APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2027 COST ALLOCATION PROCEEDING (A.25-09-014)
DATA REQUEST SET 19 FROM CAL ADVOCATES – PUBADV-SCG_SDGE-019-ST
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The following questions refer to Chapter 3 SoCalGas Workpapers:

1. Referring to Table Res-5 on p. 5:

a) Provide all calculations, data sources, and assumptions used to derive the out-of-model adjustments in Table Res-5.

b) Explain why climate change, energy efficiency, and Appliance Efficiency and Fuel Switching

(AAFS) adjustments are applied outside the Navigator model rather than within it. What are the benefits of applying these adjustments outside of the Navigator model?

c) Provide all workpapers showing how these adjustments interact with Navigator outputs. E.g., what specific numbers (outputs from Navigator) are these adjustments applied to?

Response

a) See "PubAdv-SCG_SDGE-019-ST-01_a_c.xlsx"
b) Using an out-of-model adjustment approach resulted in the same result as applying the adjustments in Navigator as both approaches used the same annual figures, reducing a step.
c) See "PubAdv-SCG_SDGE-019-ST-01_a_c.xlsx"

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2. Referring to SoCalGas Table Res-6 on p. 6:

a) The average use per master meter for "existing" vs. "new" customers (e.g., Master Meter (MM): 3,337 vs. 11,314) is more than three-fold different. Explain why.

b) Provide all data sources and calculations used to derive the "Avg Use Per Meter of Existing Customers" and "Avg Use Per Meter of New Customers" in Table Res-6.

c) Provide all calibration steps used to reconcile these average-use values with actual 2024 billing data. If no such steps were taken, explain why it wasn't necessary.

d) Provide an excel file outlining the weather adjustment to the therm sales in the "2024 Weather adjusted Therm Sales" column.

e) Provide calculations in excel showing how the price elasticity of demand was calculated in the final column.

Response

a) Master Metered customer usage is dependent upon the number of dwelling units served by the meter. New Master Metered customers serve more dwelling units than existing Master Meter customers.
b) See "PubAdv-SCG_SDGE-019-ST-02_b_c_d.xlsx"
c) See "PubAdv-SCG_SDGE-019-ST-02_b_c_d.xlsx"
d) See "PubAdv-SCG_SDGE-019-ST-02_b_c_d.xlsx"
e) The price elasticity was calculated in SAS not Excel. See PubAdv-SCG_SDGE-019-ST-2_e for the elasticity model output.

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3. Referring to Table Res-7 on p. 7:

a) Provide all data sources/calculations and explain how SoCalGas determined the steady declines in old vintages and steady increases in new vintages for the different customer segments (not including submeters). Explain and justify each trend separately by customer segment.

b) Provide all demographic, housing, and construction forecasts used to derive the account counts in Table Res-7.

c) Explain how local building electrification ordinances were incorporated into the forecast of new gas accounts. If not incorporated, explain why.

d) Provide all assumptions regarding fuel substitution or electrification that affect account growth. If assumptions for fuel substitution or electrification were not used to determine account growth, explain why.

e) Provide a breakdown of projected new gas accounts by customer segment for each year 2025–2031, including the portion attributable to new construction versus conversions or other factors.

Response

a) See "PubAdv-SCG_SDGE-019-ST-03_a.xlsx" for account counts calculations.
b) See attached PubAdv-SCG_SDGE-019-ST-03_b.xlsx
c) State not local building electrification regulations were incorporated into the new customer forecast. SoCalGas does not forecast meters to a granular municipality level.
d) Elimination of mixed fuel line extension and Title 24 were assumed to reduce the unadjusted new meter forecast by 40 percent annually.
e) SoCalGas forecasts net additions of total customers by customer segment not new accounts. See Chapter 3 Workpaper Table Res-7 for breakout of residential customers by building vintage (before 2021 and after 2024) based on SoCalGas' customer forecast.

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4. Referring to Table Res-8 on p. 8:

a) Provide the definition of "Units" for each segment in Table Res-8 and explain why MM and Submeter (SM) have units that differ from account counts.

b) Provide all data sources used to determine the number of units per account.

c) Explain whether the SIZE factor was used to adjust units over time, and provide all SIZE inputs.

