

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Southern California Gas  
Company (U 904 G) to Submit Its 2025 Risk  
Assessment and Mitigation Phase Report.

Application No. 25-05-XXX

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) TO  
SUBMIT ITS 2025 RISK ASSESSMENT AND MITIGATION PHASE REPORT**

Holly A. Jones  
Southern California Gas Company  
555 West Fifth Street, Suite 1400  
Los Angeles, CA 90013  
Telephone: (213) 244-2232  
Fax: (213) 629-9620  
Email: hajones@socalgas.com

May 15, 2025

*Counsel for Southern California Gas Company*

## **TABLE OF CONTENTS**

	<u>Page</u>
I. INTRODUCTION .....	1
II. GUIDING PRINCIPLES .....	2
III. BACKGROUND AND PROCEDURAL HISTORY.....	4
IV. CONSOLIDATION OF SOCALGAS’S AND SDG&E’S RAMP APPLICATION PROCEEDINGS .....	6
V. OVERVIEW OF SOCALGAS’S AND SDG&E’S RAMP REPORTS.....	7
VI. ROADMAP OF CHAPTERS WITHIN THE REPORT .....	8
VII. STATUTORY AND PROCEDURAL REQUIREMENTS.....	10
A. Rule 2.1(A) - Legal Name .....	10
B. Rule 2.1(b) - Correspondence .....	10
C. Rule 2.1(c).....	11
D. Rule 2.2 - Articles of Incorporation .....	12
VIII. SERVICE .....	13
IX. RELIEF SOUGHT .....	13
X. CONCLUSION.....	14

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Southern California Gas Company  
(U 904 G) to Submit Its 2025 Risk Assessment and  
Mitigation Phase Report.

Application No. 25-05-XXX

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) TO  
SUBMIT ITS 2025 RISK ASSESSMENT AND MITIGATION PHASE REPORT**

**I. INTRODUCTION**

In compliance with California Public Utilities Commission (Commission or CPUC) Decisions (D.) 14-12-025, D.16-08-018, D.18-12-014, D.20-01-002, D.21-11-009, D.22-10-002, D.22-12-027, D.24-05-064, and the Commission’s Rules of Practice and Procedure (Rules), Southern California Gas Company (SoCalGas) hereby submits its 2025 Risk Assessment and Mitigation Phase (RAMP) Application and attached RAMP Report, the first step in the submission of its test year (TY) 2028 General Rate Case (GRC). D.20-01-002 (the Rate Case Plan Decision) requires SoCalGas and San Diego Gas & Electric Company (SDG&E) to concurrently file their RAMP Applications and Reports by May 15 of the year falling three years prior to the next future GRC test year – in this case, 2028.<sup>1</sup>

The SoCalGas RAMP Report’s primary purpose is to “examine [SoCalGas’s] assessment of its key risks and its proposed programs for mitigating those risks.”<sup>2</sup> SoCalGas’s RAMP Report describes SoCalGas’s diligent preparation and compliance with applicable decisions, as shown in the roadmap provided in Appendix 2 to the 2025 RAMP Report. SoCalGas remains mindful of its duties to prioritize safety and to “furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities [...] as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”<sup>3</sup>

---

<sup>1</sup> D.20-01-002 at 49 (Table 3: Adopted Revised GRC Application Filing Schedule). SoCalGas and SDG&E will concurrently file their respective TY 2028 GRC applications on May 15, 2026. *Id.*

<sup>2</sup> D.14-12-025 at 31 (citation omitted).

<sup>3</sup> Pub. Util. Code § 451.

In addition to describing SoCalGas's compliance with the CPUC's prescribed RAMP processes and methodologies, SoCalGas's RAMP Report provides qualitative information essential to understanding the quantitative assessments required by the Commission decisions, and how SoCalGas approaches risk.

