

**SOUTHERN CALIFORNIA GAS COMPANY**  
**(DATA REQUEST CALADVOCATES-SC-SCG-2019-05)**

**Date Received: August 13, 2019**

**Date Submitted: August 27, 2019**

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**Preliminary Statement:** SoCalGas has made a good faith effort to respond fully to all the questions posed in this data request. However, many of the questions are premised on an understandable lack of familiarity with SoCalGas' accounting systems, practices, and procedures. These systems, practices, and procedures are difficult to describe in response to written questions; as such, SoCalGas welcomes the opportunity to meet with Cal Advocates to describe and discuss these and related matters.

**QUESTION 1:**

Provide the "Political Activities Policy" referenced in the *CAU Approval and Commitment Policy* provided in SoCalGas' response to Question 2 of SC-SCG-2019-04.

**RESPONSE 1:**

See attached policy titled Political Activities Policy.

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**QUESTION 2:**

Provide the “Procurement Policy” referenced in the CAU Approval and Commitment Policy provided in SoCalGas’ response to Question 2 of SC-SCG-2019-04.

**RESPONSE 2:**

See the attached policy titled Procurement Policy.

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**QUESTION 3:**

Provide the Excel workbook titled "IO\_Form\_503.xls," referenced on the Work Order Authorization (WOA) provided in SoCalGas' response to Question 1 of SC-SCG-2019-04.

**RESPONSE 3:**

The reference to excel file "IO\_Form\_503.xls" is the excel filename for the Work Order Authorization form template.

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**QUESTION 4:**

Provide all WOAs or Authorizations of Expenditure (AFE) which controlled Standard Services Agreement No. 5660052135 (between SoCalGas and Marathon Communications) prior to the WOA provided in SoCalGas' response to Question 1 of SC-SCG-2019-04.

**RESPONSE 4:**

No other WOAs or AFEs are related to Standard Services Agreement No. 5660052135.

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**QUESTION 5:**

Does SoCalGas consider the WOA which created the BALANCED ENERGY IO to be Ordinary course of business (OCB) or “base business” as defined in the CAU Approval and Commitment Policy?

- a. If so, explain why this designation is appropriate.
- b. Include any documentation used to support this designation.

**RESPONSE 5:**

Yes.

- a. The Approval and Commitment Policy establishes standards for the authorization to enter into commitments and for the approval of cash disbursements and to execute other documents necessary to carry out the commitments on behalf of SoCalGas. Ordinary course of business or base business in that policy references the usual transactions that are ratepayer funded, but base business need not necessarily be ratepayer funded; it can also be shareholder funded. SoCalGas deems the activities included in the Balanced Energy IO to be ordinary course of business or base business, and the Balanced Energy IO is fully shareholder funded.
- b. SoCalGas objects to this request as vague, ambiguous, overly broad, unduly burdensome and intrusive pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas is not aware of any responsive documentation that specifically pertains to the WOA that created the Balanced Energy IO other than the WOA itself.

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**QUESTION 6:**

Does SoCalGas consider the WOA which created the BALANCED ENERGY IO to be “Not in ordinary course of business, incremental projects or non-base business” as defined in the CAU Approval and Commitment Policy?

- a. If so, explain why this designation is appropriate.
- b. Include any documentation used to support this designation.

**RESPONSE 6:**

SoCalGas does not consider the WOA which created the Balanced Energy IO to be “not in the ordinary course of business, incremental projects or non-base business” as defined in the CAU Approval and Commitment Policy. Please refer to the response to Question 5.

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**QUESTION 7:**

Does SoCalGas consider the founding and continued financial support of C4BES and activities related to C4BES to be base business?

- a. Explain why this designation is appropriate.
- b. Identify the elements of the CAU Approval and Commitment Policy apply to designation.

**RESPONSE 7:**

Yes.

- a. As a preliminary matter, please refer to the response to Question 5, which indicates that base business need not be ratepayer funded (and, in this case, the Balanced Energy IO is not ratepayer funded). The designation of this support as base business is appropriate because the funds are used to support an organization which represents the interests of our customers.
- b. Please refer to response to Question 5.

