

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

Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019.

Application 17-10-007  
(Filed October 6, 2017)

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2019.

Application 17-10-008  
(Filed October 6, 2017)

**RESPONSE OF SIERRA CLUB AND UNION OF CONCERNED SCIENTISTS IN  
SUPPORT OF TURN'S APPLICATION FOR REHEARING OF  
DECISION NO. 19-09-051**

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*Attorneys for Sierra Club and  
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Dated: November 15, 2019

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**RESPONSE OF SIERRA CLUB AND UNION OF CONCERNED SCIENTISTS IN  
SUPPORT OF TURN’S APPLICATION FOR REHEARING OF  
DECISION NO. 19-09-051**

Sierra Club and the Union of Concerned Scientists (“UCS”) respectfully submit this response in support of the Application of The Utility Reform Network (“TURN”) for Rehearing of Decision (“D.”) No. 19-09-051, filed October 31, 2019. This response is timely pursuant to California Public Utilities Commission Rule 16.1(d).

**I. INTRODUCTION**

TURN raises several important issues for the Commission to reconsider in D.19-09-051. In this response, Sierra Club and UCS focus on two issues that are central to their members’ interests. First, the decision erroneously shifted the burden of proof to TURN and other intervenors to show that ratepayers should not be responsible for industry association dues, which will encourage other utilities to obscure—rather than justify—their costs in future rate cases. Second, the decision made a legal error by allowing the Sempra Utilities to force ratepayers to bear the costs of the utilities’ voluntary contributions to a secret group of organizations, which may include organizations whose efforts to undermine California policies are odious to Sierra Club and UCS members. The Commission should rehear D.19-09-051 to correct these errors and revisit the other issues TURN raises in its application for rehearing.

**II. D.19-09-051 IMPROPERLY SHIFTED THE BURDEN TO INTERVENORS TO SHOW THAT RATEPAYERS SHOULD NOT BE RESPONSIBLE FOR INDUSTRY ASSOCIATION DUES.**

As TURN's application for rehearing shows, D.19-09-051 committed legal error by putting the burden on an intervenor to decipher what components of San Diego Gas & Electric's ("SDG&E") Edison Electric Institute ("EEI") dues were not recoverable.<sup>1</sup> Not only does the decision improperly presume these association dues are recoverable unless an intervenor proves otherwise, but it is impossible for intervenors to meet this inappropriate burden. That is because intervenors do not have access to information regarding the portion of a utility's industry dues that go toward unrecoverable expenses such as legislative advocacy, regulatory advocacy, marketing, public relations, advertising, donations, and club dues. SDG&E's ability to avoid producing this information for TURN in this case illustrates that a utility can easily stymie all reasonable efforts by an intervenor to obtain this information.<sup>2</sup>

If the Commission allows the Sempra Utilities to recover EEI dues from ratepayers through this improper procedure, the Commission will invite similar gamesmanship from all the investor-owned utilities in future rate cases. When utilities have an opportunity to shift the burden of proof, they use it. For instance, in 2014, the Commission regretted issuing guidance related to Energy Resource Recovery Accounts that "succeeded mainly in providing the utilities an opportunity to shift the burden of proof onto ORA" because "[t]he utilities took advantage of that opportunity."<sup>3</sup> The Commission should not wait for a future case to correct the error of shifting the burden to intervenors to show that ratepayers should not be forced to pay the utilities' industry association dues. Like its decision in the recent Southern California Edison general rate case, the Commission should find the entirety of EEI dues are not recoverable from ratepayers.<sup>4</sup>

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<sup>1</sup> D.19-09-051 at 583; TURN Application for Rehearing of D.19-09-051 at 13–15.

<sup>2</sup> Ex. 364 (SDG&E-230 – Rebuttal Testimony of Tashonda Taylor (Human Resources Department, et al.)) at TT-C-1 (Data Request TURN-SEU-DR-019); Ex. 258 (SDG&E Response to TURN Data Request 74-2).

<sup>3</sup> D.14-07-006 at 19.

<sup>4</sup> D.19-05-020 at 250 ("SCE has failed to present supporting evidence which would enable us to determine how much EEI's beneficial services should cost ratepayers. We find SCE has not met its burden to establish any portion of the EEI dues are recoverable from ratepayers.").

**III. THE COMMISSION SHOULD CORRECT THE ERROR IN D.19-09-051 TO ALLOW THE SEMPRA UTILITIES TO COLLECT FROM RATEPAYERS THEIR VOLUNTARY CONTRIBUTIONS TO SECRET ORGANIZATIONS THAT MAY UNDERMINE CALIFORNIA’S CLIMATE POLICIES.**

D.19-09-051 allowed the Sempra Utilities to make ratepayers bear the costs of the utilities’ voluntary payments to business organizations, nonprofits, and other groups that have nothing to do with the provision of utility service.<sup>5</sup> This decision is particularly egregious because the utilities marked the list of recipients as confidential, preventing the public from understanding the potential harms from the Sempra Utilities using donations to advance their political goals.<sup>6</sup> The Commission should correct this deviation from over five decades of precedent preventing utilities from charging their ratepayers for donations, contributions, and service club dues.<sup>7</sup> Failure to do so would infringe the First Amendment rights of Sierra Club and UCS members who do not want to support the political movement against climate action.

