

**SIERRA CLUB- UCS DATA REQUEST**  
**SIERRA CLUB-SCG-004**  
**SOCALGAS 2019 GRC – A.17-10-008**  
**SOCALGAS RESPONSE**  
**DATE RECEIVED: APRIL 4, 2018**  
**DATE RESPONDED: APRIL 23, 2018**

1. Data Response 2(b) to Sierra Club/UCS-SoCalGas-01 identifies proposed vehicle replacements in categories that include “Class 5 AFV”. Response 12 to Sierra Club/UCS-SoCalGas-02 characterizes the Class 5 AFV identified in Response 2(b) as within the “heavy duty trucks & vans” category.
  - a. Does SoCalGas own or operate other classes of vehicles that are within the “heavy duty trucks and vans” category aside from Class 5 vehicles? If yes, please identify the number and type (Class 6 etc) of each vehicle.
  - b. Are the heavy duty trucks identified in Response 4(a) to Sierra Club/UCS-SoCalGas-01 Class 5 vehicles? If not, please identify the class of each heavy duty vehicle identified in this response.

**SoCalGas Response 1:**

a. SoCalGas objects to this request on the grounds that it is vague and ambiguous. SoCalGas objects to this request to the extent it lacks foundation and assumes facts not in evidence. Subject to and without waiving these objections, SoCalGas responds as follows: Vehicle “classes” in the prior responses refers to SoCalGas-defined classification of vehicles and not DOT classifications. Please see below for SoCalGas’ Vehicle Type Classifications and Criteria. The “Class 5 AFV” represents a forecasted replacement of a SoCalGas defined Class 5 Vehicle Type – Heavy Duty Truck listed below.

SoCalGas Vehicle Type Classification:

- **1 = AUTOMOBILES (Up TO 6,000 GVW)**
- **2 = COMPACT TRUCK & VANS (Up TO 6,000 GVW)**
- **3 = LIGHT TRUCK & VANS (6,001 GVW TO 10,000 GVW)**
- **4 = MEDIUM DUTY TRUCK (10,001 GVW TO 30,000 GVW)**
- **5 = HEAVY DUTY TRUCK (ABOVE 30,001 GVW)**
- **6 = MECHANIZED TRAILER (SELF PROPELLED OR USES FUEL)**
- **7 = NON MECHANIZED TRAILER (IS NOT SELF PROPELLED AND DOESN’T USE FUEL)**
- **8 = P.O.E. / M.W.E. (ANY OTHER NON TRAILER EQUIPMENT)**
- **9 = OTHER**

b. Please see response 1a.

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2. Please provide the average daily mileage for each class of vehicles in the SoCalGas fleet.

**SoCalGas Response 2:**

SoCalGas does not track total vehicle miles traveled or average daily mileage for each class of vehicle.

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3. In Exhibit SCG-23-R (Herrera Revised Direct Testimony), page CLH-53:23 to CLH-54:14 lists 11 “enhancements to SoCalGas’ current infrastructure” that would be funded under the requested capital for NGV refueling stations. Page 7 of Confidential Testimony SCG-23-WPS lists anticipated expenses from 2017 through 2019 for upgrades to existing SoCalGas NGV stations. These expenses vary significantly between refueling stations.

- a. Please explain the specific enhancements that will be made to each existing fueling station identified on Page 7 of Exh. SCG-23-WPS.
- b. Please explain the basis for difference in cost between the upgrades proposed for the existing refueling stations listed on Page 7 of Exh. SCG-23-WPS.
- c. Enhancement 2 identified on page CLH-53 is to “upgrade[] stations to meet the refueling requirements on heavy duty CNG vehicles.”
  - i. Do costs to upgrade stations to meet refueling requirements for heavy duty CNG vehicles vary by class of heavy duty vehicle (e.g. higher cost to meet requirements for Class 8 vehicle than for Class 5)? If yes, what class of heavy duty vehicle are the proposed upgrades to existing refueling stations intended to accommodate?

