it should be noted that the data request is directed to SoCalGas and defines “you” to mean SoCalGas, and yet the request also seeks information from Sempra Energy. Except as noted, where Sempra has voluntarily provided information the responses herein are made for and on behalf of SoCalGas only. Nothing herein is intended to waive Sempra Energy’s right to object to requests with which it was served

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**QUESTION 1:**

Please provide all documents related to SoCalGas and Sempra training and reporting programs that are used to ensure compliance with the Sempra Energy Political Activities Policy (Policy). See Policy at Section 1, p. 1 (“the company has a robust training and reporting program in place to ensure compliance”).

**RESPONSE 1:**

SoCalGas objects to this question as overbroad and unduly burdensome. Notwithstanding this objection and the Objections to the Instructions which are expressly incorporated herein, SoCalGas responds as follows:

SoCalGas is providing SoCalGas’s formal group training presentations and text inserted into a computer program to train employees on the Sempra Energy Political Activities Policy. These materials were provided by Sempra Energy. See the attached zip folder titled “LATS Training Docs” that contains 25 documents and an excel sheet with a listing of all documents.

**Amended Response – Submitted May 8, 2020**

SoCalGas is re-submitting the training materials with no redactions, but rather including confidentiality markings and a confidentiality declaration.

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**QUESTION 2:**

Regarding the Policy's requirement at page 3 under "Lobbying" that all employees who engage in lobbying activities are required to report their activity in LATS, please explain what "LATS" is and all of the data fields it contains.

**RESPONSE 2:**

SoCalGas directs Cal Advocates to the documents produced in response to Question 1. As explained in the documents, LATS is the "Lobbying Activity Tracking System." The system serves as a centralized repository used for Sempra's collective political reporting purposes. The fields in LATS were provided by Sempra Energy and include:

**Lobbying Activity**

Name of Person Lobbied

Position of Person Lobbied

Title of Person Lobbied

Jurisdiction

Agency

Date Start/End

Number of Hours Spent Lobbying

Description

Expenses

Admin Testimony – can be checked

**Amended Response to the Lobbying Activity Fields – Submitted May 8, 2020**

Reporting For A Meeting With – you can check "One Person" or "More Than One Person"

At login you can check – "I'm reporting data for myself" or "entering data for someone else"

Additional Dynamic Fields – they appear if a specific field above is entered:

Proceeding Number (if Admin Testimony is checked at the top)

Name of Elected Official (if Position of Person Lobbied is "Elected Official Staff")

Office of Elected Official (if Position of Person Lobbied is "Elected Official Staff")

State (if State is jurisdiction)

County (if County is jurisdiction)

City (if City is jurisdiction)

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Note – When one logs into LATS, the system knows which employee is accessing the system and therefore when the LATS data is provided, the name of the employee who conducted the activity will be included. This is true even if the LATS entries were done by an admin on behalf of an employee, the employee's name who conducted the activity will be provided in the LATS data. Upon login, the system automatically records a record ID, proxy ID and Employee ID. There are also defunct fields in the system that cannot be filled out and have no data in the period of time requested.

### **Retained Lobbyist Firms/Organizations**

Firm

Invoice Number

Amount Paid

Percentage toward lobbying

Date paid

### **Gift of Business Courtesy**

Full Name of Recipient

Position of Recipient

Title of Recipient

Jurisdiction

Date of Gift or Event

Establishment

Gift Event Address

Gift Event City

Gift Event State

Gift Even Zip

Value/Cost of Gift Benefiting Only the Public Official

Total Value/Cost of the Entire Activity

Method of Payment

Describe the Gift

Office Address

Office City

Office State

Office Zip

Was guest specified by company?

Guest Name

Reimbursement Amount

Reimbursement Date

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**Personal Political Contributions**

Employee ID

Jurisdiction

Candidate or Ballot Measure Committee

Candidate Controlling the Ballot Measure Committee

Date of Contribution

Amount of Contribution

Check Number

Name of Fundraiser

**Political Fundraiser Request**

Full Name of Candidate

Current Office

Office Seeking

Jurisdiction

Election Date

Current Positions (Boards, Agencies, etc.)

