

**ORDER INSTITUTING RULEMAKING ON BUILDING DECARBONIZATION  
(R.19-01-011)**

**SOUTHERN CALIFORNIA GAS COMPANY  
(DATA REQUEST CAL ADVOCATES SCG-2019-03)**

**DATE RECEIVED: July 16, 2019**

**DATE SUBMITTED: July 18, 2019**

**Date Submitted Following August 12, 2019 Meet and Confer: August 13, 2019**

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**QUESTION 1:**

Referencing SoCalGas's amended response to Question 5b of Public Advocates Office-SCG-051719, on what date did SoCalGas make changes to its billing protocol to start billing to internal Cost Center 2200-2441 in SoCalGas's General Rate Case? Please provide supporting documentation.

**RESPONSE 1:**

Question 5 b of Data Request CALPA-SCG-051719 asks, "For each invoice and contract provided in response to Question 5, identify: ...

b. The funding source used (e.g. GRC funds, specific balancing accounts, etc.)," and SoCalGas' amended response to Question 5b of Data Request CALPA-SCG-051719 states, "The funding source is the distinct shareholder-funded I/O described in response to Question 3.c."

For purposes of providing a response, SoCalGas understands Public Advocates Office intends to ask about SoCalGas' decision to bill costs from Standard Services Agreement No. 5660052135 to internal Cost Center 2200-2441. That decision was made at the time the contract was entered because the scope of work commissioned by the agreement was for customer outreach and support services for SoCalGas to ascertain customer perspective and how SoCalGas could best represent customer and ratepayer interests in regulatory proceedings addressing the future use of gas as an energy source. As stated in the responses to Data Request CALADVOCATES-SC-SCG-2019-02 and amended responses to Data Request CALPA-SCG-051719, it was intended that work and expenses related to founding and supporting the organization that came to be known as Californians for Balanced Energy Solutions would not be ratepayer funded and instead would be shareholder funded. The initial scope of work for Standard Services Agreement No. 5660052135 did not pertain to this organization. However, the agreement was subsequently amended to add an additional scope of work for the founding and support of Californians for Balanced Energy Solutions. Even after this amendment, work for SoCalGas (exclusive of work to found and support Californians for Balanced Energy Solutions) continued. For this reason, fees and expenses associated with the agreement were allocated between ratepayers and shareholders. As further stated in the amended responses to Data Request CALPA-SCG-051719, SoCalGas subsequently determined that, in order to prevent further distraction from the important issues in R.19-01-011, *Order Instituting Rulemaking*

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*Regarding Building Decarbonization*, all work done pursuant to Standard Services Agreement No. 5660052135 would be paid for by shareholders.

See attached documentation.

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**QUESTION 2:**

Referencing SoCalGas's amended response to Question 5b of Public Advocates Office-SCG-051719, on what date did SoCalGas determine shareholders should pay 100% of the Marathon Communications invoices? Please provide supporting documentation.

- a. State the basis for SoCalGas's determination that only shareholders should pay the Marathon invoices.

**RESPONSE 2:**

Question 5 b of Data Request CALPA-SCG-051719 asks, "For each invoice and contract provided in response to Question 5, identify: ...

- b. The funding source used (e.g. GRC funds, specific balancing accounts, etc.)," and SoCalGas' amended response to Question 5b of Data Request CALPA-SCG-051719 states, "The funding source is the distinct shareholder-funded I/O described in response to Question 3.c."

For purposes of providing a response, SoCalGas understands Public Advocates Office intends to ask about the timing of SoCalGas' determination to allocate 100% of the cost of Standard Services Agreement No. 5660052135, as amended from time to time, and invoices to shareholders, SoCalGas determined to allocate all fees and expenses associated with the subject invoices to shareholders on July 12, 2019. As stated in our responses to Data Request CALADVOCATES-SC-SCG-2019-02, this decision was made in order to prevent further distraction from the important issues in R.19-01-011, *Order Instituting Rulemaking Regarding Building Decarbonization*. Although the Public Advocates Office has served this data request, and the 2 preceding data requests, outside the parameters of any proceeding, it has shared SoCalGas' discovery responses with Sierra Club and has introduced SoCalGas' discovery responses in R.19-01-011 (as did Sierra Club), even though they simply are not relevant to the scope of that proceeding and serve to circumvent the role of the presiding Administrative Law Judges to render decisions on pending motions filed by Sierra Club in that proceeding. This is just the scenario SoCalGas was concerned about and explained to the Public Advocates Office during a meet-and-confer call on June 4, 2019, when SoCalGas requested to delay responses to Data Request CALPA-SCG-051719 until Sierra Club's pending motions in R.19-01-011 had been ruled on. The Public Advocates Office declined to so agree. This issue continues unnecessarily to detract from R.19-01-011

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so, SoCalGas determined all work done pursuant to Standard Services Agreement No. 5660052135 would be paid for by shareholders.

