



Political Activities Accounting Procedure

Responsible Dept.: SoCalGas Accounting Operations
Responsible Officer: CFO
Applicability: **All Employees of SoCalGas**

EFFECTIVE DATE: 10/05/2020
REVISION DATE: 10/05/2020
REVIEW DATE: 10/05/2020
INFORMATION TYPE: **Internal**
Questions?
Contact: SoCalGas Accounting Research & Business Controls

STANDARD

1.1. Purpose

This document describes the accounting procedures and relevant business controls for recording of costs considered Below-the-Line (BTL) and Above-the-Line (ATL) for activities associated with the [Political Activities Policy](#).¹ Please refer to the [Political Activities Policy](#) and the guidance provided therein to determine if this procedure is applicable.

Costs associated with BTL activities incurred by a utility may not be recoverable through rates. The California Public Utilities Commission (CPUC or Commission) and the Federal Energy Regulatory Commission (FERC) require many of the associated expenses related to these activities to be classified as BTL, as explained further below. This document is not intended to identify activities that fall within these categories or the ultimate ratemaking treatment for a particular cost.²

2. REGULATORY BACKGROUND

2.1. FERC Account 426.4 – Expenditures for Certain Civic, Political and Related Activities

For purposes of accounting, refer to the definition utilized by FERC, found within FERC Account 426.4 - Expenditures for Certain Civic, Political and Related Activities. This account shall include expenditures for activities associated with the [Political Activities Policy that are](#):

- For the purpose of influencing public opinion with respect to the election or appointment of public officials, referenda, legislation, or ordinances (either with respect to the possible adoption of new referenda, legislation or ordinances or repeal or modification of existing referenda, legislation or ordinances) or approval, modification, or revocation of franchises; or
- For the purpose of influencing the decisions of public officials but shall not include such expenditures which are directly related to appearances before regulatory or other governmental bodies in connection with the reporting utility's existing or proposed operations.³

¹ The terms "above-the-line" (ATL) and "below-the-line" (BTL) refer to whether an income or expense item is included within (above) or outside of (below) operating income on a utility's regulatory income statement.

² For example, certain advertising costs, media costs, certain membership fees, volunteering expenses, executive compensation, donations for charitable, social or community-welfare purposes, life-insurance payments for officers and employees where the utility is the beneficiary, penalties, and others are considered below-the-line and recorded in other FERC sub-accounts. Consult with the accounting and legal departments for guidance.

³ See 18 CFR 367.4264 and specifically, 18 CFR 367.4264(a).

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2.2. BTL and ATL costs

- 2.2.1. In general, expenses attributable to normal utility operations are “**above the line**” and recoverable in rates.
- 2.2.2. Expenditures for certain Civic, Political and Related activities, should be classified as non-operating expenses and shall be treated as “**Below-the-Line**” costs and charged to FERC account 426.4. Classification of non-operating expenses does not preclude Commission consideration of proof to the contrary for ratemaking purposes.⁴

3. ACCOUNTING FOR BTL ACTIVITIES

3.1. Labor Cost (*MyTime*)

Labor costs associated with BTL activities are to be recorded in one of the following ways:

- **Automatic Allocation: 100% BTL activities**
- **Direct Charging**

Labor costs associated with the same political activities should be recorded consistently across systems (e.g. LATS, *MyTime*) and in half hour increments (0.5) to the extent possible.

3.1.1. Automatic Allocation: 100% BTL activities

- For employees of Cost Centers for which time worked is 100% directly related to performing BTL activities, labor costs should be recorded to **FERC Standing Order FG4264002200 OR a BTL internal order (“BTL IO”) established for a specific project or initiative.**
 - **FERC Standing Order FG4264002200:** Employees can setup their default accounting in *MyTime* to charge 100% of their time to **FERC Standing Order FG4264002200**. There is no requirement to complete a separate **Work Order Authorization (WOA)** and **BTL IO** for labor costs when recording time to **FERC Standing Order FG4264002200**. Labor costs recorded to **FERC Standing Order FG4264002200** are automatically recorded as BTL costs. **OR**
 - **BTL IO:** Employees can setup their default accounting in *MyTime* to charge 100% of their time to **BTL IO**. A separate **WOA** and **BTL IO is required** for labor costs when recording time to a

