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Application: A.25-09-XXX
Witness: P. D. Borkovich
Chapter: 10^a

PREPARED DIRECT TESTIMONY OF PAUL D. BORKOVICH ON BEHALF OF
SOUTHERN CALIFORNIA GAS COMPANY AND SAN DIEGO
GAS & ELECTRIC COMPANY
(OFF-SYSTEM DELIVERY AND BACKBONE
TRANSPORTATION SERVICE PROPOSALS)

September 30, 2025

(Redlined dated June 9, 2026)

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1 **CHAPTER 10**

2 **PREPARED TESTIMONY OF PAUL D. BORKOVICH**

3 **(OFF-SYSTEM DELIVERY AND BACKBONE**

4 **TRANSPORTATION SERVICE PROPOSALS)**

5 **I. PURPOSE**

6 The purpose of my testimony is to submit proposals to (1) apply Noncore Storage
7 Balancing Account (NSBA) overcollections to the Firm Access Storage Rights Memorandum
8 Account (FASRMA) until the current under collection is fully offset; (2) modify Backbone
9 Transportation Service (BTS) to limit the maximum amount of firm BTS available for sale to
10 110% of the minimum backbone system design standard based on the average day quantity in a
11 1-in-10 cold and dry year; and (3) modify SoCalGas Rule 30 Operational Requirements to
12 confirm BTS nominations up to the Total Net System Capacity for the Evening, Intraday 1,
13 Intraday 2, and Intraday 3 cycles regardless of a Gas Day's OFO status.

14 **II. BACKGROUND**

15 Southern California Gas Company (SoCalGas) and San Diego Gas & Electric (SDG&E)
16 own and operate an integrated gas transmission system, consisting of pipeline and storage
17 facilities. With their network of transmission pipelines and four interconnected storage fields,
18 SoCalGas delivers natural gas to 21.8 million consumers through 5.9 million meters in more than
19 500 communities. SDG&E delivers natural gas to 3.3 million consumers through 0.9 million
20 meters. The portion of the transmission system that interconnects upstream with the Pacific Gas
21 & Electric (PG&E) system and the interstate pipeline systems at receipt points, and downstream
22 with the storage fields, local transmission systems, and SDG&E's distribution system is referred
23 to as the backbone system. The backbone system is designed to accept up to 3,775 million cubic

1 feet per day (MMcfd) of upstream pipeline deliveries and local California supplies on a “firm”
2 basis, provided sufficient demand and injection capacity is available. However, accepting 3,775
3 MMcfd would require a Total Net System Capacity equal to or higher than this amount which
4 occurred only 34 days in 2022, 46 days in 2023, and 17 days in 2024, an average of 32 days per
5 year¹.

6 Operation of the SoCalGas/SDG&E system is the responsibility of the SoCalGas System
7 Operator, and the real time control of the system is the responsibility of the Gas Control
8 department.

9 Forward haul transportation service on the backbone system is referred to as Backbone
10 Transportation Service (BTS). Back haul service via upstream displacement at PG&E and
11 interstate pipeline system receipt points are referred to as Off-System Delivery (OSD) service.
12 All gas received and transported on the SoCalGas/SDG&E system must be nominated and
13 scheduled under a BTS contract. There are currently 5 nomination cycles applicable to each Gas
14 Day² available for the scheduling of BTS.

15 **Table PDB-1 – Gas Transportation Scheduling Cycles**

Cycle Name	Cycle Number	Nomination Deadline	Schedule Effective
Timely	C1	11 AM – Day Ahead	7 AM – Gas Day
Evening	C2	4 PM – Day Ahead	7 AM – Gas Day
Intraday 1	C3	8 AM – Gas Day	12 PM – Gas Day
Intraday 2	C4	12:30 PM – Gas Day	4 PM – Gas Day
Intraday 3	C5	5 PM – Gas Day	8 PM – Gas Day

¹ Refer to my accompanying workpapers, Chapter 10 Workpapers, Paul D. Borkovich (Off-System Delivery and Backbone Transportation Service Proposals) for data to support this calculation.

² The Gas Day begins each day at 7:00 AM Pacific Time.

