

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application For Rehearing Of Resolution
ALJ-391

A.20-12-011
(Filed: December 21, 2020)

**DECLARATION OF JASON H. WILSON IN SUPPORT OF SOUTHERN
CALIFORNIA GAS COMPANY'S OPPOSITION TO PUBLIC ADVOCATES
OFFICE MOTION FOR AN EXPEDITED RULING
(1) ORDERING SOUTHERN CALIFORNIA GAS COMPANY TO PRODUCE
CONFIDENTIAL DECLARATIONS NO LATER THAN JANUARY 6, 2021 AND FOR
AN EXTENSION TO RESPOND TO THE UTILITY'S APPLICATION FOR
REHEARING OR IN THE ALTERNATIVE TO GRANT AN ADVERSE
PRESUMPTION AGAINST THE UTILITY OR FOR THE COMMISSION TO
PROVIDE THE CONFIDENTIAL DECLARATIONS AND
(2) TO SHORTEN TIME TO RESPOND TO MOTION**

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Attorneys for:
SOUTHERN CALIFORNIA GAS
COMPANY

Dated: January 4, 2021

DECLARATION OF JASON H. WILSON IN SUPPORT OF SOUTHERN CALIFORNIA GAS COMPANY'S OPPOSITION TO PUBLIC ADVOCATES OFFICE MOTION FOR AN EXPEDITED RULING
(1) ORDERING SOUTHERN CALIFORNIA GAS COMPANY TO PRODUCE CONFIDENTIAL DECLARATIONS NO LATER THAN JANUARY 6, 2021 AND FOR AN EXTENSION TO RESPOND TO THE UTILITY'S APPLICATION FOR REHEARING OR IN THE ALTERNATIVE TO GRANT AN ADVERSE PRESUMPTION AGAINST THE UTILITY OR FOR THE COMMISSION TO PROVIDE THE CONFIDENTIAL DECLARATIONS AND
(2) TO SHORTEN TIME TO RESPOND TO MOTION

I, Jason H. Wilson, do declare as follows:

1. I am Jason H. Wilson, a partner in Willenken LLP, counsel of record for Southern California Gas Company ("SoCalGas") in the non-proceeding involving Cal Advocates' investigation of SoCalGas's lobbying activities. I am personally familiar with the facts and representations in this declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. Attached as Exhibit A hereto is a true and correct copy of Cal Advocates' Data Request No. CalAdvocates-SC-SCG-2020-03 sent on December 18, 2020 with a due date of December 28, 2020.

3. Attached as Exhibit B hereto is a true and correct copy of Cal Advocates' Data Request No. CalAdvocates-AW0SCG-2020-08 sent on December 31, 2020 with a due date of January 15, 2021.

4. Attached as Exhibit C hereto is a true and correct copy of Cal Advocates' Data Request No. CalAdvocates-AW0SCG-2020-08 sent on December 31, 2020 at 6:00 pm with a due date of January 6, 2021, as well as the transmittal for this data request sent by Ms. Traci Bone.

5. Attached as Exhibit D hereto is a true and correct copy of Cal Advocates' December 21, 2020 email asking for extension of time to respond to SoCalGas Application for Rehearing. There is no mention in the email of Cal Advocates attempting to meet and confer on its extension request. Cal Advocates never contacted me to meet and confer on their requested extension.

6. Attached as Exhibit E hereto is a true and correct copy of Cal Advocates' December 30, 2020 email which includes a motion that asks for extension of time to response to SoCalGas's Application for Rehearing. Cal Advocates never contacted me to meet and confer on their requested extension.

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

Executed this January 4, 2021, at Los Angeles, California.



Jason H. Wilson

EXHIBIT A



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-SC-SCG-2020-03
Not In A Proceeding

Date Issued: December 18, 2020

Date Due: December 28, 2021

To: Corinne Sierzant Phone: (213) 244-5354
Regulatory Affairs for SoCalGas Email: CSierzant@socalgas.com

Elliott S. Henry Phone: (213) 244-8234
Attorney for SoCalGas Email: EHenry@socalgas.com

Stacy Van Goor Email: SVanGoor@sempra.com
Sempra Energy

Jason H. Wilson Email: jwilson@willenken.com
Outside Counsel for SoCalGas Phone: 213.955.8020

From: Stephen Castello Phone: (415) 703-1063
Analyst for the Email: Stephen.Castello@cpuc.ca.gov
Public Advocates Office

Traci Bone Phone: (415) 713-3599
Attorney for the Email: Traci.Bone@cpuc.ca.gov
Public Advocates Office

Alec Ward Phone: (415) 703-2325
Analyst for the Email: Alec.Ward@cpuc.ca.gov
Public Advocates Office

INSTRUCTIONS¹

General:

You are instructed to answer the following Data Requests with written, verified responses pursuant to, without limitation, Public Utilities Code §§ 309.5(e), 311(a), 314, 314.5(a), 581, 582, 584, 701 and 702 and Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure within ten (10) business days. Note that Public Utilities Code § 581 requires you to provide the information in the form and detail that we request and failure to do so may result in fines or other penalties.

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:

Responses shall restate the text of each question prior to providing the response, identify the person providing the answer to each question and his/her contact information, identify all documents provided in response to the question, and clearly mark such documents with the data request and question number they are responsive to.

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.

¹ Because SoCalGas has routinely failed to comply with the Instructions provided in the data requests in this investigation, portions of these Instructions are highlighted to bring your attention to the Instructions. Cal Advocates' expects that you will comply with all of the Instructions, including those that are highlighted.

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 notify Cal Advocates of your intent to make such claims within five (5) business days, and provide a privilege log no later than the due date of this data request, including: (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 with highlights and provide a specific explanation of the basis for each such assertion. No confidential information should be blacked out. Assertions of confidentiality will be carefully scrutinized and are likely to be challenged absent a strong showing of the legal basis and need for confidentiality.

Signed Declaration:

The data response shall include a signed declaration from a responsible officer or an attorney under penalty of perjury that you have used all reasonable diligence in preparation of the data response, and that to the best of their knowledge, it is true and complete.

In addition, any claim of confidentiality or privilege shall be supported by a declaration from your attorney under penalty of perjury stating that your attorney is familiar with the relevant case law and statutes pertaining to claims of confidentiality and privilege such that there is a good faith basis for the claim.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCG,” and “SoCalGas” and 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, including its parent, Sempra Energy Company.
- 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.
- I. Terms related in any way to “lobbying,” lobbyist,” “lobbying firm” and “lobbyist employer” shall, without limitation, be construed broadly and, without limitation, to be inclusive of how those terms are described in the Sempra Energy Political Activities Policy (Policy) and the training materials related to the Policy.²

² The Sempra Energy Political Activities Policy defines lobbying broadly on page 3 as: “any action intended to influence legislative or administrative action, including activities to influence government officials, political parties, or ballot measures. Lobbyists can be individual employees or the company that employees them, referred to as a Lobbyist-Employer.”

DATA REQUEST

1. On page 3 of the December 18, 2020 application for rehearing of Resolution ALJ-391 SoCalGas states: Further, if Sierra Club through the Joint Prosecution Agreement has coopted or inappropriately taken advantage of Cal Advocates' statutory authority for its own benefit, it would be an abuse of Cal. Pub. Util. Code § 309.5.

Please provide any and all evidence in SoCalGas' possession or control of Cal Advocates' statutory authority being "inappropriately taken advantage of" by Sierra Club, as referenced above.

2. On page 19 of the December 18, 2020 application for rehearing of Resolution ALJ-391 SoCalGas states: Cal Advocates (and the Sierra Club, with whom Cal Advocates is apparently sharing information and investigational strategy under a Joint Prosecution Agreement)

Please provide any and all evidence in SoCalGas's possession or control showing that Cal Advocates' "sharing information and investigational strategy" with the Sierra Club.

3. On page 20 of the December 18, 2020 application for rehearing of Resolution ALJ-391 SoCalGas states: Cal Advocates has also apparently shared its investigatory power with Sierra Club under a Joint Prosecution Agreement specifically to investigate SoCalGas's "use of consumer funds for anti-electrification activities.

Please provide any and all evidence in SoCalGas's possession or control showing that Cal Advocates "shared its investigatory power with Sierra Club."

