

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application For Rehearing of Resolution
ALJ-391.

Application 20-12-011

**PUBLIC ADVOCATES OFFICE MOTION FOR AN EXPEDITED RULING
(1) ORDERING SOUTHERN CALIFORNIA GAS COMPANY TO PRODUCE
CONFIDENTIAL DECLARATIONS NO LATER THAN JANUARY 6, 2021 AND FOR
AN EXTENSION TO RESPOND TO THE UTILITY'S APPLICATION FOR
REHEARING OR IN THE ALTERNATIVE TO GRANT AN ADVERSE
PRESUMPTION AGAINST THE UTILITY OR FOR THE COMMISSION TO
PROVIDE THE CONFIDENTIAL DECLARATIONS AND
(2) TO SHORTEN TIME TO RESPOND TO MOTION**

I. REQUEST

Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this motion requesting an order requiring Southern California Gas Company (SoCalGas) to produce to Cal Advocates by no later than January 6, 2020, the confidential versions of Declarations 4, 5, and 6 (confidential declarations) that were attached to the utility's December 2, 2019 Motion for Reconsideration/Appeal of the November 1, 2019 Administrative Law Judge ruling.¹ Cal Advocates also requests an additional two business days' extension to file its Response to SoCalGas' Rehearing Application in this docket (Response), from January 11, 2021 to January 13, 2021 so that it may incorporate any findings from the confidential declarations into its Response. To the extent production of the confidential declarations is delayed beyond January 6, 2021, Cal Advocates requests an extension to file its Response five business days after production of the confidential declarations.

Alternatively, in lieu of ordering SoCalGas to provide the confidential declarations to Cal Advocates, Cal Advocates requests that the Commission either impose an adverse inference on

¹ Those declarations are part of SoCalGas' showing that it would be damaged by disclosure of certain discovery to Cal Advocates. The declarants claim that making their identities public would dissuade them from communicating or contracting with SoCalGas.

SoCalGas' claims that the confidential declarations are actually confidential, or provide the confidential declarations in the Commission's possession to Cal Advocates.

Lastly, Cal Advocates requests that this motion be treated in an expedited manner and that the Commission shorten parties' response time to January 4, 2021.

II. DISCUSSION

It has recently come to Cal Advocates' attention that it cannot prepare its Response to SoCalGas' Rehearing Application in this docket (Response) without access to the confidential declarations that SoCalGas has offered in support of its First Amendment association claims. This is because it is possible that the declarants' or their employers' identities may not, in fact, be confidential.

This fact is relevant because a showing that the declarants' or their employers' identities are already public would be dispositive to any SoCalGas First Amendment claim. This is because SoCalGas' First Amendment rights cannot be infringed by requiring it to disclose information that is already publicly available. Such a dispositive resolution of SoCalGas' First Amendment claims would significantly limit the Commission's need to address SoCalGas' rehearing arguments, and reduce the likelihood of any SoCalGas appeal to the courts.

This week, Cal Advocates learned that the identities of certain consultants that SoCalGas has variously claimed are confidential – including, without limitation, Marathon Communications (Marathon) and Imprenta Communications Group (Imprenta) – have been publicly available since before the declarations were signed. Indeed, the identities of these consultants, and many others, were provided in forms filed with the Fair Political Practices Commission (FPPC) in 2018 and 2019, and are publicly available on the FPPC's website.² Notwithstanding these public disclosures, SoCalGas claimed the Marathon and Imprenta consultants' identities were confidential long after the FPPC filings were made, and it is possible that the declarant's identities – which SoCalGas also claims are confidential – are similarly publicly available. However, this cannot be established without access to the confidential versions of the declarations.

² See Attachment A - Sempra Energy and Affiliates Period 4/1/2019-6/30/2019 Forms 635 and 640 listing Marathon Communications at 8-9, and Attachment B - Sempra Energy and Affiliates Period 1/1/2018-3/31/2018 Forms 635 and 640 listing Imprenta Communications Group at 9.

Only by reviewing the confidential declarations – or at least knowing the names of the declarants and the entities they work for – can Cal Advocates determine whether those declarant’s identities have also been made public – like those of Marathon and Imprint³ - thereby rendering moot SoCalGas’ reliance on those declarations to assert a First Amendment right of association.

