

**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)  
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**Chapter 12 (Rate Design)**

**Question 1.**

In response to TURN DR 1, SoCalGas provided functional Excel workpapers accompanying its testimony.

- a. Please provide the updated version of these workpapers to reflect the latest errata testimony for Ch 12.
- b. Please provide and identify the functional Excel spreadsheets supporting each table and figure in Ch. 12a.
- c. Please provide and identify the functional Excel spreadsheets supporting each appendix in Ch. 12a.

**Response**

- a. Please see Excel file, Revised\_Ch\_12a\_SCG Rate Design Model\_12-29-2025.
- b. See Response 1.a.
- c. See Response 1.a.

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**Question 2.**

SoCalGas testimony Ch. 12a at p. MF-3 proposes a three-year CAP cycle. Why does SoCalGas propose a three-year as opposed to a four-year CAP cycle?

**Response**

In A.08-02-001, SoCalGas's and SDG&E's 2009 Biennial Allocation Proceeding (BCAP), Applicants recommended that instead of having a cost allocation proceeding every two years, as was the custom at that time, that the proceeding be every three years. D.09-11-006 approved a settlement agreement which, among other things, adopted a three-year TCAP cycle going forward. Until A.22-09-015, wherein Applicants proposed a four-year cost allocation proceeding cycle, Applicant's had presented each of their successive cost allocation proceedings as TCAPs. The settlement agreement resolving A.22-09-015, which was approved by D.24-07-009, included maintenance of the three-year cost allocation proceeding cycle. Applicants' proposal is therefore consistent with this regulatory history.

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**Question 3.**

SoCalGas testimony Ch. 12a at p. MF-3 states that the applicants used “three-year average gas demand forecasts” (2027-2029) for calculating proposed rates.

- a. Please provide a copy of these demand forecasts and identify the source(s).
- b. Did SoCalGas consider utilizing any other demand forecasts in the development of its proposed rates? If so, please provide the forecasts and explain SoCalGas’s choice. If not, please explain why not.
- c. Please confirm that these are the same forecasts used for cost allocation in SoCalGas testimony Ch. 8. If not, please explain SoCalGas’s choice to utilize different forecasts or scenarios.

**Response**

- a. Please see testimony of Ed Martinez Chapter 5a Tables EM-5, EM-6, EM-7, and EM-8.
- b. No, SoCalGas did not consider alternate forecasts, and we believe the forecast used is the best available.
- c. Confirmed.

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**Question 4.**

SoCalGas testimony Ch. 12a at p. MF-4 states that its 2027-2029 rates “are based on the base margins and regulatory accounts in present rates.”

- a. Please identify all the proceedings, and the authorized amounts for each, with revenues included in SoCalGas’s proposed rates modelled in this application.
- b. Does SoCalGas’s rate design modeling include any costs which have not yet been authorized for recovery by the Commission? If so, please identify the proceedings where SoCalGas has requested or plans to request these costs, and the requested amounts in each proceeding.
- c. Please list all the ongoing proceedings, and the requested amounts in each, where SoCalGas is seeking approval from the CPUC to collect additional revenue from ratepayers (if not provided in response to part (b)).
- d. Do SoCalGas’s rate design proposals reflect its upcoming GRC request? If so, please identify the associated costs.

**Response**

- a. **January 1, 2025, Transportation Rate Change:** Annual Update of Regulatory Accounts (\$154 million), Cost of Capital Adjustment (\$29 million), Total Revenues = \$4,863 million. Net decrease was \$152 million.

**February 1, 2025, Transportation Rate Change:** GRC and CAP implementation, described in detail in AL 6430-G-B, AL 3392-G, D.24-12-074. Primary drivers include a \$343M increase in base margin, and an 18-month recovery of the \$280 million GRCMA balance. Total Revenues = \$5,498 million. Net increase was \$636 million.

**July 1, 2025, Transportation Rate Change:** Transmission Integrity Management Program Balancing Account (TIMPBA), to remove the SoCalGas balance of (\$227) million and add the SDG&E balance of \$23 million. Total Revenues = \$5,290 million. net change (\$210) million includes FF&U, adjustments – Advice No. 6493-G.

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**September 1, 2025, Transportation Rate Change:** Implementation of CEMA (\$17 million), CPPMA (\$6 million) and DIMPBA (\$108 million), net change \$132.5 million (includes FF&U and adjustments) Total Revenue - \$5,422 million – Advice No. 6526-G.

