

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION ONE

SOUTHERN CALIFORNIA GAS
COMPANY,

Petitioner,

vs.

PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA,

Respondent.

Case No. B310811

Commission Resolution
ALJ-391 & Decision
D.21-03-001

**EXHIBITS TO ANSWER OF RESPONDENT
TO PETITION FOR WRIT OF REVIEW**

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June 1, 2021

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Exhibit No.	Description	Date
A	Sierra Club Motion to Deny Party Status to C4BES (R.19-01-011)	May 14, 2019
B	SoCalGas Data Response	June 14, 2019
C	SoCalGas Data Response (R.13-11-005)	February 7, 2020
D	PG&E Data Response	May 7, 2021
	Southern California Edison Data Response	May 10, 2021
	San Diego Gas & Electric Co. Data Response (R.20-08-020)	May 11, 2021

EXHIBIT A

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED
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Order Instituting Rulemaking Regarding Building
Decarbonization.

Rulemaking 19-01-011
(Filed January 31, 2019)

**SIERRA CLUB'S MOTION TO DENY PARTY STATUS TO CALIFORNIANS FOR
BALANCED ENERGY SOLUTIONS OR, IN THE ALTERNATIVE,
TO GRANT MOTION TO COMPEL DISCOVERY**

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Attorneys for Sierra Club

May 14, 2019

Document received by the CA 2nd District Court of Appeal.

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BALANCED ENERGY SOLUTIONS OR, IN THE ALTERNATIVE,
TO GRANT MOTION TO COMPEL DISCOVERY**

Pursuant to Rules 11.1 and 11.3 of the California Public Utility Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, Sierra Club files this Motion to Deny Party Status to Californians for Balanced Energy Solutions (“C4BES”), or, in the Alternative, to Grant Sierra Club’s Motion to Compel Discovery.

I. INTRODUCTION

Utilities are well-equipped to represent their own interests in Commission proceedings. The role of intervening parties is to provide perspectives independent of the utilities the Commission is charged with regulating. To allow otherwise would enable utilities to form front groups to amplify their agenda and obfuscate the actual extent of independent stakeholder support for their positions. In this proceeding, C4BES filed a Motion for Party Status and Reply Comments that present C4BES as “a coalition of natural and renewable natural gas users” and that omit any reference to its relationship with Southern California Gas Company (“SoCalGas”).¹ Yet information Sierra Club has been able to gather indicates that: 1) SoCalGas was primarily, if not entirely, responsible for founding C4BES; 2) SoCalGas in on the board of C4BES; 3) SoCalGas recruited members to join C4BES; 4) SoCalGas retained a communications firm to develop C4BES objectives and talking points prior to member recruitment; and 5) SoCalGas substantially compensated at least one C4BES board member after he agreed to join the organization. To Sierra Club’s knowledge, a utility has never gone so far as

¹ Motion for Party Status of C4BES (Mar. 13, 2019), <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M273/K180/273180146.PDF> (“C4BES Motion for Party Status”); Reply Comments of C4BES About the OIR Regarding Building Decarbonization (Mar. 25, 2019) (“C4BES Reply Comments”).

to create a separate organization that then intervened in a proceeding where the utility is also a party to file comments supporting utility positions.² C4BES' failure to disclose its relationship with SoCalGas in its Motion for Party Status and Reply Comments makes this conduct all the more egregious. Because utility-created front groups have no place in Commission proceedings, the Commission should grant Sierra Club's Motion, and deny party status to C4BES.

To the extent the Commission needs additional information on the relationship between SoCalGas and C4BES before it can reach a determination on the Motion to Deny Party Status to C4BES, the Commission should deny that motion without prejudice and grant Sierra Club's Motion to Compel Discovery. While the information Sierra Club has managed to obtain on the relationship between SoCalGas and C4BES is extremely troubling, it is also limited. Sierra Club issued targeted data requests to both SoCalGas and C4BES seeking basic information on the policy control that SoCalGas exercises over C4BES' filings in this proceeding, the extent to which SoCalGas underwrites the costs of C4BES activities, and the full extent of SoCalGas' role in recruiting members to the organization.³ Both SoCalGas and C4BES refused to respond and a meet and confer failed to resolve this discovery dispute.⁴ Full transparency on the extent of SoCalGas' control and influence over C4BES positions in this proceeding is critical to maintaining the integrity of Commission processes and relevant to C4BES' continued ability to participate as a party in this proceeding.

Accordingly, Sierra Club respectfully requests that the Commission:

- 1) Grant the Motion to Deny Party Status to C4BES, or, in the alternative,
- 2) Deny the Motion to Deny Party Status to C4BES without prejudice and compel:
 - a. C4BES to respond to Data Request Sierra Club-C4BES-1;
 - b. SoCalGas to respond to Data Request Sierra Club-SoCalGas-1;
 - c. Any additional discovery related to the relationship between SoCalGas and C4BES.

² See C4BES Reply Comments (supporting Opening Comments of SoCalGas on Order Instituting Rulemaking Regarding Building Decarbonization (Mar. 11, 2019)).

³ Attachment ("Attach.") A, Declaration of Matthew Vespa on Behalf of Sierra Club and supporting Exhibits.

⁴ *Id.*

II. DISCUSSION

A. Currently Available Information on SoCalGas' Involvement in C4BES is Sufficient to Deny Party Status to C4BES.

It is fundamentally inappropriate for the interests and bottom line of a regulated entity to be given duplicate representation in a Commission proceeding by an astroturf group it created and substantially controls. Information obtained by Sierra Club reveals that SoCalGas was responsible for C4BES' creation, for developing its organizational principles and talking points, and for member recruitment – which in at least one case, came with substantial financial compensation. The Commission has more than enough information to deny party status to C4BES and find C4BES violated Rule 1.1 of the Commission Rules of Practice and Procedure in failing to disclose its close relationship with SoCalGas and that it represents SoCalGas' interests in this proceeding.

1. *SoCalGas Formed C4BES and Actively Recruited its Members.*

When C4BES first launched in early 2019 to “fight the state’s march to building electrification,” SoCalGas sought to downplay its involvement, stating to reporters that it was merely “invited” to join the organization.⁵ Yet when later confronted with evidence of a more active relationship in C4BES' formation, SoCalGas admitted it “played a leading role in putting the group together.”⁶ Indeed, SoCalGas emails to entities in the public sector obtained through public records requests show SoCalGas employees actively recruiting members to join C4BES months before the group was incorporated.⁷ In September of 2018, SoCalGas public affairs employee Ken Chawkins emailed Matt Rahn of the Environmental Leadership Institute at Cal State, San Marcos, writing: “Hey... good to see you yesterday and glad you’ll join the C4BES effort. I’ll get you more info as we move forward.”⁸ Two other SoCalGas employees, Robert Visconti and Daniel McGivney, were copied on the email.⁹ A month later, Rahn received a subsequent email from Ken Chawkins welcoming him to the C4BES organization and describing

⁵ Attach. B, Colby Bermel, “Coalition forms to defend natural gas as fight emerges over building electrification,” Politico (March 5, 2019).

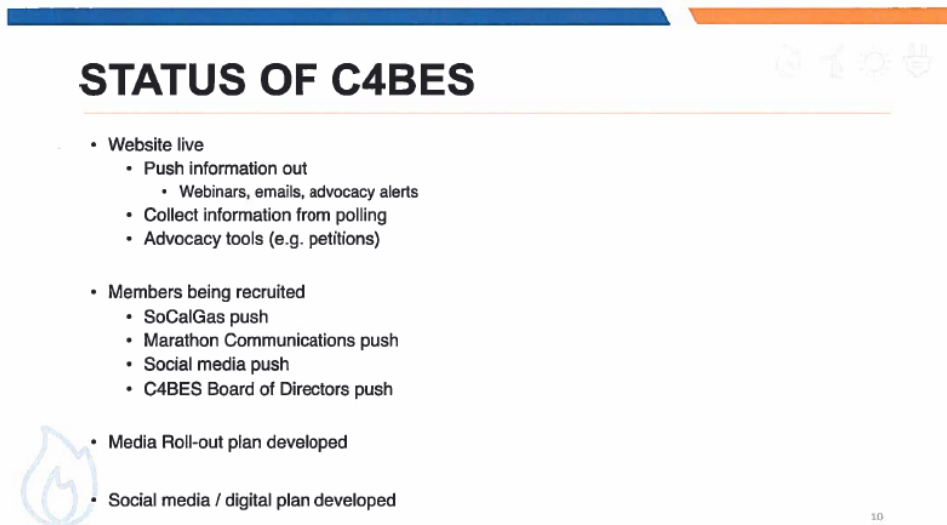
⁶ Sammy Roth, “California’s next frontier in fighting climate change: your kitchen stove,” L.A. Times (April 4, 2019), <https://www.latimes.com/business/la-fi-gas-stove-climate-change-southern-california-20190404-story.html>.

⁷ Articles of Incorporation of C4BES (filed Jan. 9, 2019), <https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=04231156-25523717>.

⁸ Attach. C, Email from Ken Chawkins, SoCalGas, to Matthew Rahn (Sept. 12, 2018).

⁹ *Id.*

the group as “in the formative stage.”¹⁰ A PowerPoint presentation from the first C4BES Board of Directors Meeting, held in February 2019, identifies SoCalGas continuing to take a lead role in recruiting members to the group.¹¹



2. ***SoCalGas Developed the Organizational Policy Principles for C4BES Prior to Recruiting Members, Which Are Now Duplicated in C4BES’ Motion for Party Status.***

SoCalGas also appears to be responsible for developing the guiding principles of C4BES. In the October 2018 email correspondence between Matt Rahn and SoCalGas’s Ken Chawkins, months before the launch of C4BES, Chawkins provided a private link and password to a preview of the organization’s website as well as two attached documents, titled “C4BES Principles” and “C4BES The Case,” that contained fully-formed organizational goals and principles for C4BES.¹² According to file metadata, the attachments circulated in the email were

¹⁰ Attach. D, Email from Ken Chawkins, SoCalGas, to Matthew Rahn (Oct. 3, 2018).

¹¹ Attach. E, C4BES, Board of Directors Meeting (PowerPoint Presentation), at slide 10 (Feb. 28, 2019). The other group described as taking a lead role in recruiting members, Marathon Communications (“Marathon”), may have been retained and funded by SoCalGas prior to C4BES being established. This topic is one of the areas in which Sierra Club seeks further information through discovery.

¹² Attach. D at 4-6.

written by the marketing consultancy Imprenta Communications.¹³ Imprenta’s website lists SoCalGas as a client.¹⁴

The C4BES Principles document developed by SoCalGas’ consultant and circulated by SoCalGas as part of its effort at member recruitment is virtually identical to the set of organizational principles now posted on the C4BES website.¹⁵

Core Principles Circulated by SoCalGas in October 2018 C4BES Recruitment Email	Final Core Principles on C4BES Website
<p style="text-align: center;">Core Principles</p> <p>Safe, reliable, and affordable energy is critical to California’s economic and environmental well-being.</p> <p>California households and businesses now have the ability to choose the type of energy that meets their specific needs. California voters overwhelmingly support energy choice.</p> <p>California requires balanced energy policies. The state should recognize that no single form of energy can power California.</p> <p>Energy policies should promote reliable, affordable, and environmentally sound forms of energy that meet California’s diverse needs.</p> <p>California’s electric rates are 45% higher than the national average. Californians shouldn’t have to choose between the environment and high-cost energy, and with affordable, reliable Natural and Renewable Natural Gas they do not have to choose.</p> <p>Natural and Renewable Natural Gas must remain components of California’s balanced energy portfolio. They complement electricity, solar, wind, hydrogen, and hydro-generated energy in powering our economy and fighting climate change.</p>	<p style="text-align: center;">Core Principles</p> <p>Clean, safe, reliable, and affordable energy is critical to California’s economic and environmental well-being.</p> <p>Today, all California households and businesses can choose the type of energy that meets their specific needs. And, in opinion survey after survey, California voters overwhelmingly support continued energy choice.</p> <p>California’s future will require balanced energy solutions. The state should support policies to ensure all forms of clean energy solutions are available to customers.</p> <p>Policies should promote reliable, affordable, and environmentally responsible forms of energy that meet California’s diverse needs, including both air quality and climate change emissions reduction goals.</p> <p>Californians shouldn’t have to choose between what’s good for the environment and what makes sense. Clean, safe, affordable and reliable Natural Gas and Renewable Gas can do both -- meet customer needs and protect California’s environment. These clean energy resources should continue to be available for customers to choose.</p> <p>For California, Natural Gas and Renewable Gas should continue to be part of California’s balanced energy portfolio. These clean energy resources complement California’s clean electricity, including solar, wind, and hydro-generated power. And, they can ensure the state’s climate goals are met, while California remains the Golden State.</p>

In essence, SoCalGas first established the principles governing C4BES’ operation and only then recruited members to populate the organization.

