

SOUTHERN CALIFORNIA GAS COMPANY
ENERGY SAVINGS ASSISTANCE AND CALIFORNIA ALTERNATE RATES FOR
ENERGY PROGRAMS & BUDGETS FOR PROGRAM YEARS 2021-2026

(A.19-11-006)

(1st DATA REQUEST FROM THE CALIFORNIA EMERGING TECHNOLOGY FUND)

RECEIVED: JUNE 1, 2020

SUBMITTED: JUNE 23, 2020

REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 1:

- a. What communications by type did the Company send by email to its residential customers in the following years: 2017, 2018, 2019? Please be specific about the type of communication it was, for example, billing, outage notification, shut off notice, marketing, and specific program information.
- b. Did the Company send any Public Safety Power Shutoff (PSPS) notices via email or text to its residential customers in 2017, 2018, 2019 or 2020? If so, please provide copies of such notices, and the dates they were issued.
- c. How were PSPS notices sent to persons lacking email addresses or a mobile number for texting?
- d. Did the Company send any messages relating to COVID-19 via email or by text to its residential customers in 2020? If so, please provide copies of such notices and the dates they were issued.
- e. How were COVID-19 messages sent to residential customers who lacked email addresses or mobile numbers for texting?

RESPONSE 1:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous and not limited in scope to the low- income application proceeding. For the purpose of responding to this Request, SoCalGas defines “residential customer” as low-income residential customer. Notwithstanding these objections, SoCalGas responds as follows:

- a. In 2017, 2018, and 2019, SoCalGas sent its residential low-income customers emails with information about how to qualify and ways to apply for its customer assistance programs including CARE and ESA.
- b. PSPS is not applicable to SoCalGas.
- c. PSPS is not applicable to SoCalGas.
- d. Yes, SoCalGas sent the following message related to COVID-19 on CARE and emails and texts to residential customers:

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- “Get help on your bills during these hard times. Here at SoCalGas®, we understand these are difficult times and we want to help you save money wherever possible.” Sent via email on 5/14/20 and 6/15/20.
 - “If your income has recently changed apply for CARE at socialgas.com/savings.” “If you’re facing unexpected hardships such as job or income loss, apply for CARE at socialgas.com/savings.” Sent via text in April and May 2020.
 - e. A COVID-19 related message was sent for CARE on the customer bill.

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QUESTION 2:

Does a residential customer of the Company have an option to receive communications from the Company by email? By text?

RESPONSE 2:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous and not limited to the scope of the low-income application proceeding. For the purpose of responding to this Request, SoCalGas defines “residential customer” as residential low-income customer. Notwithstanding these objections, SoCalGas responds as follows:

Yes, a residential low-income customer has the option to receive communications from the Company by email and text.

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QUESTION 3:

Does the Company make efforts to obtain the email addresses or mobile numbers of its residential customers in order to communicate by email or text to such customers?

- a. What methods does the Company use to obtain email addresses of a customer?
- b. What methods does the Company use to obtain mobile phone numbers for the purpose of texting information to a residential customer?
- c. Has a financial analysis been done as the reduced cost of communicating to a residential customer by email or text versus the cost of sending communications via US mail?

RESPONSE 3:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous and not limited to the scope of the low-income application proceeding. For the purpose of responding to this Request, SoCalGas defines “residential customer” as low-income residential customer. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas does not make specific efforts to obtain email addresses or mobile numbers of its residential low-income customers.

- a. SoCalGas uses existing customer email addresses provided by the customer when the customer establishes gas service. In addition, SoCalGas uses a secondary message to CARE customers that recommends the customers update their contact information. When customers ask for payment arrangements or for various customer orders, if the customer’s email address is not contained in the Customer Information System, SoCalGas solicits this information at that time.
- b. SoCalGas uses existing customer mobile phone numbers provided by the customer when the customer establishes gas service. In addition, SoCalGas uses a secondary message to CARE customers that recommends the customers update their contact information. When customers ask for payment

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arrangements or for various customer orders, if the customer's mobile number is not contained in the Customer Information System, SoCalGas solicits this information at that time.

- c. No, SoCalGas has not prepared or obtained a financial analysis.

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QUESTION 4:

How many of the Company's residential customers have given the Company an email address?