1 Direct responsibility for administering the scheduling process is assigned to the Gas
2 Scheduling Department.

3 Both core and noncore customers can acquire firm BTS rights by contracting for capacity
4 in the triennial open season process³ or through SoCalGas's electronic bulletin board, SoCalGas
5 ENVOY® (Envoy), as capacity becomes available.⁴ Under the current rate schedule for BTS
6 (G-BTS), the availability of the 3,775 MMcfd of firm BTS capacity that is only limited by
7 capacity reductions attributable to outages posted on the Envoy, while the ability to nominate
8 and schedule gas up to this capacity is limited by the Total Net System Capacity of each
9 scheduling cycle.

10 BTS customers contract for firm capacity at specific system receipt points that are
11 defined as primary within a specific transmission zone. The locations of system receipt points
12 and transmission zones on the SoCalGas/SDG&E system are shown on the map below.

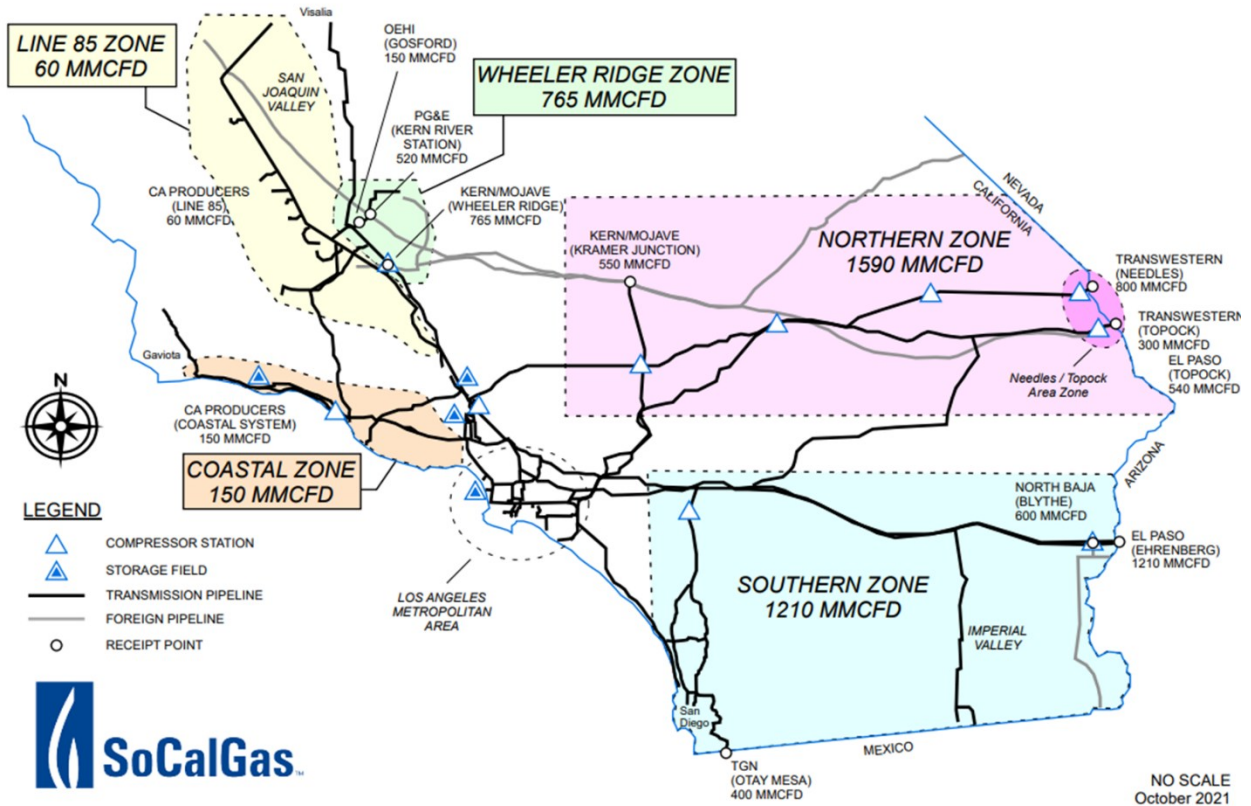
³ The BTS open season is currently a triennial process.