¹³ See Attach. D. Metadata on both attached documents indicates that the author is Mandy Xu, an employee of Imprenta Communications. Attach. F, Screenshots of Metadata; Attach. E at slide 5.

¹⁴ Imprenta Communications Group, “Clients,” <http://www.icgworldwide.com/> (last visited May 14, 2019). Sierra Club data requests to SoCalGas, which SoCalGas has refused to answer, seek confirmation that these documents were prepared at the direction of SoCalGas. Exhibit 1 to Attach. A, Data Request Sierra Club-SoCalGas-01, Question 5.

¹⁵ Compare Attach. D, with C4BES, “Core Principles,” <https://c4bes.org/wp-content/uploads/2019/05/C4BES-Principles.pdf>.

In addition to incorporating the founding principles developed by SoCalGas, C4BES also used the talking points SoCalGas’ consultant developed in the document titled “C4BES The Case,” and reiterated some of these points in its Motion for Party Status.

Talking Points from “C4BES The Case” Circulated by SoCalGas in October 2018 C4BES Recruitment Email¹⁶	C4BES Stated Objectives in Motion for Party Status
<p>“Gas is the most efficient and affordable clean energy source available. Millions prepare their meals, heat their water, and heat their homes and businesses with gas. NG plays a crucial role in manufacturing, industrial, and agricultural processes. Compressed NG in heavy duty vehicles is cutting air pollution. And combined with RNG, a non-fossil fuel, produces the cleanest heavy-duty vehicles commercially available. And because it is significantly more affordable than other prototype technologies, it achieves those benefits more efficiently as it becomes widely employed.”</p>	<p>“Gas remains the most efficient and affordable clean energy resource available to many. Millions of people heat their homes and water and cook their food with gas. Gas plays a crucial role for business and buildings, and in manufacturing, industrial, and agricultural processes. Compressed gas in heavy-duty vehicles is cutting air pollution. And when using RNG, a non-fossil, renewable fuel, heavy-duty vehicles can become the cleanest commercially available today. Importantly, because these vehicle engines are significantly more affordable than other technologies, they can achieve these benefits more cost effectively, especially as they become widely employed.” (C4BES Motion for Party Status filed March 13, 2019/Motion for Party Status Served to Parties March 12, 2019).¹⁷</p>
<p>Legislation on all-electric buildings “is NOT the fastest or most efficient way to address climate change. Electrification does not make sense for every use or circumstance.”</p>	<p>“[A]n all-electric approach is NOT the fastest nor most efficient way to address climate change. Electrification simply does not make sense for every use or circumstance” (C4BES Motion for Party Status filed March 13, 2019/Motion for Party Status Served to Parties March 12, 2019).</p>
<p>“Eliminating Californians’ choice of the energy (gas or electricity) that best meets their needs.”</p>	<p>“Eliminating Californians’ choice of the energy that best meets their needs.” (C4BES Motion for Party Status Served to Parties March 12, 2019).</p>
<p>“Raising drastically household utility bills between \$123--\$388 annually”</p>	<p>“Raising household electricity bills nearly \$400 annually” (C4BES Motion for Party Status Served to Parties March 12, 2019; <i>see</i></p>

¹⁶ Attach. D at 4.

¹⁷ On March 12, C4BES emailed the service list a Motion for Party Status dated March 7, 2019, stating the motion was “filed today with CPUC.” This document differs slightly from the Motion that was filed on March 13, 2019, which does not appear to have been served on parties.

	<i>also</i> C4BES Website (“Switching to all-electric appliances would cost CA consumers over \$7,200 and increase energy costs by up to \$388 per year”). ¹⁸
“Mandating industrial, manufacturing, and agriculture users to switch to costly electricity which for some is not technically or economically feasible”	“Mandating industrial, manufacturing, and agriculture users to switch to technically or economically infeasible electrical equipment” (C4BES Motion for Party Status Served to Parties March 12, 2019).
“Crippling the effort to reduce GHG emissions and air pollution by banning the use of Renewable Natural Gas”	“Crippling the effort to reduce short lived climate pollutants by banning the use of gas” (C4BES Motion for Party Status Served to Parties March 12, 2019).

SoCalGas is the driving force behind C4BES’ creation, the development of its guiding principles, and its messaging.

3. *After Being Recruited to Join the Board of C4BES, SoCalGas Gave at Least One Board Member \$25,000.*

While Sierra Club does not yet have complete information on how C4BES’ activities are financed, it is clear SoCalGas is financially compensating at least some organizations that agree to join the C4BES Board. For example, just two weeks after SoCalGas sent the email thanking Matt Rahn for joining the board of C4BES, it presented him with a \$25K check to sponsor the work his institute “is doing to educate the community, elected and appointed officials.”¹⁹

¹⁸ C4BES, “Facts,” <https://c4bes.org/facts/> (last visited May 14, 2019).

¹⁹ Randon Lane (@rrlane_socalgas), Twitter (Oct. 17, 2018), https://twitter.com/rlane_socalgas/status/1052602135198593024. It is possible this donation was partially or fully funded by ratepayer funds: SoCalGas has previously awarded ratepayer funds to academic institutions while couching these contributions as “donations” from SoCalGas itself. *See, e.g.* A. 17-10-007, Opening Brief of Sierra Club and Union of Concerned Scientists at 27-28 (Sept. 21, 2018).



In addition, publicly available information reveals that other C4BES Board Members belong to organizations that received donations from SoCalGas in 2017.²⁰ While C4BES may claim SoCalGas is but one of its board members, SoCalGas’ significant financial contributions to other members afford it additional influence over group decision-making.²¹

²⁰ In its 2017 CPUC General Order No. 77-M filing, SoCalGas reports donations to the following organizations, all of which are represented on the board of C4BES: Inland Empire Economic Partnership (Paul Granillo, Vice Chair of C4BES), Faith and Community Empowerment, San Gabriel Valley Economic Partnership, California Small Business Alliance, Southeast Churches Service Center, Congress of California Seniors, California Natural Gas Vehicle Coalition, and the Coalition for Renewable Natural Gas. Compare San Diego Gas & Electric Company and Southern California Gas Company, “Independent Accountants’ Report On Applying Agreed-Upon Procedures, General Order No. 77-M, Year Ended December 31, 2017,” https://www.socalgas.com/regulatory/documents/2017_REDACTED_SCG_GO-77.pdf and C4BES, “Board of Directors,” <https://c4bes.org/about-us/>.

²¹ A current list of C4BES Board Members, which includes SoCalGas Regional Vice President George Minter, is available at C4BES, “Board of Directors,” <https://c4bes.org/about-us/>.

4. ***C4BES's Motion for Party Status Failed to Provide the Commission with Any Indication of its Relationship with SoCalGas in Direct Contravention of Rule 1.4(b)(2).***

The Commission's Rules of Practice and Procedure require a person seeking party status by motion to "fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding."²² The C4BES Motion for Party Status states that the group represents "a coalition of natural and renewable natural gas users" and that it "can contribute to this OIR by representing the interests of gas industrial, commercial and residential users to the conversation."²³ C4BES's Motion for Party status not only failed to "fully disclose" its relationship with SoCalGas, it failed to mention SoCalGas at all. Given SoCalGas' seminal role in forming C4BES, developing its organizational principles and talking points, and financially compensating members for their participation, C4BES' effort to depict C4BES as representing interests independent of SoCalGas is extraordinarily deceptive. The material omission in C4BES' Motion of Party Status is sufficient grounds alone for denial and a finding that C4BES misled the Commission in direct contravention of Rule 1.1.²⁴

B. In the Alternative, the Commission Should Grant Sierra Club's Motion to Compel Discovery from C4BES and SoCalGas.

If the Commission allows C4BES to participate in this proceeding, transparency about its motives and financial incentives, as well as disclosure of what entities are controlling and influencing the organization's positions, is critical.²⁵ On April 9, 2019, Sierra Club issued targeted data requests to both SoCalGas and C4BES to better understand the extent of financial, communications, and policy support SoCalGas provides to C4BES and its role in the development of C4BES positions in this proceeding.²⁶ Both SoCalGas and C4BES refused to respond to the data requests, stating that the questions were outside the scope of the

²² CPUC Rule 1.4(b)(2).

²³ C4BES Motion for Party Status at 2, 3.

²⁴ Rule 1.1 of the Commission's Rules of Practice and Procedure requires participants in Commission proceedings "never to mislead the Commission or its staff by an artifice or false statement of fact."

²⁵ Based on information obtained through future discovery, Sierra Club may renew its motion to remove C4BES from intervenor participation in this proceeding. To the extent the Commission is inclined to grant C4BES party status now, Sierra Club should not be prejudiced against subsequently renewing its motion when more evidence is uncovered.

²⁶ Attach. A ¶¶ 2, 6; Exhibits 1 and 2 to Attach. A.

proceeding.²⁷ Sierra Club held a meet and confer with SoCalGas on April 29, 2019 and with C4BES on May 2, 2019, to attempt to resolve the disputes, but was unable to reach an agreement.²⁸

The information Sierra Club seeks through discovery – the extent of SoCalGas’ control over C4BES and whether the positions taken by C4BES in this proceeding are under the substantial control and influence of a regulated utility – is highly relevant to this proceeding. Sierra Club’s discovery is narrowly targeted to understand the extent of SoCalGas and Sempra’s role in creating C4BES, their influence on documents submitted in this proceeding, and any financial contributions the utility or its parent company made to the group.²⁹ For example, discovery is needed to reveal whether or to what extent SoCalGas is approving or reviewing C4BES’s filings in this proceeding. Discovery may also reveal how many of the board members of C4BES were recruited by SoCalGas, or by consultants acting under its direction, and how many were compensated by the utility for their participation.

While SoCalGas is only one of C4BES’ board members, the existence of multiple board members means little if a single board member, representing a regulated utility, has substantial influence and control over the organization’s positions. Understanding the full extent to which C4BES positions are influenced by SoCalGas is critical to transparency, the integrity of the intervenor process, and the Commission’s fundamental oversight responsibility over SoCalGas and other regulated utilities.

III. CONCLUSION

For the reasons set forth above, Sierra Club respectfully requests that its Motion to Deny Party Status to Californians for Balanced Energy Solutions is granted, or, in the alternative, that the Commission grant Sierra Club’s Motion to Compel Discovery.

²⁷ Exhibits 3 and 4 to Attach. A.

²⁸ Attach A, ¶¶ 6-7.

²⁹ Exhibits 1 and 2 to Attach. A.

Dated: May 14, 2019

Respectfully submitted,

/s/ Alison Seel

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Attorneys for Sierra Club

Document received by the CA 2nd District Court of Appeal.

INDEX OF ATTACHMENTS AND EXHIBITS

Attachment A – Affidavit of Matthew Vespa on Behalf of Sierra Club

Exhibit 1 to Attachment A – Data Request Sierra Club-SoCalGas-01 on behalf of Sierra Club to Southern California Gas Company

Exhibit 2 to Attachment A – Data Request Sierra Club-C4BES-01 on behalf of Sierra Club to Californians for Balanced Energy Solutions

Exhibit 3 to Attachment A – SoCalGas’ Letter Response Objecting to Sierra Club Data Request Sierra Club-SoCalGas-01

Exhibit 4 to Attachment A – C4BES’ Letter Response Objecting to Sierra Club Data Request Sierra Club-C4BES-01

Attachment B – Colby Bermel, “Coalition forms to defend natural gas as fight emerges over building electrification,” Politico (March 5, 2019)

Attachment C – Email from Ken Chawkins, SoCalGas, to Matthew Rahn (Sept. 12, 2018)

Attachment D – Email from Ken Chawkins, SoCalGas, to Matthew Rahn (Oct. 3, 2018)

Attachment E – C4BES, Board of Directors Meeting (PowerPoint Presentation), at slide 10 (Feb. 28, 2019)

Attachment F – Screenshots of Metadata for Documents “C4BES Principles” and “C4BES The Case”

Attachment A – Affidavit of Matthew Vespa on Behalf of Sierra Club

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Building
Decarbonization.

