

**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 1 FROM WESTERN MANUFACTURED HOUSING  
COMMUNITIES ASSOCIATION (WMA) DATED: DECEMBER 11, 2025  
SOCALGAS RESPONSE DATED: JANUARY 8, 2026**

**Question 1.**

1. Please provide all electronic workpapers to support Application 25-09-014 and all testimony therein.

**Response 1.**

Please refer to the following list of executable versions of SoCalGas and SDG&E's workpapers in native format sent via SoCalGas electronic data transfer (EDT):

- Ch 1 Dandridge\_Storage Workpapers 2027 CAP
- Ch 2 Martinez\_Scg Weather Design CAP 2027
- Ch 2 Martinez\_Scg Weather Design\_Peak\_Day\_Design CAP 2027
- Ch 2 Martinez\_Sdge Weather Design CAP 2027
- Ch 2 Martinez\_Sdge Weather Design\_Peak\_Day\_Design CAP 2027
- Ch3 Martinez\_Meters\_Res\_Core\_NGV\_Gas\_Price\_Core\_Brokerage\_Fee Workpers 2027 CAP
  - a. Note the following Chapter 3 testimony table title clarifications:
  - b. Table EM-15, line 15 on page EM-16, should be titled Table EM-16
  - c. Table EM-16, line 17 on page EM-17, should be titled Table EM-18
  - d. Table EM-17, line 1 on page EM-18, should be titled Table EM-19
  - e. Table EM-18, line 7 on page EM-18, should be titled Table EM-20
  - f. Table EM-13, line 13 on page EM-19, should be titled Table EM-21
- Ch 4 Fiola EG Forecast Workpapers 2027 CAP
- Ch 5 Martinez\_Scg\_MDM\_Core\_2027 CAP
- Ch 5 Martinez\_Scg\_MDM\_Summary\_2027 CAP
- Ch 5 Martinez\_Scg\_noncore\_Ind\_2027 CAP
- Ch 5 Martinez\_Scg\_Refinery\_2027 CAP
- Ch 5 Martinez\_ScgSmCoGen\_2027 CAP
- Ch 5 Martinez\_Sdge\_MDM\_Summary\_2027 CAP
- Ch 5 Martinez\_Sdge\_noncore\_forecast\_2027 CAP
- Ch 5 Martinez\_Sdge\_noncore\_Com\_Summary\_2027 CAP
- Ch 8 Seres\_Schmidt-Pines\_Cost Allocation\_2027 CAP

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- Ch 8 Seres\_Schmidt-Pines\_SCG Embedded Cost Model\_2027 CAP
- Ch 8 Seres\_Schmidt-Pines\_SDGE Embedded Cost Model\_2027 CAP
- Ch 9 Schmidt-Pines\_SDGE Cost Allocation tables\_2027 CAP
- Ch 9 Schmidt-Pines\_SDGE LRMC Customer Costs\_2027 CAP
- Ch 9 Schmidt-Pines\_SDGE LRMC Distribution Costs\_2027 CAP
- Ch 9 Schmidt-Pines\_SDGE LRMC OM Loaders\_2027 CAP
- Ch 9 Schmidt-Pines\_SDGE Misc Data\_2027 CAP
- Ch 9 Schmidt-Pines\_SCG LRMC Customer Costs\_2027 CAP
- Ch 9 Schmidt-Pines\_SCG LRMC Distribution Costs\_2027 CAP
- Ch 9 Schmidt-Pines\_SCG LRMC OM loader\_2027 CAP
- Ch 9 Schmidt-Pines\_SCG Cost Allocation tables\_2027 CAP
- Ch 10 Borkovich\_BTS\_Min. Design Standard Capacity Final & Graph\_2027 CAP
- Ch 10 Borkovich\_BTS\_Net System Capacity 2022-2024\_2027 CAP
- Errata-12\_29-\_2025-Ch 12 Foster\_SCG Fixed Cost Analysis\_2027 CAP
- Ch 12 Foster\_SCG NGV Compression Rate Adder\_2027 CAP
- Errata-12\_29-\_2025-Ch 12 Foster\_SCG Rate Design Model\_2027 CAP
- Ch 12 Foster\_SCG Submeter Credit\_2027 CAP
- Ch 12 Foster\_SDGE NGV Compression Rate Adder\_2027 CAP
- Errata-12\_29-\_2025-Ch 12 Foster\_SDGE Rate Design Model\_2027 CAP
- Ch 12 Foster\_SDGE Submeter Credit\_2027 CAP

SoCalGas's and SDG&E's support to the workpapers in native format include the following:

- Sup\_Ch 3 Martinez SCG Meter Forecast WP-2027 CAP
- Sup\_Ch 3 Martinez SCG Navigator Output Core Market WP\_2027 CAP
- Sup\_Ch 3 Martinez SCG Summary WP\_2027 CAP
- Sup\_Ch 3 Martinez SDGE Meter Forecast WP-2027 CAP
- Sup\_Ch 3 Martinez SDGE Navigator Output Core Market WP\_2027 CAP
- Sup\_Ch 3 Martinez SDGE Summary WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG NC Retail Gas Demand UEG EWG LgCogen WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG Other Wholesale WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG Refinery WP\_2027 CAP

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- Sup\_Ch 5 Martinez SCG SmCoGen WP\_2027 CAP
- Sup\_Ch 5 Martinez CAT WP\_2027 CAP
- Sup\_Ch 5 Martinez CoreStorageAssetAllocation WP\_2027 CAP
- Sup\_Ch 5 Martinez CoUseFuel&UAF\_2027 CAP
- Sup\_Ch 5 Martinez SCG MDM\_Core WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG NC Com WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG NC Ind WP\_2027 CAP
- Sup\_Ch 5 Martinez SCG NC Retail Gas Demand EOR WP\_2027 CAP
- Sup\_Ch 5 Martinez SDGE DEG WP\_2027 CAP
- Sup\_Ch 5 Martinez SDGE NC WP\_2027 CAP
- Sup\_Ch 5 Martinez SDGE SmCogen\_2027 CAP
- Sup\_Ch 5 Martinez SDGE Summary WP\_2027 CAP
- Sup\_Ch 8 Seres\_Schmidt-Pines Tax 2024 Workpapers  
Ad Valorem&SIT\_FIT WP\_2027 CAP
- Sup\_Ch 10 Borkovich 2020 Open Season Awarded Capacity\_2027 CAP
- Sup\_Ch 10 Borkovich 2023 Open Season Awarded Capacity\_2027 CAP

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**Question 2.**

2. Please justify the assumption of zero capital costs for purposes of calculating the submeter discount.

**Response 2.**

While applicants are proposing a switch from LRMC to embedded costs for the purposes of cost allocation, the granularity of the embedded cost data is not currently sufficient to support the submeter credit calculation. Therefore, the submeter calculation is based on the Long Run Marginal Study, Chapter 9. Line Extension Allowance for residential customers is zero. SoCalGas Rule No. 20, C2, SDG&E Rule No. 15, C3. However, applicants do not oppose the inclusion of a capital component in this calculation.

Upon review of the rate models subsequent to the September 30, 2025 filing date, and as part of researching the submeter credit calculation, applicants discovered a potential understatement of the Large Master Meter rates (LMM).

In February 2010, SoCalGas migrated to a new cost allocation and rate calculation model, which modified the calculation of the LMM volumetric rate. Prior to 2010, the revenue allocated for calculation of the LMM volumetric rate included all residential revenue. After and since February 2010, the LMM volumetric rate was based only on revenues associated with the residential fixed customer charge. The LMM volumetric rate should consider all residential revenues, not just those associated with the fixed charge revenue.