⁴ BTL accounting has ratemaking implications but does not dictate ratemaking, which is established through General Rate Cases (GRC) and other ratemaking proceedings. The CPUC has referenced the BTL FERC Account 426.4 in numerous ratemaking decisions, such as a 1993 SoCalGas rate case decision (D.93-12-043), noting that “SoCalGas and DRA agree that Account 426.4 is the authority for defining lobbying activities that should not be funded by ratepayers.” Section 793 of the California Public Utilities Code also requires the CPUC to adopt FERC’s system of accounts and precludes any conflict between state and federal accounting. The CPUC also adopted FERC’s Uniform System of Accounts (USOA) for gas corporations, effective September 1, 1968. Note that SDG&E’s FERC “formula rate” dictates that SDG&E may not recover expenses booked to Account 426.

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BTL IO. See **Section 3.3. Work Order Requirements.** Labor costs recorded to a **BTL IO** are automatically recorded as BTL costs.

- See **APPENDIX A** for instructions on setting up Default Labor Allocations in *MyTime*.
- See **APPENDIX B** for instructions on recording time using the Direct Charging method in *MyTime*.
- See **APPENDIX C** for a list of Cost Centers that are likely to engage in BTL Activities, which may allocate costs to **FERC Standing Order FG4264002200** or a BTL IO. This list of Cost Centers is provided as a guide; employees engaging in BTL activities should confirm with their manager the applicability of charging their time to **FERC Standing Order FG4264002200** or a BTL IO, regardless of their assigned Cost Center.

3.1.2. Direct Charging

- For employees of Cost Centers who spend time performing both BTL and ATL activities ***AND*** such allocation of time between BTL and ATL activities ***IS NOT*** consistent over a period of time, such employees must direct charge to **FERC Standing Order FG4264002200**, ***OR*** multiple BTL IOs established for a specific project or initiative and/or other appropriate internal orders.
- These employees must direct charge their time in *MyTime* on a bi-weekly basis to specific internal orders.
- See **APPENDIX B** for instructions on recording time using the Direct Charging method in *MyTime*.
- See **APPENDIX C** for a list of Cost Centers that are likely to engage in BTL Activities, which may allocate costs to **FERC Standing Order FG4264002200** or a BTL IO. This list of Cost Centers is provided as a guide; employees engaging in BTL activities should confirm with their manager the applicability of charging their time to **FERC Standing Order FG4264002200** or a BTL IO, regardless of their assigned Cost Center.

3.2. Non-Labor Costs

3.2.1. Employee Expense Reimbursements

To the extent an employee engages in BTL activities, as described in this BTL Accounting Procedure, any employee travel-related or other associated costs incurred should be charged to the appropriate BTL IO consistent with the Direct Charging Method.

3.2.2. Non-Labor Expenses

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Expenses incurred from third parties (e.g. law firms, lobbyists, consultants) by a Cost Center, must be charged to the appropriate BTL IO consistent with the Direct Charging Method. Invoices from third parties containing costs related to both ATL and BTL activities shall be itemized by the applicable third party, so the costs can be separately charged to the appropriate ATL and BTL IOs consistent with the Direct Charging Method.

3.3. Work Order Requirements

The Work Order Authorization (WOA) [manual form](#) shall be used by project managers to request **BTL IOs** for a specific project or initiative. This form, when approved by management, will be sent to the Plant Accounting Principal Supervisor for review. It will then need to be approved by the Asset & Project Accounting Manager for processing. After Asset & Project Accounting creates the **BTL IO** in Systems, Application & Products (SAP), the project manager will be notified of the **BTL IO** number, which will be used to record both labor and non-labor costs associated with their project or initiative.

Intercompany Billing

Manual WOA forms shall be used by receiving project managers to request intercompany billing **BTL IOs** for a specific project or initiative. The receiver WOA must be approved by the project manager responsible for the expense in accordance with Approval and Commitment Policy and should then be submitted to Affiliate Billing & Costing (ABC) for processing. The WOA will be reviewed and approved by the ABC Supervisor AND Financial Services Manager prior to the creation of the **BTL IO** in SAP. The project managers will be notified of the **BTL IO** number, which will be used to record both labor and nonlabor costs associated with their project or initiative.