Rulemaking 19-01-011
(Filed January 31, 2019)

DECLARATION OF MATTHEW VESPA ON BEHALF OF SIERRA CLUB

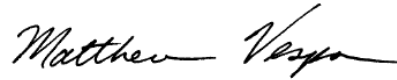
I, Matthew Vespa, declare as follows:

1. I am a Staff Attorney employed by Earthjustice, licensed to practice law in the state of California. I represent Sierra Club in this proceeding.
2. On April 9, 2019, I sent Data Request Sierra Club-SoCalGas-01 on behalf of Sierra Club to Southern California Gas Company (“SoCalGas”), by email to Christopher Bissonnette and Avisha Patel. This Data Request Sierra Club-SoCalGas-01 is attached as Exhibit 1.
3. On April 9, 2019, I sent Data Request Sierra Club-C4BES-01 on behalf of Sierra Club to Californians for Balanced Energy Solutions (“C4BES”), by email to Jon Switalski. This Data Request is attached as Exhibit 2.
4. On April 23, 2019, I received SoCalGas’ Letter Response Objecting to Sierra Club Data Request Sierra Club-SoCalGas-01. SoCalGas’ response is attached as Exhibit 3.
5. On April 23, 2019, I received C4BES’ Letter Response Objecting to Sierra Club Data Request Sierra Club-C4BES-01. C4BES’ response is attached as Exhibit 4.
6. On April 29, 2019, I met and conferred by phone with SoCalGas regarding the data request response. I attended the meeting on behalf of Sierra Club with Alison Seel, an Associate Attorney for the Sierra Club. SoCalGas was represented at the meeting by Shirley Arazi. After conferring in good faith, Sierra Club and SoCalGas were unable to resolve the dispute or reach an agreement.
7. On May 2, 2019, I met and conferred by phone with C4BES regarding this data request response. I attended the meeting on behalf of Sierra Club with Alison Seel, an Associate Attorney for the Sierra Club. Jon Switalski attended the meeting on behalf of C4BES.

After conferring in good faith, Sierra Club and C4BES were unable to resolve the dispute or reach an agreement.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief.

Dated: May 14 2019

A handwritten signature in black ink that reads "Matthew Vespa". The signature is written in a cursive style with a long, sweeping underline.

Matthew Vespa

**Exhibit 1 to Attachment A – Data Request Sierra Club-SoCalGas-01 on behalf
of Sierra Club to Southern California Gas Company**

CPUC Docket R.19-01-011

Order Instituting Rulemaking Regarding Building Decarbonization

Sierra Club Data Request Sierra Club-SoCalGas-01

To: Christopher Bissonnette, CBissonnette@semprarutilities.com
Avisha Patel, APatel@semprautilities.com

From: Matt Vespa, Earthjustice, on behalf of Sierra Club

Date Sent: April 9, 2019

Response Due: April 23, 2019

Please provide a response to the following First Set of Data Requests (Sierra Club-SoCalGas-01) propounded by the Sierra Club no later than COB April 23, 2019 via e-mail or, if voluminous, flashdrive by mail.

Please provide all e-mail responses to the following individuals. Responses via regular mail can be sent only to Matthew Vespa.

Matthew Vespa Earthjustice 50 California St., Suite 500 San Francisco, CA 94111 mvespa@earthjustice.org	Alison Seel Sierra Club 2101 Webster St., 13 th Floor Oakland, CA 94612 alison.seel@sierraclub.org
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This data request seeks information relating to R.19-01-011, Order Instituting Rulemaking Regarding Building Electrification. Sierra Club reserves the right to submit further data requests.

GENERAL INSTRUCTIONS

The following general instructions apply to all data requests propounded by Sierra Club on SoCalGas in this proceeding.

1. As to any data request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate data request.
2. Any objection to a data request should clearly indicate to which part or portion of the data request the objection is directed.
3. 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.

4. If, in answering any of these data requests, there is deemed to be any ambiguity in interpreting either the data request or a definition or instruction applicable thereto, promptly contact Matthew Vespa to obtain a clarification.

5. Responses to these data requests should be transmitted as they become available.

DEFINITIONS

- A. As used herein, the term “SOCALGAS” is used to refer to 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. 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.
- D. 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.
- E. 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.
- F. “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.
- G. 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.

SIERRA CLUB FIRST SET OF DATA REQUESTS

1. On March 7, 2019, Californians for Balanced Energy Solutions (“C4BES”) filed a Motion for Party Status in R.19-01-011. Page 2 of the Motion for Party Status states that C4BES “is a coalition on natural and renewable natural gas users.”
 - a. Is SOCALGAS a member of C4BES?
 - b. Does SOCALGAS provide financial support for C4BES? If yes, please identify the amount C4BES has receive from SOCALGAS in 2018 and in 2019 to date, respectively.
 - c. Did SOCALGAS review, draft, and/or provide feedback on the C4BES Motion for Party Status? If yes, please provide all communications between C4BES and SOCALGAS related to the C4BES Motion for Party Status.
 - d. Please identify the witness responsible for this answer.

2. On April 4, 2019, the Los Angeles Times published an article by Sammy Roth titled *California’s next frontier in fighting climate change: your kitchen*. The article is available at <https://www.latimes.com/business/la-fi-gas-stove-climate-change-southern-california-20190404-story.html>.
 - a. The article states that SOCALGAS “helped organize Californians for Balanced Energy Solutions.” Does SOCALGAS agree with this statement? If not, please explain why SOCALGAS believes it did not help organize C4BES.
 - b. The article states C4BES’ “board includes representatives from SoCalGas, the California Chamber of Commerce and the California Farm Bureau Federation, although the gas company played a leading role in putting the group together.” Does SOCALGAS agree with statement that it “played a leading role in putting [C4BES] together”? If not, please explain why SOCALGAS believes it did not play a leading role in putting C4BES together.
 - c. The article references a PowerPoint presentation by Ken Chawkins, public policy manager at SOCALGAS, presented to the C4BES Board that include a slide with the heading “Why We Are Here: Natural Gas Under Attack.” Please provide the referenced PowerPoint and any other presentations made by SOCALGAS to the C4BES Board.

3. On March 25, 2019, CA4BES filed Reply Comments in R.19-01-011.
 - a. Did SOCALGAS review, draft, and/or provide feedback on the C4BES Reply Comments? If yes, please provide all communications between C4BES and SOCALGAS related to the C4BES Reply Comments.
 - b. Please identify the witness responsible for this answer.

4. Below is a screenshot of an email dated October 3, 2018 from Ken Chawkins (with hyperlink to email address KChawkins@semprautilities.com) to Matthew Rahn (with hyperlink to email address mrahn@csusm.edu) that begins with the sentence “I want to welcome you aboard and thank you for joining Californians for Balanced Energy Solutions (C4BES).”

From: [Chawkins, Ken D](#)
To: [Matthew Rahn](#)
Cc: jim@jamci.com
Subject: 3rd Party effort
Date: Wednesday, October 3, 2018 11:04:03 AM
Attachments: [C4BES The Case - FINAL.pdf](#)
[C4BES Principles - FINAL.pdf](#)

Dear Matt,

I want to welcome you aboard and thank you for joining Californians for Balanced Energy Solutions (C4BES). Whether you are a gas supplier or user, our goal is to achieve a reasonable and balanced approach to energy policy for California. Your insight and expertise will be invaluable to this mission.

Let me reiterate that this effort is not anti-electric power. Electricity generated by solar, wind, and hydro has an important role to play for the environment and the economy. However, we are concerned about the mistaken view that electricity should be the only acceptable form of energy without recognizing the value natural and renewable natural gas play in providing society's varied energy needs.

The "electric-only" approach ignores the impact of higher costs that will be imposed on households and businesses, the reduction of overall energy reliability, and the impracticality of replacing gas with electricity in thousands of households and businesses. The move toward a singular source of energy does not take into account the critical role of gas in fighting climate change, and would deny to millions of Californians the choice to use the energy that best meets their needs.

In the coming months C4BES will recruit others to join this broad coalition. We will tell the public and the media about the importance of natural and renewable natural gas and will emphasize the importance of energy choice, energy reliability, and energy affordability; essential elements in the fight against global climate change.

In anticipation of our official launch in January of 2019, I am attaching a Case Statement that highlights our position and objectives along with our guiding principles. Since we are in the formative stage of the organization and plan to publicly introduce the group in January, please do not forward these materials. We will finalize these drafts in the near future. We have shared them with you so that you may share your thoughts and comments with us.

In addition to the written pieces, we have developed a draft web-site that we would like you to see. Please use the following link and password to preview website. We would appreciate your feedback here as well:

Link: <https://quasiaut.com/>

Limited user access:

username and password: C4BES

Again, many thanks for your commitment. We look forward to working with you to achieve a balanced approach to our state's energy policy.

Sincerely,

Ken

- a. Is Ken Chawkins a SOCALGAS employee? If yes, please provide his title.
- b. Please confirm that the Ken Chawkins that sent this email is the same Ken Chawkins identified in the LA Times article referenced in Question 2 of this data request.

- c. Please provide all communications from SOCALGAS to third parties related to joining C4BES.
5. The above referenced email contained two attachments, C4BES The Case, and C4BES Principles (both documents attached to this data request). Metadata on these documents indicated their author is Mandy Xu.
- a. Did SOCALGAS review, draft and/or provide feedback on either of the attached documents? If yes, please provide all communications related to their development.
 - b. Did SOCALGAS retain a third party to draft the attachments? If yes, please identify the entity responsible for drafting the attachments and indicate whether that entity is the employer of Mandy Xu.

**Exhibit 2 to Attachment A – Data Request Sierra Club-C4BES-01 on behalf of
Sierra Club to Californians for Balanced Energy Solutions**

CPUC Docket R.19-01-011

Order Instituting Rulemaking Regarding Building Decarbonization

Sierra Club Data Request Sierra Club-C4BES-01

To: Jon Switalksi
From: Matt Vespa, Earthjustice, on behalf of Sierra Club
Date Sent: April 9, 2019
Response Due: April 23, 2019

Please provide a response to the following First Set of Data Requests (Sierra Club-C4BES-01) propounded by the Sierra Club no later than COB April 23, 2019 via e-mail or, if voluminous, flashdrive by mail.

Please provide all e-mail responses to the following individuals. Responses via regular mail can be sent only to Matthew Vespa.

Matthew Vespa
Earthjustice
50 California St., Suite 500
San Francisco, CA 94111
mvespa@earthjustice.org

Alison Seel
Sierra Club
2101 Webster St., 13th Floor
Oakland, CA 94612
alison.seel@sierraclub.org

This data request seeks information relating to R.19-01-011, Order Instituting Rulemaking Regarding Building Electrification. Sierra Club reserves the right to submit further data requests.

GENERAL INSTRUCTIONS

The following general instructions apply to all data requests propounded by Sierra Club on Californians for Balanced Energy Solutions (“C4BES”) in this proceeding.

1. As to any data request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate data request.
2. Any objection to a data request should clearly indicate to which part or portion of the data request the objection is directed.
3. 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.

4. If, in answering any of these data requests, there is deemed to be any ambiguity in interpreting either the data request or a definition or instruction applicable thereto, promptly contact Matthew Vespa to obtain a clarification.
5. Responses to these data requests should be transmitted as they become available.

DEFINITIONS

- A. As used herein, the term “SOCALGAS” is used to refer to 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. As used herein, the term “SEMPRA” is used to refer to SEMPRA ENERGY, the parent company of SOCALGAS, 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.
- C. 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.
- 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.