Response

a) For single family and multifamily meters, one units equal one meter. For master meter (MM) and sub-meter, one meter is associated with more than one unit.
b) See Chapter 3 Workpaper Table SoCalGas Res-6 Units Per Meter.
c) SIZE factor tab is not used in Navigator.

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5. Referring to Tables Res-9 and Res-10 on pp. 9-12:

a) Provide all data sources, supporting documents and researched information used to determine saturation values in Tables Res-9 and Res-10.

b) Provide any surveys, studies, or empirical data supporting the assumption that saturations remain constant through 2031.

c) Explain how appliance turnover was modeled for each end use. If appliance turnover was not modeled to determine saturation, explain why.

d) Provide all assumptions regarding electrification impacts on saturation (e.g., heat pump adoption).

e) Provide the methodology used to differentiate saturation between old and new vintages.

Response

Response will be provided at a later date.

6. Referring to Tables Res-11 and Res-12 on pp. 13-16:

a) Provide all data sources used to determine the base-year fuel share values, including:

• customer billing data (since this data is strictly confidential, provide what can be feasibly provided in aggregate).

• appliance saturation surveys

• engineering studies• external datasets (e.g., Residential Energy Consumption Survey (RECS) from the Energy Information Administration (EIA), California Energy Commission (CEC) surveys, etc).

b) Describe the methodology used to derive fuel share values for each end use. Include all formulas, assumptions, and adjustments.

c) Explain why fuel share values were held constant throughout the entire forecast period (2025-2031). Provide any surveys, studies, or empirical data supporting this assumption.

d) Provide all assumptions used for fuel share calculations regarding:

• heat pump adoption

• electric appliance adoption

• local gas bans

• Title 24 building code impacts• decarbonization policies

e) Provide all calibration steps used to align fuel share assumptions with actual 2024 customer usage patterns.

f) Provide any benchmarking or validation studies comparing SoCalGas's fuel share assumptions to:

• CEC Integrated Energy Policy Report (IEPR) assumptions

• statewide electrification forecasts

• local building electrification ordinances

Response

Response will be provided at a later date.

7. Referring to Tables Res-13 and Res-14 on pp. 17-20:

a) Provide all data sources used to derive Unit Energy Consumption (UEC) values, including:

- billing data
- engineering models
- appliance efficiency studies
- external datasets (e.g., Residential Energy Consumption Survey (RECS) from the Energy Information Administration (EIA), CEC appliance data, etc)

b) Describe the methodology used to derive UEC values for each end use. Include all formulas, assumptions, and adjustments.

c) Explain how UECs differ between old and new vintages and provide the data supporting these differences. Include all assumptions regarding the efficiency of new construction appliances and equipment.

d) Explain how SoCalGas calculated the UEC trends over the 2025-2031 period. Provide any studies, surveys, or empirical data supporting the UEC trends for all end uses in both tables.

e) Provide all assumptions regarding:

- appliance turnover
- efficiency improvements
- Title 20/24 standards
- electrification impacts on UEC

f) Provide all calibration steps used to align UEC values with actual 2024 throughput by segment and end use.

g) Provide any validation studies comparing UEC assumptions to:

- CEC IEPR end-use intensities
- statewide appliance efficiency trends
- SoCalGas' Demand-Side Management (DSM) program data

Response

a) The Unit Energy Consumption values were calculated based on the calibration of the CGR2024 UEC inputs according to the weather-normalized 2025 base year consumption. The real gas rate forecasts and price elasticities were used to calculate the UEC forecasts. The energy efficiency and the fuel substitutions were treated as out-of-model adjustments and not used to modify UECs. See "PubAdv-SCG_SDGE-019-ST-07.xlsx" for more details.
b) The UEC values for each end use were calibrated based on the weather-normalized consumption of each market segment as well as the updated base year meter counts. See "PubAdv-SCG_SDGE-019-ST-07.xlsx" for more details.
c) The UECs for old and new vintages were calculated separately with different inputs. See "PubAdv-SCG_SDGE-019-ST-07.xlsx" for more details.
d) See Response 7.a.
e) Fuel substitution and energy efficiency impacts applied as out-of-model adjustments
f) See Response 7.a.
g) Applicants object on the ground the request calls for an analysis not conducted by Applicants. No such validation studies have been prepared.

