**Proceeding Name:** A2205015 016 - SoCalGas and SDGE 2024 GRC

Proceeding Number: A2205015 016 2024 GRC

Publish To: California Environment Justice Association

**Date Received:** 10/11/2022 **Date Responded:10/25/2022** 

12. Page 38 of SoCalGas' 2021 GO 77-M Report identifies \$1,143,592 in expenses for the law firm Reichman Jorgensen LLP under the account number 923. Were some or all of these costs assigned to ratepayers? If only partially assigned, please indicate the amount assigned to ratepayers.

## **SoCalGas Response 12:**

The dollar amount \$1,143,592 listed under account number 923 for the law firm Reichman Jorgensen LLP is considered a ratepayer cost.

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13. Page 38 of SoCalGas' 2021 GO 77-M Report identifies \$594,511 in expenses for the law firm Holland & Knight LLP under the account number 923. Were some or all of these costs assigned to ratepayers? If only partially assigned, please indicate the amount assigned to ratepayers.

## **SoCalGas Response 13:**

The dollar amount \$594,511 listed under account number 923 for the law firm Holland & Knight LLP is considered a ratepayer cost.

Proceeding Name: A2205015 016 - SoCalGas and SDGE 2024 GRC

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- 14. Data Request CEJA-SEU-07, Q.2 requested the total cost of SoCalGas' AGA membership and the total amount SoCalGas seeks to recover from ratepayers." The response to this data request states that "the basis for the request in the TY2024 GRC utilizes the Base Year 2021 incurred ratepayer portion of the expenses of \$926,581" but does not provide the total cost of SoCalGas' AGA membership.
- a. Please provide the total cost of SoCalGas' AGA membership. This information is relevant to understand the percent of total membership costs SoCalGas seeks to recover from ratepayers.
- b. Please provide the 2021 invoice for AGA membership dues.

## **SoCalGas Response 14:**

a. The total 2021 cost of the AGA membership dues was \$1,090,876. As noted at the bottom of the attached invoices within the Important IRS Required Notice section, 3.8% of the dues is allocable to lobbying. Additionally, SoCalGas assigns a portion of these dues to SDG&E through an inter-company billing process. The amount of 2021 AGA dues that SoCalGas assigned to its ratepayers was \$926,581.

Annual	Quarterly	<u>SCG</u>	SDG&E
\$1,090,876	\$272,719	240,796	31,923
	3.8%	9,150	1,213
	Net	231,646	30,710
	Annual Net	926,581	122,840

b. Please see the file:

"CEJA-SEU-008 Q14b Redacted Attachment.pdf"

Proceeding Name: A2205015 016 - SoCalGas and SDGE 2024 GRC

**Proceeding Number:** A2205015\_016 2024 GRC

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15. The attachment provided in response to data request CEJA-SEU-07, Q.1 includes a \$60,000 membership for the Northeast Gas Association. Please explain the basis for including membership costs for the Northeast Gas Association as a ratepayer expense.

## **SoCalGas Response 15:**

The SoCalGas Northeast Gas Association membership referenced is specifically for the SoCalGas RD&D Program. This membership is an important component in a much larger technology funding ecosystem that includes gas industry research consortia and numerous federal, state, and regional public agencies. This helps program staff in their quest to develop products and technologies that reduce customer costs, save energy, increase safety and reliability, improve air quality, and reduce GHG emissions.

The Northeast Gas Association (NGA) manages NYSEARCH - one of the premier natural gas RD&D programs in North America dedicated to serving its 20 gas utility member companies and project funding partners. NYSEARCH members voluntarily participate in projects and programs to target RD&D areas that address their unique challenges and opportunities. For more than 20 years, NYSEARCH has worked as a consortium of natural gas LDCs that have common interests and needs, such as continually improving the operation, safety, efficiency, maintenance, and upgrade of gas delivery systems. NYSEARCH is a subscription-based research organization with dues used to offset operating costs such as administration, contracting, and accounting. The dues are the entry fee for all members and allow member-access to information and to the collaborative interaction with other utilities. All additional R&D costs are voluntary and based on individual member decisions to support specific projects that provide a benefit to the member. The dues amount is based upon the number of gas customers in the member's service territory.

The NYSEARCH research organization is unique in its ability to help member companies & partners leverage RD&D investments, while targeting their participation to projects that best meet their individual needs. The core of the NYSEARCH RD&D model is to provide collaboration and guidance from participating members. RD&D Program staff have developed strong ties with several research consortia focused on the gas industry. These consortia serve member utilities by facilitating technical collaboration and pooling financial and technical resources to collectively address ongoing or anticipated challenges in the gas industry. By working closely with these and other similar organizations, RD&D Program staff can share both knowledge and funding with other utilities and researchers to develop and execute impactful projects. Coordination of work between

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Proceeding Number: A2205015\_016 2024 GRC

Publish To: California Environment Justice Association

Date Received: 10/11/2022 Date Responded:10/25/2022

SoCalGas Response 15-Continued

these organizations and access to technical libraries also greatly reduce the odds of reproducing previously completed work or work currently underway.

Currently, the NYSEARCH RD&D program is managing 26 projects supported by SoCalGas in various stages of development. These projects have a variety of identified rate-payer benefits, with most of them including benefits related to enhancement of safety and reliability of the natural gas system.