



Public Advocates Office
California Public Utilities Commission

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PUBLIC ADVOCATES OFFICE DATA REQUEST
No. CalAdvocates-SC-SCG-2019-05

Date: August 13, 2019

Response Requested: **Tuesday, August 27, 2019**

To: **Corinne Sierzant** Phone: (213) 244-5354
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INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office (Cal PA) contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be

provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Any objection to a Data Request should clearly indicate to which part or portion of the Data Request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “SCG,” and “SoCalGas” mean Southern California Gas Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1

through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

1. Provide the “Political Activities Policy” referenced in the *CAU Approval and Commitment Policy* provided in SoCalGas’ response to Question 2 of SC-SCG-2019-04.
2. Provide the “Procurement Policy” referenced in the *CAU Approval and Commitment Policy* provided in SoCalGas’ response to Question 2 of SC-SCG-2019-04.
3. Provide the Excel workbook titled “IO_Form_503.xls,” referenced on the Work Order Authorization (WOA) provided in SoCalGas’ response to Question 1 of SC-SCG-2019-04.
4. Provide all WOAs or Authorizations of Expenditure (AFE) which controlled Standard Services Agreement No. 5660052135 (between SoCalGas and Marathon

Communications) prior to the WOA provided in SoCalGas' response to Question 1 of SC-SCG-2019-04.

5. Does SoCalGas consider the WOA which created the BALANCED ENERGY IO to be Ordinary course of business (OCB) or "base business" as defined in the CAU Approval and Commitment Policy?
 - a. If so, explain why this designation is appropriate.
 - b. Include any documentation used to support this designation.
6. Does SoCalGas consider the WOA which created the BALANCED ENERGY IO to be "Not in ordinary course of business, incremental projects or non-base business" as defined in the CAU Approval and Commitment Policy?
 - a. If so, explain why this designation is appropriate.
 - b. Include any documentation used to support this designation.
7. Does SoCalGas consider the founding and continued financial support of C4BES and activities related to C4BES to be base business?
 - a. Explain why this designation is appropriate.
 - b. Identify the elements of the CAU Approval and Commitment Policy apply to designation.
8. Provide all contracts (and contract amendments) covered by the WOA which created the BALANCED ENERGY IO.
9. Were all policies and procedures as described in the *CAU Approval and Commitment Policy* followed in regard to the creation, maintenance and execution of the WOA which created the BALANCED ENERGY IO?
 - a. Provide any and all internal audits or other documentation regarding internal review of the accounting and documentation regarding the WOA provided in response to Question 1 of SC-SCG-2019-04.
10. Were all invoices SoCalGas received from Marathon Communications in 2018 and 2019 reviewed in a manner consistent with all policies and procedures as described in the *CAU Approval and Commitment Policy*.
11. Were any reviews as described on page 6 of the *CAU Approval and Commitment Policy* performed for the WOA which created the BALANCED ENERGY IO?
 - a. If reviews were performed, provide all review documentation as described in the *CAU Approval and Commitment Policy*.
 - b. Explain why, or why not, a Technical/Economic Review was performed. Explain why, or why not, the Internal Review Checklist was completed.
12. Was Board approval obtained for the WOA which created the BALANCED ENERGY IO?
 - a. If yes, on what date was approval obtained?
 - b. Provide all documents provided to the board as part of the board approval.
13. Is nonrefundable O&M ratepayer funded?

14. Provide screenshots of the Purchase Order (PO) that controls Agreement No. 5660052135 (between SoCalGas and Marathon Communications) in the accounting system SAP. The screenshots should include the full content of the window with all content fully legible. If separate tabs exist within the PO, separate screenshots displaying the contents of each tab should be included. Submit all screenshots for the PO in one .pdf document.
15. If a PO distinct from the PO referenced in Question 13 has previously controlled Agreement No. 5660052135 (between SoCalGas and Marathon Communications), provide screenshots in the same manner as requested in Question 13. If applicable, provide one .pdf document for each PO.
16. Provide documentation that clearly indicates SoCalGas' intent has always been that work and expenses related to founding and supporting the organization that came to be known as Californians for Balanced Energy Solutions should be fully shareholder funded. The document should be dated and consistent with SoCalGas' response to Question 6 of SC-SCG-2019-02 (i.e.: dated late 2017 – early 2018). If no such documentation exists, please state that no documentation exists to substantiate the claim that it was always SoCalGas' intent that work and expenses related to founding and supporting the organization that came to be known as Californian for Balanced Energy Solutions should be shareholder funded.
17. The following questions refer to the WOA provided in response to Question 1 of SC-SCG-2019-04:
 - a. What does the check mark in the box next to "O&M" signify (upper right hand corner of the document?)
 - b. What does the handwritten number "28322.000" in the upper right hand corner signify?
 - c. What does the number "\$30M" below the signature of Sharan Tomkins signify?
 - d. On what date did Sharon Tomkins sign the WOA?
 - e. Was the WOA prepared 3/31/2019 revised at any point after March 28, 2019?
 - i. If yes, please provide the revised document, along with any documents included in the preparation and review of the revised WOA.
 - ii. If no, please provide all relevant documents providing accounting instruction to have invoices and costs recorded after 6/14/2019 booked to shareholder funded accounts on a going-forward basis.
18. What audit or compliance plan does the Sempra board have in reviewing charges intended to be recovered from shareholders.
19. Provide the initial WOA under which the initial Marathon contract (Contract Agreement 5660052135, which started January 26, 2018) was authorized.
 - a. Provide all documentation associated with the initial WOA.
 - b. If there is no WOA associated with Contract Agreement 5660052135, prior to the WOA prepared on 3/21/2019, please indicate that none exists, and provide an

explanation of how the lack of a WOA prior to 3/21/2019 is consistent with SoCalGas' CAU Approval and Commitment Policy.

20. Provide a list of all journal entries made to remove any charges from Responsible Cost Center 2200-2204 from March 1, 2019 through the date of this data request. For each item, please indicate:
 - a. The date the journal entry was executed.
 - b. The name and title of the SoCalGas employee who authorized the instruction to make the journal entry.
 - c. If that journal entry moved the charge to a shareholder funded account or not.
 - d. Identifying information regarding the charge (including, but not limited to, invoice number and Contract Agreement number, employee charged time)
21. Provide a list of all journal entries made to remove any charges from the "ENERGY POLICY and STRATEGY team" from March 1, 2019 through the date of this data request. For each item, please indicate:
 - a. The date the journal entry was executed.
 - b. The name and title of the SoCalGas employee who authorized the instruction to make the journal entry.
 - c. If that journal entry moved the charge to a shareholder funded account or not.
 - d. Identifying information regarding the charge (including, but not limited to, invoice number and Contract Agreement number, employee charged time).

END OF REQUEST