Description

Employee Host

Date of the Event

Location

Costs

Business Unit covering the costs

Post Fundraiser Results – Amount Raised

Total Final Event Costs

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**Question 3:**

Please identify all SoCalGas and Sempra Energy employees who have LATS entries for activity between January 1, 2015 and today, and provide copies of all such LATS entries.

**Response 3:**

**SoCalGas's Response**

SoCalGas objects to this request on the grounds that it is compound and to the extent that it calls for the disclosure of information protected by the attorney-client privilege or the attorney work product doctrine.

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

Please see the attached document titled "SoCalGas LATS Entries\_Confidential" reflecting SoCalGas's LATS entries for activity between January 1, 2015 and April 30, 2020.

**Sempra's Response**

Sempra objects to the request for LATS entries on the basis that LATS entries are not created for the purpose of complying with any requirement by the California Public Utilities Commission ("CPUC"). Sempra objects also because the entries are not created for the purpose of complying with the accounting definition of "lobbying" that has been adopted by the Federal Energy Regulatory Commission and CPUC, in Account No 426.4. Sempra also objects because the LATS entries are not individually reported to any regulatory or governmental body, and do not necessarily reflect conduct that is reportable under federal, state, or local political-reporting laws. Sempra further objects to the extent the request seeks LATS entries that relate to administrative testimony or direct communications that do not mention SoCalGas, SoCalGas's facilities, or otherwise refer to natural-gas matters in California. Sempra further objects to the extent the request seeks LATS entries that involve administrative testimony or direct communications by Sempra employees for whom costs are "retained" at Sempra. Sempra objects to this request also because there is no active proceeding, and Sempra is not a public utility.

In the spirit of cooperation, Sempra has provided to SoCalGas -- for purposes of responding to this request -- LATS entries made by employees of SoCalGas during the relevant period. Sempra is also providing here LATS entries that:

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1. were made by employees of Sempra Energy (other than those for whom costs were “retained” at the time); and
  2. mention SoCalGas, SoCalGas’s facilities, or refer to natural gas in California.

For any LATS entry indicating that the communication at issue addressed additional matters, Sempra is providing a redacted entry that omits the portion of the entry that does not meet the foregoing criteria.

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**Question 4:**

Please identify all SoCalGas and Sempra Energy employees who have engaged in lobbying activities at any time between January 1, 2015 and today who do not have LATS entries, and explain why they do not have LATS entries.

**Response 4:**

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

On or about May 6, 2020, SoCalGas conferred with Cal Advocates (both verbally and in writing) regarding, amongst other things, its objections to the term “lobbying.” As a result of that meet and confer conference, and as memorialized in SoCalGas’s confirming letter of May 7, 2020, Cal Advocates indicated that SoCalGas should use the LATS training definitions for all responses and define lobbying to include activities that are either (1) lobbying OR (2) “influencing” activities. Cal Advocates stated that lobbying activity is any activity that would be included in LATS and directed SoCalGas to several pages of a LATS presentation. Ultimately, Cal Advocates specified that the operative definition of “lobbying” is “(1) . . . “[b]roadly defined as a communication with an elected or appointed official intended to influence legislative or administrative action; (2) administrative testimony; and (3) grassroots lobbying – public outreach.”

SoCalGas also objects to this request to the extent that it assumes that the LATS entries record, or are intended to record, all activities that qualify as “lobbying” as defined in Cal Advocates’ operative definition of the term. The LATS entries are meant to record activities that qualify as “lobbying” strictly for reporting purposes as that term is defined in the Sempra Political Activities Policy.

SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records which do not exist, or which have not been generated or created in its regular course of business, which obligation exceeds the requirements provided by the CPUC’s Discovery Custom and Practice Guidelines and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery request includes a statement that “the particular item or category [of records] has never existed”). See also A.05-04-020, In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc., Administrative Law Judge’s Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that “Verizon is not required to create new documents responsive to the data

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request”) (also available at 2005 WL 1866062); A.05-02-027, In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp., Administrative Law Judge’s Ruling Regarding ORA’s Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications “shall not be required to produce new studies specifically in response to this DR”) (also available at 2005 WL 1660395).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas instructs and trains its employees to record LATS entries strictly for reporting purposes pursuant to the Sempra Political Activities Policy. To the extent there are SoCalGas employees who engaged in lobbying activities (as that term is defined in the Sempra Political Activities Policy) at any time between January 1, 2015 and April 30, 2020 but who do not have LATS entries, SoCalGas does not know the reason the employee did not record their time into LATS and there is no practical or reliable way for SoCalGas to identify or ascertain who those employees are, due to the potential scope of employees (some of whom may no longer be in SoCalGas’s employ) and the breadth of the time frame.

**Sempra’s Response**

Please see Sempra’s response to Data Request Question No. 3. Sempra also objects on the general grounds set forth by SoCalGas.

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### Question 5:

Please identify all SoCalGas and Sempra Energy employees who have lobbied at any time between January 1, 2015 and today regarding issues related to decarbonization.

### Response 5:

#### SoCalGas's Response

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

On or about May 6, 2020, SoCalGas conferred with Cal Advocates (both verbally and in writing) regarding, amongst other things, its objections to the term "lobbying." As a result of that meet and confer conference, and as memorialized in SoCalGas's confirming letter of May 7, 2020, Cal Advocates indicated that SoCalGas should use the LATS training definitions for all responses and define lobbying to include activities that are either (1) lobbying OR (2) "influencing" activities. Cal Advocates stated that lobbying activity is any activity that would be included in LATS and directed SoCalGas to several pages of a LATS presentation. Ultimately, Cal Advocates specified that the operative definition of "lobbying" is "(1) . . . "[b]roadly defined as a communication with an elected or appointed official intended to influence legislative or administrative action; (2) administrative testimony; and (3) grassroots lobbying – public outreach."

SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records which do not exist, or which have not been generated or created in its regular course of business, which obligation exceeds the requirements provided by the CPUC's Discovery Custom and Practice Guidelines and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery request includes a statement that "the particular item or category [of records] has never existed"). See also A.05-04-020, In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc., Administrative Law Judge's Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that "Verizon is not required to create new documents responsive to the data request") (also available at 2005 WL 1866062); A.05-02-027, In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp., Administrative Law Judge's Ruling Regarding ORA's Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications "shall not be required to produce new studies specifically in response to this DR") (also available at 2005 WL 1660395).

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SoCalGas also objects to the term “decarbonization” as vague, ambiguous, overbroad and undefined.

SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to make a compilation, abstract, audit, or summary of or from the documents produced by SoCalGas, and the burden or expense of preparing or making it is substantially the same for Cal Advocates. Such an obligation exceeds the requirements provided by the CPUC’s Discovery Custom and Practice Guidelines, and California Code of Civil Procedure Section 2030.230.

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas refers Cal Advocates to the LATS entries records produced in response to Question 3, above, from which responsive information may be obtained, based on Cal Advocates’ own determination of what “decarbonization” means. SoCalGas also notes that SoCalGas’s LATS entries are meant to record activities that meet the reporting requirement under the Sempra Political Activities Policy.

**Sempra’s Response**

For the reasons set forth in response to Data Request No. 3, Sempra does not agree with the Cal Advocates’ definition of “lobbying” for regulatory purposes before the CPUC.

Nonetheless, Cal Advocates are free to review the LATS entries provided by Sempra to determine whether Cal Advocates believes any entry reflects lobbying related to decarbonization.

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### **QUESTION 6:**

Please explain how SoCalGas and Sempra decide whether an employee's work should be allocated to shareholders or ratepayers and who makes such a determination. If this determination varies by business unit, please explain the process for each business unit.

### **RESPONSE 6:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. SoCalGas further objects to the Request with respect to business unit determinations to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas' GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows:

Generally, SoCalGas employees charge their bi-weekly labor expenses based upon the appropriate accounting information for the specific activity or activities being supported. All labor expenses contain three pieces of information: a cost center, an internal order, and an expense type or cost element such as straight-time labor and overtime labor. Generally, the determination whether to allocate these expenses to ratepayers or shareholders is made by the business units, along with staff that works on SoCalGas' GRC. This determination is based on the nature of the labor activity as identified by the three accounting criteria described above and reflects management's determination of whether the costs are likely to be deemed operating costs by the Commission, including consideration of past GRC commission decisions and other precedent, if any.

