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DATED: MARCH 6, 2026
SOCALGAS RESPONSE DATED: MARCH 20, 2026

The following questions refer to Chapter 1 Prepared Testimony:

Question 1.:

In Table MMD-2, SCG and SDG&E rely on the 2024 CGR to forecast a core peak day (1-in-35) demand of 2,983 MMcfd. Please provide the actual highest recorded core peak day demand (in MMcfd) for each of the last five winter seasons to demonstrate how historical actuals compare to this nearly 3 Bcf/d forecast.

Response 1.

Note that there are corrections to Table MMD-2 headings in columns E and F. Also, column D is corrected to 2822 MMcfd to represent SCG and SDG&E core demand, which results in a change to column F.

Table MMD-2: Proposed Core Storage Allocations Per Reasoning

A	B	C	D	E	F
Total Inventory Bcf	Average Year Demand MMcfd	Cold Year Winter 1- in - 35	Peak Day 1-in-35	Winter Flowing Supply MMcfd (B*100% - 120%)	Storage and Additional Flowing Supply Needed for Peak Day MMcfd
		Demand MMcfd	Demand MMcfd		(D-E)
76	949	1381	2822	949 to 1139	1683 to 1873

The following is the actual highest recorded core demand for each of the last five winters.

Winter (Nov-Mar)	Highest Recorded SCG core demand (MMCFD)	Highest Recorded SDG&E core demand (MMCFD)
2020-2021	2,094	289
2021-2022	2,187	282
2022-2023	2,058	278
2023-2024	1,912	271
2024-2025	1,914	244

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Question 2.

To justify reserving 1,500 MMcfd of winter withdrawal capacity for the core, the testimony states this capacity is needed to bridge the gap between peak day demand and flowing supply. What was the **actual** maximum core storage withdrawal (in MMcfd) recorded on a single day during the last five winter seasons, and how does that actual peak withdrawal compare to the requested 1,500 MMcfd allocation?

Response 2.

Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66, and D.21-09-020 - See CONFIDENTIAL – PubAdv-SCG_SDGE-014_Q2.pdf.

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Question 3.

The 2024 California Gas Report (CGR) projects an average year demand for the core of 949 MMcfd. Please provide the **actual recorded** average daily core demand for the most recent full calendar years (e.g., 2023, 2024, and 2025) to confirm whether actual core demand is already tracking below this forecasted baseline?

Response 3.

The following table is the actual recorded average daily core demand of SCG and SDG&E.

Year	Daily Average of SCG core demand (MMCFD)	Daily Average of SDG&E core demand (MMCFD)
2023	956	141
2024	912	133
2025	869	136

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Question 4.

SCG and SDG&E use a cold year winter (1-in-35) demand forecast of 1,381 MMcfd to justify allocating 76 Bcf of storage inventory to the core. What has been the **actual recorded** average winter daily core demand over the past five winter seasons, and what is the variance between those recorded actuals and the 1,381 MMcfd forecast?

Response 4.

The following is the actual recorded average winter daily core demand for each of the last five winter seasons.

Winter (Nov-Mar)	Average Recorded SCG core demand (MMCFD)	Average Recorded SDG&E core demand (MMCFD)	Difference (between actuals and 1,381 MMcfd)
2020-2021	1,273	185	77
2021-2022	1,230	175	24
2022-2023	1,430	200	249
2023-2024	1,174	167	-40
2024-2025	1,197	176	-8

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Question 5.

To determine the core's storage requirement, SCG and SDG&E calculate winter flowing supply as being strictly between 949 MMcfd and 1,139 MMcfd, which represents 100% to 120% of the forecasted average year demand. Please provide the **actual highest** recorded daily flowing pipeline supplies utilized by the core during peak winter events over the last five years.

Response 5.

There is not a requirement for core winter flowing supply to be strictly between 949 MMcfd and 1139 MMcfd. The 949 MMcfd and 1139 MMcfd are derived from planning criteria and guidance provided by the Commission. These numbers represent the core firm interstate pipeline commitments at an annual average of between 100% and 120% of the average temperature year demand. Please see Chapter 1, MMD-5, lines 15-22 and MMD-6, lines 12-14. During the last five winter seasons, the highest core daily flowing pipeline supplies were 2736 MMcfd.