Chapter 12 (Foster), Appendix A, page MF-A-1. Appendix A describes the normalization of September 1, 2024 Published rates. The normalization is used on Table MF-1.

- b. SoCalGas’s rate design modeling does not include any costs which have not yet been authorized for recovery by the Commission.
- c. See the table below:

Filing Description	Proceeding	Proposed Revenue Requirement with FF&U (\$000)
<b>Safety Affordability Reliability Proceedings</b>		
DIMP Interim Recovery	A.25-08-008	59,100
GRC PFM	A.25-05-015/016	527,112
TIMPBA Application	A.25-04-020	173,808
2024 GRC Track 3 (PSEP and WMPMA)	A.25-05-015/016	132,245
Application for Incremental Funding For CIS Replacement	A.25-05-004	21,000
Low Income Bridge Application	A.25-06-012	20,690
Line Extension Allowance Application	A.25-07-001	489
Angeles Link Phase 1	A-25-06-011	24,720
MASS Energy	A.25-08-009	9,973
Angeles Link Phase 2	A.24-12-011	273,335
TIMPBA (SDGE)	A.25-02-012	7,400
Advanced Meter Infrastructure Replacment Program (AMIR)	A25-12-019	291,067

- d. SoCalGas’s rate design proposals do not reflect its upcoming GRC request.

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**Question 5.**

SoCalGas testimony Ch. 12a at p. MF-4 states that “the Applicants’ gas demand forecast is generally declining for customer classes relative to the forecasts adopted in the 2024 CAP.” Please provide SoCalGas’s analysis supporting this statement that the gas demand forecast is declining relative to the 2024 CAP adopted forecasts.

**Response**

SoCalGas’s three-year average of the systemwide “average-year throughput” forecast adopted in the 2024 CAP is 8,461,949 MTH per year. The three-year average of the systemwide “average-year throughput” forecast proposed in this CAP application is 8,315,665 MTH per year.

According to Chapter 3 (E. Martinez), page EM-8, regarding the residential gas demand “This forecast reflects the demand reductions from SoCalGas’s energy efficiency programs, assumed fuel substitution and the effects of a weather design that exhibits declining heating degree days (HDDs) each year over the forecast period.” Page EM-11, regarding the Core Commercial and Industrial, “The decline is driven by a confluence of factors, including energy efficiency, fuel substitution, and the effects of a weather design that declines by 7 HDD/year over the forecast horizon.” For more detailed analysis, refer to Chapter 3 workpapers.

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**Question 6.**

SoCalGas testimony Ch. 12a at p. MF-5 provides Tables MF-1, with the second column (B) titled “Proposed rate.” Does this column reflect SoCalGas’s proposals in this application, applied to 2025 revenues, or SoCalGas’s actual 2025 rates? Please clarify the meaning of “Proposed” here.

**Response**

The proposed rate shown is an impact of the changes sought in the September 30, 2026 CAP application, overlaid on the “normalized” rates that were effective when the application was filed. “Normalized” rates are described in Ch. 12a, Appendix A.

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**Question 7.**

SoCalGas testimony Ch. 12a at p. MF-9 discusses the Commission’s approval of an electric fixed charge in 2024. Does SoCalGas acknowledge that the Commission approved the electric fixed charge in part to reduce the volumetric price of electricity to encourage additional electricity use?

**Response**

SoCalGas objects on the ground the request calls for speculation as to the Commission’s intent and on the ground that the request calls for a legal conclusion. If there is a specific statement or language from a Commission decision or resolution, SoCalGas can respond to such request to acknowledge the Commission’s statement or findings at that time.

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**Question 8.**

SoCalGas testimony Ch. 12a at p. MF-12 states that residential customers using up to 7.9 therms (non-CARE) or 10.7 therms (CARE) per month receive fixed cost subsidies when the customer charge is \$5 or \$4 respectively. Please provide this analysis, showing all formulas and inputs, or identify where this is calculated in SoCalGas’s workpapers.

**Response**

Please see, “TURN-003\_Q8\_Revised\_SCG Fixed Cost Analysis\_12-29-2025”, on TAB “SCG Bill Impact 1-20 th”.

For non-CARE customers, average monthly bills are calculated for 1-20 therm usage levels, for fixed charge \$5 (AC66:AC85) scenario, then compared to Minimum Fixed Cost of Service (calculated on TAB “Minimum Fixed Cost of Service”).

