

Application: A.25-07-XXX
Exhibit No.: SCG-03
Witness: Rae Marie Yu, Maria E. Becerra, Julia L.Cortez
Chapter: 3

Application of Southern California Gas
Company (U904G), on Behalf of its
Customers, for Approval of Gas Line
Extension Allowances.

Application 26-07-XXX
(Filed July 1, 2026)

DIRECT TESTIMONY OF
RAE MARIE YU, MARIA E. BECERRA, AND JULIA L. CORTEZ
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY
(CHAPTER 3 – REGULATORY ACCOUNTING, COST RECOVERY,
REVENUE REQUIREMENT, AND RATES)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

July 1, 2026

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1 **DIRECT TESTIMONY OF**
2 **RAE MARIE YU, MARIA E. BECERRA, AND JULIA L. CORTEZ**

3 **CHAPTER 3 - REGULATORY ACCOUNTING, COST RECOVERY, REVENUE**
4 **REQUIREMENT, AND RATES**

5 **I. PURPOSE AND OVERVIEW**

6 The purpose of our joint testimony is to support the Application of Southern California
7 Gas Company (SoCalGas), on Behalf of its Customers, for Approval of Gas Line Extension
8 Allowances (Application) pursuant to Decision (D.) 22-09-026 of the California Public Utilities
9 Commission (Commission). The testimony presents SoCalGas's cost recovery proposal related
10 to: (1) the establishment, if necessary, and use of the Gas Line Extension Allowance Balancing
11 Account (GLEABA) to record and recover the incremental revenue requirement associated with
12 Commission approved gas line extension allowances; (2) the illustrative revenue requirement
13 associated with the estimated capital expenditures for the seven projects eligible for gas line
14 extension allowances; (3) the proposed cost allocation methodology; and (4) natural gas rate and
15 customer bill impacts.

16 **II. REGULATORY ACCOUNTING AND COST RECOVERY (WITNESS: RAE**
17 **MARIE YU)**

18 In application (A.) 25-07-001, SoCalGas proposed establishing the GLEABA to recover
19 the revenue requirement associated with any line extension allowances approved in that
20 application.¹ If the Commission does not approve the GLEABA in A.25-07-001, SoCalGas
21 proposes in this Application to establish the account. The GLEABA will be an interest-bearing
22 two-way balancing account to be recorded on SoCalGas's financial statements. The purpose of
23 the GLEABA is to record the incremental revenue requirement associated with any gas line
24 extension allowances that the Commission approves through this Application. Revenue
25 requirement will be recorded to the GLEABA once the allowance is paid to the customer. Details
26 of the non-residential projects and estimated allowances are described in the direct testimony of

¹ The proposed balancing account, GLEABA, is different and separate from SoCalGas's existing Gas Line Extension Balancing Account (GLEBA) authorized in D.24-12-074. SoCalGas is requesting closure of the GLEBA in SoCalGas's Test Year 2028 General Rate Case (GRC). Refer to A.26-06-014, Prepared Direct Testimony of Rae Marie Yu (Regulatory Accounts, Exhibit (Ex.) SCG-21).

1 Jennifer Morris (Chapter 1) and Jason Legner (Chapter 2). The estimated illustrative annual
2 revenue requirement associated with the allowances is described in Section III.

3 SoCalGas proposes to amortize the actual balance in the GLEABA in customers' gas
4 transportation rates in connection with the annual regulatory account update advice letter filing.
5 The ongoing incremental capital revenue requirement will be tracked in and recovered annually
6 through the GLEABA until the capital assets are included in SoCalGas's future GRC.

