APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2027 COST ALLOCATION PROCEEDING (A.25-09-014)
DATA REQUEST SET 5 FROM CAL ADVOCATES – PUBADV-SCG_SDGE-005-ST
DATED: DECEMBER 8, 2025
SOCALGAS RESPONSE DATED: DECEMBER 22, 2025

Question 1.

1. Referring to pp. EM-5 and EM-6:

   a) Please provide formal documentation of the "forecast received from Long Beach" for its gas demand in this CAP proceeding. Please include the workpapers, research, documentation, and any such information from the City of Long Beach that was used to produce its forecasts. If the City of Long Beach did not provide SoCalGas with this information supporting its expected forecast, please thoroughly explain why.

   b) Please provide formal documentation of the forecasted gas demand that "has been prepared and provided by SWG for its southern California markets" for this CAP proceeding. Please include the workpapers, research, documentation, and any such information from Southwest Gas (SWG) that was used to produce their forecasts. If SWG did not provide SoCalGas with this information supporting their expected forecast, please thoroughly explain why.

   c) Please provide formal documentation of the "forecast prepared and provided by ECOGAS of Mexicali" for this CAP proceeding. Please include the workpapers, research, documentation, and any such information from ECOGAS that was used to produce their forecasts. If ECOGAS did not provide SoCalGas with this information supporting its expected forecast, please thoroughly explain why.

   d) Please provide formal documentation of SoCalGas' in-house computation of the forecasted delivery expected to the City of Vernon during this CAP proceeding. Please include the workpapers, research, documentation, and any such information that SoCalGas used to determine what the City of Vernon's demand would be, including "recorded 2024 usage for commercial and industrial customers already served by the City of Vernon, plus those additional customers who are expected to request retail service from City of Vernon." If SoCalGas cannot provide this information supporting their expected forecast, please thoroughly explain why.

   e) Why did the City of Vernon not provide its own forecasts like ECOGAS, the City of Long Beach, and SDG&E?

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Response 1.a) – 1.e).

a) City of Long Beach Utilities opted to provide the forecast it submitted for the 2024 California Gas Report (CGR).
Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66, and D.21-09-020 - See CONFIDENTIAL - PubAdv-SCG_SDGE-005-ST-01a.pdf

b) Southwest Gas Corporation (SWG) opted to provide the forecast it submitted for the 2024 CGR.
Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66, and D.21-09-020 - See PubAdv-SCG_SDGE-005-ST-01b.pdf

c) Ecogas opted to provide the forecast it submitted for the 2024 CGR.
Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66, and D.21-09-020 - See CONFIDENTIAL - PubAdv-SCG_SDGE-005-ST-01c.pdf

d) The City of Vernon forecast combines recorded actuals and forecasted data provided by Vernon, along with migrated volumes from SoCalGas to Vernon calculated by SoCalGas. The portion supplied by Vernon reflects the forecast figures published in the 2024 CGR. The only adjustment is SoCalGas's updated migrated volumes, which modify the totals accordingly.
Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66, and D.21-09-020 - See CONFIDENTIAL - PubAdv-SCG_SDGE-005-ST-01d.pdf and CONFIDENTIAL - PubAdv-SCG_SDGE-005-ST-01d.xlsx.

e) See response to question 1d above.

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Question 2.