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**QUESTION 8:**

Provide all contracts (and contract amendments) covered by the WOA which created the BALANCED ENERGY IO.

**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. The Balanced Energy IO is shareholder funded, not ratepayer funded. Thus, knowing this information will not assist the Public Advocates Office in performing its statutory duties.

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**QUESTION 9:**

Were all policies and procedures as described in the *CAU Approval and Commitment Policy* followed in regard to the creation, maintenance and execution of the WOA which created the BALANCED ENERGY IO?

- a. Provide any and all internal audits or other documentation regarding internal review of the accounting and documentation regarding the WOA provided in response to Question 1 of SC-SCG-2019-04.

**RESPONSE 9:**

Yes; the copy of the WOA provides evidence of internal approvals to open the internal order in accordance with SoCalGas' policies.

- a. No additional responsive documents exist.

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**QUESTION 10:**

Were all invoices SoCalGas received from Marathon Communications in 2018 and 2019 reviewed in a manner consistent with all policies and procedures as described in the *CAU Approval and Commitment Policy*.

**RESPONSE 10:**

Yes.

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**QUESTION 11:**

Were any reviews as described on page 6 of the CAU Approval and Commitment Policy performed for the WOA which created the BALANCED ENERGY IO?

- a. If reviews were performed, provide all review documentation as described in the CAU Approval and Commitment Policy.
- b. Explain why, or why not, a Technical/Economic Review was performed. Explain why, or why not, the Internal Review Checklist was completed.

**RESPONSE 11:**

No. The additional review and approval requirements referenced on page 6 are not applicable to this WOA. All necessary approvals of the work order are evidenced on the WOA.

- a. Not applicable.
- b. A Technical/Economic Review and related Internal Review Checklist was not required in accordance with the Approval and Commitment Policy.

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**QUESTION 12:**

Was Board approval obtained for the WOA which created the BALANCED ENERGY IO?

- a. If yes, on what date was approval obtained?
- b. Provide all documents provided to the board as part of the board approval.

**RESPONSE 12:**

SoCalGas Board approval was not required in accordance with the Approval and Commitment Policy.

- a. Not applicable.
- b. Not applicable.

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**QUESTION 13:**

Is nonrefundable O&M ratepayer funded?

**RESPONSE 13:**

SoCalGas objects to this question as being vague, ambiguous, and overly broad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas understands this request to pertain to the Balanced Energy IO. The costs and activities tracked by the Balanced Energy IO are not funded by ratepayers.

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**QUESTION 14:**

Provide screenshots of the Purchase Order (PO) that controls Agreement No. 5660052135 (between SoCalGas and Marathon Communications) in the accounting system SAP. The screenshots should include the full content of the window with all content fully legible. If separate tabs exist within the PO, separate screenshots displaying the contents of each tab should be included. Submit all screenshots for the PO in one .pdf document.

**RESPONSE 14:**

The attachment includes Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023.

Please see attached document "PO Screenshots."

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**QUESTION 15:**

If a PO distinct from the PO referenced in Question 13 has previously controlled Agreement No. 5660052135 (between SoCalGas and Marathon Communications), provide screenshots in the same manner as requested in Question 13. If applicable, provide one .pdf document for each PO.

**RESPONSE 15:**

We understand this question to intend to refer to Question 14 and respond on that basis. No other POs have controlled Agreement No. 5660052135.

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**QUESTION 16:**

Provide documentation that clearly indicates SoCalGas' intent has always been that work and expenses related to founding and supporting the organization that came to be known as Californians for Balanced Energy Solutions should be fully shareholder funded. The document should be dated and consistent with SoCalGas' response to Question 6 of SC-SCG-2019-02 (i.e.: dated late 2017 – early 2018). If no such documentation exists, please state that no documentation exists to substantiate the claim that it was always SoCalGas' intent that work and expenses related to founding and supporting the organization that came to be known as Californian for Balanced Energy Solutions should be shareholder funded.