7 **III. ILLUSTRATIVE REVENUE REQUIREMENT (WITNESS: MARIA E.**
8 **BECERRA)**

9 As described in the direct testimony of Jennifer Morris (Chapter 1), the Application
10 consists of seven projects, submitted on behalf of customers, seeking gas line extension
11 allowances pursuant to D.22-09-026. The estimated gas line extension allowances for these
12 seven projects total approximately \$5.292 million.²

13 The revenue requirement accounts for the incremental fully-loaded capital expenditures
14 for these seven projects up to the estimated gas line extension allowance for each project. In
15 addition to the incremental fully-loaded capital expenditures, the revenue requirement also
16 includes other costs required to support the investment, including payment of income taxes,
17 property taxes, and franchise fees & uncollectibles (FF&U).³ The revenue requirement also
18 provides for recovery of the investment through depreciation over the assets' useful lives, as well
19 as an authorized return on the investment.⁴

20 The total illustrative revenue requirement associated with the seven projects is \$11.9
21 million over the useful lives of the assets. Table 1 begins with 2032, the year in which the
22 revenue requirement reaches its projected peak, and shows the decline over the following three
23 years for illustrative purposes. This downward trend continues through the remaining useful lives
24 of the assets.

² Allowance values are rounded to the nearest thousandth. Allowance values are estimates and are subject to change based on actual demonstrated usage.

³ Current applicable income tax rates are 21.00% and 8.84% for federal and state taxes, respectively, and 2.153% for FF&U. FF&U multipliers are calculated based on the mechanism approved in D.24-12-074.

⁴ The authorized rate of return is 7.52%, as approved in D.25-12-043, and is applied to rate base to calculate the return on investment.

Table 1

**Illustrative Revenue Requirement (In Thousands)
(2032 Peak Year and Three Subsequent Years)**

	2032	2033	2034	2035
Revenue Requirement	\$722.0	\$721.7	\$698.8	\$676.4

Following the three-year true-up period for each approved project and once the allowance is paid to the customer, as described in the direct testimony of Jennifer Morris (Chapter 1), SoCalGas will record the actual revenue requirement in GLEABA for recovery in rates. Further details of the recovery treatment of the actual revenue requirement are discussed above in Section II.

SoCalGas uses the forecasted revenue requirement for purposes of illustrating the potential rate impact of these seven projects. The illustrative rate impacts are discussed below in Section V.

IV. COST ALLOCATION METHODOLOGY (WITNESS: JULIA L. CORTEZ)

In this Application, SoCalGas proposes to use the Equal Percentage of Authorized Margin (EPAM) cost allocation methodology to recover the revenue requirement recorded in the GLEABA, consistent with the methodology proposed in A.25-07-001. Under EPAM, the incremental revenue requirement is allocated across customer classes based on each class's share of authorized margin. For illustrative purposes, SoCalGas determines the rate impacts by adding the incremental volumes associated with the customers presented in this Application to the volumes adopted in the most recently implemented Cost Allocation Proceeding (CAP) decision.⁵ Because rates are calculated on a per-therm basis, the inclusion of additional volumes places downward pressure on rates. The actual cost allocation methodology applied at the time of recovery will be determined by the CAP decision then in effect.

⁵ D.24-07-009.

1 **V. ILLUSTRATIVE RATE AND BILL IMPACTS (WITNESS: JULIA L. CORTEZ)**

2 Table 2 below illustrates current and proposed gas transportation rates by major customer
3 class upon recovery of costs associated with GLEABA. These illustrative rates are derived from
4 the forecasted revenue requirement provided in Section III, Table 1, which reflects the
5 incremental revenue requirement to be included in rates from 2032 through 2035. As shown in
6 Table 2, rates are presented for 2032, the projected peak year, and for the subsequent years 2033
7 through 2035 to demonstrate that rates decline for all customer classes as the revenue
8 requirement decreases. Beginning in 2035, class-average residential rates are forecasted to fall
9 below current rates, producing an overall benefit that continues for the remaining life of the
10 assets.

11 Over a 12-month amortization period, a typical residential customer using 35 therms per
12 month would see a minimal bill impact of approximately 0.04 cents per month in 2032, the peak
13 revenue year. This is equivalent to less than half a cent per year for the typical residential
14 customer. By 2035, bills are forecasted to decline slightly, with the benefits growing in
15 subsequent years.

