



JOINT STEERING COMMITTEE
U.W.U.A. - I.C.W.U.C



7200 Greenleaf Ave., Suite 380
Whittier, California 90602
(562) 696-0142

3200 Inland Empire Blvd., Suite 160
Ontario, California 91764
(909) 476-1855

Sent via Fax and U.S. Mail

October 12, 2011

Southern California Gas Company
555 W. 5th Street
Los Angeles, CA 90013

Attention: Sara Franke, Director of Labor Relations

RE: INFORMATION REQUESTS

Dear Ms. Franke:

On October 11, 2011, the Company put a "Last, Best and Final Comprehensive Package Offer" on the table. However, the Company has not provided responses, or has provided inadequate responses, to a large number of information requests from the JSC. Those requests are outstanding and in significant respects have impaired, and continue to impair, the Union's ability to analyze the Company's proposals and bargain. The Company's refusal and delay in providing information is critical now, with the Company's making a LBF without fulfilling its bargaining obligations to provide requested information. The JSC needs full information to bargain over the LBF; until the JSC receives the requested information, it cannot fully evaluate the LBF or make further proposals.

Without prejudice to the Union's taking necessary action concerning the Company's refusal and delay in providing information, the JSC requests that the Company immediately provide full responses to the following outstanding information outstanding requests for information for bargaining a new CBA:

September 20, 2011, letter re: INFORMATION REQUESTS 7/9/11 Information Request/Company Response 8/1/11

With respect to this letter, the Company has not provided full gender, ethnicity, and marital status information in response to item 5 of this request, first made July 9. The Union requested this information generally, giving as examples issues related to the call centers and leave proposals. Notwithstanding the Company's "Last, Best and Final Comprehensive Package Offer," proposals related to these subjects by both the

Letter to Sara Franke
October 12, 2011
RE: INFORMATION REQUESTS
Page 2.

Company and the Union remain on the table. The requested data is also pertinent to analysis of the Company's retirement and retirement health proposals. In any event, as the Union has reiterated, the information pertains to bargaining unit employees and is presumptively relevant.

The Company has not provided the information requested in response to item 6 of the July 9, 2011, letter, even though the Company still has on the table a proposal to give unlimited discretion to supervisors and managers (now grouped in the Company's proposal in districts and departments) to set absence call-in policies. This request asks for all policies. The Company has not provided call-in policies as expressly requested.

In bargaining, you indicated that the Company does not intend to respond further to information requests to which it has already responded in part. Please either provide the information in full or confirm your refusal.

September 23, 2011 letter re: INFORMATION REQUESTS 6/16/11 Information Request/Company Response 8/30/11

Numerous issues concerning union representation remain, e.g., C-3, to which the information in items 3, 4, and 5 in this letter are relevant. Please respond to the reiterated and additional requests for information therein.

**September 28, 2011 letter re: INFORMATION REQUESTS
8/22/11 Information Request/Company Response 9/2/11
8/22/11 Information Request/Company Response 9/13/11
Attachment to 9/13/11 letter re C-43 (8/4/11): Actuarial Valuation
Report C-43 (8/4/11) and 8/22/11 Information Request/Company
Response 9/15/11**

The Company has not responded to numerous requests in this letter, which summarizes requests made on August 22, to which no response was made or an inadequate response was received and contains additional related requests. This letter contains reiterated requests related to proposals in the Company's LBF, including C-3, C-14, C-17, C-43, and C-45. This letter contained additional requests related to C-3, C-43, and the Actuarial Valuation Report. The Union continues to expect responses.

Letter to Sara Franke
October 12, 2011
RE: INFORMATION REQUESTS
Page 3.

**September 28, 2011 letter re: INFORMATION REQUESTS
8/31/11 Information Request/Company Responses 9/9/11 and 9/20/11**

The benefit issues and proposals which are the subject of these requests are still on the table, and the Union requests that the Company respond in full and immediately.

**September 28, 2011 letter re: INFORMATION REQUESTS
9/1/11 Information Request re C-18 (8/31/11)/Company Response
9/14/11**

This letter concerns the Catastrophic Sickness Allowance, which remains an issue between the parties, and is included in the Company's LBF, C-16. This information is important to the Union's ability to bargain over this contentious issue.

**September 28, 2011 letter re: INFORMATION REQUESTS
C-23 (8/30/11) and C-30, 30a-e: and C-35 (9/8/11) and C-42 (8/3/11)
And C-50 (8/3/11) and C-52 (8/3/11) and C-62 and C-68 (8/30/11)
Appendix D Pension Benefit Agreement Revisions
U-17 (8/27/11) and Company Counterproposal (9/1/11)**

The Company has not responded to this letter. Although the Company has offered to withdraw C-23, the same language remains in C-33. The information requested pertains to bidding and concerns a mandatory subject.

In addition, without conceding the need for the other information requested, C-50, 52, 68, Appendices D and E, and the issue of management V assignments remain in the Company's LBF proposal, and U-17 also remains on the table. The Union requests that the Company respond fully and immediately to the requests in the letter related to these proposals, provisions, and documents.

Letter to Sara Franke
October 12, 2011
RE: INFORMATION REQUESTS
Page 4.

“Last, Best and Final Comprehensive Package Offer,”

Finally, there are new proposals for the first time in the LBF, such as the pension proposal. In addition, the Union may need certain further information, either on the basis of what is provided as requested above or based on more recent proposals than its information requests. The JSC is diligently working on this and expects to have any such information requests to you forthwith.

The Union has no desire to delay bargaining: The Company was regularly providing information, however selectively, until late September, and then stopped.

Please provide this information **immediately** so that the Union will have information to enable it to bargain intelligently about the Company's LBF and the many proposals which remain on the table.

Sincerely,



ARTURO FRIAS
Chair, JSC