**A. The Sempra Utilities did not show that their voluntary contributions are in the ratepayers’ interest, and these undisclosed expenses may advance the shareholders’ interests to the detriment of California policy.**

D.19-09-051 approved ratepayer money for the Sempra Utilities’ voluntary donations and organization dues without identifying ratepayer benefits from these expenses, and there is no evidence of such ratepayer benefits in the record. The decision only identified benefits that accrue to Southern California Gas Company (“SoCalGas”) from paying membership dues to chambers of commerce and other clubs, such as “foster[ing] SoCalGas’ relationships with local business,” helping “SoCalGas in keeping abreast of developments and issues of concern in business and local communities,” and adding “another means of communication with some of its stakeholders.”<sup>8</sup> These are benefits to SoCalGas and its shareholders, not to ratepayers. On its own, the utilities’ inability to show that its voluntary contributions benefit ratepayers is enough to end the inquiry into whether SoCalGas met its burden of proof to recover these costs from ratepayers.

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<sup>5</sup> D.19-09-051 at 590–91; TURN Application at 25–26.

<sup>6</sup> A.17-10-007/008, Opening Brief of The Utility Reform Network at 308, fn. 1209 (Sept. 21, 2018) (“The identities of the specific sponsorships, as well as the invoices, appear in Confidential Attachment 11 in Ex. 496-C (Confidential Attachments to TURN-03)”).

<sup>7</sup> *Pacific Tel. & Tel. Co. v. Public Utilities Commission* (1965) 62 Cal.2d 634, 669 [44 Cal.Rptr.1, 401 P.2d 353]; D.04-07-022 at 199 (SCE 2003 GRC), citing D.96-01-011 (SCE 1995 GRC).

<sup>8</sup> D.19-09-051 at 590–91.

This issue requires the Commission’s attention because the Sempra Utilities’ voluntary contributions do not just fail to deliver ratepayer benefits—they may directly undermine California policies and the interests of ratepayers. Although the Sempra Utilities’ decision to mark the beneficiaries of its test-year donations and sponsorships as confidential prevents the public from understanding the impact of these payments, the utilities have a troubling practice of support for organizations that are hostile to California climate policies and using donations to elicit support for its self-serving agenda.

The Sempra Utilities use customer money to finance organizations that fight climate policies. For instance, the Sempra Utilities give large contributions to the American Public Gas Association (“APGA”), an industry group that the utilities are not eligible to join as members, and participate in APGA’s policy advocacy. For the past three years, SoCalGas contributed \$50,000 annually to APGA, \$25,000 of which is passed to ratepayers.<sup>9</sup> SoCalGas also passes to customers as much as \$856,000 for membership annual dues to the American Gas Association (“AGA”).<sup>10</sup> Coordinating with other industry associations, the AGA and APGA petitioned the U.S. Department of Energy to withdraw its proposed standards for residential water heaters and issue an interpretative rule establishing a separate class for furnaces and water heaters “using condensing combustion technology.”<sup>11</sup> This petition contravenes California policy, as evidenced by the California Energy Commission “strongly” opposing it and stating that the “effect of granting the petition would be to put a cap on the energy efficiency of gas furnaces and water heaters by distinguishing products based on technologies that drive improvement in energy efficiency. This is an untenable approach to energy efficiency standards.”<sup>12</sup> Notably, reflecting TURN’s concerns over the significant informational shortcomings of the Sempra Utilities’ application, neither the AGA nor APGA contributions appear to have been disclosed in their testimony.

For the Sempra Utilities, voluntary payments are also a tool for soliciting support for policies that are in the utilities’ self-interest. For instance, a Los Angeles Times investigation

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<sup>9</sup> Attach. 1, Data Request CALADVOCATES-HB-SCG-2019-11.

<sup>10</sup> *Id.*

<sup>11</sup> Petition for Rulemaking Before the Office of Energy Efficiency and Renewable Energy, United States Department of Energy, at 2, 4, 9 (Oct. 18, 2018), <https://www.regulations.gov/document?D=EERE-2018-BT-STD-0018-0063>.

<sup>12</sup> Attach 2, CEC Comments Re: Energy Conservation Program: Energy Standards for Residential Furnaces and Commercial Water Heaters, Notice of Petition for Rulemaking (Mar. 1, 2019).

revealed that between 2015 and 2018 SoCalGas contributed \$830,000 to organizations represented on the board of Californians for Balanced Energy Solutions, an astroturf group SoCalGas was instrumental in creating to oppose electrification of natural gas end uses.<sup>13</sup> The Sempra Utilities also produced documents that illustrate this strategy in a current proceeding considering the Sempra Utilities’ proposal for a renewable natural gas tariff, A.19-02-015. In emails produced in discovery, Sempra Utilities employees responded to requests for donations and membership dues from outside groups with their own requests for letters of support for the tariff proposal.<sup>14</sup> The Los Angeles Times found that the Sempra Utilities gave \$900,000 between 2015 and 2018 to organizations that submitted these letters of support for the renewable natural gas tariff.<sup>15</sup> SoCalGas’ use of contributions to further its regulatory agenda is consistent with a body of academic literature finding that “[a]cross a range of issues and regulatory agencies, researchers and journalists have documented cases of companies using charitable contributions to co-opt ostensibly neutral and even non-aligned non-profits.”<sup>16</sup> These costs serve SoCalGas’ self-interest and must be borne by SoCalGas shareholders.

**B. The First Amendment protects ratepayers from funding the Sempra Utilities’ fight against climate action.**

The prospect of Sempra forcing ratepayers to pay contributions to politically active groups raises serious First Amendment concerns. As the New York Court of Appeals explained, “ratepayers are entitled to protection against forced financial support for causes and messages personally distasteful to them, because that would render those individuals faithless to their own beliefs.”<sup>17</sup> The court overturned the Public Service Commission’s decision to allow utilities to charge ratepayers for contributions to political and religious organizations, noting that the contributions may advance “the private interests of the utility corporations and their

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<sup>13</sup> Sammy Roth, *California ditched coal. The gas company is worried it’s next*, Los Angeles Times, Oct. 22, 2019, <https://www.latimes.com/environment/story/2019-10-22/southern-california-gas-climate-change>.