⁴ Envoy covers the combined SoCalGas/SDG&E transmission system. *See also* SoCalGas, Schedule G-BTS: Backbone Transportation Service, *available at:*
<https://tariffsprd.socalgas.com/view/tariff/?utilId=SCG&bookId=GAS&tarfKey=465> .

1
2

Figure PDB-1: SoCalGas and SDG&E System Receipt Points and Transmission Zone Locations

RECEIPT POINT & TRANSMISSION ZONE FIRM CAPACITIES



3

4 BTS customers can nominate transportation service under their firm contract either (1) at
5 their primary receipt point (Firm Primary); (2) at another system receipt point within the
6 transmission zone where their firm primary receipt point is located (Firm Alternate Inside);
7 and/or (3) at another system receipt point outside the transmission zone where their firm primary
8 receipt point is located (Firm Alternate Outside). Interruptible BTS can be nominated at any
9 system receipt point. The confirmation order for the scheduling of BTS is (1) Firm Primary; (2)
10 Firm Alternate Inside; (3) Firm Alternate Outside; and (4) Interruptible.

1 **A. OSD Service Background**

2 On December 15, 2006, the Commission issued Decision (D). 06-12-031 authorizing
3 SoCalGas and SDG&E to implement OSD service to PG&E. It adopted a fixed charge of five
4 cents per Dth for interruptible deliveries. OSD service implementation costs were recorded in
5 the Firm Access Rights Memorandum Account (FARMA). OSD service to the PG&E system
6 was authorized at a time when the potential for large quantities of LNG deliveries to California
7 was anticipated. The Commission envisioned the adoption of OSD service as a means for gas
8 suppliers on the SoCalGas system to deliver gas to PG&E customers while potentially reducing
9 transportation rates for SoCalGas customers as well.

10 Pursuant to Commission decisions D.06-04-033 and D.06-12-031, and Resolution G-
11 3407, an expanded Intrastate Transmission Balancing Account (ITBA) was established to
12 implement system integration, firm access rights and off-system delivery service. Under the
13 ITBA FAR Subaccount, interruptible OSD revenues would be aggregated with FAR revenue to
14 offset authorized FAR revenue requirements. A separate balancing account mechanism for
15 interruptible OSD was not requested at that time.

16 Pursuant to Ordering Paragraph 30 of D.07-12-019 the FARMA was replaced with the
17 FASRMA to record reasonable costs for new services in addition to the existing FARMA
18 balance that included system development costs required to implement interruptible OSD service
19 to PG&E. Subsequently, D.09-11-006 adopted the 2009 BCAP Phase 2 Settlement that agreed to
20 allocate the FASRMA on an Equal Cents Per Therm (ECPT) basis into rates.

21 On March 10, 2011, the Commission issued D.11-03-029 authorizing the expansion of
22 Off-System Delivery (OSD) Service to all upstream pipeline interconnections on the
23 SoCalGas/SDG&E system. By 2011 the idea that excess LNG-based supply on the SoCalGas
24 system would be available for OSD was no longer seen as likely. The new expectation

1 expressed by SoCalGas was that expansion of OSD services would provide various benefits
2 including increased utilization of the transmission system and demand for currently available
3 unbundled storage inventory that would be available to serve gas markets upstream from the
4 SoCalGas/SDG&E system.⁵

5 Adopted terms and conditions for Interruptible OSD required that service 1) should not
6 be subsidized by on-system customers; 2) should have no adverse impact on services provided to
7 on-system customers; 3) be provided on a displacement basis; and 4) be offered under a rate
8 range between five (5) and fifteen (15) cents per Dth.⁶

9 Pursuant to D.11-03-029 and D.11-04-032 the System Reliability Memorandum Account
10 (SRMA), FASRMA, and Backbone Transmission Balancing Account (BTBA) were revised to
11 accommodate the implementation of an expanded OSD service. The SRMA was revised to
12 record the cost of system reliability transactions resulting from providing OSD services on the
13 Southern System. FASRMA was revised to record incremental costs required to implement
14 expanded OSD service and OSD revenue until the incremental system development costs were
15 fully offset. The BTBA was revised to record all OSD revenues that exceeded 1) OSD revenues
16 recorded in the SRMA to offset OSD-caused system reliability costs and 2) full recovery of
17 system incremental costs recorded in FASRMA. The remaining OSD revenues recorded in the
18 BTBA would then be allocated to the SoCalGas and SDG&E backbone transportation customers
19 on an equal cents per therm basis.⁷

⁵ D.11-03-029 at 7.