SIERRA CLUB FIRST SET OF DATA REQUESTS

1. On March 7, 2019, C4BES filed a Motion for Party Status in R.19-01-011. Page 2 of the Motion for Party Status states that C4BES “is a coalition of natural and renewable natural gas users.”
 - a. Is SOCALGAS a member of C4BES?
 - b. Does SOCALGAS provide financial support for C4BES? If yes, please identify the amount C4BES has received from SOCALGAS in 2018 and in 2019 to date, respectively.
 - c. Does SEMPRA provide financial support for CA4BES? If yes, please identify the amount C4BES has receive from SEMPRA in 2018 and in 2019 to date, respectively.
 - d. What is the total amount of financial support provided to C4BES from its members in 2018 and in 2019 to date respectively?
 - e. Did SOCALGAS review, draft, and/or provide feedback on the C4BES Motion for Party Status? If yes, please provide all communications between C4BES and SOCALGAS related to the C4BES Motion for Party Status.
 - f. Did SEMPRA review, draft, and/or provide feedback on the C4BES Motion for Party Status? If yes, please provide all communications between C4BES and SEMPRA related to the C4BES Motion for Party Status.
 - g. Was the content if the Motion for Party Status derived all or in part from materials provided to C4BES from SoCalGas? If yes, please provide the source materials used to draft the Motion for Party Status.
 - h. Please identify the witness responsible for this answer.

2. On March 25, 2019, C4BES filed Reply Comments in R.19-01-011.
 - a. Did SOCALGAS review, draft, and/or provide feedback on the C4BES Reply Comments? If yes, please provide all communications between C4BES and SOCALGAS related to the C4BES Reply Comments.
 - b. Did SEMPRA review, draft, and/or provide feedback on the C4BES Reply Comments? If yes, please provide all communications between C4BES and SEMPRA related to the C4BES Reply Comments.
 - c. Please identify the witness responsible for this answer.

3. Below is a screenshot of the body of an email sent by C4BES on or around April 3, 2019.

Californians for
Balanced Energy Solutions



[Address Correction] The CPUC Needs to Hear from You

The California Public Utilities Commission needs to hear from you on **Monday, April 8**, when it hosts a workshop on building decarbonization.

The event, which runs from **9:30 a.m. to 2:30 p.m. at the [La Kretz Innovation Campus Amphitheatre, 525 S. Hewitt St. in the Arts District](#)**, will be an opportunity for stakeholders to tell decision-makers from the CPUC and California Energy Commission how important it is for natural gas and renewable gas to be included in the state energy's portfolio as it moves forward with its ambitious plan to reduce greenhouse gas emissions associated with energy use in buildings. The objectives of the workshop are to develop a shared understanding of key policy questions, learn from the actions taken by local agencies, and consider possible approaches for implementing the programs required by SB 1477.

Date: Monday, April, 8, 2019

Time: 9:30 AM - 2:30 PM

Location: Los Angeles Cleantech Incubator (LACI) La Kretz Innovation Campus Amphitheatre

Address: 525 South Hewitt Street, Los Angeles, California 90013

Representatives of [Californians for Balanced Energy Solutions \(C4BES\)](#), a coalition of natural gas and renewable gas suppliers and users whose members include small and large businesses, labor, agriculture, and nonprofits that serve seniors and low-income communities, will be on hand to advocate for the continued use of natural gas and renewable gas, and we hope that we can count on supporters like you to join us in this important fight.

We should not accept that there is only one way to reduce building emissions. We must fight climate change while protecting energy reliability, affordability, and choice. The right mix of policies will create a powerful alliance for reducing emissions.

For more information about the April 8 CPUC workshop and details on how you can help, please contact C4BES Executive Director Jon Switalski at (310) 625-4072 or jswitalski@c4bes.org.

Thank you!

- a. Did SOCALGAS review, draft, and/or provide feedback on this email? If yes, please provide all communications between C4BES and SOCALGAS related to this email.
- b. Did SEMPRAs review, draft, and/or provide feedback on this email? If yes, please provide all communications between C4BES and SEMPRAs related to the C4BES this email.
- c. Was this email prepared or distributed by a consultant to C4BES? If yes, please identify the name of the consultant. If yes, please indicate whether the cost of the services provided by the consultant are paid all or in part by SOCALGAS or SEMPRAs.
- d. Please identify the witness responsible for this answer.

4. Does C4BES contract with third party consultants for communications, outreach, and/or lobbying services, including but not limited to Marathon Communications and Imprenta Global Communications, that are paid all or in part by SOCALGAS and/or SEMPRA? If yes, please identify the firms providing these services and the total amount paid or owed by SOCALGAS and/or SEMPRA to date.

Exhibit 3 to Attachment A – SoCalGas’ Letter Response Objecting to Sierra Club Data Request Sierra Club-SoCalGas-01



Christopher M. Bissonnette
Acting Assistant General Counsel
Regulatory

555 W. 5th Street, GT14G1
Los Angeles, CA 90013-1011

Tel: 213.244.2946
Fax: 213.629.9620
cbissonnette@SempraUtilities.com

April 23, 2019

Matthew Vespa
Earthjustice
50 California St., Suite 500
San Francisco, CA 94111
mvespa@earthjustice.org

Alison Seel
Sierra Club
2101 Webster St., 13th Floor
Oakland, CA 94612
alison.seel@sierraclub.org

Dear Ms. Seel and Mr. Vespa:

This letter responds to your data request dated April 9, 2019, to which we object pursuant to Rule 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure.

This proceeding is critically important to SoCalGas customers who will be affected by Statewide policies governing the energy choices they have historically been free to make in their own homes and businesses. We have represented our customers' interests – customers who pay rates for natural gas to provide the most basic services like heating and cooking – for more than 150 years, and we will continue to do so, including in this proceeding. Many of our customers prefer natural gas end-uses in their homes or businesses. Moreover, some businesses could not operate without a gas solution, whether natural gas, renewable natural gas, or hydrogen. The legislation prompting this proceeding mandates exploring carbon-neutral options, something we support; the legislation does not preordain a mandate to force our customers into electrification-only solutions without regard to their choice in energy, affordability, or reliability.

Although not relevant to the issues in this proceeding, we are a founding member of the non-profit Californians for Balanced Energy Solutions (C4BES), along with a diverse coalition of interested and affected members including labor, industry, communities of faith, and educators. This coalition grew out of the Commission's proposal in 2017 for a gas moratorium in Los Angeles County. Information about C4BES, its mission, and its members is available at <https://c4bes.org/>.

A data request in a California Public Utility Commission proceeding must be relevant, as defined by Rule 10.1 of the Commission’s Rules of Practice and Procedure. Relevance means that the discovery must pertain to “a matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” The questions you asked SoCalGas are not relevant or within scope of this proceeding.

If you seek relevant information on our proposals in this proceeding (once we get to that stage of the proceeding) regarding the importance of balanced energy, customer choice, affordability, or reliability, we will provide such information to your organizations consistent with the Commission’s rules regarding data requests.

Sincerely,

/s/ Christopher M. Bissonnette

Christopher M. Bissonnette
Acting Assistant General Counsel

cc: Avisha Patel, Southern California Gas Company
Californians for Balanced Energy Solutions

**Exhibit 4 to Attachment A – C4BES’ Letter Response Objecting to Sierra
Club Data Request Sierra Club-C4BES-01**



Dear Mr. Vespa and Ms. Seel:

This letter is a response to your request dated April 9, 2019.

Californians for Balanced Energy Solutions is a 501 C4 organization incorporated in California. Its Board and information about its purpose and activities is publicly available and also on its website.

One can see that Southern California Gas is a member of its Board. Many members of the Board are involved in the matters of the organization, its public comments, as well as its financial health.

C4BES believes this proceeding is of critical importance to energy consumers throughout the state, especially those reliant on gas energy for their homes and businesses. We also believe that balanced energy solutions are key for California to achieve its climate and clean air goals, and to prosper.

We have organized, and are participating in this proceeding, to represent constituent interests.

Our understanding is that a data request in a California Public Utility Commission proceeding must be relevant, as defined by Commission Rules. From our perspective none of the questions asked seem relevant to the proceeding, and therefore we object to your data request. We will be pleased to share our perspectives related to matters germane to what we understand to be a proceeding addressing building decarbonization.

Sincerely,

Jon Switalski
Executive Director

Attachment B – Colby Bermel, “Coalition forms to defend natural gas as fight emerges over building electrification,” Politico (March 5, 2019)

CALIFORNIA: CEC & 4 OTHERS

Coalition forms to defend natural gas as fight emerges over building electrification

BY COLBY BERMEL | 03/05/2019 03:24 PM EST



C4BES' site takes an ominous turn, warning that "there are powerful organizations that are working to take away your right to choose affordable natural and renewable gas" for cooking and heating. | Getty Images

SACRAMENTO — California's largest business groups and Southern California Gas are teaming up to fight the state's march toward building electrification, opening another major battleground in the state's push to reduce greenhouse gas emissions.

They are forming a new coalition, Californians for Balanced Energy Solutions, just as the California Energy Commission is writing rules to help the state cut building emissions 40 percent below 1990 levels by 2030.

Environmentalists and electric companies are clamoring for aggressive changes that would curb natural gas use in homes and offices, moving California toward greater reliance on electricity from renewable sources. They say the state has dragged its feet on retrofitting buildings and imposing requirements for new homes.

The new group's 26 board members represent some of the state's most influential business entities including the California Chamber of Commerce, California Farm Bureau Federation and Southern California Gas, the Sempra Energy subsidiary with 21.9 million customers and \$3.9 billion in operating revenue.

SoCalGas was largely opposed to a document passed last month by the CEC that established goals to help reduce building emissions. Regulators [approved](#) the biennial plan in late February despite a SoCalGas objection that it would supposedly mandate electric appliances over gas-powered ones.

The CEC's Integrated Energy Policy Report didn't implement any specific solutions, which are slated to be published by 2021. But the document's broad strokes, developed throughout 2018, were apparently enough to prompt the creation of Californians for Balanced Energy Solutions, or C4BES, before the agency's February vote. C4BES [registered](#) as a nonprofit with the California secretary of state in early January.

SoCalGas spokesperson Christine Detz said the utility was "invited" by C4BES to join its board. Pacific Gas & Electric, which has 4.3 million gas customers, is not a member of C4BES, "nor have we been engaging in discussions or gatherings with this group," spokesperson James Noonan said.

"C4BES' goal is to educate the public about the importance of natural and renewable gas for environmental quality and our economy, to preserve energy reliability and affordability," C4BES Executive Director Jon Switalski wrote in an email. "We believe calls to eliminate gas and rely only on electricity for California's energy needs are shortsighted and will ultimately harm the environment and the economy."

The group will make a "formal public announcement within the next two weeks," Switalski added, although he did not elaborate.

The CEC's buildings [plan](#) does recommend the establishment of zero-emission goals, but it subsequently says the agency should craft a strategy to "reduce" air pollution and "encourage" buildings' electrification, rather than a total and immediate shift away from gas.

According to the American Gas Association's rankings, SoCalGas in 2017 was the No. 1 gas utility in the country by total [revenue](#) and total [customers](#), and second only in sales [volume](#).

SoCalGas senior environmental policy adviser Edith Moreno said at the CEC's February meeting that the utility wants a set emissions standard that would give building owners latitude to choose how to reduce pollution, rather than the agency prescribing a certain policy or technology like electrification. But she also asked, however, that commissioners "look at how [renewable natural gas] can play a critical role in California's long-term climate goals."

Other members of the C4BES board would stand to benefit from the continued usage, sale and production of gas, including the Agricultural Energy Consumers Association. Days before the CEC

vote, SoCalGas parent company Sempra [promoted](#) renewable natural gas, or RNG, coming from a "dairy digester" that captures emissions from cow manure.

The new group will likely face off in the public square against the 65-member Building Decarbonization Coalition, which has its own heavy hitters, including conglomerates Mitsubishi Electric and Ingersoll Rand, investor-owned utility Edison International and the municipal utilities of Los Angeles and Sacramento, among more traditional supporters like environmental groups.

C4BES portrays itself as a consumer-minded initiative, with its website featuring stock photos of smiling families eating in their kitchens. But the site takes an ominous turn, warning that "there are powerful organizations that are working to take away your right to choose affordable natural and renewable gas" for cooking and heating.

"For them, it's electricity or nothing!" the site says.

Detz said SoCalGas looks forward to "adding our voice to those of social service organizations, churches, health care facilities and businesses and labor organizations to bring balance to the energy policy debate." But others see C4BES differently.