**RESPONSE 16:**

SoCalGas is not aware of any non-privileged responsive documentation.

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**QUESTION 17:**

The following questions refer to the WOA provided in response to Question 1 of SC-SCG-2019-04:

- a. What does the check mark in the box next to “O&M” signify (upper right hand corner of the document?)
- b. What does the handwritten number “28322.000” in the upper right hand corner signify?
- c. What does the number “\$30M” below the signature of Sharon Tomkins signify?
- d. On what date did Sharon Tomkins sign the WOA?
- e. Was the WOA prepared 3/31/2019 revised at any point after March 28, 2019?
  - i. If yes, please provide the revised document, along with any documents included in the preparation and review of the revised WOA.
  - ii. If no, please provide all relevant documents providing accounting instruction to have invoices and costs recorded after 6/14/2019 booked to shareholder funded accounts on a going-forward basis.

**RESPONSE 17:**

The copy of the completed and approved WOA includes notations from the accountant who processed the WOA requisition.

- a. The check mark in the box next to “O&M” signifies that the WOA is for O&M costs.
- b. This number represents the work order number assigned to this project.
- c. This notation indicates the authorization limit that Sharon Tomkins has as a Vice President of SoCalGas. The authority level is documented within the Approval and Commitment policy.
- d. Accounting received the form from Sharon Tomkins’ office on March 28, 2019 as indicated by the stamp on the WOA.
- e. SoCalGas understands this question to intend to refer to the date 3/21/2019 rather than 3/31/2019 and responds on that basis. There was no revision to the WOA after March 28, 2019.
  - i. Not applicable.
  - ii. SoCalGas is not aware of the existence of any responsive documents.

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**QUESTION 18:**

What audit or compliance plan does the Sempra board have in reviewing charges intended to be recovered from shareholders.

**RESPONSE 18:**

Not applicable. The Sempra board is not reviewing these charges.

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**QUESTION 19:**

Provide the initial WOA under which the initial Marathon contract (Contract Agreement 5660052135, which started January 26, 2018) was authorized.

- a. Provide all documentation associated with the initial WOA.
- b. If there is no WOA associated with Contract Agreement 5660052135, prior to the WOA prepared on 3/21/2019, please indicate that none exists, and provide an explanation of how the lack of a WOA prior to 3/21/2019 is consistent with SoCalGas' CAU Approval and Commitment Policy.

**RESPONSE 19:**

A WOA was not created for the initial authorization of Contract Agreement 5660052135 as the Approval and Commitment Policy does not require a WOA to exist in order to enter into an agreement for professional services (i.e., O&M).

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**QUESTION 20:**

Provide a list of all journal entries made to remove any charges from Responsible Cost Center 2200-2204 from March 1, 2019 through the date of this data request. For each item, please indicate:

- a. The date the journal entry was executed.
- b. The name and title of the SoCalGas employee who authorized the instruction to make the journal entry.
- c. If that journal entry moved the charge to a shareholder funded account or not.
- d. Identifying information regarding the charge (including, but not limited to, invoice number and Contract Agreement number, employee charged time)

**RESPONSE 20:**

No journal entries were made to remove charges from responsible cost center 2200-2204 from March 1, 2019 through the date of this data request.

- a. Not applicable.
- b. Not applicable.
- c. Not applicable.
- d. Not applicable.

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**QUESTION 21:**

Provide a list of all journal entries made to remove any charges from the “ENERGY POLICY and STRATEGY team” from March 1, 2019 through the date of this data request. For each item, please indicate:

- a. The date the journal entry was executed.
- b. The name and title of the SoCalGas employee who authorized the instruction to make the journal entry.
- c. If that journal entry moved the charge to a shareholder funded account or not.
- d. Identifying information regarding the charge (including, but not limited to, invoice number and Contract Agreement number, employee charged time).

**RESPONSE 21:**

The Energy Policy and Strategy team charges their labor and non-labor charges to cost center 2200-2204. Please see response to Question 20.

- a. Not applicable.
- b. Not applicable.
- c. Not applicable.
- d. Not applicable.