⁶ *Id.* at 49 (Ordering Paragraph (OP) 1).

⁷ SoCalGas Advice Letter 4258: Expansion of Off-System Delivery at 2, *available at*:
<https://tariffsprd.socalgas.com/view/filing/?utilId=SCG&bookId=GAS&flngKey=2013&flngId=4258&flngStatusCd=Approved>.

1 As of August 2025, OSD revenues have not offset incremental system development costs.
2 Net Interruptible OSD revenue totaled less than \$30thousand from 2012-17; and zero from 2018-
3 2025 when OSD was not offered. Revenue from 2012-2017 was minimal because City Gate
4 prices were generally higher than upstream border prices when offered. During those rare
5 instances when City Gate prices were lower than Border prices OSD service was not offered
6 based on System Operator concerns that OSD service would impact service to on-system
7 customers.

8 Starting in 2017, OSD has not been offered due to continuing concerns that significant
9 OSD activity would impair service to on-system customers due to system capacity loss from
10 ongoing backbone transmission and storage system inspection and remediation⁸.

11 **B. 2023 BTS Open Season**

12 SoCalGas/SDG&E conducted the 2023 BTS Open Season beginning June 8, 2023, for
13 contracts effective October 1, 2023. As was the case for the 2020 open season, several extended
14 maintenance outages were in effect prior to the start of the 2023 open season. BTS capacity
15 subject to an indefinite outage prior to Step 1 of the open season process or an outage extending
16 for more than 30 days during the open season term was not offered during any phase of the open
17 season.⁹ The ongoing Southern Zone outage due to limited market demand within the zone
18 continued to be treated as an indefinite maintenance outage during the 2023 BTS Open Season
19 term. The result was less than the Total Transmission Zone Firm Access Capacity was offered in
20 the 2023 open season. The available firm capacity offered for the 2020 and 2023 open seasons
21 are tabulated below.

8 Refer to my accompanying Chapter 10 Workpapers.

9 SoCalGas Rate Schedule G-BTS at Sheet 15.

Table PDB-2 – Total 2020 and 2023 BTS Capacity Offerings (in MMCfd)

Zone	Year 2020	Year 2023
Southern Zone	750	650 685
Northern Zone	990	1,425 1,250
Wheeler Ridge Zone	765	765
CP Line 85 Zone	60	60 60
CP Coastal Zone	150	150
Total Offering	2,715	3,050 2,910

A higher quantity of firm BTS capacity was offered in 2023 than in 2020. Completion of some extended maintenance activity coupled with improved outage planning and forecasting were contributing reasons for the higher 2023 BTS open season capacity offering.

BTS capacity is allocated to customers during the open season in three steps. The Step 1 Set Aside round is reserved for core customer balancing agents holding firm capacity on upstream pipelines, California Producers, and Rule 39 expansion and displacement capacity shippers. Step 2 is reserved for meeting core and noncore customer requirements based on historical usage. Step 3 is open to any credit-qualified shipper for an annual base load quantity for 3–20-year terms. Capacity awards for each open season step for the 2020 and 2023 open seasons are shown on the table below.

Table PDB-3 – Total 2020 and 2023 BTS Capacity Awards (in MDth/day)

Open Season Step	Year 2020	Year 2023
Step 1	1,323	1,408
Step 2	1,151	1,132
Step 3	-0-	220
Total Award	2,474	2,759

1 **C. Previous Cost Allocation Proceeding**

2 On July 11, 2024, the Commission issued D.24-07-009 that adopted an all-party
3 settlement agreement addressing many issues including modifications to the G-BTS rate
4 schedule. Adopted G-BTS modifications included:

5 (a) Applicants are not required to implement a mechanism to provide
6 reservation charge credits.

7 (b) BTS open seasons will remain as three-year terms. The term of the next
8 open season, for capacity contracts effective October 1, 2026, will be extended by one
9 month, to end November 1, 2029.

10 (c) For the 2026 BTS open season, Applicants will implement a new rate
11 option, G-BTS5, which will be a firm volumetric rate option equal to 100% of the
12 reservation charge rate.

