

## **SOUTHERN CALIFORNIA GAS COMPANY**

**(DATA REQUEST CALADVOCATES-TB-SCG-2020-02)**

**DATE RECEIVED: March 20, 2020**

**DATE SUBMITTED: April 21, 2020 (question 12)**

**DATE SUBMITTED: April 24, 2020 (questions 6-8)**

**DATE SUBMITTED: April 28, 2020 (questions 1-2)**

**DATE SUBMITTED: May 8, 2020 (question 11 & amended question 2)**

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### **OBJECTIONS TO “INSTRUCTIONS”**

1. SoCalGas objects to the Instructions and Definitions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Further, SoCalGas objects to the Instructions to the extent they purport to impose requirements exceeding that required by GO 66-D or the Discovery Custom and Practice Guidelines provided by the CPUC.
2. The highlighted paragraph under “Responses” purports to require SoCalGas identify “the person providing the answer to each question and his/her contact information.” SoCalGas objects to this instruction because it has no basis in the Commission’s Rules of Practice and Procedure and exceeds that required by the Discovery Custom and Practice Guidelines provided by the CPUC.
3. The highlighted portion of the paragraph under “Requests for Clarification” purports to require SoCalGas to notify Cal Advocates “within five (5) business days” if “a request, definition, or an instruction is unclear”; the highlighted paragraph under “Objections” purports to require SoCalGas to “submit specific objections, including the specific legal basis to the objection . . . within five (5) business days”; and the highlighted portion of the paragraph under “Assertions of Privilege” in the “Instructions” section of this Request further purports to require SoCalGas to “assert any privilege for documents responsive to this data request . . . within five (5) business days.” SoCalGas objects to these requirements as unduly burdensome and unreasonable as SoCalGas cannot determine which aspects of the Request need clarification, formulate objections or identify privileged information and documents until SoCalGas has otherwise completed its investigation and prepared its response to the Request.
4. The highlighted paragraph under “Sensitive Personal Identifying Information” purports to exclude from the category of properly redacted information the names of SoCalGas employees. SoCalGas objects to this request on the grounds that it is inconsistent with GO 66-D and unilaterally pre-judges the outcome of the GO 66-D procedures.
5. The first highlighted paragraph under “Signed Declaration” purports to require SoCalGas to provide “a signed declaration from a responsible officer or an attorney under penalty of perjury that [SoCalGas has] used all reasonable diligence in preparation of the data response, and that to the best of [his or her] knowledge, it is true and complete.” SoCalGas objects to this instruction because it has no basis in the Commission’s Rules of Practice and Procedure. SoCalGas further objects to the extent it purports to limit SoCalGas from amending its responses should additional information be later discovered. SoCalGas reserves its right to amend its responses to these requests should additional information relevant to SoCalGas’s responses is discovered at a later date.

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6. SoCalGas objects to the second highlighted paragraph under “Signed Declaration” to the extent it purports to impose requirements exceeding the process for submitting confidential information to the Commission outlined in GO 66-D § 3.
7. In addition to the above objections, it should be noted that the data request is directed to SoCalGas defines “you” to mean SoCalGas, yet the request also seeks information from Sempra Energy. Sempra Energy has agreed to cooperate and, at the request of SoCalGas, to provide information to SoCalGas for submittal in these responses. Nothing herein is intended to waive Sempra Energy’s right to object in the future to any request seeking information that is not relevant to a SoCalGas matter. The responses below indicate which information was provided from Sempra Energy; the responses are otherwise by SoCalGas.

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**QUESTION 1:**

Please provide all documents related to SoCalGas and Sempra training and reporting programs that are used to ensure compliance with the Sempra Energy Political Activities Policy (Policy). See Policy at Section 1, p. 1 (“the company has a robust training and reporting program in place to ensure compliance”).