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8. Referring to Table Res-15 on p. 21, explain the methodology used to calculate the real gas rate forecasts over the 2024-2031 period. Provide any excel workpapers, studies, data sources, or surveys used to determine the real rates.

Response

The real gas rate forecasts included the residential class average transportation prices, the estimated procurement prices, and the PPPS that were weighted by the CPI forecasts. See "PubAdv-SCG_SDGE-019-ST-08.xlsx."

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The following questions refer to Chapter 3 SDG&E Workpapers:

9. Referring to Table Res-5 on p.5:

a) Provide all calculations, data sources, and assumptions used to derive the out-of-model adjustments in Table Res-5.

b) Explain why climate change, energy efficiency, and AAFS adjustments are applied outside the Navigator model rather than within it. What are the benefits of applying these adjustments outside of the Navigator model?

c) Provide all workpapers showing how these adjustments interact with Navigator outputs. E.g., what specific numbers (outputs from Navigator) are these adjustments applied to?

Response

a) See "PubAdv-SCG_SDGE-019-ST-09_a_c.xlsx."
b) Using an out-of-model adjustment approach resulted in the same result as applying the adjustments in Navigator as both approaches used the same annual figures, reducing a step.
c) See "PubAdv-SCG_SDGE-019-ST-09_a_c.xlsx."

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10. Referring to Table Res-6 on p. 6:

a) The average use per master meter for "existing" vs. "new" customers (e.g., MM: 2,252 vs. 4,507) is nearly two-fold different. Explain why. In addition, explain how this differs from SoCalGas' three-fold difference.

b) Provide all data sources and calculations used to derive the "Avg Use Per Meter of Existing Customers" and "Avg Use Per Meter of New Customers" in Table Res-6.

c) Provide all calibration steps used to reconcile these average-use values with actual 2024 billing data. If no such steps were taken, explain why they were not necessary.

d) Provide an excel file outlining the weather adjustment to the therm sales in the "2024 Weather adjusted Therm Sales" column.

e) Provide calculations in excel showing how the price elasticity of demand was calculated in the final column.

Response

a) Master Metered customer usage is dependent upon the number of dwelling units served by the meter. New Master Metered customers serve more dwelling units than existing customers. SDG&E new average dwelling units is less than SoCalGas which impacts average use per customer.
b) See "PubAdv-SCG_SDGE-019-ST-10_b_c_d.xlsx."
c) See "PubAdv-SCG_SDGE-019-ST-10_b_c_d.xlsx."
d) See "PubAdv-SCG_SDGE-019-ST-10_b_c_d.xlsx."
e) The price elasticity was calculated in SAS not Excel. See PubAdv-SCG_SDGE-019-ST-10_e for the elasticity model output.

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11. Referring to Table Res-7 on p. 7:

a) Provide all data sources/calculations and explain how SDG&E determined the steady declines in old vintages and steady increases in new vintages for the different customer segments (not including submeters). Explain and justify each trend separately by customer segment.

b) Provide all demographic, housing, and construction forecasts used to derive the account counts in Table Res-7.

c) Explain how local building electrification ordinances were incorporated into the forecast of new gas accounts. If not incorporated, explain why.

d) Provide all assumptions regarding fuel substitution or electrification that affect account growth. If assumptions for fuel substitution or electrification were not used to determine account growth, explain why.

Response

a) See "PubAdv-SCG_SDGE-019-ST-11_a.xlsx" for the account counts calculations.
b) See Response to 3 b.
c) State not local building electrification regulations were incorporated into the new customer forecast.
d) Elimination of mixed fuel line extension and Title 24 were assumed to reduce the unadjusted new meter forecast by 50 percent.

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12. Referring to Table Res-8 on p. 8:

a) Provide all data sources SDG&E used to determine the number of units per account.

b) Explain whether the SIZE factor was used to adjust units over time and provide all SIZE inputs.

