



January 30, 2020

Via Electronic Mail and On-Line Filing

Legal Division Public Records Office
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
public.records@cpuc.ca.gov

RE: Public Records Act Request

Pursuant to the Public Records Act (Government Code section 6250 *et seq.*), Earthjustice requests that the California Public Utilities Commission (“CPUC”) make available for review all of the following documents:

- 1) Southern California Gas Company (“SoCalGas”) responses to data requests issued from June 1, 2019 to the present by the Public Advocates Office (“PAO”) related to SoCalGas efforts to oppose fuel switching from natural gas to electric ends uses in the building and transportation sectors. Earthjustice is specifically interested in SoCalGas responses to PAO data requests that have been conducted outside the scope of a formal CPUC proceeding and have not otherwise been filed or served in a formal CPUC proceeding such as R.19-01-011 (Building Decarbonization proceeding) and R.13-11-005 (Energy Efficiency proceeding). The subject matter of the data request responses Earthjustice seeks includes, but is not limited to:
 - Contracts, payments and communications between SoCalGas and third party consultants including Imprenta and Marathon Communications;
 - Communications, financial payments or provision of other types of assistance (e.g. development of talking points, draft documents) from SoCalGas or its consultants to local elected officials, community groups or business associations related to proposed electrification policies by the Ports of LA and Long Beach;
 - Communications, financial payments or provision of other types of assistance (e.g. talking points, draft documents) from SoCalGas or its consultants to local elected officials, community groups, or business associations related to “Balanced Energy Resolutions” or any other measures directed at retaining use of gas appliances in buildings in lieu of electric alternatives;

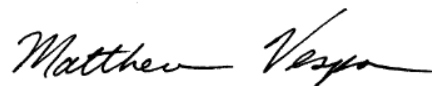
- Internal SoCalGas documents related to opposition to policies facilitating fuel switching from natural gas to electric end uses;
 - SoCalGas or its consultants involvement with Californians for Balanced Energy Solutions, also referred to as C4BES, or any other entity SoCalGas has had a role in establishing.
 - SoCalGas internal billing practices for the above referenced activities (e.g. shareholder or ratepayer expense, and if a ratepayer expense, how classified).
- 2) Any cover letters or other supplemental materials included with any SoCalGas response to PAO data requests responsive to this Public Records Act request.
 - 3) To the extent SoCalGas had designated as confidential any part of its responses to the data requests responsive to this Public Records Act request, the confidentiality declarations and any material SoCalGas provided to PAO is support of its confidentiality designations.

The term “documents” includes, but is not limited to, letters, memoranda, facsimile and phone logs, electronic mail and data, memoranda to files, and any other correspondence sent or received, or other information that would be an agency record subject to the requirements of the PRA when maintained by an agency in any format, including an electronic format.

To the extent this response is voluminous, Earthjustice is amendable to a staggered production timeframe. In addition, wherever possible, please provide the requested documents in electronic format.

If you have any questions concerning this request, please contact me at (415) 217-2123. Thank you for your assistance with this matter.

Sincerely,



Matthew Vespa
Staff Attorney
Earthjustice
50 California St., Suite 500
mvespa@earthjustice.org
(415) 217-2123