<sup>14</sup> Attach. 3, A.19-02-015, Direct Testimony of Matthew Freedman on Behalf of The Utility Reform Network, Appendix B (Oct. 14, 2019) (excerpts).

<sup>15</sup> Sammy Roth, *supra*, fn. 13.

<sup>16</sup> Marianne Bertrand et al., *Hall of Mirrors: Corporate Philanthropy and Strategic Advocacy*, National Bureau of Economic Research, at 3 (Dec. 2018), <https://economics.stanford.edu/sites/g/files/sbiybj9386/f/bbfht5dec2018.pdf>.

<sup>17</sup> *Cahill v. Public Service Commission* (1990) 76 N.Y.2d 102, 111 [556 N.E.2d 133].

shareholders” that are distinct from the service interests of the ratepayers.<sup>18</sup> The court warned that the Public Service Commission’s approach “would convert the free marketplace of ideas to the consumer-subsidized preserve of corporate utility ideas.”<sup>19</sup> The Sempra Utilities’ ratepayers should not subsidize the corporate utilities’ ideas regarding decarbonization policy, especially when those ideas are inconsistent with stabilizing the climate.

When the California Supreme Court upheld the Commission’s policy to exclude such sponsorships, it noted the Commission’s concern that “many ratepayers may not approve [of the various] donations made and they should be permitted to exercise their own free choice in such matters.”<sup>20</sup> Sierra Club and UCS’ members include ratepayers who do not approve of supporting groups like APGA that combat decarbonization efforts. As the court observed more than fifty years ago, they “should be permitted to exercise their own free choice in such matters.” The First Amendment protects that choice.<sup>21</sup>

#### IV. CONCLUSION

For the reasons set forth above and in TURN’s application for rehearing, the Commission should grant rehearing of D.19-09-051.

Respectfully submitted,

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Dated: November 15, 2019

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<sup>18</sup> *Cahill*, 76 N.Y.2d at 114.

<sup>19</sup> *Id.*

<sup>20</sup> *Pacific Tel. & Tel. Co.*, 62 Cal.2d at 669.

<sup>21</sup> *Id.*

**Attachment 1 – Data Request CALADVOCATES-HB-SCG-2019-11**

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**(DATA REQUEST CALADVOCATES-HB-SCG-2019-11)**  
**RECEIVED: AUGUST 28, 2019**  
**SUBMITTED: OCTOBER 7, 2019**

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**Preliminary Statement:** SoCalGas compiled its responses to the following questions by querying its charitable giving database, as well as its SAP system, for payments made to the vendor names provided in the questions. Payments were aggregated by year and by Internal Order (IO). Cost center information was also provided, and the response notes whether the IO indicates that the charges were made to a shareholder or ratepayer account. The year charged is based on the date the payment was made. As noted in the TY2019 General Rate Case (GRC) workpapers, not all costs recorded to the cost centers are requested for recovery from ratepayers. During the development of the GRC forecasts, it is sometimes necessary to remove incurred costs to further ensure that ratepayers are not funding activities that should be borne by shareholders. SoCalGas interprets the request for “contracts or agreements” to exclude standard invoices for payment.

**QUESTION 1:**

Sempra Energy is a funder of American Council for an Energy-Efficient Economy (ACEEE).<sup>1</sup>

- a. How much money has SoCalGas contributed to ACEEE in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to ACEEE from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to ACEEE.
- d. Have you committed to make future payments to ACEEE? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and ACEEE.

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<sup>1</sup> <https://aceee.org/sources-funding#utility>

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- f. Provide documentation of any journal entries associated with ACEEE recorded expenses from January 1, 2019 to the present.

**RESPONSE 1:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached. Further, see page 88 of the Energy Efficiency Policy Manual regarding travel and conference fees.  
[https://www.cpuc.ca.gov/uploadedFiles/CPUC\\_Public\\_Website/Content/Utilities and Industries/Energy - Electricity and Natural Gas/EEPPolicyManualV5forPDF.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Energy_-_Electricity_and_Natural_Gas/EEPPolicyManualV5forPDF.pdf).
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 2:**

A Sempra Utilities employee is a board member of the California Foundation on the Environment and the Economy (CFEE).

- a. How much money has SoCalGas contributed to CFEE in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to CFEE from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to CFEE.
- d. Have you committed to make future payments to CFEE? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and CFEE.
- f. Provide documentation of any journal entries associated with CFEE recorded expenses from January 1, 2019 to the present.

**RESPONSE 2:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 3:**

SoCalGas is a member of the Executive Committee of the Los Angeles County Economic Development Corporation (LAEDC).

- a. How much money has SoCalGas contributed to LAEDC in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to LAEDC from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to LAEDC.
- d. Have you committed to make future payments to LAEDC? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas and LAEDC.
- f. Provide documentation of any journal entries associated with LAEDC recorded expenses from January 1, 2019 to the present.

**RESPONSE 3:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

**SOUTHERN CALIFORNIA GAS COMPANY**  
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**QUESTION 4:**

A SoCalGas officer is a member of the board of directors of the American Gas Association (AGA).

- a. How much money has SoCalGas contributed to AGA in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to AGA from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to AGA.
- d. Have you committed to make future payments to AGA? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and AGA.
- f. Provide documentation of any journal entries associated with AGA recorded expenses from January 1, 2019 to the present.