4. Please provide any and all evidence in SoCalGas' possession or control showing that Cal Advocates shared SoCalGas' confidential information with Sierra Club.

5. Please provide any and all evidence in SoCalGas' possession or control showing that Cal Advocates shared SoCalGas' confidential information related to the subject of the Application for Rehearing with any entity or party, other than SoCalGas.

EXHIBIT B



Public Advocates Office
California Public Utilities Commission

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San Francisco, CA 94102
Phone: (415) 703-2544
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<http://publicadvocates.cpuc.ca.gov>

PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-AW-SCG-2020-08

Not In A Proceeding

Date Issued: December 31, 2020

Date Due: January 15, 2021

To: **Brooke Holland**
Regulatory Affairs for SoCalGas

Phone: (615) 557-6172
Email: Aholland@socalgas.com

Jason H. Wilson
Outside Counsel for SoCalGas

Phone: (213) 955-8020
Email: Jwilson@willenken.com

From: **Traci Bone**
Attorney for the
Public Advocates Office

Phone: (415) 713-3599
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Alec Ward
Analyst for the
Public Advocates Office

Phone: (415) 703-2325
Email: Alec.Ward@cpuc.ca.gov

Stephen Castello
Analyst for the
Public Advocates Office

Phone: (415) 703-1063
Email: Stephen.Castello@cpuc.ca.gov

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In addition, any claim of confidentiality or privilege shall be supported by a declaration from your attorney under penalty of perjury stating that your attorney is familiar with the relevant case law and statutes pertaining to claims of confidentiality and privilege such that there is a good faith basis for the claim.

DEFINITIONS

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- 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.
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- 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. Terms related in any way to “lobbying,” lobbyist,” “lobbying firm” and “lobbyist employer,” and activities intended to influence legislative or administrative actions at the state or local government level, shall, without limitation, be construed broadly and, without limitation, to be inclusive of how those terms are described in the Sempra Energy Political Activities Policy (Policy), the training materials related to the Policy, and the California Political Reform Act .²

² The Sempra Energy Political Activities Policy defines lobbying broadly on page 3 as: “any action intended to influence legislative or administrative action, including activities to influence government officials, political parties, or ballot measures. Lobbyists can be individual employees or the company that employees them, referred to as a Lobbyist-Employer.” The California Political Reform Act has a similarly broad definition. See, e.g., Gov’t Code § 82032.

DATA REQUEST

1. Please identify in tabular format all 501(c)4 entities that SoCalGas has contributed to from 2015 to today. Please include columns identifying the name of the entity, the amounts contributed in each year to the entity, and the Federal Energy Regulatory Commission (FERC) account number where the contributions to the entity were booked.
2. Provide all bylaws for Californians for Balanced Energy Solutions (C4BES).
3. Provide documents identifying the officers of C4BES at the time of its formation, and documentary evidence establishing the date on which each such officer agreed to be an officer of C4BES.
4. Identify the total amount of all donations to C4BES in 2019.
 - a. How much was donated by SoCalGas and how much was donated by other investor-owned utilities (IOUs) or entities representing IOUs during this period?
5. Identify the total amount of all donations to C4BES in 2020.
 - a. How much was donated by SoCalGas, and how much was donated by other IOUs or entities representing IOUs during this period?
6. Has John Switalski been paid to act as the C4BES Executive Director?
 - a. If so, how much has he been paid for each year from 2018 to the present?
7. Please provide a screen shot of a SoCalGas employee's time entries that is consistent with SoCalGas' representations in response to Question 6 of CALADVOCATES-TB-SCG-2020-02 that "SoCalGas employees charge their bi-weekly expenses based upon the appropriate accounting information for the specific activity or activities being supported."
8. Please explain how this description of employee timekeeping is consistent with SoCalGas' representations in response to Question 24 of CALADVOCATES-AW-SCG-2020-01 that "Regional Public Affairs employees do not track their time by project or proceedings."
9. Please provide a screen shot of a Regional Public Affairs employee's time entries for the month of June 2019 that reflects the "specific activity or activities being supported."

10. In its June 28, 2020 response to Question 7 of DATA REQUEST CALADVOCATES-TB-SCG-2020-02, SoCalGas explained how costs are excluded from general rate cases. Among other things, it stated:

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.

- a. Please identify all employees whose “labor” was classified as “shareholder” for purposes of SoCalGas’ last GRC and all employees whose “labor” is currently classified as “shareholder” for purposes of SoCalGas’ next GRC.
 - i. To the extent that labor is allocated to both shareholders and ratepayers, please identify the percentage of allocation for each employee.
- b. General Order (GO) 77-M requires Sempra and its affiliates to identify “the proportion of compensation” for employees earning over \$125,000 “that is paid, directly or indirectly, by the utility’s ratepayers (e.g. 100% or some lesser percentage).” To the extent subsection (a) can be answered by reference to GO 77-M filings, please provide those filings and identify where this information is provided.
- c. Please identify with specificity where in SoCalGas’ 2019 GO 77-M filing the proportion of compensation allocated to ratepayers is identified.
- d. Are all employee benefits, such as pension and insurance, included in SoCalGas’ calculation of an employee’s “cost” for purposes of allocating employee costs to shareholders?
 - i. If so, please provide documentary evidence.

- ii. If not, please explain why these costs are not paid for with shareholder funds where employee work has not been to the benefit of ratepayers.
 - e. Please identify all internal orders – as that term is used in SoCalGas’ response quoted above - that were excluded from SoCalGas’ last GRC and those that SoCalGas has already identified for exclusion from its next GRC. If none exist, please state that.
 - f. Please identify all internal orders for activities that were “established and flagged for removal” from SoCalGas’ last GRC, and those anticipated to be flagged for removal from SoCalGas’ next GRC.
 - g. Please identify all cost centers, by number, that were excluded from SoCalGas’ last GRC and that will be excluded from its next GRC and the total costs booked to those cost centers on an annual basis from 2015 to the present.
11. SoCalGas spokesperson Chris Gilbride was quoted in a Politico article issued September 24, 2020, that SoCalGas has “established protocols to make sure lobbying costs are not paid by ratepayers.”³
- a. Please provide the most current version of the SoCalGas protocols Mr. Gilbride was referring to.
 - b. Please provide evidence that demonstrates that SoCalGas is complying with those protocols.
 - c. Please provide all prior versions of those protocols from 2015 to the present.
12. Question 1 of Data Request CALADVOCATES SC-SCG-2019-08 asks for costs associated with SoCalGas’s outreach to municipalities regarding passing balanced-energy resolutions. SoCalGas responded that “SoCalGas did not track the costs associated with communications between Regional Public Affairs employees and municipalities.”
- a. Why is SoCalGas unable to estimate the resources spent on these efforts – outreach to municipalities regarding passing balanced-energy resolutions - when it has been able to provide cost estimates associated with other outreach campaigns?
 - b. Please identify the roles of Steve Pangarliotas and Andy Carrasco in these efforts.
 - c. Please estimate the percentage of daily staff time Steve Pangarliotas and Andy Carrasco spent on the efforts.
 - d. Please provide all contracts or invoices associated with these efforts.

³ See: <https://www.politico.com/states/california/story/2020/09/24/how-socialgas-leveraged-mayors-and-minority-groups-to-score-a-fossil-fuel-win-1304131>.

13. Please identify each account to which any portion of the costs identified in response to question 12 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.

