

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-1:

D.22-12-055 authorized SoCalGas to establish a memorandum account for tracking of Phase One activities with a cap of \$26 million and with an option to increase the cap by 15% through a tier 3 advice letter (OP 1-4). Please provide the total amount of funds tracked for Phase One Activities.

RESPONSE 1-1:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." The Application does not seek review and recovery of costs recorded for Phase 1 activities. SoCalGas further objects to this request on the grounds it is premature, including in the assumption that all Phase 1 costs are currently available. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase "funds tracked for Phase One Activities" and the coupling of the request with the introductory sentence.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-2:

D.22-12-055 authorized SoCalGas to establish a memorandum account for tracking of Phase One activities with a cap of \$26 million and with an option to increase the cap by 15% through a tier 3 advice letter (OP 1-4). Please provide an itemized list of costs by activity in the memorandum account.

RESPONSE 1-2:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is overly broad and unduly burdensome, particularly because the Application does not seek review and recovery of costs recorded for Phase 1 activities. SoCalGas further objects to this request on the grounds it is premature, including in the assumption that all Phase 1 costs are currently available. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with respect to the coupling of the request with the introductory sentence.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-3:

Provide contracts between SoCalGas and all contractors working for SoCalGas on Angeles Link Phase One Activities.

RESPONSE 1-3:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides that parties may obtain discovery “that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is overly broad and unduly burdensome, particularly because the Application does not seek review and recovery of costs recorded for Phase 1 activities. SoCalGas additionally objects to this request on the grounds the request is vague and ambiguous, including with respect to the phrase “all contractors working for SoCalGas on Angeles Link Phase One Activities.”

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-4:

The Phase One studies note that SoCalGas interviewed and received input from multiple organizations and individuals. Provide a list of everyone (including affiliation) that SoCalGas consulted with or interviewed for the Angeles Link Phase One studies including individuals or organizations not listed in the Phase One reports.

RESPONSE 1-4:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and furthermore vague and ambiguous, in particular due the lack of specific identification of any particular study or reference, use of the phrases “including affiliation” and “consulted with or interviewed for the Angeles Link Phase One Studies,” and reference to the introductory sentence (“The Phase One studies note that SoCalGas interviewed and received input from multiple organizations and individuals.”).

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-5:

For each individual or organization interviewed by SoCalGas for the Angeles Link Phase One studies, provide the recording, transcript, and/or notes from each interview.

RESPONSE 1-5:

SoCalGas incorporates by reference the objections stated in response to Question 1-4 above. Further, SoCalGas objects to this request on the grounds it assumes recordings, transcripts, and/or notes exist.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-6:

Provide all work papers and documents associated with each Angeles Link Phase One study.

RESPONSE 1-6:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and vague and ambiguous, including with respect to the phrase “all work papers and documents.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas understands “workpapers” to refer to appendices and technical attachments to the Phase 1 Studies, as applicable. Those are provided at: <https://www.socalgas.com/regulatory/angeleslink>

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-7:

Provide the modeling software, tools, and/or files used for each Angeles Link Phase One study.

RESPONSE 1-7:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides that parties may obtain discovery “that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.” SoCalGas additionally objects to this request on the grounds it is overly broad and unduly burdensome, and vague and ambiguous, including with respect to use of the phrase “modeling software, tools, and/or files used for each Angeles Link Phase One study” and failure to identify any specific study or reference. SoCalGas further objects to this request to the extent it seeks items that are not in SoCalGas’s possession, custody, or control.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-8:

Provide the inputs for each modeling software, tool, and/or file used for each Angeles Link Phase One study.

RESPONSE 1-8:

SoCalGas incorporates by reference the objections stated in response to Question 1-7 above.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 1-9:

Provide each data request and SoCalGas's responses for data requests that SoCalGas has received in proceeding A.24-12-011.

RESPONSE 1-9:

Non-confidential responses to data requests provided to date are available at:
<https://www.socalgas.com/regulatory/angeleslink/phase-2> See attached for non-confidential attachments.

Attachments:

- ALP2_A2412011_DR_TURN_01_Q4_Attach01_Chap7SecIIITableExcel
- ALP2_A2412011_DR_TURN_01_Q4_Attach02_Chap7Table4Excel
- ALP2_A2412011_DR_TURN_02_Q1_Attach01_UpdatedRevReq
- ALP2_A2412011_DR_TURN_02_Q1_Attach02_Interest

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
ANGELES LINK PHASE 2 A.24-12-011**

**DATA REQUEST UCAN-SCG-DR01
Date Requested: May 21, 2025, Submitted: June 5, 2025**

QUESTION 10:

Provide each data request and SoCalGas's responses for data requests that SoCalGas has received in proceeding A.22-02-007.

RESPONSE 1-10:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that parties may obtain discovery "that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence."