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Application: A.26-06-____
Exhibit: SCG-13

PREPARED DIRECT TESTIMONY OF ALBERT J. GARCIA

ENVIRONMENTAL SERVICES

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



June 2026

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SUMMARY

| ENVIRONMENTAL SERVICES and STRATEGIC PLANNING & REGULATORY POLICY In 2025\$ (000s)¹ | | | |
|---|-------------------------------|--------------------------|---------------|
| O&M | 2025 Adjusted-Recorded | TY 2028 Estimated | Change |
| Non-Shared | 25,769 | 28,373 | 2,604 |
| Shared | 2,000 | 2,195 | 195 |
| Total O&M | 27,769 | 30,568 | 2,799 |

Summary of Requests

- This testimony addresses the entirety of environmental compliance and sustainability activities conducted by SoCalGas’s Environmental Services organization and the costs associated therewith. This testimony also addresses certain strategic planning activities carried out by Strategic Planning & Regulatory Policy and the associated costs.
- Environmental Services and Strategic Planning & Regulatory Policy collectively request adoption of a total Test Year (TY) 2028 forecast of \$30.568 million for operations and maintenance (O&M) expenses described in this testimony, comprising \$28.373 million in non-shared costs and \$2.195 million in shared costs. This represents a total increase of \$2.799 million over the adjusted recorded base year costs of \$27.769 million.
- Environmental Services requests adoption of its TY 2028 forecast of \$11.804 million for shared and non-shared O&M expenses. These expenses support environmental compliance activities and SoCalGas’s sustainable business priorities, in alignment with state and federal policies. This forecast represents an increase of approximately \$885,000 over the adjusted recorded base year costs of \$10.919 million.
- Strategic Planning & Regulatory Policy requests adoption of a TY 2028 forecast of \$2.463 million for shared and non-shared O&M expenses. This forecast

¹ Totals may include rounding differences.

represents an increase of approximately \$300,000 over the adjusted recorded base year costs of \$2.163 million.

- SoCalGas also requests authorization to continue the New Environmental Regulatory Balancing Account (NERBA), for which Environmental Services estimates TY 2028 non-shared O&M expenses of \$16.301 million, specifically related to Assembly Bill (AB) 32 costs. This forecast represents an increase of \$1.614 million over the adjusted recorded base year costs of \$14.687 million. Additionally, as further discussed herein, SoCalGas requests the Commission consider the re-establishing of a two-way balancing mechanism for the remaining NERBA sub-account specifically associated with AB 32 administrative fees billed annually to SoCalGas by the California Air Resources Board (CARB).

**PREPARED DIRECT TESTIMONY OF ALBERT J. GARCIA
ENVIRONMENTAL SERVICES**

I. INTRODUCTION

A. Summary of Environmental Services and Strategic Planning & Regulatory Policy Costs and Activities

My testimony supports the Test Year (TY) 2028 forecasts for shared and non-shared operations and maintenance (O&M) costs associated with Environmental Services and Strategic Planning & Regulatory Policy. Table AG-1 summarizes the sponsored costs.

**TABLE AG-1
Test Year 2028 Summary of Total Costs**

| ENVIRONMENTAL SERVICES and STRATEGIC PLANNING & REGULATORY POLICY | | | |
|--|-------------------------------|--------------------------|---------------|
| In 2025\$ (000s)² | | | |
| O&M | 2025 Adjusted-Recorded | TY 2028 Estimated | Change |
| Non-Shared Environmental Compliance | 9,556 | 10,361 | 805 |
| Non-Shared NERBA | 14,687 | 16,301 | 1,614 |
| Non-Shared Strategic Planning & Regulatory Policy | 1,526 | 1,711 | 185 |
| Shared Environmental Compliance | 1,363 | 1,443 | 80 |
| Shared Strategy & Financial Planning Leadership | 637 | 752 | 115 |
| Total O&M | 27,769 | 30,568 | 2,799 |

SoCalGas’s Environmental Services organization consists of employees who provide guidance and support for SoCalGas’s environmental compliance in the areas of natural resources, water quality, land use planning, hazardous materials and waste (HazMat), air quality, greenhouse gas emissions, and sustainability. Environmental Services supports SoCalGas’s efforts to comply with federal, state, regional, and local environmental laws, rules, regulations, and ordinances, as well as company policies and procedures. Environmental Services’ responsibilities include: (i) tracking and analyzing environmental regulations; (ii) developing compliance policies, procedures, and tools; (iii) developing and delivering training materials; (iv) developing and implementing internal quality assurance and quality control procedures; (v)

² Totals may include rounding differences.

1 screening projects for environmental compliance; (vi) developing plans to avoid and/or minimize
2 potential project environmental impacts; and (vii) developing and obtaining environmental
3 permits and plans. Environmental Services is also responsible for managing two SoCalGas
4 Treatment, Storage, and Disposal Facilities (TSDFs), remediation of contaminated media at
5 current and former utility and third-party sites, and for responding to emergency release events.

6 SoCalGas's Strategic Planning & Regulatory Policy includes Strategic Planning &
7 Regulatory Policy and Strategy & Financial Planning Leadership. Strategic Planning &
8 Regulatory Policy is responsible for a broad range of enterprise-level activities, including long-
9 term business strategy and goal setting, qualitative and quantitative analysis to drive business-
10 wide strategy (e.g. efficiency study directed by the CPUC), energy system scenario planning, and
11 integration of business objectives with regulatory policy, as well as supporting proceedings
12 before the CPUC. Strategy & Financial Planning Leadership is responsible for overseeing,
13 leading, and directly managing Strategic Planning & Regulatory Policy, Market Development,
14 Energy and Environmental Policy, Financial & Operational Planning, and Gas Acquisition
15 activities.

16 **B. Organization of Testimony**

17 My testimony is organized as follows:

- 18 • **Affordability & Efficiency:** Discusses how the departments leverage
19 internal and external resources, as well as new technologies to enhance
20 efficiency and streamline workflow.
- 21 • **Non-Shared O&M Costs and Activities:** Details forecasted costs and
22 activities for Environmental Compliance, Strategic Planning & Regulatory
23 Policy, and activity tracked and balanced in the New Environmental
24 Regulations Balancing Account (NERBA).
- 25 • **Shared O&M Costs:** Details forecasted costs shared with San Diego Gas
26 & Electric (SDG&E) for Environmental Compliance and Strategy &
27 Financial Planning Leadership.

28 **C. Support To and From Other Witnesses**

29 My testimony also references the testimony and workpapers of several other witnesses,
30 either in support of their testimony or as support for mine.

- 1 • Gas Major Projects (Ex. SCG-06) describes major project activities
2 supported by Environmental Services costs presented in this testimony.
- 3 • Gas Transmission & Storage (Ex. SCG-05) describes transmission and
4 storage activities supported by Environmental Services costs presented in
5 this testimony. This testimony also proposes transferring costs from the
6 New Environmental Regulations Balancing Account (NERBA) (Subpart
7 W and LDAR costs) into the O&M addressed in the Gas Transmission &
8 Storage testimony.
- 9 • Gas Distribution (Ex. SCG-04) describes distribution activities supported
10 by Environmental Services costs presented in this testimony.
- 11 • Compensation & Benefits (Ex. SCG-16/SDGE-20) describes the
12 compensation modernization initiative.
- 13 • Regulatory Accounts (Ex. SCG-21) describes SoCalGas's regulatory
14 accounts, including the NERBA.
- 15 • Information Technology (Ex. SCG-10) describes capital costs for
16 digitalized Environmental Management System (EMS) to manage
17 environmental compliance-related activities, processes, and best practices.
- 18 • Shared Services (Ex. SCG-22/SDGE-27) describes the practices for
19 allocating and billing shared services and shared assets in the TY 2028
20 General Rate Case.

21 **II. AFFORDABILITY & EFFICIENCY**

22 Environmental Services continually evaluates its workflow to support affordability and
23 efficiency. Environmental Services is undertaking several efforts to increase its ability to
24 comply with ever-changing environmental rules and regulations while using internal and external
25 resources efficiently. For example, Environmental Services partnered with San Diego Gas &
26 Electric Company (SDG&E) Environmental Services to implement a new Environmental
27 Management System (EMS) to streamline regulatory compliance efforts. Efficiencies and
28 associated cost reductions are achieved by securely maintaining compliance-related
29 documentation and sustainability data in a centralized database accessible to internal
30 stakeholders. The EMS converts hard copy retention practices into uniform digital records using

1 standardized naming conventions so that data analysis may be conducted, and emergency
2 response plans, permits and monitoring data are readily available.

3 To better support staff and project needs, Environmental Services drives contracting and
4 consultant support efficiencies through the use of pre-approved contractor pools under Master
5 Service Agreements (MSA). These MSAs secure predetermined hourly billing rates from
6 contractors for set terms, while avoiding the need to enter into individual agreements for each
7 project, saving time, costs, and resources.

8 In addition, Environmental Services is working to secure “programmatic” multi-year
9 permits from the California Department of Fish and Wildlife (CDFW) for routine operations and
10 maintenance activities of similar nature and impacts occurring in existing right-of-way corridors,
11 which will be more efficient as opposed to securing individual permits for individual projects.
12 Collectively, these efforts promote affordability by controlling costs and improving workflow.

13 Strategic Planning & Regulatory Policy supports affordability and efficiency from a
14 broad organizational and regulatory strategy perspective. The group translates near and long-
15 term priorities into actionable roadmaps that drive operational efficiency for the benefit of
16 ratepayers. It also provides input on key initiatives and regulatory filings to align policy
17 positions on issues such as affordability, with SoCalGas’s long-term vision.

18 **III. NON-SHARED COSTS**

19 “Non-Shared Services” are activities that are performed by a utility solely for its own
20 benefit. Corporate Center provides certain services to the utilities and to other subsidiaries. For
21 purposes of this general rate case, SoCalGas treats costs for services received from Corporate
22 Center as Non-Shared Services costs. SoCalGas’s Non-Shared Services costs that are addressed
23 in this testimony are identified in three primary cost categories: (i) Environmental Compliance;
24 (ii) NERBA; and (iii) Strategic Planning & Regulatory Policy. Table AG-2 summarizes the total
25 non-shared O&M forecasts for the listed cost categories.

TABLE AG-2
Environmental Services and Strategic Planning & Regulatory Policy
Non-Shared O&M Summary of Costs

| In 2025\$ (000s) ³ | | | |
|---|------------------------|-------------------|--------------|
| O&M | 2025 Adjusted-Recorded | Estimated TY 2028 | Change |
| Non-Shared Environmental Compliance | 9,556 | 10,361 | 805 |
| Non-Shared NERBA | 14,687 | 16,301 | 1,614 |
| Non-Shared Strategic Planning & Regulatory Policy | 1,526 | 1,711 | 185 |
| Total Non-Shared O&M | 25,769 | 28,373 | 2,604 |

A. Environmental Compliance

For TY 2028, Environmental Services requests adoption of a forecast of \$10.361 million for Non-Shared Environmental Compliance activities. This forecast represents an increase of approximately \$805,000 over the adjusted-recorded base year costs of \$9.556 million.

Environmental Compliance is a non-shared service comprising six areas: Environmental Services Director; Environmental Field Services; Environmental Programs; Planning, Cultural & Natural Resources; Major Project Support, and Sustainability (see Table AG-3).

TABLE AG-3
Environmental Compliance
Non-Shared O&M Summary of Costs

| In 2025\$ (000s) ⁴ | 2025 Adjusted-Recorded | TY 2028 Estimated | Change |
|---|------------------------|-------------------|------------|
| A. Environmental Services Director | 289 | 297 | 8 |
| B. Environmental Field Service | 1,836 | 1,773 | (63) |
| C. Environmental Programs | 4,551 | 4,709 | 158 |
| D. Planning, Cultural and Natural Resources | 1,442 | 1,964 | 522 |
| E. Major Project Environmental Support | 379 | 595 | 216 |
| F. Sustainability | 1,060 | 1,024 | (36) |
| Total Non-Shared O&M | 9,556 | 10,361 | 805 |

³ Totals may include rounding differences.

⁴ Totals may include rounding differences.

1
2 **1. Environmental Services Director**

3 **a. Description of Costs and Activities**

4 The Environmental Services Director provides leadership and strategic direction. The
5 Director supports and establishes policy and planning for environmental compliance across
6 multiple disciplines for day-to-day utility operations. The Director also leads efforts to assess
7 and implement compliance with emerging environmental regulations. Additionally, the Director
8 oversees strategy for planning, permitting and execution of environmental components of large-
9 scale infrastructure projects.

10 **b. Forecast Method**

11 A base year forecasting methodology was used to forecast labor and non-labor costs for
12 this cost category. This method is appropriate because the base year is representative of the cost
13 expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for this
14 forecast.

15 **c. Cost Drivers**

16 The primary cost drivers are labor and non-labor costs comprised of consulting fees and
17 costs related to department-wide functions. An adjustment of \$8,000 reflects changes in
18 connection with the compensation modernization initiative. Please refer to the Compensation
19 and Benefits testimony, Ex. SCG-16/SDGE-20. There are no upward or downward pressures
20 associated with this activity in the forecast period, as the base year funding is expected to be
21 sufficient to fund estimated expenses in the TY 2028 GRC forecast period.

22 **2. Environmental Field Services**

23 **a. Description of Costs and Activities**

24 Environmental Field Services manages environmental compliance for SoCalGas's natural
25 gas storage facilities, compressor stations, gas operations and customer service bases, and other
26 facilities throughout SoCalGas's service territory. Environmental Field Services also manages
27 the environmental portion of the company-wide Environmental and Safety Compliance
28 Management Program (ESCMP). ESCMP responsibilities include:

- 29 • Facilitating regulatory inspections at various SoCalGas's operating
30 facilities (approximately 250 per year);
- 31 • Conducting internal self-assessments for facility compliance
32 (approximately 95 per year);

- Developing and facilitating mandatory employee environmental training (approximately 4000 employee training completions per year); and
- Certifying annual compliance metrics.

Environmental Field Services also regularly updates environmental training materials to reflect changes in regulations.

Non-labor expenditures include:

- Facility-based expenses, including travel costs for Environmental Field Services staff to attend and support agency inspections at facilities across the SoCalGas service territory;
- Consultant support for reporting and permitting requirements; and
- Consultant support for employee training development.

b. Forecast Method

A base year forecasting methodology was used to forecast labor and non-labor costs for this cost category. This method is appropriate because the base year is representative of the cost expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for this forecast.

c. Cost Drivers

The primary cost drivers for this activity are labor and non-labor costs for permit compliance and consulting support. The TY 2028 forecast reflects a decrease of approximately \$63,000, primarily due to one FTE moving to shared service. Regulatory requirements drive operations and compliance activities at SoCalGas’s natural gas storage facilities, compressor stations, gas operations and customer services bases. These include the California Accidental Release Prevention (CalARP) Program, which governs the use of ammonia for air quality compliance at compressor stations, and the newly adopted Department of Toxic Substances Control (DTSC) Generator Improvements Rule (GIR),⁵ which requires enhanced emergency response preparedness strategies for environmental matters at SoCalGas facilities.

Permitting and compliance activities continue as agencies implement and enforce increasingly stringent air quality regulations, including the California Air Resources Board

⁵ Cal. Code Regs., Title 22, §§ 66262.262, 66262.16(b)(6)(F)2, 66262.256, and 66262.15.

1 (CARB) Oil and Gas Rule,⁶ which is enforced in coordination with local air districts and drives
2 more frequent inspections, documentation requirements, and corrective actions; increased air
3 quality permit reporting requirements; and enhanced enforcement initiatives by local air districts,
4 which require additional support to address evolving requirements and enforcement.⁷

5 **3. Environmental Programs**

6 **a. Description of Costs and Activities**

7 Environmental Programs manages and oversees the hazardous materials and waste
8 disposal operations for SoCalGas, which include:

- 9 • Operation of two Transportation, Storage, and Disposal Facilities (TSDFs); and
- 10 • Cleanup activities from gas operations and construction at SoCalGas facilities.

11 Environmental Programs also manages compliance for SoCalGas’s underground fuel storage
12 tanks (USTs) and refueling systems equipment for fleet operations.

13 **b. Forecast Method**

14 A base year methodology was used to forecast labor and non-labor costs for this cost
15 category. This method is appropriate because it includes specific costs related to new
16 environmental regulatory and program-related requirements and costs anticipated during the TY
17 2028 GRC forecast period, which are incremental to historically incurred costs. The forecast
18 starts with the most recent base year, representing a conservative base upon which to apply
19 forecasted incremental cost pressures and cost reductions.

20 **c. Cost Drivers**

21 Primary cost drivers for Environmental Programs include labor and non-labor expenses
22 for contracted services, permitting fees, analytical and laboratory fees, and disposal costs for
23 non-hazardous and hazardous waste. These activities are foundational to meeting regulatory
24 requirements and protecting employee safety, public health, and the environment.

25 UST compliance costs have increased and are expected to continue rising. USTs are
26 subject to extensive federal, state, and local oversight and require continuous monitoring, annual
27 and triennial testing, and routine certification to provide leak prevention—including equipment,
28 sensors and containment strategies that maintain system integrity in accordance with site specific

⁶ Cal. Code Regs., Title 17, §§ 95665–95677 and Appendices A-G.

⁷ Increased requirements are driven primarily by the following South Coast Air Quality Management District (SCAQMD) Rules 218, 317.1, 431.1, 462, 463, 1110.2, 1146, 1146.1, 1146.2, and 1148.2.

1 operating permits. Local Certified Unified Program Agencies (CUPAs) mandate annual testing
2 and certification of UST leak detection equipment, spill containment, and monitoring systems, as
3 well as triennial hydrostatic testing to verify the integrity of secondary containment and piping
4 systems. Local air pollution control districts (APCDs) require annual verification testing of
5 emissions control equipment used during fuel delivery and dispensing operations.

6 To support continued compliance and operations, Environmental Programs requests
7 additional labor costs to add one additional full-time employee (FTE) to manage two regulatory
8 programs that have imposed new regulatory requirements, namely the Generator Improvement
9 Rule⁸ and Los Angeles County's Construction & Demolition Debris Program.⁹ Both programs
10 involve substantial oversight, documentation, and reporting demands that cannot be absorbed by
11 current staffing. Without additional support, SoCalGas risks regulatory non-compliance, fines,
12 and operational delays affecting the groups this function supports. The requested FTE would
13 help meet increasing requirements, maintain accurate cradle-to-grave waste tracking, support
14 timely regulatory submissions, and mitigate risk.

