

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In The Matter Of The Public Advocates
Office Investigation Pertaining To Southern
California Gas Company's Accounting
Practices, Use Of Ratepayer Monies To
Fund Activities Related To Anti-
Decarbonization And Gas Throughput
Policies, And Related Matters

Not In A Proceeding

**PUBLIC ADVOCATES OFFICE REPLY TO SOUTHERN CALIFORNIA GAS
COMPANY'S OPPOSITION TO MOTION TO COMPEL AND FOR FINES
RELATED TO THE UTILITY'S INTENTIONAL WITHHOLDING OF
CONFIDENTIAL DECLARATIONS**

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I. INTRODUCTION

Pursuant to Public Utilities Code §§ 309.5(e), 311, 314, 314.5(a), 581, 582, 584, 701, 702, and 771¹ and Administrative Law Judge (ALJ) DeAngelis' approval granted July 21, 2020, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides this Reply to Southern California Gas Company's (SoCalGas') July 17, 2020 "*Response To Public Advocates Office Motion To Compel Confidential Declarations Submitted In Support Of Southern California Gas Company's December 2, 2019 Motion For Reconsideration Of First Amendment Association Issues And Request For Monetary Fines For The Utility's Intentional Withholding Of This Information*" (SoCalGas Response).

In its response, SoCalGas continues to argue that the utility may withhold information of its choosing on claims of First Amendment rights of association, regardless of the fact that those First Amendment claims are not applicable here and have already been considered, and rejected, by Administrative Law Judge DeAngelis' November 1, 2019 ruling (ALJ Ruling).²

SoCalGas justifies its refusal to comply with state law and the ALJ Ruling by faulting the Commission for the fact that it has not ruled on SoCalGas' unauthorized Motion to Seal filed "over seven months ago."³ In so doing, SoCalGas fails to acknowledge the improper nature of that December 2, 2019 submission, and the fact that a motion has no impact unless or until it is granted.

SoCalGas' recalcitrance is unprecedented and contrary to law; even in a formal proceeding involving a Commission decision, a rehearing application does not stay the effect of the decision.⁴ By withholding the requested information based on a Motion to Seal that has never been granted, and the same First Amendment grounds that were

¹ All section references are to the California Public Utilities Code unless otherwise stated.

² The November 1, 2019 ALJ Ruling is Exhibit 1 to the instant Motion to Compel.

³ SoCalGas Response, p. 2.

⁴ California Public Utilities Code § 1735.

rejected by the November 1, 2019 ALJ Ruling, SoCalGas continues to demonstrate its contempt for this Commission.

The fines and other relief requested in Cal Advocates' instant Motion to Compel and For Fines are more than justified; they are needed to incentivize SoCalGas' compliance with state laws and the November 1, 2019 ALJ Ruling, and to dissuade other utilities from adopting similar obstructionist tactics.⁵

Contrary to SoCalGas' implications, there is no grand First Amendment right at stake in these proceedings; rather what is at stake is whether SoCalGas will be regulated, or not, by this Commission.

II. DISCUSSION

A. The Commission Must Deny SoCalGas' Motion To Seal And Make The Confidential Declarations Available to Cal Advocates

1. SoCalGas' Rationale for Withholding the Requested Information has Already Been Rejected

Once again, SoCalGas refuses to provide information that it alleges is confidential to Cal Advocates based on the erroneous proposition that there is a difference between Cal Advocates and the rest of Commission staff. SoCalGas singles out Cal Advocates, claiming that while other offices or divisions of the Commission can review the confidential declarations, "the disclosure of that information to Cal Advocates will have a chilling effect on SoCalGas' First Amendment rights" and "the harm SoCalGas seeks to protect against is precisely disclosure of its information to Cal Advocates."⁶ SoCalGas claims that the declarations attached to its Motion for Reconsideration attest to the "chilling effect that disclosure to Cal Advocates would cause to its private political activity."⁷ SoCalGas quotes the declarants, who assert that disclosure of their identities to Cal Advocates would have a chilling effect on their future communications with the utility and would cause them to seriously consider limiting their associations with

⁵ Evidently aware of SoCalGas' thus far successful stalling tactics, two other utilities have recently filed notably similar motions to quash Cal Advocates' discovery in other proceedings.