RESPONSE 4:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous, does not state what time period is in question, and is not limited to the scope of the low income application proceeding. For the purpose of responding to this Request, SoCalGas defines "residential customer" as low-income residential customer and limits the time period to the previous 2017-2019 low income application cycle. Notwithstanding these objections, SoCalGas responds as follows:

As of June 4, 2020, SoCalGas had approximately 1.2 million active CARE residential customers with a valid email address in Customer Information System customer profile or MyAccount.

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QUESTION 5:

How many of Company's residential customers have given the Company a mobile number for the purpose of allowing the Company to text the customer's device?

RESPONSE 5:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous, does not state what time period is in question, and is not limited to the scope of the low income application proceeding. For the purpose of responding to this Request, SoCalGas defines "residential customer" as low-income residential customer. Notwithstanding these objections, SoCalGas responds as follows:

As of June 4, 2020, SoCalGas had approximately 1.3 million active CARE residential customers with a phone number in Customer Information System customer profile's cell phone number field.

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QUESTION 6:

Regarding the answers to questions 4 and 5 above, what percentage does this represent of all residential customers by the category of email and mobile phone number?

RESPONSE 6:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous and not limited to the scope of the low income application proceeding. For the purpose of responding to this Request, SoCalGas defines “residential customer” as residential low-income customer. Notwithstanding these objections, SoCalGas responds as follows:

As of June 4, 2020, the percentages of SoCalGas’s CARE residential customers with mobile phone number, email or both is as follows:

- Mobile Phone: 79.41%
- Email: 73.54%
- Both: 64.56%

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QUESTION 7:

How many programs of the Company allow a residential customer to create a login to access his or her account information online?

- a. Please provide a list of these Company programs referenced in the answer to question 7.
- b. Please indicate whether a customer who creates a login to his or her program account has more, the same, or less data than a customer who does not have access to an online account, as to programs referenced in the answer to Question 7.

RESPONSE 7:

- a. SoCalGas' "My Account" allows residential customers to create a login to access their account information through an online portal if the customer has an email account.
- b. A customer with access to My Account has access to more data on energy usage. For example, customers who have a My Account portal can login to the portal and review their daily and hourly usage and perform energy efficiency analyses through the "Analyze Usage" feature.

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QUESTION 8:

Does the Company send any bills to residential CARE customers by email?

- a. What are the costs to the Company to mail hard copy paper bills to CARE customers?
- b. What is this cost (mailing a hard copy bill to CARE customers) on a per customer basis?
- c. What is the cost of mailing hard copy bills to CARE customers as to all residential CARE customers?
- d. What percentage of customers in the CARE program receive their bill via email versus mail?

RESPONSE 8:

Yes, SoCalGas residential CARE customers can enroll in paperless billing and receive a bill notification by email.

- a. SoCalGas objects to this Request on the grounds that it requests proprietary and commercially sensitive vendor pricing information that should remain confidential.
- b. SoCalGas objects to this Request on the grounds that it requests proprietary and commercially sensitive vendor pricing information that should remain confidential.
- c. The cost of mailing hard copy bills to CARE customers as to all residential CARE customers is the same.
- d. The percentage of customers in the CARE program that receive their bill via email versus mail is 43.8%.

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QUESTION 9:

For Company's CARE program, what percentage of the customers on this program have provided the Company with a mobile phone number for the purpose of the Company texting information to them?

a. What percentage of the total of such CARE subscribers does this represent?

RESPONSE 9:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and unduly burdensome and does not state what time period is in question. For the purpose of this response, SoCalGas limits the time period to the previous 2017-2019 low income application cycle. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas does not request mobile phone numbers from its CARE customers for the purpose of texting information to them.

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QUESTION 10:

What is the cost to the Company to send a bill or information by email to a residential customer?

- a. How does the cost of sending a bill or information to a residential customer by email compare to the cost of sending the same bill or information to the customer by mail?

RESPONSE 10:

SoCalGas objects to this Request on the grounds that it requests proprietary and commercially sensitive vendor pricing information that should remain confidential.

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QUESTION 11:

For Company's FERA program, what percentage of the customers on this program have provided the Company with an email address or mobile phone for texting?

- a. What percentage of the total of such FERA subscribers does this represent?

RESPONSE 11:

Not applicable to SoCalGas.