15 **4. Planning, Cultural and Natural Resources**

16 **a. Description of Costs and Activities**

17 Planning, Cultural, and Natural Resources comprises subject matter experts (SMEs) in
18 biology, archeology, water quality, environmental engineering, and land use planning that
19 support SoCalGas day-to-day operations by conducting environmental reviews and issuing
20 clearances for company projects to support compliance with environmental laws and regulations.
21 Projects reviewed include pipeline valve replacements, pipeline installations, and gas well

⁸ The Generator Improvements Rule is implemented in California through amendments to Title 22, Division 4.5, of the California Code of Regulations (CCR). The primary sections applicable to the activities described include:

- § 66260–66262 (Hazardous Waste Generator Requirements)
- § 66262.13 – Generator category determination (LQG, SQG, VSQG)
- § 66262.14–66262.17 – Requirements for VSQGs, SQGs, and LQGs
- § 66262.15 – Satellite accumulation areas
- § 66262.16 – SQG emergency preparedness and prevention
- § 66262.17 – LQG contingency planning, labeling, closure, and accumulation rules
- § 66262.18 – Renotification requirements
- § 66262.262 – Quick Reference Guide for contingency plans (LQGs)

⁹ The Los Angeles County C&D Debris Recycling and Reuse Ordinance is codified primarily in Los Angeles County Code, Tit. 20, Ch. 20.87.

1 abandonments. The group collaborates with Gas Transmission, Gas Distribution, Gas Major
2 Projects, and Gas Storage, to develop strategies that proactively minimize or avoid
3 environmental impacts.

4 **b. Forecast Method**

5 A base year forecasting methodology was used to forecast labor and non-labor costs for
6 this cost category. This method is appropriate because the base year is representative of the cost
7 expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for this
8 forecast. Upward cost pressures during the TY 2028 GRC forecast period are expected to be
9 driven by incremental labor required to comply with specific proposed new environmental
10 regulatory and program-related requirements.

11 **c. Cost Drivers**

12 Primary cost drivers for these activities are employee labor. Upward pressure is
13 primarily driven by the addition of three FTEs. Two incremental FTEs will provide
14 environmental scientist support for SoCalGas projects subject to increasingly complex natural
15 and aquatic resource review obligations under recent and anticipated regulatory requirements.
16 Assembly Bill (AB) 1319 expands California Endangered Species Act (CESA) protections—
17 when the federal government reduces Endangered Species Act protections, the CDFW assigns
18 affected species to provisional candidate status with full CESA protections. As a result,
19 SoCalGas anticipates an increase in the number of species subject to state review with elevated
20 mitigation obligations, because CESA’s protective and compensatory requirements are more
21 stringent and resource-intensive than the federal framework they replace. These reviews require
22 new biological assessments and expanded survey requirements, increasing the technical
23 workload associated with environmental permitting and project planning. The CESA also
24 continues to add species to the endangered, threatened, and candidate lists. This expansion of
25 species under state protection further increases the volume of biological surveys, analysis, and
26 mitigation requirements for SoCalGas projects.

27 One incremental FTE will support cultural resource and tribal coordination requirements
28 that have increased due to state-level policy changes and ongoing CPUC reforms. This position
29 requires expertise in laws, regulations, and cultural resources pertinent to California Native
30 American tribes and will support consultation efforts with both federally recognized and non-
31 federally recognized tribes, in coordination with SoCalGas’s Regional Public Affairs. In 2025,

1 the California Natural Resources Agency (CNRA) released an updated Tribal Consultation
2 Policy establishing new requirements across all CNRA departments, boards, and conservancies.
3 Also in 2025, the Governor’s Office of Land Use and Climate Innovation initiated a major
4 update to California’s Tribal Consultation Guidelines, last revised in 2005, to reflect current
5 legal requirements and evolving best practices. These updated guidelines emphasize early tribal
6 involvement in land-use decisions, enhanced cultural resource protections, and a structured,
7 multi-year consultation framework—expanding the groups workload during project planning and
8 execution. Concurrently, the CPUC is revising its Tribal Consultation Policy through
9 Rulemaking (R.) 22-02-002, strengthening requirements for timely responsiveness, clarifying
10 consultation procedures, and expanding requirements for utilities to participate in early and
11 meaningful engagement with tribes. Collectively, these state-driven policies increase the
12 frequency, depth, and timing sensitivity of tribal coordination, substantially elevating cultural
13 resource workload for project proponents.

14 **5. Major Project Environmental Support**

15 **a. Description of Costs and Activities**

16 Major Project Environmental Support provides environmental planning, permitting, and
17 implementation support for construction projects as described in Gas Major Projects testimony
18 (Ex. SCG-06). Each staff member serves as environmental lead and SME for multiple projects
19 and is responsible for managing the full spectrum of environmental review, permitting, and
20 compliance activities in coordination with other groups within Environmental Services,
21 including the Air Quality, Planning, Cultural, and Natural Resources, and Environmental
22 Programs.

23 Gas Major projects are large-scale infrastructure projects that require experienced support
24 staff, including environmental project managers and environmental SMEs, who can coordinate
25 cross functionally across the organization to meet extended planning and construction timelines.
26 These projects are often subject to agency review pursuant to the California Environmental
27 Quality Act (CEQA) and the National Environmental Policy Act (NEPA), requiring expertise in
28 current regulations and compliance procedures.

29 **b. Forecast Method**

30 A base year forecasting methodology was used to forecast labor and non-labor costs for
31 this cost category. This method is appropriate because the base year is representative of the

1 expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for the
2 forecast.

3 **c. Cost Drivers**

4 Cost drivers for Major Project Environmental Support are driven by Gas Major Projects
5 and associated compliance requirements. Costs are variable based on the type of environmental
6 review, permitting, and compliance support required for each project. An increase of
7 approximately \$216,000 for this cost category is primarily due to the annualized FTE cost of an
8 intra-departmental transfer and an increase in O&M.

9 **6. Sustainability**

10 **a. Description of Costs and Activities**

11 Sustainability and GHG Reporting manages compliance with GHG-related rules and
12 regulations, including the Environmental Protection Agency (EPA) Greenhouse Gas Reporting
13 Program¹⁰ and the CARB Oil and Gas Rule for methane emissions.¹¹ The group also establishes
14 SoCalGas’s sustainable business priorities in alignment with state and federal policies, including
15 California’s goal to achieve state-wide carbon neutrality by 2045. This includes planning,
16 developing, and tracking near and long-term environmental, social, and governance (ESG)
17 strategies. The group works across SoCalGas’s organizations and through the Sustainability
18 Executive Steering Committee to facilitate dialogue on sustainability topics, cross-functional
19 collaboration, and implementation of sustainability initiatives and goals.

