

**SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION FOR NATURAL RENEWABLE GAS TARIFF
(A.19-02-015)**

(DATA REQUEST SIERRA CLUB-SEMPRAUTILITIES-02)

**DATE RECEIVED: 9-18-19
DATE RESPONDED: 10-2-19**

QUESTION 1:

Page 4:2-3 of the Prepared Supplemental Direct Testimony, filed September 16, 2019 (“Supplemental Testimony”), references a report by the Energy Futures Initiative (“EFI”), *Optionality, Flexibility, & Innovation: Pathways for Deep Decarbonization in California* (“EFI Report”), which the Supplemental Testimony states “concluded that California needs to decarbonize thermal energy usage by utilizing RNG across all sectors.” (Supplemental Testimony at 4:12-13.) Page ii of the EFI Report lists SoCalGas and SDG&E as two of the EFI Report’s sponsors.

- a. What was SoCalGas’ total monetary contribution for funding the EFI Report?
- b. Was SoCalGas’ monetary contribution billed as a shareholder or ratepayer expense? If a ratepayer expense, to what account was this billed?
- c. Did SoCalGas provide any written comments or feedback on the EFI Report at any time prior to its final release? If yes, please provide all communications between SoCalGas and any member of the EFI Project Team listed on page iii of the EFI Report.
- d. What was SDG&E’s total monetary contribution for funding the EFI Report?
- e. Was SDG&E’s monetary contribution billed as a shareholder or ratepayer expense? If a ratepayer expense, to what account was this billed?
- f. Did SDG&E provide any written comments or feedback on the EFI Report at any time prior to its final release? If yes, please provide all communications between SDG&E and any member of the EFI Project Team listed on page iii of the EFI Report.
- g. Please identify the witness(es) responsible for this answer.

RESPONSE 1:

- a. SoCalGas objects to the request as it calls for shareholder funding information. In addition, the request is overbroad and seeks information that is irrelevant and outside the scope of this proceeding.
- b. Shareholder.
- c. The EFI Report went through a peer-review process. EFI requested comments and feedback from a number of entities, including, but not necessarily limited to, SoCalGas, Stanford University, University of California – Berkeley, California Institute of Technology, Energy Innovation, University of California – Irvine, Climate Works, and University of California – San Diego. Please see attached SoCalGas’ email response providing comments and feedback on the draft report.

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Sierra Club-02 Comments for EFI on
Response 1 (Email)_Rdraft report_2_12_19_

- d. SDG&E did not make a monetary contribution for funding the EFI Report.
- e. N/A
- f. SDG&E did not provide written comments or feedback.
- g. Tanya Peacock

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QUESTION 2:

Page 6:2-3 of the Supplemental Testimony states that the “Utilities will assess available RNG sources by taking into account environmental benefits and acquisition costs for program participants.”

- a. Please explain the Sempra Utilities’ position on how the environmental benefits of RNG sources may differ.
- b. Please explain the Sempra Utilities’ position on how the different environmental benefits of RNG sources will be evaluated in determining procurement of RNG sources.
- c. Please identify the witness(es) responsible for this answer.

RESPONSE 2:

- a. The Utilities define the environmental benefits from the RNG Tariff as greenhouse gas reduction potential. Different feedstocks generally have different greenhouse gas (GHG) reduction potential. This can be measured by what CARB describes as the carbon intensity.¹
- b. The Utilities will consider many factors when evaluating RNG offers, as described in the Supplemental Testimony.² Environmental benefits are also a key consideration. The Utilities expect to evaluate environmental benefits of supply based on their GHG reduction potential in conjunction with the other factors described in the Supplemental Testimony.
- c. Andrew Cheung

¹ California Air Resources Board. Low Carbon Fuel Standard Final Regulation Order. § 95481. Definitions. (24) “Carbon Intensity (CI)” means the quantity of life cycle greenhouse gas emissions, per unit of fuel energy, expressed in grams of carbon dioxide equivalent per megajoule (gCO₂e/MJ).