13 Commission approval of the all-party settlement also authorized conversion of the NSBA
14 to full balancing account treatment. As described in the direct testimony of Payal Gadani
15 (Chapter 6) the purpose of the NSBA is to balance the authorized embedded costs for unbundled
16 storage service with revenue from providing these services. The resultant balance is allocated to
17 gas transportation rates annually on an equal cents per therm basis.

18 **III. APPLICANTS' PROPOSALS**

19 **A. Unbundled Storage Revenue Overcollection Credits to FASRMA**

20 Under this proposal, the NSBA would be modified to credit recorded positive balances to
21 FASRMA prior to allocation into rates as part of the Annual Regulatory Account Balance update
22 until the current FASRMA balance reaches zero.

1 In D.11-03-029 the Commission stated that “it is difficult to predict what the future gas
2 demand, source of gas and market conditions will be like.”¹⁰ At the time of issuance of D.11-03-
3 029, SoCalGas/SDG&E expected that the expansion of OSD service to other SoCalGas and
4 SDG&E receipt points would 1) increase utilization of the backbone system, increase BTS
5 revenue, and lower transportation rates for on-system customers; 2) increase gas-on-gas
6 competition; and 3) increase storage utilization and unbundled storage revenues.¹¹

7 However, SoCalGas does not foresee any changes in gas demand, sources or market
8 conditions that would make on-system supply competitive in off-system markets. Furthermore,
9 available backbone and storage capacity is not as robust as it was back in 2011 at the time of the
10 issuance of D.11-03-029¹². Interruptible OSD has not been offered since December 2017, out of
11 concern that off system deliveries would reduce storage inventory over time and thus increase
12 the risk of an adverse system impact later in the ensuing winter withdrawal season. These
13 concerns remain more than seven years later.

14 Reductions in storage capacity attributable to the Storage Integrity Management Program
15 (SIMP) are expected to continue in the foreseeable future. And significant backbone
16 transmission system reductions attributable to continuing Pipeline Safety Enhancement Program
17 (PSEP), Gas Safety Enhancement Plan (GSEP), and Transmission Integrity Management
18 Program (TIMP) maintenance activity are expected to continue.. The combined effect of these
19 continuing outages reduces the level of System Operator confidence that enough slack storage
20 and backbone transmission capacity will be available to meet storage inventory targets while also

¹⁰ D.11-03-029 at 15.

¹¹ *Id.* at 7.

¹² Refer to my accompanying Chapter 10 Workpapers.

1 allowing any significant amount of OSD service to be scheduled for off-system delivery. As a
 2 result, the FASRMA balance continues to grow with no end in sight. At current rates, the \$4
 3 million balance would require approximately 80 Bcf of OSD service to be scheduled at the
 4 minimum 5 cents per Dth rate for full recovery. For these reasons SoCalGas respectfully request
 5 that the FASRMA balance receives overcollections from the NSBA until the FASRMA balance
 6 is zero.

7 **B. Reduction in Total Available BTS Capacity**

8 SoCalGas/SDG&E recommends that the quantity of firm BTS capacity available for
 9 customers to contract during the open season term should be reduced to minimize firm service
 10 over nominations and resulting nomination cuts. The firm contractual limit should be reduced
 11 from the current Total Transmission Zone Firm Access capacity (3,775 MMcfd) to 110% of the
 12 forecast minimum backbone system design standard adopted in D.06-09-039 and reaffirmed in
 13 D.22-07-002 based on the average day quantity in a 1-in-10 cold and dry year for the first
 14 calendar year of the open season term for the duration of the term.

15 **Table PDB-4 - Forecast Minimum Backbone Design Standards**

Year	Minimum Standard	110% of Minimum Standard
2024	2355	2591
2025	2333	2566
2026	2300	2530
2027	2262	2488
2028	2216	2438
2029	2198	2418
2030	2147	2362
2031	2105	2316
2035	2064	2270
2040	2091	2300

16 This capacity amount should be adequate to meet core and noncore customers bidding
 17 rights quantities based on historical usage for Step 1 and Step 2 of the BTS Open Season so long

1 as Step 3 capacity awards continue to be minimal. Maintenance outages affecting customer's
2 firm BTS capacity rights are expected to continue over the foreseeable future. As described
3 previously, major portions of the backbone system still require hydrotest or replacement in
4 compliance with PSEP,¹³ regular internal inspections and verification digs that identify wall loss
5 and damage requiring immediate repair or MAOP reduction continue under the Transmission
6 Integrity Management Program (TIMP),¹⁴ and most recently, maintenance required to comply
7 with the new and updated PHMSA Regulations¹⁵ all indicate that maintenance activity will
8 continue for the foreseeable future.