**SoCalGas Response 3:**

- a. The following represents a listing of known upgrade requirements by site:  
Azusa: Install additional slow-fill stations, trenching, canopy, pricing signage.  
Compton: Install compressor, upgrade dryer and controls (increase throughput)  
Garden Grove: Upgrade Public access- canopy and pricing signage  
Murrieta: Install secondary compressor  
San Pedro: Install secondary compressor  
Autogas: software upgrade  
ERC: Equipment replacement to increase capacity (compressor, dryer, electrical, storage, etc.), canopy, pricing signage.  
Oxnard: Install additional slow-fill stations, trenching, canopy, and pricing signage.  
Canoga: Install additional slow-fill stations and trenching.  
Crenshaw: Equipment replacement (compressor, dryer, system controls, etc).  
Pasadena: Install additional slow-fill stations and trenching.  
San Bernardino: Equipment replacement (compressor, dryer, system controls, etc).  
Santa Monica: Install additional slow-fill stations and trenching.  
Yukon: Install secondary compressor.

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**SoCalGas Response 3:-Continued**

b. Costs vary from station to station based on specific station scope of work such as paving requirements, dispenser upgrades, compressor upgrades, electrical panel requirements, etc. Please see response 3a for a listing of upgrades by site. Additionally, please see confidential attachment “ORA-SCG-043-LMW-Data CONFIDENTIAL Q1i” originally provided to ORA in response to ORA-SCG-043-LMW, and also included with this response.

c. No, all heavy-duty vehicles have the same requirements. Stations are designed to meet the need of all heavy-duty vehicles.

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4. In SoCalGas' November 13, 2017 comments on the Draft 2017 IPER (available at [http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-01/TN221758\\_20171113T165037\\_Southern\\_California\\_Gas\\_Company\\_Comments\\_SoCalGas\\_Comments\\_on\\_t.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-01/TN221758_20171113T165037_Southern_California_Gas_Company_Comments_SoCalGas_Comments_on_t.pdf)), SoCalGas cites to a report prepared by Navigant Consulting, Inc. for SoCalGas with the following citation: “‘Strategy and Impact Evaluation of Zero-Net-Energy Regulations on Gas-Fired Appliances.’ Report prepared for Southern California Gas Company. March 7, 2017.”
- a. Were the costs associated with the preparation of the above-referenced report borne by SoCalGas shareholders?
  - b. If SoCalGas sought or intends to seek rate recovery for the cost of the above-referenced report:
    - i. Please identify the total amount SoCalGas has sought or intends to seek from ratepayers for the preparation of this report.
    - ii. Please identify the section of SoCalGas testimony that includes this expense.
    - iii. Please provide a copy of the Navigant report.
    - iv. Please provide the basis upon which SoCalGas believes these costs should be borne by ratepayers.

**SoCalGas Response 4:**

- a. No.
- b.
  - i. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of the pending proceeding. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas is not seeking rate recovery for this donation. SoCalGas' TY2019 seeks rate recovery for expenses forecasted for 2019-2021. In the TY2016, the Commission authorized a revenue requirement for the SoCalGas RD&D program. Preparation of this report was funded through the RD&D one-way balancing account as authorized in the 2016 GRC decision.
  - ii. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of the pending proceeding. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: Exhibit 185 SCG 13R Jeff Reed Revised Testimony at pages JGR 12-13.

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**SoCalGas Response 4 Continued:**

- iii. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of the pending proceeding.
- iv. See objection and response to Question 4b.ii above..

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5. In response to the attached Data Request in A.15-09-013, SoCalGas stated that, as of March 2017, it had no procurement contracts for renewable natural gas and provided information on the renewable natural gas potential in SDG&E service territory.
- a. As of March 2018, does SoCalGas have any contracts for renewable natural gas? If yes, please identify.
  - b. Please provide all analysis of the biogas potential by type and source in SoCalGas service territory in a manner similar to attached response provided for SDG&E service territory.
  - c. What is the annual amount of natural gas consumed by the existing fleet of SoCalGas CNG vehicles?
  - d. What is the minimum amount of daily gas throughput needed to operate the SoCalGas system? If not available for the entire SoCalGas system, please provide amount of gas needed to maintain minimum operating pressure for the SoCalGas backbone transmission system).

**SoCalGas Response 5:**

- a. SoCalGas currently does not procure any RNG. SoCalGas transports RNG, which is sold by the commodity owner to an end-user.
- b. Please see the file Biogas\_Potential\_SoCalGas\_Service\_Territory\_April\_2018.pdf included with the response to this data request.
- c. SoCalGas Fleet vehicles used approximately 782,000 gasoline gallon equivalents (GGEs) of CNG in 2017.
- d. The amount of daily gas supplies must be equal to the daily customer demand, and it changes on a daily basis. Gas supplies include flowing pipeline supplies, local California production, and storage withdrawal. Please refer to SoCalGas' electronic bulletin board ENVOY® at <https://scgenvoy.sempra.com> for archived daily operation and Operational Flow Order (OFO) data.

