

**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 6 FROM CAL ADVOCATES – PUBADV-SCG_SDGE-006-MS
DATED: DECEMBER 10, 2025
SOCALGAS RESPONSE DATED: JANUARY 8, 2026

Question 1.

1. Please explain how the expansion of core electric generation eligibility to 10 MW and the elimination of the therm usage threshold will affect the gas procurement costs and reliability for existing residential and small commercial core customers due to the potential influx of new, larger EG load?

Response 1:

SoCalGas objects on the ground the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further notes that this information is not addressed in Witness Duran's testimony. SoCalGas further objects to the extent this request seeks analysis not conducted by the Company. Subject to and without waiving the foregoing, SoCalGas provides the following response:

The expansion of core electric generation (EG) eligibility provides customers the option to elect core service; it does not automatically transition them from noncore to core classes. Therefore, we do not have immediate impacts to share regarding gas procurement. Fundamentally, when a customer moves from noncore to core service, they typically become a bundled service customer, meaning SoCalGas procures their gas supply. This switch requires a five-year commitment to remain on core service, which helps ensure demand stability and reduces operational risk from frequent rate changes¹.

From a reliability perspective, this change allows eligible customers to be placed in a higher priority during curtailment events. Specifically, they would fall under Priority 2A alongside other core customers that qualify for this level of service.² This provides greater reliability compared to their current curtailment order as non-dispatchable EG load, ensuring improved service continuity during constrained conditions.

¹ Special Condition 4, SoCalGas Schedule No. G-CP

² B. Priority of Service, SoCalGas Rule No. 23

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Question 2.

2. Please provide the analysis or data supporting why 10 MW, rather than an intermediate size (e.g., 3 MW or 5 MW), is the appropriate new threshold that aligns with the intent of small-scale generation for reliability purposes.

Response 2.

The testimony does not include data or pinpoint analysis supporting the 10 MW threshold, rather, it references publicly available examples of EG equipment sizes across industries, which vary widely. These examples illustrate that 10 MW captures meaningful small-scale generation without extending eligibility to large, dispatchable units that could materially impact procurement and curtailment processes.

The 10 MW threshold was selected based on practical considerations and industry norms rather than a specific quantitative analysis. Dispatchable EG units typically exceed 20 MW, while customers below this size are generally non-dispatchable and seek onsite generation for reliability purposes.³ Setting the threshold at 10 MW, rather than 20 MW, limits eligibility to primarily distribution-level customers, aligning with the majority of customers on our system who pursue onsite EG for resiliency. This approach avoids introducing significant operational complexity or procurement risk while still expanding eligibility to meaningful small-scale generations.

³ California Gas Report 2024, at 115

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Question 3.

3. Please explain the estimated impact of eliminating the monthly usage limitation of 20,800 therms per active month on the overall core gas portfolio, specifically in terms of peak-day demand and annual consumption for the 2027–2029 CAP period.

Response 3.

SoCalGas objects on the ground the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further notes that this information is not addressed in Witness Duran's testimony. SoCalGas further objects to the extent this request seeks analysis not conducted by the Company. Subject to and without waiving the foregoing, SoCalGas provides the following response:

As stated in Response 1, SoCalGas does not have immediate or estimated impacts related to the proposal because customers are not automatically transitioned to core service; they must affirmatively elect that change. Once historical data becomes available, SoCalGas will have a basis to evaluate and incorporate any potential updates to forecasted volumes.

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Question 4.

4. Given that noncore service typically offers lower transportation rates (see Figure BD-2), what financial advantages of core service (e.g., specific cost savings or bundled benefits) are expected to outweigh the lower rates of noncore service for newly eligible 1–10 MW customers?

Response 4.

Please refer to Witness Duran's testimony at page BD-12, sentences 9 through 14 and BD-13, sentences 3 through 7.

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Question 5.

5. Given that core service provides higher priority during curtailment events, how will the influx of larger EG customers (up to 10 MW) into the core class affect system reliability and curtailment risk exposure for existing core customers (residential and small commercial users)?

Response 5.

Please refer to Responses 1 and 3. SoCalGas does not have immediate or estimated impacts related to the proposal because customers are not automatically transitioned to core service; eligible customers would need to elect that change, which is based on customer preference despite core rates generally being higher than noncore rates (see BD-12 and Figure BD-2 of testimony).

