

**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 1 FROM CLEAN ENERGY
DATED APRIL 23, 2026
SOCALGAS RESPONSE DATED: MAY 7, 2026**

QUESTION 1

Please provide a working electronic copy of every Excel spreadsheet (or other Excel model) that was used in preparing SoCalGas's Application and supporting testimony. As used in this data request, working Excel spreadsheets contain all data used and all formulas employed to derive the tables and charts shown in the testimony and workpapers, or otherwise support figures stated or conclusions drawn in the testimony and workpapers. Working Excel spreadsheets contain all links to other Excel spreadsheets in active format.

RESPONSE

Please refer to the following list of executable versions of SoCalGas and SDG&E's workpapers in native format sent via SoCalGas electronic data transfer (EDT):

- Ch 1 Dandridge_Storage Workpapers 2027 CAP
- Ch 2 Martinez_Scg Weather Design CAP 2027
- Ch 2 Martinez_Scg Weather Design_Peak_Day_Design CAP 2027
- Ch 2 Martinez_Sdge Weather Design CAP 2027
- Ch 2 Martinez_Sdge Weather Design_Peak_Day_Design CAP 2027
- Ch3 Martinez_Meters_Res_Core_NGV_Gas_Price_Core_Brokerage_Fee Workpapers 2027 CAP
 - a. Note the following Chapter 3 testimony table title clarifications:
 - b. Table EM-15, line 15 on page EM-16, should be titled Table EM-16
 - c. Table EM-16, line 17 on page EM-17, should be titled Table EM-18
 - d. Table EM-17, line 1 on page EM-18, should be titled Table EM-19
 - e. Table EM-18, line 7 on page EM-18, should be titled Table EM-20
 - f. Table EM-13, line 13 on page EM-19, should be titled Table EM-21
- Ch 4 Fiola EG Forecast Workpapers 2027 CAP
- Ch 5 Martinez_Scg_MDM_Core_2027 CAP
- Ch 5 Martinez_Scg_MDM_Summary_2027 CAP
- Ch 5 Martinez_Scg_noncore_Ind_2027 CAP
- Ch 5 Martinez_Scg_Refinery_2027 CAP
- Ch 5 Martinez_ScgSmCoGen_2027 CAP
- Ch 5 Martinez_Sdge_MDM_Summary_2027 CAP

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- Ch 5 Martinez_Sdge_noncore_forecast_2027 CAP
- Ch 5 Martinez_Sdge_noncore_Com_Summary_2027 CAP
- Ch 8 Seres_Schmidt-Pines_Cost Allocation_2027 CAP
- Ch 8 Seres_Schmidt-Pines_SCG Embedded Cost Model_2027 CAP
- Ch 8 Seres_Schmidt-Pines_SDGE Embedded Cost Model_2027 CAP
- Ch 9 Schmidt-Pines_SDGE Cost Allocation tables_2027 CAP
- Ch 9 Schmidt-Pines_SDGE LRMC Customer Costs_2027 CAP
- Ch 9 Schmidt-Pines_SDGE LRMC Distribution Costs_2027 CAP
- Ch 9 Schmidt-Pines_SDGE LRMC OM Loaders_2027 CAP
- Ch 9 Schmidt-Pines_SDGE Misc Data_2027 CAP
- Ch 9 Schmidt-Pines_SCG LRMC Customer Costs_2027 CAP
- Ch 9 Schmidt-Pines_SCG LRMC Distribution Costs_2027 CAP
- Ch 9 Schmidt-Pines_SCG LRMC OM loader_2027 CAP
- Ch 9 Schmidt-Pines_SCG Cost Allocation tables_2027 CAP
- Ch 10 Borkovich_BTS_Min. Design Standard Capacity Final & Graph_2027 CAP
- Ch 10 Borkovich_BTS_Net System Capacity 2022-2024_2027 CAP
- Revised_Ch 12 Foster_SCG Fixed Cost Analysis_12-29-2025
- Ch 12 Foster_SCG NGV Compression Rate Adder_2027 CAP
- Revised_Ch 12a Foster_SCG Rate Design Model_12-29-2025
- Ch 12 Foster_SCG Submeter Credit_2027 CAP
- Ch 12 Foster_SDGE NGV Compression Rate Adder_2027 CAP
- Revised_Ch 12 Foster_SDGE Rate Design Model_12-29-2025
- Ch 12 Foster_SDGE Submeter Credit_2027 CAP