**RESPONSE 4:**

- a. Please see attached Excel file. The amounts identified in the attachment represent SoCalGas' portion of the AGA membership. A portion of the membership is also paid by SDG&E.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. Please see the attached. SoCalGas will augment this response with any other contracts or formal agreements that may be discovered.



AGA 2018.pdf



AGA 2019.pdf

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- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 5:**

SoCalGas is a member of Coalition for Renewable Natural Gas (RNG Coalition).

- a. How much money have you contributed to the RNG Coalition in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to the RNG Coalition from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to the RNG Coalition.
- d. Have you committed to make future payments to the RNG Coalition? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and the RNG Coalition.
- f. Provide documentation of any journal entries associated with the RNG Coalition recorded expenses from January 1, 2019 to the present.

**RESPONSE 5:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 6:**

SoCalGas is a member of Bioenergy Association of California (BAC).

- a. How much money have you contributed to BAC in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to BAC from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to BAC.
- d. Have you committed to make future payments to BAC? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and BAC.
- f. Provide documentation of any journal entries associated with BAC recorded expenses from January 1, 2019 to the present.

**RESPONSE 6:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 7:**

SoCalGas is a “charter member” of the California Natural Gas Vehicle Coalition (CaINGV).

- a. How much money have you contributed to CaINGV in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to CaINGV from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to CaINGV.
- d. Have you committed to make future payments to CaINGV? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and CaINGV.
- f. Provide documentation of any journal entries associated with CaINGV recorded expenses from January 1, 2019 to the present.

**RESPONSE 7:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

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**QUESTION 8:**

SoCalGas has contributed to the American Public Gas Association (APGA).

- a. How much money have you contributed to APGA in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to APGA from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to APGA.
- d. Have you committed to make future payments to APGA? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and APGA.
- f. Provide documentation of any journal entries associated with APGA recorded expenses from January 1, 2019 to the present.

**RESPONSE 8:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**(DATA REQUEST CALADVOCATES-HB-SCG-2019-11)**  
**RECEIVED: AUGUST 28, 2019**  
**SUBMITTED: OCTOBER 7, 2019**

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**QUESTION 9:**

SoCalGas has contributed to the California Council for Environmental and Economic Balance (CCEEB).

- a. How much money have you contributed to CCEEB in each calendar year from 2017 to the present?
- b. Please state the funding source(s) (specific account and cost center) to which you have charged payments to CCEEB from January 1, 2017 to the present. If you have charged costs to more than one funding source, state the amount charged to each one.
- c. Please provide the controlling document that provides instructions to your accounting department regarding how to record costs associated with contributions to CCEEB.
- d. Have you committed to make future payments to CCEEB? If so, how much money have you committed and when are those payments due?
- e. Please provide any contracts or agreements that exist between SoCalGas (or Sempra) and CCEEB.
- f. Provide documentation of any journal entries associated with CCEEB recorded expenses from January 1, 2019 to the present.

**RESPONSE 9:**

- a. Please see attached Excel file.
- b. Please see attached Excel file.
- c. See Approval and Commitment Policy attached.
- d. The attached Excel file identifies any payments that are expected to be made for the remainder of 2019.
- e. SoCalGas has not identified any contracts or formal agreements responsive to this request as of the date of submitting this response. SoCalGas will augment this response with any contracts or formal agreements that may be discovered.
- f. SoCalGas is still researching whether or not there were any journal entries since January 1, 2019. SoCalGas will submit an amended response to include any journal entries that may be discovered.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**(DATA REQUEST CALADVOCATES-HB-SCG-2019-11)**  
**RECEIVED: AUGUST 28, 2019**  
**SUBMITTED: OCTOBER 7, 2019**

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**QUESTION 10:**

Please identify all trade associations, lobbying organizations, advocacy organizations, interest groups, and think tanks to which you have contributed funds, or of which you have been a member, since January 1, 2017.

**RESPONSE 10:**

SoCalGas objects to this question as overbroad, nonspecific, ambiguous, and unduly burdensome, specifically as to the undefined terms “contributed funds”, “trade associations”, “lobbying organizations”, “advocacy organizations”, “interest groups”, and “think tanks.” SoCalGas is willing to meet and confer with Cal Advocates regarding the scope of this request.

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY EFFICIENCY**  
**(DATA REQUEST CALADVOCATES-HB-SCG-2019-11)**  
**RECEIVED: AUGUST 28, 2019**  
**SUBMITTED: OCTOBER 7, 2019**

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**QUESTION 11:**

For each organization identified in the previous question:

- a. State how much money you have paid to the organization in each calendar year from 2017 to the present.
- b. State the funding source(s) (specific account and cost center) to which you charged the payments identified in part (a) of this question, by calendar year. If you have charged costs to more than one funding source, state the amount charged to each one.

**RESPONSE 11:**

See Response 10.

