

# DECLARATION 4

**DECLARATION OF [REDACTED]**

I, [REDACTED], declare and state as follows:

1. I am a resident of California over 18 years of age, and my statements herein are based on personal knowledge.

2. I am the Managing Partner of [REDACTED]. I have worked in this capacity for [REDACTED] as a Managing Partner for 17 years. As a Managing Partner, I provide professional government relations services and advice in support of companies' policy, legislative, and regulatory objectives.

3. [REDACTED] entered into a contract with Southern California Gas ("SoCalGas") on January 1, 2018 to provide professional government relations services and advice in support of SoCalGas' natural gas related political interests.

4. Under the contract, [REDACTED] provided services including, but not limited to,

[REDACTED]

5. I am submitting this Declaration in Support of in Support of SoCalGas' Motion for Reconsideration/Appeal to the Full Commission of Administrative Law Judge's Ruling in the Discovery Dispute Between Public Advocates Office and Southern California Gas Company, October 7, 2019 (Not in a Proceeding) issued on November 1, 2019 because I can unequivocally state that if the non-public communications I have had regarding [REDACTED] contract with SoCalGas are ordered to be disclosed in response to the demand of the California Public Advocates Office, it will drastically alter how I associate with SoCalGas in the future. Indeed, my understanding is that these non-public communications regarding the contract and other sensitive information will be disclosed to the California Public Advocates Office under protest on December 4, 2019. These disclosures have

made me reconsider whether I want to work and associate with SoCalGas in the future.

6. In connection with SoCalGas' legislative, policy, regulatory and political participation in the State of California to advance natural gas solutions, I often communicated with SoCalGas, its employees, and its shareholders about matters of public debate.

7. In the future, I will be less willing to engage in such association with SoCalGas knowing that my views and communications may be disclosed simply because of my association with SoCalGas in connection with its political efforts.

[REDACTED]

[REDACTED] This, of course, make me consider whether to associate with SoCalGas in future initiatives, rulemaking, or any other political process.

8. My work with SoCalGas included sensitive discussions in furtherance of developing strategy for pursuing political goals and selecting a message and the best means to promote that message. It also included recommending that others become involved with SoCalGas in the political process. Because of the forced disclosure to the California Public Advocates Office, I am concerned I will suffer negative consequences—including disclosure to my competitors of sensitive strategic information, the cost of responding to inquiries, and the breach of privacy that comes with disclosure of my thoughts, processes, decisions, and strategies. As a result of the disclosures to the California Public Advocates Office (and likelihood of its additional demands for disclosure), I am reluctant to continue associating with SoCalGas and am seriously considering limiting my association with SoCalGas in the future.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 27, 2019.

[Redacted Signature]

[Redacted] Managing Partner

# DECLARATION 5

**DECLARATION OF** [REDACTED]

I, [REDACTED] declare and state as follows:

1. I am a resident of California over 18 years of age, and my statements herein are based on personal knowledge.

2. I am employed by [REDACTED] as President. I have worked as President of [REDACTED] since October 2013. As President of [REDACTED] my professional duties include public affairs and assisting clients with public messaging.

3. I entered into a contract with Southern California Gas (SoCalGas) on or about August 10, 2019. As a part of this contract, [REDACTED]  
[REDACTED]  
[REDACTED]

4. I am submitting this Declaration in Support of SoCalGas' Motion for Reconsideration/Appeal to the Full Commission of Administrative Law Judge's Ruling in the Discovery Dispute Between Public Advocates Office and Southern California Gas Company, October 7, 2019 (Not in a Proceeding) issued on November 1, 2019 because I can unequivocally state that if the non-public contract I have with SoCalGas regarding the public affairs work I am doing with the company is ordered to be disclosed in response to the demand of the California Public Advocates Office, it will drastically alter how I communicate in the future. Indeed, my understanding is that the [REDACTED] contract has already been disclosed to the California Public Advocates Office. This disclosure has made me less willing to work and associate with SoCalGas in the future.

5. In connection with SoCalGas' [REDACTED]

[REDACTED] I often communicated with SoCalGas and its employees.