It would be more than appropriate for the Commission to order SoCalGas to provide the confidential declarations to Cal Advocates within even twenty four hours. They are readily available to the utility and are over a year late. SoCalGas should have provided them to Cal Advocates when the utility served its December 2, 2019 Motion for Reconsideration/Appeal. SoCalGas provided the confidential declarations to the Commission and assigned Administrative Law Judge at that time, but intentionally and improperly withheld them from Cal Advocates based on claims that the consultant’s names were protected by the First Amendment right to association and unsubstantiated fears that Cal Advocates would publicly disclose the names of the consultants. The utility has refused to provide the confidential declarations to Cal Advocates for the past year, despite Cal Advocates’ repeated efforts to obtain them, including a July 9, 2020 Motion to Compel, which was finally acted on this month by Resolution ALJ-391.

Resolution ALJ-391 agreed that Cal Advocates is entitled to the confidential declarations,⁴ and requires SoCalGas to provide them to Cal Advocates no later than 30 days after the effective date of that Resolution – which would be January 20.⁵ However, for the reasons described above, it is now evident that the confidential declarations should be provided to Cal Advocates as soon as possible so that it may address their impact in its Response.

III. CONCLUSION

In order to facilitate review of SoCalGas’ Rehearing Application, the Commission should order SoCalGas to provide the confidential declarations to Cal Advocates as soon as practicable

³ Note that it is even possible that that some of the declarants may actually be employees of Marathon or Imprinta.

⁴ Resolution ALJ-391 finds: “[T]his Resolution grants SoCalGas’ December 2, 2019 motion for leave to file under seal confidential versions of certain declarations but, in doing so, confirms that SoCalGas must provide access to the unredacted versions of the confidential declarations to the Commission, including its staff, such as Cal Advocates, under existing protections. See also Ordering Paragraph 2.

⁵ SoCalGas filed a motion on December 22, 2020 to indefinitely stay its obligation to provide the declarations and other information to Cal Advocates.

and in no event later than January 6, 2021. Because the January 6, 2021 time frame proposed here provides Cal Advocates only three business days to incorporate any findings into its Response – which is currently due Monday, January 11, 2021 - Cal Advocates also requests a two-business day extension to file its Response on January 13, 2021.

As an alternative to providing the confidential declarations to Cal Advocates, the Commission should find that SoCalGas' refusal to provide the information to Cal Advocates for over a year is grounds for a finding of adverse inference under the law. In such a situation, a court finds that if the information were produced, it would be adverse to the defendant. Applied here, the adverse inference would be that the confidential declarations are not, in fact confidential, because the identity of the declarants or their employers is, or is required to be,⁶ publicly available.

To the extent neither of these proposals are acceptable, Cal Advocates notes that the Commission and its staff are in possession of the confidential declarations, and could make them available to Cal Advocates at their discretion.

Finally, given Cal Advocates need for the information as soon as practicable, it requests expedited treatment of this motion and a shortened response date of January 4, 2021.

Respectfully submitted,

/s/ TRACI BONE

Traci Bone
Attorney for

The Public Advocates Office
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Telephone: (415) 703-2048
Email: Traci.Bone@cpuc.ca.gov

December 30, 2020

⁶ It is possible that SoCalGas is withholding information it is obligated to disclose in FPPC filings by mischaracterizing its consultants' activities so that information that is required to be made public, has not, in fact, been made public.

ATTACHMENT A

Sempra Energy and Affiliates Period 4/1/2019-6/30/2019

FPPC Forms 635 and 640

REPORT OF LOBBYIST EMPLOYER

(Government Code Section 86116)

1/10

or

REPORT OF LOBBYING COALITION

(2 Cal. Code of Regs. Section 18616.4)

**FORM 635
1993**

IMPORTANT: Lobbying Coalitions must attach a completed Form 635-C to this Report.

REPORT COVERS PERIOD FROM 04/01/2019 THROUGH 06/30/2019

CUMULATIVE PERIOD BEGINNING 01/01/2019

FOR OFFICIAL USE ONLY

A

B

TYPE OR PRINT IN INK

For information required to be provided to you pursuant to the Information Practices Act of 1977, see [Information Manual on Lobbying Disclosure Provisions of the Political Reform Act](#).

NAME OF FILER:

Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(Zip Code)

TELEPHONE NUMBER:

San Diego

CA

92101

PART I - LEGISLATIVE OR STATE AGENCY ADMINISTRATIVE ACTIONS ACTIVELY LOBBIED DURING THE PERIOD

(See instructions on reverse.)

See attached TEXT

If more space is needed, check box and attach continuation sheets.