20 Sustainability and GHG Reporting monitors and assesses evolving ESG markets,
21 priorities, and requirements, coordinating to prepare for and implement new and evolving
22 climate disclosure standards. The group oversees deployment and implementation of
23 technologies to effectively track, monitor, and report on sustainability goals and key performance
24 indicator (KPI) metrics.

25 Key responsibilities include:

- 26 • Calculation and reporting of GHG emissions to state, federal, and non-
27 profit entities;

¹⁰ U.S. Environmental Protection Agency, Mandatory Greenhouse Gas Reporting Rule, 40 CFR § 98.

¹¹ Cal. Code Regs., Title 17, §§ 95665–95677 and Appendices A–G.

- Coordination and execution of sustainability goals through governance, development of procedures, controls, internal communications, and cross-functional collaboration with business units;
- Continuous assessment and development of sustainable business practices to achieve near-term emissions reductions and meet long-term climate objectives while creating opportunity and equity for employees, customers, and communities;
- Continuous development and implementation of tools to track sustainability strategies and KPIs for transparency and accountability; and
- Monitoring and engagement on new rules and regulations related to climate disclosures, regulatory preparedness, and developing systems and processes for compliance.

b. Forecast Method

A base year forecasting methodology was used to forecast labor and non-labor costs for this cost category. This method is most appropriate because the base year is representative of the expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for the forecast.

c. Cost Drivers

The primary cost drivers for Sustainability and GHG Reporting include labor charges and non-labor costs associated with compliance with state and federal GHG reporting requirements, and public climate disclosures; development of sustainability strategy framework and goals; and development of tools and systems to monitor and track KPIs. A cost reduction of approximately \$36,000 is anticipated through labor efficiency gains.

D. New Environmental Regulatory Balancing Account (NERBA)

The NERBA tracks costs meeting the following key criteria: (i) uncertainty as to the scope, magnitude and mechanics of compliance requirements associated with new, proposed, or evolving environmental rules or regulations; and (ii) potential for incurring significant incremental costs. Recognizing these inherent uncertainties, the TY 2012 GRC decision originally established the NERBA as a two-way balancing account¹²; however, the TY 2024

¹² D.13-05-010 at 1093.

1 GRC decision directed conversion to a one-way balancing account with an associated
2 memorandum account for above-authorized spending to be recovered through a reasonableness
3 review. SoCalGas requests \$16.301 million, an increase of \$1.614 million from 2025 adjusted-
4 recorded costs of \$14.687 million, and resumption of two-way balancing account treatment. The
5 NERBA is a non-shared service.

6 **1. Description of Costs and Underlying Activities/NERBA Changes and**
7 **Proposal**

8 The costs currently authorized to be recorded to the NERBA include: (a) AB 32
9 Administrative Fees; (b) Subpart W of Part 98 of Title 40 of the CFR; (c) LDAR Impact
10 Program and (d) Municipal Separate Stormwater Sewer Systems (MS4); related costs.¹³

11 SoCalGas proposes three changes to the existing NERBA one-way balancing account. First,
12 because SoCalGas can now reliably forecast costs related to the LDAR Impact Program and
13 Subpart W leak survey activities, it proposes transferring these costs from NERBA and including
14 them in base business costs within the operational business unit that performs the activities (Gas
15 Transmission Operations). Second, SoCalGas seeks authorization to restore two-way balancing
16 for AB 32 Administrative Fees, which would remain in the NERBA. Third, SoCalGas seeks
17 closure for the NERBA MS4 Subaccount because SoCalGas did not record costs in the last GRC
18 cycle and no forecast is included for the current cycle; therefore, balancing account treatment for
19 MS4 costs is not needed. This is consistent with the Commission's original intent for the
20 NERBA to track costs that are hard to predict. These proposals are described in more detail
21 below.

22 **a. Removal of Subpart W and LDAR related costs**

23 In this TY 2028 GRC, SoCalGas has removed Subpart W, LDAR, and MS4 related costs
24 from historical and forecast costs and proposes to remove these costs from NERBA treatment.
25 SoCalGas is familiar with the scope, magnitude, and mechanics of compliance requirements
26 associated with these programs and can reasonably predict the forecasted costs. Because
27 regulatory uncertainty has diminished, it is reasonable to conclude that the key criteria
28 established for the NERBA, as described herein, no longer apply to these programs.

¹³ Further description of the treatment of the NERBA and cost balances are discussed in the Regulatory Accounts testimony (Ex. SCG-21).

1 Accordingly, these costs are now included and described in Ex. SCG-05 Gas Transmission and
2 Storage testimony.

3 **i. Reauthorization of NERBA as two-way balancing**
4 **account for AB 32 Administrative Fees**

5 SoCalGas proposes that AB 32 Cost of Implementation (COI) fees billed to SoCalGas for
6 the development, administration, and implementation of AB 32 programs by state agencies to
7 achieve reductions in GHG emissions continue to be tracked in the NERBA. SoCalGas also
8 requests reauthorization of the NERBA as a two-way balancing account to protect ratepayers
9 from the cost of unnecessary reasonableness reviews.

10 AB 32 COI fees are calculated by CARB based on Greenhouse Gas (GHG) emissions
11 from natural gas suppliers in conjunction with the statewide Carbon Common Cost (CCC, \$/MT
12 CO₂e) that CARB sets annually. Since GHG emissions fluctuate annually due to variations in
13 natural gas supplied to customers (governed by market forces, weather conditions, economic
14 factors, and other variables), there is inherent uncertainty in the annual GHG
15 emissions. Furthermore, the CCC is not fixed, and CARB has the authority to change it
16 annually. The CCC has fluctuated considerably over the program's duration, ranging from
17 0.1213 in 2012 to 0.3459 in 2020. For example, the CCC was 0.2978 in 2018, dropped to 0.2683
18 in 2019, and rose to 0.3459 in 2020. This variability in both the CCC, which is set annually by
19 CARB, and GHG emissions, which vary annually, introduces significant uncertainty in the
20 annual AB32 COI fees billed by CARB.

