**CPUC Docket No. A.22-05-015/016**

Application of SoCalGas for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024/Application of SDG&E for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024

**CEJA Data Request CEJA-Sempra-02**

**To:** Sharon Cohen, on behalf of SDG&E/SoCalGas, [SLCohen@sdge.com](mailto:SLCohen@sdge.com)

Elliott Henry, on behalf of SDG&E/SoCalGas, [EHenry@socalgas.com](mailto:EHenry@socalgas.com)

**From:** Matt Vespa, Earthjustice, on behalf of CEJA, [mvespa@earthjustice.org](mailto:mvespa@earthjustice.org)

Sara Gersen, Earthjustice, on behalf of CEJA, [sgersen@earthjustice.org](mailto:sgersen@earthjustice.org)

**Date Sent:** July 25, 2022

**Response Due:** August 8, 2022

Exh. SCG-04 at MAA-85:6-8 states that “BasedFirst Set of Data Requests (CEJA-Sempra-02) propounded by the California Environmental Justice Alliance (“CEJA”) no later than August 8, 2022 via email or, if voluminous, flash drive by mail.

Please provide all email responses to the individuals representing CEJA listed above. Responses via postal mail can be sent only to Matt Vespa. **Please notify Matt Vespa before sending any responses by postal mail, as our offices are currently closed.**

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

This data request seeks information relating to A.22-05-015/016, the Applications of SoCalGas and SDG&E for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024. CEJA reserves the right to submit further data requests.

**GENERAL INSTRUCTIONS**

The following general instructions apply to all data requests propounded by CEJA on SoCalGas and SDG&E 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**

1. 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.
2. As used herein, the term “SDG&E” is used to refer to San Diego Gas & Electric 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.
3. 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.
4. 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.
5. 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.
6. 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.
7. “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.
8. 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.

