

**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 2 FROM WESTERN MANUFACTURED HOUSING
COMMUNITIES ASSOCIATION (WMA) DATED: MARCH 17, 2026
SOCALGAS RESPONSE DATED: APRIL 1, 2026-Revised**

Question 1.

Please Refer to the Response to Data Request WMA Set 1, Question 2.

- a. Please explain why “the granularity of the embedded cost data” is insufficient to support the submeter credit calculation.
- b. The data response states that “applicants do not oppose the inclusion of a capital component” in the submeter discount calculation. Are applicants now proposing a non-zero capital cost for purposes of calculating the submeter discount? If so, please explain this proposal. If not, why not?
- c. Is SoCalGas proposing to correct an error in the Large Master Meter rates in this proceeding? If so, please explain this proposal and quantify the rate impact for Large Master Meter rates.

Response

- a. In the embedded cost study, the historical meter and service line data are not broken down by single residential and master meter. The embedded capital costs are shown by function: Storage, Transmission, Distribution and General Plant. FERC Accounts 380, 381, 383 (for service, meters and regulators) are part of Distribution. The O&M Accounts, Account 892: Services, Account 893: Meters & House Regulators, Customers Services (Accounts 907 – 910), Customer Accounts (Accounts 901 – 905) and A&G are also not broken down by single residential and master meter.
- b. Applicants are not changing their proposal.
- c. SoCalGas is not proposing to correct an error in the Large Master Meter rates.

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Question 2.

Please refer to the following text from the rebuttal testimony of Michael Foster in A.22-09-015 at page 15, lines 2-10:

“While D.22-09-026 effectively eliminates SRM related capital costs for most incremental residential customers, legacy capital costs are not eliminated by D.22-09-026. D.04-04-043 specifies that capital related costs should be included when determining the submeter credit. Both SoCalGas Schedule GS and SDG&E Schedule GS which defines the submeter credits in question are closed to new customers. They were both closed as of December 15, 1981, for gas service to new Multi-family Accommodation structures where such multi-unit tenants use gas directly in gas appliances in each occupancy and which requires venting. They were both also closed to new Mobilehome Parks or manufactured housing communities for which construction has commenced after January 1, 1997.”

Do applicants still agree with this position. If not, please explain how applicants’ position has changed and why.

Response

Yes.