The 2025 RAMP Report is SoCalGas's fourth RAMP filing, following the 2016, 2019, and 2021 RAMP Reports.<sup>4</sup> SoCalGas's last RAMP Report was submitted on May 15, 2021, and was the first to present safety risks in the manner required under D.18-12-014 and the Settlement Agreement adopted therein (collectively, the Settlement Decision).<sup>5</sup> Since the time of filing SoCalGas's 2021 RAMP Application and Report, the Commission has issued four separate decisions in Rulemaking (R.) 20-07-013 – D.21-11-009, D.22-10-002, D.22-12-027, and D.24-05-064 – which provide additional modifications to the CPUC's Risk-Based Decision-Making Framework (RDF), including the rules governing RAMP submissions. Pacific Gas and Electric Company (PG&E) was the first utility to submit a RAMP Report under D.21-11-009 and D.22-12-027, and PG&E's 2024 RAMP Report and the feedback it has received have informed SoCalGas and SDG&E in preparing their 2025 RAMP Reports. SoCalGas and SDG&E are the first utilities to submit a RAMP Report under the new requirements of D.24-05-064. A summary of the relevant decisions and procedural history of the RDF is provided below.

## **II. GUIDING PRINCIPLES**

SoCalGas's risk-informed decision-making is guided foremost by a commitment to delivering safe and reliable energy to customers at a reasonable cost. This commitment includes the prevention of catastrophic, serious injury or loss-of-life events, protracted service interruptions, and the associated financial losses to customers and the public that may stem from

---

<sup>4</sup> After the filing of the Companies' 2019 RAMP reports, which were intended to inform their respective TY 2022 GRCs, the Commission issued the Rate Case Plan Decision, which modified the GRC cycles of the large energy utilities, eliminating the Companies' TY 2022 GRCs. The Commission issued D.20-09-004, which closed the 2019 RAMP proceeding and clarified that the Companies' respective 2019 RAMP Reports would not be integrated into each Company's next GRC application.

<sup>5</sup> D.18-12-014 adopted the Settlement Agreement with modifications and continued and modified requirements previously established in D.16-08-018 and the risk-based decision-making frameworks adopted in D.14-12-025.

such events.<sup>6</sup> As part of its risk-informed decision-making, SoCalGas accounts for the potential for far-ranging impacts from high-consequence risk events that may occur less frequently. Accordingly, certain risk mitigations included in the RAMP Report are pivotal in preventing or minimizing the potential for serious safety events – what is referred to as “tail risk” events – even when mitigation of such events is not fully accounted for by the RDF’s prescribed quantitative RAMP modeling. Accordingly, and in addition to meeting RDF requirements for evaluating mitigations, SoCalGas endeavors to describe supplemental criteria and considerations, including its commitment to mitigate serious safety events, in the risk chapter descriptions, consistent with the Commission’s recognition that various factors may influence selection of risk mitigations.<sup>7</sup>

SoCalGas is committed to continuous improvement in risk-informed decision making to advance the effectiveness of its risk mitigation activities for the benefit of customers, the public, the environment, employees, and contractors while continuing to deliver safe and reliable energy customers at an affordable cost.<sup>8,9</sup> To that end, this RAMP filing reflects SoCalGas’s

---

<sup>6</sup> See R.20-07-013, SoCalGas and SDG&E’s Joint Reply Comments to S-MAP Phase 4 Workshop #2 (January 16, 2025) at 10 (“the primary goal of risk management is to constrain risk outcomes to tolerable levels, which is why risk tolerance is the first constraint to observe in evaluating mitigations (not cost).”).

<sup>7</sup> D.22-12-027, RDF Row 26 (“Mitigation selection can be influenced by other factors including, but not limited to, funding, labor resources, technology, planning and construction lead time, compliance requirements, Risk Tolerance thresholds, operational and execution considerations, and modeling limitations and/or uncertainties affecting the analysis.”).

<sup>8</sup> SoCalGas’s bills have been in the lowest quartile nationwide, and based on statewide averages, natural gas supplies about 65% of household energy while only representing about 25% of household utility energy bills. Refer to data regarding top 50 IOUs by total customers (Average of 2020-2023), e.g., American Gas Association (AGA), *2023 Ranking of Companies By Total Sales Customers*, available at: [https://www.aga.org/wp-content/uploads/2025/01/1002TOTCUST\\_Paul-Pierson-2.pdf](https://www.aga.org/wp-content/uploads/2025/01/1002TOTCUST_Paul-Pierson-2.pdf); AGA, *2022 Ranking of Companies By Total Sales Customers*, available at: <https://www.aga.org/wpcontent/uploads/2023/10/1002TOTCUST.pdf>; see also WalletHub, *Energy Costs by State* (2025) (July 1, 2024), available at: <https://wallethub.com/edu/energy-costs-by-state/4833>.