² RNG Tariff Supplemental Testimony. Section IV, Page 8, Scoping Issue 2, Section A.

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QUESTION 3:

Table 1 on Page 7 of the Supplemental Testimony lists the “Number of Production Facilities in North America by Region.”

- a. Please confirm that biomethane procured under the RNG Tariff could originate from any of the listed regions in Table 1.
- b. Please state the geographic limits, if any, on biomethane procured under the RNG TARIFF.
- c. Please list all countries outside the United States from which that biomethane procured under the RNG Tariff could originate.
- d. Could biomethane procured for use under the RNG Tariff originate from any of the existing production facilities listed on Table 1?
- e. Please identify the witness(es) responsible for this answer.

RESPONSE 3:

- a. Yes, RNG procured for the RNG Tariff may originate from any of the listed regions in Table 1.
- b. SoCalGas intends to procure RNG supplies that are consistent with the California Air Resource Board’s (CARB) Cap-and-Trade Regulations for biomass fuel exemption. Beyond what is required by those regulations, SoCalGas does not intend to have geographic limitations on procurement, however given the abundant RNG supply potential in the continental United States and Canada, we do not expect to source initial RNG supplies for the RNG Tariff outside of that geographic area.
- c. See Response 3b.
- d. SoCalGas objects to the request as vague and ambiguous. Subject to and without waiver of the foregoing objection, SoCalGas responds as follows: SoCalGas has not undertaken any detailed investigation of the many projects on Table 1 but is unaware at this time of any restrictions that would prohibit SoCalGas from procuring gas from them for the RNG Tariff.
- e. Andrew Cheung

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QUESTION 4:

Question 4(a) of TURN Data Request-01, asked “Will the applicants commit not to procure any RNG that involves resale from a grandfathered contract initially executed prior to January 1, 2012,” to which the Sempra Utilities responded “SoCalGas and SDG&E have not proposed this to be a criterion of the RNG Tariff.”

- a. Please clarify this response. Could the Sempra Utilities procure RNG that involves resale of a grandfathered contract initially executed prior to January 1, 2012 under the RNG TARIFF? If not, please identify where this is explicitly committed to in the Application.
- b. Please identify the witness(es) responsible for this answer.

RESPONSE 4:

- a. While the RNG from a grandfathered contract initially executed prior to January 1, 2012 may be eligible for biomethane exemption under the rules and regulations of Cap-and-Trade and the MRR, the Utilities do not intend to initially procure such RNG supplies since there will likely be sufficient supplies that do not fall into this category.
- b. Andrew Cheung

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QUESTION 5:

Page 3:2-5 of the Supplemental Testimony states that “there appears to be a growing realization across the United States that RNG is a viable solution for decarbonizing thermal energy usage and an important tool that will be utilized by those states wishing to reduce their GHG emissions.” In support of this claim, the Supplemental Testimony includes citations to legislation and proceedings in Washington, Utah, Maine, Nevada, and Oregon.

- a. Please provide all evidence that the legislation and proceedings in Washington, Utah, Maine, Nevada, and Oregon cited in the Supplemental Testimony have led to reductions in GHG emissions or will lead to GHG emissions reductions.
- b. Please identify the witness(es) responsible for this answer.

RESPONSE 5:

- a. The Utilities object to this question to the extent it misrepresents the Utilities’ testimony. Notwithstanding this objection, and subject thereto, the Utilities respond as follows. The Utilities provided these citations so that interested parties could understand the growing support in the country for RNG, and view the rationale for passage of legislation or proceeding decisions by the states of Washington, Utah, Maine, Nevada, and Oregon. As an example of specific recognition of the GHG benefits, in the text itself of Oregon’s Senate Bill 98, it notes that “The Legislative Assembly finds and declares that.... Renewable natural gas should be included in the broader set of low carbon resources that may leverage the natural gas system to reduce greenhouse gas emissions.”
- b. Tanya Peacock

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QUESTION 6:

Page 10:3-4 of the Supplemental Testimony states that “the purchased RNG supplies will be verified by a third-party independent verification body.”