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### **QUESTION 7:**

Please explain how SoCalGas and Sempra record the cost of employee work that is shareholder-funded, and the accounts where such time is recorded.

### **RESPONSE 7:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. For the purpose of responding to this question, SoCalGas defines “cost of employee work” as labor expenses. SoCalGas further objects to the Request to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas’ GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows:

As a preliminary matter, the method for recording costs (accounting) does not dictate ratemaking treatment. They are related, but not the same. As described in response to Question 6, SoCalGas classifies some employee labor as “shareholder” or “ratepayer” prior to developing its GRC forecasts; however, most employee labor is classified as “shareholder” or “ratepayer” during the GRC process. The accounting system utilizes internal orders to aggregate and classify costs to the appropriate FERC accounts as established by the Code of Federal Regulations. Costs for activities that are deemed “shareholder” are excluded from cost recovery proceedings such as the GRC. There are various methods for excluding “shareholder” costs from a GRC. The first method is to exclude internal orders that settle to FERC accounts that capture shareholder activities, such as account 426.4. Additionally, specific internal orders for activities that will be excluded from the GRC are established and flagged for removal. Still further, other costs such as the Sacramento office that supports SoCalGas and SDG&E operations, charges its labor activities to a cost center unique to that organization and that entire cost center is excluded from the GRC. During the financial analysis phase of the GRC, the business unit and the GRC team remove these costs from the GRC request based upon the cost center number used to record these costs.

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Another example can be found in the TY2019 GRC workpapers of SoCalGas witness Lisa Alexander Exh. SCG-21-WP. The witness team made adjustments to remove incurred costs that were identified as potentially lobbying related activities based upon the FERC definition of lobbying. These adjustments can be found on pages 16-17, 25-26, 34-35, and 41.

<https://www.socalgas.com/regulatory/documents/a-17-10-008/SCG-21-WP%20LAlexander%20Customer%20Services%20-%20Technologies,%20Policies%20&%20Solutions.pdf>

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**QUESTION 8:**

Please explain how SoCalGas and Sempra record the cost of employee work that is ratepayer-funded, and the accounts where such time is recorded.

**RESPONSE 8:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. SoCalGas further objects to the Request to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas' GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows: Please see Responses to Questions 6 and 7.

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DATE SUBMITTED: June 25, 2020 (questions 9-10)

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### **QUESTION 9:**

For all SoCalGas and Sempra Employees who have lobbied at any time between January 1, 2015 and today on behalf of either organization, please identify by each employee and for each year the portion of their time allocated to ratepayer-funded lobbying, and quantify the monetary value of that work for each employee by year.

### **RESPONSE 9:**

#### **SoCalGas's Response**

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

On or about May 6, 2020, SoCalGas conferred with Cal Advocates (both verbally and in writing) regarding, amongst other things, its objections to the term "lobbying." As a result of that meet and confer conference, and as memorialized in SoCalGas's confirming letter of May 7, 2020, Cal Advocates indicated that SoCalGas should use the LATS training definitions for all responses and define lobbying to include activities that are either (1) lobbying OR (2) "influencing" activities. Cal Advocates stated that lobbying activity is any activity that would be included in LATS and directed SoCalGas to several pages of a LATS presentation. Ultimately, Cal Advocates specified that the operative definition of "lobbying" is "(1) . . . "[b]roadly defined as a communication with an elected or appointed official intended to influence legislative or administrative action; (2) administrative testimony; and (3) grassroots lobbying – public outreach."

SoCalGas also objects to this request to the extent that it effectively pre-litigates the next General Rate Case (GRC). The allocations and valuations that Cal Advocates requests for 2017 to present are not litigated until the next GRC where the 5- year historical period of actual costs is examined. As such, this request, in its current scope, is premature because the ultimate funding for activities from 2017 to present has not yet been "allocated."

SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records which do not exist, or which have not been generated or created in its regular course of business, which obligation exceeds the requirements provided by the CPUC's Discovery Custom and Practice Guidelines, and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery request includes a statement that "the particular item or category [of records] has never existed"). See also A.05-04-020, In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc., Administrative Law Judge's Ruling Addressing Motion of

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Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that “Verizon is not required to create new documents responsive to the data request”) (also available at 2005 WL 1866062); A.05-02-027, In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp., Administrative Law Judge’s Ruling Regarding ORA’s Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications “shall not be required to produce new studies specifically in response to this DR”) (also available at 2005 WL 1660395). Specifically, SoCalGas also objects to the extent that the request assumes, without foundation, that SoCalGas creates or keeps records or information in the ordinary course of business that track “lobbying” activities as that term is defined by Cal Advocates.

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas does not create or keep records or information in the regular course of its business that provide answers to the questions posed.

**Sempra’s Response**

Sempra incorporates herein the objections set forth in response to Data Request No. 3.

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### **QUESTION 10:**

For all SoCalGas and Sempra Employees who have lobbied at any time between January 1, 2015 and today on behalf of either organization, please identify by each employee and for each year the portion of their time allocated to shareholder-funded lobbying, and quantify the monetary value of that work for each employee by year.

### **RESPONSE 10:**

Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023

### **SoCalGas's Response**

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

On or about May 6, 2020, SoCalGas conferred with Cal Advocates (both verbally and in writing) regarding, amongst other things, its objections to the term “lobbying.” As a result of that meet and confer conference, and as memorialized in SoCalGas’s confirming letter of May 7, 2020, Cal Advocates indicated that SoCalGas should use the LATS training definitions for all responses and define lobbying to include activities that are either (1) lobbying OR (2) “influencing” activities. Cal Advocates stated that lobbying activity is any activity that would be included in LATS and directed SoCalGas to several pages of a LATS presentation. Ultimately, Cal Advocates specified that the operative definition of “lobbying” is “(1) . . . “[b]roadly defined as a communication with an elected or appointed official intended to influence legislative or administrative action; (2) administrative testimony; and (3) grassroots lobbying – public outreach.”

SoCalGas also objects to this request to the extent that it effectively pre-litigates the next General Rate Case (GRC). The allocations and valuations that Cal Advocates requests for 2017 to present are not litigated until the next GRC where the 5- year historical period of actual costs is examined. As such, this request, in its current scope, is premature because the ultimate funding for activities from 2017 to present has not yet been “allocated.”

SoCalGas further objects to this request to the extent that it imposes upon SoCalGas an obligation to generate or create records which do not exist, or which have not been generated or created in its regular course of business, which obligation exceeds the requirements provided by the CPUC’s Discovery Custom and Practice Guidelines, and California Code of Civil Procedure Section 2031.230 (proper response stating inability to comply with discovery

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request includes a statement that “the particular item or category [of records] has never existed”). See also A.05-04-020, In the Matter of the Joint Application of Verizon Communications Inc. and MCI, Inc., Administrative Law Judge’s Ruling Addressing Motion of Qwest to Compel Responses, Aug. 5, 2005, at p. 7 (in relation to motion to compel emphasized that “Verizon is not required to create new documents responsive to the data request”) (also available at 2005 WL 1866062); A.05-02-027, In the Matter of the Joint Application of SBC Communications Inc. and AT&T Corp., Administrative Law Judge’s Ruling Regarding ORA’s Second Motion to Compel, June 8, 2005, at p.23 (in ruling on motion to compel stressed that SBC Communications “shall not be required to produce new studies specifically in response to this DR”) (also available at 2005 WL 1660395). Specifically, SoCalGas also objects to the extent that the request assumes, without foundation, that SoCalGas creates or keeps records or information in the ordinary course of business that track “lobbying” activities as that term is defined by Cal Advocates.

