

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES SC-SCG-2019-08)
Date Received: November 20, 2019
Date Submitted: December 6, 2019

QUESTION 1:

For each local municipality (103 total) listed on <https://www.socalgas.com/vision/balanced-energy-resolutions>, please identify the total costs to SoCalGas associated with communications between the municipality and SoCalGas' Regional Public Affairs (RPA) department, since January 1, 2018. This should include, but not be limited to, costs associated with the following types of activities:

- a. In person meetings (public and private)
- b. Signed letters from the Company
- c. Writing or furnishing a draft resolution
- d. Email communication with city officials

RESPONSE 1:

SoCalGas objects to this question as overbroad and unduly burdensome, as well as vague with respect to the phrases "total costs to SoCalGas associated with" and "costs associated with." Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas did not track the costs associated with communications between Regional Public Affairs employees and municipalities. The Regional Public Affairs employees who communicated with the municipalities are all salaried employees.

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QUESTION 2:

In attachment A, please disaggregate the total costs identified in question 1. Include the cost center, IO, and general ledger (G/L) account and designation of whether that account was originally recorded to a ratepayer or shareholder funded account. Costs should be broken down by year, municipality, and into the categories listed below:

- a. Employee Labor
- b. Employee Expenses
- c. Materials Cost
- d. Other Costs

RESPONSE 2:

SoCalGas objects to this question as overbroad and unduly burdensome, as well as vague with respect to the phrases “total costs to SoCalGas associated with” and “costs associated with” in question 1. It would be unduly burdensome for SoCalGas to create new records in the form requested. Subject to and without waiving its objection, SoCalGas responds as follows:

See response to question 1. SoCalGas does not have an available break down of disaggregated costs associated with balanced energy resolution communications between Regional Public Affairs employees and municipalities.

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QUESTION 3:

Provide all draft/model balanced energy resolutions documents circulated by SoCalGas/Sempra.

RESPONSE 3:

SoCalGas objects to this question as overbroad. Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas' Regional Public Affairs office circulated one draft resolution, which is attached and titled "Model Resolution."

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QUESTION 4:

For each document identified in question 3, state

- a. The date(s) the identified document was sent.
- b. The organization to which the document was sent and, if sent to a public official(s), the name(s) and title(s) of that official.
- c. The business department from which the document originated.

RESPONSE 4:

SoCalGas objects to this question as overbroad and unduly burdensome. Subject to and without waiving its objection, SoCalGas responds as follows:

SoCalGas' Regional Public Affairs department circulated one balanced energy resolution, which originated in that department. The Regional Public Affairs employees did not maintain logs with dates, organizations and public officials contacted for the various communications in question. Accordingly, the requested information would be unduly burdensome in performing a search of SoCalGas' records.

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QUESTION 5:

Please refer to the banner ad which reads “Natural Gas is Affordable, Clean and Renewable” previously sent as “Data Request - CalAdvocates-SC-SCG-2019-07 - Attachment A.”

- a. Please identify each outlet (e.g., magazine, website, newspaper, social media site, or other publication) where SoCalGas (or its agents) has placed this advertisement.
- b. For each outlet where SoCalGas (or its agents) has placed this advertisement, identify the total costs to SoCalGas.
- c. Of the costs identified in subpart (b), how much was charged to a ratepayer-funded account?
- d. Since January 1, 2018, has SoCalGas (or its agents) paid for other advertisements that include the claim that natural gas is “renewable”? If so, for each such advertisement, please respond to subparts (a)-(c) of this question.
- e. Please identifying the percent of total gas supplies procured by SoCalGas for its core customers that came from renewable sources in:
 - i. 2017
 - ii. 2018
 - iii. 2019 (quarters 1 to 3)

RESPONSE 5:

- a. The banner in Attachment A was not part of a marketing or advertisement placement. SoCalGas’ internal communications group created the banner as a part of the company’s communications activity. The objective of the banner is to speak to who SoCalGas is as a natural gas company and the company’s vision. SoCalGas’ Community Relations group provided the banner to Cal Matters as a part of a charitable sponsorship. Within the scope of that sponsorship, Cal Matters used the banner in its email newsletter.
- b. SoCalGas has not placed the banner for advertisement. SoCalGas provided \$14,000 in charitable sponsorship to Cal Matters.

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- c. There were no costs charged to a ratepayer-funded account. The charitable sponsorship to Cal Matters was paid through a 100% shareholder-funded account and cost center.

- d. SoCalGas objects to this question as overbroad and unduly burdensome. The request is not sufficiently tailored to apprise the company of what is being sought. It is not possible for SoCalGas to quantify the number of paid advertisements that use the word “renewable” because the company uses the word across multiple communication channels, including social media advertisements, billboards, digital banners, print advertisements, signage, t-shirts and pens to name a few. To determine all advertisements where the word renewable potentially appears, identify the outlets where the advertisement was placed, and then trace the associated costs would require the SoCalGas to undertake a process which is unreasonably time-consuming and burdensome.

- e. Please identifying (sic) the percent of total gas supplies procured by SoCalGas for its core customers that came from renewable sources in:
 - i. 0%
 - ii. 0%
 - iii. Q1 0%
Q2 0.1%
Q3 0.1%

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QUESTION 6:

Multiple Sempra online news releases sourced from SoCalGas end with a section titled “About SoCalGas” which states that “SoCalGas delivers affordable, reliable, clean and increasingly renewable natural gas service to 21.8 million customers...”¹ Please state the basis for the statement that SoCalGas provides “increasingly renewable natural gas service to 21.8 million customers.”

RESPONSE 6:

The Commission approved SoCalGas Advice Letter (AL) No. 5295 July 5, 2018, “Balancing Account and Rate Schedule Modifications Supporting a Voluntary Renewable Natural Gas Procurement Pilot” which authorized SoCalGas to purchase renewable natural gas to meet demand for core customer and Company fleet natural gas vehicles (NGV) taking service at both SoCalGas and SDG&E compressed natural gas (CNG) fill stations. Procurement for CNG transportation load related to the pilot program commenced April 1, 2019. In addition, SoCalGas has interconnected renewable gas projects and will be interconnecting additional renewable gas projects who deliver renewable gas through SoCalGas’ pipeline system. According to the Air Resources Board, in 2018 there was approximately 14.3 Bcf of R-CNG consumed statewide. Prorating this amount between SoCalGas and Pacific Gas & Electric (4:1), SoCalGas had roughly 11.5 Bcf of RNG on the company’s system in 2018.