



**Public Advocates Office**  
California Public Utilities Commission

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**PUBLIC ADVOCATES OFFICE DATA REQUEST**  
**No. CalAdvocates-AW-SCG-2020-01**

Date: February 14, 2020

Response Requested: **Monday, March 2, 2020**

To: **Corinne Sierzant** Phone: (213) 244-5354  
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**INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure within ten (10) business days.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by the due date, notify the Public Advocates Office within five (5) business days, with a written explanation as to why the response date cannot be met and a best estimate of when the

information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

This data request does not diminish or excuse any pending written or oral data requests to you.

The Public Advocates Offices expects you to respond to this data request in a timely manner and with the highest level of candor.

**Responses:**

Restate the text of each request prior to providing the response. Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

**Requests for Clarification:**

If a request, definition, or an instruction, is unclear, notify the people listed above in writing within five (5) business days, including a specific description of what you find unclear and why, and a proposal for resolving the issue. In any event, unless directly otherwise by the people listed above, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

**Objections:**

If you object to any of portion of this Data Request, please submit specific objections, including the specific legal basis for the objection, to the people listed above within five (5) business days.

**Assertions of Privilege:**

If you assert any privilege for documents responsive to this data request, please provide within five (5) business days to the people list above a privilege log identifying each withheld document, and: (a) a summary description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the legal basis for withholding the document.

**Assertions of Confidentiality:**

If you assert confidentiality for any of the information provided, please identify the information that is confidential and provide a specific explanation of the basis for each such

assertion. Assertions of confidentiality will be carefully scrutinized and may not be upheld absent a strong showing of the need for confidentiality.

### **DEFINITIONS**

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCG,” and “SoCalGas” mean Southern California Gas Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1<sup>st</sup> of January and the 31<sup>st</sup> of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1<sup>st</sup>, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31<sup>st</sup>.
- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion,

assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

- I. The term “lobbying” shall be as defined on pages 3 and 4 of the Sempra Political Activities Policy.

### **DATA REQUEST**

1. In 2017, Los Angeles World Airports updated its Alternative Fuel Vehicle Requirement Program.<sup>1</sup> At any time, has SoCalGas lobbied the Los Angeles Board of Airport Commissioners regarding its Alternative Fuel Vehicle Requirement Program?<sup>2</sup>
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.
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.
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
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.
6. On October 18, 2017, a press conference was held in South Gate regarding the Advanced Clean Trucks Now Plan.<sup>3</sup>
  - 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.

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<sup>1</sup> “Los Angeles Board of Airport Commissioners Approve Updates to LAX Alternative Fuel Vehicle Requirement Program to Further Improve Airport Air Quality,” Los Angeles World Airports, October 5, 2017.

<sup>2</sup> The term “lobbying” and its derivatives shall be as defined on pages 3 and 4 of the Sempra Political Activities Policy.

<sup>3</sup> “Elected Officials, Health Organizations, Residents Unite in South Gate to Urge Cleaner Trucks Sooner in the Clean Air Action Plan,” Advanced Clean Trucks NOW, October 18, 2017.

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?
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?
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.
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.
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
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.
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.
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.
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.
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
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.
18. Provide all contracts since 2017 between SoCalGas and Imprenta Communications Group, Inc., Marathon Communications, Inc. (excluding Agreement: 5660052135), and Ek, Sunkin & Bai, LLC.
  - 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.
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.
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.
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
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.
23. Please provide any two distinct Work Order Authorizations signed by Sharon Tomkins between June 2, 2018 and March 20, 2019.
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.

**END OF REQUEST**