As addressed in Witness Duran's testimony at pages BD-1–2, Rule 23 of SoCalGas's tariffs provide the utility broad discretion to manage curtailments in a manner that maintains system integrity and prioritizes service to core customers during curtailment events.

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Question 6.

6. Please explain how SCG plans to manage the increased complexity and potential demand peaks in core service resulting from intermittent generators (such as those integrated with renewables or microgrids) that may utilize the expanded core service.

Response 6.

SoCalGas objects on the ground the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further notes that this information is not addressed in Witness Duran's testimony. SoCalGas further objects to the extent this request seeks analysis not conducted by the Company. Subject to and without waiving the foregoing, SoCalGas provides the following response:

Please refer to Responses 1, 3, and 5. SoCalGas does not have immediate or estimated impacts related to the proposal because customers are not automatically transitioned to core service; eligible customers would need to elect that change, which is based on customer preference. Once historical data becomes available, SoCalGas will have a basis to evaluate and incorporate any potential updates to forecasted volumes.

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Question 7.

7. Please provide all available data regarding the historical growth of the GO-CEG program (see Figure BD-1), and explain how the projected customer migration or adoption rate under the new 10 MW limit factors into overall demand forecasts for the 2027–2029 CAP period.

Response 7.

See file, Cal Advocates 006_q7.xlsx.



As mentioned in responses, 1,3, 5, and 6, SoCalGas does not have immediate or estimated impacts related to the proposal because customers are not automatically transitioned to core service; eligible customers would need to elect that change, which is based on customer preference. Once historical data becomes available, SoCalGas will have a basis to evaluate and incorporate any potential updates to forecasted volumes.

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Question 8.

8. The testimony states that noncore service typically offers lower transportation rates than core service (GO-CEG). For newly eligible 1–10 MW customers, what precise financial incentives or cost analyses will drive their decision to opt for the higher-priced core service over noncore service?

Response 8.

Please see Response 4.

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Question 9.

9. Please explain how the proposed modification to Rule 23, which expands core eligibility, is expected to facilitate compliance with state goals outlined in the CARB Scoping Plan and the Integrated Resource Planning (IRP) framework for decarbonization and procurement of new clean capacity.

Response 9.

As mentioned in Witness Duran's testimony,⁴ certain Commission-approved programs are reserved exclusively for core customers. In relation to the CARB Scoping Plan and the IRP framework for decarbonization, the recently approved Voluntary Renewable Natural Gas Tariff (VRNGT) is available only to core nonresidential customers under the pilot program. Expanding core eligibility under Rule 23 allows additional nonresidential customers the option to elect RNG as their commodity, supporting emissions reductions and directly aligning with the CARB Scoping Plan, SB 1383, and SB 1440.

⁴ Pages 12-13, Chapter 11 (Duran)

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Question 10.

10. SCG and SDG&E argue that current limits may lead to increased reliance on diesel generators during PSPS events. What is the estimated reduction in diesel generator usage and associated emissions anticipated from expanding core EG eligibility?

Response 10

SoCalGas objects to the extent the question misstates testimony. Subject to and without waiving the foregoing, SoCalGas provides the following response: SoCalGas notes that no such argument was made in Witness Duran's testimony. Rather, his testimony states that PSPS events have led to an increased reliance on diesel generators, and expanding core EG eligibility would encourage cleaner alternatives such as renewable natural gas. SoCalGas did not conduct analysis on the reduction in diesel generator usage and associate emissions from expanding core EG eligibility, however the South Coast Air Quality Management District states that diesel generators produce significantly greater amounts of fine particulates and emissions compared to natural gas, and engines operating on natural gas are much cleaner for the same amount of energy produced.⁵

⁵ <https://www.aqmd.gov/home/permits/emergency-generators#Fact2>

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Question 11.

11. The original 1 MW core eligibility threshold was linked to the Self-Generation Incentive Program (SGIP). Why did SoCalGas wait until this proceeding to propose a change reflecting SGIP's subsequent revisions (which increased eligibility to 3 MW and removed the 5 MW total system size limitation)?

Response 11.

As explained in Witness Duran's testimony (see Sections II–IV), the proposal is driven by current market evolution, increased customer demand for resiliency, and advancement in technologies.

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Question 12

12. Since specific Commission-approved programs, such as the Voluntary Renewable Natural Gas (RNG) pilot tariff, are reserved exclusively for core customers, what is the estimated demand or projected enrollment increase in the RNG pilot tariff resulting from expanded eligibility criteria?