SoCalGas's and SDG&E's support to the workpapers in native format include the following:

- Sup_Ch 3 Martinez SCG Meter Forecast WP-2027 CAP
- Sup_Ch 3 Martinez SCG Navigator Output Core Market WP_2027 CAP
- Sup_Ch 3 Martinez SCG Summary WP_2027 CAP
- Sup_Ch 3 Martinez SDGE Meter Forecast WP-2027 CAP
- Sup_Ch 3 Martinez SDGE Navigator Output Core Market WP_2027 CAP
- Sup_Ch 3 Martinez SDGE Summary WP_2027 CAP
- Sup_Ch 5 Martinez SCG NC Retail Gas Demand UEG EWG LgCogen WP_2027 CAP
- Sup_Ch 5 Martinez SCG Other Wholesale WP_2027 CAP
- Sup_Ch 5 Martinez SCG Refinery WP_2027 CAP

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- Sup_Ch 5 Martinez SCG SmCoGen WP_2027 CAP
- Sup_Ch 5 Martinez CAT WP_2027 CAP
- Sup_Ch 5 Martinez CoreStorageAssetAllocation WP_2027 CAP
- Sup_Ch 5 Martinez CoUseFuel&UAF_2027 CAP
- Sup_Ch 5 Martinez SCG MDM_Core WP_2027 CAP
- Sup_Ch 5 Martinez SCG NC Com WP_2027 CAP
- Sup_Ch 5 Martinez SCG NC Ind WP_2027 CAP
- Sup_Ch 5 Martinez SCG NC Retail Gas Demand EOR WP_2027 CAP
- Sup_Ch 5 Martinez SDGE DEG WP_2027 CAP
- Sup_Ch 5 Martinez SDGE NC WP_2027 CAP
- Sup_Ch 5 Martinez SDGE SmCogen_2027 CAP
- Sup_Ch 5 Martinez SDGE Summary WP_2027 CAP
- Sup_Ch 8 Seres_Schmidt-Pines Tax 2024 Workpapers Ad Valorem&SIT_FIT WP_2027 CAP
- Sup_Ch 10 Borkovich 2020 Open Season Awarded Capacity_2027 CAP
- Sup_Ch 10 Borkovich 2023 Open Season Awarded Capacity_2027 CAP

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QUESTION 2

Please provide a copy of SoCalGas and SDG&E's FERC Form 2 in Excel format.

RESPONSE

Applicants object on the ground the request is vague and ambiguous as to the year/timeframe sought in the request. Subject to the foregoing, Applicants do not have access to Excel files of SoCalGas and SDG&E's FERC Form 2. See files, FERC 2024 SDGE Annual FERC Form1 and 2 and FERC 2024 SoCalGas Annual FERC Form 2. Files sent via SoCalGas EDT.

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QUESTION 3

Please provide a copy of the 2024 California Gas Report workpapers in Excel format.

RESPONSE

SoCalGas clarified with Clean Energy's counsel the scope of the request. Clean Energy stated that it was sufficient for SoCalGas to provide pages 279-287, which is the SoCalGas NGV workpaper.

Please see CleanEnergy_01_Q3.xlsx. File sent via SoCalGas EDT.

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QUESTION 4

Refer to Chapter 12, *Prepared Direct Testimony Of Michael Foster On Behalf Of Southern California Gas Company And San Diego Gas & Electric Company* (Chapter 12), page MF-39, lines 5-8:

- a. Please produce the referenced study or studies that present a tiered core rate option and a noncore rate option for NGV customers.
- b. For each study produced in response to subpart (a), please produce all electronic workpapers, spreadsheets (including Excel files), models, and data files used to develop the study results, in native format, with formulas intact.
- c. Please identify whether SoCalGas evaluated the NGV rate design options presented in the study or studies referenced on page MF-39, lines 5–8 as potential proposals in this proceeding.
- d. If the answer to subpart (c) is yes, please describe the evaluation performed and the criteria used.
- e. If the answer to subpart (c) is no, please explain the reasons SoCalGas did not include the NGV rate design options presented in the study or studies referenced on page MF-39, lines 5–8 as proposed rate design options in this proceeding, including identification of any record limitations, scope determinations, Commission directives, procedural considerations, evidentiary constraints, or other factors that SoCalGas concluded prevented or weighed against inclusion of those options as part of its application.
- f. Please state whether SoCalGas performed any quantitative analysis of the rate, bill, or revenue impacts of the NGV rate design options presented in the study or studies referenced on page MF-39, lines 5–8 (including core and noncore NGV customers)
- g. If the answer to subpart (d) is yes, please produce all analyses relied upon, including calculations, assumptions, inputs, and supporting workpapers in native format.

