

**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 ED-001 FROM ENERGY DIVISION
DATED APRIL 3, 2026
SOCALGAS RESPONSE DATED: APRIL 22, 2026**

Subject: Inquiry Regarding UAF Gas Demand

Question 1.

In Chapter 5 Testimony, Section VI.B, it is stated that contributions to the major elements of UAF were analyzed using a 2006 study, which is the most recent comprehensive analysis of UAF drivers.

- a. Why has Sempra not conducted an updated UAF study since 2006?
- b. Would Sempra be able to provide an updated study for the current A.25-04-009 proceeding?

Response

- a. While SoCalGas has not conducted an updated UAF study since 2006, it has conducted a review since 2006. In 2024, SoCalGas completed a partial review of its 2022 unaccounted for gas (UAF). That 2022 review examined only the SoCalGas UAF contributions of measurement systems including physical gas meter accuracy and related processes and calculations. There was also a 2024 review of the theft component of UAF.
- b. The instant cost allocation proceeding is A.25-09-014. The request, however, identifies a different case number. Applicants assume this was in error. Hence, Applicants assume that Energy Division intended to refer to A.25-09-014 -- the current cost allocation proceeding -- and respond accordingly.

SoCalGas and SDG&E would not be able to prepare a complete UAF study for use in this proceeding. SoCalGas completed a partial review of 2022 UAF from measurement systems. See PDF file, ED-SCG-01_01b_2022_LUAF.pdf.

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Question 2.

SoCalGas' UAF % of receipts is 0.978%, which is an increase from 0.787% in the previous 2024 Cost Allocation Proceeding. It appears UAF has increased from 2022-2025 despite SoCalGas' leak abatement work. Can SoCalGas provide an explanation for this increase?

Response

As an initial matter, it is incorrect to infer that UAF is primarily caused by natural gas emissions. Rather, UAF gas is simply the difference between total receipts into SoCalGas's and SDG&E's respective service territories and total deliveries within SoCalGas's and SDG&E's respective service territories. The difference is comprised of the following major elements: accounting, measurement, leakage, theft, and other unexplained unaccounted-for volumes of gas. Notably, the UAF review provided in response to question 1 estimates that, for 2022, 75% of UAF (7,339 MDth / 9,772 MDth) was attributable to measurement.

Various factors can contribute to an increase of UAF as a percentage of receipts such as a combination of accounting mechanics, measurement improvements, operational activity, and infrastructure projects. Efforts to reduce physical losses, advancing system modernization, and improving data accuracy may temporarily raise reported UAF as system understanding and transparency continue to improve.