21 Moreover, SoCalGas has no control over these fees, which are set entirely by, and passed
22 directly through to, CARB, and ratepayers derive no benefit from a burdensome and costly
23 reasonableness review process associated with one-way balancing treatment. In summary,
24 CARB calculates the annual fees, sends SoCalGas a bill detailing our annual fees, and thereafter,
25 SoCalGas pays the bill. SoCalGas does not have discretion to avoid paying the fee imposed by
26 CARB, and consequently any follow-up reasonableness review would result in a finding that the
27 fees paid were necessary and required by CARB. For these reasons, SoCalGas requests a two-
28 way balancing account for AB 32 COI fee costs. SoCalGas's proposed NERBA-related costs are
29 shown in Table AG-4.

TABLE AG-4
New Environmental Regulatory Balancing Account (NERBA)
Non-Shared O&M Costs (Balanced)

| In 2025 \$ (000s) | 2025 Adjusted-Recorded | TY 2028 Estimated | Change |
|---------------------------------|-------------------------------|--------------------------|---------------|
| AB32 Administrative Fees | 14,687 | 16,301 | 1,614 |
| Total Non-Shared O&M | 14,687 | 16,301 | 1,614 |

The regulatory accounting for NERBA, as proposed, is addressed in the Regulatory Accounts testimony (Ex. SCG-21).

2. Forecast Method

A four-year historical trend forecast method was developed for this cost category. This method is most appropriate because multiple years of data are available, and it captures the steady increase in cost of the fees over time—a trend that is expected to continue.

3. Cost Drivers

AB32 Administrative Fees are determined by CARB using a calculated annual CCC rate and SoCalGas’s total verified GHG emissions. SoCalGas pays annual administrative fees for the GHG emissions associated with the amount of natural gas delivered to end-users in California, excluding deliveries to electric generating facilities and wholesale providers. CARB determines the CCC based on projected program expenditures. The cost drivers for these administrative fees are the GHG emissions associated with the amount of natural gas delivered multiplied by the annual CCC.¹⁴ Because these costs are unknown until CARB issues its annual determination, AB 32 Administrative fees cannot be forecast precisely; neither the volume of gas to be delivered nor the CCC is known in advance.

E. Strategic Planning & Regulatory Policy

Strategic Planning & Regulatory Policy is responsible for a broad range of enterprise-level initiatives, including long-term business planning and goal setting, and qualitative and quantitative analysis to drive business-wide strategy, energy system scenario development, and integration of business objectives with regulatory policy development. Strategic Planning & Regulatory Policy also supports matters before the CPUC, such as general rate cases, cost of

¹⁴ For detailed calculations, see the workpapers accompanying this testimony (Ex. SCG-13-WP).

capital proceedings, and other applications and rulemakings. While Strategic Planning & Regulatory Policy’s focus evolves to reflect SoCalGas’s changing priorities, its core role remains centered on aligning business objectives with regulatory requirements and policy positions to continue supporting existing operations. Through this work, the team provides the enterprise with a clear view of key business priorities, supporting informed decision-making, regulatory deliverables, and outcomes that benefit employees and ratepayers.

**TABLE AG-5
Strategic Planning & Regulatory Policy
Non-Shared O&M Costs**

| In 2025\$ (000s) ¹⁵ | 2025 Adjusted- Recorded | TY 2028 Estimated | Change |
|--|-------------------------------|----------------------|------------|
| Strategic Planning & Regulatory Policy | 1,526 | 1,711 | 185 |
| Total Non-Shared O&M | 1,526 | 1,711 | 185 |

For TY 2028, Strategic Planning & Regulatory Policy requests \$1.711 million, an increase of \$185,000 from 2025 adjusted-recorded costs of \$1.526 million. Strategic Planning & Regulatory Policy is a non-shared service.

1. Description of Costs and Activities

Strategic Planning & Regulatory Policy incurs labor and non-labor costs to support SoCalGas’s company-wide initiatives that advance SoCalGas’s regulatory and strategic objectives. Strategic Planning & Regulatory Policy translates near and long-term priorities into clear, actionable roadmaps that promote operational efficiency and innovation, ultimately benefiting ratepayers. Through forward-looking analyses, Strategic Planning & Regulatory Policy helps prepare SoCalGas to anticipate risks and adapt to evolving market, business, and regulatory conditions and industry needs. By serving as a centralized enterprise planning function, Strategic Planning & Regulatory Policy is positioned to guide SoCalGas’s strategic direction in alignment with the company’s long-term goals and established regulatory policies.

The close integration of business strategy and regulatory frameworks allows SoCalGas to adapt to the evolving external business and regulatory environment while advancing safe, reliable, and affordable service. Strategic Planning & Regulatory Policy provides input on ongoing and upcoming initiatives and key regulatory filings to align policy positions with

¹⁵ Totals may include rounding differences.

1 SoCalGas’s long-term vision. For example, in the 2025 base year, Strategic Planning &
2 Regulatory Policy collaborated with multiple cross-functional teams to provide guidance and
3 input on the TY 2026 Cost of Capital proceeding, TY 2028 GRC, Gas Planning Order Instituting
4 Rulemaking (OIR), Climate Adaptation Vulnerability Assessment (CAVA), among other
5 matters. This support included drafting and reviewing various regulatory filings and documents
6 (e.g., applications, testimony, proposed decisions, etc.), identifying potential implications and
7 risk mitigation opportunities, conducting research and analyses, and collaborating with internal
8 stakeholders. The work is performed in coordination with cross-functional departments,
9 including Regulatory Affairs, Legal Operations, Environmental, Accounting & Finance, and
10 other subject matter experts as needed. In some instances, Strategic Planning & Regulatory
11 Policy’s work requires specialized capabilities not available internally. In such cases, SoCalGas
12 may engage external subject matter experts or skilled labor, such as for Commission ordered
13 studies (e.g., the independent Efficiency Study ordered in the TY 2024 GRC decision (D.24-12-
14 074)).

15 **2. Forecast Method**

16 A base year forecast method was used with an incremental increase of approximately
17 \$185,000 in labor costs and no increase in non-labor costs. The base year costs reflect an
18 adjustment to transfer 0.3 FTE from shared O&M to non-shared O&M, from the Senior Director
19 of Strategic Planning & Regulatory Policy’s (Senior Director) cost center to the Strategic
20 Planning & Regulatory Policy cost center. The base year was also adjusted to remove costs
21 associated with subscriptions and membership dues that are not requested in TY 2028. While the
22 work of Strategic Planning & Regulatory Policy evolves in response to changing business,
23 regulatory, and policy environments, the scope of work for TY 2028 is expected to closely align
24 with the adjusted 2025 base year.