SUMMARY OF PAYMENTS THIS PERIOD

A. Total Payments to In-House Employee Lobbyists (Part III, Section A, Column 1)	\$	<u>100414.23</u>
B. Total Payments to Lobbying Firms (Part III, Section B, Column 4)	\$	<u>267875.00</u>
C. Total Activity Expenses (Part III, Section C)	\$	<u>6946.66</u>
D. Total Other Payments to Influence (Part III, Section D)	\$	<u>163290.33</u>

GRAND TOTAL (A + B + C + D above) \$ 538526.22

E. Total Payments in Connection with PUC Activities (Part III, Section E) \$ 23430.06

F. Campaign Contributions: Part IV completed and attached No campaign contributions made this period

VERIFICATION

I have used all reasonable diligence in preparing this Report. I have reviewed the Report and to the best of my knowledge the information contained herein and in the attached schedules is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on (Date)
07/31/2019

At (City and State)
San Diego, CA

By (Signature of Employer or Responsible Officer)
Mr. Dennis Arriola

Name of Employer or Responsible Officer (Type or Print)
Mr. Dennis Arriola

Title
EVP and Group President

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART II - PARTNERS, OWNERS, AND EMPLOYEES WHOSE "LOBBYIST REPORTS" (FORM 615) ARE ATTACHED TO THIS REPORT (See instructions on reverse.)

Name and Title	Name and Title
Employee Israel Salas Government Affairs Manager	Employee Ms. Nicolina Hernandez Government Affairs Manager
Employee Ms. Lourdes Jimenez Government Affairs Manager	

If more space is needed, check box and attach continuation sheets.

PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

A. PAYMENTS TO IN-HOUSE EMPLOYEE LOBBYISTS (See instructions on reverse. Also enter the Amount This Period (Column 1) on Line A of the Summary of Payments section on page 1.)	(1) Amount This Period	(2) Cumulative Total To Date
		\$ 100414.23

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)					
Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
AJW, Inc. Arlington VA 22201	0.00	0.00	0.00	0.00	10000.00
California Strategies & Advocacy LLC Sacramento CA 95814	30000.00	0.00	0.00	30000.00	30000.00
Campbell Strategy & Advocacy, LLC Sacramento CA 95814	18000.00	0.00	0.00	18000.00	47000.00
CAPITOL STRATEGIES GROUP, INC. Sacramento CA 95814	69000.00	0.00	0.00	69000.00	81000.00
CRUZ STRATEGIES SACRAMENTO CA 95814	44000.00	0.00	0.00	44000.00	69453.84

TOTAL THIS PERIOD (Column 4)

Also enter the total of Column 4 on Line B of the Summary of Payments section on page 1.

\$ 267875.00

If more space is needed, check box and attach continuation sheets

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)				
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each	Description of Consideration	Total Amount of Activity
05/06/2019	Amourath Sacramento CA 98514	Patsy Ayala Field Rep - Senator Wilk	VISA 11.20 Meal	\$ 34.80
04/30/2019	Eurest Dining San Diego CA 92123	Janea Scott CEC Commissioner	10.00 MASTER - CARD Meal	106.30
05/09/2019	Eurest Dining San Diego CA 92123	Tony Mecham CAL Fire Unit Chief	14.95 Other Meal	1495.00
05/22/2019	Eurest Dining Los Angeles CA 90013	Lana Wong CEC Senior Analyst	25.09 Other Meal	150.56
	Eurest Dining Los Angeles CA 90013	Rod Walker CEC Consultant	25.09 Other Meal	
<input checked="" type="checkbox"/> If more space is needed, check box and attach continuation sheets.			TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.	\$ 6946.66
D. OTHER PAYMENTS TO INFLUENCE LEGISLATIVE OR ADMINISTRATIVE ACTION <input checked="" type="checkbox"/> NOTE: State and local government agencies do not complete this section. Check box and complete Attachment Form 640 instead.				
1. PAYMENTS TO LOBBYING COALITIONS (NOTE: You must attach a completed Form 630 to this Report.)			\$ 0.00	
2. OTHER PAYMENTS			\$ 163290.33	
			TOTAL SECTION D (1 + 2) Also enter the total of Section D on Line D of the Summary of Payments section on page 1.	\$ 163290.33
E. PAYMENTS IN CONNECTION WITH ADMINISTRATIVE TESTIMONY IN RATEMAKING PROCEEDINGS BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION Also, enter the total of Section E on Line E of the Summary of Payments section on page 1. (See instructions on reverse.)				\$ 23430.06

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

A. If the contributions made by you during the period covered by this report, or by a committee you sponsor, are contained in a campaign disclosure statement which is on file with the Secretary of State, report the name of the committee and its identification number, if any, below.