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Table 2
Illustrative Transportation Rates⁶

Transportation			Current Rates	Peak Year 2032	Increase (decrease)	% change	2033	Increase (decrease)	% change	2034	Increase (decrease)	% change	2035	Increase (decrease)	% change
<u>SoCalGas Summary</u>															
<u>Core Rates</u>															
Residential	\$/therm		\$1.434	\$1.434	\$0.000	0.0%	\$1.434	(\$0.000)	0.0%	\$1.434	(\$0.000)	0.0%	\$1.434	(\$0.000)	0.0%
Core Commercial & Industrial (C&I)	\$/therm		\$0.905	\$0.904	(\$0.000)	0.0%	\$0.904	(\$0.000)	0.0%	\$0.904	(\$0.000)	0.0%	\$0.904	(\$0.000)	0.0%
Natural Gas Vehicle (NGV)	\$/therm		\$0.380	\$0.374	(\$0.006)	-1.5%	\$0.374	(\$0.000)	0.0%	\$0.374	(\$0.000)	0.0%	\$0.374	(\$0.000)	0.0%
<u>NonCore Distribution Level Service Rates</u>															
NonCore C&I Distribution Tier 1*	\$/therm		\$0.616	\$0.615	(\$0.000)	0.0%	\$0.615	(\$0.000)	0.0%	\$0.615	(\$0.000)	0.0%	\$0.615	(\$0.000)	0.0%
NonCore C&I Distribution Tier 2*	\$/therm		\$0.432	\$0.432	(\$0.000)	0.0%	\$0.432	(\$0.000)	0.0%	\$0.432	(\$0.000)	0.0%	\$0.432	(\$0.000)	0.0%
NonCore C&I Distribution Tier 3*	\$/therm		\$0.314	\$0.314	(\$0.000)	-0.1%	\$0.314	(\$0.000)	0.0%	\$0.314	(\$0.000)	0.0%	\$0.314	(\$0.000)	0.0%
NonCore C&I Distribution Tier 4*	\$/therm		\$0.230	\$0.230	(\$0.000)	-0.1%	\$0.230	(\$0.000)	0.0%	\$0.230	(\$0.000)	0.0%	\$0.230	(\$0.000)	0.0%
NCCI-D Class Average	\$/therm		\$0.279	\$0.279	(\$0.000)	0.0%	\$0.279	(\$0.000)	0.0%	\$0.279	(\$0.000)	0.0%	\$0.279	(\$0.000)	0.0%
Electric Generation Distribution Tier 1*	\$/therm		\$0.421	\$0.420	(\$0.001)	-0.2%	\$0.420	(\$0.000)	0.0%	\$0.420	(\$0.000)	0.0%	\$0.420	(\$0.000)	0.0%
Electric Generation Distribution Tier 2*	\$/therm		\$0.297	\$0.297	(\$0.000)	-0.1%	\$0.297	(\$0.000)	0.0%	\$0.297	(\$0.000)	0.0%	\$0.297	(\$0.000)	0.0%
EG-D Class Average	\$/therm		\$0.272	\$0.272	(\$0.000)	-0.1%	\$0.272	(\$0.000)	0.0%	\$0.272	(\$0.000)	0.0%	\$0.272	(\$0.000)	0.0%
<u>NonCore Transmission Level Service (TLS) Rates</u>															
TLS-C&I Class Average Rate [^]	\$/therm		\$0.197	\$0.197	(\$0.000)	-0.1%	\$0.197	(\$0.000)	0.0%	\$0.197	(\$0.000)	0.0%	\$0.197	(\$0.000)	0.0%
TLS-Electric Generation Class Average Rate*	\$/therm		\$0.197	\$0.197	(\$0.000)	-0.1%	\$0.197	(\$0.000)	0.0%	\$0.197	(\$0.000)	0.0%	\$0.197	(\$0.000)	0.0%
Backbone Transmission Service (BTS)	\$/dth/day		\$0.896	\$0.896	\$0.000	0.0%	\$0.896	\$0.000	0.0%	\$0.896	\$0.000	0.0%	\$0.896	\$0.000	0.0%
System Average Rate w/BTS	\$/therm		\$0.651	\$0.651	(\$0.000)	-0.1%	\$0.651	(\$0.000)	0.0%	\$0.651	(\$0.000)	0.0%	\$0.651	(\$0.000)	0.0%
Rates Revenue Requirement w/BTS	\$ millions		\$5,412	\$5,413	\$1	0.0%	\$5,413	\$0	0.0%	\$5,413	(\$0)	0.0%	\$5,413	(\$0)	0.0%

^{*} w/California Air Resources Board (CARB), Greenhouse Gas (GHG) adders
[^] w/California Solar Initiative Thermal Program Memo Account (CSITMA), CARB and GHG adders

This concludes our joint direct testimony.