- a. Please indicate the name of the verification body that the Sempra Utilities intend to contract with and please provide all communications to date with that body.
- b. If the Sempra Utilities have not yet contracted with a verification body, please indicate when it will secure such a contract.
- c. Please identify the witness(es) responsible for this answer.

RESPONSE 6:

- a. No verification body has been selected. Therefore, the Utilities have no responsive communications.
- b. SoCalGas anticipates we will contract with a verification body sometime in this coming winter/spring of 2020.
- c. Andrew Cheung

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QUESTION 7:

Page 11:4-6 of the Supplemental Testimony states that “[t]he Utilities ... have been reporting their verified GHG emissions through an annual report (‘GHG Report’) for facilities and operations to CARB ... since 2011, receiving a positive verification statement every year.”

- a. Please provide all of the Sempra Utilities’ GHG reports since 2011 and all verification statements Sempra Utilities’ received for such reports.
- b. Please identify the witness(es) responsible for this answer.

RESPONSE 7:

- a. The Utilities object to the request with respect to “all of the Sempra Utilities’ GHG reports since 2011” as the documents requested contain confidential information, including sensitive customer information. However, the Utilities are attaching hereto the annual CARB summaries since 2011 that reflect the Utilities’ total reported data and show the verification statements.



CARB GHG Reports.zip

- b. Andrew Cheung

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QUESTION 8:

Page 12:6-8 of the Supplemental Testimony states that “Section 95852.1.1(a) of the Cap-and-Trade Regulation requires purchase of incremental biomethane supply that will ensure the GHG reductions by the RNG Tariff program are real and additional.”

- a. What is the Sempra Utilities’ definition of “additional” as used in this sentence?
- b. Please explain how purchases of biomethane supply under Section 95852.1.1 result in biomethane production that would not otherwise occur in the absence of procurement under Section 95852.1.1 of the cap-and-trade program.
- c. Please identify the witness(es) responsible for this answer.

RESPONSE 8:

- a. The term “additional” reflects CARB’s eligibility criteria for biomethane exemption under the Cap-and-Trade regulations. This is further explained in the subsequent sentence to the one quoted in Question 8, as stated in the Supplemental Testimony, page 12, starting at line 8. For convenience, the excerpt is provided below:

“Biomass-derived fuel procured under contracts for biogas and biomethane must be either: (A) an increase in the biomass derived fuel production capacity, at a particular site, where an increase is considered any amount over the average production at that site over the last three years; or (B) recovery of the fuel at a site where the fuel was previously being vented or destroyed for at least three years or since commencement of fuel recovery operations, whichever is shorter, without producing useful energy transfer.³”

- b. The Utilities object to this question to the extent it misrepresents the Utilities’ testimony and to the extent it misrepresents the Cap-and-Trade requirements for biomethane. Notwithstanding this objection, and subject thereto, the Utilities respond as follows: The

³ 17 CCR § 95852.1.1 (Eligibility Requirements for Biomass-Derived Fuels). For more information see, CARB, Biomass-Derived Fuels Guidance for California’s Mandatory GHG Reporting Program (2019), available at <https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/biomass.pdf>.

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Cap-and-Trade Regulations established by CARB define what is required for procured RNG to be found as “additional.” SoCalGas will comply with CARB’s Regulations, including the requirement that gas be “additional” as described in Response 8(a).⁴

c. Andrew Cheung

⁴ For more information see Page 9 of the Supplemental Testimony.

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QUESTION 9:

Page 13:19-21 of the Supplemental Testimony states that the “RNG purchased for the RNG Tariff program...will conform to eligibility and reporting requirements of the Cap-and-Trade Regulation and MRR and will therefore reduce SoCalGas’ annual GHG emissions compliance obligation.”