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Based on available information and records, for 2015:

	<b>% of Time</b>	<b>Direct Expense</b>
	1%	\$
	1%	\$
	6%	\$
	1%	\$

Based on available information and records, for 2016:

	<b>% of Time</b>	<b>Direct Expense</b>
	1%	\$
	1%	\$
	4%	\$
	27%	\$
	1%	\$
	1%	\$
	<1%	\$

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In addition, please see the publicly filed Workpapers To Prepared Direct Testimony Of Lisa M. Larroque Alexander On Behalf Of Southern California Gas Company Before The Public Utilities Commission Of The State Of California (October 2017), at pp. 17, 26, 34-35 and 41, which show 2015 and 2016 adjustments reflecting removal of costs related to lobbying.

<https://www.socalgas.com/regulatory/documents/a-17-10-008/SCG-21-WP%20LAlexander%20Customer%20Services%20-%20Technologies,%20Policies%20&%20Solutions.pdf>

As discussed, SoCalGas makes ratepayer/shareholder allocations for lobbying at the time of the GRC. Accordingly, with respect to the funding for activities for years 2017, 2018, 2019 and 2020, those have not yet been allocated to ratepayers or shareholders and will not be allocated until the next GRC. Hence, this question asks for allocations that are not currently available.

As explained in its response to Question 7 of this set of data requests, the method of recording costs (its accounting treatment) does not dictate its ratemaking treatment in the next GRC. For 2017, 2018, and 2019, SoCalGas does have information about how certain lobbying costs have been recorded (their accounting treatment). SoCalGas notes that it has filed with the CPUC Spending Accountability Reports for years 2017, 2018 and 2019. In the course of preparing said Spending Accountability Reports, SoCalGas gathered data that yielded the percentage of time spent by certain SoCalGas employees engaged in lobbying activities which are currently recognized as a below the line (BTL) expense for SoCalGas (i.e., a nonoperating expense on SoCalGas's regulatory income statement). As noted in its response to question 7, this data does not necessarily determine the ratemaking allocations that will ultimately be made in connection with the next GRC. Moreover, the data gathered is subject to revision. Nevertheless, this accounting data is provided below in the interest of transparency:

2017 Lobbying Activities Treated as BTL Expense:

	<b>% of Time</b>	<b>Direct Expense</b>
	1%	
	<1%	
	<1%	
	1%	
	<1%	

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2018 Lobbying Activities Treated as BTL Expense:

	<b>% of Time</b>	<b>Direct Expense</b>
	1%	\$
	<1%	\$
	1%	\$
	1%	\$

2019 Lobbying Activities Treated as BTL Expense:

	<b>% of Time</b>	<b>Direct Expense</b>
Alan Caldwell	81%	\$
	<1%	\$
	26%	\$
Chris Gilbride	<1%	\$
	<1%	\$
	<1%	\$
Deanna Haines	2%	\$
	4%	\$
	2%	\$
George Minter	168% <sup>1</sup>	\$
	5%	\$
	14%	\$
	2%	\$
	15%	\$
	53%	\$
	166% <sup>2</sup>	\$
	1%	\$
	<1%	\$
	3%	\$
	22%	\$

<sup>1</sup> This is over 100% is due to journal entries that were entered in 2019 to correct how 2018 incurred expenses were accounted for.

<sup>2</sup> This is over 100% is due to journal entries that were entered in 2019 to correct how 2018 incurred expenses were accounted for.

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[REDACTED]	1%	\$ [REDACTED]
[REDACTED]	5%	\$ [REDACTED]
[REDACTED]	5%	\$ [REDACTED]
[REDACTED]	10%	\$ [REDACTED]
[REDACTED]	4%	\$ [REDACTED]
[REDACTED]	2%	\$ [REDACTED]
[REDACTED]	24%	\$ [REDACTED]

**Sempra's Response**

See Sempra's objections set forth in response to Data Request No. 3, and Sempra's response to Data Request No. 9.

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**QUESTION 11:**

Please provide a fully executed copy of the entire contractual agreement between SoCalGas and Marathon Communications Inc. including the confidentiality provision which prevents SoCalGas from releasing the prices that Marathon charges for their services without being in breach of contract. Please also provide supporting documentation to demonstrate that this contract is binding on SoCalGas and has not been superseded by any other contract.

**RESPONSE 11:**

SoCalGas objects to the question to the extent that it calls for a legal conclusion and is not aimed at obtaining factual information.