6. I helped formulate strategy regarding [REDACTED]  
[REDACTED]

7. In the future, I will be less willing to engage in such contracts and communications knowing that my non-public association with SoCalGas has been disclosed simply because of my association with SoCalGas in connection with [REDACTED] [REDACTED] solutions. I also am seriously considering whether to associate with SoCalGas in future regarding public affairs work.

8. I entered into a contract with SoCalGas in furtherance of [REDACTED] [REDACTED] Because of the forced disclosure of this contract to the California Public Advocates Office, I am concerned I will suffer negative consequences—including financial and strategic information being released to my competitors, the cost of responding to inquiries, and the breach of privacy that comes with disclosure of my contract. Of course, this disclosure also will hinder [REDACTED] [REDACTED] goals I shared with SoCalGas. As a result of the disclosures to the California Public Advocates Office (and likelihood of its additional demands for disclosure), I am reluctant to continue associating with SoCalGas and am seriously considering limiting my association with SoCalGas in the future.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 29, 2019.

[REDACTED]

# DECLARATION 6

DECLARATION OF [REDACTED]

I, [REDACTED] declare and state as follows:

1. I am a resident of California over 18 years of age, and my statements herein are based on personal knowledge.

2. I cofounded [REDACTED] more than six years ago and serve as one of its Principals.

3. I entered into a contract with Southern California Gas (SoCalGas) on or about in October 2019. As a part of this contract, [REDACTED]  
[REDACTED]  
[REDACTED]

4. I am submitting this Declaration in Support of SoCalGas' Motion for Reconsideration/Appeal to the Full Commission of Administrative Law Judge's Ruling in the Discovery Dispute Between Public Advocates Office and Southern California Gas Company, October 7, 2019 (Not in a Proceeding) issued on November 1, 2019 because I can unequivocally state that if the non-public contract I have with SoCalGas regarding the public affairs work I am doing with the company is ordered to be disclosed in response to the demand of the California Public Advocates Office, it will drastically alter how I communicate in the future. Indeed, my understanding is that the [REDACTED] contract has already been disclosed to the California Public Advocates Office.

5. In the future, I will be less willing to engage in communications knowing that my non-public association with SoCalGas and private discussions and views may be (and have been) disclosed simply because of my association with SoCalGas in connection with its efforts to petition the government on political matters related to, among other things, rulemaking. I also am seriously considering whether to associate with SoCalGas in future regarding ballot initiatives,

rulemaking, or any other political process due to the breach of privacy that comes with disclosure of my thoughts, processes, decisions, and strategies.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 29, 2019.

A large black rectangular redaction box covering the signature area.A smaller black rectangular redaction box covering the name area.