Name of Major Donor or Recipient Committee Which Has Filed A Campaign Disclosure Statement: Sempra Energy Identification Number if Recipient Committee: 488235

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
			\$
			\$
			\$
			\$
			\$
			\$
			\$
			\$
			\$
			\$
			\$
			\$

If more space is needed, check box and attach continuation sheets.

NOTE: Disclosure in this report does not relieve a filer of any obligation to file the campaign disclosure statements required by Gov. Code Section 84200, et seq.

PERIOD COVERED: 04/01/2019 06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)

Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
Mercury Public Affairs Sacramento CA 95814	46875.00	0.00	0.00	46875.00	67875.00
Kester/Pahos Sacramento CA 95814	60000.00	0.00	0.00	60000.00	60000.00

TOTAL THIS PERIOD (Column 4)
Also enter the total of Column 4 on Line B of the Summary of Payments section on page 1.

\$ 267875.00

PERIOD COVERED: 04/01/2019 06/30/2019NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)					
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each		Description of Consideration	Total Amount of Activity
	Eurest Dining Los Angeles CA 90013 Reference No:	Elexeious Prigett CEC Oil & Gas Advisor	\$ 25.09 Other	Meal	\$
06/25/2019	Sutter Club Sacramento CA 95814 Reference No:	Miranda Flores Legislative Director - Assemb - lymember Quirk	\$ 67.01 MASTER - CARD	Meal	\$ 5160.00
	Sutter Club Sacramento CA 95814 Reference No:	Tim Olson Senior Policy Advisor - CEC	\$ 67.01 MASTER - CARD	Meal	\$
	Sutter Club Sacramento CA 95814 Reference No:	Kielan Rathjan Executive Fellow - Governor's office of Business	\$ 67.01 MASTER - CARD	Meal	\$
	Sutter Club Sacramento CA 95814 Reference No:	Prab Sethi Grant Manager - CEC	\$ 67.01 MASTER - CARD	Meal	\$
	Sutter Club Sacramento CA 95814 Reference No:	Dan Sperling Board Member - CARB	\$ 67.01 MASTER - CARD	Meal	\$
	Sutter Club Sacramento CA 95814 Reference No:	Bill Quirk Assemblymember	\$ 67.01 MASTER - CARD	Meal	\$
	Sutter Club Sacramento CA 95814 Reference No:	Tyson Eckerle Deputy Director - Governor's office of Business	\$ 67.01 MASTER - CARD	Meal	\$
TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.					\$

PERIOD COVERED: 04/01/2019 06/30/2019NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.**C. ACTIVITY EXPENSES** (See instructions on reverse.)

Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each		Description of Consideration	Total Amount of Activity
	Sutter Club Sacramento CA 95814 Reference No:	Hassan Mohammed Contract Manager - CEC	\$ 67.01 MASTER - CARD	Meal	\$
TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.					\$ 6946.66

Attachment Form 640

(Attachment to Form 635 or Form 645)

CALIFORNIA
1993 FORM

640

8/10

PERIOD COVERED: 04/01/2019--06/30/2019

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

For Use By: A state or local government agency that qualifies as a lobbyist employer or a \$5,000 filer. Refer to the instructions on the cover page before completing this attachment.

Other Payments to Influence Legislative or Administrative Action:

1. Total payments for overhead expenses related to lobbying activity. <u>Report as a lump sum.</u>	\$ 7937.99
2. Total payments to Lobbying Coalitions. <u>Report as a lump sum.</u> (Form 630 must be attached)	\$ 0.00
3. Total payments of less than \$250 during the calendar quarter for lobbying activity (excluding overhead). <u>Report as a lump sum.</u>	\$ 2053.10
4. Total payments of more than \$250 during the calendar quarter for lobbying activity (excluding overhead). Such payments must be itemized below.	\$ 153299.24
5. Grand total of "Other Payments to Influence Legislative or Administrative Action." Also enter this total on the appropriate line of the Summary of Payments section on Page 1 of Form 635 or Form 645.	<u>\$ 163290.33</u>

Itemize below payments of \$250 or more made during the quarter for lobbying activity. Provide the name and address of the payee, the amount paid during the quarter, and the cumulative amount paid to the payee since January 1 of the biennial legislative session covered by the report.

