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March 31, 2023

Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Subject: Request for Extension of Time to Comply with December 5, 2022
Executive Director Letter Regarding the Ventura Compressor
Modernization Project**

Dear Ms. Peterson:

Pursuant to Rule 16.6 of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, Southern California Gas Company (SoCalGas) hereby requests an extension of time to comply with the direction provided in your December 5, 2022 letter regarding the expected timing for submitting a consolidated Ventura Compressor Modernization (VCM) Project application. This letter requests authorization to submit a draft Proponent's Environmental Assessment (PEA) for the VCM Project by May 24, 2023, with the related Certificate of Public Convenience and Necessity (CPCN) application to be filed no earlier than three months later, in compliance with General Order (GO) 177.

Background

On November 23, 2022, SoCalGas wrote to the Commission seeking guidance regarding compliance with the Assigned Commissioner's Scoping Memo and Ruling in the Consolidated General Rate Case (GRC) Applications (A.) 22-05-015 and 22-05-016 related to the VCM Project. Specifically, that letter asked the Commission to either (a) confirm whether SoCalGas should strictly comply with the Scoping Memo regarding the expected timing of filing a VCM Project application or (b) in the alternative grant, pursuant to Rule 16.6, an extension of time to comply with both the GRC Scoping Memo and the then-pending GO 177 in a consolidated manner. At the time SoCalGas submitted that letter, it was not known how long it would take to prepare a PEA and CPCN application in compliance with GO 177, because the GO was not yet final and

because such an endeavor had never been undertaken. Therefore, SoCalGas sought to provide an update as to the anticipated timing of such an application by the end of 2022.

In a letter response to SoCalGas on December 5, 2022, the Commission found it would be an efficient use of the Commission's, intervenors', and SoCalGas's resources to work on a consolidated application rather than review the same information in separate filings to be consolidated later, and therefore granted SoCalGas an extension of time to file a consolidated VCM Project application to comply with the GRC Scoping Memo and the new GO within 120 days of the issuance of GO 177, which had just been adopted by D.22-12-021 at the CPUC's December 1, 2022 business meeting. The new GO was ultimately issued on December 8, 2022, making the deadline to file the application April 7, 2023.

As requested by your December 5 letter, SoCalGas notified the Deputy Executive Director for Energy and Climate Policy on December 30, 2022, that we were diligently engaged in preparing a CPCN Application for the VCM Project consistent with the requirements of both the GRC Scoping Memo as well as GO 177, aiming to file by April 7, 2023, and that we would advise the CPUC if the timeframe became impacted.

Request for Extension of Time

The VCM Project will be the first CPCN application filed with the CPUC pursuant to the new GO 177. SoCalGas has undertaken enormous efforts to produce a PEA and CPCN application within the timeline contemplated by your December 5, 2022, letter. SoCalGas agrees with your assessment that "(i)n addition to the safety and reliability of an upgraded system, the communities north of Ventura rely on gas supplies from the compressor station," and understands that because of this, an application needs to be filed "within a reasonable time to avoid delay in the Commission's project review." To that end, SoCalGas has: 1) neared completion of a comprehensive PEA; 2) met with CPUC CEQA staff to review the forthcoming application; and 3) continued to engage and communicate with the community by holding public meetings in March 2023 regarding the current status and next steps on the project.

Notwithstanding these substantial efforts, SoCalGas seeks additional time to submit a draft PEA to CPUC CEQA staff. This additional preparation time balances the urgency and critical importance of this project with the need to bring a comprehensive submission to, ultimately, reduce project costs, conserve stakeholder resources, and be responsive to the community who requested a comprehensive environmental review. At this time, SoCalGas anticipates that timing to be by May 24, 2023; however, SoCalGas recommends that we work with CEQA staff to determine the appropriate time to submit a draft PEA, which is consistent with how such a project would typically be brought to the CPUC.

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D.22-12-021 and GO 177 provide that except for CPCN applications filed within 120 days from its issuance, gas corporations are required to submit a draft PEA at least three months prior to filing a CPCN application.¹ Thus, providing the PEA to the Commission's CEQA division on May 24, 2023 would mean an application could be filed on or after August 24, 2023. SoCalGas would continue to work closely with CPUC CEQA staff and other stakeholders during this time between submitting the draft PEA and filing the CPCN application.

SoCalGas has notified the CPUC's Energy Division, including CEQA staff, of this request.

Thank you for your consideration.

Sincerely,

/s/Joseph Mock
Joseph Mock
Director - Regulatory Affairs

cc: Administrative Law Judge Division to aljextensionrequests@cpuc.ca.gov
EDTariffUnit@cpuc.ca.gov
Service List A.22-05-015/A.22-05-016 (SoCalGas GRC)
Service List R.20-01-007 (Gas Planning OIR)
Jean Spencer, CPUC Energy Division
Mary Jo Borak, CPUC Energy Division
Michael Rosauer, CPUC Energy Division

¹ See GO 177 Section VI.C. See also D.22-12-021 at 74 and 93 (Finding of Fact 39).