14. Please see the Forms 635 and 640 submitted to the Fair Political Practices Commission (FPPC) by Sempra Energy on behalf of SoCalGas between 2018 and the third quarter of 2020 which are available on the FPPC's website. Please:
 - a. Provide the accounting that identifies each expense that was included in the lump sum overhead expense disclosed on Line 1 of Form 640 for each quarter.
 - b. Explain why payments made in support of C4BES have never been identified on any of the forms submitted to the FPPC.
 - c. Explain whether Sempra or its affiliates have identified in FPPC filings any payments to Lobbying Coalitions as that term is defined in the Political Reform Act at Gov't Code § 82038.3 from 2015 to the present.
 - i. If so, please identify where, including confirming evidence.
 - ii. If not, please explain why not.
 - d. Identify the specific activities William Blattner engaged in that justified over \$16,000 in payments to him in 2020 to influence legislative or administrative action.
 - i. Was this compensation in addition to his salary?
 - ii. Why was it separately identified on Form 640 instead of being included in overhead expenses on Line 1?
 - e. Identify the specific activities Kent Kauss engaged in that justified the payments made to him in 2017 and 2018 to influence legislative or administrative action.
 - i. Was this compensation in addition to his salary?
 - ii. Why was it separately identified on Form 640 instead of being included in overhead expenses on Line 1, and where were these payments identified on Sempra Energy's 2019 GO 77-M form?
 - f. Why are the reported payments to Marathon Communications in 2019 less than the actual amounts paid to the company?
 - i. Why were payments to the company not reported on FPPC Form 645?
 - g. What activities did Marathon Communications perform in 2019 to earn the additional unreported monies paid to it?
 - h. Why are the reported payments to Imprenta Communications Group in 2018 less than the actual amounts paid to the company?
 - i. Why were payments to the company not reported on Form 645?

- i. What activities did Imprenta Communications Group perform in 2018 to earn the additional unreported monies paid to it?

END OF REQUEST

EXHIBIT C

Jason Wilson

From: Bone, Traci <traci.bone@cpuc.ca.gov>
Sent: Thursday, December 31, 2020 6:01 PM
To: Holland, Brooke; Ward, Alec
Cc: Castello, Stephen; Jason Wilson
Subject: RE: Data Request - CalAdvocates-AW-SCG-2020-09 - Due January 6, 2021
Attachments: Data Request - CalAdvocates-AW-SCG-2020-09.docx

Brooke:

Attached please find data request CalAdvocates-AW-SCG-2020-09 which does have a tight turn around date of January 6, 2021. However, given SoCalGas' close association with C4BES, we anticipate that the questions can be easily answered.

Happy New Year!

Traci Bone
Attorney for the Public Advocates Office at the
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Work: (415) 703-2048
Cell: (415) 713-3599
tbo@cpuc.ca.gov

From: Holland, Brooke <AHolland@socalgas.com>
Sent: Thursday, December 31, 2020 3:47 PM
To: Ward, Alec <Alec.Ward@cpuc.ca.gov>
Cc: Bone, Traci <traci.bone@cpuc.ca.gov>; Castello, Stephen <Stephen.Castello@cpuc.ca.gov>; Jason Wilson <jwilson@willenken.com>
Subject: Re: Data Request - CalAdvocates-AW-SCG-2020-08 - DUE 1/15

Received and thank you, Alec! Hope you are enjoying the holiday as well.

From: Ward, Alec <Alec.Ward@cpuc.ca.gov>
Sent: Thursday, December 31, 2020 1:16:33 PM
To: Holland, Brooke <AHolland@socalgas.com>
Cc: Bone, Traci <traci.bone@cpuc.ca.gov>; Castello, Stephen <Stephen.Castello@cpuc.ca.gov>; Jason Wilson <jwilson@willenken.com>
Subject: [EXTERNAL] Data Request - CalAdvocates-AW-SCG-2020-08 - DUE 1/15

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

Hi Brooke,

Please find the attached data request CalAdvocates-AW-SCG-2020-08. As we do not expect you all to work New Year's Day, responses are requested by **January 15, 2020**. Please reach out by phone or email if you have any questions and enjoy the holiday.

Thank you,
Alec

Alec Ward | Senior Analyst | Electricity Pricing and Customer Programs | Public Advocates Office | California Public Utilities Commission | 415-703-2325

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



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2544
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

**PUBLIC ADVOCATES OFFICE DATA REQUEST No. CalAdvocates-AW-SCG-
2020-08**

Not In A Proceeding

Date Issued: December 31, 2020

Date Due: January 6, 2021

To: **Brooke Holland** Phone: (615) 557-6172
Regulatory Affairs for SoCalGas Email: Aholland@socalgas.com

Jason H. Wilson Phone: (213) 955-8020
Outside Counsel for SoCalGas Email: Jwilson@willenken.com

From: **Traci Bone** Phone: (415) 713-3599
Attorney for the Email: Traci.Bone@cpuc.ca.gov
Public Advocates Office

Alec Ward Phone: (415) 703-2325
Analyst for the Email: Alec.Ward@cpuc.ca.gov
Public Advocates Office

Stephen Castello Phone: (415) 703-1063
Analyst for the Email: Stephen.Castello@cpuc.ca.gov
Public Advocates Office

INSTRUCTIONS¹

General:

You are instructed to answer the following Data Requests with written, verified responses pursuant to, without limitation, Public Utilities Code §§ 309.5(e), 311(a), 314, 314.5(a), 581, 582, 584, 701 and 702 and Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure within ten (10) business days. Note that Public Utilities Code § 581 requires you to provide the information in the form and detail that we request and failure to do so may result in fines or other penalties.

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:

Responses shall restate the text of each question prior to providing the response, identify the person providing the answer to each question and his/her contact information, identify all documents provided in response to the question, and clearly mark such documents with the data request and question number they are responsive to.

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

¹ Because SoCalGas has routinely failed to comply with the Instructions provided in the data requests in this investigation, portions of these Instructions are highlighted to bring your attention to the Instructions. Cal Advocates' expects that you will comply with all of the Instructions, including those that are highlighted.

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.

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 notify Cal Advocates of your intent to make such claims within five (5) business days, and provide a privilege log no later than the due date of this data request, including: (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 with highlights and provide a specific explanation of the basis for each such assertion. No confidential information should be blacked out. Assertions of confidentiality will be carefully scrutinized and are likely to be challenged absent a strong showing of the legal basis and need for confidentiality.

Signed Declaration:

The data response shall include a signed declaration from a responsible officer or an attorney under penalty of perjury that you have used all reasonable diligence in preparation of the data response, and that to the best of their knowledge, it is true and complete.

In addition, any claim of confidentiality or privilege shall be supported by a declaration from your attorney under penalty of perjury stating that your attorney is

familiar with the relevant case law and statutes pertaining to claims of confidentiality and privilege such that there is a good faith basis for the claim.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCG,” and “SoCalGas” and 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, including its parent, Sempra Energy Company.
- 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.
- I. Terms related in any way to “lobbying,” lobbyist,” “lobbying firm” and “lobbyist employer,” and activities intended to influence legislative or administrative actions at the state or local government level, shall, without limitation, be construed broadly and, without limitation, to be inclusive of how those terms are described in the Sempra Energy Political Activities Policy (Policy), the training materials related to the Policy, and the California Political Reform Act .²

DATA REQUEST

The following questions are prompted by the article issued today and available at <https://www.independent.com/2020/12/31/its-time-for-santa-barbara-to-ditch-fossil-gas/>

1. Please provide a copy of the text message sent by Californians for Balanced Energy Solutions (C4BES) to Santa Barbara residents.
2. Please explain how Santa Barbara residents’ phone numbers were obtained to send the C4BES text message.
3. Please identify when the message or messages were sent and how many people they were sent to.
4. Please identify all other cities where similar text messages have been sent to residents of those communities.
5. Did Sempra Energy, SoCalGas, or SDG&E facilitate the delivery of the text messages in any manner, whether direct or indirect?

Pursuant to the instructions above, and consistent with Public Utilities Code § 581, please provide a signed declaration from a responsible officer or an attorney under penalty of perjury that you have used all reasonable diligence in preparation of the data response, and that to the best of their knowledge, it is true and complete.

² The Sempra Energy Political Activities Policy defines lobbying broadly on page 3 as: “any action intended to influence legislative or administrative action, including activities to influence government officials, political parties, or ballot measures. Lobbyists can be individual employees or the company that employees them, referred to as a Lobbyist-Employer.” The California Political Reform Act has a similarly broad definition. See, e.g., Gov’t Code § 82032.

Note that Public Utilities Code § 581 requires you to provide the information in the form and detail that we request and failure to do so may result in fines or other penalties.