RESPONSE

- a. Please see file, CleanEnergy_01_Q4.a-NGV Study – 2027 Cost Allocation Proceeding.docx. Files sent via SoCalGas electronic data transfer (EDT).
- b. Please refer to the following list of files sent via SoCalGas EDT:
 - Errata-12_29-_2025-Ch 12 Foster_SCG Rate Design Model_2027 CAP
 - Errata-12_29-_2025-Ch 12 Foster_SDGE Rate Design Model_2027 CAP
 - NGV rate analysis
 - NGV Study

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- SCG-NGV Accounts 2024 no credit cards
 - SDGE_2024 NGV Accounts
- c. SoCalGas did not evaluate the NGV rate design options presented in the study or studies referenced on page MF-39, lines 5–8 as potential proposals in this proceeding.
- d. Not applicable.
- e. According to Decision 24-07-009, Attachment A, Settlement Agreement, “For the next Cost Allocation Proceeding, SoCalGas and SDG&E will make available a study presenting a tiered core rate option as well as a noncore rate option for NGV customers. SoCalGas is not required to present this study as one of their proposals.”
- f. Yes, an analysis regarding the rates was performed.
- g. Please see Response 4.b.

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QUESTION 5

Please explain the use of differing NGV volumes in Chapter 12 Appendices A and B.

Specifically, Appendix A (*Normalization of September 1, 2025 Published Rates*) presents tables showing present and proposed rates and revenues for SDG&E (page MF-A-1) and for SoCalGas (page MF-A-2). In those tables, the volumes shown in columns A and D are identical, and appear to reflect the volumes underlying current rates. By contrast, Appendix B (*LRMC results vs. September Normalized*), presents tables in which the volumes shown in column D reflect updated NGV volumes associated with the CAP forecasts.

RESPONSE

Appendix A compared September rates to September rates normalized. The NGV volumes did not change in these two scenarios. The changes are listed in Appendix A. Appendix B compared September normalized to the demand forecast used in both the LRMC and Embedded Cost studies, Tables MF-1 and MF-2.

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QUESTION 6

Refer to Chapter 4 Workpaper NGV-4, titled *SoCalGas G-NGV Compression Surcharge Analysis Summary*. In footnote 1, SoCalGas states: “Data taken from E3 Report ‘Southern California Gas NGV Compression Rate Adder Calculation for the 2027 CAP,’ Table 12, May 28, 2025”

- a. Please produce a complete copy of the May 28, 2025 E3 Report, including Table 12, and all appendices, assumptions, calculations, and supporting materials relied upon for the data shown in Workpaper NGV-4.
- b. Please produce the native Excel model(s) (including all linked files, worksheets, macros, and calculation tabs) used to develop Table 12 of the E3 report, with all formulas, inputs, and assumptions intact.

RESPONSE

- a. A complete copy of the May 28, 2025, E3 Report is contained in the attachment “CleanEnergy_01_6a-SCG NGV 2027 CAP Report.pdf”. All information provided to E3 is contained in the attachment “CleanEnergy_01_6a-2027 CAP Compression Surcharge Data 051425.xlsx”. Files sent via SoCalGas EDT.
- b. Please see file, “CleanEnergy_01_6b-SCG NGV 2025 Compression Adder.xlsx”. File sent via SoCalGas EDT.

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QUESTION 7

Refer to Chapter 3 Workpaper NGV-1, titled *SoCalGas G-NGV Forecast of Volumes*, which presents historic compressed and uncompressed volumes on an annual basis for years 2021 through 2024 and forecast compressed and uncompressed NGV volumes on a monthly and annual basis for years 2024 through 2031.