Policymakers are "not going to be sympathetic to companies coming in and saying, 'You can't change the way things are because we're going to lose money,'" said Sierra Club California Director Kathryn Phillips. "So what they do is go out and develop these AstroTurf groups.

"What they're doing is trying to keep the status quo," she said of SoCalGas. "They want us consumers to remain as dependent on methane gas as possible, and the more dependent we are on that, the better their bottom line looks."

AUTHORS



Colby Bermel
cbermel@politico.com | @ColbyBermel

RELATED ARTICLES

Utility-backed report takes aim at natural gas in buildings

Top CARB official to depart for renewable natural gas industry group

SoCalGas says a fifth of its supply will be cleaner gas by 2030

**Attachment C – Email from Ken Chawkins, SoCalGas, to Matthew Rahn
(Sept. 12, 2018)**

From: [Chawkins, Ken D](#)
To: [Matthew Rahn](#)
Cc: [Visconti, Robert A.](#); [McGivney, Daniel](#)
Subject: FW: Candidate search: Growing Inland Achievement
Date: Wednesday, September 12, 2018 9:44:49 AM
Attachments: [Position Description - Growing Inland Achievement.pdf](#)

Hey...good to see you yesterday and glad you'll join the C4BES effort. I'll get you more info as we move forward.

Thought I'd send this your way...you likely have more connections out there!

Let me know more details about when I'll be speaking to the class, etc...And if you'll resend the material, I'll get with Robert and Dan to see about who should attend from here AND if there are others who should attend as well.

Cheers!

Ken

From: Linda Fowells <lfowells@communitypartners.org>
Sent: Tuesday, September 11, 2018 6:31 PM
Subject: [EXTERNAL] Candidate search: Growing Inland Achievement

Hi friends,

Passing this along, in case you know of anyone who would be interested in the President and CEO position described in the attached announcement and in the recruiter's email below.

I hope you're well!

Linda Fowells
Executive Vice President
Community Partners
1000 North Alameda Street, Suite 240 | Los Angeles, CA 90012
direct: 213-346-3211 | main: 213-346-3200 | lfowells@CommunityPartners.org
Follow us: [@CommunityPrtnrs](#)
[Subscribe](#) to our newsletter

Accelerating ideas into action to advance the public good.

Interested in fiscal sponsorship? Check out my Grantspace article on how to [find a fiscal sponsor that fits](#).

**Attachment D – Email from Ken Chawkins, SoCalGas, to Matthew Rahn
(Oct. 3, 2018)**

From: [Chawkins, Ken D](#)
To: [Matthew Rahn](#)
Cc: jim@jamci.com
Subject: 3rd Party effort
Date: Wednesday, October 3, 2018 11:04:03 AM
Attachments: [C4BES The Case - FINAL.pdf](#)
[C4BES Principles - FINAL.pdf](#)

Dear Matt,

I want to welcome you aboard and thank you for joining Californians for Balanced Energy Solutions (C4BES). Whether you are a gas supplier or user, our goal is to achieve a reasonable and balanced approach to energy policy for California. Your insight and expertise will be invaluable to this mission.

Let me reiterate that this effort is not anti-electric power. Electricity generated by solar, wind, and hydro has an important role to play for the environment and the economy. However, we are concerned about the mistaken view that electricity should be the only acceptable form of energy without recognizing the value natural and renewable natural gas play in providing society's varied energy needs.

The "electric-only" approach ignores the impact of higher costs that will be imposed on households and businesses, the reduction of overall energy reliability, and the impracticality of replacing gas with electricity in thousands of households and businesses. The move toward a singular source of energy does not take into account the critical role of gas in fighting climate change, and would deny to millions of Californians the choice to use the energy that best meets their needs.

In the coming months C4BES will recruit others to join this broad coalition. We will tell the public and the media about the importance of natural and renewable natural gas and will emphasize the importance of energy choice, energy reliability, and energy affordability; essential elements in the fight against global climate change.

In anticipation of our official launch in January of 2019, I am attaching a Case Statement that highlights our position and objectives along with our guiding principles. Since we are in the formative stage of the organization and plan to publicly introduce the group in January, please do not forward these materials. We will finalize these drafts in the near future. We have shared them with you so that you may share your thoughts and comments with us.

In addition to the written pieces, we have developed a draft web-site that we would like you to see. Please use the following link and password to preview website. We would appreciate your feedback here as well:

Link: <https://quasiaut.com/>

Limited user access:

username and password: C4BES

Again, many thanks for your commitment. We look forward to working with you to achieve a balanced approach to our state's energy policy.

Sincerely,

Ken

From: [Matthew Rahn](#)
To: [Chawkins, Ken D](#)
Subject: Re: 3rd Party effort
Date: Friday, October 12, 2018 9:41:51 AM
Attachments: [csusm_share-logo_150x150.png](#)

This is a really good website. And it fits perfectly with your topic in a couple of weeks! I'm not sure when this is going live, but it would be good to highlight it for the students in the class!

Best,
Matt

Matt Rahn, PhD, MS, JD

Director / Research Faculty
Environmental Leadership Institute
Wildfire Research Program
mrahn@csusm.edu
Phone (619) 846-1916
43890 Margarita Rd., Temecula, CA 92592



On Oct 3, 2018, at 11:03 AM, Chawkins, Ken D
<KChawkins@semprautilities.com> wrote:

Dear Matt,

I want to welcome you aboard and thank you for joining Californians for Balanced Energy Solutions (C4BES). Whether you are a gas supplier or user, our goal is to achieve a reasonable and balanced approach to energy policy for California. Your insight and expertise will be invaluable to this mission.

Let me reiterate that this effort is not anti-electric power. Electricity generated by solar, wind, and hydro has an important role to play for the environment and the economy. However, we are concerned about the mistaken view that electricity should be the only acceptable form of energy without recognizing the value natural and renewable natural gas play in providing society's varied energy needs.

The "electric-only" approach ignores the impact of higher costs that will be imposed on households and businesses, the reduction of overall energy reliability, and the impracticality of replacing gas with electricity in thousands of households and businesses. The move toward a singular source of energy does not take into account the critical role of gas in fighting climate change, and would deny to millions of Californians the choice to use the energy that best meets their needs.

In the coming months C4BES will recruit others to join this broad coalition. We will tell the public and the media about the importance of natural and renewable natural gas and will emphasize the importance of energy choice, energy reliability, and energy affordability; essential elements in the fight against global climate change.

In anticipation of our official launch in January of 2019, I am attaching a Case Statement that highlights our position and objectives along with our guiding principles.

Since we are in the formative stage of the organization and plan to publicly introduce the group in January, please do not forward these materials. We will finalize these drafts in the near future. We have shared them with you so that you may share your thoughts and comments with us.

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Again, many thanks for your commitment. We look forward to working with you to achieve a balanced approach to our state's energy policy.

Sincerely,

Ken

<C4BES The Case - FINAL.pdf><C4BES Principles - FINAL.pdf>



The Case

California leads America's effort to reduce Greenhouse Gas (GHG) emissions with innovative policies that have achieved significant reductions. California households and businesses that support these policies include millions who rely on and enjoy the environmental and economic benefits derived from using Natural Gas (NG) and Renewable Natural Gas (RNG).

Californians for Balanced Energy Solutions (C4BES), a coalition of gas suppliers, users, and consumers, strongly supports efforts to reduce GHG emissions and air pollution and asserts that NG and RNG should continue to play vital roles in reducing GHG emissions and air pollution.

Gas is the most efficient and affordable clean energy source available. Millions prepare their meals, heat their water, and heat their homes and businesses with gas. NG plays a crucial role in manufacturing, industrial, and agricultural processes. Compressed NG in heavy duty vehicles is cutting air pollution. And combined with RNG, a non-fossil fuel, produces the cleanest heavy-duty vehicles commercially available. And because it is significantly more affordable than other prototype technologies, it achieves those benefits more efficiently as it becomes widely employed.

However, in their zeal to reduce GHG emissions some policy makers and regulators along with some environmental organizations want to curb and ultimately eliminate the use of NG and RNG and force Californians to rely only on expensive electric energy. This year legislation was introduced in Sacramento to outlaw the use of natural gas in all buildings constructed after 2030!

C4BES believes that this is a needless overreach and, in fact, is NOT the fastest or most efficient way to address climate change. Electrification does not make sense for every use or circumstance.

Californians for Balanced Energy Solutions (C4BES) believes the electric-only crusade is well-intentioned but seriously misguided. If successful, there will be harmful, unintended consequences including:

- Eliminating Californians' choice of the energy (gas or electricity) that best meets their needs.
- Raising drastically household utility bills between \$123--\$388 annually; this will affect severely California's lowest income residents.
- Mandating industrial, manufacturing, and agriculture users to switch to costly electricity which for some is not technically or economically feasible.
- Crippling the effort to reduce GHG emissions and air pollution by banning the use of Renewable Natural Gas which in many instances is far cleaner and cheaper than electrification.

C4BES seeks a reasonable and balanced approach to energy policy for California; one that will help reduce GHGs and air pollution quickly and efficiently with fewer impacts to residential, commercial and industrial users.

Join us to Oppose “One Size Fits All” Proposals and Help Spread the Word about Natural and Renewable Natural Gas by:

- ✓ Educating the public, the media, and policymakers about the importance of NG and RNG for California’s quality of life, economy, and environment.
- ✓ Educating the public, the media, and policymakers about the importance of balanced energy solutions that will protect the environment and foster a vibrant economy.
- ✓ Opposing proposals driven by perspectives that are not concerned with economic impacts on businesses or low-income residents nor are truly interested in achieving air quality improvements quickly or efficiently.
- ✓ Supporting energy policies that promote technology-neutral solutions not shortsighted “feel good” proposals.

And by Solutions that:

1. Preserve **Choice** so California households and businesses can select the kind of energy that meets their specific needs.
2. Promote energy **Reliability and Affordability** not mandates for electricity.
3. Maximize the use of **Renewable Natural Gas** to supplement Natural Gas in order to significantly reduce GHG emissions.
4. Employ the **Right Energy in the Right Place** to achieve the best result.

What can you do?

1. **Join CBES by going to the “website/sign up” so you receive updates about important energy issues need your attention (<https://quasiat.com/>).**
2. **Increase your level of participation by joining a diverse and engaged Board of Advisors with invitations to special energy-focused events and private briefings on important energy policy issues facing California.**

Contribute! The “electrify all” campaign is increasingly well funded by organizations that demonize natural gas. We need you financial support to get the word out and oppose their misguided energy policies. Go to C4BES website to contribute and join our cause.



Core Principles

Safe, reliable, and affordable energy is critical to California's economic and environmental well-being.

California households and businesses now have the ability to choose the type of energy that meets their specific needs. California voters overwhelmingly support energy choice.

California requires balanced energy policies. The state should recognize that no single form of energy can power California.

Energy policies should promote reliable, affordable, and environmentally sound forms of energy that meet California's diverse needs.

California's electric rates are 45% higher than the national average. Californians shouldn't have to choose between the environment and high-cost energy, and with affordable, reliable Natural and Renewable Natural Gas they do not have to choose.

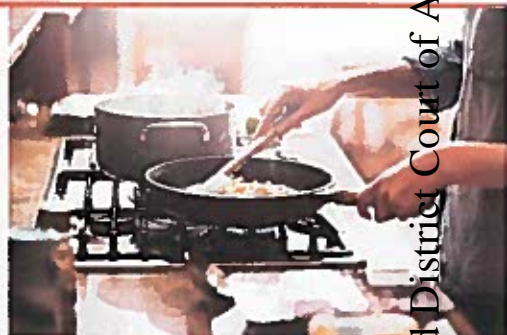
Natural and Renewable Natural Gas must remain components of California's balanced energy portfolio. They complement electricity, solar, wind, hydrogen, and hydro-generated energy in powering our economy and fighting climate change.

Attachment E - C4BES, Board of Directors Meeting (PowerPoint Presentation), at slide 10 (Feb. 28, 2019)



Californians for Balanced Energy Solutions

Board of Directors Meeting
Thursday, February 28, 2019



WHO WE ARE



Californians for Balanced Energy Solutions is a coalition of natural and renewable gas users. Our goal is to educate Californians about the importance of natural and renewable gas for improving the environment and providing for a strong economy.