2. Referring to Table EM-7 on p. EM-16:
   a) Specifically, regarding the forecasted peak day demands for the City of Vernon and ECOGAS Mexicali, what factors are contributing to the peak day demand being so low? For example, the City of Vernon has a peak day demand of 22 MDth, which, if applied to 365.25 days in one year, would result in 8035.5 MDth. This does not cover the City of Vernon's expected load (provided through wholesale from SoCalGas) for any of the years 2027 to 2029 despite being a "peak day" of demand. The same calculation for ECOS Mexicali results in the same result for each year of the CAP: a peak day, applied every day of the year, still does not cover the entirety of ECOS' expected annual demand. Please explain why.
   b) On p. EM-11, SoCalGas states "for HDD-sensitive core market segments, peak day demand is calculated using the applicable 1-in-35-year peak day temperature condition for SoCalGas or SDG&E. SoCalGas and SDG&E noncore commercial peak day demand is calculated under a 1-in-10-year peak day temperature condition." Why are different peak day calculations (1-35 versus 1-10) used for different customer class segments and then applied together to develop totals in this table? Has SoCalGas done in the past? Please provide or cite testimony showing that this has been done to calculate peak day totals in the past, along with the commission granting this request from previous CAP proceeding(s).
   c) On p. EM-11, SoCalGas states "noncore industrial and refinery peak day demand is estimated using the ratio of 2024 historical December peak day demand over average December daily demand." Has SoCalGas done this in the past? If not, explain why.
   d) As a follow up to part c), peak day demand for industrial and refinery segments can often occur due to operational ramp-ups, maintenance schedules, weather-related process heating, market-driven production spikes, etc. Refineries often increase throughput in late summer to meet fall fuel demand (say, for example, gasoline blending for winter specs). Industrial facilities may ramp up production after summer maintenance shutdowns. Why then would peak load not occur in a month say August – September? Please thoroughly justify SoCalGas' use of the ratio approach, which involves the December month only.
   e) On p. EM-12, SoCalGas states "for all other market segments, peak day load is calculated as average daily December month's demand." Has SoCalGas done this in the past? If not, please explain why. Why is December being used here instead of January? Typically, core/residential demand peaks in January, as cited in reports such as the 2022 Integrated Energy Policy Report (IEPR), the CEC's 2020 Natural Gas Market Assessment, the EIA's Natural Gas Consumption by End Use for California, and SoCalGas' own General Rate Case (A.19-11-009)? What attributes of the "other market segments" imply a peak in December?
   f) As a follow up to part e), to which market segments exactly does "all other market segments" refer?

Response 2.a) – 2.f)

a) The peak day is designed for the total system demand instead of each specific market segment. SoCalGas used gas demand for the month of December as the peak month for all markets since December has the largest 20-year-average monthly Heating Degree Days for the entire SoCalGas system (see Page 3 in the Workpaper of Chapter 2 for Weather Design Forecast).

b) The gas demand of noncore commercial market segment is less HDD-sensitive than the demand of core markets. Thus, SoCalGas uses a less extreme but more frequent 1-in-10-year likelihood peak day temperature for noncore commercial market segment. The same method has been used in previous adopted CAP proceedings, including 2024 CAP (Chapter 5), 2020 CAP (Chapter 5), 2016 CAP Phase 2(testimony of Bruce Wetzel), and 2013 CAP (testimony of Bruce Wetzel).

c) This method was used in the previous 2024 CAP (testimony of Chapter 5) only for noncore industrial segment. The refinery and noncore industrial peak day demand was calculated the same way (using December daily average) in previous CAP proceedings, including 2020 CAP (testimony of Chapter 5), 2016 CAP Phase 2 (testimony of Bruce Wetzel), and 2013 CAP (testimony of Bruce Wetzel).

d) Refer to the response for question 2a above.

e) Yes. See response to question 2a above. SoCalGas does not have a GRC application numbered A.19-11-009.

f) SoCalGas “all other market segments” include core Gas AC, Gas Engine, NGV, noncore Enhanced Oil Recovery (EOR), and Wholesale and International (City of Long Beach, SDG&E, Southwest Gas, City of Vernon, and ECOGAS) segments.

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Question 3.

3. Referring to pp. EM-16 and EM-17:

   a) On p. EM-17, SoCalGas notes that for the SDG&E Consolidated Peak Day Demand (Table EM-13), "for all the other market segments, peak day load is calculated as the average daily December month's demand." Has SoCalGas done this for calculations for peak day related to SDG&E in the past? If not, please explain why. Why is December being used here instead of January? Please thoroughly explain.

   b) As a follow up to part a), to which market segments exactly does "all the other market segments" refer? For each market segment, please justify why average December month's daily demand is a good proxy for peak day demand.

   c) On p. EM-17, SoCalGas notes that for the SDG&E Consolidated Peak Month Demand (Table EM-14), "for HDD-sensitive core market segments, December HDD for SDG&E's cold year temperature design is used to calculate gas demand." Please thoroughly justify why this is a good proxy for peak month demand forecasting for HDD-sensitive core market segments and include any documents, reports or worksheets to supplement the response.

   d) As a follow-up to part c), what about for non-HDD sensitive core market segments and non-core segments? Please explain what was used for each separate segment and justify why. Be sure to include any documents, reports or worksheets to supplement the response. If no such documents/reports/worksheets exist, please justify why not.