Response

a) See Chapter 3 Workpaper Table SDG&E Res-6 Units Per Meter.
b) SIZE factor tab is not used in Navigator.

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13. Referring to Tables Res-9 and Res-10 on pp. 9-12:

a) Provide all data sources, supporting documents and researched information used to determine saturation values in Tables Res-9 and Res-10.

b) Provide any surveys, studies, or empirical data supporting the assumption that saturations remain constant through 2031.

c) Explain how appliance turnover was modeled for each end use. If appliance turnover was not modeled to determine saturation, explain why.

d) Provide all assumptions SDG&E used regarding electrification impacts on saturation (e.g., heat pump adoption).

Response

Response will be provided at a later date.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2027 COST ALLOCATION PROCEEDING (A.25-09-014)
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14. Referring to Tables Res-11 and Res-12 on pp. 13-16:

a) Provide all data sources SDG&E used to determine the base-year fuel share values, including:

- customer billing data (since this data is strictly confidential, provide what can be feasibly provided in aggregate).
- appliance saturation surveys
- engineering studies
- external datasets (e.g., Residential Energy Consumption Survey (RECS) from the Energy Information Administration (EIA), CEC surveys, etc).

b) Describe the methodology used to derive fuel share values for each end use. Include all formulas, assumptions, and adjustments.

c) Explain why fuel share values were held constant throughout the entire forecast period (2025-2031). Provide any surveys, studies, or empirical data supporting this assumption.

d) Provide all assumptions used for fuel share calculations regarding:

- heat pump adoption
- electric appliance adoption
- local gas bans
- Title 24 building code impacts
- decarbonization policies

e) Provide all calibration steps used to align fuel share assumptions with actual 2024 customer usage patterns.

f) Provide any benchmarking or validation studies comparing SDG&E's fuel share assumptions to:

- CEC IEPR assumptions
- statewide electrification forecasts
- local building electrification ordinances

Response

Response will be provided at a later date.

15. Referring to Tables Res-13 and Res-14 on pp. 17-20:

a) Provide all data sources SDG&E used to derive UEC values, including:

- billing data
- engineering models
- appliance efficiency studies
- external datasets (e.g., Residential Energy Consumption Survey (RECS) from the Energy Information Administration (EIA), CEC appliance data, etc)

b) Describe the methodology used to derive UEC values for each end use. Include all formulas, assumptions, and adjustments.

c) Explain how UECs differ between old and new vintages and provide the data supporting these differences. Include all assumptions regarding the efficiency of new construction appliances and equipment.

d) Explain how SDG&E calculated the UEC trends over the 2025-2031 period. Provide any studies, surveys, or empirical data supporting the UEC trends for all end uses in both tables.

e) Provide all assumptions regarding:

- appliance turnover
- efficiency improvements
- Title 20/24 standards
- electrification impacts on UEC

f) Provide all calibration steps used to align UEC values with actual 2024 throughput by segment and end use.

g) Provide any validation studies comparing UEC assumptions to:

- CEC IEPR end-use intensities
- statewide appliance efficiency trends
- SoCalGas' Demand-Side Management (DSM) program data

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Response 15. a) – g)

a) See Response 7.a and "PubAdv-SCG_SDGE-019-ST-15.xlsx" for more details.
b) See Response 7.b and "PubAdv-SCG_SDGE-019-ST-15.xlsx" for more details.
c) See "PubAdv-SCG_SDGE-019-ST-15.xlsx."
d) See "PubAdv-SCG_SDGE-019-ST-15.xlsx."
e) Fuel substitution and energy efficiency impacts applied as out-of-model adjustments.
f) See "PubAdv-SCG_SDGE-019-ST-15.xlsx."
g) Applicants object on the ground the request calls for an analysis not conducted by Applicants. No such validation studies were prepared.

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16. Referring to Table Res-15 on p. 21, explain the methodology used to calculate the real gas rate forecasts over the 2024-2031 period. Provide any excel workpapers, studies, data sources, or surveys used to determine the real rates.

Response

The real gas rate forecasts included the residential class average transportation prices, the estimated procurement prices, and the PPPS that were weighted by the CPI forecasts. See "PubAdv-SCG_SDGE-019-ST-16.xlsx."