9 This lower BTS firm contract limit will allow firm BTS customers whose rights are
10 affected by maintenance outages to exchange firm BTS rights from affected receipt points to
11 receipt points where capacity is available or schedule their firm primary rights on an alternate
12 basis to receipt points with available capacity. SoCalGas's current requirement to offer capacity
13 for sale well in excess of 110% of the Minimum Standard increases the likelihood of system over
14 nominations and corresponding nomination cuts that require firm BTS customers to find
15 alternate gas supply to make up the shortfall, often at higher City Gate prices.

16 **C. Confirmation of BTS Nominations to System Capacity**

17 SoCalGas proposes confirming BTS nominations up to the Total Net System Capacity
18 during the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles regardless of a Gas Day's OFO

¹³ See A.22-05-015/016 (cons.) (SoCalGas 2024 General Rate Case), Direct Testimony of Bill G. Kostelnik (Pipeline Safety Enhancement Plan) (Exhibit (Ex.) SCG-08).

¹⁴ See A.22-05-015/016 (cons.), Direct Testimony of Amy Kitson and Travis Sera (Gas Integrity Management Programs) (Ex. SCG-09); see also Direct Testimony of Rick Chiapa, Steve Hruby and Aaron Bell (Gas Transmission Operations and Construction) (Ex. SCG-06-2R-E).

¹⁵ See A.22-05-005 (Application of SoCalGas and SDG&E for Authority to Establish a Gas Rules and Regulations Memorandum Account (GRMMA)), Direct Testimony of Travis T. Sera (May 4, 2022).

1 status when total nominations exceed the Total Net System Capacity.

2 SoCalGas and SDG&E currently confirm BTS nominations up to the Total Net System
3 Capacity during the Intraday 1, Intraday 2, and Intraday 3 cycles for Gas Days in which an OFO
4 was declared, and only during the Intraday 3 cycle on Gas Days in which an OFO was not
5 declared.

6 Delaying the confirmation of BTS nominations up to the Total Net System Capacity in
7 later scheduling cycles allows nominations of a lower confirmation order to be scheduled in
8 earlier scheduling cycles, thereby displacing nominations of a higher confirmation order in later
9 cycles, due to the elapsed pro-rata rules. Approval of this proposal would allow SoCalGas firm
10 BTS customers a better opportunity to schedule gas under their higher confirmation order
11 contracts, not just in earlier scheduling cycles, but in later scheduling cycles too and for
12 SoCalGas BTS to better conform with accepted industry practices.

13 This concludes my prepared direct testimony.

1 **IV. QUALIFICATIONS**

2 My name is Paul D. Borkovich. My business address is 555 West Fifth Street, Los
3 Angeles, CA 90013. I am employed by SoCalGas as the Energy Markets Segment Manager in
4 the Capacity Products Support Department. My responsibilities are to manage transportation
5 services provided by suppliers and marketers who provide gas to SDG&E and SoCalGas
6 customers. I also manage the Backbone Transportation Service program, the California Energy
7 Hub back office, policies and procedures for scheduling and nominations on the SDG&E and
8 SoCalGas systems, daily operation and enhancements to SoCalGas's Electronic Bulletin Board,
9 and all aspects of SoCalGas's and SDG&E's interconnect and operational balancing agreements
10 with pipelines delivering natural gas into their integrated transmission system. I have been
11 employed by SoCalGas in numerous positions relating to gas operations and gas markets and
12 have been responsible for various aspects of utility operations, sales and marketing, regulatory
13 matters, and customer relations.

14 I graduated in 1981 from the University of California at Santa Barbara, with a Bachelor
15 of Science degree in Mechanical Engineering, and in 1985 from the University of Southern
16 California with a Master of Science degree in Petroleum Engineering.

17 I have previously testified before the Commission.