Further, to be clear, SoCalGas determined shareholders *would* bear the costs of the subject contract and invoices, not that shareholders *should* bear the costs. While some work performed under the subject contract and invoices was for Californians for Balanced Energy Solutions, and thus was intended to be shareholder funded, work was also done for SoCalGas in order for SoCalGas to serve its customers, as described herein and in response to Questions 3 and 6 of Data Request CALADVOCATES-SC-SCG-2019-02. This latter work appropriately *should* be ratepayer funded. However, for the above-cited reasons, SoCalGas has determined it would be shareholder funded.

There is no supporting documentation of the determination as the determination was not made by or with documents.

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**QUESTION 3:**

Referencing SoCalGas's amended response to Question 5b of Public Advocates Office-SCG-051719, on what date did SoCalGas reverse charges billed to internal Cost Center 2200-2441 in SoCalGas's General Rate Case? Please provide supporting documentation.

**RESPONSE 3:**

Question 5 b of Data Request CALPA-SCG-051719 asks, "For each invoice and contract provided in response to Question 5, identify: ...

b. The funding source used (e.g. GRC funds, specific balancing accounts, etc.)," and SoCalGas' amended response to Question 5b of Data Request CALPA-SCG-051719 states, "The funding source is the distinct shareholder-funded I/O described in response to Question 3.c."

For purposes of providing a response, SoCalGas understands Public Advocates Office intends to ask when charges pertaining to Standard Services Agreement No. 5660052135, as amended from time to time, were transferred from internal Cost Center 2200-2441. Charges initially were transferred in the accounting system from Cost Center 2200-2441 on June 14, 2019. Additional transfers will occur in the accounting system as a result of SoCalGas' July 12, 2019 decision to have all charges related to Standard Services Agreement No. 5660052135 be funded by shareholders.

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**QUESTION 4:**

Referencing SoCalGas's original response to Question 4a of Public Advocates Office-SCG-051719, when did SoCalGas determine that 50% of each invoice would be ratepayer funded? Please provide supporting documentation.

**RESPONSE 4:**

SoCalGas objects to this question on the basis that the response referenced in the question was superseded with amended responses on July 12, 2019. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

As stated in the responses to Data Request CALADVOCATES-SC-SCG-2019-02 and amended responses to Data Request CALPA-SCG-051719, it was always intended that work and expenses related to founding and supporting the organization that came to be known as Californians for Balanced Energy Solutions would not be ratepayer funded and instead would be shareholder funded.

There is no supporting documentation of the determination as the determination was not made by or with documents.

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**QUESTION 5:**

Referencing SoCalGas's original response to Question 4a of Public Advocates Office-SCG-051719, on what date did SoCalGas make changes to its billing protocol to charge 50% of each invoice to ratepayers? Please provide supporting documentation.

**RESPONSE 5:**

SoCalGas objects to this question on the basis that the response referenced in the question was superseded with amended responses on July 12, 2019. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

As noted in response to Question 1 herein, fees and expenses for Standard Services Agreement No. 5660052135 were initially allocated to internal Cost Center 2200-2441 because the scope of work commissioned by the agreement was for customer outreach and support services for SoCalGas to ascertain customer perspective and how SoCalGas could best represent customer and ratepayer interests in regulatory proceedings addressing the future use of gas as an energy source. The initial scope of work did not pertain to founding or supporting the organization that came to be known as Californians for Balanced Energy Solutions; however, the agreement was subsequently amended to add an additional scope of work for the founding and support of Californians for Balanced Energy Solutions. Even after this amendment, work for SoCalGas (exclusive of work to found and support Californians for Balanced Energy Solutions) continued. As noted hereinabove, it was always intended that work to found or support Californians for Balanced Energy Solutions would not be ratepayer funded. For this reason, fees and expenses associated with the agreement were allocated between ratepayers and shareholders. The allocation described in the original response to Question 4a was completed in the accounting system on June 14, 2019.

Please see attached documentation.