

DRA DATA REQUEST
DRA-SCG-139-DAO
SOCALGAS 2012 GRC – A.10-12-006
SOCALGAS RESPONSE
DATE RECEIVED: AUGUST 3, 2011
DATE RESPONDED: AUGUST 18, 2011

Exhibit Reference: SCG-2, SCG-3, SCG-5, SCG-15

Subject: GHG Programs Cost Recovery

Please provide the following:

1. With regard to SCG's request for funding to prepare and submit annual Greenhouse Gas reports to the Environmental Protection Agency, the California Air Resources Board, or any other environmental agency, as discussed in SCG-2, SCG-3, SCG-5, and/ or SCG-15, did SCG also request the funding for such costs in any other proceedings either in the past or currently pending before the Commission? If so, please identify the funding amount requested and the proceeding number.

SoCalGas Response:

SoCalGas has included in this GRC the funding requests for the preparation and submittal of annual Greenhouse Gas reports to the EPA and California Air Resources Board. SoCalGas has not asked for funding for new GHG related reporting costs in other proceedings before the Commission. SoCalGas Advice Letter 4230 filed on April 1, 2011, requested authorization to establish the General Rate Case Memorandum Account which would include a GRC Margin Subaccount (GRCMA) and a New Environmental Regulation Subaccount (NERS). Draft Resolution G-3460, if approved by the Commission as currently drafted, would grant SoCalGas' request to establish the GRCMA but would deny the request to include a NERS subaccount. The purpose of the NERS was to ensure that costs associated with new environmental regulations are considered for future recovery effective back to January 1, 2012 (including the cost to prepare and submit annual Greenhouse Gas reports to the Environmental Protection Agency, the California Air Resources Board, or any other environmental agency), pending the outcome of the utilities' request in the GRC for a similar balancing account.

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2. With regard to SCG's request for funding to perform any Greenhouse Gas leak detection in order to report to the Environmental Protection Agency, the California Air Resources Board, or any other environmental agency, as discussed in SCG-2, SCG-3, SCG-5, and/or SCG-15, did SCG also request the funding for such costs in any other proceedings either in the past or currently pending before the Commission? If so, please identify the funding amount requested and the proceeding number.

SoCalGas Response:

The GHG leak detection related costs for reporting are included only in SoCalGas' current GRC.

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3. With regard to SCG's request for funding to mitigate GHG emission levels in order to be in compliance with the Environmental Protection Agency, the California Air Resources Board, or any other environmental agency, as discussed in SCG-2, SCG-3, SCG-5, and/or SCG-15, did SCG also request the funding for such costs in any other proceedings either in the past or currently pending before the Commission? If so, please identify the funding amount requested and the proceeding number.

SoCalGas Response:

SoCalGas' is requesting funding in the current GRC for GHG-related requirements to meet new environmental laws as described in Ms. Lisa Gomez testimony, SCG-15. SoCalGas also filed a joint application with SDG&E, SCE, and PG&E (A.10-08-002) on August 2, 2010, requesting cost recovery for fees associated with the ARB's AB32 Cost of Implementation on an interim basis until approval of each IOU's GRC that would subsequently approve recovery of these fees. A phase 1 decision was issued by the CPUC in Dec 2010, authorizing each IOU to establish a memorandum account to record its actual expenditures to comply with the AB 32 cost of implementation fee. The cost recovery phase of the proceeding is currently ongoing.

SoCalGas filed a joint application with SDG&E (A. 07-08-031) on August 31, 2007 for approval of measures set forth in their Joint Climate Action Initiative. This Initiative was a proposal for early action to reduce greenhouse gases. This initiative was subsequently withdrawn by SoCalGas (Decision 08-09-011) on September 4, 2008. .

SoCalGas filed a joint advice letter with SDG&E (Advice No. 4172) for non-tariffed products and services relating to the production and conditioning of biogas. This Advice Letter was rejected without prejudice by the CPUC on August 9, 2011.