The following table was compiled from the “Total” annual volumes presented in Chapter 3 Workpaper NGV-1:

NGV Recorded Vol, MMccf							<u>Compressed</u>
	<u>Compressed</u>		<u>Uncompressed</u>		<u>Total</u>		<u>as % total</u>
	Volume	Growth	Volume	Growth	Volume	Growth	
2021	5.82		149.2		155.0		3.9%
2022	9.24	58.8%	170.7	14.4%	179.9		5.4%
2023	11.63	25.9%	185.4	8.6%	197.0		6.3%
2024	11.7	0.6%	194.2	4.7%	205.9		6.0%
NGV Forecasted Vol, M dth							
	<u>Compressed</u>		<u>Uncompressed</u>		<u>Total</u>		
2024	1204		19762		20966		6.1%
2025	1225	1.7%	21082	6.7%	22307	6.4%	5.8%
2026	1303	6.4%	22245	5.5%	23548	5.6%	5.9%
2027	1399	7.4%	23212	4.3%	24611	4.5%	6.0%
2028	1525	9.0%	23950	3.2%	25475	3.5%	6.4%
2029	1681	10.2%	24432	2.0%	26113	2.5%	6.9%
2030	1867	11.1%	24495	0.3%	26362	1.0%	7.6%
2031	2083	11.6%	24559	0.3%	26642	1.1%	8.5%

- a. As reflected in the table above, SoCalGas projects a 6.7% growth rate in 2025, dropping rapidly to 2.0% by 2029 and flattening to 0.3% through 2031.

By comparison, on page 117 of the *2024 California Gas Report*, 1 SoCalGas stated: “At the end of 2023, there were 358 CNG fueling stations operating in the service territory. The NGV market is expected to grow from 17.4 Bcf in 2024 and reach 29.5 Bcf by 2040, or the equivalent of a 3.4 percent growth per year, on average.”

Please identify and describe the new information since SoCalGas provided the 2024 California Gas Report forecast that explains the significantly lower NGV forecast used in SoCalGas’s 2027 CAP Application.

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- b. Please provide the actual recorded volumes in 2025 for the following:
 - i. NGV compressed volumes
 - ii. NGV uncompressed volumes
 - iii. Volumes associated with the LCFS card program

RESPONSE

- a. Forecasts are developed based on the latest actual historical data, so forecasts developed at different times will yield different projections. Further, the 2027 CAP G-NGV forecast included the impact of CARB ICT regulations.
- b. 2025 actual recorded volumes for NGV compressed volumes, NGV uncompressed volumes, and volumes associated with the LCFS fuel card program were 12,029,161 therms, 205,862,875 therms, and 142,542 therms, respectively.

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QUESTION 8

Please refer to Chapter 3 Workpaper NGV-3, titled *SoCalGas G-NGV Forecast of Volume and Meter Count Growth*.

In footnote 1, SoCalGas provides the following comments about the growth in NGV volume:

2-year average growth used for uncompressed volumes since 2022 annual growth was an outlier (significantly higher) compared to other years as the market recovered from the prior COVID-19 downturn. Future annual growth rate change used to account for expected loss of urban transit bus volumes due to CARB ICT regulations.

- a. Please provide a table showing expected NGV uncompressed volumes broken out by heavy duty trucks, medium duty trucks, transit buses, other buses, waste haulers and passenger vehicles. If this level of detail is not available, please provide a breakdown of how the transit bus volumes cited in the above footnote impact the total projected NGV uncompressed volumes.
- b. Provide a similar table for NGV compressed volumes.

RESPONSE

- a. Applicants object on the ground the request seeks information and/or analysis not conducted by Applicants. Subject to and without waiving the foregoing, Applicants provide the following response: The tables requested cannot be produced because Applicants do not have the data. Declining transit volumes were forecasted based on 2024 actual transit volumes (5,791 M decatherms). Based on an expected 12-year transit bus life, one-twelfth of 2024 actual transit volumes were expected to retire each year. Based on the current ICT regulations, 25% of the retired transit volumes are forecasted to be replaced by zero emission transit buses through 2025, 50% of the retired transit volumes are forecasted to be replaced by zero emission transit buses from 2026 through 2028. Thereafter, 100% of the retired transit volumes are forecasted to be replaced by zero emission transit buses. An annual growth rate change was developed based on these expected changes to uncompressed volumes.
- b. See Response 8.a.