We support balanced energy policies that fight climate change while protecting energy choice, reliability, and affordability.





PURPOSE

Purpose is to Educate opinion leaders & the public:

- Demonstrate wide support for affordable natural gas and renewable gas
- Highlight gas energy importance for California's households and businesses
- Communicate the role of both natural gas and renewable gas in protecting the environment
- Outline pitfalls and unintended consequences of relying solely on electricity as the only energy resource
- Emphasize need for balanced energy policies that maintain affordability, protect the environment, and preserve the consumers right to choose their energy usage for households and businesses





STRUCTURE

- **Non-Profit Organization that furthers a social welfare objective / 501c4**

- Not the same as a charitable organization (501c3)
- Significant difference between c3 and c4 is Advocacy*
 - 501c4 may engage in unlimited advocacy provided that all efforts support the purpose of the organization
 - Contributions to 501c4 are not deductible as philanthropic
 - Contributions to 501c4 MAY be deductible as business expense



*Please see tax advisor for guidance

- **Board of Directors**

- Statewide presence / Geographic diversity
- Industrial, commercial and residential interests
- 31 Members (see board packet for listing)





STAFF

- **Executive Director – Jon Switalski (See bio)**
 - Part-time ramping up to full-time
 - Legislative background
 - Energy Background



- **Marathon Communications (See insert - <http://www.marathon-com.com/>)**
 - 35+ years in Public Affairs
 - Communications strategy experts
 - Jim McDermott/Jorge Flores



- **Imprenta Communications (See insert – <http://www.icgworldwide.com/>)**
 - 20 years in Public Affairs
 - Communications outreach / Social media experts
 - Joe Zago/Mandy Xu



- **Kaufman Legal Group (See insert - <http://kaufmanlegalgroup.com/>)**
 - Campaign Finance Compliance
 - Election Law
 - Non-Profit Organization Law
 - Joe Guardarrama



BOARD



Officers

- Chair, Matt Rahn, Director, Environmental Leadership Institute/CSU San Marcos
- Vice Chair, Paul Granillo, CEO, Inland Empire Economic Partnership
- Treasurer, Gretchen Gutierrez, CEO, Desert Valleys Builders Association

Board Members

- Gerald "Jerry" Acosta, Sr. Nat'l Rep / Region V Utility Workers Union of America (UWUA)
- Michael Boccadoro, Executive Director, Agriculture Energy Consumers Association
- Robin Downs, President, Utility Workers Union of America (UWUA), Local 483
- Johannes Escudero, CEO/Executive Director, Coalition for Renewable Natural Gas
- Kirk Franks, CFO, MCA Clay Roof Tile
- Mitchell Frieder, Chef Instructor, Los Angeles Hospitality Training Academy
- Jeli Gavric, Legislative Advocate, California Association of Realtors

- Brett Guge, Executive Vice President, California Steel Industries
- John Hakel, Executive Director, Southern California Partnership for Jobs
- Matthew Hargrove, Sr. VP of Governmental Affairs, California Business Properties Association
- Hyepin Im, CEO, Faith and Community Empowerment
- Brad Jensen, Director-Public Policy, San Gabriel Valley Economic Partnership
- Bill La Marr, Executive Director, California Small Business Alliance
- Thomas Lawson, CEO, California Natural Gas Vehicle Coalition
- Ron Loveridge, Director, UC Riverside - Center for Sustainable Suburban Dev.
- Karen Norene Mills, Sr. Atty for Energy Policy, California Farm Bureau Federation
- George Minter, Regional Vice President, Southern California Gas Company
- Andy Molina, Executive Director, Southeast Churches Service Center
- Rob Neenan, CEO California League

of Food Producers

- Steve Olson, Director of Sustainability, Spreckels Sugar Company
- Jeff Orlandini, President, Pacific Die Casting
- Gary Passmore, Executive Director, Congress of California Seniors
- Brian Pulen, Sustainability Manager, Pechanga Resort and Casino
- Lilly Rocha, President, Latino Food Industry Association
- Leah Silverthorn, Policy Advocate, California Chamber of Commerce
- James Simonelli, Executive Director, California Metals Coalition
- Scott Wetch - California State Pipe Trades Council
- Hon. Steve Worthley (Retired) - Tulare County Board of Supervisors



WHY WE ARE HERE |

Natural Gas Under Attack



- **CPUC Moratorium Attempt**

December, 2017

- “...order Southern California Gas Company (SoCalGas) to implement an emergency moratorium on new commercial and industrial customer connections in areas of Los Angeles County...”
- Avoided after significant input from customers



- **AB3232 – Initial language proposed April 3, 2018**

- Establish the goal that new residential and nonresidential buildings built on or after January 1, 2030, should be **zero-greenhouse-gas-emission** buildings.
- Establish a strategy to achieve a reduction in the emissions of greenhouse gases by the state’s **residential and nonresidential building stock of 50 percent** below the 1990 levels by January 1, 2030.



WHY WE ARE HERE |

Natural Gas Under Attack



- **Integrated Energy Policy Report / California Energy Commission**

- Electrify all buildings
- Close Aliso Canyon in 10 years
- “...a new **prescriptive pathway** that makes it easier for builders to develop all-electric buildings that comply with the building code.”
- “...support the future development of **more stringent building codes** by developing market conditions that make the transition to code more feasible...”



- **Commissioner Picker to CA Assembly Utilities/Energy Committee**

- “To get to our GHG emission reduction goals (2030/2050) we can’t do it all with clean electricity. **We have to reduce the use of gas except in the most critical areas.**”





WHY WE ARE HERE |

Natural Gas Under Attack

- **Sierra Club Quotes in Regulatory Proceedings:**
 - “Gas is not a reliable, safe, or climate-friendly fuel source”
 - “Burning gas in buildings is incompatible with California’s long-term climate goals”
 - “Burning gas in buildings creates significant health, safety, and energy reliability problems”
 - “There is broad consensus that gas combustion in buildings must be phased out rapidly in order to meet the state’s climate change goals and satisfy its greenhouse gas reduction laws”
- LA Mayor Eric Garcetti - “And now is the time to start the beginning of the end of natural gas.”





STATUS OF C4BES

- Website live
 - Push information out
 - Webinars, emails, advocacy alerts
 - Collect information from polling
 - Advocacy tools (e.g. petitions)
- Members being recruited
 - SoCalGas push
 - Marathon Communications push
 - Social media push
 - C4BES Board of Directors push
- Media Roll-out plan developed
- Social media / digital plan developed



IMMEDIATE OPPORTUNITY



- California Public Utilities (CPUC) – Wants to electrify all CA buildings
 - Order Instituting Rulemaking (OIR) states the following
 - Title 24 building codes and Title 20 appliance standards, to support further building decarbonization
 - Need Gas User voices to weigh in
 - Party to the proceeding is important
 - Public does not understand potential impact

Preliminary Scoping Memo Procedural Schedule	Date
New OIR Issued	Mar 9
Opening Comments (no more than 25 pages)	Mar 11
Reply Comments (no more than 15 pages)	Mar 26
Prehearing Conference (PHC)	Q1 2019
Scoping Ruling	Q2 2019
Ruling on proposed approach to implement SB 1477	Q2 2019
Comments/Reply and Party alternative proposals to implement SB 1477	Q3 2019
Proposed Decision addressing SB 1477	Q4 2019
Resolve relevant issues	Within 3 years



**Attachment F - Screenshots of Metadata for Documents “C4BES Principles”
and “C4BES The Case”**

Redact ▾ Mark for Redaction ▾ Apply Properties Remove Hidden Information Sanitize Document

Remove Hidden Informat... X

Status:
Finding Hidden Information...Done

Results: (+) (-)

- ✓ C4BES The Case - FINAL.pdf
 - ✓ Metadata (1 item)
 - ✓ Document (1 item)
 - Show preview
 - Links, actions and javascr

Californians for Balanced Energy Solutions

The Case

California leads America's effort to reduce Greenhouse Gas (GHG) emissions with innovative policies that have achieved significant reductions. California households and businesses that support these policies include millions who rely on and enjoy the environmental and economic benefits derived from using Natural Gas (NG) and Renewable Natural Gas (RNG).

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Gas is the most efficient and affordable clean energy source available. Millions prepare their meals, heat their water, and heat their homes and businesses with gas. NG plays a crucial role in manufacturing, industrial, and agricultural processes. Compressed NG in heavy duty vehicles is cutting air pollution. And combined with RNG, a non-fossil fuel, produces the cleanest heavy-duty vehicles commercially available. And because it is significantly more affordable than other

C4BES The Case - FINAL.pdf

Description
Advanced

Description

Document Title:

Author: Mandy Xu

Author Title:

Description:

Description Writer:

Keywords:

Commas can be used to separate keywords

Copyright Status: Unknown

Copyright Notice:

Copyright Info URL:

Created: 10/2/2018 3:30:50 PM
Modified: 3/7/2019 12:16:28 PM
Application: Acrobat PDFMaker 15 for Word
Format: application/pdf

Powered By **xmp**

efficiently as it becomes widely employed.

makers and regulators along with some

eliminate the use of NG and RNG and

This year legislation was introduced in

constructed after 2030!

, is NOT the fastest or most efficient way

ense for every use or circumstance.

es the electric-only crusade is well-

ll be harmful, unintended consequences

or electricity) that best meets their needs.

123--\$388 annually; this will affect

re users to switch to costly electricity

feasible.

ir pollution by banning the use of

far cleaner and cheaper than

policy for California; one that will help

ewer impacts to residential, commercial

Document received by the CA 2nd District Court of Appeal.

Remove Hidden Informat... X

Status:
Finding Hidden Information...Done
Remove

Results:
C4BES Principles - FINAL.pdf
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Document (1 item)
Show preview
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Californians for Balanced Energy Solutions

Core Principles

Safe, reliable, and affordable energy is critical to California's economic and environmental well-being.

California households and businesses now have the ability to choose the type of energy that meets their specific needs. California voters overwhelmingly support energy choice.

C4BES Principles - FINAL.pdf

Description Advanced

Document Title: []

Author: Mandy Xu

Author Title: []

Description: []

Description Writer: []

Keywords: []

Commas can be used to separate keywords

Copyright Status: Unknown

Copyright Notice: []

Copyright Info URL: []

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Created: 10/1/2018 3:44:10 PM
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Format: application/pdf

Powered By xmp

OK Cancel

policies. The state should
energy can power California.

able, affordable, and
energy that meet California's

gher than the national
to choose between the
and with affordable, reliable
they do not have to choose.

must remain components of
o. They complement
d hydro-generated energy in
climate change.

Document received by the CA 2nd District Court of Appeal.

EXHIBIT B

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019

QUESTION 1:

Did SoCalGas use any ratepayer funding to support the founding and launch of Californians for Balanced Energy Solutions (C4BES)? If yes,

- a. Please give a full accounting of all ratepayer funding sources.
- b. Please give a full accounting of how any ratepayer funds were used.

RESPONSE 1:

Ratepayer funds have not been used to support the founding or launch of Californians for Balanced Energy Solutions (C4BES).

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019

QUESTION 2:

Does SoCalGas continue to use any ratepayer funding to support C4BES? If yes,
a. Please give a full accounting of all ratepayer funding sources.
b. Please give a full accounting of how any ratepayer funds were used.

RESPONSE 2:

Ratepayer funds are not used to support C4BES.

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019

QUESTION 3:

Please provide accounting of all SoCalGas staff who spent work hours on the founding, launch, and continued activities of C4BES.

- a. List all names of SoCalGas staff who spent work hours on C4BES activities.
- b. Provide an estimate of the number of hours spent on C4BES activities by each staff member listed in Question 3b.
- c. Provide the funding source(s) for all staff time, including specification of ratepayer or shareholder funding and the account the time was booked to (balancing account, shareholder account, GRC line item, etc.).

RESPONSE 3:

a. George Minter, Regional Vice President, External Affairs and Environmental Strategy; Ken Chawkins, Public Policy Manager.

b. For purposes of this response, “C4BES-related activities” refers to the “founding, launch, and continued activities of C4BES,” as queried in the question. From August 1, 2018 – December 31, 2018, George Minter spent approximately 2.5% of his time on C4BES-related activities, and Ken Chawkins spent approximately 10% of his time on C4BES-related activities. In 2019, through the date of this response, George Minter spent approximately 3 hours on C4BES-related activities, and Ken Chawkins spent approximately 10% of his time on C4BES-related activities.

c. The above-described time is shareholder funded (i.e., it is booked to a distinct invoice/order (I/O) that is not ratepayer funded).