<sup>9</sup> The percentage of household energy bills was calculated based on California Energy Commission (CEC) 2019 California Residential Appliance Saturation Study average household energy consumption. See CEC, *2019 California Residential Appliance Saturation Study (RASS)* (July 2021), available at: <https://www.energy.ca.gov/sites/default/files/2021-08/CEC-200-2021-005-ES.pdf>. Statewide average residential electricity rates were calculated from the CEC Demand Forms at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=253591&DocumentContentId=88826>, and CEC provided spreadsheet on average residential natural gas rates.

advancement in data modeling and quantification, including enhanced probabilistic risk modeling, data-driven tranching, and scaling, as applicable, and as facilitated by data availability. In doing so, SoCalGas strives to transparently disclose data sources and calculations, and demonstrate the value of alternative methods, where authorized under the RDF. SoCalGas's intent is to evolve and continuously improve upon its risk management capabilities, in alignment with best practices and regulatory expectations.

With each iteration of its RAMP Report, SoCalGas demonstrates increasingly advanced risk-informed decision making supported by richer data and enhanced analytical capabilities. These advancements enable SoCalGas to develop deeper insights and implement more sophisticated risk mitigation strategies than ever before. The Data Availability and Quality Assessment Reports<sup>10</sup> submitted by SoCalGas on December 6, 2024, outlines its anticipated data collection plans to improve data availability and quality for application in the RDF. SoCalGas remains committed to refining its risk management decision-making to advance safer, more resilient, and cost-effective energy delivery to benefit customers, as well as the public.

SoCalGas also recognizes that the risk landscape is increasingly dynamic and evolving. This demands that risk assessments and mitigation strategies remain agile and adaptable. The RAMP Report presents SoCalGas's current risk assessment and mitigation strategies to address risk and the cost-effectiveness of those mitigation strategies. SoCalGas's risk analysis and mitigation planning will continue to evolve, and changes in scope or scale, including to the risk landscape, risk models, or financial forecasts will be presented in the GRC.

### **III. BACKGROUND AND PROCEDURAL HISTORY**

On November 14, 2013, the California Public Utilities Commission (Commission) opened Rulemaking (R.) 13-11-006, *Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the Rate Case Plan for Energy Utilities*. The purpose of that Rulemaking was to incorporate a risk-based decision-making framework into the Rate Case Plan (RCP) for the energy utilities' GRCs, in which utilities request funding for safety-related activities. Further, the State Legislature enacted California Public Utilities Code (Pub. Util. Code) Section 963, which states "[i]t is the policy of the state that the commission and each gas corporation place [the] safety of the public

---

<sup>10</sup> D.24-05-064 at 125 (Ordering Paragraph (OP) 4).

and gas corporation employees as the top priority.”<sup>11</sup> In 2014, the California Legislature added Section 750 to the Pub. Util. Code, which directs the Commission to “develop formal procedures to consider safety in a rate case application by an electrical corporation or gas corporation.”<sup>12</sup>

As a result of these directives, in D.14-12-025, the Commission adopted a risk-based decision-making framework into the Rate Case Plan for the energy utilities’ GRCs. Further, it established two new processes to address risk assessment procedures, the S-MAP proceeding and RAMP. These processes inform the subsequent GRC applications.

On May 1, 2015, as ordered in D.14-12-025, SoCalGas, SDG&E, PG&E, and Southern California Edison Company (SCE) filed S-MAP Applications (A.) 15-05-002, A.15-05-003, A.15-05-004, and A.15-05-005, which were consolidated on June 19, 2015, as A.15-05-002 and Related Matters. Phase One of that proceeding explored the models the utilities proposed in their applications to identify and manage risks.

On August 18, 2016, the Commission issued D.16-08-018 (the Phase 1 Interim S-MAP decision), which adjudicated the consolidated S-MAP applications, determined the format of future RAMP submissions, and directed the utilities to develop a more uniform approach to risk management in Phase 2 of that proceeding. On May 2, 2018, SoCalGas, SDG&E, PG&E, SCE, and other settling parties filed a Joint Motion for Approval of a Settlement Agreement in A.15-05-002 (cons.). The Commission adopted the S-MAP Settlement Agreement with modifications in D.18-12-014.