25 **3. Cost Drivers**

26 The requested increase of \$185,000 in labor costs from the 2025 adjusted base year to TY
27 2028 reflects the reallocation of 0.90 FTEs from previously non-GRC funded activities to base
28 business functions, including regulatory, policy, and planning activities. In addition, an
29 adjustment of \$66,000 reflects changes in connection with the compensation modernization
30 initiative. Please refer to the Compensation and Benefits testimony, Ex. SCG-16/SDGE-20.
31 Efficient use of these labor resources support core area responsibilities, and as needed facilitates

1 the use of external subject-matter experts or specialized labor to meet area objectives. SoCalGas
 2 is not requesting an increase in non-labor from the 2025 adjusted base year.

3 **IV. SHARED O&M COSTS**

4 As described in Exhibit Shared Services testimony (Ex. SCG-22/SDGE-27), Shared
 5 Services are activities performed by a utility shared services department (i.e., functional area) for
 6 the benefit of: (i) SDG&E or SoCalGas, (ii) Sempra Energy Corporate Center, and/or (iii) any
 7 affiliate subsidiaries. The utility providing Shared Services allocates and bills incurred costs to
 8 the entity or entities receiving those services.

9 Table AG-6 summarizes the total shared O&M forecasts for the listed cost categories.

10 **TABLE AG-6**
 11 **Environmental Services & Strategic Planning & Regulatory Policy**
 12 **Shared O&M Costs**

| In 2025\$ (000s) ¹⁶ | 2025 Adjusted-Recorded | Estimated TY 2028 | Change |
|---|------------------------|-------------------|------------|
| Shared Environmental Compliance | 1,363 | 1,443 | 80 |
| Shared Strategy & Financial Planning Leadership | 637 | 752 | 115 |
| Total Shared Services O&M | 2,000 | 2,195 | 195 |

13 These forecasts are based on a total incurred basis. The shared services allocation
 14 percentages are presented in the Environmental Services shared services workpapers (Ex. SCG-
 15 13-WP) and include a description of the activities being allocated. The dollar amounts allocated
 16 to affiliates are described in Ex. SCG-22/SDGE-27, Shared Services testimony.

17 **A. Environmental Compliance**

18 **TABLE AG-7**
 19 **Environmental Compliance**
 20 **Shared O&M Summary of Costs**

| In 2025 \$ (000s) ¹⁷ | 2025 Adjusted-Recorded | TY 2028 Estimated | Change |
|--------------------------------------|------------------------|-------------------|-----------|
| Environmental Air | 546 | 310 | (236) |
| Air SME | 359 | 414 | 55 |
| Field Environmental Services | 458 | 719 | 261 |
| Total Shared Services O&M | 1,363 | 1,443 | 80 |

¹⁶ Totals may include rounding differences.

¹⁷ Totals may include rounding differences.

1 **1. Description of Costs and Activities**

2 Air Quality Support within Environmental Services provides internal support for
3 compliance with rules and regulations relating to air quality and greenhouse gas emissions. The
4 shared services allocation is primarily driven by support required for the Moreno Compressor
5 Station, operated in Riverside County area, which is an SDG&E facility. With respect to air
6 quality matters, Air Quality Support is comprised of subject matter experts who provide support
7 in complying with rules from nine Air Pollution Control Districts (APCDs) within SoCalGas and
8 SDG&E’s service territory. The group also provides subject matter expertise and support to staff
9 within Field Environmental Services, supporting over 50 locations within the service territory
10 with existing APCD permits on an as-needed basis.

11 **2. Forecast Method**

12 A base year forecasting methodology was used to forecast labor and non-labor costs for
13 this cost category. This method is most appropriate because the base year is representative of the
14 cost expectations for TY 2028 and, therefore, the most recent expenses were used as a basis for
15 the forecast. Additionally, any upward cost pressures during the TY 2028 GRC forecast period
16 are expected to be driven by proposed new environmental regulatory and program-related
17 requirements.

18 **3. Cost Drivers**

19 The primary cost drivers for these activities are employee labor charges and non-labor
20 charges related to continued air quality reporting and compliance responsibilities for each of
21 SoCalGas’s storage fields and transmissions compressor stations and for permit compliance and
22 consulting support. The total net increase for estimated TY 2028 costs for Environmental
23 Compliance activities is approximately \$80,000. This reflects decreases in costs due to reduced
24 workforce (1.1 FTEs) that is offset by increases in costs due to reallocated existing FTEs into
25 these cost centers (1.7 FTEs).

1 **B. Strategy and Financial Planning Leadership**

2 **TABLE AG-8**
3 **Strategy & Financial Planning Leadership**
4 **Shared O&M Summary of Costs**

| In 2025\$ (000s) ¹⁸ | 2025 Adjusted-Recorded | Estimated TY 2028 | Change |
|---|------------------------|-------------------|------------|
| Senior Vice President of Strategy, Financial Planning and Treasurer ¹⁹ | 520 | 480 | (40) |
| Senior Director of Strategic Planning & Regulatory Policy | 117 | 272 | 155 |
| Total Shared Services O&M | 637 | 752 | 115 |

5 For TY 2028, the Strategy and Financial Planning Leadership, or Leadership (Senior
6 Vice President of Strategy, Financial Planning and Treasurer (Senior VP) and Senior Director of
7 Strategic Planning (Senior Director) requests \$752,000, an increase of \$115,000 from 2025
8 adjusted-recorded costs of \$637,000. Strategy and Financial Planning Leadership is a shared
9 service.

10 **4. Description of Costs and Activities**

11 The Senior Director of Strategic Planning (Senior Director) oversees, leads, and directly
12 manages Strategic Planning & Regulatory Policy for SoCalGas, Strategic Planning for SDG&E,
13 as well as SoCalGas’s, Market Development and Energy and Environmental Policy activities.²⁰
14 In this capacity, the Senior Director is responsible for development and implementation of
15 SoCalGas’s and SDG&E’s key initiatives, including long-term business strategy and goal
16 setting, qualitative and quantitative analysis, long-term energy system scenario planning, and
17 connecting business strategy with regulatory policy. The Senior Director is also responsible for
18 maintaining adequate supervision and staffing to bring alignment to the companies’ business and
19 regulatory strategies and other external policy drivers. The position is directly involved in
20 implementing strategic directives, goals, and initiatives from senior leadership within the

¹⁸ Totals may include rounding differences.