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019

QUESTION 4:

Please provide all invoices and contracts to which SoCal Gas is a party for work which relates to the creation or support of C4BES. These include, but are not limited to contracts and invoices related to:

- a. Retention of **Imprenta Communications** in developing C4BES objectives and talking points.
- b. Compensation provided to C4BES board member Matt Rahn.

RESPONSE 4:

The attachments include Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

- a. SoCalGas does not have a direct contractual relationship with **Imprenta Communications** pertaining to C4BES. SoCalGas has a contractual relationship with **Marathon Communications Incorporated, who** contracts with **Imprenta Communications**. See the folder "Response 4A_Confidential Information" for responsive invoices through May 31, 2019 and underlying contract, as amended from time to time. **Marathon Communications Incorporated** has performed and continues to perform routine services for SoCalGas outside of those performed with respect to C4BES. To account for all the work done on behalf of C4BES, fifty-percent of each invoice is booked to the invoice/order referenced in the response to Question 3.c above, i.e., fifty-percent of each responsive invoice is not ratepayer funded.
- b. Matt Rahn volunteers his time as C4BES' Chair. Neither Rahn nor the organizations with which he is affiliated have received any funding from SoCalGas as compensation for his work with C4BES.

Document received by the CA 2nd District Court of Appeal.

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019

QUESTION 5:

For each invoice and contract provided in response to Question 5, identify:

- a. Whether ratepayer or shareholder funded (and proportions if necessary)
- b. The funding source used (e.g. GRC funds, specific balancing accounts, etc.).

RESPONSE 5:

SoCalGas interprets the question to refer to the documents and responses provided in response to Question 4 (rather than Question 5). With the following understanding, SoCalGas responds as follows:

- a. As noted in response to Question 4 above, the invoices provided reflect both routine work done for SoCalGas as well as some work done on behalf of C4BES. As such, in order to fully account for the work done for C4BES, fifty-percent of each invoice is funded by shareholders as described in response to Question 3.c. The remaining fifty-percent of each invoice is funded as described in response to Question 5.b.
- b. The ratepayer-funded portion of each invoice is billed to the internal Cost Center 2200-2441 in SoCalGas' General Rate Case.

Document received by the CA 2nd District Court of Appeal.

EXHIBIT C

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

In response to Questions 1 and 2 of SK-SCG-2019-01, SoCalGas states “[t]he consultant’s work is shareholder funded.” The “consultant’s work” is in reference to the approximately \$10,000 in consultant charges identified in SoCalGas’ response to Questions 3 and 4 of HB-SCG-2019-13.

QUESTION 1:

1. Has the referenced “consultant’s work” always been booked to shareholder funded accounts?
 - a. Please provide all journal entries for the referenced consultant contract showing the account charged and any transfers of charges between accounts.

RESPONSE 1:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant’s work is shareholder funded. The information requested would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas’ and other’s constitutional rights. See e.g., *NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. Subject to the above, and without waiving its objection, SoCalGas responds as follows:

Although the consultant charges have always been charged to the Balanced Energy internal order (IO) and the intent in setting up that IO was that it be shareholder funded, due to an inadvertent accounting error, the balanced energy IO was not initially properly designated as a shareholder account. That error was identified and fixed. See the response to question 4.

Journal entries related to the consultant charges are below. There were \$474.16 in expenses paid to the consultant related to the same scope of work. Through an inadvertent error, the consultant was paid two \$10,000 payments. SoCalGas is endeavoring to recover the second \$10,000 payment from the vendor and the amount has been removed to a receivable account. Pursuant to its objection, SoCalGas has not provided the vendor name in the first screenshot.

Posting Date	Ref. document number	Order	Cost Element	Cost element name	Val/COArea Crcy	Aux. acct assignment_1	Offsetting acct no
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SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

9/5/2019	1901415826	300796601	6220600	SRV-CONSULTING-OTHER	10,000.00	CTR 2200-2204		
10/1/2019	1901419493	300796601	6220600	SRV-CONSULTING-OTHER	474.16	CTR 2200-2204		
10/1/2019	1901419500	300796601	6220600	SRV-CONSULTING-OTHER	10,000.00	CTR 2200-2204		
Posting Date	Ref. document number	Order	Cost Element	Cost element name	Val/COArea Crcy	Aux. acct assignment_1	Offsetting acct no.	Name
2/5/2020	10015014	300796601	6220600	SRV-CONSULTING-OTHEI	-10,000.00	CTR 2200-2204	4999969	Transfer to Correct Acct.

Document received by the CA 2nd District Court of Appeal.

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

Question 2 of SK-SCG-2019-01 requests SoCalGas to provide any and all documentary evidence that the above referenced consultant costs were charged to shareholders. In response to Question 2 of SK-SCG-2019-01, SoCalGas provides a screenshot of a table labeled “Display Invoice 1766820 (1/3),” and SoCalGas states “The consultant charges were charged to IO 30076601, Balanced Energy, which is shareholder funded.”¹

QUESTION 2:

Please provide any and all documentary evidence that the cost of the \$10,000 were charged to shareholders.

RESPONSE 2:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant’s work is shareholder funded. The information requested would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas’ and other’s constitutional rights. See *e.g.*, *NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. SoCalGas objects to this request as overbroad in seeking “any and all documentary evidence.” Subject to the above, and without waiving its objection, SoCalGas responds as follows:

Please see SoCalGas’ Response to Question 2 of SK-SCG-2019-01. In addition, please see the below regarding the \$474.16 in expenses, which were charged to the Balanced Energy IO. The second \$10,000 was also charged to the Balanced Energy IO and SoCalGas is seeking repayment of that amount by the vendor. Pursuant to its objection, SoCalGas has redacted the vendor name, vendor ID, and the description of the activity.



¹ The correct IO is 300796601. (Emphasis added.)

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

G/L Account	6220600	<input type="checkbox"/> V-CONSULTING-OTHER
Company Code	2200	Southern California Gas
		Doc. no. 1901419500
Line Item 2 / Debit entry / 40		
Amount	10,000.00	USD
Tax Code	I0	
Tax Jur.	CALOSCNTYLOS	
Additional Account Assignments		
Business Area	3000	
Cost Center	2200-2204	
	Order	300796601
	Plant	
Purchasing Doc.		0
Quantity	0.000	
Assignment	20191001	
Text		Long text

G/L Account	6220600	<input type="checkbox"/> V-CONSULTING-OTHER
Company Code	2200	Southern California Gas
		Doc. no. 1901419493
Line Item 2 / Debit entry / 40		
Amount	474.16	USD
Tax Code	I0	
Tax Jur.	CALOSCNTYLOS	
Additional Account Assignments		
Business Area	3000	
Cost Center	2200-2204	
	Order	300796601
	Plant	
Purchasing Doc.		0
Quantity	0.000	
Assignment	20191001	
Text		Long text

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

G/L Account	6220600	<input type="checkbox"/> V-CONSULTING-OTHER
Company Code	2200	Southern California Gas
		Doc. no. 1901415826
Line Item 2 / Debit entry / 40		
Amount	10,000.00	USD
Tax Code	I0	
Tax Jur.	CALOSCNTYCNT	
Additional Account Assignments		
Business Area	3000	
Cost Center	2200-2204	Order 300796601
		Plant <input type="text"/> 
Purchasing Doc.	<input type="text"/> 0	
Quantity	0.000	
Assignment	20190905	
Text		

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 3:

Please provide any and all documentary evidence that the \$10,000 was the full amount of the charges associated with the consultant's work.

RESPONSE 3:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant's work is shareholder funded. The information requested would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas' and other's constitutional rights. See e.g., *NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. SoCalGas objects to this request as overbroad in seeking "any and all documentary evidence." Subject to the above, and without waiving its objection, SoCalGas responds as follows:

Through an inadvertent error, the consultant was paid two \$10,000 payments. SoCalGas is endeavoring to recover the second \$10,000 payment from the vendor. There were also \$474.16 in expenses paid to the consultant related to the same scope of work.

Vendor		[REDACTED]																	
Company Code		2200																	
Name		[REDACTED]																	
City		[REDACTED]																	
St	Account	CoCd	Type	DocumentNo	Reference	Doc..Date	Amount in local cur.	PBk	Assignment	Pstng Date	Entry Date	Check number	PayT	Blinc Date	Pmnt date	Rate			
		2200	KR	1901415826	INV-000062	08/28/2019	10,000.00-			09/05/2019	09/05/2019	2008386	ND00	08/28/2019	08/28/2019	09/11			
		2200	KS	1901419493	INV-000064	09/04/2019	474.16-			10/01/2019	10/01/2019	2020703	ND30	09/27/2019	10/27/2019	11/04			
		2200	KS	1901419500	000062	08/28/2019	10,000.00-			10/01/2019	10/01/2019	2020703	ND30	09/27/2019	10/27/2019	11/04			
		2200					20,474.16-												
		2200					20,474.16-												
Vendor		*																	
Company Code		*																	
Name		*																	
City		*																	
St	Account	CoCd	Type	DocumentNo	Reference	Doc..Date	Amount in local cur.	PBk	Assignment	Pstng Date	Entry Date	Check number	PayT	Blinc Date	Pmnt date	Rate			
							20,474.16-												

Document received by the CA 2nd District Court of Appeal.

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 4:

Please provide any and all documentary evidence that charges to IO 30076601 are shareholder funded.

RESPONSE 4:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant’s work is shareholder funded. The information requested would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas’ and other’s constitutional rights. See e.g., *NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. SoCalGas objects to this request as overbroad in seeking “any and all documentary evidence.” Subject to the above, and without waiving its objection, SoCalGas responds as follows:

See response to question 5. The Balanced Energy internal order (IO) 300796601 was created in March 2019 for tracking all costs associated with Balanced Energy activities and the intent was to make it a shareholder funded IO. However, an incorrect settlement rule was set up for this IO to FERC 920.0 A&G Salaries, consequently, the costs initially settled to the incorrect FERC account. On September 21, 2019, the SoCalGas Accounting Controller and Accounting Director met with the Strategy, Engagement & Chief Environmental Officer, and confirmed that the Balanced Energy activities should be classified as FERC 426.4 - Expenditures-Civic & Related Activities/Lobbying Costs.

The settlement rule was corrected on October 30, 2019 with an effective date of November 1, 2019. Accounting booked retroactive adjustments in November and December 2019 to correct the FERC account balances.

Order	300796601		BALANCED ENERGY									
Plan settlement	Version		2		Plan version 2 - FERC Dist							
Plan - Settlement Rules												
Cat	Settlement Receiver	Receiver Short Text	%	Equivalence no.	Sett...	No.	From...	From ...	To P..	To Fisc...	First Used	Last Used
CTR	F920000G	A&G SALARIES	100.00	0	PER	1	3	2019	9	2019	009/2019	009/2019
CTR	F426400G	EXP-CIVIC & RELATED	100.00	0	PER	2	10	2019	16	9999	012/2019	012/2019

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

Order	300796601		BALANCED ENERGY									
Plan settlement			Version	2	Plan version 2 - FERC Dist							
Plan - Settlement Rules												
Cat	Settlement Receiver	Receiver Short Text	%	Equivalence no.	Sett...	No.	From...	From ...	To P...	To Fisc...	First Used	Last Used
CTR	F920000G	A&G SALARIES	100.00	0	PER	1	3	2019	9	2019	009/2019	009/2019
CTR	F426400G	EXP-CIVIC & RELATED	100.00	0	PER	2	10	2019	16	9999	012/2019	012/2019

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 5:

Please describe in narrative form how SoCalGas accounts for, tracks, and distinguishes shareholder funded IOs and ratepayer funded IOs.