END OF REQUEST

EXHIBIT D

Jason Wilson

From: Bone, Traci <traci.bone@cpuc.ca.gov>
Sent: Monday, December 21, 2020 10:11 AM
To: DeAngelis, Regina; Ghaffarian, Pouneh; Campbell, Michael; Farrar, Darwin; Serizawa, Linda; Simon, Anne; Castello, Stephen; shannon.orourke@cpuc.ca.gov; Batjer, Marybel; Ward, Alec; jqtran@socalgas.com; Sleiman, Mariam (Intern); Buckley, Theresa; Jason Wilson; rbarker@earthjustice.org; ltrujillo@socalgas.com; itom@willenken.com; scsierzant@socalgas.com; Aguilar, Arocles; tcarman@socalgas.com; mhovsepien@socalgas.com; ehenry@socalgas.com; bprusne@socalgas.com; Matthew Vespa (mvespa@earthjustice.org); Chupkov, Maya; Gallegos, Rachel
Cc: Bone, Traci
Subject: Extension Request For Responses to SoCalGas' Rehearing Application of Resolution ALJ-391

President Batjer, General Counsel Aguilar, Chief ALJ Simon, and ALJ DeAngelis:

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully requests an extension of time to file a Response to *Southern California Gas Company's Application For Rehearing of Resolution ALJ-391 and Request for Oral Argument* (Application). The 50 page Application was filed on Friday, December 18, 2020, the day after the Commission meeting approving Resolution ALJ-391. The Application is not due until 30 days after the effective date of Resolution ALJ-391, which is approximately January 20, 2021 – assuming the Resolution is issued today.

Cal Advocates' Response will promote prompt resolution of SoCalGas' Application because it will, among other things, provide supplemental legal analysis addressing SoCalGas' procedural due process and First Amendment rights.

Under Rule 16 of the Commission's Rules of Practice and Procedures (Rules), if no other rehearing requests are filed, Cal Advocates' Response would currently be due on January 4, 2021, requiring Cal Advocates staff to work through both the Christmas and New Year holidays. Cal Advocates proposes that its Response be due no later than January 20, 2020 so that staff may spend the remaining days of this difficult year with family.

Traci Bone
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Cell: (415) 713-3599
tbo@cpuc.ca.gov

EXHIBIT E

Jason Wilson

From: Bone, Traci <traci.bone@cpuc.ca.gov>
Sent: Wednesday, December 30, 2020 1:30 PM
To: Tariffs; Peterson, Rachel A.
Cc: Aguilar, Arocles; ALJ Extension Requests; Holland, Brooke; AppRhg; Tran, Johnny Q; Jason Wilson; Trujillo, Leslie A; Carman, Teresa A; Tom@willenken.com; abb@eslawfirm.com; Ward, Alec; Korpics, Brian; Farrar, Darwin; Lisa Gibbons; Serizawa, Linda; Hovsepian, Melissa A; Campbell, Michael; Chupkov, Maya; Ghaffarian, Pouneh; DeAngelis, Regina; Castello, Stephen; Lyser, Shelly; O'Rourke, Shannon; Sidhar, Shivani N; Sherin Varghese; Buckley, Theresa
Subject: RE: Request of Southern California Gas Company for an Extension of Time to Comply with Resolution ALJ-391
Attachments: A2012011 Public Advocates Office Motion for Commission to Produce Confidential Declarations - 12-30-20.pdf

As mentioned below, Cal Advocates just filed and served the attached short motion and attachments, which is relevant to SoCalGas' requested extension of time made earlier today.

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505 Van Ness Avenue
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Work: (415) 703-2048
Cell: (415) 713-3599
tbo@cpuc.ca.gov

From: Bone, Traci
Sent: Wednesday, December 30, 2020 12:08 PM
To: Tariffs <Tariffs@Socalgas.com>; Peterson, Rachel A. <rachel.peterson@cpuc.ca.gov>
Cc: Aguilar, Arocles <Arocles.Aguilar@cpuc.ca.gov>; ALJ Extension Requests <aljextensionrequests@cpuc.ca.gov>; Holland, Brooke <AHolland@socalgas.com>; AppRhg <AppRhg@cpuc.ca.gov>; Tran, Johnny Q <JQTran@socalgas.com>; JWilson@Willenken.com; Trujillo, Leslie A <LTrujillo@socalgas.com>; Carman, Teresa A <TCarman@socalgas.com>; Tom@willenken.com; abb@eslawfirm.com; Ward, Alec <Alec.Ward@cpuc.ca.gov>; Korpics, Brian <Brian.Korpics@cpuc.ca.gov>; Farrar, Darwin <darwin.farrar@cpuc.ca.gov>; Lisa Gibbons <lgibbons@willenken.com>; Serizawa, Linda <linda.serizawa@cpuc.ca.gov>; Hovsepian, Melissa A <MHovsepian@socalgas.com>; Campbell, Michael <Michael.Campbell@cpuc.ca.gov>; Chupkov, Maya <Maya.Chupkov@cpuc.ca.gov>; Ghaffarian, Pouneh <pouneh.ghaffarian@cpuc.ca.gov>; DeAngelis, Regina <regina.deangelis@cpuc.ca.gov>; Castello, Stephen <Stephen.Castello@cpuc.ca.gov>; Lyser, Shelly <Shelly.Lyser@cpuc.ca.gov>; O'Rourke, Shannon <Shannon.O'Rourke@cpuc.ca.gov>; Sidhar, Shivani N <SSidhar1@semprautilities.com>; Sherin Varghese <svarghese@willenken.com>; Buckley, Theresa <Theresa.Buckley@cpuc.ca.gov>
Subject: RE: Request of Southern California Gas Company for an Extension of Time to Comply with Resolution ALJ-391

The Public Advocates Office at the California Public Utilities Commission objects to the requested extension, as set forth in the attached Response to SoCalGas' December 22, 2020 stay request.

In addition, it has become evident that certain information SoCalGas has refused to provide to Cal Advocates is necessary to the Commission's review of the utility's Rehearing Application in this matter. These issues will be addressed by Cal Advocates in a motion filed later today.

Traci Bone
Attorney for the Public Advocates Office at the
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Work: (415) 703-2048
Cell: (415) 713-3599
tbo@cpuc.ca.gov

From: Tariffs <Tariffs@Socalgas.com>
Sent: Wednesday, December 30, 2020 10:57 AM
To: Peterson, Rachel A. <rachel.peterson@cpuc.ca.gov>
Cc: Aguilar, Arocles <Arocles.Aguilar@cpuc.ca.gov>; ALJ Extension Requests <aljextensionrequests@cpuc.ca.gov>; Holland, Brooke <AHolland@socalgas.com>; AppRhg <AppRhg@cpuc.ca.gov>; Tran, Johnny Q <JQTran@socalgas.com>; JWilson@Willenken.com; Trujillo, Leslie A <LTrujillo@socalgas.com>; Carman, Teresa A <TCarman@socalgas.com>; Tom@willenken.com; abb@eslawfirm.com; Ward, Alec <Alec.Ward@cpuc.ca.gov>; Korpics, Brian <Brian.Korpics@cpuc.ca.gov>; Farrar, Darwin <darwin.farrar@cpuc.ca.gov>; Lisa Gibbons <lgibbons@willenken.com>; Serizawa, Linda <linda.serizawa@cpuc.ca.gov>; Hovsepian, Melissa A <MHovsepian@socalgas.com>; Campbell, Michael <Michael.Campbell@cpuc.ca.gov>; Chupkov, Maya <Maya.Chupkov@cpuc.ca.gov>; Ghaffarian, Pouneh <pouneh.ghaffarian@cpuc.ca.gov>; DeAngelis, Regina <regina.deangelis@cpuc.ca.gov>; Castello, Stephen <Stephen.Castello@cpuc.ca.gov>; Lyser, Shelly <Shelly.Lyser@cpuc.ca.gov>; O'Rourke, Shannon <Shannon.O'Rourke@cpuc.ca.gov>; Sidhar, Shivani N <SSidhar1@semprautilities.com>; Sherin Varghese <svarghese@willenken.com>; Bone, Traci <traci.bone@cpuc.ca.gov>; Buckley, Theresa <Theresa.Buckley@cpuc.ca.gov>
Subject: Request of Southern California Gas Company for an Extension of Time to Comply with Resolution ALJ-391

Southern California Gas Company requests an Extension of Time to Comply with Resolution ALJ-391. Pursuant to Rule 16.6 of the Rules of Practice and Procedure of the California Public Utilities Commission, a Certificate of Service is also included.