⁶ SoCalGas Response, pp. 2-3.

⁷ SoCalGas Response p. 5.

SoCalGas.⁸ Significantly, none of the declarants express a concern with the confidential declarations' availability to any other Commission staff.

As an initial matter, Cal Advocates has the same discovery rights to review the declarations,⁹ and the same obligation to keep the declarations confidential, as any other Commission staff.¹⁰ SoCalGas' arguments impose a false distinction between Cal Advocates and other Commission staff. Nothing in the Public Utilities Code permits the Commission to single out Cal Advocates for the special, discriminatory treatment that SoCalGas advocates. Indeed, ALJ DeAngelis effectively acknowledged this in her May 22, 2020 email ruling dismissing SoCalGas's similar efforts to withhold this type of information from Cal Advocates when the utility submitted its May 19, 2020 Motion to Quash.¹¹

2. SoCalGas' Rationale for Withholding the Requested Information Lacks Factual Support

Also significant is that SoCalGas and its declarants provide no factual context to support their claims that Cal Advocates' access to their identities will have a "chilling effect" on association that is protected by the First Amendment. By SoCalGas' own admission, all of the declarants are vendors and consultants hired by SoCalGas.¹² Thus, the declarants are not speaking for themselves – they are being paid to speak for SoCalGas, and to make it appear that the speech is from grass roots or public sources, rather than the utility. This is not the type of "association" protected by the First Amendment.¹³

⁸ SoCalGas Response p. 14.

⁹ See, e.g., California Public Utilities Code §§ 309.5(e), 311(a), 314, 314.5(a), 581, 582, 584, 701, 702, and 771.

¹⁰ See, e.g., California Public Utilities Code § 583. Improper disclosure is a misdemeanor.

¹¹ See the ALJ's May 22, 2020 11:09 a.m. Email Ruling that SoCalGas "today provide electronic copies of the confidential information to all Commission staff on the above service list, including the Cal Advocates Office," which is Exhibit 7 of the instant Motion to Compel.

¹² SoCalGas Response, p. 2.

¹³ The right of association protects members of a group that share common goals. As SoCalGas acknowledges, *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160, and other cases it

3. Due Process Requires the Release of the Information to Cal Advocates

If the Commission intends to rely on the declarations in any manner, due process requires – consistent with any confidentiality rules established by the Commission – that Cal Advocates be able to know who made those claims and inquire into the reasons and validity of the claims. For example, the Commission would certainly consider the declarations differently if Cal Advocates could establish that the claims were made by paid lobbyists that have not complied with reporting obligations to disclose their relationships with SoCalGas.

4. Neither the Motion to Seal, Nor the Fact That Cal Advocates Did Not Oppose It, Is Controlling Here

Once again, SoCalGas assumes that merely filing a motion allows it to circumvent Commission rules; once again, SoCalGas is wrong. As an initial matter, it is not the filing of a motion to seal that limits access, but rather the judge’s ruling granting said motion. With no ruling on its Motion to Seal, filed some seven months ago, SoCalGas has no legal basis to claim that its Motion to Seal bars Cal Advocates’ access to the declarations. Second, while motions to seal are both common and appropriately filed at the Commission, Cal Advocates is not aware of, and SoCalGas identifies, no instance where, as is the case here, such a motion has been filed in an attempt to stop an office or division within the Commission from accessing the information. Rather, such motions almost exclusively seek to protect confidential information from disclosure to the public and the filing entity’s competitors. Thus, Cal Advocates is routinely and appropriately able to access documents where a motion to file under seal has been granted. Finally,

relies on, require the entity claiming the First Amendment privilege to “demonstrate that enforcement of the [discovery requests] will result in (1) harassment, *membership* withdrawal, or discouragement of new *members*, or (2) other consequences which objectively suggest an impact on, or ‘chilling’ of, the *members*’ associational rights.” SoCalGas Motion for Reconsideration, December 2, 2019, p. 11 (emphases added). SoCalGas provides no legal support for its position that employing “hired guns” to do its bidding is the type of “association” protected by the First Amendment.