**CEJA SECOND SET OF DATA REQUESTS**

* 1. Starting on Page 34, SoCalGas’ 2020 General Order 77-M Report (available at <https://www.socalgas.com/sites/default/files/SoCalGas_Annual_2020_REDACTED_GO-77-M.pdf>), identifies membership dues and subscriptions of $500 or more.
     1. Please identify all dues, donations, subscriptions and contributions that are funded by SoCalGas ratepayers.
     2. To the extent any dues, donations, subscriptions and contributions are ratepayer funded, please indicate the Exhibit and page(s) of SoCalGas’ GRC testimony where this information is provided.
     3. Does number listed under the “Account Charged” column indicate whether an expense is assigned to ratepayers or shareholders? If so, please indicate what account numbers signify a shareholder expense and what account numbers signify a ratepayer expense.
  2. Starting at page 32 of the 2020 General Order 77-M Report, SoCalGas lists payments to outside attorneys and legal firms for the year ended December 31, 2020.
     1. Please explain the significance of the numbers in the top row of page 32 (107, 108. 184, 417, 832, and 923).
  3. Exh. SCG-02, Prepared Direct Testimony of Naim Jonathan Peress and Michelle Sim, at NJP-2:11-14 states that “‘Green hydrogen’ is considered carbon neutral as it is produced through electrolysis from renewable electricity….”
     1. Does SoCalGas consider hydrogen produced from grid electricity to fall within its definition of “green hydrogen”?
     2. Does SoCalGas consider hydrogen produced from grid electricity with purchase and retirement of Renewable Energy Credits (“RECs”) to offset grid electricity from non-renewable resources to fall within its definition of “green hydrogen”?
     3. Does SoCalGas consider hydrogen produced from renewable electricity where RECs are not purchased and retired to fall within its definition of “green hydrogen”?
  4. Exh. SCG-02 at NJP-10:11-13 states that “In March 2019, SoCalGas announced a plan to replace 20 percent of the Company’s core customers’ traditional natural gas supply with Renewable Natural Gas (RNG) from organic waste streams by 2030.” NJP 11:4-6 states that “In February 2022, the CPUC issued an order establishing state-wide RNG procurement requirements accounting to 17.6 BCF in 2025 and 72 BCF in 2020, comprising 12.2% of annual bundled core customer demand in 2030.”
     1. Has SoCalGas estimated the cost of procuring RNG to meet the difference between the Commission ordered statewide RNG procurement requirements from 2030 (12.2% of annual bundled core customer demand) and SoCalGas’ plan to replace 20 percent of core customer demand with RNG by 2030? If so, please provide all cost estimates and supporting analysis.
     2. Has SoCalGas identified potential sources of RNG supply to meet the difference between the Commission ordered statewide RNG procurement requirements from 2030 (12.2% of annual bundled core customer demand) and SoCalGas’ plan to replace 20 percent of core customer demand with RNG by 2030? If so, please provide all supporting analysis.
     3. Does SoCalGas consider RNG procured under the Low Carbon Fuel Standard (LCFS) as meeting core customer demand? If yes, please explain your answer.
     4. Are the Dairy farm pilots referenced at NJP-10:18-19 producing RNG to meet SoCalGas core customer demand?
  5. Exh. SCG-02 at NJP-12:17-23 states that “SoCalGas is supporting multiple demonstration projects in an effort to decarbonize California’s transportation sector by accelerating the adoption and commercialization of steam methane reforming (SMR) technology….This partnership will demonstrate the use of commercial SMR technology with RNG feedstock to produce hydrogen refueling operations at a northern California facility.”
     1. Please identify the source of funding for this demonstration project and whether it is ratepayer funded.
     2. Please identify the RNG feedstock for this project.
     3. Does this project use directed biogas to claim RNG is the feedstock for SMR produced hydrogen? If so, please identify the location(s) and source (landfill, dairy etc) of the directed biogas.
  6. Exh. SCG-02 at NJP-14:2-3 states that “SoCalGas took delivery of 50 Toyota Mirai HFCEVs earlier this year.”
     1. What was the cost to take “delivery of 50 Toyota Mirai HFCEVs”?
     2. Where the 50 Toyota Mirai purchased or leased? If leased, please indicate length of lease.
     3. Is SoCalGas assigning the cost to take “delivery of 50 Toyota Mirai HFCEVs” to customers? If yes, please indicate the Commission decision authorizing these costs.
     4. Page 398 of D.19-09-051, the Decision Addressing SoCalGas and SDG&E’s 2019 GRC, stated that SoCalGas “should be prepared to sincerely explore what portions of its fleet could transition to either battery electric or hybrid electric vehicles.” Please explain why SoCalGas took delivery of 50 HFCEVs instead of electric or hybrid electric vehicles.
  7. Exh. SCG-02 at NJP-19:8-9 states that “SoCalGas is building a Hydrogen Home, a state-of-the-art project to show the role hydrogen could play in attaining California’s carbon neutrality goal.”
     1. Is SoCalGas using ratepayer funds for this project? If yes, please indicate the Commission authorization for use of ratepayer funds for this purpose.
     2. Please identify any California state agency reports SoCalGas is aware of that identify use of hydrogen in residential homes as necessary to attain California’s carbon neutrality goal.
  8. Exh. SCG-04, Direct Testimony of Mario Aguirre, at MAA-9, Table MA-2 identifies the number of incremental vehicles SoCalGas is adding “in each year to support the additional field workforce associated with the forecasted level of O&M and capacity activities.”