For CARE customers, average monthly bills are calculated for 1-20 therm usage levels, for fixed charge \$4 (AC116:AC135) scenario, then compared to Minimum Fixed Cost of Service (calculated on TAB “Minimum Fixed Cost of Service”).

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**Question 9.**

SoCalGas testimony Ch. 12a at p. MF-13 cites the Commission’s denial of its 2024 customer charge proposal. Since that decision, what factors does SoCalGas contend have changed which justify its customer charge proposal in this proceeding?

**Response**

Applicants object to the extent the request assumes facts not in evidence and to the extent the request calls for a legal conclusion. Subject to and without waiving the foregoing, Applicants provide the following response: While the 2024 CAP decision did acknowledge that this issue should be considered in the Gas Planning Rulemaking (R.20-01-007, replaced subsequently by 24-09-012), SoCalGas proposes to institute an enhanced fixed charge in its 2027 CAP for the following reasons, among others:

1. As discussed in Chapter 12a at page MF-31 beginning at Line 11, this issue was addressed directly by Commissioner Karen Douglas (Assigned Commissioner overseeing R.20-01-007 and now R.24-09-012). In essence, Commissioner Douglas expressed a perspective that the existence of the gas planning rulemaking should not preclude the Commission from addressing issues in real time as such issues are brought in other appropriate and timely forums.
2. While the enhanced fixed charge is likely to provide more just, reasonable, and equitable rates whereby gas customers overall are paying a fairer share of their costs of service through a given long-term energy transition scenario involving gas end use fuel substitution, which is a potentially relevant issue for R.24-09-012, the proposal presented in the 2027 CAP Application does not rely on these benefits but rather demonstrates the immediate, back-tested affordability benefits available today.

While R.24-09-012 does include work in Phase 2 including but not limited to, “actions and metrics related to decarbonization goals, rates and affordability, safety and reliability, workforce, and equity,” by nature of falling under Phase 2, it is related to “Long-Term Gas Transition

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Planning.”<sup>1</sup> In addition to only addressing one secondary consideration having to do with long-term transition planning rather than the more urgent immediate affordability benefits demonstrated in the current CAP Application (as discussed above).

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<sup>1</sup> See ASSIGNED COMMISSIONER’S SCOPING MEMO AND RULING for R.24-09-012 dated January 31, 2025 at page 3 (available here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M555/K960/555960635.PDF>)

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**Question 10.**

SoCalGas testimony Ch. 12a at p. MF-15 presents SoCalGas’s customer charge proposal. Did SoCalGas consider any alternative fixed charge levels between \$5 and \$20 in the development of its proposal? If so, please identify each alternative and provide SoCalGas’s bill impacts analysis, including supporting workpapers in live Excel format.

**Response**

As presented in testimony, SoCalGas considered a \$12 fixed charge for 2027. For bill impact analysis please refer to respective scenario in “TestimonyTbl-Rate Impact” tab of “Revised\_Ch\_12a\_SCG Rate Design Model\_12-29-2025” workpaper, bill impacts are presented excel rows 38 and 39.

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**Question 11.**

SoCalGas testimony Ch. 12a at p. MF-15 discusses the CARE discount and its customer charge proposal:

- a. Is the effective 20% CARE discount currently inclusive of both the discount on the customer charge and the discount on volumetric charges, or is the discount on the customer charge incremental to the volumetric discount?
- b. Will SoCalGas’s response to (a) be unchanged under its new customer charge proposal? If not, please explain the reason for the change in its proposal.
- c. SoCalGas states that it will recover the lower CARE fixed customer charge through residential transportation rates. Does SoCalGas currently recover the CARE customer charge discount through residential transportation rates? If not, please explain how SoCalGas currently recovers the discount and the reason for changing that method in its proposal.
- d. Please identify the statutes and/or regulatory decisions supporting SoCalGas’s methodology for calculation and recovery of the CARE discount.