nowhere in its Motion to Seal does SoCalGas make clear that it believed or intended the motion would bar Cal Advocates access to the subject information.¹⁴

SoCalGas's contention that its Motion to File Under Seal would (even if granted) preclude Cal Advocates' access to the subject documents is rebutted by statutes such as 309.5 and 314, which allow Cal Advocates, and other Commission offices and divisions, to seek the same documents from SoCalGas at any time. Indeed, given the fact that Cal Advocates asked for the documents on June 25, 2020, and SoCalGas now refuses to provide them on the basis of its having filed a Motion to Seal, the reviewing ALJ may and should deny the Motion to Seal.¹⁵

Finally, in arguing that Cal Advocates is not entitled to the confidential declarations, SoCalGas ignores the fundamental distinction between privileged information, which is protected from disclosure, and "confidential" information, which must be made available to all offices and divisions of the Commission pursuant to law, regardless of claims of confidentiality.¹⁶ These requirements exist because SoCalGas is a regulated utility and its business is necessarily open to inspection "at any time" so that Commission staff, including Cal Advocates, can perform their job of regulating the utility.¹⁷

¹⁴ SoCalGas' suggestion that prior Cal Advocates' counsel was "notified that the Confidential Declarations were hard-copy filed with the Docket Office through the Motion to Seal, which says so explicitly" is a non-sequitur. Cal Advocates' counsel did not realize that the confidential declarations were not going to be provided to Cal Advocates. There is nothing in the Motion to Seal which reflects that the information would not be made available to Cal Advocates.

¹⁵ The ALJ may reject SoCalGas' motion in light of SoCalGas' current argument without Cal Advocates having filed any opposition when the Motion to Seal was filed.

¹⁶ SoCalGas has not claimed that the information withheld in the declarations is "privileged"; rather, it claims that the information is "confidential" or "protected." As such, the information must be provided to SoCalGas' regulators, including Cal Advocates, when requested. If that information is legitimately "confidential," and the utility has complied with the requirements of General Order (GO) 66-D, the information will be held by the Commission as confidential until the Commission rules otherwise pursuant to the same GO. In the event that the Commission determines that the information need not be maintained as confidential, GO 66-D provides that the utility will receive notice and an opportunity to comment, and to appeal any decision by the Commission on the matter. See Go 66-D, §§ 5.5 & 6.

¹⁷ See, e.g., California Public Utilities Code §§ 314 and 771.

For all of these reasons, SoCalGas' arguments that Cal Advocates has "waived" its rights to the confidential declarations because it did not protest the Motion to Seal,¹⁸ or that the Commission should apply various rules of court, are simply irrelevant here.¹⁹

B. The Proposed Fines Are More Than Justified

The over \$1 million in fines Cal Advocates seeks for SoCalGas' intentional refusal to provide the confidential declarations to Cal Advocates is not – as SoCalGas wrongly claims²⁰ – “for filing [the declarations] conditionally under seal” on December 2, 2019.²¹ Rather, as expressly stated in Cal Advocates' Motion to Compel and for Fines, the fine is proposed for each day that SoCalGas has withheld the information since June 29, 2020, the date SoCalGas expressly refused to provide the confidential affidavits demanded by Cal Advocates on June 25, 2020.

C. SoCalGas' Activities In The Aliso Canyon Investigation Are Appropriately Referenced In This Investigation

SoCalGas claims that “Cal Advocates' reference to the SED's Aliso Canyon Motion for Sanctions is inapt, as that motion was denied.”²² SoCalGas is wrong. The fact that the Administrative Law Judges denied SED's February 21, 2020 Motion for An Order to Show Cause is the very point that Cal Advocates sought to make.²³ As Cal Advocates explained:

SoCalGas' refusal to comply with the Commission Subpoena in this investigation is perhaps understandable given its prior unpunished defiance of a Commission subpoena in the Aliso Canyon investigation. Why

¹⁸ SoCalGas Response, pp. 8-12

¹⁹ SoCalGas Response, pp. 15-18.

²⁰ This is another Rule 1.1 violation.

²¹ SoCalGas Response, p. 2. See also SoCalGas Response, p. 3, which perpetuates the mischaracterization that Cal Advocates request for the confidential documents is tied to the Motion for Reconsideration.

