



Public Advocates Office
California Public Utilities Commission

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PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-SC-SCG-2019-02

Date: July 2, 2019

Response Requested: **Wednesday, July 17, 2019**

To: **Shirley Arazi** Phone:
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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. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal PA) contact(s) above with a copy to the Public Advocates Office attorney.

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 this date, notify the Public Advocates Office as soon as possible, 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.

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.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief 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 reason for withholding it.

If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCE,” 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 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- 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.

DATA REQUEST

1. Please provide all invoices from Marathon Communications for work done from January 26, 2018 to June 30, 2018 and for work done from May1, 2019 to present.
2. For all Marathon Communication Invoices received for work done from January 26, 2018 to present, please provide all Marathon submitted receipts, invoices from subcontractors, or other explanations of work done.
3. In attachment A, please complete the provided lists by summarizing the services provided by Marathon Communications for each invoice received for work done from January 26, 2018 to present.
4. In attachment B, please complete the provide table with the number of hours spent on tasks conducted for and/or on behalf of C4BES and provide the hourly rate at which

those hours were billed for each Marathon Communication invoice received for work done from January 26, 2018 to present.

5. Referencing Amendment No. 1 to the Standard Services Agreement No. 5660052135 (between SoCalGas and Marathon Communication), Schedule D-Scope of Work “For the date period of May 1, 2018 - December 31, 2018 Supplier shall work with the natural gas and renewable natural gas Company users (industry, agriculture, residential) to develop a broad-based nonprofit organization...”:
 - a. Does the “organization” stated in the agreement refer to “Californians for Balanced Energy Solutions (C4BES)”?
 - b. If “organization” does not refer to C4BES, please specify the name of the organization.
6. Referencing Amendment No. 1 to the Standard Services Agreement No. 5660052135 (between SoCalGas and Marathon Communication), does the scope of work under this agreement include work not done for, on behalf of, or in support of C4BES?
 - a. If yes, please specify what other work is encompassed under this agreement.
 - b. If yes, please specify the total amount of charges to ratepayers for work done under this agreement, clearly indicate how much of the charges to ratepayers are associated with work done for, on behalf of, or in support of C4BES; and how much of the charges are for other work outside work done for, on behalf of, or in support of C4BES. Please provide all supporting evidence and documentations.
7. Referencing Amendment No. 3 to the Standard Services Agreement No. 5660052135 (between SoCalGas and Marathon Communication) Schedule E1, does the “ramp-up” period refer to increased activity related to C4BES (such as the public launch or an increased recruiting effort)?
 - a. If yes, please indicate what portion of the retainer fee was used for work done for or on behalf of C4BES.
 - b. If no, please detail what the “ramp-up” period is referring to. Please include specific organization names or campaign name/goals.

END OF REQUEST