Respectfully,

Southern California Gas Co.
Regulatory Affairs – Tariffs
Tariffs@SoCalGas.com

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application For Rehearing of Resolution
ALJ-391.

Application 20-12-011

**PUBLIC ADVOCATES OFFICE MOTION FOR AN EXPEDITED RULING
(1) ORDERING SOUTHERN CALIFORNIA GAS COMPANY TO PRODUCE
CONFIDENTIAL DECLARATIONS NO LATER THAN JANUARY 6, 2021 AND FOR
AN EXTENSION TO RESPOND TO THE UTILITY'S APPLICATION FOR
REHEARING OR IN THE ALTERNATIVE TO GRANT AN ADVERSE
PRESUMPTION AGAINST THE UTILITY OR FOR THE COMMISSION TO
PROVIDE THE CONFIDENTIAL DECLARATIONS AND
(2) TO SHORTEN TIME TO RESPOND TO MOTION**

I. REQUEST

Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this motion requesting an order requiring Southern California Gas Company (SoCalGas) to produce to Cal Advocates by no later than January 6, 2020, the confidential versions of Declarations 4, 5, and 6 (confidential declarations) that were attached to the utility's December 2, 2019 Motion for Reconsideration/Appeal of the November 1, 2019 Administrative Law Judge ruling.¹ Cal Advocates also requests an additional two business days' extension to file its Response to SoCalGas' Rehearing Application in this docket (Response), from January 11, 2021 to January 13, 2021 so that it may incorporate any findings from the confidential declarations into its Response. To the extent production of the confidential declarations is delayed beyond January 6, 2021, Cal Advocates requests an extension to file its Response five business days after production of the confidential declarations.

Alternatively, in lieu of ordering SoCalGas to provide the confidential declarations to Cal Advocates, Cal Advocates requests that the Commission either impose an adverse inference on

¹ Those declarations are part of SoCalGas' showing that it would be damaged by disclosure of certain discovery to Cal Advocates. The declarants claim that making their identities public would dissuade them from communicating or contracting with SoCalGas.

SoCalGas' claims that the confidential declarations are actually confidential, or provide the confidential declarations in the Commission's possession to Cal Advocates.

Lastly, Cal Advocates requests that this motion be treated in an expedited manner and that the Commission shorten parties' response time to January 4, 2021.

II. DISCUSSION

It has recently come to Cal Advocates' attention that it cannot prepare its Response to SoCalGas' Rehearing Application in this docket (Response) without access to the confidential declarations that SoCalGas has offered in support of its First Amendment association claims. This is because it is possible that the declarants' or their employers' identities may not, in fact, be confidential.

This fact is relevant because a showing that the declarants' or their employers' identities are already public would be dispositive to any SoCalGas First Amendment claim. This is because SoCalGas' First Amendment rights cannot be infringed by requiring it to disclose information that is already publicly available. Such a dispositive resolution of SoCalGas' First Amendment claims would significantly limit the Commission's need to address SoCalGas' rehearing arguments, and reduce the likelihood of any SoCalGas appeal to the courts.

This week, Cal Advocates learned that the identities of certain consultants that SoCalGas has variously claimed are confidential – including, without limitation, Marathon Communications (Marathon) and Imprenta Communications Group (Imprenta) – have been publicly available since before the declarations were signed. Indeed, the identities of these consultants, and many others, were provided in forms filed with the Fair Political Practices Commission (FPPC) in 2018 and 2019, and are publicly available on the FPPC's website.² Notwithstanding these public disclosures, SoCalGas claimed the Marathon and Imprenta consultants' identities were confidential long after the FPPC filings were made, and it is possible that the declarant's identities – which SoCalGas also claims are confidential – are similarly publicly available. However, this cannot be established without access to the confidential versions of the declarations.

² See Attachment A - Sempra Energy and Affiliates Period 4/1/2019-6/30/2019 Forms 635 and 640 listing Marathon Communications at 8-9, and Attachment B - Sempra Energy and Affiliates Period 1/1/2018-3/31/2018 Forms 635 and 640 listing Imprenta Communications Group at 9.

Only by reviewing the confidential declarations – or at least knowing the names of the declarants and the entities they work for – can Cal Advocates determine whether those declarant’s identities have also been made public – like those of Marathon and Imprint³ - thereby rendering moot SoCalGas’ reliance on those declarations to assert a First Amendment right of association.

It would be more than appropriate for the Commission to order SoCalGas to provide the confidential declarations to Cal Advocates within even twenty four hours. They are readily available to the utility and are over a year late. SoCalGas should have provided them to Cal Advocates when the utility served its December 2, 2019 Motion for Reconsideration/Appeal. SoCalGas provided the confidential declarations to the Commission and assigned Administrative Law Judge at that time, but intentionally and improperly withheld them from Cal Advocates based on claims that the consultant’s names were protected by the First Amendment right to association and unsubstantiated fears that Cal Advocates would publicly disclose the names of the consultants. The utility has refused to provide the confidential declarations to Cal Advocates for the past year, despite Cal Advocates’ repeated efforts to obtain them, including a July 9, 2020 Motion to Compel, which was finally acted on this month by Resolution ALJ-391.

Resolution ALJ-391 agreed that Cal Advocates is entitled to the confidential declarations,⁴ and requires SoCalGas to provide them to Cal Advocates no later than 30 days after the effective date of that Resolution – which would be January 20.⁵ However, for the reasons described above, it is now evident that the confidential declarations should be provided to Cal Advocates as soon as possible so that it may address their impact in its Response.

III. CONCLUSION

In order to facilitate review of SoCalGas’ Rehearing Application, the Commission should order SoCalGas to provide the confidential declarations to Cal Advocates as soon as practicable

³ Note that it is even possible that that some of the declarants may actually be employees of Marathon or Imprinta.

⁴ Resolution ALJ-391 finds: “[T]his Resolution grants SoCalGas’ December 2, 2019 motion for leave to file under seal confidential versions of certain declarations but, in doing so, confirms that SoCalGas must provide access to the unredacted versions of the confidential declarations to the Commission, including its staff, such as Cal Advocates, under existing protections. See also Ordering Paragraph 2.

⁵ SoCalGas filed a motion on December 22, 2020 to indefinitely stay its obligation to provide the declarations and other information to Cal Advocates.

and in no event later than January 6, 2021. Because the January 6, 2021 time frame proposed here provides Cal Advocates only three business days to incorporate any findings into its Response – which is currently due Monday, January 11, 2021 - Cal Advocates also requests a two-business day extension to file its Response on January 13, 2021.

As an alternative to providing the confidential declarations to Cal Advocates, the Commission should find that SoCalGas’ refusal to provide the information to Cal Advocates for over a year is grounds for a finding of adverse inference under the law. In such a situation, a court finds that if the information were produced, it would be adverse to the defendant. Applied here, the adverse inference would be that the confidential declarations are not, in fact confidential, because the identity of the declarants or their employers is, or is required to be,⁶ publicly available.

To the extent neither of these proposals are acceptable, Cal Advocates notes that the Commission and its staff are in possession of the confidential declarations, and could make them available to Cal Advocates at their discretion.

Finally, given Cal Advocates need for the information as soon as practicable, it requests expedited treatment of this motion and a shortened response date of January 4, 2021.

Respectfully submitted,

/s/ TRACI BONE

Traci Bone
Attorney for

The Public Advocates Office
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Telephone: (415) 703-2048
Email: Traci.Bone@cpuc.ca.gov

December 30, 2020

⁶ It is possible that SoCalGas is withholding information it is obligated to disclose in FPPC filings by mischaracterizing its consultants’ activities so that information that is required to be made public, has not, in fact, been made public.

ATTACHMENT A

Sempra Energy and Affiliates Period 4/1/2019-6/30/2019

FPPC Forms 635 and 640

REPORT OF LOBBYIST EMPLOYER

(Government Code Section 86116)

1/10

or

REPORT OF LOBBYING COALITION

(2 Cal. Code of Regs. Section 18616.4)

**FORM 635
1993**

IMPORTANT: Lobbying Coalitions must attach a completed Form 635-C to this Report.