²² SoCalGas Response, p. 8.

²³ Cal Advocates also notes that SED's request for an Order to Show cause was not denied on the merits. It was denied on procedural grounds, and without prejudice to SED raising the issues later.

should SoCalGas comply with Commission orders when there are no consequences for violations?²⁴

As emphasized in Cal Advocates' instant motion:

The need for deterrence is a primary factor driving this Motion to Compel. As demonstrated in this and other pleadings submitted to this Commission, SoCalGas is determined to violate state laws and Commission requirements to achieve its objectives, whether related to the Commission's investigation of its Aliso Canyon activities, or its astroturfing activities that undermine state and local decarbonization efforts. Only substantial fines imposed for each day of its failure to comply will have the deterrent effect needed to curb SoCalGas' determination to defy its obligations to the Commission as a regulated utility.²⁵

It is critical for the Commission to understand that SoCalGas is engaged in a strategy across multiple forums to fight the Commission, and others, through refusal to comply with long-standing state laws critical for the Commission and Courts to perform their work, and that the Commission needs to assert its authority.

D. A Formal Proceeding Is Not Needed To Fine SoCalGas

Similar to its arguments in response to Cal Advocates' June 23, 2020 Motion for Contempt and Fines, SoCalGas insists that the Commission must open formal proceedings before sanctioning it for its violations of state law and discovery orders.²⁶ For the same reasons set forth in Cal Advocates Reply regarding that motion for Contempt and Fines, no further "notice" or "process" is needed.²⁷ Indeed, the recent

²⁴ *Public Advocates Office Motion To Find Southern California Gas Company In Contempt Of This Commission In Violation Of Commission Rule 1.1 For Failure To Comply With A Commission Subpoena Issued May 5, 2020, And Fined For Those Violations From The Effective Date Of The Subpoena* (June 23, 2020 Motion for Contempt and Fines), p. 4.

²⁵ *Public Advocates Office Motion To Compel Confidential Declarations Submitted In Support Of Southern California Gas Company's December 2, 2019 Motion For Reconsideration Of First Amendment Association Issues And Request For Monetary Fines For The Utility's Intentional Withholding Of This Information; [Proposed] Order*, submitted July 9, 2020, p. 10.

²⁶ SoCalGas Response, pp. 19-26.

²⁷ See July 10, 2020 "*Public Advocates Office Reply To Southern California Gas Company's Response To Motion For Findings Of Contempt And Fines For The Utility's Failure To Comply With A Commission Subpoena Issued May 5, 2020*," pp. 5-8.

discovery fine imposed by the Los Angeles Superior Court in the Aliso Canyon civil litigation demonstrates that additional process is not required, and that fines are necessary to prompt SoCalGas to comply with fundamental discovery requirements.²⁸ Finally, contrary to SoCalGas claims, there are no material factual issues in dispute, as the only material facts are that Cal Advocates requested SoCalGas to provide the confidential declarations, and the utility has refused to do so.²⁹

III. CONCLUSION

For the reasons set forth above, Cal Advocates moves for this Commission:

- (1) To sanction SoCalGas for its flagrant violations of state laws and Commission requirements as set forth in the instant Motion to Compel and Proposed Order;³⁰
- (2) To put SoCalGas on notice that the Commission may determine that no SoCalGas costs associated with this Cal Advocates investigation may be recovered in rates, including, without limitation, SoCalGas' outside counsel and consultant costs;
- (3) To put SoCalGas on notice that the Commission may require SoCalGas shareholders to reimburse all Cal Advocates costs, including staff costs, associated with this Cal Advocates investigation; and

²⁸ SoCalGas' discovery abuses in the Los Angeles Superior Court case *Gandsey v. SoCalGas* (civil litigation related to Aliso Canyon) are described at pages 30-31 of Cal Advocates June 1, 2020, "Response Of Public Advocates Office To Southern California Gas Company Motion To Quash Portion Of Subpoena, For An Extension, And To Stay Compliance." Among other things, the Minute Order in that case – which is Exhibit 16 in the June 1, 2020 Cal Advocates' pleading - found that "[b]ased on the prior history of this case, [SoCalGas'] initial claims of privilege are unsupportable and/or are withdrawn an average of 94 percent of the time." *Gandsey* February 20, 2020 Minute Order, pp. 2-3.