Response 3.a) – 3.d).

a) The peak day is designed for the total system demand instead of each specific market segment. SDG&E used gas demand for the month of December as the peak month for all markets since December has the largest 20-year-average monthly Heating Degree Days for the entire SDG&E system (see Page 27 in the Workpaper of Chapter 2 for Weather Design Forecast). . It has been used in the previous adopted CAP proceedings, including 2024 CAP (testimony of Chapter 5), 2020 CAP (testimony of Chapter 5), 2016 CAP Phase 2(testimony of Bruce Wetzel), and 2013 CAP (testimony of Bruce Wetzel).

b) SDG&E "all other market segments" include NGV and noncore industrial segments. Peak day demand of these other market segments is part of the total system peak demand. December is used in the calculation of peak day demand for these segments for the same reason as explained in the response to question 3a. Since these market segments are not HDD-sensitive, the daily average of the peak month demand is used to estimate the peak day demand of these market segments

c) In the table of consolidated peak month demand, for HDD-sensitive core market segments, December is used as the peak month to calculate the demand because December has the largest 20-year-average monthly Heating Degree Days for SDG&E (see Page 27 in the Workpaper of Chapter 2 for Weather Design Forecast). The cold year temperature design uses the criterion of 1-in-35-year chance of occurrence to calculate the peak month demand for HDD-sensitive market segments. This method has been used in previous CAP proceedings, including 2024 CAP (Chapter 5), 2020 CAP (Chapter 5), 2016 CAP Phase 2 (testimony of Bruce Wetzel), and 2013 CAP (testimony of Bruce Wetzel). For supplementary documents, please refer to the testimony and workpaper for Chapter 2 Weather Design Forecast.

d) The less-extreme average year (1-in-10) December forecast is used to estimate peak month demand for non-HDD sensitive market segments. The justification for using December as a proxy is based on that month having the largest 20-year average monthly HDDs for SDG&E as documented in the Chapter 2 workpaper. This method has been used in previous CAP proceedings cited in the response to question 3c.For supplementary documents, please refer to the workpaper for Chapter 2 Weather Design Forecast.

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Question 4.

4. Referring to Tables EM-5, EM-6, EM-11 and EM-12:
   a) SoCalGas' wholesale gas deliveries to SDG&E are expected to be 83,378, 84,878, and 85,274 MDth per year (Table EM-5) under average temperatures for 2027-2029, respectively. SDG&E's gas demand forecast is 82,535, 84,021 and 84,412 for 2027-2029 (Table EM-11), respectively. Please explain where SDG&E expects to acquire the additional gas needed to meet demand for the average temperature year scenario by reconciling this difference. Will this gas be met by an entity other than SoCalGas? Please include any worksheets or calculations reconciling where the missing gas demand is being filled from for the average temperature year scenario.
   b) The same discrepancy occurs for the 1-35 cold year scenario (Tables EM-6 and EM-12). Please explain where SDG&E expects to acquire the additional gas needed to meet the 1-35 cold year gas demand scenario by reconciling this difference. Will this gas be met by an entity other than SoCalGas? Please include any worksheets or calculations reconciling where the missing gas demand is being met for the 1-35 cold year temperature scenario.

Response 4.a) & 4.b).

a) SoCalGas's average year wholesale demand (or throughput) for SDG&E as indicated in Table EM-5 is larger than SDG&E's average year demand as indicated in Table EM-11, which does not include SDG&E's estimated unaccounted for (UAF) gas. See the SDG&E Consolidated Gas Demand Forecast Summary table (in Mtherms) in Chapter 5 Workpaper page 52 for details.
b) SoCalGas's 1-in-35 cold temperature year wholesale demand to SDG&E as indicated in Table EM-6 is larger than SDG&E's 1-in-35 cold temperature year demand as indicated in Table EM-12, which does not include SDG&E's estimated unaccounted for (UAF) gas. See the SDG&E Consolidated Gas Demand Forecast Summary table (in Mtherms) in Chapter 5 Workpaper page 52 for details.