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QUESTION 12:

For Company's ESA program, what percentage of the customers on this program have provided the Company with an email address or mobile phone for texting?

- a. What percentage of the total of such ESA subscribers does this represent?

RESPONSE 12:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and unduly burdensome and does not state what time period is in question. For the purpose of this response, SoCalGas limits the time period to the previous 2017-2019 Low Income application cycle. Notwithstanding these objections, SoCalGas responds as follows:

The nature of the ESA Program is that customers treated through ESA do not remain "subscribers" to the program and, unlike the CARE Program, there is not a specific number of customers "on" the program. Rather, the program enrolls and provides measures to a customer over a relatively short period of time, and then moves on to other customers.

When enrolling customers in the ESA Program, SoCalGas requests the customer's contact information for use during the engagement. Customers are allowed to provide one or more phone numbers and may also provide an e-mail address. SoCalGas does not record in its systems whether the phone numbers are mobile phones or whether they can receive text messages.

For the completed years in the current program cycle, 2017-2019, SoCalGas has reported a total of 315,284 homes treated. Of that number, 44,825 or 14% have provided e-mail addresses. The table below provides annual details.

Program Year	Treated Homes	Email Recorded	Percentage
2017	93,790	5,645	6%
2018	99,457	19,477	20%
2019	122,037	19,703	16%
TOTAL	315,284	44,825	14%

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QUESTION 13:

How many CARE customers participate in load management and remote dispatch programs?

RESPONSE 13:

SoCalGas objects to this Request on the grounds that it is overly broad, vague and does not state what time period is in question. For the purpose of this response, SoCalGas limits the time period to the previous 2017-2019 Low Income application cycle. Notwithstanding these objections, SoCalGas responds as follows:

During the winter season, customers with qualifying smart thermostats were eligible to participate in the Smart Therm Program, SoCalGas' load management & dispatch program. As of February 28, 2020, this program closed indefinitely. When the program was still operational during the 2018-2019 winter timeframe, there were approximately 5,611 CARE customers enrolled on the program.

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QUESTION 14:

How many ESA customers who have received weatherization assistance and remote dispatch programs from the Company have provided email addresses to the Company?

RESPONSE 14:

SoCalGas objects to this Request on the grounds that it is overly broad, vague and does not state what time period is in question. For the purpose of this response, SoCalGas limits the time period to the previous 2017-2019 Low Income application cycle. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas does not have any ESA Program customers who have received weatherization assistance and remote dispatch programs from SoCalGas.

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QUESTION 15:

Does the Company enter into any type of agreement with Community-Based Organizations (CBOs) to assist it in signing up residential subscribers for its CARE, FERA or ESA programs?

- a. If so, is one of the pieces of information that the CBOs gather from new subscribers to the CARE, FERA or ESA programs the new subscriber's email or mobile phone number?
- b. What is the business or other purpose of gathering the subscriber's email or mobile phone number?
- c. Which CBOs has Company entered into agreements to assist in signing up residential customers for its CARE, FERA or ESA program in 2017, 2018, 2019 and 2020?

RESPONSE 15:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous by not defining "subscribers". For the purpose of responding to this Request, SoCalGas defines "subscribers" as low-income residential customer. Notwithstanding these objections, SoCalGas responds as follows:

Yes

- a. No, email or mobile phone numbers are not gathered from new program participants.
- b. Not applicable.
- c. The attached file contains a list of organizations for which SoCalGas has entered into a Memorandum of Understanding or Service Agreement with to sign up residential customers or to build awareness on programs in 2017 – 2020.



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QUESTION 16:

Has any entity or person requested that the Company assist in providing information on how to sign up for affordable Internet offers?

- a. If yes, who was the entity or person, when did this request occur, and what was the Company's response?
- b. Identify the Company personnel who were involved in this interaction and who directed the response.

RESPONSE 16:

Yes. CETF and United Way of California in partnership with CBOs.

- a. CETF made the request to launch a pilot to promote affordable broadband. SoCalGas and CETF had a series of telephone conversations and discussions regarding the pilot, and a pilot was conducted in 2018. The pilot consisted of the inclusion of affordable broadband messaging to letters sent to a limited amount of CARE customers. All costs were covered by CETF for the pilot. In addition, United Way sent the attached letter to SoCalGas and the IOUs on September 16, 2019, requesting financial support; however, SoCalGas did not enter into a partnership.
- b. SoCalGas did not maintain email or telephone records of the personnel involved in the discussions.