²⁹ SoCalGas Response, pp. 22-23.

³⁰ SoCalGas' claim that "[t]here are no Data Requests that have been outstanding for three months" is false. If that were the case, there would be no reason for SoCalGas to continue to amend and revise its data responses, which were not accurate or complete when provided to Cal Advocates, notwithstanding that SoCalGas set its own schedule for production of the responses. See attached Exhibit 1, July 17, 2020 Letter from J.Wilson to T.Bone.

(4) To order SoCalGas to include Cal Advocates on any communications even remotely related to the Cal Advocates investigation that are shared with any Commission decisionmaker.³¹

Respectfully submitted,

/s/ TRACI BONE

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July 24, 2020

³¹ See attached Exhibit 2, July 17, 2020 Letter from D.Skopec to CPUC Commissioners and Executives. Cal Advocates only learned of this letter on Monday, July 20, 2020 through a Commissioner' office. SoCalGas did not share this letter with Cal Advocates when it was sent on July 17, 2020, and, as of the date of this Reply, has not provided a copy of the letter to Cal Advocates, notwithstanding the fact that it advocates for formal Commission proceedings to address the same issues being addressed in this Cal Advocates investigation.

EXHIBIT 1

July 17, 2020 Letter from J.Wilson to T.Bone

July 17, 2020

VIA E-MAIL

Traci Bone
Public Advocates Office
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Re: *Expected Timing of Remaining Data Requests in DR 15 and the Amended Lobbying Responses*

Dear Traci:

I am writing to provide you with an update regarding our timetable for responses to Cal Advocates' DR 15 as well as provide a further update on the amendments to the lobbying responses.

As you know, we have provided responses for 15 out of the 25 questions in DR 15 as of last week Friday, July 10, 2020. With respect to the remaining responses, we are trying to meet the following schedule:

Questions 1, 6, 12, 13, 14, 15. SoCalGas hopes to have these responses completed by Friday, July 24, 2020.

Questions 4, 5, 22 and 24. SoCalGas hopes to have these responses completed by Friday, August 7, 2020.

With respect to amendments to the lobbying responses, we experienced an unexpected delay. SoCalGas now hopes to get out the amended lobbying responses related to LA Metro, which are DR 11, Questions 1 to 6, and DR 12, Questions 13 to 17 and 19, out by the middle of the next week. We do not currently have a time estimate of the Long Beach lobbying responses. However, we are hopeful that we can give you an estimate by next week Wednesday.

We realize that you wanted all of the amended responses on lobbying by today. However, as you know, SoCalGas has been busy on many fronts, including responding to Cal

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Advocates' motions seeking \$5.5 million in fines in the last month. Understandably, SoCalGas had to defend itself against these demands for fines which, in SoCalGas's view, are both unjustified and violations of due process.

Very truly yours,



Jason H. Wilson



EXHIBIT 2

July 17, 2020 Letter from D.Skopec to CPUC Commissioners and Executives



Dan Skopec
Vice President, Regulatory Affairs
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July 17, 2020

Sent Via Email

Dear President Batjer and Commissioners:

This letter is to request that the California Public Utilities Commission (CPUC or Commission) open two proceedings with respect to the tracking, accounting, and ratemaking treatment for costs associated with education, lobbying, and advocacy activities.

First, SoCalGas respectfully requests that the CPUC open a statewide Order Instituting Rulemaking (OIR) to:

- (1) Establish clarity for SoCalGas and the other investor-owned utilities (IOUs) on the ratemaking treatment for lobbying and other advocacy activity;
- (2) Establish clear definitions of lobbying for accounting purposes; and
- (3) Create the structure for cost allocation studies of lobbying to be used in future General Rate Cases (GRCs).

Second, SoCalGas requests that the Commission open a formal investigation of SoCalGas through an Order Instituting Investigation (OII), to be performed concurrent with the statewide OIR. While such a request is unprecedented, an inquiry is vital for achieving clarity on compliance with Commission rules regarding how costs are allocated to ratepayers, in particular before such activities inform rates in SoCalGas's next GRC cycle.