Organization Name	a. Year Charged	a. Amount	b. G/L & IO Charged	b. Cost Center Charged	b. Funding Source Indication based on initially charged IO	Notes
1. American Council for an Energy-Efficient Economy	2017	\$5,000.00	7050247, FG4261002200	2200-2120	Shareholder	
	2017	\$5,000.00	6220813, 300715765	2200-2193	Ratepayer	
	2017	\$5,000.00	6250001, 300715653	2200-2059	Ratepayer	
	2018	\$5,000.00	6220813, 300785835	2200-0429	Ratepayer	
	2018	\$15,000.00	6220600, 300786106	2200-0429	Ratepayer	
	2019	\$5,000.00	6220600, 300794330	2200-2059	Ratepayer	
	2019	\$30,000.00	6220600, 300794448	2200-0429	Ratepayer	
<b>TOTAL:</b>		<b>\$70,000.00</b>				
2. California Foundation on the Environment & the Economy	2017	\$17,500.00	7050237, FG4261002200	2200-2120	Shareholder	
	2018	\$18,000.00	7050237, FG4261002200	2200-2120	Shareholder	
	2019	\$17,500.00	7050237, FG4261002200	2200-2120	Shareholder	
<b>TOTAL:</b>		<b>\$53,000.00</b>				
3. Los Angeles Economic Development Corporation	2017	\$45,000.00	7050237, FG4261002200	2200-2120	Shareholder	
	2018	\$55,000.00	7050237, FG4261002200	2200-2120	Shareholder	
	2019	\$30,000.00	7050237, FG4261002200	2200-2120	Shareholder	
<b>TOTAL:</b>		<b>\$130,000.00</b>				
4. American Gas Association (AGA)	2017	\$815,457.99	6250001, FG9302002200	2200-2101	Ratepayer	
	2018	\$856,231.00	6250001, FG9302002200	2200-2101	Ratepayer	
	2019	\$443,971.44	6250001, FG9302002200	2200-2101	Ratepayer	
	2019	\$190,907.72			Ratepayer	Anticipated to pay in 2019
	2019	\$31,078.00			Shareholder	Anticipated to pay in 2019
<b>TOTAL:</b>		<b>\$2,337,646.15</b>				
5. Coalition For Renewable Natural Gas	2017	\$30,000.00	6250001, 300753737	2200-2229	Ratepayer	
	2017	\$20,000.00	7050241, FG4264002200	2200-2229	Shareholder	
	2017	\$4,250.00	7050240, FG4265002200	2200-2120	Shareholder	
	2018	\$15,000.00	6250001, 300753737	2200-2229	Ratepayer	
	2018	\$10,000.00	6250001, FG4264002200	2200-2229	Shareholder	
	2018	\$9,250.00	7050240, FG4265002200	2200-2120	Shareholder	

Organization Name	a. Year Charged	a. Amount	b. G/L & IO Charged	b. Cost Center Charged	b. Funding Source Indication based on initially charged IO	Notes
		<b>TOTAL:</b>	<b>\$88,500.00</b>			
6. Bioenergy Association Of California	2017	\$47,500.00	6250001, 300753737	2200-2229	Ratepayer	
	2017	\$2,500.00	7050241, FG4264002200	2200-2229	Shareholder	
	2017	\$5,000.00	7050248, FG4265002200	2200-2120	Shareholder	
	2018	\$5,000.00	7050248, FG4265002200	2200-2120	Shareholder	
	2019	\$32,500.00	6250001, 300753737	2200-2229	Ratepayer	
	2019	\$5,000.00			Shareholder	Anticipated to pay in 2019
		<b>TOTAL:</b>	<b>\$97,500.00</b>			
7. California Natural Gas Vehicle Coalition	2017	\$9,750.00	7050241, FG4264002200	2200-2119	Shareholder	
	2018	\$55,250.00	6250001, FG9100002200	2200-0234	Ratepayer	
	2018	\$9,750.00	7050241, FG4264002200	2200-2119	Shareholder	
	2018	\$75,000.00	6220600, 300645944	2200-2396	Ratepayer	
	2019	\$55,250.00	625001, 300753737	2200-2229	Ratepayer	
	2019	\$9,750.00	7050241, FG4264002200	2200-2119	Shareholder	
	2019	\$2,500.00	6220813, FG9210002200	2200-2441	Ratepayer	
		<b>TOTAL:</b>	<b>\$217,250.00</b>			
8. American Public Gas Association (APGA)	2017	\$25,000.00	6250001, FG9080002200	2200-2238	Ratepayer	
	2017	\$25,000.00	7050240, FG4265002200	2200-2120	Shareholder	
	2018	\$25,000.00	6250001, FG9302002200	2200-1212	Ratepayer	
	2018	\$25,000.00	7050240, FG4265002200	2200-2120	Shareholder	
	2019	\$25,000.00	6220002, 300796601	2200-2204	Ratepayer	
	2019	\$25,000.00	6220002, 300796601	2200-2204	Shareholder	
		<b>TOTAL:</b>	<b>\$150,000.00</b>			
9. California Council for Environmental and Economic Balance	2017	\$8,005.00	6230641, 300645944	2200-2396	Ratepayer	
	2017	\$12,750.00	6250000, 300645944	2200-2396	Ratepayer	
	2017	\$81,180.00	7050248, FG4265002200	2200-2120	Shareholder	
	2017	\$820.00	7050241, FG4264002200	2200-2119	Shareholder	
	2018	\$5,000.00	6220600, FG9080002200	2200-2288	Ratepayer	

Organization Name	a. Year Charged	a. Amount	b. G/L & IO Charged	b. Cost Center Charged	b. Funding Source Indication based on initially charged IO	Notes
	2018	\$25,500.00	6250001, 300645944	2200-2396	Ratepayer	
	2018	\$5,830.00	6230641, 300645944	2200-2396	Ratepayer	
	2018	\$81,180.00	7050248, FG4265002200	2200-2120	Shareholder	
	2018	\$820.00	7050241, FG4264002200	2200-2119	Shareholder	
	2019	\$110,680.00	7050248, FG4265002200	2200-2120	Shareholder	
	2019	\$1,820.00	7050241, FG4264002200	2200-2119	Shareholder	
<b>TOTAL:</b>		<b>\$333,585.00</b>				

**Attachment 2 – CEC Comments Re: Energy Conservation Program: Energy Standards for Residential Furnaces and Commercial Water Heaters, Notice of Petition for Rulemaking (Mar. 1, 2019)**