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6. Response to Question 23(b) of Sierra Club/UCS-SoCalGas-02 identified the Point Loma Wastewater Treatment Plant and the CR&R Pipeline Project as the renewable natural gas projects SoCalGas is aware of that generate biogas available for sale to third parties.
- a. Are these projects located in SoCalGas service territory? If yes, please describe SoCalGas' involvement in the development of each project.
  - b. What is the total volume of gas sold or intended to be sold for each project?

**SoCalGas Response 6:**

- a. CR&R is located within SoCalGas' service territory. SoCaGas' involvement with this project was primarily related to the interconnection to the gas utility pipeline. Point Loma Wastewater Treatment Plant is within SDG&E's service territory. SDG&E's gas Rule 39 interconnections are managed by SoCalGas. As such, SoCalGas' involvement with this project was primarily related to the interconnection to the gas utility pipeline.
- b. SoCalGas objects to this question on the grounds that it seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of this GRC proceeding.



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7. Page GOM-viii of Ex. SCG-04-R states that “System expansion is performed mainly under SoCalGas’ obligation to provide service to new customers.”
- a. What does “mainly” refer to in this sentence? (E.g. when is system expansion performed for a reason other than to provide service to new customers).
  - b. Please identify the authority supporting the statement that SoCalGas has an “obligation to provide service to new customers.”

**SoCalGas Response 7:**

- a. Most pressure betterment projects are done to meet the demand of system expansion, that results from the growth in new customers. This is because new customers add natural gas load and a need to extend and/or upgrade pipelines to new developments. However, when existing customers upgrade their facilities, it can add to the overall natural gas load demand. When the existing gas infrastructure is unable to supply the new level of demand, pressure betterment is required, as stated in SCG-04-R page GOM-98 lines 17-18. An example of incremental load includes an existing customer, such as a sanitation district operator, that decides to change the operation of their trucks from diesel fuel to natural gas.
- b. SoCalGas objects to this request on the grounds that it seeks information that is beyond the scope of permissible discovery contemplated by Rule 10.1 of the Rules of Practice and Procedure of the California Public Utilities Commission, as it seeks legal conclusions, rather than the production of evidence of a factual matter. SoCalGas further objects to this question to the extent it requires SoCalGas to search its files for matters of public record, including in state and federal codes and proceedings (regulations, decisions, orders, etc.). This information is available equally to Sierra Club/UCS. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Please refer to CPUC Rule No. 21 Section 2.a, CPCU Rule No. 02 Section M, and California Code, Public Utilities Code - PUC § 451 in regard to the supporting authority obligating SCG to provide service to new customers. The links to each rule and code are provided below:

Rule No. 21 – <https://www.socalgas.com/regulatory/tariffs/tm2/pdf/21.pdf>

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**SoCalGas Response 7:-Continued**

Rule No. 02 – <https://www.socalgas.com/regulatory/tariffs/tm2/pdf/02.pdf>

California Code, Public Utilities Code - PUC § 451 -  
[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PUC&sectionNum=451](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=451).

In particular, SoCalGas relied on the following language from the California Code, Public Utilities Code, PUC § 451, “Every public utility shall furnish and maintain such adequate, efficient, just and reasonable service...as are necessary to promote the safety, health, comfort and convenience of its patrons...”

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8. Page GOM-97:6-8 of Ex. SCG-04-R states that “Pressure Betterment projects are performed in areas where there is insufficient capacity or pressure to meet load growth.” Lines 16-21 state that “local region engineers identify specific pressure betterment projects and the estimated timing in which the projects will need to be constructed.”
- a. Please identify the specific pressure betterment projects SoCalGas has identified and supporting documentation for the need for each project.
  - b. To what extent has SoCalGas assessed alternatives to a pressure betterment project, such as targeted efficiency or end-use electrification, to meet projected load growth.

**SoCalGas Response 8:**

- a. As mentioned on page 28 of SCG-04-CWP, SoCalGas used a historical five-year (2012 through 2016) average of recorded Pressure Betterment expenditures to forecast the labor and non-labor cost requirements for the years 2017 through 2019. The historical five-year average methodology is the best forecast indicator because it takes into account the complexities in identifying and constructing specific pressure betterment projects. The attached file UCS-SCG-004-Q8.a provides a summary of pressure betterment projects completed in 2017 as well as projects planned for 2018 and 2019. New projects are continuously identified as new load is added to the system or as supply conditions are evaluated and system reliability concerns are addressed. Furthermore, projects can at times be delayed due to permitting, environmental requirements or right-of-way issues, therefore the list provided is based on the information known at this time.
- b. SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and outside the scope of the cited testimony. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas does not consider targeted efficiency or end use electrification when performing pressure betterment projects. By the time a pressure betterment is identified as necessary, the need can be so great that any targeted efficiency program will not help the system or provide the service the customers demand.