On November 4, 2021, the Commission issued D.21-11-09, which approves technical changes to the RDF, including RAMP analyses for all mitigations (including those formerly known as controls), requiring utilities to treat Public Safety Power Shutoffs (PSPS) as risk events within the RDF framework (not just as a mitigation), changing RAMP baselines to the start of the new GRC cycle, and adopting a revised S-MAP Lexicon.

On October 6, 2022, the Commission issued D.22-10-002, which approves additional changes to the RDF affecting RAMP, including the requirement that utilities must provide graphics of historical progress in their RAMP reports illustrating what safety work has been

---

<sup>11</sup> Pub. Util. Code § 963(b)(3).

<sup>12</sup> Pub. Util. Code § 750.

accomplished and what work remains to be done (including information over the two preceding RAMP cycles), and various cost mapping and reporting requirements.

On December 12, 2022, the Commission adopted D.22-12-027 (the Phase 2 Decision), which supersedes the Commission’s adoption of the S-MAP Settlement Agreement in D.18-12-014. The Phase 2 Decision adopts a Cost-Benefit Approach (CBA) that requires utilities to report on risk in monetized terms – dollars – for purposes of creating “utility risk and Mitigation Benefit calculations that are more useful during review and consideration of RAMP and GRC filings.”<sup>13</sup> The Phase 2 Decision also requires utilities to file an Environmental and Social Justice (ESJ) Pilot Study Plan (PSP) as part of their next RAMP filings. Accordingly, SoCalGas includes its ESJ PSP as Appendix 4 of the 2025 RAMP Report.

On May 30, 2024, the Commission adopted significant additional changes to the RDF RAMP requirements by adopting D.24-05-064 (the Phase 3 Decision). New provisions in the Phase 3 Decision include: a requirement that utilities present cost benefit ratios (CBRs) for each general rate case post-test year and continue to use and test Transparency Pilot Guidelines in conjunction with RAMP; adoption of a methodology for implementing tranches and a process for utilities to employ an alternative methodology; incorporation of a truncated power law distribution model for wildfire tail risk modeling and a process for using other modeling approaches; and numerous other technical requirements described more fully within this Report.

SoCalGas demonstrates compliance with the Commission’s RAMP requirements in Appendix 2 of the 2025 RAMP Report, and reinforces this compliance throughout.

#### **IV. CONSOLIDATION OF SOCALGAS’S AND SDG&E’S RAMP APPLICATION PROCEEDINGS**

As noted above, the Rate Case Plan Decision required the Companies to concurrently file their RAMP Applications and Reports by May 15, 2025.<sup>14</sup> SoCalGas and SDG&E share the same parent company, Sempra. Specific chapters in SoCalGas’s and SDG&E’s respective RAMP Reports set forth the same or similar facts and circumstances and are jointly sponsored. Consistent with past proceedings and Rule 7.4, SoCalGas and SDG&E anticipate the consolidation of their respective RAMP proceedings, as consolidation would promote efficiency

---

<sup>13</sup> D.22-12-027 at 26.

<sup>14</sup> D.20-01-002 at 55 (Table 4).

and avoid scheduling conflicts. Therefore, SoCalGas and SDG&E plan to expeditiously move to consolidate their RAMP proceedings under Rule 7.4 upon initiation of the proceedings, unless the Commission or assigned Administrative Law Judge(s) does so *sua sponte*.<sup>15</sup>

## **V. OVERVIEW OF SOCALGAS'S AND SDG&E'S RAMP REPORTS**

The instant RAMP proceeding is considered the first phase of each Company's next (TY 2028) GRC. "The purpose of the RAMP is to examine the utility's assessment of its key risks and its proposed programs for mitigating those risks."<sup>16</sup> The assessment is largely based on past conditions and events experienced by the Companies and/or their industries. SoCalGas's Report presents seven risk chapters (six of which are specific to SoCalGas), and SDG&E's Report presents eight risk chapters (seven of which are specific to SDG&E), and each Company's Report also contains one joint risk chapter (Cybersecurity).