**CALIFORNIA ENERGY COMMISSION**

DAVID HOCHSCHILD, CHAIR  
1516 NINTH STREET, MS 32  
SACRAMENTO, CA 95814-5512  
(916) 654-3992  
FAX (916) 651-3767  
www.energy.ca.gov

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Sierra Club and UCS Response  
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March 1, 2019

Mr. Eric Stas  
U.S. Department of Energy  
Office of the General Counsel  
1000 Independence Avenue, SW  
Washington, DC 20585-0121  
via ***www.regulations.gov***

RE: Energy Conservation Program: Energy Standards for Residential Furnaces and Commercial Water Heaters, Notice of Petition for Rulemaking  
Docket Number: EERE-2018-BT-STD-0018  
Regulation Identifier Number: Not Assigned

Dear Mr. Stas:

The California Energy Commission is the primary energy policy and planning agency for the State of California. One of the chief mandates of the Energy Commission is to reduce the wasteful, uneconomic, inefficient, and unnecessary consumption of energy and water in the state by prescribing standards for minimum levels of operating efficiency for appliances that consume a significant amount of energy or water on a statewide basis.

The Commission strongly opposes the petition from the American Public Gas Association, American Gas Association, and other gas industry petitioners (Gas Industry Petitioners) to protect non-condensing technologies in residential furnaces and commercial water heaters as a performance characteristic or feature and to withdraw the U.S. Department of Energy's (DOE's) proposed rulemakings for both standards. The petition fails to produce any evidence or analysis either contrary or additional to that already contained in the federal rulemaking records, ignores or misunderstands DOE's long-standing test for creating new product classifications, and ultimately requests that DOE take actions that are arbitrary and capricious when viewed in light of DOE's substantial record on these appliances. The effect of granting the petition would be to put a cap on the energy efficiency of gas furnaces and water heaters by distinguishing products based on technologies that drive improvements in energy efficiency. This is an untenable approach to energy efficiency standards.

The issues Gas Industry Petitioners raise are neither novel nor recent. In the March 12, 2015, Notice of Proposed Rulemaking (NOPR) on proposed efficiency standards for residential non-weatherized gas furnaces, DOE provided a comprehensive account of its reasoning for not separating condensing and non-condensing furnaces into two product categories,<sup>1</sup> and did so again in its supplemental notice of proposed rulemaking (SNOPR) issued September 23, 2016.<sup>2</sup> Gas Industry Petitioners have previously made similar arguments with respect to commercial water heaters as well, and DOE similarly dismissed these arguments in its May 31, 2016, Notice of Proposed Rulemaking.<sup>3</sup> In both rulemakings, DOE properly considered venting technology and installation as part of its cost analysis to determine if standards were economically justified. When including these installation costs, the proposed standards satisfied DOE's applicable statutory and regulatory requirements for promulgating technologically feasible and economically justified standards. Gas Industry Petitioners' request provides no new evidence or analysis that is not already contained in the federal rulemaking records and that has not already been fully considered by DOE.

Were DOE to nonetheless proceed to grant Gas Industry Petitioners' request, it would be an arbitrary and capricious action under the federal Administrative Procedures Act (See 5 U.S.C. § 706.). The petition does not offer any new evidence, reasoning, or facts to support findings that could lead to a different conclusion than that already reached by DOE in its extensive and repeated treatment of this issue in both rulemaking records. See, *Perez v. Mortgage Bankers Ass'n*, 135 S.Ct. 1199, 1209 (2015).

DOE has consistently taken the position that the particular technology used to deliver utility to a consumer is not a basis for a product classification; rather than the *method of providing the utility*, the *utility provided to the consumer* is the determining factor, exclusive of manufacturer, installer, or even consumer costs. As discussed in both rulemakings, both condensing and non-condensing furnaces and commercial water heaters provide the same utility to the consumer—heating space or water. Condensing combustion products provide this utility at lower fuel costs due to increased fuel efficiency and lower environmental impacts due to reduced fuel consumption, resulting in significant direct and indirect benefits to American residents and businesses. As DOE notes, in contrast with residential clothes dryers, where in some cases consumers may have been denied the utility of the product (the ability to dry clothes) absent a different product classification, no such problem exists for venting technologies in furnaces or commercial water heaters. Rather, as analyzed by DOE in both rulemaking records, installation costs may be slightly higher—but the product functionality remains the same, so separate product classes are inappropriate under the Energy Policy and Conservation Act (EPCA).

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<sup>1</sup> 80 Fed. Reg. 13137-38 (Mar. 12, 2015)

<sup>2</sup> 81 Fed. Reg. 65752 (Sept. 23, 2016)

<sup>3</sup> 81 Fed. Reg. 34440, 34462-34463 (May 31, 2016)

Moreover, the Gas Industry Petitioners are unlikely to be able to come up with any new evidence, reasoning, or analysis to support a different outcome than that already described by DOE in its rulemaking records:

- Commercially available products exist to address the so-called orphaned water heater scenario where a common chimney is being utilized by both an atmospherically vented furnace and water heater. The FasNSeal 80/90 by DuraVent allows for combined venting of an atmospheric appliance and a condensing appliance.<sup>4</sup> This product was formally introduced at the 2015 AHR Expo industry event.<sup>5</sup>
- In Canada, residential gas furnaces without an integrated cooling component and manufactured on or after December 31, 2012, are required to have a minimum Annual Fuel Utilization Efficiency (AFUE) of 90% (i.e., they must be condensing).<sup>6</sup> There are more than five years of implementation of this mandatory standard from which to draw installation experience and solutions to any challenges.
- If there is a specific instance where it is impossible to install a condensing gas furnace, heat pump products are readily available as replacements. Gas Industry Petitioners have not provided evidence of such an instance, but have made clear their opposition to any solution that would rely on fuel-switching to electricity. Fuel-switching, however, is a cost impact, not a utility impact, as it does not disrupt service to the consumer of warm air or hot water. These costs were included in the DOE's life-cycle cost analysis in its supplemental proposed rule for residential furnaces.