¹⁹ Cost center 2200-0261.001 in Ex. SCG-13-WP (pp. 48–62) is incorrectly titled as “SVP–Strategy and Sustainability” and should read “SVP–Strategy, Financial Planning and Treasurer.”

²⁰ The SoCalGas Market Development and Energy and Environmental Policy activities forecast and historical costs are sponsored in Ex. SCG-03 (Gas Engineering & System Integrity (GESI) testimony).

1 respective organizations and through collaboration with other SoCalGas and SDG&E
2 departments.

3 The Senior VP is responsible for overseeing the Senior Director's activities described
4 above and for leadership of the Financial & Operational Planning and Gas Acquisition, including
5 the Financial Planning, Business Planning & Budgets, Capital Operational Planning, and Gas
6 Acquisition. The activities, historical and forecasted costs of these groups are sponsored in Ex.
7 SCG-19 Administrative and General testimony, SCG-07 Gas Acquisition testimony, and Ex.
8 SDGE-23 Administrative and General testimony. The Senior VP is responsible for leading the
9 development of the one-year and five-year financial plan, cash management and treasury
10 activities, budget development, procurement of natural gas and Renewable Natural Gas (RNG)
11 for retail core customers, procurement of Cap-and-Invest GHG emissions compliance
12 instruments, and compliance with state and federal regulatory requirements and policies.

13 **5. Forecast Method**

14 The cost forecast used for Strategy and Financial Planning Leadership is a base year
15 forecast methodology. As shown in Table AG-8 above, SoCalGas recorded \$637,000 for these
16 activities in the base year 2025. The Strategy and Financial Planning Leadership roles have
17 assumed additional responsibility, including leading functions across SoCalGas and SDG&E
18 (moving from non-shared service to shared service). The base year labor costs were reduced to
19 transfer 0.3 FTEs from the Senior Director's cost center to the Strategic Planning & Regulatory
20 Policy cost center because this FTE will not be a shared service. The base year was also adjusted
21 to remove non-labor costs associated with subscriptions and membership dues that are not
22 requested in TY 2028. This method is most appropriate because the base year is representative
23 of the expectations for TY 2028 and, therefore, the most recent costs were used as a basis for the
24 forecast.

25 **6. Cost Drivers**

26 The costs for Strategy and Financial Planning Leadership are primarily labor driven. The
27 increase of \$115,000 in labor costs from the 2025 base year to the 2028 test year request is
28 primarily to reallocate 0.4 FTE of the Senior Director's labor from previously being partially
29 allocated to non-GRC activities to be fully allocated to GRC base business to focus on the role's
30 expanded responsibilities, including leadership of SDG&E Strategic Planning. This labor
31 increase is offset by a decrease of 0.3 FTE in the Senior VP's cost center due to a reduction in

1 the amount of administrative support labor, resulting in a net increase of 0.1 FTE's for the
2 Strategy and Financial Planning Leadership area. In addition, an adjustment of \$30,000 reflects
3 changes in connection with the compensation modernization initiative. Please refer to the
4 Compensation and Benefits testimony, Ex. SCG-16/SDGE-20. SoCalGas's 2028 test year non-
5 labor costs are expected to be in-line with the 2025 base year. These costs are primarily used to
6 leverage skills of external subject matter experts or skilled labor to meet the goals and advance
7 strategic initiatives, as needed.

8 **V. CONCLUSION**

9 This testimony and workpapers provide support for the costs sponsored for the
10 Environmental and Sustainability and Strategic Planning & Regulatory Policy organizations and
11 the reasonableness of the methodologies used to derive those costs. The test year forecasts
12 represent an increase over base year costs due to increased workload in addition to new
13 compliance requirements and initiatives. I respectfully request the Commission fully fund this
14 work so SoCalGas can continue to meet its obligations to adhere to applicable rules and
15 regulations.

16 This concludes my prepared direct testimony.

1 **VI. WITNESS QUALIFICATIONS**

2 My name is Albert J. Garcia. My business address is 555 West Fifth Street, Los Angeles,
3 California, 90013. My current position is Director of Environmental Services. The
4 Environmental Services organization provides environmental compliance services and support to
5 SoCalGas. I joined SoCalGas in 2010 as a Senior Environmental Counsel. I have been in my
6 current position since 2019.

7 I hold a Bachelor of Art Degree in Political Science from California State University,
8 Fullerton and Juris Doctorate from Columbia University School of Law.

9 I have previously testified before the Commission.

APPENDIX A
GLOSSARY OF TERMS

APPENDIX A

Glossary of Terms

| ACRONYM | DEFINITION |
|---------|--|
| APCD | Air Pollution Control District |
| AB | Assembly Bill |
| BY | Base Year |
| CalARP | California Accidental Release Prevention |
| CARB | California Air Resources Board |
| CESA | California Endangered Species Act |
| CPUC | California Public Utilities Commission |
| CAVA | Climate Adaptation and Vulnerability Assessment |
| CUPA | Certified Unified Program Agency |
| CCC | Common Carbon Cost |
| CEQA | California Environmental Quality Act |
| CNRA | California Natural Resources Agency |
| COI | Cost of Implementation |
| DTSC | Department of Toxic Substances Control |
| EPA | Environmental Protection Agency |
| ESG | Environmental, Social, Governance |
| ESCMP | Environmental and Safety Compliance Management Program |
| FTE | Full-Time Equivalent |
| GIR | Generator Improvements Rule |
| GRC | General Rate Case |
| GHG | Greenhouse Gas |
| KPI | Key Performance Indicator |
| LDAR | Leak Detection and Repair |
| MSA | Master Service Agreement |
| NEPA | National Environmental Policy Act |
| NERBA | New Environmental Regulatory Balancing Account |
| OIR | Order Instituting Rulemaking |
| O&M | Operations and Maintenance |
| RAMP | Risk Assessment and Mitigation Phase |
| RNG | Renewable natural Gas |
| SME | Subject Matter Expert |
| TY | Test Year |
| TSDF | Treatment, Storage, and Disposal Facilities |
| UST | Underground Storage Tank |