Response 12.

SoCalGas objects on the ground the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further notes that this information is not addressed in Witness Duran's testimony. SoCalGas further objects to the extent this request seeks analysis not conducted by the Company. Subject to and without waiving the foregoing, SoCalGas provides the following response:

As mentioned in Responses, 1,3, 5, and 6, SoCalGas does not have immediate or estimated impacts related to the proposal because customers are not automatically transitioned to core service; eligible customers would need to elect that change, which is based on customer preference.

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Question 13.

13. Please explain the significant operational burdens associated with noncore service (e.g., working with third-party marketers and managing commodity price volatility) that core service (GO-CEG) is designed to alleviate for these customers.

Response 13.

Please refer to SoCalGas tariff schedules⁶ for specifics regarding requirements and conditions of noncore service, as well as Witness Duran's testimony at BD-12, sentences 9 through 14.

Broadly, noncore customers must secure a third-party marketer to procure gas, which involves contracts and added costs. They also face commodity price volatility tied to market hubs and backbone transportation constraints, along with balancing obligations under Schedule IMB. Additional requirements may include separate metering or measurement equipment as outlined in the applicable tariff. Noncore electric generation customers are among the first in curtailment order. In contrast, core service provides a fixed monthly procurement structure, benefits from SoCalGas's storage reliability, and shifts balancing responsibilities to SoCalGas.

⁶ [Schedule GT-NC, Intrastate Transportation Service](#) and [Schedule GT-TLS, Intrastate Transmission Level Service](#)

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Question 14.

14. Please explain how the Optional Core Electric Generation Service (GO-CEG) tariff has grown in terms of customer accounts and annual consumption since its implementation in 2020 (see Figure BD-1). What is the projected rate of growth under the newly proposed eligibility criteria?

Response 14.

Please see Response 7.

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Question 15.

15. What specific operational characteristics distinguish the customers cited as examples (UCLA, Saddleback College, Hoag Hospital), whose systems exceed 1 MW and 20,800 therms, from large dispatchable EG customers on SCG's transmission system who generate electricity for wholesale grid export?

Response 15.

The referenced entities use onsite generation to meet their own operational energy needs, such as electricity, heating, and cooling, prioritizing reliability and efficiency for their facilities rather than market participation. In contrast, as noted in Response 2, dispatchable electric generators typically exceed 20 MW and are served from the transmission-level system, operating for grid export and market-driven dispatch rather than onsite needs.

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Question 16.

16. If the goal is to accommodate critical facilities primarily driven by reliability needs rather than market participation, please explain why expanded eligibility is restricted to 10 MW, given that technologies such as Mainspring Energy's linear generators are designed to scale to over 100 MW capacities. Please provide the analysis or data supporting why 10 MW, rather than an intermediate size (e.g., 3 MW or 5 MW), is the appropriate new threshold that aligns with the intent of small-scale generation for reliability purposes?

Response 16.

Please see Response 2.

The proposed 10 MW threshold is intended to accommodate modern reliability-focused, on-site generation without extending core service to utility-scale or market-driven facilities. Systems exceeding 20 MW are generally associated with dispatchable electric generation for wholesale markets, which remain outside the scope of this modification.

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Question 17.

17. Please clarify whether the expansion to 10 MW eligibility is intended to be a permanent change or a temporary measure subject to review in future CAP proceedings.

Response 17.

The expansion to 10 MW eligibility is intended as a permanent modification, subject to review and evaluation.

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Question 18.

18. Please provide any risk assessments or scenario analyses conducted to evaluate potential unintended consequences of expanding eligibility, such as disproportionate impacts on smaller core customers.

Response 18.

Please see Response 5.

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Question 19.

19. Please explain how SCG and SDG&E plan to monitor and report the effects of expanded eligibility on system reliability, procurement costs, and emissions reductions over the CAP period.

Response 19.

SoCalGas objects on the ground the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further notes that this information is not addressed in Witness Duran's testimony. SoCalGas further objects to the extent this request seeks analysis not conducted by the Company. Subject to and without waiving the foregoing, SoCalGas provides the following response:

Once historical data becomes available, SoCalGas will have a basis to evaluate and incorporate any potential updates to forecasted volumes, which would be addressed in subsequent CAP proceedings.

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Question 20.

20. If SCG and SDG&E cannot provide the requested information to answer the questions above, state the reason in the response.

Response 20.

Not applicable.