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9. Response to Question 23(a) of Sierra Club/UCS-SoCalGas-02 states that FTE information for the Renewable Gas Customer Outreach group will be available in Mid-March 2018.
- a. Please identify the number of FTEs for the Renewable Gas Customer Outreach group in 2017.
  - b. Please confirm that the number of FTEs in the Renewable Gas Customer Outreach group in 2016 was 3.5 (see page 61 of SCG-20-WP). If this number is incorrect, please identify the number of FTEs in 2016.
  - c. Please identify all instances in 2016 where the existing Renewable Natural Gas Outreach Group “directly assist[ed] existing, new and potential customers in .... Implementing renewable gas solutions.” (Exh. SCG-20 p. ASC-48:3-6).

**SoCalGas Response 9:**

- a. There were 2.5 GRC funded FTEs in the Renewable Gas Customer Outreach group in 2017.
- b. In reviewing the response to question 23(a) of Sierra Club-UCS-SCG-002, errors were discovered in the calculation of the FTEs listed in Exhibit SCG-20-WP (pages 61, 62, and 65). The table below provides the updated values. There were 2.8 GRC funded FTEs in the Renewable Gas Customer Outreach group in 2016. These corrections will be made at the next available opportunity.

Adjusted-Recorded FTEs				
2012	2013	2014	2015	2016
1.5	0.9	3.2	3.5	2.8

- c. SoCalGas did not track all 2016 outreach instances. However, as one example of the 2016 outreach activities, over 170 attendees were present at the 2016 SoCalGas Renewable Gas Workshop as described in Exhibit SCG-20-R p. ASC-47:11-13.

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Response to Question 23(c) of Sierra Club/UCS-SoCalGas-02 states that “Many county owned landfill facilities (located within SoCalGas’ service territory) have issued solicitations to the market seeking proposals to utilize their landfill gas (which is currently being flared).”

- a. Please identify the landfill facilities in SoCalGas service territory that have issued the above-referenced solicitations.
- b. For each identified solicitation, please identify if the captured gas is intended for on-site energy use or would be injected into the SoCalGas system.

**SoCalGas Response 10:**

- a. SoCalGas is aware of the following public solicitations related to Response 23(c) of Sierra Club-UCS-SCG-002:
  1. County of San Bernardino: Request for Proposal - Extracted Landfill Gas to Energy Projects at Various Landfill Sites in San Bernardino County (Bid Number PWG117-SOLID-2527).
  2. Orange County Waste and Recycling - Energy Redevelopment Project at the Coyote Canyon Landfill (Bid Number 299-009065-ID).
- b. The solicitations provided in the above response are exploring how to best utilize landfill gas, including the option for injection into the natural gas transportation system.

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11. Page ASC-41:3-8 of Exh. SCG-20 states that “renewable natural gas used for transportation significantly reduces greenhouse gas emissions beyond the benefits of traditional natural gas....Heavy-duty natural gas trucks equipped with ‘near zero’ engines and fueled by renewable natural gas can provide enhanced GHG emission reductions...”
- a. Has SoCalGas studied the emissions benefits of using biomethane to generate electricity for electric vehicles rather than for use as a fuel for CNG vehicles? If yes, please provide this analysis.

**SoCalGas Response 11:**

- a. SoCalGas objects to this question on the grounds that it seeks the production of information that is outside the scope of this proceeding and neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence within the scope of this GRC proceeding.

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12. Page LLA-5:5-7 of Exh. SCG-21 states that “As demand for RG as a transportation fuel increases, it will attract additional supplies to the region, which can then be used to decarbonize natural gas end uses and homes.”
- a. Please provide all support for the statement that increased demand for RG as a transportation fuel “will attract additional supplies to the region, which can then be used to decarbonize end uses and homes.”