     1. Please confirm the identified incremental vehicles would be a net addition to SoCalGas vehicle fleet (as opposed to replacement).
     2. Please provide all analysis justifying the need for the identified incremental vehicles “to support the additional field workforce”
     3. Please indicate the fuel source (electric, gasoline etc) for the identified incremental vehicles.
  9. Exh. SCG-04 at MAA-66:19-23 sates that “Regional Public Affairs’ (RPA) primary focus is supporting field operations through its work with regional and local governments and municipal districts on issues regarding permitting, proposed regulations, franchises, and emergency preparedness and response. In preparation of this testimony, the Company has removed costs for lobbying, civic, and related activities, and other nonallowable expenses.”
     1. What was the precent reduction in requested costs due to the removal of “costs for lobbying, civic, and related activities, and other nonallowable expenses.”
     2. How did SoCalGas determine the extent to which costs by RPA related to “lobbying, civic, and related activities, and other nonallowable expenses” were incurred?
     3. Does SoCalGas consider work related to “proposed regulations” lobbying or an otherwise nonallowable expense? If not, please explain the circumstances under which SoCalGas views work on proposed regulations as an allowable customer expense.
     4. Does RPA provide written or oral communications on local government Climate Action Plans, reach codes, or other local actions to reduce greenhouse gas emissions and/or criteria air pollutants? If yes:
        1. Does SoCalGas consider this a recoverable expense?
        2. Please provide all such written communications by RPA to local governments from January 1, 2020 to the present.
  10. Exh. SCG-04 at MAA-79:15-18 states that the forecast method for New Business expenditures was developed “using the projected new meter sets added to the distribution system multiplied by the historical cost per meter set, which reflects the mix of work that is anticipated to construct new main extensions and associated service laterals.”
      1. Please state the extent to which New Business expenditures account for line extension allowances (“LEAs”) under Rule 20.
      2. To the extent the Commission eliminates LEAs effective July 1, 2023 as proposed by Commission staff in R.19-01-011 (Building Decarbonization Proceeding), please state the extent to which this would impact SoCalGas’ proposed New Business Construction expenditures and the extent to which elimination of gas LEAs would impact any other aspect of SoCalGas’ requested expenditures in its GRC Application.
  11. Please state whether the New Meter Set Installations listed in Table MA-39 on page MAA-80 of Exhibit SCG-04 from 2017-2021 are based off of actual or forecasted installations.
  12. Exh. SCG-04 at MAA-82:2-4 states that “the new meter set forecast for the purposes of calculating the New Business Construction expenditures has been calculated by accounting for only 79.5% of the anticipated housing completions, which is the historical ratio of new meter sets to housing starts.”
      1. Please explain the extent to which SoCalGas accounted for all-electric new construction in forecasting new meter set installations.
  13. Please explain the basis for the assertion in Exh. SCG-04 at MAA-84:1-3 that “it is challenging to identify and estimate the specific routine pressure betterment projects more than a year into the future.”
  14. Exh. SCG-04 at MAA-84:3 states “the latest load and growth information are used” to estimate pressure betterment project expenses.
      1. Please identify the sources for “the latest load and growth information” referenced in this statement.
      2. To what extent did SoCalGas account for the impact of the Title 2022 Building Code on gas demand from new construction in estimating pressure betterment project expenses?
      3. To what extent did SoCalGas account for fuel switching from gas to electric end uses in estimating pressure betterment project expenses?
      4. To what extent did SoCalGas account for all-electric new construction in in estimating pressure betterment project expenses?
      5. To what extent does SoCalGas consider non-pipeline alternatives such as fuel switching from gas to electric end uses to avoid the need for pressure betterment projects.
  15. Exh. SCG-04 at MAA-85:1-3 states that Main Replacements “are often due to leakage that impacts the integrity of the pipe, an anticipated increased in leakage maintenance expenses, the relative cost to install and/or maintain cathodic protection, or the deterioration of pipe material, pipe wrap, or coating.”
      1. Please describe what process, if any, SoCalGas uses to examine non-pipeline alternatives such as targeted electrification before proceeding with a main replacement project.
      2. Please explain the difference, if any, between a distribution pipeline main from other pipelines on the distribution system.
      3. Please identify all SoCalGas Main Replacements, their total cost, location, and justification in 2019, 2020 and 2021.
  16. Exh. SCG-04 at MAA-85:6-8 states that “Based on information collected during various O&M activities and field observations, technical staff identifies and prioritizes pipeline segments that require replacement.”
      1. What is the time horizon between when SoCalGas identifies the need for a main replacement and when the main replacement occurs?