The above question does not specify what contract with Marathon Communications Inc. is the subject of the question. SoCalGas answers this question pertaining to two contracts that have been provided in previous responses:

Contract #566052135 – provided in DR-1

This contract was amended five times (amendments produced in response to DRs 1 and 5)

Contract #5660049620 – provided in DR-12

The contracts were not superseded by a later contract.

Notwithstanding that objection, SoCalGas clarifies that it does not opine on the merits of potential liability under any particular legal theory, contractual or otherwise. With respect to the factual portion of the question posed, SoCalGas would not release the prices that Marathon charges for their services because disclosure of market sensitive information such as vendor pricing may increase the costs to SoCalGas and its ratepayers, and SoCalGas considers such information to be protected under Paragraph 27 of the agreement. It is established that pricing information of third-party vendors and contractors is entitled to confidential treatment. See, e.g., D. 14-12-053, 2014 WL 7437489, at \*6-8 (Cal. P.U.C. Dec. 18, 2014) (granting motion to seal “the contents of an ex parte communication containing pricing data from a third party vendor,” the public disclosure of which would put the regulated entity “at a competitive disadvantage”); D.11-01-036, 2011 WL 660568 (Cal. P.U.C. Jan. 27, 2011) (granting motion to seal “confidential prices and contract terms specifically negotiated with a program vendor, and protected by a confidentiality agreement in [the regulated utility’s] contracts with its vendors” which the utility represented was “proprietary and commercially

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sensitive, and should remain confidential”); *id* (noting that the Commission has “granted similar requests” to seal similar information “in the past”). Further, it is industry custom among regulated energy utility companies to treat as confidential pricing terms entered into with third-party vendors. See Proposed Confidentiality Matrix prepared by Joint Energy Utilities dated March 29, 2018, at 28 (proposing to treat as presumptively confidential “[v]endor bid and pricing information (including rates and invoices); and “vendor proprietary information”); see *also* Communications Industry Confidentiality Matrix, R. 14-11-001, at 6 (filed Oct. 3, 2017) (proposing to treat as presumptively confidential “[c]ontracts and agreement between or among . . . vendors and/or third parties” because “parties to such contracts agree that the terms are confidential, and most contracts contain express provisions to that effect”). It is also well established that certain pricing is deemed to be competitively sensitive information and that the disclosure or exchange of competitively sensitive information, such as pricing, potentially raises antitrust concerns. See Antitrust Guidelines for Collaborations Among Competitors [https://www.ftc.gov/sites/default/files/documents/public\\_events/joint-venture-hearings-antitrust-guidelines-collaboration-among-competitors/ftcdojguidelines-2.pdf](https://www.ftc.gov/sites/default/files/documents/public_events/joint-venture-hearings-antitrust-guidelines-collaboration-among-competitors/ftcdojguidelines-2.pdf). The Federal Trade Commission has also prosecuted the exchange of sensitive business information even though the conduct did not meet the standards for the Sherman Antitrust Act. See, e.g., <https://www.ftc.gov/enforcement/cases-proceedings/1210184/bosley-inc-aderans-america-holdings-inc-aderans-co-ltd>.

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**QUESTION 12:**

For the period between January 1, 2015 and today, please provide all documents submitted to the to the California Public Utilities Commission pursuant to General Order 77 by SoCalGas and Sempra Energy, including both the public and confidential versions of such submissions. To the extent such submissions are available on the company's website, you may provide a link to that information.

**RESPONSE 12:**

Notwithstanding the Objections to the Instructions which are expressly incorporated here in, SoCalGas [and Sempra] respond[s] as follows: The reports that have been submitted since January 1, 2015 include reports for years 2014-2018. The public versions of these reports for SoCalGas years 2016, 2017 and 2018 can be found at:  
<https://www.cpuc.ca.gov/General.aspx?id=6442454119>.

The public versions for years 2014 and 2015 are attached.

Confidential versions of SoCalGas's GO 77-M reports for 2014-2018, with an accompanying confidentiality declaration are attached.

**The attachments include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.**

Sempra Energy does not submit a separate GO 77-M report.