REPORT COVERS PERIOD FROM 04/01/2019 THROUGH 06/30/2019

CUMULATIVE PERIOD BEGINNING 01/01/2019

FOR OFFICIAL USE ONLY

A

B

TYPE OR PRINT IN INK

For information required to be provided to you pursuant to the Information Practices Act of 1977, see Information Manual on Lobbying Disclosure Provisions of the Political Reform Act.

NAME OF FILER:

Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(Zip Code)

TELEPHONE NUMBER:

San Diego

CA

92101

PART I - LEGISLATIVE OR STATE AGENCY ADMINISTRATIVE ACTIONS ACTIVELY LOBBIED DURING THE PERIOD

(See instructions on reverse.)

See attached TEXT

If more space is needed, check box and attach continuation sheets.

SUMMARY OF PAYMENTS THIS PERIOD

A. Total Payments to In-House Employee Lobbyists (Part III, Section A, Column 1)	\$	<u>100414.23</u>
B. Total Payments to Lobbying Firms (Part III, Section B, Column 4)	\$	<u>267875.00</u>
C. Total Activity Expenses (Part III, Section C)	\$	<u>6946.66</u>
D. Total Other Payments to Influence (Part III, Section D)	\$	<u>163290.33</u>

GRAND TOTAL (A + B + C + D above) \$ 538526.22

E. Total Payments in Connection with PUC Activities (Part III, Section E) \$ 23430.06

F. Campaign Contributions: Part IV completed and attached No campaign contributions made this period

VERIFICATION

I have used all reasonable diligence in preparing this Report. I have reviewed the Report and to the best of my knowledge the information contained herein and in the attached schedules is true and complete.

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

Executed on (Date)
07/31/2019

At (City and State)
San Diego, CA

By (Signature of Employer or Responsible Officer)
Mr. Dennis Arriola

Name of Employer or Responsible Officer (Type or Print)
Mr. Dennis Arriola

Title
EVP and Group President

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART II - PARTNERS, OWNERS, AND EMPLOYEES WHOSE "LOBBYIST REPORTS" (FORM 615) ARE ATTACHED TO THIS REPORT (See instructions on reverse.)

Name and Title	Name and Title
Employee Israel Salas Government Affairs Manager	Employee Ms. Nicolina Hernandez Government Affairs Manager
Employee Ms. Lourdes Jimenez Government Affairs Manager	

If more space is needed, check box and attach continuation sheets.

PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

A. PAYMENTS TO IN-HOUSE EMPLOYEE LOBBYISTS (See instructions on reverse. Also enter the Amount This Period (Column 1) on Line A of the Summary of Payments section on page 1.)	(1) Amount This Period	(2) Cumulative Total To Date
		\$ 100414.23

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)					
Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
AJW, Inc. Arlington VA 22201	0.00	0.00	0.00	0.00	10000.00
California Strategies & Advocacy LLC Sacramento CA 95814	30000.00	0.00	0.00	30000.00	30000.00
Campbell Strategy & Advocacy, LLC Sacramento CA 95814	18000.00	0.00	0.00	18000.00	47000.00
CAPITOL STRATEGIES GROUP, INC. Sacramento CA 95814	69000.00	0.00	0.00	69000.00	81000.00
CRUZ STRATEGIES SACRAMENTO CA 95814	44000.00	0.00	0.00	44000.00	69453.84

TOTAL THIS PERIOD (Column 4)

Also enter the total of Column 4 on Line B of the Summary of Payments section on page 1.

\$ 267875.00

If more space is needed, check box and attach continuation sheets

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)				
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each	Description of Consideration	Total Amount of Activity
05/06/2019	Amourath Sacramento CA 98514	Patsy Ayala Field Rep - Senator Wilk	VISA 11.20 Meal	\$ 34.80
04/30/2019	Eurest Dining San Diego CA 92123	Janea Scott CEC Commissioner	10.00 MASTER - CARD Meal	106.30
05/09/2019	Eurest Dining San Diego CA 92123	Tony Mecham CAL Fire Unit Chief	14.95 Other Meal	1495.00
05/22/2019	Eurest Dining Los Angeles CA 90013	Lana Wong CEC Senior Analyst	25.09 Other Meal	150.56
	Eurest Dining Los Angeles CA 90013	Rod Walker CEC Consultant	25.09 Other Meal	
<input checked="" type="checkbox"/> If more space is needed, check box and attach continuation sheets.			TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.	\$ 6946.66
D. OTHER PAYMENTS TO INFLUENCE LEGISLATIVE OR ADMINISTRATIVE ACTION <input checked="" type="checkbox"/> NOTE: State and local government agencies do not complete this section. Check box and complete Attachment Form 640 instead.				
1. PAYMENTS TO LOBBYING COALITIONS (NOTE: You must attach a completed Form 630 to this Report.)			\$ 0.00	
2. OTHER PAYMENTS			\$ 163290.33	
			TOTAL SECTION D (1 + 2) Also enter the total of Section D on Line D of the Summary of Payments section on page 1.	\$ 163290.33
E. PAYMENTS IN CONNECTION WITH ADMINISTRATIVE TESTIMONY IN RATEMAKING PROCEEDINGS BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION Also, enter the total of Section E on Line E of the Summary of Payments section on page 1. (See instructions on reverse.)				\$ 23430.06

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)

Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
Mercury Public Affairs Sacramento CA 95814	46875.00	0.00	0.00	46875.00	67875.00
Kester/Pahos Sacramento CA 95814	60000.00	0.00	0.00	60000.00	60000.00

TOTAL THIS PERIOD (Column 4)
Also enter the total of Column 4 on Line B of the Summary of Payments section on page 1.

\$ 267875.00

PERIOD COVERED: 04/01/2019 06/30/2019NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)				
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each	Description of Consideration	Total Amount of Activity
	Eurest Dining Los Angeles CA 90013 Reference No:	Elexeious Prigett CEC Oil & Gas Advisor	\$ 25.09 Other	Meal \$
06/25/2019	Sutter Club Sacramento CA 95814 Reference No:	Miranda Flores Legislative Director - Assemb - lymember Quirk	\$ 67.01 MASTER - CARD	Meal \$ 5160.00
	Sutter Club Sacramento CA 95814 Reference No:	Tim Olson Senior Policy Advisor - CEC	\$ 67.01 MASTER - CARD	Meal \$
	Sutter Club Sacramento CA 95814 Reference No:	Kielan Rathjan Executive Fellow - Governor's office of Business	\$ 67.01 MASTER - CARD	Meal \$
	Sutter Club Sacramento CA 95814 Reference No:	Prab Sethi Grant Manager - CEC	\$ 67.01 MASTER - CARD	Meal \$
	Sutter Club Sacramento CA 95814 Reference No:	Dan Sperling Board Member - CARB	\$ 67.01 MASTER - CARD	Meal \$
	Sutter Club Sacramento CA 95814 Reference No:	Bill Quirk Assemblymember	\$ 67.01 MASTER - CARD	Meal \$
	Sutter Club Sacramento CA 95814 Reference No:	Tyson Eckerle Deputy Director - Governor's office of Business	\$ 67.01 MASTER - CARD	Meal \$
TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.				\$

PERIOD COVERED: 04/01/2019 06/30/2019NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)					
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each		Description of Consideration	Total Amount of Activity
	Sutter Club Sacramento CA 95814 Reference No:	Hassan Mohammed Contract Manager - CEC	\$ 67.01 MASTER - CARD	Meal	\$
TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.					\$ 6946.66

Attachment Form 640

(Attachment to Form 635 or Form 645)

CALIFORNIA
1993 FORM

640

8/10

PERIOD COVERED: 04/01/2019--06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

For Use By: A state or local government agency that qualifies as a lobbyist employer or a \$5,000 filer. Refer to the instructions on the cover page before completing this attachment.

Other Payments to Influence Legislative or Administrative Action:

1. Total payments for overhead expenses related to lobbying activity. <u>Report as a lump sum.</u>	\$ 7937.99
2. Total payments to Lobbying Coalitions. <u>Report as a lump sum.</u>	\$ 0.00
(Form 630 must be attached)	
3. Total payments of less than \$250 during the calendar quarter for lobbying activity (excluding overhead). <u>Report as a lump sum.</u>	\$ 2053.10
4. Total payments of more than \$250 during the calendar quarter for lobbying activity (excluding overhead). Such payments must be itemized below.	\$ 153299.24
5. Grand total of "Other Payments to Influence Legislative or Administrative Action." Also enter this total on the appropriate line of the Summary of Payments section on Page 1 of Form 635 or Form 645.	<u>\$ 163290.33</u>

Itemize below payments of \$250 or more made during the quarter for lobbying activity. Provide the name and address of the payee, the amount paid during the quarter, and the cumulative amount paid to the payee since January 1 of the biennial legislative session covered by the report.