Specifically, there is a lack of clarity in how the CPUC approves costs for education, lobbying and advocacy, particularly for local level activity when multiple utilities work simultaneously to meet the State's climate goals and educate customers about emerging clean energy technology and fuel options.

For decades, SoCalGas has relied on the Federal Energy Regulatory Commission's (FERC) definition of lobbying for accounting above or "below the line." The CPUC itself has applied this definition for decades in IOUs' GRCs. Most recently, SoCalGas relied upon this definition in SoCalGas's Test Year (TY) 2019 GRC, concluded in September 2019, and the CPUC did not disallow such advocacy activities.

It is evident, however, that gray areas exist in ratemaking treatment for lobbying activity. GRC decisions have varied depending on the IOU or facts litigated during a formal 3- to 4-year proceeding. SoCalGas believes it is beneficial for all IOUs to gain clarity on ratemaking treatment going forward.¹

Additionally, to enhance transparency and efficiency, SoCalGas will have an independent, third-party review performed of its accounting of the costs in question. As with every GRC cycle in which accounting is reviewed and adjusted if necessary and as appropriate to charge to below-the-line FERC accounts, such costs would be removed from SoCalGas's next GRC TY 2024 forecast, so as to not be recovered in rates.² SoCalGas will share the results of this review with the Public Advocates Office (Cal Advocates), the Energy Division, and the Commission.

Because GRCs are further out in the future and can vary in Commission guidance, we ask the Commission to turn its attention to this important issue at the earliest possible opportunity. Rapidly evolving decarbonization policies and local advocacy in support of them throughout the state present unique challenges for SoCalGas and other entities working in this sector. SoCalGas's request for an inquiry would help achieve both clarity on compliance with Commission rules as well as ensuring proper cost allocation to ratepayers prior to the next GRC cycle.

¹ For example, on June 25, 2020, in Rulemaking 19-01-011, the Administrative Law Judge brought within scope of that proceeding the issue of whether funding of Californians for Balanced Energy Solutions (C4BES) is eligible for cost recovery from ratepayers. The scope of inquiry in R.19-01-011 is limited to ratepayer funding of C4BES. Given the importance for all IOUs to gain clarity on ratemaking treatment and the limited scope of inquiry in R.19-01-011, SoCalGas believes that a statewide OIR is still needed to address the issue more broadly to avoid additional piecemeal litigation.

² SoCalGas's TY 2019 GRC sets a total revenue requirement for the test year in 2019, and "attrition" years thereafter. Attrition years approved in the final Decision (D.) 19-09-051 were 2020 and 2021. Furthermore, D.20-01-002 adopting 4-year GRC cycles for IOUs moved SoCalGas's current cycle to 5 years (2019-2023) and extends our next GRC filing date to May 2022 for the TY 2024 cycle. In SoCalGas's GRCs, the historical years up to the "base year" are considered, typically a 5-year historical period. Thus, in its TY 2019 GRC, the base year was 2016 and SoCalGas's forecasts incorporated data from 2012-2016. As such, incurred costs from 2017 onward will be assessed to inform future GRC rates for the TY 2024 cycle when those GRC forecasts are prepared leading up to SoCalGas's May 2022 Application and a final decision at the end of 2023 (according to the revised Rate Case Plan schedule) is issued to set SoCalGas's revenue requirement.

We respectfully submit that timely clarity from the Commission in a formal proceeding with an evidentiary record best serves the public interest. For stakeholders to know that SoCalGas and other IOUs work in the best interest of the State and their customers, an open forum governed by rules of practice and procedure, while not without cost, delivers the greatest possible transparency.

SoCalGas looks forward to working with the Commission on this important matter.

Sincerely,



Dan Skopec
Vice President – Regulatory Affairs

cc: Alice Stebbins
Arocles Aguilar
Edward Randolph

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of “*Public Advocates Office Reply To Southern California Gas Company’s Opposition To Motion To Compel And For Fines Related To The Utility’s Intentional Withholding Of Confidential Declarations*” to the following persons by electronic mail:

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Executed on **July 24, 2020** at San Francisco, California.

/s/ TRACI BONE

TRACI BONE