- a. Is it the Sempra Utilities’ position that RNG purchased for the RNG TARIFF program will reduce SoCalGas’ annual GHG emissions compliance obligation and also offset greenhouse gas emissions from subscribers’ gas use?
- b. Please explain how SoCalGas can simultaneously use purchased RNG to reduce its GHG compliance obligation and sell that same RNG to customers to offset emissions from their gas use without double counting emissions benefits.
- c. Please identify the witness(es) responsible for this answer.

RESPONSE 9:

- a. As natural gas distributors and participants in California’s Cap-and-Trade program, the Utilities hold compliance obligations on behalf of their customers that emit less than 25,000 metric tons of carbon dioxide equivalent (MTCO_{2e}). California’s Cap-and-Trade Program determined the point of regulation to be with natural gas suppliers, rather than with individual residential, small commercial and small industrial customers, who are the end-users and where combustion of the fuel occurs. Therefore, when customers elect to participate in the RNG Tariff eligible biomethane purchased by the Utilities on their behalf is exempt from the overall emissions obligation of the natural gas suppliers, as the compliance entity for the end-user. Compliance cost savings will be returned to participating customers on a per-therm basis as a reduction of the RNG commodity rate as described in direct testimony, Chapter 3 (Cheung).
- b. See Response 9a.
- c. Andrew Cheung

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QUESTION 10:

Page 15:8-9 of the Supplemental Testimony states that “[c]ustomers may utilize the annual report or other documentation produced by the Utilities to verify such claims [of sustainability goals or environmental performance standards.]”

- a. Please state what information the Sempra Utilities will include in their annual reports regarding the “environmental attributes” of RNG, claimed reductions of GHG emissions, pollution that results from the production of biomethane, the human health impacts resulting from the production of biomethane including air and water pollutions.
- b. Please state what “other documentation” customers may be provided beyond annual reports.
- c. Please identify the witness(es) responsible for this answer.

RESPONSE 10:

- a. In the annual reports, SoCalGas and SDG&E will report GHG emissions reductions aligned with CARB’s approach for California’s Cap and Trade program. GHG emissions from combustion of eligible biomass fuels will result in zero GHG emissions as per Section 95852.2 of the Regulations for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.
- b. Customers may use their monthly billing statements to track and document RNG purchases.
- c. Grant Wooden

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QUESTION 11:

On Page 17:10, the Sempra Utilities state that “[a]ctual marketing plans have not been created at this time.”

- a. Please indicate when the Sempra Utilities will create “actual marketing plans” and make them available to parties to this proceeding.

- b. Please identify the witness(es) responsible for this answer.

RESPONSE 11:

- a. The Utilities do not plan to schedule the creation of marketing plans until after a decision in A.19-02-015 is issued. Until that time, the tariff details and program design will not be confirmed, and the Utilities will not have an approved account to charge the work. For SDG&E, enrolling customers in the new RNG rate and the creation of marketing plans may also need to wait until after the installation of SDG&E’s new customer information system (CIS) in 2021. SoCalGas and SDG&E have not considered proposing the Commission review marketing materials.
- b. Grant Wooden

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QUESTION 12:

Is it the Sempra Utilities' understanding that it can procure sources of RNG for the RNG TARIFF that also receive credits/are sold under the the Renewable Fuel Standard (40 CFR 80 Subpart M)? Please explain you answer.

- a. Please identify the witness(es) responsible for this answer.

RESPONSE 12:

The Utilities understand the question is asking about the potential for the receipt of RIN credits for RNG purchased for the RNG Tariff. With that understanding, no, RFS credits are only available when fuel is used for transportation. The RNG Tariff is not being offered to transportation customers and therefore will not be eligible for RFS credits, also known as Renewable Identification Numbers (RINs).

- a. Andrew Cheung

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QUESTION 13:

Is it the Sempra Utilities' understanding that it can procure sources of RNG for the RNG TARIFF that are also sold under the Low Carbon Fuel Standard (Cal Code of Regs Title 17, Secs 95480 et seq)? Please explain you answer.