Also itemize dues or similar payments of \$250 or more made to an organization that makes expenditures equal to 10% of its total expenditures or \$15,000 or more in a calendar quarter to influence legislative or administrative action. Provide the organization's name and address, the amount paid to the organization during the quarter, and the cumulative amount paid to the organization since January 1 of the biennial legislative session covered by the report.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1
[E] - Sempra Expenses Related to Lobbying Activities San Diego CA 92101	\$ 32597.00	\$ 77593.00
[S] - Loren Logan San Diego CA 92123	\$ 5736.36	\$ 9833.76
[S] - Rhiannon Davis San Diego CA 92123	\$ 6286.57	\$ 10434.41
Subtotal of all payments itemized above	\$ 44619.93	

If more space is needed, check box and attach continuation sheets.

Attachment Form 640

(Continuation Sheet)

CALIFORNIA
1993 FORM**640**

9/10

PERIOD COVERED: 04/01/2019--06/30/2019NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1 Biennial Legislative Session
[S] - Christopher Gilbride Los Angeles CA 90013	10825.32	21650.64
[P] - Bicker Castillo & Fairbanks Sacramento CA 95814	41343.59	41343.59
[S] - Kent Kauss Sacramento CA 95814	4709.73	7764.69
[P] - Storefront Political Media San Francisco CA 94111	28000.00	28000.00
[P] - Marathon Communications Los Angeles CA 90036	15266.75	15266.75
[S] - Scott Drury San Diego 92123	8533.92	8533.92
Subtotal of all payments itemized above	\$ 108679.31	

TEXT ANNOTATION

PAGE 1

Schedule F635

Reference No:

Assembly Bills: 25,38,56,74,111,126,157,161,178,235,281,291,491,560,660,684,745,753,784,868,900,915,961,983,1026,1039,1054,1057 - 1083,1100,1124,1143,1144,1156,1166,1195,1232,1293,1323,1328,1347,1362,1363,1371,1406,1424,1463,1516,1584,1690,1693,1751,1789,1799. Senate Bills: 44,49,70,85,130,155,167,169,182,190,199,209,210,216,247,255,290,350,457,463,515,520,524,535,548,549,550,551,561,584,597,632,660,662,676,682,766,772,774. Offices Lobbied: Governor's office, California Legislature, CARB, California Department of Forestry & Fire Protection, CalEPA, CEC, CISO, CPUC, California Resources Agency, California State Water Board.

Attachment B

Sempra Energy and Affiliates Period 1/1/208-3/31/2018

FPPC Forms 635 and 640

REPORT OF LOBBYIST EMPLOYER

(Government Code Section 86116)

1/10

or

REPORT OF LOBBYING COALITION

(2 Cal. Code of Regs. Section 18616.4)

FORM 635
1993

IMPORTANT: Lobbying Coalitions must attach a completed Form 635-C to this Report.

REPORT COVERS PERIOD FROM 01/01/2018 THROUGH 03/31/2018

CUMULATIVE PERIOD BEGINNING 01/01/2017

FOR OFFICIAL USE ONLY

A

B

TYPE OR PRINT IN INK

For information required to be provided to you pursuant to the Information Practices Act of 1977, see [Information Manual on Lobbying Disclosure Provisions of the Political Reform Act](#).

NAME OF FILER:

Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(Zip Code)

TELEPHONE NUMBER:

San Diego

CA

92101

PART I - LEGISLATIVE OR STATE AGENCY ADMINISTRATIVE ACTIONS ACTIVELY LOBBIED DURING THE PERIOD

(See instructions on reverse.)

See attached TEXT

If more space is needed, check box and attach continuation sheets.

SUMMARY OF PAYMENTS THIS PERIOD

A. Total Payments to In-House Employee Lobbyists (Part III, Section A, Column 1)	\$	<u>82913.89</u>
B. Total Payments to Lobbying Firms (Part III, Section B, Column 4)	\$	<u>103000.00</u>
C. Total Activity Expenses (Part III, Section C)	\$	<u>978.80</u>
D. Total Other Payments to Influence (Part III, Section D)	\$	<u>104743.80</u>

GRAND TOTAL (A + B + C + D above) \$ 291636.49

E. Total Payments in Connection with PUC Activities (Part III, Section E) \$ 4882.68

F. Campaign Contributions: Part IV completed and attached No campaign contributions made this period

VERIFICATION

I have used all reasonable diligence in preparing this Report. I have reviewed the Report and to the best of my knowledge the information contained herein and in the attached schedules is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on (Date)
04/30/2018