Also itemize dues or similar payments of \$250 or more made to an organization that makes expenditures equal to 10% of its total expenditures or \$15,000 or more in a calendar quarter to influence legislative or administrative action. Provide the organization's name and address, the amount paid to the organization during the quarter, and the cumulative amount paid to the organization since January 1 of the biennial legislative session covered by the report.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1
[E] - Sempra Expenses Related to Lobbying Activities San Diego CA 92101	\$ 32597.00	\$ 77593.00
[S] - Loren Logan San Diego CA 92123	\$ 5736.36	\$ 9833.76
[S] - Rhiannon Davis San Diego CA 92123	\$ 6286.57	\$ 10434.41
Subtotal of all payments itemized above	\$ 44619.93	

If more space is needed, check box and attach continuation sheets.

Attachment Form 640

(Continuation Sheet)



PERIOD COVERED: 04/01/2019--06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1 Biennial Legislative Session
[S] - Christopher Gilbride Los Angeles CA 90013	10825.32	21650.64
[P] - Bicker Castillo & Fairbanks Sacramento CA 95814	41343.59	41343.59
[S] - Kent Kauss Sacramento CA 95814	4709.73	7764.69
[P] - Storefront Political Media San Francisco CA 94111	28000.00	28000.00
[P] - Marathon Communications Los Angeles CA 90036	15266.75	15266.75
[S] - Scott Drury San Diego 92123	8533.92	8533.92
Subtotal of all payments itemized above	\$ 108679.31	

TEXT ANNOTATION

PAGE 1

Schedule F635

Reference No:

Assembly Bills: 25,38,56,74,111,126,157,161,178,235,281,291,491,560,660,684,745,753,784,868,900,915,961,983,1026,1039,1054,1057 - 1083,1100,1124,1143,1144,1156,1166,1195,1232,1293,1323,1328,1347,1362,1363,1371,1406,1424,1463,1516,1584,1690,1693,1751,1789,1799. Senate Bills: 44,49,70,85,130,155,167,169,182,190,199,209,210,216,247,255,290,350,457,463,515,520,524,535,548,549,550,551,561,584,597,632,660,662,676,682,766,772,774. Offices Lobbied: Governor's office, California Legislature, CARB, California Department of Forestry & Fire Protection, CalEPA, CEC, CISO, CPUC, California Resources Agency, California State Water Board.

Attachment B

Sempra Energy and Affiliates Period 1/1/208-3/31/2018

FPPC Forms 635 and 640

REPORT OF LOBBYIST EMPLOYER

(Government Code Section 86116)

1/10

or

REPORT OF LOBBYING COALITION

(2 Cal. Code of Regs. Section 18616.4)

FORM 635
1993

IMPORTANT: Lobbying Coalitions must attach a completed Form 635-C to this Report.

REPORT COVERS PERIOD FROM 01/01/2018 THROUGH 03/31/2018

CUMULATIVE PERIOD BEGINNING 01/01/2017

FOR OFFICIAL USE ONLY

A

B

TYPE OR PRINT IN INK

For information required to be provided to you pursuant to the Information Practices Act of 1977, see Information Manual on Lobbying Disclosure Provisions of the Political Reform Act.

NAME OF FILER:

Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(Zip Code)

TELEPHONE NUMBER:

San Diego

CA

92101

PART I - LEGISLATIVE OR STATE AGENCY ADMINISTRATIVE ACTIONS ACTIVELY LOBBIED DURING THE PERIOD

(See instructions on reverse.)

See attached TEXT

If more space is needed, check box and attach continuation sheets.

SUMMARY OF PAYMENTS THIS PERIOD

A. Total Payments to In-House Employee Lobbyists (Part III, Section A, Column 1)	\$	<u>82913.89</u>
B. Total Payments to Lobbying Firms (Part III, Section B, Column 4)	\$	<u>103000.00</u>
C. Total Activity Expenses (Part III, Section C)	\$	<u>978.80</u>
D. Total Other Payments to Influence (Part III, Section D)	\$	<u>104743.80</u>

GRAND TOTAL (A + B + C + D above) \$ 291636.49

E. Total Payments in Connection with PUC Activities (Part III, Section E) \$ 4882.68

F. Campaign Contributions: Part IV completed and attached No campaign contributions made this period

VERIFICATION

I have used all reasonable diligence in preparing this Report. I have reviewed the Report and to the best of my knowledge the information contained herein and in the attached schedules is true and complete.

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

Executed on (Date)
04/30/2018

At (City and State)
San Diego, CA

By (Signature of Employer or Responsible Officer)
Mr. Dennis Arriola

Name of Employer or Responsible Officer (Type or Print)
Mr. Dennis Arriola

Title
EVP - External Affairs & South America

PERIOD COVERED: 01/01/2018 03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART II - PARTNERS, OWNERS, AND EMPLOYEES WHOSE "LOBBYIST REPORTS" (FORM 615) ARE ATTACHED TO THIS REPORT (See instructions on reverse.)

Name and Title	Name and Title
Employee Israel Salas Government Affairs Manager	Employee Nicolina Hernandez Government Affairs Manager

If more space is needed, check box and attach continuation sheets.

PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

A. PAYMENTS TO IN-HOUSE EMPLOYEE LOBBYISTS (See instructions on reverse. Also enter the Amount This Period (Column 1) on Line A of the Summary of Payments section on page 1.)	(1) Amount This Period	(2) Cumulative Total To Date
	\$ 82913.89	\$ 605227.00

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)					
Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
Campbell Strategy & Advocacy,LLC <u>Sacramento CA 95814</u>	34000.00	0.00	0.00	34000.00	138000.00
CAPITOL STRATEGIES GROUP,INC. <u>Sacramento CA 95814</u>	36000.00	0.00	0.00	36000.00	150000.00
FERNANDEZ GOVERNMENT SOLUTIONS,LLC <u>SACRAMENTO CA 95814</u>	0.00	0.00	0.00	0.00	103500.00
Kester/Pahos <u>Sacramento CA 95814</u>	0.00	0.00	0.00	0.00	80000.00
Mercury Public Affairs <u>Sacramento CA 95814</u>	33000.00	0.00	0.00	33000.00	159000.00

If more space is needed, check box and attach continuation sheets

TOTAL THIS PERIOD (Column 4)
Also enter the total of Column 4 on Line B of the Summary of Payments section on page 1.

\$ 103000.00

PERIOD COVERED: 01/01/2018 03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)				
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each	Description of Consideration	Total Amount of Activity
03/13/2018	Eurest Dining San Diego CA 92117	Mark Ferron California ISO Boardmember	Other 42.56 Meal	\$ 978.80
	Eurest Dining San Diego CA 92117	Carla Peterman CPUC Commissioner	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	David Hochschild CEC Commissioner	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	Mary Nichols CARB Chair	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	Janea Scott CEC Commissioner	Other 42.56 Meal	
<input type="checkbox"/> If more space is needed, check box and attach continuation sheets.			TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.	\$ 978.80
D. OTHER PAYMENTS TO INFLUENCE LEGISLATIVE OR ADMINISTRATIVE ACTION <input checked="" type="checkbox"/> NOTE: State and local government agencies do not complete this section. Check box and complete Attachment Form 640 instead.				
1. PAYMENTS TO LOBBYING COALITIONS (NOTE: You must attach a completed Form 630 to this Report.)			\$ 0.00	
2. OTHER PAYMENTS			\$ 0.00	
			TOTAL SECTION D (1 + 2) Also enter the total of Section D on Line D of the Summary of Payments section on page 1.	\$ 0.00
E. PAYMENTS IN CONNECTION WITH ADMINISTRATIVE TESTIMONY IN RATEMAKING PROCEEDINGS BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION Also, enter the total of Section E on Line E of the Summary of Payments section on page 1. (See instructions on reverse.)				\$ 4882.68

PERIOD COVERED: 01/01/2018 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

- A. If the contributions made by you during the period covered by this report, or by a committee you sponsor, are contained in a campaign disclosure statement which is on file with the Secretary of State, report the name of the committee and its identification number, if any, below.