While developing their respective reports, SoCalGas and SDG&E met with stakeholders and held a public workshop on December 17, 2024, to discuss their approach to the RAMP Reports. The workshop was intended to gather information from stakeholders and to provide stakeholders with an overview of certain aspects of the RAMP Reports. More specifically, the workshop focused on SoCalGas and SDG&E's risk selection and risk scoring, as well as on SoCalGas and SDG&E's alternative tranching methodology, which was also presented in a whitepaper served on November 1, 2024.<sup>17</sup>

From past lessons learned and the workshop, SoCalGas and SDG&E made a number of improvements since the 2021 RAMP filing, as explained in Volume 1, Chapter RAMP-1. In addition, and in response to stakeholder feedback, SoCalGas has included the Underground Storage Risk in its 2025 RAMP showing.<sup>18</sup> SoCalGas and SDG&E have also refined the

---

<sup>15</sup> See, e.g., A.21-05-011/014 (cons.), Email Ruling Consolidating [SoCalGas's and SDG&E's] RAMP Applications (June 8, 2021); I.19-11-010/011 (cons.), Administrative Law Judge's Ruling Consolidating Proceedings and Setting Prehearing Conference Schedule (November 21, 2019).

<sup>16</sup> D.14-12-025 at 31 (citation omitted).

<sup>17</sup> The White Paper was served consistent with the direction provided in D.24-05-064. SoCalGas and SDG&E's alternative tranching methodology is further discussed in Chapter RAMP-3: Risk Quantification Framework.

<sup>18</sup> Although it was not in the top 40% of SoCalGas's Enterprise Risk Registry (ERR) risks, the Underground Storage risk is of interest to stakeholders and is therefore being included in the final list.

alternative tranching methodology and endeavored to improve the transparency and clarity around the methodology in response to stakeholder feedback.

## VI. ROADMAP OF CHAPTERS WITHIN THE REPORT

The RAMP Report, appended to this Application, comprises two volumes and one appendix, beginning with the following volume of introductory chapters that lay the foundation of this filing and explain the methodologies used throughout:<sup>19</sup>

<b>SoCalGas Introductory Chapters (Volume 1)</b>
Chapter RAMP-1: Overview (SoCalGas/SDG&E)
Chapter RAMP-2: Enterprise Risk Management Framework (SoCalGas/SDG&E)
Chapter RAMP-3: Risk Quantification Framework (SoCalGas/SDG&E)
Chapter RAMP-4: Safety Culture (SoCalGas/SDG&E)
Chapter RAMP-5: Climate Change Adaptation (SoCalGas)

The Volume 1 Chapters are organized as follows:

- **Chapter RAMP-1 (joint)** provides an overview of the requirements for SoCalGas's and SDG&E's RAMP Reports, how the Companies have met the requirements, and changes and updates since the Companies' 2021 RAMP Reports. Chapter RAMP-1 also provides an overview of the organization of each Volume 1 Introductory Chapter and each Volume 2 Risk Chapter, and lessons learned by SoCalGas and SDG&E in developing the RAMP Reports and reviewing the RAMP filings of SCE and PG&E.
- **Chapter RAMP-2 (joint)** presents SoCalGas's and SDG&E's risk philosophy and objectives, their Enterprise Risk Management (ERM) Framework, explains the selection of RAMP risks, and discusses continuous improvement and changes to the Enterprise Risk Registry since 2022.

---

<sup>19</sup> Volume 1, Chapters RAMP-1, RAMP-2, RAMP-3, and RAMP-4 are jointly sponsored by SoCalGas and SDG&E; Chapter RAMP-5 is company-specific.

- **Chapter RAMP-3 (joint)** explains the quantitative methodology used for establishing SoCalGas's and SDG&E's Cost-Benefit Ratio (CBR) calculations and tranching methodology.
- **Chapter RAMP-4 (joint)** discusses SoCalGas's and SDG&E's safety culture, executive and board involvement in safety, and compensation policies to incentivize a strong commitment to safety.
- **Chapter RAMP-5** discusses SoCalGas's approach to managing risk associated with climate change.