RESPONSE 5:

During the development of the general rate case (GRC) forecasts, it is sometimes necessary to remove incurred costs so that ratepayers are not funding activities that should be borne by shareholders. There are three main ways that SoCalGas is able to do this for internal orders. The first way is the FERC account that the internal order settles to. Certain FERC accounts such as 426.4 are automatically excluded from the financial information provided to the GRC teams for analysis. Secondly, all internal orders associated with a regulatory account are assigned a unique refundable code. For example, non-GRC refundable programs such as Energy Efficiency are assigned a unique refundable code so that it may be automatically excluded from the financial information provided to the GRC teams for analysis. Third, specific internal orders associated with activities that should be excluded from the GRC may be separately identified by specific internal order number as in the case of the Aliso Incident related expenses that were removed from the TY2019 GRC as ordered by the TY2016 GRC Final Decision (D.) 16-06-054, Ordering Paragraph (OP) 12.

Document received by the CA 2nd District Court of Appeal.

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 6:

Please provide any and all documentary evidence that shows SoCalGas will not seek to recover charges made to IO 30076601 in the next General Rate Case.

RESPONSE 6:

SoCalGas objects to this request as overbroad in seeking “any and all documentary evidence.” Subject to the above, and without waiving its objection, SoCalGas responds as follows:

See responses to questions 4 and question 5. The Balanced Energy IO has a FERC designation that will result in its automatic exclusion from the financial information provided to the GRC teams for analysis in its next General Rate Case. SoCalGas will not seek to recover charges made to IO 300796601 in the next General Rate Case.

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 7:

Was the invoice for the “consultant’s work” matched to a purchase order?
a. If yes, please provide the purchase order.

RESPONSE 7:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant’s work is shareholder funded. The information requested would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates and chill the exercise of SoCalGas’ and other’s constitutional rights. See e.g., *NAACP v. Alabama* (1958) 357 U.S. 449, 462; *Perry v. Schwarzenegger* (9th Cir. 2010) 591 F.3d 1147, 1160. The appropriateness of the disclosure of this information is the subject of an appeal being reviewed by the full Commission. Subject to the above and without waiving its objections, SoCalGas responds as follows:

No, the invoice for the consultant’s work was not matched to a purchase order.

Document received by the CA 2nd District Court of Appeal.

SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALADVOCATES-SK-SCG-2020-01)
DATE RECEIVED: JANUARY 24, 2020
DATE SUBMITTED: FEBRUARY 7, 2020

QUESTION 8:

Please provide the name(s) and title(s) of the SoCalGas employee who signed the contract with the consultant on SoCalGas' behalf.

RESPONSE 8:

SoCalGas objects to this request as seeking information that is outside the statutory authority delegated to the Public Advocates Office by Pub. Util. Code §§ 309.5 and 314. The consultant's work is shareholder funded. Subject to the above, and without waiving its objections, SoCalGas responds as follows:

There was not a written contract between SoCalGas and the consultant.

EXHIBIT D

**PACIFIC GAS AND ELECTRIC COMPANY
 Net Energy Metering-Successor Tariff OIR
 Rulemaking 20-08-020
 Data Response**

PG&E Data Request No.:	CalAdvocates_013-Q02		
PG&E File Name:	NetEnergyMetering-SuccessorTariffOIR_DR_CalAdvocates_013-Q02		
Request Date:	April 26, 2021	Requester DR No.:	013
Date Sent:	May 7, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:	N/A	Requester:	Benjamin Gutierrez

SUBJECT: NEM COALITION FUNDING SOURCE AND PARTY PROPOSAL

QUESTION 02

Please interpret "funded" as broadly as possible, to include monetary or utility facilities support in any amount or quantity, using either ratepayers or shareholder dollars. If the answer to question 1 is yes, then please identify each account to which any portion of the coalition costs were charged:

- a. State the account name and cost center number.
- b. State whether the account is ratepayer funded.
- c. State how much was charged to the account.

ANSWER 02

Costs associated with this coalition are funded by shareholders and are thus beyond the scope of this proceeding.

Document received by the CA 2nd District Court of Appeal.

Southern California Edison
R.20-08-020 – NEM OIR

DATA REQUEST SET Cal Advocates - SCE - 012

To: Cal Advocates
Prepared by: Andre Ramirez
Job Title: Sr Advisor
Received Date: 4/26/2021

Response Date: 5/10/2021

Question 01-02:

1. Has SCE funded the creation and/or activities of the “Affordable Clean Energy for All” coalition?
2. Please interpret "funded" as broadly as possible, to include monetary or utility facilities support in any amount or quantity, using either ratepayers or shareholder dollars. If the answer to question 1 is yes, then please identify each account to which any portion of the coalition costs were charged:
 - a. State the account name and cost center number.
 - b. State whether the account is ratepayer funded.
 - c. State how much was charged to the account.

Response to Question 01-02:

No. Edison International, SCE’s parent, has provided financial support for the Affordable Clean Energy for All coalition.

Costs associated with this coalition are funded by shareholders and is thus beyond the scope of this proceeding.

**PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021**

1. Has SDG&E funded the creation and/or activities of the “Affordable Clean Energy for All” coalition?

SDG&E Response:

Yes, SDG&E has provided financial support for the Affordable Clean Energy for All coalition.

Document received by the CA 2nd District Court of Appeal.

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021

2. Please interpret "funded" as broadly as possible, to include monetary or utility facilities support in any amount or quantity, using either ratepayers or shareholder dollars. If the answer to question 1 is yes, then please identify each account to which any portion of the coalition costs were charged:
 - a. State the account name and cost center number.
 - b. State whether the account is ratepayer funded.
 - c. State how much was charged to the account.

SDG&E Response:

Costs associated with this coalition are funded by shareholders and is thus beyond the scope of this proceeding.

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021

3. In D.20-08-001 setting standardize inputs and assumptions for estimating bill savings of residential PV systems, the Commission directs the utilities to collect at least 100 Contractor State Licensing Board (CSLB) disclosure documents from solar vendors and installers each year as part of the utilities' semi-annual audit process. The Commission also requires the utilities to collect all inputs and assumptions that solar vendor/installers use to estimate bill savings in their disclosure documents.
 - a. Has SDG&E collected any CSLB disclosure documents from solar vendors and installers yet?
 - b. Please provide all CSLB disclosure documents that SDG&E has collected so far, including all inputs and assumptions that solar vendors/installers used to develop their bill savings estimates.

SDG&E Response:

No, since D.20-08-001, SDG&E has yet to collect CSLB disclosure documents from solar vendors and installers. Per D.20-08-001, SDG&E's collection of CSLB disclosure documents is contingent upon Commission staff providing notice to the R.14-07-002 service list that the Contractors State Licensing Board disclosure document has been amended. This notice remains pending.

Document received by the CA 2nd District Court of Appeal.

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021

4. Please provide the aggregate hourly consumption profile (Channel 1 meter readings) and the total number of customers of the following rate schedules for the most recent year the data is available:
- a. EV-TOU
 - b. EV-TOU-2
 - c. EV-TOU-5

SDG&E Response:

Please refer to the file titled ‘CalPA_DR14_EV876.’ SDG&E has included both channels of interval data, since this population has very high NEM penetration. Data is for 2019.



CalPA_DR14_EV876
0s.xlsx

PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021

5. In its party proposal, SDG&E proposes that successor tariff customers should only be able to net their export credits at the full export compensation rate (ECR) against their billed charges within the same time-of-use (TOU) period and within the same month and only up to the point where total net exports (kWh) equals total consumption (kWh) in the TOU period. SDG&E proposes that exports compensation for any net exports that exceed consumption during a monthly TOU period would be compensated at the net surplus compensation (NSC) rate, or wholesale market rates, at the end of each month.
- a. What is the reduction in residential successor tariff customers' total exports compensation in 2022 on a total dollars basis and a percentage basis comparing 1) net billing with SDG&E's proposed export compensation rates (ECR) allowing customers to be compensated for all net exports at SDG&E's proposed ECR and to carry over excess credits until the annual net surplus compensation true-up, and 2) net billing with SDG&E's proposal to limit netting with the same TOU period within the same billing cycle (and only up to the kWh consumption during each TOU period) with the true-up occurring at end of each billing cycle? Please provide total annual exports compensation under both proposals, as well as the difference between the two.
 - b. What is the reduction in the total annual 2022 successor tariff cost shift on a total dollars basis and a percentage basis comparing SDG&E's proposal with and without the proposed requirement to limit netting within the same monthly TOU period and to perform the true-up at the end of each month? In other words, what is the difference in the 2022 cost shift comparing a proposal that is identical to SDG&E's except that all net exports would be compensated at the ECR and customers could carry forward their excess ECR credits until an annual true-up and SDG&E's proposal as outlined above.
 - i. What is the reduction in the annual 2022 residential successor tariff cost shift on a dollars and percentage basis performing the same comparison as in part b?

SDG&E Response:

- a. The total annual export compensation under SDG&E's proposed ECR, with carry over of excess credits until the annual net surplus compensation true-up, is \$366. Under SDG&E's proposed ECR and netting and true-up periods, the total export compensation is \$317. There is a 13% or \$49 difference between the two proposals. SDG&E assumed a flat net surplus compensation of \$0.035/kWh for this analysis. The illustrative customer used for this analysis exports 60% of generation and has a 7kW system size that generates 90% of the customer's annual load. SDG&E believes results of this analysis could vary significantly for a customer who has oversized their system and is a net exporter.
- b. The difference in the 2022 cost shift comparing a proposal that is identical to SDG&E's except that all net exports would be compensated at the ECR and customers could carry forward their excess ECR credits until an annual true-up and SDG&E's proposal is \$7.00/kW, or a 1.58% reduction. This analysis is for a net import customer where the system

**PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021**

produces 90% of the customer’s total annual load. SDG&E believes the results could be much more significant for customers who have oversized their system.

6. Please provide the 2020 Integrated Energy Policy Report (IEPR) Mid-Mid demand case of forecasted cumulative distributed PV capacity (MW) for the years 2019-2030, broken out between residential and non-residential PV capacity.

SDG&E Response: Please see Table 1 below for CEC’s 2020 IEPR Mid demand case of forecasted cumulative distributed PV capacity for years 2019 – 2030. The CEC’s IEPR forecast includes capacity for certain customers that are not NEM. As of March 2021, 57.7 MW of SDG&E’s installed capacity is RES-BCT and Rule 21 non-Export customers that are not compensated at retail rates, so that capacity is excluded from SDG&E’s cost shift forecasts. Table 2 adjusts the IEPR forecast in Table 1 to exclude RES-BCT and Rule 21 non-Export customer distributed PV capacity for years 2021-2030.

Table 1:

Unadjusted IEPR 2020 mid-demand - installed PV (MW)		
Year	Res	Non-Res
2019	951	298
2020	1,101	333
2021	1,273	367
2022	1,387	397
2023	1,495	429
2024	1,587	463
2025	1,665	499
2026	1,729	537
2027	1,782	576
2028	1,827	617
2029	1,863	660
2030	1,894	703

Document received by the CA 2nd District Court of Appeal.

**PUBLIC ADVOCATES OFFICE DATA REQUEST
 CALPA-SDGE-DR-14
 NET ENERGY METERING REFORM OIR – R.20-08-020
 SDG&E RESPONSE
 DATE RECEIVED: APRIL 26 2021
 DATE RESPONDED: MAY 11, 2021**

Table 2:

Adjusted IEPR 2020 mid-demand - installed PV (MW)		
Year	Res	Non-Res
2019	951	298
2020	1,101	333
2021	1,273	310
2022	1,387	339
2023	1,495	371
2024	1,587	405
2025	1,665	441
2026	1,729	479
2027	1,782	519
2028	1,827	560
2029	1,863	602
2030	1,894	645

Document received by the CA 2nd District Court of Appeal.

**PUBLIC ADVOCATES OFFICE DATA REQUEST
CALPA-SDGE-DR-14
NET ENERGY METERING REFORM OIR – R.20-08-020
SDG&E RESPONSE
DATE RECEIVED: APRIL 26 2021
DATE RESPONDED: MAY 11, 2021**

7. Table 18 on page 37 of your party’s proposal includes the total funding and projected enrollment of programs dedicated to increasing access to renewable energy for low-income ratepayers. Please provide the sources and any workbooks or calculations used to arrive at these funding and enrollment projections.

SDGE Response:

Please see SDG&E’s response to Cal Advocates Data Request 6, subpart (b) for values used to develop the low-income funding and enrollment projections.