Name of Major Donor or Recipient Committee Which Identification Number if
 Has Filed A Campaign Disclosure Statement: Recipient Committee: 488235
SEMPRA ENERGY AND ITS AFFILIATES: SOUTHERN CALIFORNIA GAS CO. & SAN DIEGO GAS & ELECTRIC

- B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/28/2018	Cecilia Aguilar-Curry for Assembly 2018	1392362	\$ 2600.00
03/01/2018	Dr. Richard Pan for Senate 2018	1374058	\$ 1300.00
03/01/2018	Jay Obernolte for Assembly	1392884	\$ 1000.00
03/01/2018	Friends of Frank Bigelow 2018	1392565	\$ 1400.00
03/01/2018	Friends of Frank Bigelow 2018	1392565	\$ 4400.00
03/01/2018	O'Donnell for Assembly 2018	1393597	\$ 1500.00
03/01/2018	Phillip Chen for Assembly 2018	1392379	\$ 1500.00
03/02/2018	Evan Low for Assembly 2018	1392357	\$ 200.00
03/02/2018	Patterson for Assembly 2018	1393990	\$ 2000.00
03/02/2018	Marc Steinorth for Assembly 2018	1392851	\$ 3300.00

If more space is needed, check box and attach continuation sheets.

NOTE: Disclosure in this report does not relieve a filer of any obligation to file the campaign disclosure statements required by Gov. Code Section 84200, et seq.

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
03/02/2018	Evan Low for Assembly 2018	1392357	\$ 1800.00
03/02/2018	Voepel for Assembly 2018	1393777	\$ 2400.00
03/02/2018	Jordan Cunningham for Assembly 2018	1393016	\$ 1900.00
03/02/2018	Rodriguez for Assembly 2018	1392709	\$ 1400.00
03/02/2018	Autumn Burke for Assembly 2018	1393348	\$ 4400.00
03/02/2018	Jim Cooper for Assembly 2018	1392388	\$ 4400.00
03/02/2018	Melissa Melendez for Assembly 2018	1392806	\$ 1400.00
03/26/2018	Blanca Rubio for Assembly 2018	1393364	\$ 2000.00
03/28/2018	Piquado for Assembly 2018	1401391	\$ 2500.00
01/05/2018	Lorena Gonzalez for Assembly 2018	1392494	\$ 3100.00
01/05/2018	Dr. Richard Pan for Senate 2018	1374058	\$ 2200.00
01/05/2018	Jim Wood for Assembly 2018	1392333	\$ 2500.00
01/05/2018	Marc Berman for Assembly 2018	1392758	\$ 1500.00
02/22/2018	Tim Grayson for Assembly 2018	1392593	\$ 1100.00

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/22/2018	Marc Berman for Assembly 2018	1392758	\$ 2000.00
02/26/2018	Sabrina Cervantes for Assembly 2018	1392561	\$ 1000.00
02/26/2018	Rudy Salas for Assembly 2018	1393439	\$ 4400.00
02/26/2018	Ian Calderon for Assembly 2018	1392684	\$ 1300.00
02/26/2018	Tom Daly for Assembly 2018	1393412	\$ 2900.00
02/26/2018	Anthony Rendon for Assembly 2018	1393414	\$ 4400.00
02/26/2018	Lorena Gonzalez for Assembly 2018	1392494	\$ 1300.00
02/26/2018	Andy Vidak for Senate 2018	1373825	\$ 4400.00
02/26/2018	Chris Holden for Assembly 2018	1393404	\$ 2200.00
02/26/2018	Adam Gray for Assembly 2018	1392612	\$ 4400.00
02/28/2018	Robert Hertzberg for Senate 2018	1373423	\$ 1000.00
02/28/2018	Bill Brough for State Assembly 2018	1392528	\$ 4400.00
02/28/2018	Janet Nguyen for Senate 2018	1373835	\$ 2800.00
02/28/2018	Robert Hertzberg for Senate 2018	1373423	\$ 400.00

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/28/2018	Bill Brough for State Assembly 2018	1392528	\$ 150.00
02/28/2018	Al Muratsuchi for Assembly 2018	1392662	\$ 1000.00
02/28/2018	Brian Dahle for Assembly 2018	1393369	\$ 4400.00
02/28/2018	Andreas Borgeas for Senate 2018	1394470	\$ 2500.00
02/28/2018	Lackey for Assembly 2018	1393205	\$ 1400.00

Attachment Form 640

(Attachment to Form 635 or Form 645)

CALIFORNIA
1993 FORM

640

8/10

PERIOD COVERED: 01/01/2018--03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

For Use By: A state or local government agency that qualifies as a lobbyist employer or a \$5,000 filer. Refer to the instructions on the cover page before completing this attachment.

Other Payments to Influence Legislative or Administrative Action:

1. Total payments for overhead expenses related to lobbying activity. <u>Report as a lump sum.</u>	\$ 13626.27
2. Total payments to Lobbying Coalitions. <u>Report as a lump sum.</u>	\$ 0.00
(Form 630 must be attached)	
3. Total payments of less than \$250 during the calendar quarter for lobbying activity (excluding overhead). <u>Report as a lump sum.</u>	\$ 2257.27
4. Total payments of more than \$250 during the calendar quarter for lobbying activity (excluding overhead). Such payments must be itemized below.	\$ 88860.26
5. Grand total of "Other Payments to Influence Legislative or Administrative Action." Also enter this total on the appropriate line of the Summary of Payments section on Page 1 of Form 635 or Form 645.	<u>\$ 104743.80</u>

Itemize below payments of \$250 or more made during the quarter for lobbying activity. Provide the name and address of the payee, the amount paid during the quarter, and the cumulative amount paid to the payee since January 1 of the biennial legislative session covered by the report.

Also itemize dues or similar payments of \$250 or more made to an organization that makes expenditures equal to 10% of its total expenditures or \$15,000 or more in a calendar quarter to influence legislative or administrative action. Provide the organization's name and address, the amount paid to the organization during the quarter, and the cumulative amount paid to the organization since January 1 of the biennial legislative session covered by the report.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1
[E] - Sempra Expenses Related to Lobbying Activities San Diego CA 92101	\$ 53565.00	\$ 125933.00
[S] - Christopher Gilbride Los Angeles CA 90013	\$ 10086.12	\$ 36148.20
[P] - Bicker Castillo & Fairbanks Sacramento CA 95814	\$ 14762.31	\$ 136637.66
Subtotal of all payments itemized above	\$ 78413.43	

If more space is needed, check box and attach continuation sheets.

Attachment Form 640

(Continuation Sheet)

CALIFORNIA 1993 FORM	640
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9/10

PERIOD COVERED: 01/01/2018--03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1 Biennial Legislative Session
[P] - Imprenta Communications Group San Marino CA 91108	3800.00	9633.32
[C] - Pete Conaty & Associates Sacramento CA 95814	4000.20	6666.88
[S] - Kent Kauss Sacramento CA 95814	2646.63	2646.63

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Subtotal of all payments itemized above	\$ 10446.83	
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TEXT ANNOTATION

PAGE 1

Schedule F635

Reference No:

Assembly Bills: 813,1184,1292,1552,1745,1796,1879,1945,1954,1956,1970,2057,2061,2068,2077,2091,2092,2120,2127,2145,2195,2208 - 2267,2278,2346,2380,2407,2431,2506,2515,2551,2569,2585,2645,2672,2693,2695,2726,2832,2885,2911,3001,3073,3102,3146,3187,3 - 201,3232. Senate Bills: 100,700,819,821,901,1000,1014,1015,1016,1028,1076,1088,1135,1151,1169,1181,1205,1256,1260,1338,1339,1 - 347,1369,1370,1399,1410,1434,1440,1463,1477,1478. Offices Lobbied: Governor's office,California Legislature,CARB,CEC,CISO,CPUC - ,California Resources Agency,California State Water Board.