CBO Mobilization
Letter FINAL_190913.

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QUESTION 17:

Did the Company's managers or employees conduct any meetings to consider requests by CETF and CBOs in the time era between July 1, 2019 and November 4, 2019 requesting incorporation of distribution of affordable home Internet service offers to low-income persons to the Company's CARE-ESA plan submitted on November 4, 2019?

- a. What were the names of the employees or managers who were in the meetings?
- b. What considerations and conclusions did they draw after considering the CETF and CBO requests as referenced above?
- c. What analysis was conducted on requests by CETF and CBOs relating to distribution of affordable home Internet service offers to the Company's CARE – ESA plan?
- d. What was the projected cost to Company to implement the CETF and CBO's request on including affordable home Internet offers to low-income persons as to the Company's CARE – ESA plan?
- e. What was the financial basis for rejecting or declining the CETF and CBOs requests relating to incorporating distribution of affordable home Internet service offers?
- f. How did they communicate their decision to CETF or the CBO's on the request to incorporate distribution of affordable home Internet service offers?

RESPONSE 17

SoCalGas objects to this Request on the grounds that the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, and seeks information that would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates. Furthermore, determining the name of each employee or manager who participated in meetings for a five-month period would be overly burdensome, overly broad and unnecessarily time-consuming. SoCalGas will not respond to this question.

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Revised Response

This Amended Response is made in a good faith effort to clarify the previously stated objections and answers.

SoCalGas objects to this Request on the grounds that the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, and seeks information that would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates. Furthermore, determining the name of each employee or manager who participated in meetings for a five-month period would be overly burdensome, overly broad and unnecessarily time-consuming. Notwithstanding these objections, SoCalGas responds as follows:

Upon a more detailed review, a SoCalGas employee found an email to set a meeting with CBO – Southeast Community Development Corporation (SCDC). The meeting was scheduled for November 4, 2019 but the employee does not recall if the meeting took place as the employee had a family emergency that day.

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QUESTION 18:

What conversations and / or consultations did the Company have with other IOUs (such as Pacific Gas & Electric Company, San Diego Gas & Electric, and/or Southern California Edison) regarding the requests from CETF and CBOs relating to incorporating distribution of affordable home Internet service offers to low-income persons in the IOU's CARE-ESA programs?

- a. When did such consultations take place? Please list date and participants in consultation.
- b. What was discussed as to the CETF and CBO's requests referenced in Question 18?
- c. What conclusions were reached and why?
- d. What financial considerations or analysis was done as to any decision on the CETF/CBO requests?

RESPONSE 18:

SoCalGas objects to this Request on the grounds that the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, and seeks information that would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates. Furthermore, determining the dates and participants for conversations and consultations over unspecified periods would be overly burdensome, overly broad and unnecessarily time-consuming. SoCalGas will not respond to this question.

Revised Response

This Amended Response is made in a good faith effort to clarify the previously stated objections and answers.

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SoCalGas did not have any conversations or consultations with the other IOUS relating to incorporating distribution of affordable home internet service offers to low-income customers for the CARE-ESA program.

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QUESTION 19:

What conversations did employees of the Company have with members of the Low Income Oversight Board (LIOB) and/or CPUC Commissioners regarding the requests of CETF and CBOs relating to incorporating distribution of affordable home Internet service offers to low income persons in the Company's service areas as part of the Company's CARE-ESA program?

- a. What Company employee had the conversations and with what members of the LIOB or the Commission?
- b. What was the substance of the conversation between such Company employee and the LIOB or Commission member?

RESPONSE 19:

SoCalGas objects to this Request on the grounds that the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, and seeks information that would reveal relationships and strategic business choices made by SoCalGas and others with whom it associates. Notwithstanding these objections, SoCalGas responds as follows:

None.

SOUTHERN CALIFORNIA GAS COMPANY
ENERGY SAVINGS ASSISTANCE AND CALIFORNIA ALTERNATE RATES FOR
ENERGY PROGRAMS & BUDGETS FOR PROGRAM YEARS 2021-2026

(A.19-11-006)

(1st DATA REQUEST FROM THE CALIFORNIA EMERGING TECHNOLOGY FUND)

RECEIVED: JUNE 1, 2020

SUBMITTED: JUNE 23, 2020

REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 20:

On the Company's low-income program website(s), does it also provide information for low-income consumers to other low-income programs of other California utilities, telecommunications, or broadband companies?