**SoCalGas Response 12:**

As discussed on pages LLA-4 and 5, CARB’s Short-Lived Climate Pollutant (SLCP) is an important state plan to reduce methane emissions from state sources by capturing and utilizing organic sources of methane. CARB is in the early stages of developing policies to support the objectives of the SLCP to reduce emissions by 40% by 2030. One of the early concepts is to capture organic sources of methane and utilize in the transportation sector. While CARB’s Low Carbon Fuel Standard provides financial incentives to support the development of renewable gas, CARB has acknowledged that more needs to be done to develop markets for renewable gas. SoCalGas continues to work with CARB on financial mechanisms to support long-term development of renewable gas for use in the transportation sector and beyond.

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13. Question 5(b) of Sierra Club/UCS-SoCalGas-02 sought “all communications from January 1, 2017 to the present between P&ES and the Regulatory Affairs and State Government Affairs groups regarding the “policy guidance and analysis on proposed regulation and legislation” referred to in LLA-25:14-15. In its response SoCalGas objected in part due “to the extent it seeks the production of documents protected by the attorney client privilege and work product doctrine.”
- a. Please identify the name and title of each employee in the P&ES group. For each employee, indicate whether that employee is licensed to practice law in the State of California and if so, whether the employee is an active member in good standing with the California Bar. For each employee that is in good standing with the California Bar, please provide the job description for his/her position.

**SoCalGas Response 13:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the subject matter involved in the pending proceeding and therefore, the intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding. SoCalGas appropriately preserved all of its objections (on grounds including relevancy, overbreadth and protected privileged communications) to Sierra Club-UCS-SoCalGas-02 Question 5(b).



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14. Page LLA-16:7-8 of Exh. SCG-21 states that “[t]he R&D program cost forecast for TY 2019 is driven by the need to develop and deploy technologies that: (1) enhance system safety and reliability; and (2) cost effectively meet increasingly stringent environmental requirements.”
- a. Does SoCalGas currently collect a surcharge on natural gas consumption to fund, among other things, public interest research and development (“R&D”) under AB 1002 (Pub. Utilities Code Sec. 890)? If yes, please answer the following
    - i. Please indicate the total amount SoCalGas collected in 2015, 2016 and 2017 under this surcharge.
    - ii. Of the total collected, please indicate the amount dedicated to public interest R&D in 2015, 2016, and 2017.
    - iii. It is SoCalGas’ understanding that funding for public interest R&D collected from the surcharge on natural gas consumption is administered by the California Energy Commission (“CEC”)? If yes, does SoCalGas have the opportunity to provide feedback on how this funding is administered.

**SoCalGas Response 14:**

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and therefore, the burden and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: Amounts, if any collected as a Public Purpose Program charge, are outside of the scope of the GRC.

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15. The attached SoCalGas press statement dated February 8, 2017 states that “Consistent with the commitment we made last year, SoCalGas has agreed to fund AQMD’s health study.”
- a. Is SoCalGas seeking cost recovery for the above referenced health-study? If so, please indicate the applicable section of testimony where costs of the health study are captured.

**SoCalGas Response 15:**

- a. SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the information sought by this request is neither relevant to the scope of the subject matter involved in the pending proceeding nor likely to lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: The above-referenced AQMD health study is outside the scope of the GRC.

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16. In response to Question 7 of Sierra Club/UCS-SoCalGas-02, SoCalGas identified the GHG reduction plans and energy reduction plans it has commented on, but did not provide these comments on the grounds that SoCalGas “does not track all comments to local governments, and to the extent it provides written comments, they are a matter of public record and equally available to Sierra Club/UCS.”

- a. Is it SoCalGas’ position that it is entitled to rate recovery for the costs related to the letters identified in response to Question 7(a)? If yes, please provide the specific comment letters submitted by SoCalGas identified in response to Question 7(a). Please note that unlike comment letters submitted to state agency proceedings at the CEC or ARB, these comments letters are not readily accessible on-line. Sierra Club does not believe it is appropriate to require it to file a public records act to each public entity that may have these documents in order to review their contents.

**SoCalGas Response 16:**

- a. Yes. Please see the attachments to this request:
  - ACC-OC Climate Action Plan Comment Letter.pdf
  - CityofIndioGP\_SoCalGas\_CommentLetter.pdf
  - Redlands General Plan Update Comment Letter.pdf
  - San Bernardino REC Element Comment Letter.pdf
  - SCG Comments\_Pasadena Draft CAP 1-22-18.pdf
  - SoCalGas Comments – SCAG 2016 RTP SCS.pdf
  - SoCalGas\_CityofLaCanadaFlintridgeCAP\_CommentLetter.pdf