- a. Please identify the witness(es) responsible for this answer.

RESPONSE 13:

The Utilities understand the question is asking about the potential for the receipt of LCFS credits for RNG purchased for the RNG Tariff. With that understanding, no, LCFS credits are only available when fuel is used for transportation. The RNG Tariff is not being offered to transportation customers and therefore will not be eligible for LCFS credits.

- a. Andrew Cheung

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QUESTION 14:

Is it the Sempra Utilities' understanding that it can procure sources of RNG for the RNG TARIFF that are also being used to meet another entity's compliance obligations under the cap-and-trade program (CA Code of Regs Sec. 95852.1.1)? Please explain your answer.

- a. Please identify the witness(es) responsible for this answer.

RESPONSE 14:

The Utilities object to the request as vague and ambiguous. Subject to and notwithstanding the foregoing objection, the Utilities respond as follows: No, given the fact that RNG can satisfy only one entity's compliance obligation under the cap-and-trade program, the Utilities will not procure RNG for the RNG Tariff that is also being used to meet another entity's compliance obligation under the cap-and-trade program.

- a. Andrew Cheung

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QUESTION 15:

The NREL Report, “California Power-to-Gas and Power-to-Hydrogen Near-Term Business Case Evaluation” (Dec. 2016), available at <https://www.nrel.gov/docs/fy17osti/67384.pdf>, on page 59 states that “Senate Bill 1505 in California requires that 33.3% of hydrogen produced for or dispensed by state-funded fueling stations must be made from eligible renewable resources. At present, the majority of the required renewable hydrogen is produced from SMR and coupled with the purchase of biogas credits.” Is it the Sempra Utilities’ understanding that it can procure sources of RNG for the RNG TARIFF that are also being used to meet renewable hydrogen requirements under SB 1505? Please explain your answer.

- a. Please identify the witness(es) responsible for this answer.

RESPONSE 15:

The Utilities understand the question is asking about the potential for the reuse of attributes used for Hydrogen production via SMR with RNG purchased for the RNG Tariff. With that understanding, no, RNG stripped of the credits used for SB 1505 compliance would not be eligible for Cap and Trade compliance and therefore will not be used for the RNG Tariff.

- a. Andrew Cheung

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QUESTION 16:

Page 18:6-7 of the Supplemental Testimony states that “[a]dministrative and marketing costs for the program would be recovered from RNG Tariff program participants via the RNG Tariff program charge per utility.” If a lack of customer subscriptions to the RNG TARIFF preclude full recovery of administrative and marketing cost, will unrecovered costs be borne by the Sempra Utilities’ shareholders?

a. Please identify the witness(es) responsible for this answer.

RESPONSE 16:

The Utilities addressed this issue in the Direct Testimony of Mr. Austria. Please see page 2, lines 8-19. An excerpt of the Direct Testimony is provided below for your convenience:

“The RNG Program Charge may be updated on an annual basis to amortize any under or over collection balance in the Program Charge Subaccount of the RNGTBA for SoCalGas, and in the RNGTBA for SDG&E. The updated RNG Program Charge will be reflected in the Utilities’ Tier 1 advice letters establishing the January RNG Rate. Together, the RNG Commodity Charge and RNG Program Charge create the RNG Rate.

While the Utilities are not proposing an end-date for the RNGT, should the Utilities be ordered to end the program, any remaining balance in the RNGTBA will be addressed in the Utilities’ following general rate case or other applicable proceeding. Upon approval, the Utilities would transfer the RNGTBA residual balances to applicable balancing accounts, as may be directed by the Commission, for amortization in rates and termination of the RNGTBAs.”

a. Reggie Austria

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QUESTION 17:

Please provide data request responses to date from Sempra Utilities to parties in this proceeding.

RESPONSE 17:

All data request responses provided to date are posted on SoCalGas' website:
<https://socalgas.com/regulatory/A19-02-015.shtml>.