At (City and State)
San Diego, CA

By (Signature of Employer or Responsible Officer)
Mr. Dennis Arriola

Name of Employer or Responsible Officer (Type or Print)
Mr. Dennis Arriola

Title
EVP - External Affairs & South America

PERIOD COVERED: 01/01/2018 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.**PART II - PARTNERS, OWNERS, AND EMPLOYEES WHOSE "LOBBYIST REPORTS" (FORM 615) ARE ATTACHED TO THIS REPORT** (See instructions on reverse.)

Name and Title	Name and Title
Employee Israel Salas Government Affairs Manager	Employee Nicolina Hernandez Government Affairs Manager

 If more space is needed, check box and attach continuation sheets.
PART III - PAYMENTS MADE IN CONNECTION WITH LOBBYING ACTIVITIES

A. PAYMENTS TO IN-HOUSE EMPLOYEE LOBBYISTS (See instructions on reverse. Also enter the Amount This Period (Column 1) on Line A of the Summary of Payments section on page 1.)	(1) Amount This Period	(2) Cumulative Total To Date
	\$ 82913.89	\$ 605227.00

B. PAYMENTS TO LOBBYING FIRMS (Including Individual Contract Lobbyists)

Name and Address of Lobbying Firm/Independent Contractor	(1) Fees & Retainers	(2) Reimbursements of Expenses	(3) Advances or Other Payments (attach explanation)	(4) Total This Period	(5) Cumulative Total to Date
Campbell Strategy & Advocacy,LLC <u>Sacramento CA 95814</u>	34000.00	0.00	0.00	34000.00	138000.00
CAPITOL STRATEGIES GROUP,INC. <u>Sacramento CA 95814</u>	36000.00	0.00	0.00	36000.00	150000.00
FERNANDEZ GOVERNMENT SOLUTIONS,LLC <u>SACRAMENTO CA 95814</u>	0.00	0.00	0.00	0.00	103500.00
Kester/Pahos <u>Sacramento CA 95814</u>	0.00	0.00	0.00	0.00	80000.00
Mercury Public Affairs <u>Sacramento CA 95814</u>	33000.00	0.00	0.00	33000.00	159000.00

 If more space is needed, check box and attach continuation sheets

TOTAL THIS PERIOD (Column 4)
Also enter the total of Column 4 on Line B of the
Summary of Payments section on page 1.

\$ 103000.00

PERIOD COVERED: 01/01/2018 03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

C. ACTIVITY EXPENSES (See instructions on reverse.)				
Date	Name and Address of Payee	Name and Official Position of Reportable Persons and Amount Benefiting Each	Description of Consideration	Total Amount of Activity
03/13/2018	Eurest Dining San Diego CA 92117	Mark Ferron California ISO Boardmember	Other 42.56 Meal	\$ 978.80
	Eurest Dining San Diego CA 92117	Carla Peterman CPUC Commissioner	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	David Hochschild CEC Commissioner	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	Mary Nichols CARB Chair	Other 42.56 Meal	
	Eurest Dining San Diego CA 92117	Janea Scott CEC Commissioner	Other 42.56 Meal	
<input type="checkbox"/> If more space is needed, check box and attach continuation sheets.			TOTAL SECTION C (Activity Expenses) Also enter the total of Section C on Line C of the Summary of Payments section on page 1.	\$ 978.80
D. OTHER PAYMENTS TO INFLUENCE LEGISLATIVE OR ADMINISTRATIVE ACTION <input checked="" type="checkbox"/> NOTE: State and local government agencies do not complete this section. Check box and complete Attachment Form 640 instead.				
1. PAYMENTS TO LOBBYING COALITIONS (NOTE: You must attach a completed Form 630 to this Report.)			\$ 0.00	
2. OTHER PAYMENTS			\$ 0.00	
			TOTAL SECTION D (1 + 2) Also enter the total of Section D on Line D of the Summary of Payments section on page 1.	\$ 0.00
E. PAYMENTS IN CONNECTION WITH ADMINISTRATIVE TESTIMONY IN RATEMAKING PROCEEDINGS BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION Also, enter the total of Section E on Line E of the Summary of Payments section on page 1. (See instructions on reverse.)				\$ 4882.68

PERIOD COVERED: 01/01/2018 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

- A. If the contributions made by you during the period covered by this report, or by a committee you sponsor, are contained in a campaign disclosure statement which is on file with the Secretary of State, report the name of the committee and its identification number, if any, below.