**RESPONSE 1:**

SoCalGas objects to this question as overbroad and unduly burdensome. Notwithstanding this objection and the Objections to the Instructions which are expressly incorporated herein, SoCalGas responds as follows:

SoCalGas is providing SoCalGas’s formal group training presentations and text inserted into a computer program to train employees on the Sempra Energy Political Activities Policy. These materials were provided by Sempra Energy. See the attached zip folder titled “LATS Training Docs” that contains 25 documents and an excel sheet with a listing of all documents.

**Amended Response – Submitted May 8, 2020**

SoCalGas is re-submitting the training materials with no redactions, but rather including confidentiality markings and a confidentiality declaration.

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**QUESTION 2:**

Regarding the Policy's requirement at page 3 under "Lobbying" that all employees who engage in lobbying activities are required to report their activity in LATS, please explain what "LATS" is and all of the data fields it contains.

**RESPONSE 2:**

SoCalGas directs Cal Advocates to the documents produced in response to Question 1. As explained in the documents, LATS is the "Lobbying Activity Tracking System." The system serves as a centralized repository used for Sempra's collective political reporting purposes. The fields in LATS were provided by Sempra Energy and include:

**Lobbying Activity**

Name of Person Lobbied

Position of Person Lobbied

Title of Person Lobbied

Jurisdiction

Agency

Date Start/End

Number of Hours Spent Lobbying

Description

Expenses

Admin Testimony – can be checked

**Amended Response to the Lobbying Activity Fields – Submitted May 8, 2020**

Reporting For A Meeting With – you can check "One Person" or "More Than One Person"

At login you can check – "I'm reporting data for myself" or "entering data for someone else"

Additional Dynamic Fields – they appear if a specific field above is entered:

Proceeding Number (if Admin Testimony is checked at the top)

Name of Elected Official (if Position of Person Lobbied is "Elected Official Staff")

Office of Elected Official (if Position of Person Lobbied is "Elected Official Staff")

State (if State is jurisdiction)

County (if County is jurisdiction)

City (if City is jurisdiction)

Note – When one logs into LATS, the system knows which employee is accessing the system and therefore when the LATS data is provided, the name of the employee who conducted the

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activity will be included. This is true even if the LATS entries were done by an admin on behalf of an employee, the employee's name who conducted the activity will be provided in the LATS data. Upon login, the system automatically records a record ID, proxy ID and Employee ID. There are also defunct fields in the system that cannot be filled out and have no data in the period of time requested.

**Retained Lobbyist Firms/Organizations**

Firm

Invoice Number

Amount Paid

Percentage toward lobbying

Date paid

**Gift of Business Courtesy**

Full Name of Recipient

Position of Recipient

Title of Recipient

Jurisdiction

Date of Gift or Event

Establishment

Gift Event Address

Gift Event City

Gift Event State

Gift Even Zip

Value/Cost of Gift Benefiting Only the Public Official

Total Value/Cost of the Entire Activity

Method of Payment

Describe the Gift

Office Address

Office City

Office State

Office Zip

Was guest specified by company?

Guest Name

Reimbursement Amount

Reimbursement Date

**Personal Political Contributions**

Employee ID

Jurisdiction

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Candidate or Ballot Measure Committee  
Candidate Controlling the Ballot Measure Committee  
Date of Contribution  
Amount of Contribution  
Check Number  
Name of Fundraiser

**Political Fundraiser Request**

Full Name of Candidate  
Current Office  
Office Seeking  
Jurisdiction  
Election Date  
Current Positions (Boards, Agencies, etc.)  
Description  
Employee Host  
Date of the Event  
Location  
Costs  
Business Unit covering the costs  
Post Fundraiser Results – Amount Raised  
Total Final Event Costs

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**QUESTION 3:**

Please identify all SoCalGas and Sempra Energy employees who have LATS entries for activity between January 1, 2015 and today and provide copies of all such LATS entries.

**RESPONSE 3:**

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**QUESTION 4:**

Please identify all SoCalGas and Sempra Energy employees who have engaged in lobbying activities at any time between January 1, 2015 and today who do not have LATS entries, and explain why they do not have LATS entries.

**RESPONSE 4:**



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**QUESTION 5:**

Please identify all SoCalGas and Sempra Energy employees who have lobbied at any time between January 1, 2015 and today regarding issues related to decarbonization.