Gas Industry Petitioners have asked that DOE, contrary to the letter and intent of EPCA, lock in a particular technology and set a ceiling on the fuel efficiency of residential furnaces and commercial water heating equipment. Gas Industry Petitioners have not provided any additional evidence or information that consumers or businesses would be denied the *utility* of being able to heat their homes or heat water, and have not acknowledged readily available solutions. Rather, Gas Industry Petitioners request DOE abruptly issue interpretive rules and withdraw proposed standards on grounds that are neither necessary nor consistent with the evidentiary record and DOE's previous well-supported reasoning. In short, granting this request would be arbitrary and capricious.

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<sup>4</sup> See <http://www.duravent.com/Product.aspx?hProduct=49>.

<sup>5</sup> See [http://duravent.com/docs/product/FNS8090\\_W.pdf](http://duravent.com/docs/product/FNS8090_W.pdf).

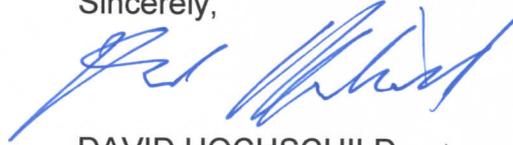
<sup>6</sup> See <https://www.nrcan.gc.ca/energy/regulations-codes-standards/products/6879>.

Mr. Eric Stas  
March 1, 2019  
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The Commission appreciates the opportunity to comment on this petition. If there are any questions about the attached comments, please contact Patrick Saxton at (916) 654-4274, or at [Patrick.Saxton@energy.ca.gov](mailto:Patrick.Saxton@energy.ca.gov).

Sincerely,



DAVID HOCHSCHILD  
Chair

**Attachment 3 – A.19-02-015, Direct Testimony of Matthew Freedman on  
Behalf of The Utility Reform Network, Appendix B (Oct. 14, 2019) (excerpts)**

---

**From:** Andrea Ostenso [REDACTED]  
**Sent:** Tuesday, February 26, 2019 2:53 PM  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] Re: Re: Re: Pre-Oscar Gala Follow Up

Hi [REDACTED]

When is the deadline for the letter? Can I get it to you by the end of the day tomorrow?

Best,  
Andrea

On Tue, Feb 26, 2019 at 1:02 PM [REDACTED] > wrote:

Hi Andrea,

Thank you for the information, I'm glad we were able to connect about this project and I am hopeful we will be able to fund again this year.

Additionally, as I mentioned during our conversation, SoCalGas plans to file with the Commission, a request to offer a voluntary "Green Tariff", which would allow us to buy renewable gas from producers and reduce the amount of fossil gas that is brought into our system, thus helping the environment. This ties in directly with your eco-ambassador project we've helped fund over the last couple of years which is I thought Global Green might want to consider writing a letter of support of this program that we could submit with our filing to the CPUC this week.

Let me know – attached is more info on the tariff, and a template, should you wish to submit a letter. If you do, we're hoping to get the letters by tomorrow, apologies on the quick turnaround.

Thanks for your consideration,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** Andrea Ostenso [REDACTED]  
**Sent:** Tuesday, February 26, 2019 12:45 PM  
**To:** [REDACTED]  
**Subject:** [EXTERNAL] Re: Re: Pre-Oscar Gala Follow Up

Hi [REDACTED]

Great speaking with you today. Attached is the original Thomas Fire proposal I referenced on the phone. The Woolsey Fire project follows the same procedure. Let me know if you have any questions. I am happy to type the document up again with Woolsey Fire specifics if it would be helpful. I will also attach the more recent 2 page summary for easy access.

All the best,  
  
Andrea

On Tue, Feb 26, 2019 at 10:56 AM Andrea Ostenso [REDACTED] wrote:

Sounds good, talk to you then.

On Tue, Feb 26, 2019 at 10:37 AM [REDACTED] wrote:

Ok, let's do 12pm. Talk to you soon!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** Andrea Ostenso [REDACTED]

**Sent:** Tuesday, February 26, 2019 10:31 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** [EXTERNAL] Re: Pre-Oscar Gala Follow Up

Hi [REDACTED]

Thanks for your quick response. Today at 12pm or 4pm works for me. You can call me at [REDACTED].

Best,

Andrea

On Mon, Feb 25, 2019 at 5:27 PM [REDACTED] wrote:

Hi Andrea,

Let's discuss. I have some time tomorrow at 11am, 12pm, or 4pm. Let me know if any of those times work.

*Thank you!*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Monday, February 25, 2019 4:25 PM

**To:** Andrea Ostenson [REDACTED] [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: [EXTERNAL] Pre-Oscar Gala Follow Up

Hi there,

I did not attend this event, but [REDACTED] did. She may have feedback for you! Also, we haven't received our 2019 budget yet, but should be soon. [REDACTED] is looking at the environmental budget and can advise if we have funding to help with this.

Thank you!

**From:** Andrea Ostenson [REDACTED]

**Sent:** Monday, February 25, 2019 3:14 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** [EXTERNAL] Pre-Oscar Gala Follow Up

Hello [REDACTED]

I hope you enjoyed your time at the Pre-Oscar Gala.