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Question 6.

Has actual historical winter flowing supply for the core ever exceeded the forecasted 1,139 MMcfd maximum ceiling? If actual flowing supplies reliably exceed this calculated maximum, wouldn't the core require less than the proposed 76 Bcf of storage inventory and 1,500 MMcfd of withdrawal?

Response 6.

There is not a maximum ceiling for core winter flowing supply of 1139 MMcfd, see Response 5. Actual historical winter flowing supply for the core has exceeded 1139 MMcfd. see Response 5.

See Chapter 1 MMD-6, lines 10-14 and MMD-7, lines 1-5 for an explanation as to how the proposed 76 Bcf of storage inventory and the 1500 MMcfd of withdrawal capacity will assist the core in meeting cold year and peak day demand.

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Question 7.

Given the rapid implementation of state decarbonization and electrification policies, what specific mechanisms exist to adjust the proposed core storage allocation of **76 Bcf** if actual core demand drops significantly faster during the 2027–2029 period than was forecasted in the 2024 CGR?

Response 7.

No mechanisms currently exist.

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Question 8.

The 2024 CGR projects a 1-in-35 peak day core demand of **2983 MMcfd** for the 2027–2029 period. How sensitive is this peak day projection to the specific "Additional Achievable Fuel Substitution" or energy efficiency scenarios modeled by the California Energy Commission, and what margin of error is assumed in this 2024 forecast?

Response 8.

Note that there are corrections to Table MMD-2 headings in columns E and F. Also column D is corrected to 2822 MMcfd to represent SCG and SDG&E core demand, which results in a change to column F.

Table MMD-2: Proposed Core Storage Allocations Per Reasoning

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76	949	1381	2822	949 to 1139	1683 to 1873

SoCalGas has not conducted an analysis of its peak day forecasts sensitivity to the California Energy Commission's (CEC) fuel substitution or energy efficiency forecasts. SoCalGas did not use the CEC's Additional Achievable Energy Efficiency (AAEE) as an input for its 2024 California Gas Report (CGR) forecasts. The AAFS was used as an input to generate the annual core demand forecasts. The core peak day demand is calculated using the 1-in-35-year peak day temperature condition as well as the average daily December demand for each market segment. See page 363 of the 2024 CGR SoCalGas workpaper and page 334 of the 2024 CGR SDG&E workpaper.

https://www.socalgas.com/sites/default/files/2024-08/2024-CGR-Workpapers-SoCalGas.pdf

https://www.sdge.com/sites/default/files/regulatory/sdge%20final.pdf

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Question 9.

SCG and SDG&E propose using the 2024 CGR to justify withholding capacity from the Unbundled Storage (UBS) market to prioritize the core. How do SCG and SDG&E ensure that the 2024 CGR does not systematically overestimate core reliability needs at the direct expense of non-core operational flexibility?

Response 9.

Applicants object to the extent the question misstates testimony and/or asserts facts not in evidence by claiming Applicants' are "withholding capacity from the [UBS] market." Subject to and without waiving the foregoing, Applicants respond as follows: consistent with longstanding Commission policy and prior cost allocation proceedings, the focus for the storage allocation proposal is on meeting core reliability, with any remaining capacity after meeting core reliability needs allocated to the balancing and UBS programs.

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Question 10.

The calculation for required peak day storage and additional flowing supply (**1844 to 2034 MMcfd**) relies on deducting winter flowing supply (capped at 120% of average year demand) from the Peak Day demand. Does the 2024 CGR account for the possibility that declining noncore throughput could free up additional interstate pipeline capacity for core use during peak events, thereby reducing the core's need for physical storage inventory?

Response 10.

No. Note that there are corrections to Table MMD-2 headings in columns E and F. Also column D is corrected to 2822 MMcfd to represent SCG and SDG&E core demand, which results in a change to column F.

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Question 11.

If SCG and SDG&E cannot provide the requested information to answer the questions above, state the reason in the response.

Response 11.
N/A