Name of Major Donor or Recipient Committee Which Identification Number if
 Has Filed A Campaign Disclosure Statement: Recipient Committee: 488235
SEMPRA ENERGY AND ITS AFFILIATES: SOUTHERN CALIFORNIA GAS CO. & SAN DIEGO GAS & ELECTRIC

- B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/28/2018	Cecilia Aguilar-Curry for Assembly 2018	1392362	\$ 2600.00
03/01/2018	Dr. Richard Pan for Senate 2018	1374058	\$ 1300.00
03/01/2018	Jay Obernolte for Assembly	1392884	\$ 1000.00
03/01/2018	Friends of Frank Bigelow 2018	1392565	\$ 1400.00
03/01/2018	Friends of Frank Bigelow 2018	1392565	\$ 4400.00
03/01/2018	O'Donnell for Assembly 2018	1393597	\$ 1500.00
03/01/2018	Phillip Chen for Assembly 2018	1392379	\$ 1500.00
03/02/2018	Evan Low for Assembly 2018	1392357	\$ 200.00
03/02/2018	Patterson for Assembly 2018	1393990	\$ 2000.00
03/02/2018	Marc Steinorth for Assembly 2018	1392851	\$ 3300.00

If more space is needed, check box and attach continuation sheets.

NOTE: Disclosure in this report does not relieve a filer of any obligation to file the campaign disclosure statements required by Gov. Code Section 84200, et seq.

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
03/02/2018	Evan Low for Assembly 2018	1392357	\$ 1800.00
03/02/2018	Voepel for Assembly 2018	1393777	\$ 2400.00
03/02/2018	Jordan Cunningham for Assembly 2018	1393016	\$ 1900.00
03/02/2018	Rodriguez for Assembly 2018	1392709	\$ 1400.00
03/02/2018	Autumn Burke for Assembly 2018	1393348	\$ 4400.00
03/02/2018	Jim Cooper for Assembly 2018	1392388	\$ 4400.00
03/02/2018	Melissa Melendez for Assembly 2018	1392806	\$ 1400.00
03/26/2018	Blanca Rubio for Assembly 2018	1393364	\$ 2000.00
03/28/2018	Piquado for Assembly 2018	1401391	\$ 2500.00
01/05/2018	Lorena Gonzalez for Assembly 2018	1392494	\$ 3100.00
01/05/2018	Dr. Richard Pan for Senate 2018	1374058	\$ 2200.00
01/05/2018	Jim Wood for Assembly 2018	1392333	\$ 2500.00
01/05/2018	Marc Berman for Assembly 2018	1392758	\$ 1500.00
02/22/2018	Tim Grayson for Assembly 2018	1392593	\$ 1100.00

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/22/2018	Marc Berman for Assembly 2018	1392758	\$ 2000.00
02/26/2018	Sabrina Cervantes for Assembly 2018	1392561	\$ 1000.00
02/26/2018	Rudy Salas for Assembly 2018	1393439	\$ 4400.00
02/26/2018	Ian Calderon for Assembly 2018	1392684	\$ 1300.00
02/26/2018	Tom Daly for Assembly 2018	1393412	\$ 2900.00
02/26/2018	Anthony Rendon for Assembly 2018	1393414	\$ 4400.00
02/26/2018	Lorena Gonzalez for Assembly 2018	1392494	\$ 1300.00
02/26/2018	Andy Vidak for Senate 2018	1373825	\$ 4400.00
02/26/2018	Chris Holden for Assembly 2018	1393404	\$ 2200.00
02/26/2018	Adam Gray for Assembly 2018	1392612	\$ 4400.00
02/28/2018	Robert Hertzberg for Senate 2018	1373423	\$ 1000.00
02/28/2018	Bill Brough for State Assembly 2018	1392528	\$ 4400.00
02/28/2018	Janet Nguyen for Senate 2018	1373835	\$ 2800.00
02/28/2018	Robert Hertzberg for Senate 2018	1373423	\$ 400.00

PERIOD COVERED: 01/01/2018 - 03/31/2018NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

PART IV -- CAMPAIGN CONTRIBUTIONS MADE (Monetary and non-monetary campaign contributions of \$100 or more made to or on behalf of state candidates, elected state officers and any of their controlled committees, or committees supporting such candidates or officers must be reported in A or B below.)