- a. If so, please provide the weblinks to those pages, and explain which low-income programs are referenced or linked.

RESPONSE 20:

Yes.

- a. The California Lifeline Program is referenced on www.socalgas.com/care. The Low-Income Home Energy Assistance Program (LIHEAP) is referenced on www.socalgas.com/liheap.

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RECEIVED: JUNE 1, 2020

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REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 21:

In the Company's marketing plan for the CARE-ESA program in the above-referenced application, will it include in-language and in-culture marketing to low-income, disadvantaged, minority, and non-English speaking communities?

- a. If so, please describe how the marketing plan, whether it includes online marketing techniques, and in what languages (oral or written).

RESPONSE 21:

Yes

- a. Please see SoCalGas 2021-2026 Application, Testimony of Mark Aguirre, *Marketing Education & Outreach Design and Delivery* section, pages 80-89, and Testimony of Octavio Verduzco, section C.1.e. pages 15-22, section C.1.f. 24-27, D.1.f. pages 33-36, 2.a-b pages 37-42, 3.a-b pages 43-45.

<https://www.socalgas.com/regulatory/A19-11-006>

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REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 22:

In the Company's advertising plan for the CARE-ESA program in the above-referenced application, will it include in-language and in-culture marketing to low-income, disadvantaged, minority, and /or non-English speaking communities?

- a. If so, please describe whether the advertising plan will include online advertising techniques, and in what languages (oral or written).

RESPONSE 22:

Yes

- a. Please see SoCalGas 2021-2026 Application, Testimony of Mark Aguirre, pages 84-85, and Testimony of Octavio Verduzco, *Mass Marketing and Collateral* section, pages 18-19. The exact media mix for both the ESA and CARE advertising campaigns will be determined after the application and budget have been approved.

<https://www.socalgas.com/regulatory/A19-11-006>

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RECEIVED: JUNE 1, 2020

SUBMITTED: JUNE 23, 2020

REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 23:

Has the Company made any efforts in the last five years to increase the email and smartphone information it has for its residential subscribers for the purpose of communications?

- a. If so, for what business purpose was this effort made? What date?
- b. If so, how successful was this effort in terms of numbers and percentages of subscribers?
- c. If so, does the Company intend to continue to collect email and smartphone information from its residential subscribers?
- d. Who are the Company personnel making these decisions on communications via email and texting?

RESPONSE 23:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous by not defining “subscribers” and not limited in scope to the low-income application proceeding. For the purpose of responding to this Request, SoCalGas defines “residential subscribers” as low-income residential customers. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas has not made specific efforts in the last five years to obtain email addresses or mobile numbers of its residential low-income customers.

- a. SoCalGas has no information responsive to this request.
- b. SoCalGas has no information responsive to this request.
- c. SoCalGas has no information responsive to this request.
- d. Decisions are made by SoCalGas’ marketing and communications department.

SOUTHERN CALIFORNIA GAS COMPANY
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SUBMITTED: JUNE 23, 2020

REVISED RESPONSE SUBMITTED: JULY 17, 2020 (Q17 and Q18)

QUESTION 24:

Has the Company made any efforts to improve digital literacy and digital education for its residential subscribers when it has a program where online access to the account and its data is available for Company's subscribers?

- a. If so, what efforts were made? What was the cost to the Company of such efforts? What was the result of such program?
- b. If not, what is the reason why the Company has not engaged in digital literacy efforts for its customers if its programs provide data for customers with online access?

RESPONSE 24:

SoCalGas objects to this Request on the grounds that it is overly broad, vague, and ambiguous by not defining "subscribers" and not limited in scope to the low-income application proceeding. For the purpose of responding to this Request, SoCalGas defines "residential subscribers" as low-income residential customers. SoCalGas additionally objects to this Request on the grounds that the Request does not define digital literacy and residential subscribers. Notwithstanding these objections, SoCalGas responds as follows:

SoCalGas responds as follows with an example of digital education for its residential customers.

<https://www.socalgas.com/pay-bill/understanding-your-bill/how-to-read-your-bill>