I am emailing to re-initiate interest in funding for the Woolsey Fire Rebuilding Resilience project. As discussed at the Gala, Global Green has capacity to help over 1,000 people who lost their homes to the Woolsey Fire with sufficient funding. Unfortunately, at this time we do not have adequate funding to move forward with the project.

Would SoCalGas accept another project proposal at this time to help fire affected homeowners build back green? Do you have any other suggestions for strategic partnerships for this project? Would love to discuss with you on a phone call in the next couple of weeks.

I look forward to hearing from you.

All the best,

Andrea

--

**Andrea Ostenso | Sustainable Cities Associate**

**GLOBAL GREEN**

520 Broadway, Suite 200

Santa Monica, CA 90401

tel: 715.403.0699

[www.globalgreen.org](http://www.globalgreen.org)

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This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

--

**Andrea Ostenso | Sustainable Cities Associate**

**GLOBAL GREEN**

520 Broadway, Suite 200

Santa Monica, CA 90401

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**Andrea Ostenso | Sustainable Cities Associate**

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--

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This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

**From:** [REDACTED]  
**Sent:** Monday, March 11, 2019 12:55 PM  
**To:** 'Nancy Wood' <[REDACTED]>  
**Subject:** RE: Invoice from Century City Chamber of Commerce

Yes, I do.

SoCalGas has submitted a proposal to state regulators at the California Public Utilities Commission (CPUC) that will empower customers with the option of purchasing a portion of their gas from renewable sources. Our Green Tariff proposal will help customers reach their sustainability goals and reduce their carbon footprint by displacing traditional fossil fuel with clean, renewable gas (RG). It will also help the state achieve its climate change goals by reducing methane and carbon dioxide emissions.

#### **Specifics about the tariff**

- This Renewable Gas (RG) tariff is available to all residential customers and to commercial and industrial customers for whom SoCalGas purchases gas, who upon request, voluntarily choose to designate all or a portion of their natural gas service to be provided by RG.
- At the time of enrollment, residential customers will select from a series of set dollar amounts that will be provided from RG supplies. Commercial customers will be able to select either from a series of set dollar amounts or a percentage of their total gas load.
- Residential customers will have to commit to one year. This commitment period is necessary to allow SoCalGas to enter into longer term contracts, which will reduce overall program costs. After 1 year, the percentage can change, and participation is month to month.
- Non-residential enrollment for 2 years.
- 60-day cooling-off period after initial sign up.

I have included a fact sheet, and a letter template for convenience. Letters should be addressed to SoCalGas VP as indicated. It can be e-mailed to me. Let me know if you have any additional questions.

---

**From:** Nancy Wood [REDACTED]  
**Sent:** Monday, March 11, 2019 12:51 PM

To: [REDACTED]@semprautilities.com>  
Subject: [EXTERNAL] RE: Invoice from Century City Chamber of Commerce

Hi [REDACTED],

Thanks for letting me know about membership and event sponsorship.

I would be happy to provide a letter. Do you have a template or talking points to help me?

Kind regards,

Nancy

**Nancy Wood | President & CEO | Century City Chamber of Commerce**  
2029 Century Park East, Suite 4392 | Los Angeles, CA 90067

**Upcoming Events:**

Thursday, March 21: Uncork and Unwind Happy Hour at Craft, 5:30-7:30pm

Tuesday, March 26: Citizen of the Year Awards at The Beverly Hilton, 11:30am

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**From:** [REDACTED]@semprautilities.com>  
**Sent:** Monday, March 11, 2019 12:40 PM  
**To:** Nancy Wood [REDACTED]  
**Subject:** RE: Invoice from Century City Chamber of Commerce

Hi Nancy. Sorry we didn't get a chance to speak last week.

My budget hasn't opened yet, but I will send you a membership payment link when it does.

I'm the person to talk to about events, just send me the information.

Also, I would love to get a support letter directly from Century City Chamber. What is the process to make that happen?

---

**From:** Nancy Wood [REDACTED]  
**Sent:** Monday, March 11, 2019 12:36 PM  
**To:** [REDACTED]@semprautilities.com>  
**Subject:** [EXTERNAL] Invoice from Century City Chamber of Commerce

Hi [REDACTED]

Nice to see you at the WC3 meeting last week in Santa Monica.

Sempra's membership is due to renew May 1, 2019 and I remember last year you had to send me a link to submit the invoice. I hope you will renew and would like to request the link.

Also, this morning I was at the Santa Monica Chamber's OWL Women's event and I saw that SoCal Gas was a sponsor. Our Women's Business Council has a "Lessons from the C-Suite" panel event on April 30 at the CAA theater and then of

course, our annual Women of Achievement gala in the fall. I wonder if you could tell me what types of events that would be considered for sponsorship? What is the process and who would I ask for our event to be considered?

Kind regards,

*Nancy*

**Nancy Wood | President & CEO | Century City Chamber of Commerce**  
2029 Century Park East, Suite 4392 | Los Angeles, CA 90067

Upcoming Events:

Thursday, March 21: Uncork and Unwind Happy Hour at Craft, 5:30-7:30pm

Tuesday, March 26: Citizen of the Year Awards at The Beverly Hilton, 11:30am

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February XX, 2019

Ms. Sharon Tomkins  
Vice President, Customer Solutions  
Southern California Gas Company  
555 W. Fifth Street, ML GCT 21C2  
Los Angeles, CA 90013

Re: Renewable Gas Tariff Option

Dear Ms. Tomkins:

1. Statement of support for renewable gas tariff option.
2. Brief statement about stakeholder (info about business/info about city/info about organization)
3. Reason for support.
4. Request for regulators to make option available as soon as possible.

Sincerely,

Stakeholder name