SoCalGas's RAMP risk chapters are presented as identified below. Volume 1, Chapter RAMP-2: ERM Framework describes the process for selecting these risks for inclusion in the RAMP Report.

<b>SoCalGas RAMP Risk Chapters (Volume 2)</b>	
<b>Chapter</b>	<b>Subject</b>
SCG-Risk-1	Excavation Damage
SCG-Risk-2	High Pressure Gas System
SCG-Risk-3	Medium Pressure Gas System
SCG-Risk-4	Underground Gas Storage
SCG-Risk-5	Employee Safety
SCG-Risk-6	Contractor Safety
SCG-Risk-8/SDG&E-Risk-8	Cybersecurity

The following appendices are attached to the RAMP Report.

<b>Appendices</b>	
<b>Chapter</b>	<b>Subject</b>
RAMP-App-1	Glossary of Terms
RAMP-App-2	2025 RAMP Roadmap
RAMP-App-3	SoCalGas/SDG&E's Alternative Tranching White Paper
RAMP-App-4	ESJ Pilot Study 0 SDG&E
RAMP-App-5	Cost Benefit Ratio Ranking

## **VII. STATUTORY AND PROCEDURAL REQUIREMENTS**

SoCalGas files this Application according to D.18-12-014, D.20-01-002, D.21-11-009, D.22-10-002, D.22-12-027, and D.24-05-064, Section 701 of the Public Utilities Code, and Article 2 of the Commission's Rules of Practice and Procedure.

### **A. Rule 2.1(A) - Legal Name**

Southern California Gas Company is a public utility corporation organized and existing under the laws of the State of California. SoCalGas's principal place of business and mailing address is 555 West Fifth Street, Los Angeles, CA 90013.

### **B. Rule 2.1(b) - Correspondence**

Correspondence or communications, including any data requests, regarding this Application should be addressed to:

Kathleen H. Cordova  
GRC Program Manager  
SOUTHERN CALIFORNIA GAS COMPANY  
555 West Fifth Street, Suite 1700  
Los Angeles, CA 90013  
Telephone: (213) 244-2446  
Fax: (858) 654-1789  
Email: [Kcordova@semprautilities.com](mailto:Kcordova@semprautilities.com)

with copies to:

Holly A. Jones  
Senior Counsel, Legal Regulatory  
SOUTHERN CALIFORNIA GAS COMPANY  
555 West Fifth Street, Suite 1400  
Los Angeles, CA 90013  
Telephone: (213) 244-2232  
Fax: (213) 629-9620  
Email: [hajones@socalgas.com](mailto:hajones@socalgas.com)

Data requests should be submitted via the SoCalGas and SDG&E Discovery Portal. Access to the Discovery Portal may be requested by submitting via email the following requestor information to [SempraDiscovery@semprautilities.com](mailto:SempraDiscovery@semprautilities.com):

- the proceeding name;
- the organization's name;

- the primary contact details (first/last name, email, phone, job title); and
- other participant's details (first/last name, email, phone, job title) who will submit, receive or view data requests/responses and or view attachments in Discovery Portal.

Requestors should also specify whether access is needed to workpapers, data requests, or both.

### **C. Rule 2.1(c)**

#### **1. Proposed Category of Proceeding**

In accordance with Rule 7.1, SoCalGas requests that this Application be categorized as ratesetting pursuant to Commission Rule of Practice and Procedure 1.3(e) and 7.1(e)(2).

#### **2. Need for Hearings**

SoCalGas does not believe that evidentiary hearings on SoCalGas's RAMP are necessary and notes that evidentiary hearings are not contemplated by the Commission's proceeding schedule in D.20-01-002.

#### **3. Issues to be Considered and Relevant Safety Considerations**

The principal issues to be considered are whether:

- The Commission should adopt the Companies' proposed schedule for the Safety Policy Division (SPD) to evaluate and issue a report on SoCalGas's RAMP Report and for parties to file comments, consistent with the Rate Case Plan Decision's revised filing schedule<sup>20</sup>; and
- The Commission should expeditiously close this proceeding upon such time as the SPD submits its report and parties have submitted all scheduled comments, in late December 2025, to permit SoCalGas and SDG&E the opportunity to consider SPD's evaluation and other parties' comments prior to the filing of the Companies' TY 2028 GRC applications in May 2026, consistent with D.20-01-002.<sup>21</sup>

---

<sup>20</sup> D.20-01-002 at 49 (Table 3: Adopted Revised GRC Application Filing Schedule).