**RESPONSE 5:**

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**QUESTION 6:**

Please explain how SoCalGas and Sempra decide whether an employee's work should be allocated to shareholders or ratepayers and who makes such a determination. If this determination varies by business unit, please explain the process for each business unit.

**RESPONSE 6:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. SoCalGas further objects to the Request with respect to business unit determinations to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas' GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows:

Generally, SoCalGas employees charge their bi-weekly labor expenses based upon the appropriate accounting information for the specific activity or activities being supported. All labor expenses contain three pieces of information: a cost center, an internal order, and an expense type or cost element such as straight-time labor and overtime labor. Generally, the determination whether to allocate these expenses to ratepayers or shareholders is made by the business units, along with staff that works on SoCalGas' GRC. This determination is based on the nature of the labor activity as identified by the three accounting criteria described above and reflects management's determination of whether the costs are likely to be deemed operating costs by the Commission, including consideration of past GRC commission decisions and other precedent, if any.

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**QUESTION 7:**

Please explain how SoCalGas and Sempra record the cost of employee work that is shareholder-funded, and the accounts where such time is recorded.

**RESPONSE 7:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. For the purpose of responding to this question, SoCalGas defines “cost of employee work” as labor expenses. SoCalGas further objects to the Request to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas’ GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows:

As a preliminary matter, the method for recording costs (accounting) does not dictate ratemaking treatment. They are related, but not the same. As described in response to Question 6, 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.

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Another example can be found in the TY2019 GRC workpapers of SoCalGas witness Lisa Alexander Exh. SCG-21-WP. The witness team made adjustments to remove incurred costs that were identified as potentially lobbying related activities based upon the FERC definition of lobbying. These adjustments can be found on pages 16-17, 25-26, 34-35, and 41.

<https://www.socalgas.com/regulatory/documents/a-17-10-008/SCG-21-WP%20LAlexander%20Customer%20Services%20-%20Technologies,%20Policies%20&%20Solutions.pdf>

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**QUESTION 8:**

Please explain how SoCalGas and Sempra record the cost of employee work that is ratepayer-funded, and the accounts where such time is recorded.

**RESPONSE 8:**

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous in defining which employee, which activity, which business unit, and what time period is in question. SoCalGas further objects to the Request to the extent it would require SoCalGas to search its files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to Cal Advocates, which was a party to all of SoCalGas' GRC or other ratemaking proceedings that might have relevance to its questions. SoCalGas will not search through their files for or produce matters of public record in CPUC regulatory proceedings and Cal Advocates should coordinate with its staff who worked on these matters. Notwithstanding these objections and the Objections to the Instructions which are expressly incorporated herein, SoCalGas [and Sempra] respond[s] as follows: Please see Responses to Questions 6 and 7.

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**QUESTION 9:**

For all SoCalGas and Sempra Employees who have lobbied at any time between January 1, 2015 and today on behalf of either organization, please identify by each employee and for each year the portion of their time allocated to ratepayer-funded lobbying, and quantify the monetary value of that work for each employee by year.

**RESPONSE 9:**

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**QUESTION 10:**

For all SoCalGas and Sempra Employees who have lobbied at any time between January 1, 2015 and today on behalf of either organization, please identify by each employee and for each year the portion of their time allocated to shareholder-funded lobbying, and quantify the monetary value of that work for each employee by year.

**RESPONSE 10:**

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**QUESTION 11:**

Please provide a fully executed copy of the entire contractual agreement between SoCalGas and Marathon Communications Inc. including the confidentiality provision which prevents SoCalGas from releasing the prices that Marathon charges for their services without being in breach of contract. Please also provide supporting documentation to demonstrate that this contract is binding on SoCalGas and has not been superseded by any other contract.

**RESPONSE 11:**

SoCalGas objects to the question to the extent that it calls for a legal conclusion and is not aimed at obtaining factual information.