**Response**

- a. Currently the CARE discount of 20% applies to both the fixed charge and the volumetric charge.
- b. The CARE discount will be unchanged. SoCalGas proposes a net effective 50% lower fixed customer charge for CARE customers, comprised of the 20% CARE discount and an additional reduction accomplished through the transportation rate design.
- c. The existing CARE discount is not recovered through transportation rates. Currently, the CARE discount is recovered via Public Purpose Program Surcharge (PPPS) rates. Currently SoCalGas residential CARE customers receive a 20% discount on their fixed customer charge that is recovered through the PPPS rate as part of the CARE program. SoCalGas is not proposing to change that process. SoCalGas proposes that for CARE customers, 20% of the non-CARE fixed charge would be recovered through the PPPS rate. SoCalGas proposes to then set the effective billed fixed charge for CARE customers

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at 50% of the fixed charge for non-CARE customers. As of today, residential ratemaking would consist of first determining the amount of residential revenue requirement would be recovered by the fixed charge, and the balance of the residential revenue requirement would be allocated to the volumetric rates.

- d. Decision 21-06-015 implements Public Utilities Code § 739.1 by approving the administration, funding, and design of the CARE, FERA, and Energy Savings Assistance programs for the 2021–2026 period.

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**Question 12.**

SoCalGas testimony Ch. 12a at p. MF-16 indicates that its proposal to increase the customer charge would decrease volumetric rates by over 50% in 2029 relative to rates in 2027. Does SoCalGas believe that a higher customer charge for gas customers will increase, decrease, or have no impact on customer gas usage?

**Response**

SoCalGas has not conducted studies to estimate the change in residential volume resulting from implementation of its fixed charge proposal. However, SoCalGas observes that certain rate components, like commodity charges, public purpose program surcharges, and additional costs like Cap-and-Invest expenses, will be unaffected by the customer charge proposal and will continue to be charged volumetrically.

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**Question 13.**

SoCalGas testimony Ch. 12a at p. MF-17 states that “as fixed customer charges increase, baseline rates decrease...”

- a. For residential customers using less than their baseline, has SoCalGas modeled any responsive increases in demand as a result of its proposed customer charge increase and volumetric rate decrease?
- b. If the answer to (a) is no, please explain why not.
- c. If the answer to (a) is yes, please provide this analysis.
- d. If the answer to (a) is yes, has SoCalGas factored this increase into the demand forecasts used in this application? Please explain.

**Response**

- a. No.
- b. SoCalGas does not presently know whether or how residential customers’ consumption might change as a result of implementing its proposed customer charge increase and volumetric rate decrease. SoCalGas did not undergo such an analysis in preparing its proposal.
- c. N/A
- d. N/A

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**Question 14.**

SoCalGas testimony Ch. 12a at p. MF-16 discusses baseline allowances.

- a. Please provide tables with the baseline allowances (1) authorized for 2025 and (2) proposed in this application for 2027-2029, broken down by climate zone and customer subgroup.
- b. For each month in 2025, please identify the number and percentage of residential customers with usage below the baseline allowance in each climate zone.
- c. Please disaggregate the monthly information provided in part (c) by CARE and non-CARE customers in each climate zone.
- d. Please further disaggregate the monthly number and percentage of CARE and non-CARE customers in each climate zone with usage below the baseline allowance provided in part (d) by quartile below baseline (i.e. 25%, 50%, 75% of baseline).
- e. Does SoCalGas contend that CARE customers with below-baseline usage in non-heating season months will be incentivized to increase gas usage under SoCalGas’s fixed charge proposal?
- f. Does SoCalGas contend that CARE customers with below-baseline usage in heating season months will be incentivized to increase gas usage under SoCalGas’s fixed charge proposal?
- g. Does SoCalGas contend that non-CARE customers with below-baseline usage in non-heating season months will be incentivized to increase gas usage under SoCalGas’s fixed charge proposal?
- h. Does SoCalGas contend that non-CARE customers with below-baseline usage in heating season months will be incentivized to increase gas usage under SoCalGas’s fixed charge proposal?

**Response**

- a. (1) Current residential baseline allowances have been effective since May 2021 and are shown in SoCalGas Schedule GR, Sheet 3 (SCG\_GAS\_G-SCHEDS\_GR) (2) SoCalGas is not proposing to modify the baseline allowances as part of this CAP application.
- b. Please refer to workbook “TURN-003\_Q14\_bcd” tab “Question 14-b”
- c. Please refer to workbook “TURN-003\_Q14\_bcd”, tab “Question 14-c”
- d. Please refer to workbook “TURN-003\_Q14\_bcd”, tab “Question 14-d”
- e. SoCalGas does not presently know whether the requested customers will be so-incentivized as SoCalGas did not undergo such an analysis in preparing its proposal. No such analysis

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currently exists. SoCalGas will evaluate the need for such analysis further when it prepares its rebuttal testimony.