3.3.1. Internal Order Coding

Each project associated with BTL activities will have a separate WOA and IO.

3.3.1.1. Internal Orders SAP Set Up

Internal Orders designed to track BTL activities will require the following information:

- **O&M Category⁵**: A separate O&M category code, "**OBL**", will be created and used to designate orders that capture the actual cost of BTL activities.
- **IO Description**: The IO description name will clearly identify the IO was created to track BTL activities (e.g. BTL-Sacramento Event)
- **Settlement**: IO's designed to track BTL activities will settle to FERC Account 426.4.

4. ROLES AND RESPONSIBILITIES

⁵ O&M Category is a user-defined field in SAP. For purposes of the financial statements, costs related to BTL activities will be presented as Other Income (Expenses) in the Statement of Operations.

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4.1. Vice President of Impacted Business Units

- Hold employees responsible for their obligation to comply with the BTL Accounting Procedure.
- Assign resources to support any onboarding practices and the oversight of compliance with the BTL Accounting Procedure.
- Confirm and approve month-end BTL Activity Reports on a calendar quarterly basis.

4.2. Senior Directors and Directors who supervise impacted Cost Centers

- Perform monthly review and correction, as needed, of BTL Activity Reports.
- Provide confirmation to their in-line executive(s) that the month end BTL Activity Reports have been reviewed and corrected, as needed, on a calendar quarterly basis.
- Coordinate with Operational Planning to update SAP for any changes identified during the review.
- Maintain a Subject Matter Expert that will aid in interpreting the BTL Accounting Procedure and advise whether certain transactions should be recorded as BTL.
- Implement procedures so that employees performing BTL activities have familiarity with the BTL Accounting Procedure and are aware of their responsibility to apply the appropriate accounting treatment.

4.3. Cost Center Owners

- Monitor employees' recording of time and associated expenses for compliance with this BTL Accounting Procedure.
- Be familiar with the BTL Accounting Procedure.
- Implement procedures so that employees performing BTL activities have familiarity with BTL Accounting Procedure and are aware of their responsibility to apply the appropriate accounting treatment.

4.4. Asset & Project Accounting

- Reviews and creates requested **BTL IOs** from WOA.
- Closes out WOA **BTL IOs** when notified by Business Unit that project or initiative is complete.
- Maintain **BTL IOs** in accordance with the [Company's Information Management Policy](#).

4.5. Operational Planning

- Requests creation of BTL IO using WOA at the direction of the Cost Center Owner responsible for the BTL activities.
- Creates requests for BTL IOs in sufficient detail to identify discrete matters and/or activities.
- Creates and distributes monthly BTL Activity Reports for the Cost Center Owner's review.
- Be familiar with BTL Accounting Procedure.

4.6. Accounting Research and Business Controls

- Posts the BTL Accounting Procedure to SoCalGas' intranet site [Gaslines – Policies and Procedures](#).
- Every 3 years, coordinates a review of the BTL Accounting Standard and obtain approvals of the review from the Director of Accounting Operations, VP – Controller/CFO, Chief Operating Officer, VP of Strategy and Engagement and Chief Environmental Officer, and Legal Department Representative.

5. BUSINESS CONTROLS

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5.1. Bi-Weekly Review of time reports

Managers and Supervisors with direct reports of Targeted Cost Centers listed in Appendix C will review and approve bi-weekly to ensure employees accurately record their time between ATL and BTL activities throughout the year.

5.2. Review of Expense Reports

Managers and Supervisors with direct reports of Targeted Cost Centers listed in Appendix C will review and approve employee expense reports to ensure employees accurately record their reimbursable expenses between ATL and BTL activities throughout the year.

5.3. WOA approval

Work orders authorizations are reviewed for compliance with the BTL Accounting Procedure by a Senior Accountant, Supervisor and/or Manager of Asset and Project Accounting. After the BTL IO is setup in SAP, the BTL IO in SAP is reviewed by a Senior Accountant, Supervisor and/or Manager of Asset and Project Accounting for completeness and accuracy.