<sup>21</sup> D.20-01-002 at 48 (stating the Commission's intent to "create additional time for [the Safety and Enforcement Division] and parties to complete their review of the utility's RAMP farther in advance of the subsequent GRC filing date, so that the utility has as much time as possible to meaningfully incorporate the results of this review in its GRC application.").

With respect to safety considerations, SoCalGas's RAMP Report focuses on safety and effective risk mitigation. It includes SoCalGas's top enterprise safety risks and SoCalGas's plans to mitigate those risks.

#### **4. Proposed Schedule**

In accordance with the scheduling requirements set forth in D.20-01-002, SoCalGas proposes the following schedule be adopted for this proceeding. SDG&E is also proposing the same schedule in its concurrently filed RAMP application, in anticipation of a consolidated proceeding.

<b>Proposed Procedural Schedule</b>	
<b>Event</b>	<b>Proposed Date</b>
Application Filed	5/15/2025
Workshop on the Companies' Applications	6/20/2025
Protests or Responses	Approx. 6/16/2025
Reply to Protests or Responses	Approx. 6/28/2025
Prehearing Conference	July 2025
Assigned Commissioner Scoping Memo and Ruling	7/30/2025
SPD Staff Report	9/1/2025
Opening Comments on Companies' Applications and SPD Report	11/15/2025
Reply Comments	12/1/2025
Companies file their respective Test Year 2028 GRC Applications	5/15/2026

#### **D. Rule 2.2 - Articles of Incorporation**

A copy of SoCalGas's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on October 1, 1998, in connection with SoCalGas's Application 98-10-012, and are incorporated herein by reference.

## **VIII. SERVICE**

A copy of this Application and a link to SoCalGas's 2025 RAMP Report<sup>22</sup> has been served via email on the following service lists:

1. R. 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities;
2. R.18-04-019 Order Instituting Rulemaking to Consider Strategies and Guidance for Climate Change Adaptation;
3. A.22-05-015 and A.22-05-016 (consolidated), SoCalGas's and SDG&E's 2024 General Rate Case Applications; and
4. A.21-05-011 and A. 21-05-014 (consolidated) SoCalGas's and SDG&E's 2021 RAMP Applications.

Supporting workpapers have also been made available via the SoCalGas and SDG&E Discovery Portal.

## **IX. RELIEF SOUGHT**

SoCalGas respectfully requests:

- Adoption of the Companies' proposed schedule to review SoCalGas's and SDG&E's RAMP Reports, issuance of a staff report, and for interested parties to file comments, consistent with the requirements of D.14-12-025 and D.20-01-002; and
- The Commission expeditiously close this proceeding upon such time as the SPD submits its report and parties have submitted all scheduled comments, in late December 2025, to permit SoCalGas and SDG&E the opportunity to consider SPD's report and other parties' comments prior to the Companies' filing of their upcoming TY 2028 GRC applications, in May 2026, consistent with D.20-01-002.

---

<sup>22</sup> Due to its large size, a link to the as-filed version of SoCalGas's 2025 RAMP Report has been served via email, pursuant to Rule 1.10(c).

**X. CONCLUSION**

SoCalGas respectfully requests that the Commission provide the relief sought in Section IX above.

Respectfully submitted,

/s/ Holly A. Jones

Holly A. Jones  
Southern California Gas Company  
555 West Fifth Street, Suite 1400  
Los Angeles, CA 90013  
Telephone: (213) 244-2232  
Fax: (213) 629-9620  
Email: hajones@socalgas.com

May 15, 2025

*Counsel for Southern California Gas Company*

**OFFICER VERIFICATION**

I, Deana M. Ng, declare the following:

I am an officer of Southern California Gas Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904-G) TO SUBMIT ITS 2025 RISK ASSESSMENT AND MITIGATION PHASE REPORT** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 15, 2025, at Los Angeles, California.

By: /s/ Deana M. Ng  
Deana M. Ng