- f. SoCalGas does not presently know whether the requested customers will be so-incentivized as SoCalGas did not undergo such an analysis in preparing its proposal. No such analysis currently exists. SoCalGas will evaluate the need for such analysis further when it prepares its rebuttal testimony.
- g. SoCalGas does not presently know whether the requested customers will be so-incentivized as SoCalGas did not undergo such an analysis in preparing its proposal. No such analysis currently exists. SoCalGas will evaluate the need for such analysis further when it prepares its rebuttal testimony.
- h. SoCalGas does not presently know whether the requested customers will be so-incentivized as SoCalGas did not undergo such an analysis in preparing its proposal. No such analysis currently exists. SoCalGas will evaluate the need for such analysis further when it prepares its rebuttal testimony.

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**Question 15.**

SoCalGas testimony Ch. 12a at p. MF-21 provides the bill impacts of its customer charge proposal for CARE and non-CARE residential customers broken down by climate zone for the essential usage bill, average usage bill, and additional metrics (Tables 8 and 9).

- a. Please provide the same residential bill impacts broken down by CARE status and climate zone for (i) single-family; (ii) multi-family; and (iii) small master-metered dwellings.
- b. Has SoCalGas conducted any other bill impacts analyses to evaluate the impacts of its customer charge proposal on low and middle-income customers, such as an analysis by income tranche, ZIP code, census tract, or housing type? If so, please provide each analysis and supporting workpapers. If not, please explain why not.

**Response**

- a. SoCalGas objects on the grounds the request calls for an analysis not prepared by the company. Subject to and without waiving the foregoing, SoCalGas responds as follows: the information pertaining to bill impacts is not readily available. The bill amounts for (i) single-family; (ii) multi-family are available in the workpaper “Revised\_Ch\_12a\_SCG Rate Design Model\_12-29-2025” tabs: “Res Bill Zone 1”, “Res Bill Zone 2”, “Res Bill Zone 3”. SoCalGas does not have bill amounts calculated for (iii) small master-metered dwellings.
- b. SoCalGas objects on the grounds the request calls for an analysis not prepared by the company. Subject to and without waiving the foregoing, SoCalGas responds as follows: No such analysis has been conducted.

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**Question 16.**

SoCalGas testimony Ch. 12a at pp. MF-23 and MF-24 provide Charts 4 and 5 with breakdowns of CARE and non-CARE residential customer bill impacts from the proposed customer charge for each usage decile.

- a. For each chart, please provide the usage range in therms and the average usage for each decile.
- b. For each chart, please provide the data in live Excel tables with an additional breakdown by climate zone. For example:

<b>CARE</b>									
	Decile 1			Decile 2			Decile 3 (etc.,)		
	\$4	\$10	Change	\$4	\$10	Change	\$4	\$10	Change
Climate Zone-1	—	—	—	—	—	—	—	—	—
Climate Zone-2	—	—	—	—	—	—	—	—	—
Climate Zone-3	—	—	—	—	—	—	—	—	—

  

<b>Non-CARE</b>									
	Decile 1			Decile 2			Decile 3 (etc.,)		
	\$5	\$20	Change	\$5	\$20	Change	\$5	\$20	Change
Climate Zone-1	—	—	—	—	—	—	—	—	—
Climate Zone-2	—	—	—	—	—	—	—	—	—
Climate Zone-3	—	—	—	—	—	—	—	—	—

- c. For the tables provided in response to (b), please provide the usage range in therms and the average usage for each decile broken down by climate zone and CARE status

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**Response**

- a. Please refer to workpaper “TURN-003\_Q8\_Revised\_SCG Fixed Cost Analysis\_12-29-2025”, tab “SCG Bill Impact-per Deciles”. For non-Care usage per decile cells J30:S41, for CARE usage per decile: J42:S53.
- b. For climate zone 1 please refer to the workbook “TURN-003\_Q8\_Revised\_SCG Fixed Cost Analysis\_12-29-2025”, TAB “SCG Bill Impact-per Deciles”, cells S328:AC356. SoCalGas has not conducted this analysis for Climate Zone 2 and 3.
- c. For Climate Zone 1 usage ranges please refer to workpaper “TURN-003\_Q8\_Revised\_SCG Fixed Cost Analysis\_12-29-2025”, tab “SCG Bill Impact-per Deciles”. For non-Care usage per decile cells J30:S41, for CARE usage per decile: J42:S53. SoCalGas has not conducted this analysis for Climate Zone 2 and 3.