The above question does not specify what contract with Marathon Communications Inc. is the subject of the question. SoCalGas answers this question pertaining to two contracts that have been provided in previous responses:

Contract #566052135 – provided in DR-1

This contract was amended five times (amendments produced in response to DRs 1 and 5)

Contract #5660049620 – provided in DR-12

The contracts were not superseded by a later contract.

Notwithstanding that objection, SoCalGas clarifies that it does not opine on the merits of potential liability under any particular legal theory, contractual or otherwise. With respect to the factual portion of the question posed, SoCalGas would not release the prices that Marathon charges for their services because disclosure of market sensitive information such as vendor pricing may increase the costs to SoCalGas and its ratepayers, and SoCalGas considers such information to be protected under Paragraph 27 of the agreement. It is established that pricing information of third-party vendors and contractors is entitled to confidential treatment. See, e.g., D. 14-12-053, 2014 WL 7437489, at \*6-8 (Cal. P.U.C. Dec. 18, 2014) (granting motion to seal “the contents of an ex parte communication containing pricing data from a third party vendor,” the public disclosure of which would put the regulated entity “at a competitive disadvantage”); D.11-01-036, 2011 WL 660568 (Cal. P.U.C. Jan. 27, 2011) (granting motion to seal “confidential prices and contract terms specifically negotiated with a program vendor, and protected by a confidentiality agreement in [the regulated utility’s] contracts with its vendors” which the utility represented was “proprietary and commercially sensitive, and should remain confidential”); *id* (noting that the Commission has “granted similar requests” to seal similar information “in the past”). Further, it is industry custom



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among regulated energy utility companies to treat as confidential pricing terms entered into with third-party vendors. See Proposed Confidentiality Matrix prepared by Joint Energy Utilities dated March 29, 2018, at 28 (proposing to treat as presumptively confidential “[v]endor bid and pricing information (including rates and invoices); and “vendor proprietary information”); see also Communications Industry Confidentiality Matrix, R. 14-11-001, at 6 (filed Oct. 3, 2017) (proposing to treat as presumptively confidential “[c]ontracts and agreement between or among . . . vendors and/or third parties” because “parties to such contracts agree that the terms are confidential, and most contracts contain express provisions to that effect”). It is also well established that certain pricing is deemed to be competitively sensitive information and that the disclosure or exchange of competitively sensitive information, such as pricing, potentially raises antitrust concerns. See Antitrust Guidelines for Collaborations Among Competitors [https://www.ftc.gov/sites/default/files/documents/public\\_events/joint-venture-hearings-antitrust-guidelines-collaboration-among-competitors/ftcdojguidelines-2.pdf](https://www.ftc.gov/sites/default/files/documents/public_events/joint-venture-hearings-antitrust-guidelines-collaboration-among-competitors/ftcdojguidelines-2.pdf). The Federal Trade Commission has also prosecuted the exchange of sensitive business information even though the conduct did not meet the standards for the Sherman Antitrust Act. See, e.g., <https://www.ftc.gov/enforcement/cases-proceedings/1210184/bosley-inc-aderans-america-holdings-inc-aderans-co-ltd>.

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**QUESTION 12:**

For the period between January 1, 2015 and today, please provide all documents submitted to the to the California Public Utilities Commission pursuant to General Order 77 by SoCalGas and Sempra Energy, including both the public and confidential versions of such submissions. To the extent such submissions are available on the company's website, you may provide a link to that information.

**RESPONSE 12:**

Notwithstanding the Objections to the Instructions which are expressly incorporated here in, SoCalGas [and Sempra] respond[s] as follows: The reports that have been submitted since January 1, 2015 include reports for years 2014-2018. The public versions of these reports for SoCalGas years 2016, 2017 and 2018 can be found at:  
<https://www.cpuc.ca.gov/General.aspx?id=6442454119>.

The public versions for years 2014 and 2015 are attached.

Confidential versions of SoCalGas's GO 77-M reports for 2014-2018, with an accompanying confidentiality declaration are attached.

**The attachments include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.**

Sempra Energy does not submit a separate GO 77-M report.