5.4. Review of BTL Activity Reports

Operational Planning shall provide BTL Activity Reports on a monthly basis to Cost Centers Owners (Director-Level) listed in **Appendix C**. The Cost Center Owners that receive BTL Activity Reports shall review monthly reports within 15 days of receipt of the reports and resolve any identified discrepancies on a timely basis. The evidence of review shall be documented and maintained through a signoff and appropriate date by the Cost Center Owner at the Director Level. Electronic format is preferred. On a calendar quarterly basis, in-line executives shall confirm and approve the month-end BTL Activity Reports corresponding with the calendar quarter. The evidence of the in-line executive confirmation shall be documented and maintained through a signoff and appropriate date by the Cost Center Owner (Director Level).

6. COMPLIANCE

6.1. Training

Employees of Cost Centers listed in **APPENDIX C** will complete the Political Activities and Lobbying Training and ensure familiarity with BTL Accounting Procedure.

7. DEFINITIONS

Internal Order (IO): Internal orders are normally used to plan, collect, and settle the costs of internal jobs and tasks. The SAP system enables employees to monitor internal orders throughout their entire life cycle; from initial creation, through the planning and posting of all the actual costs, to the final settlement and archiving.

BTL IO: An internal order specifically created to track BTL-related activities.

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FERC Standing Order: For purposes of this BTL Accounting Procedure, FERC Standing Order FG4264002200 is settled to FERC Account 426.4.

Work Order Authorization (WOA): Form used by assigned project managers to request the creation of an internal order on SAP. WOA's are can be located using the following link: [Work Order Authorization](#)

8. RELATED DOCUMENTS

8.1. Policies

- [Political Activities Policy](#)
- [Approval and Commitment Policy](#)
- [Information Management Policy](#)

8.2. Appendices

- APPENDIX A, Using Default Labor Allocation in *MyTime*
- APPENDIX B, Direct Charging Method in *MyTime*
- APPENDIX C, Targeted Cost Centers that Engage in BTL Activities⁶

8.3. Resources

- [MyTime Support Materials](#)

⁶ This list of Cost Centers is provided as a guide; employees engaging in BTL activities should confirm with their manager the applicability of charging their time to **FERC Standing Order FG4264002200** or a BTL IO, regardless of their assigned Cost Center.

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APPENDIX A Using Default Labor Allocation in *MyTime*

Labor Allocation permits employees to express time and attendance information in terms of percentages; i.e., the percentage of time spent on each type of labor reflected on the timesheet. For example, suppose an employee spends six hours at Job A and two hours at Job B. Using Labor Allocation, the worker spends 75 percent of the time at Job A and 25 percent of the time at Job B.

Labor Allocation can be applied at any time slice level, such as days, weeks, etc. The records affected depend upon how your system has been configured.

1. Navigate to *MyTime* using SoCalGas' intranet site [Gaslines](#).
2. Click My Default Labor Allocation in the Time Entry area on the Home Screen.
2. Click to add a new Order and search for FG426. The assignment list for the group will be expanded.
3. Click an assignment to select it.

The work area on the right side of the screen displays the Labor Allocations for that assignment. See the following hypothetical example (screen results may differ).

The screenshot shows the 'myTIME' interface with a 'Default Labor Allocation' page. On the left, there's a 'Default Order Split' section with 'RECORDS' and an 'Insert Record' button. The main area shows a table of orders with columns 'Order' and 'Percentage'. A search bar is present with 'FG426' entered. Below the search bar, a table lists search results for 'FG426'.

Order	Percentage
FG920000 ADMINISTRATIVE AND GENERAL SALARIES	100.000

Order	Description
FG4261002200	DONATIONS
FG4264002200	EXPENDITURES-CIVIC & RELATED ACTIVITIES
FG4265002200	OTHER DEDUCTIONS (CHAMBER DUES)

****You should check with you direct supervisor if you are not sure how to complete your timesheet****

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APPENDIX B Direct Charging Method in *MyTime*

MyTime lets you record your time to specific internal orders on any bi-weekly pay period and thus overriding your default work allocation.