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**Question 17.**

SoCalGas testimony Ch. 12a at p. MF-31 provides Chart 6 with the estimated breakdown of bill impacts for SoCalGas CARE customers from the proposed customer charge with a 50% reduction in gas load and 10% reduction in customer count.

- a. Please provide the estimated impacts for a non-CARE residential customer, in the same format and breakdown as Chart 6.
- b. Please provide the workpapers in active Excel format that would allow TURN to model the impacts of potential customer charges at different residential electrification levels.
- c. If the workpapers requested in (b) are unavailable, please estimate the annual, January, winter (Nov-March), July, and summer (May-Sep) bill impacts for the average CARE and non-CARE customer in each climate zone from SoCalGas’ proposed fixed charge in each year 2027-2029, in the following scenarios:<sup>2</sup>
  - i. Current residential usage and meters
  - ii. A 10% decline in residential usage, and 1% decline in customer meters
  - iii. A 25% decline in residential usage, and 5% decline in customer meters
  - iv. A 50% decline in residential usage, and 10% decline in customer meters

**Response**

- a. Please refer to the workpaper “Revised\_Ch\_12a\_SCG Rate Design Model\_12-29-2025”, tab “Res Bill Zone 1” row 204, scenarios 19 (Column AB) and scenario 20 (column AC) for non-CARE bills.
- b. Please refer to the workpaper “Revised\_Ch\_12a\_SCG Rate Design Model\_12-29-2025”. As per the response in part a. above, bill amounts are on tab “Res Bill Zone 1” row 204, scenarios 19 (Column AB) and scenario 20 (column AC) for non-CARE bills. Controls to manipulate volume and customer counts are located on tab “TCAP Assumptions”, scenarios 19 (Column AB) and scenario 20 (column AC). Input changes for these specific scenarios are controlled by numbers in AJ311:AJ470. Volume changes are defined in AJ311, AJ316, AJ321. Customer count changes are defined in AJ315, AJ320, AJ325.
- c. N/A

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<sup>2</sup> SoCalGas provided a similar response in R.24-09-012, SoCalGas response to TURN-SoCalGas-002 (Question 2).

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**In R.24-09-012, SoCalGas’s response to TURN-SoCalGas-002 (Questions 4-8),  
SoCalGas replied to the following questions. Please provide updated complete responses  
to these questions including data through the latest date available.**

**Question 18**

For each year 2005 to the present, and separately for each baseline territory as well as systemwide, please provide the following for the residential customer class disaggregated for CARE and non-CARE classes:

- a. The total number of customer accounts
- b. The annual gas sales (therms)
- c. The winter (Nov-March) gas sales (therms)
- d. The non-winter (April – Oct) gas sales (therms)
- e. The average customer consumption for the winter period
- f. The average customer consumption for the non-winter period

**Response**

Applicants object on the ground the request is overbroad, and seeks information not relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to the extent the request seeks information not in Applicants’ possession, custody, or control. Subject to and without waiving the foregoing, Applicants provide the following response: Applicants are providing data from 2017 to present since that is what is readily available to Applicants.

- a. Please refer to workbook “TURN-003\_ Q18Q19Q20”, tab “Q18-a”
- b. Please refer to workbook “TURN -003\_ Q18Q19Q20”, tab “Q18-b”
- c. Please refer to workbook “TURN-003\_ Q18Q19Q20”, tab “Q18-c”
- d. Please refer to workbook “TURN-003\_ Q18Q19Q20”, tab “Q18-d”
- e. Please refer to workbook “TURN-003\_ Q18Q19Q20”, tab “Q18-e”
- f. Please refer to workbook “TURN-003\_ Q18Q19Q20”, tab “Q18-f”

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**Question 19**

For each year 2005 to the present, for (i) non-CARE, (ii) CARE, and (iii) all residential natural gas customers, please provide:

- a. The annual number of residential customers per decile of consumption
- b. The annual total consumption for each decile of consumption
- c. The winter (Nov. – March) number of customers per decile of consumption
- d. The winter (Nov. – March) total consumption for each decile of consumption

**Response**

Applicants object on the ground the request is overbroad, and seeks information not relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to the extent the request seeks information not in Applicants' possession, custody, or control. Subject to and without waiving the foregoing, Applicants provide the following response: Applicants are providing data from 2017 to present since that is what is readily available to Applicants.