⁶ Rates for 2032 are compared to current rates, while rates for 2033 through 2035 are presented on a year-over year basis to show the decline.

1 **VI. QUALIFICATIONS**

2 **A. Rae Marie Yu**

3 My name is Rae Marie Yu. I am employed by SoCalGas. My business address is 555
4 West Fifth Street, Los Angeles, California, 90013-1011. I am the Financial Reporting Manager
5 in the Regulatory Accounts group within the Accounting and Finance Department. I am
6 responsible for managing SoCalGas' authorized regulatory balancing, tracking, and
7 memorandum accounts. My responsibilities include implementing regulatory accounting
8 procedures to comply with Commission directives; quantifying and recording monthly entries
9 and adjustments for Commission-authorized regulatory account mechanisms; and managing the
10 general administration of SoCalGas' authorized regulatory accounts. Before this role, I held
11 various positions within the Accounting and Finance Department. I received my Bachelor of
12 Science degree in Accounting from San Diego State University in 2007. I am also a Certified
13 Public Accountant (CPA). I began my employment with SoCalGas in 2007 in the Accounting
14 and Finance Department where I have held various positions of increasing responsibility in
15 accounts payable, plant accounting, business controls, regulatory accounts, fixed assets, and
16 operational planning before assuming my current position.

17 I have previously testified before the Commission.

18 **B. Maria E. Becerra**

19 My name is Maria E. Becerra. My business address is 555 West Fifth Street, Los
20 Angeles, California, 90013-1011. I am currently employed by SoCalGas as the Financial and
21 Strategic Manager within the Accounting and Finance Department. I am responsible for
22 managing the financial analysis of various SoCalGas projects and developing the associated
23 revenue requirement forecasts for these projects.

24 I joined SoCalGas in 1994. Prior to SoCalGas, I worked as an auditor for
25 PricewaterhouseCoopers from 1990 to 1994. I hold a Bachelor of Science degree in Accounting
26 from Loyola Marymount University. I am a CPA.

27 I have previously prepared and submitted testimony for consideration in a proceeding
28 before this Commission.

1 **C. Julia L. Cortez**

2 My name is Julia L. Cortez. My business address is 555 West Fifth Street, Los Angeles,
3 California, 90013-1011. I received a Bachelor of Science degree in Business Administration
4 with an emphasis in Human Resources from Cal Poly Pomona, California in 2007. I received a
5 Master of Business Administration degree from the University of La Verne, California in 2013.
6 As the Rates Lead, I support the gas transportation rates for both SoCalGas and San Diego Gas
7 & Electric Company. This includes allocating authorized revenue requirements to customer rate
8 classes, developing rate design for each class, calculating customer rate changes and computing
9 customers' bill impacts. In my previous role as a Market Advisor, I was responsible for policy
10 and rate analysis for commercial, industrial and energy markets. This included developing
11 guidelines for customers in a competitive bypass situation, cost/benefit analysis and supporting
12 regulatory proceeding through advice letter filings.

13 I have previously prepared and submitted testimony for consideration in a proceeding
14 before this Commission.
15

1 **VII. CERTIFICATION**

2 We prepared, or caused to be prepared under our supervision, this joint testimony. We
3 each sponsor the portions of this joint testimony for which we are responsible. The facts stated
4 in the portions of this joint testimony that each of us sponsors are true and correct to the best of
5 that witness's knowledge and belief as of the date set forth below. To the extent any such
6 portions reflect opinions or judgments, they reflect the best professional judgment of the
7 sponsoring witness as of that date.

8 We declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on July 1, 2026 in Los Angeles, California.

11 */S/ Rae Marie Yu*

12 _____
13 Rae Marie Yu

14 */S/ Maria E. Becerra*

15 _____
16 Maria E. Becerra

17 */S/ Julia L. Cortez*

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19 Julia L. Cortez