1. Navigate to ***MyTime*** using SoCalGas' intranet site [Gaslines](#).
2. Select the current pay period if it is not already displayed. You can change the pay period using any of the following actions:
 - Click either arrow on the Pay Period icon to move back or forward a pay period.
 - Click the Pay Period icon to access a pop-up calendar, and then select a pay period or click the Default Period button.
 - If your pay period is longer than a week and you want to enter time for the entire period, mark the Show All Weeks checkbox.
4. Create timesheet records by moving through fields and entering information in the timesheet rows.
 - Click anywhere in the row in which you want to enter time.
 - Click fields or use hotkeys to move through fields. Some useful hotkeys for navigation include the Tab key and Shift + Tab to move right and left through a row, respectively, Ctrl + Shift with one of the arrow keys (right, left, up, down) to move the insertion point one cell in the direction of the arrow, Enter to move the insertion point one cell forward (down), and Shift + Enter to expand a row for entering details or comments.
5. If you work on multiple BTL IOs, click the order column and input the correct BTL IO number or FERC Standing Order FG4264002200.
6. Click Save after every timesheet change.
7. Review Results Tab to ensure time was properly recorded.
8. Click Submit at the end of the pay period to send your time and attendance information to your manager for payroll processing.

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STEP 1: On a specific date in which BTL activities took place input internal order FG4264002200 OR specific BTL IO established for a specific project or initiative.

STEP 2: Click Save after every timesheet change

STEP 3: Review Results Tab to ensure time was properly recorded.

STEP 4: Click Submit once timesheet is complete

Week	Work Date	Pay Code	Paid Hours	Unpaid Ho..	ST Hours	VU Hours	Order	Cost Center	Reason	Vehicle Code	Rate	Gross Pay	Earnings C..
1	03/23/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
1	03/24/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
1	03/25/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
1	03/26/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
1	03/27/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
2	03/30/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
2	03/31/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
2	04/01/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200-2212			73.918	591.34	R
2	04/02/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R
2	04/03/2020	Hours Work...	8.00	0.00	8.00	0.00	FG9200002200	2200 2212			73.918	591.34	R

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Cost Center	Cost Center Description
2200-0429	SMALL C&I SEGMENT MGR
2200-2408	CES CUSTOMER EXPERIENCE
2200-2033	CUSTOMER ASSISTANCE PROGRAM LEVERAGING
2200-0402	ENERGY SAVINGS ASSISTANCE PROGRAM
2200-0231	CES NW SALES - NORTH REGION
2200-2205	ENERGY EFFICIENCY NEW CONSTRUCTION
2200-0236	FEDERAL TURNKEY PROGRAM
2200-0843	NSS - FEDERAL PROJ CUST SERVICE MGR.
2200-2561	NEW TECHNOLOGY SOLUTIONS
2200-2059	MANAGER TECHNOLOGY DEVELOPMENT
2200-0356	CARE
2200-0230	CES SE SALES - EAST REGION
2200-2628	CES DER POLICY STRATEGY MANAGER
2200-2060	CES STAFF SUPPORT
2200-2287	SGIP-SELF GENERATION INCENTIVE PROGRAM
2200-0248	CES CLEAN TRANSPORTATION
2200-0251	CES ENERGY MARKETS
2200-0232	CES SE SALES - SOUTH REGION
2200-2061	CES NW SALES - WEST REGION
2200-2588	FIELD ENVIRONMENTAL SERVICES - TRANSMISS
2200-0811	PUBLIC AFFAIRS MANAGER - LA
2200-0825	PUBLIC AFFAIRS MANAGER -NORTH
2200-0805	PUBLIC AFFAIRS MANAGER - OC
2200-0818	PUBLIC AFFAIRS MANAGER -INLAND
2200-2587	FIELD ENVIRONMENTAL SERVICES - STORAGE
2200-2320	BRANDING & CREATIVE SERVICES
2200-2396	ENERGY & ENVIRONMENTAL AFFS MGR
2200-2504	STRATEGY AND PLANNING
2200-2282	VP SCG STRATEGY & ENGAGEMENT
2200-1212	DIRECTOR OF ENVIRONMENTAL AFFAIRS
2200-2285	MEDIA & COMMUNICATIONS
2200-2576	CAPITAL PROJECTS OUTREACH
2200-2441	REGIONAL VP EXT AFFS & ENVIRON STRAT SCG
2200-2176	ENVIRONMENTAL PROGRAMS

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