- a. Please refer to workbook "TURN-003\_ Q18Q19Q20", tab "Q19-a"
- b. Please refer to workbook "TURN-003\_ Q18Q19Q20", tab "Q19-b"
- c. Please refer to workbook "TURN-003\_ Q18Q19Q20", tab "Q19-c"
- d. Please refer to workbook "TURN-003\_ Q18Q19Q20", tab "Q19-d"

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**Question 20.**

Please provide the average annual and winter customer natural gas bill of a (i) CARE, (ii) non-CARE, and (iii) residential customer for each year 2017 through the present, in each baseline territory and systemwide.  
apers.

**Response**

Applicants object on grounds that the request seeks an analysis that has not been conducted by Applicants. Subject to and without waiving the foregoing, Applicants respond as follows: The following bill amounts were compiled with data that was readily available.

Bill amounts are provided for 2017-2025 Annual average recorded bill amounts provided in workbook “TURN-003\_ Q18Q19Q20”, tabs “Q20 By Baseline Territory” and “Q20 by System Total”

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**Question 21.**

Please provide the forecast of residential (i) non-CARE and (ii) CARE natural gas customer accounts for the next twenty years or longest timeframe available.

**Response**

See TURN-003\_Q21.xlsx. A forecast of CARE customers is not available beyond 2031.

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**Question 22.**

Please provide the annual and winter (Nov-March) forecast of residential (i) non-CARE and (ii) CARE customer gas sales for the next twenty years or longest timeframe available.

**Response**

See TURN-003\_Q22.xlsx. A forecast of CARE sales is not available beyond 2031.

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**Question 2-24.**

Re: Chapter 11, Figure BD-1. Please provide the annual throughput under Schedule GO-CEG for each year since that optional rate was introduced. Where do these volumes appear in the throughput forecast tables included in Chapter 5?

**Response**

As it relates to the volumes shown in the Chapter 5 forecast tables, the GO-CEG throughput is consolidated into the core C&I segment.

See Excel file, Turn-002\_Q.2-24.

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**Question 2-25.**

Please provide a step-by-step explanation of how Gas Engine rates are determined, starting with the proposed allocation of base margin of \$7.611 million shown in Table FS-MSP-30 and walking through each additional step to reach the proposed rate of \$0.30401 per therm shown in Table MF-1. In particular, please explain why the proposed revenues from the Gas Engine class of \$5.16 million are less than the base margin allocated to that class.

**Response**

The Gas Engine rates and revenue have a cap. In the revised Direct Testimony of M. Foster (Chapter 12a), the amount for Gas Engine in Table MF-1 the Gas Engine’s proposed revenues are \$4.9 million, and the proposed rate is \$0.29140/therm. The workpaper, Revised\_Ch\_12a\_SCG Design Model\_12-29-2025, tab: Rates, Cell T310 shows the calculation: Average Year Throughput of 16,975 Mth \*1000 \* Rate Cap \$0.29140 = \$4.9 million. Below is listed the Gas Engine revenues (Cells T303:T312):

Total Allocated Base Margin post-SI, post-BTS Unbundle	7,611,492
Plus Other Operating Costs	457,118
Plus Regulatory Accounts	2,009,922
Plus CSITPMA Allocated to Gas Engine	11,178
Plus GHG Allocated to Gas Engine	3,205,870
Plus CARB Allocated to Gas Engine	55,537
Total Transportation Revenue	13,351,117
Transportation Revenue Subject to Rate Cap	4,946,406
Gas Engine Rev Allocated to Other Classes	8,404,710
Gas Engine Rev Allocated to Gas Engine	4,946,406

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**Question 2-26.**

When was the Gas Engine rate class established? Please provide a reference to the Commission decision approving that rate class.

**Response**

Applicants object on the ground the request calls for a legal conclusion and to the extent it seeks information equally available to the propounding party. Subject to and without waiving the foregoing, Applicants provide the following response: the earliest decision Applicants could identify with the Gas Engine rate was CPUC Decision 94-12-052, in December 1994, which approved the Gas Engine rate for SoCalGas.