B. Contributions of \$100 or more which have not been reported on a campaign disclosure statement, including contributions made by an organization's sponsored committee, must be itemized below.

Date	Name of Recipient	I.D. Number if Committee	Amount
02/28/2018	Bill Brough for State Assembly 2018	1392528	\$ 150.00
02/28/2018	Al Muratsuchi for Assembly 2018	1392662	\$ 1000.00
02/28/2018	Brian Dahle for Assembly 2018	1393369	\$ 4400.00
02/28/2018	Andreas Borgeas for Senate 2018	1394470	\$ 2500.00
02/28/2018	Lackey for Assembly 2018	1393205	\$ 1400.00

Attachment Form 640

(Attachment to Form 635 or Form 645)

CALIFORNIA
1993 FORM

640

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PERIOD COVERED: 01/01/2018--03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

For Use By: A state or local government agency that qualifies as a lobbyist employer or a \$5,000 filer. Refer to the instructions on the cover page before completing this attachment.

Other Payments to Influence Legislative or Administrative Action:

1. Total payments for overhead expenses related to lobbying activity. <u>Report as a lump sum.</u>	\$ 13626.27
2. Total payments to Lobbying Coalitions. <u>Report as a lump sum.</u> (Form 630 must be attached)	\$ 0.00
3. Total payments of less than \$250 during the calendar quarter for lobbying activity (excluding overhead). <u>Report as a lump sum.</u>	\$ 2257.27
4. Total payments of more than \$250 during the calendar quarter for lobbying activity (excluding overhead). Such payments must be itemized below.	\$ 88860.26
5. Grand total of "Other Payments to Influence Legislative or Administrative Action." Also enter this total on the appropriate line of the Summary of Payments section on Page 1 of Form 635 or Form 645.	<u>\$ 104743.80</u>

Itemize below payments of \$250 or more made during the quarter for lobbying activity. Provide the name and address of the payee, the amount paid during the quarter, and the cumulative amount paid to the payee since January 1 of the biennial legislative session covered by the report.

Also itemize dues or similar payments of \$250 or more made to an organization that makes expenditures equal to 10% of its total expenditures or \$15,000 or more in a calendar quarter to influence legislative or administrative action. Provide the organization's name and address, the amount paid to the organization during the quarter, and the cumulative amount paid to the organization since January 1 of the biennial legislative session covered by the report.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1
[E] - Sempra Expenses Related to Lobbying Activities San Diego CA 92101	\$ 53565.00	\$ 125933.00
[S] - Christopher Gilbride Los Angeles CA 90013	\$ 10086.12	\$ 36148.20
[P] - Bicker Castillo & Fairbanks Sacramento CA 95814	\$ 14762.31	\$ 136637.66
Subtotal of all payments itemized above	<u>\$ 78413.43</u>	

If more space is needed, check box and attach continuation sheets.

Attachment Form 640

(Continuation Sheet)

CALIFORNIA 1993 FORM	640
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PERIOD COVERED: 01/01/2018--03/31/2018

NAME OF FILER: Sempra Energy and its Affiliates San Diego Gas & Electric and So. Cal. Gas Co.

Name & Address of Payee	Amount This Quarter	Cumulative Amount Since January 1 Biennial Legislative Session
[P] - Imprenta Communications Group San Marino CA 91108	3800.00	9633.32
[C] - Pete Conaty & Associates Sacramento CA 95814	4000.20	6666.88
[S] - Kent Kauss Sacramento CA 95814	2646.63	2646.63

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Subtotal of all payments itemized above	\$ 10446.83	
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TEXT ANNOTATION

PAGE 1

Schedule F635

Reference No:

Assembly Bills: 813,1184,1292,1552,1745,1796,1879,1945,1954,1956,1970,2057,2061,2068,2077,2091,2092,2120,2127,2145,2195,2208 - 2267,2278,2346,2380,2407,2431,2506,2515,2551,2569,2585,2645,2672,2693,2695,2726,2832,2885,2911,3001,3073,3102,3146,3187,3 - 201,3232. Senate Bills: 100,700,819,821,901,1000,1014,1015,1016,1028,1076,1088,1135,1151,1169,1181,1205,1256,1260,1338,1339,1 - 347,1369,1370,1399,1410,1434,1440,1463,1477,1478. Offices Lobbied: Governor's office,California Legislature,CARB,CEC,CISO,CPUC - ,California Resources Agency,California State Water Board.