# EXHIBIT N

---

**From:** Kao, Valerie <valerie.kao@cpuc.ca.gov>  
**Sent:** Wednesday, March 25, 2020 2:12 PM  
**To:** CarmelitaM@greenlining.org; CCormany@EfficiencyFirstCa.org; hchoy@isd.lacounty.gov; Jennyb@abag.ca.gov; jon@McHughEnergy.com; Ettenson, Lara; pmiller@nrdc.org; sephra.ninow@energycenter.org; dgilligan@naesco.org; 'RobF@ncihvac.com'; KAnderson@OccamsConsulting.com; John@greenfan.co; Policy@PowerTakeOff.com; justin@SimpleEnergy.com; Mona.Tierney-Lloyd@Enel.com; Jones, Holly A; Anne@Enervee.com; paul@synergy.org; 'douglass@energyattorney.com'; 'douglass@energyattorney.com'; Angela.Whatley@sce.com; julie.wiley@sandag.org; fortlieb@sandiego.gov; Martin, Erica L; godero@goreadusa.org; cdailey@wrcog.us; Matt.Clark@SynergyCompanies.org; Alejandra.Tellez@ventura.org; APrice@CECmail.org; AWatkins@Co.Santa-Barbara.ca.us; tkeith@co.slo.ca.us; CKalashian@pesc.com; erussell@ambag.org; MGardner@Resource-Innovations.com; Steve Schmidt; adam@gridium.com; JEggemeyer@SMCgov.org; Abhay@bidgely.com; Theresa.Cho@sfcityatty.org; Clay, Christopher; brightline.cpuc@brightlinedefense.org; hayley@turn.org; 'James@UtilityAdvocates.org'; jguild@enovity.com; 'RossN@BlueGreenAlliance.org'; Jennifer.ReyesLagunero@pge.com; LKoehler@edf.org; FJackson.Stoddard@MorganLewis.com; 'ekahl@buchalter.com'; 'NSheriff@Buchalter.com'; California@Oracle.com; BCragg@GoodinMacBride.com; skrasnow@firstfuel.com; VidhyaPrabhakaran@dwt.com; steven@moss.net; RFried@AALRR.com; Chaz511@comcast.net; JerryL@abag.ca.gov; Policy@CEDMC.org; Alison.Seel@SierraClub.org; bruce@builditgreen.org; EastBayEnergyWatch@stopwaste.org; Jim Kelsey; kcornish@energy-solution.com; california.regulatory@codecycle.com; Hatton@RisingSunEnergy.org; MCallahan@mceCleanEnergy.org; Carmen Best; Cori.Jackson@CaEnergyAlliance.org; CPerkins@EnergyCoalition.org; maldridge@ecoact.org; NReardon@SonomaCleanPower.org; Suzanne.Smith@RCPA.ca.gov; mmarshall@redwoodenergy.org; KMessner@aham.org; Eric@CoalitionofEnergyUsers.org; jim.hawley@deweysquare.com; 'Wynne@BraunLegal.com'; Fernandez@BraunLegal.com; TEnslow@adamsbroadwell.com; TEnslow@adamsbroadwell.com; TEnslow@adamsbroadwell.com; john@clfp.com; kmills@cfbf.com; Kathleen Carlson; 'Robert@RMA-energy.com'; jbelais@neea.org; 'SamS@jacoinc.net'; lwebster@facilityenergysolutions.com; tom@ucons.com; jake@energysavvy.com; Lu, Aaron N; Alex.Kang@itron.com; Alex.Porteshawver@energycenter.org; aricklefs@energycoalition.org  
**Cc:** ALJ\_Support ID; ALJ Docket Office; ALJ Process  
**Subject:** [EXTERNAL] R1311005 email ruling clarifying scope of order to show cause and providing further instructions for hearing

\*\*\* EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information \*\*\*

To the service list of Rulemaking 13-11-005 (energy efficiency policy rulemaking),

This email ruling clarifies the proceeding scope established in the March 2, 2020 *Assigned Commissioner's Ruling Setting the Scope and Schedule for the Order to Show Cause Against Southern California Gas Company*. The factual questions to be addressed in this order to show cause (OSC) are:

1. Whether Respondent booked any expenditures to its Demand Side Management Balancing Account, and associated allocated overhead costs, to advocate against more stringent codes and standards during any period of time between 2014 and 2017 (inclusive); and

2. Whether Respondent ever used ratepayer funds, regardless of the balancing account or other accounting mechanism to which such funds were booked, to advocate against local governments' adoption of reach codes.

Additionally, in response to the March 13, 2020 *Joint Comments of the Public Advocates Office and Sierra Club on the Assigned Commissioner's Ruling Setting the Scope and Schedule for the Order to Show Cause Against Southern California Gas Company*, this email ruling confirms that the schedule does not provide for written testimony. Parties may seek admission of material facts via written motion or during evidentiary hearing.

Parties' witness lists and cross examination estimates must be served no later than August 20, 2020 and shall list all exhibits intended to be introduced during evidentiary hearing. A witness shall introduce/sponsor every exhibit. Parties shall serve copies of any exhibits they intend to use during evidentiary hearing no later than August 20, 2020.

IT IS SO RULED.

**The Commission's Docket Office shall formally file this email ruling.**

[Note: I have divided distribution of this email ruling into segments to avoid rejection by servers.]

**Valerie U. Kao**

Administrative Law Judge

California Public Utilities Commission

[valerie.kao@cpuc.ca.gov](mailto:valerie.kao@cpuc.ca.gov)

Pronouns: she, her, hers

Notice: This communication may contain confidential and/or legally privileged information for the use of the intended recipient(s). Unauthorized use or disclosure is prohibited. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

---

This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.