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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Question 2-1.

Please reference Chapter 1 Workpapers to the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals.

a. Please develop and provide an electronic copy of the workpaper that includes the average daily Cycle 5 storage Injection and Withdrawal capacities for the same time period for which median daily capacities were provided in the original workpaper. Please show the computations of average and median Summer and Winter Injection and Withdrawal capacities.

Response a.
See file, IS-02_1a.

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Question 2-2.

Please reference page MMD-2 of Chapter 1, the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, Lines 5-6, where Ms. Dandridge states:

> *In the upcoming CAP period, SoCalGas will use its storage assets to further enhance system reliability, emphasizing the use of storage capacity for maintaining core reliability, system balancing, customer use, and overall system reliability.*

a. Please provide a detailed narrative for each of the above-listed system reliability functions performed by SoCalGas storage (i.e., core reliability, system balancing, customer use, and overall system reliability), describing the reliability infirmities and/or shortalls experienced by SoCalGas during the current 2024-2026 CAP period under the current storage capacity allocations listed on page MMD-2, Lines 15-18.

Response a.

Applicants have not experienced any reliability infirmities or shortfalls during the 2024–2026 CAP period under the current storage capacity allocations. The existing allocations for core reliability, system balancing, customer use, and overall system reliability have been sufficient to meet system needs throughout this period.

Core reliability - Applicants are proposing an allocation of storage capacity to provide reliable year-round supply of natural gas to its core customers. The Commission requires the gas utilities to serve core gas customers in a 1-in-35 cold temperature year (Cold Year) and a 1-in-35 cold peak day (Peak Day). D.02-11-073 at 419 (Ordering Paragraph (OP) 10). This is a from MMD-5, Lines 12 -15.

System Balancing - The balancing function refers to the service provided by the System Operator to accommodate imbalances between a customer's actual usage and the gas it schedules for delivery to the system. These aggregate imbalances result in either under deliveries or over deliveries of gas to the system. SoCalGas utilizes its storage functions of inventory, injection and withdrawal and Operational Flow Orders (OFO) procedures to manage these imbalances to maintain a reliable system. OFOs are economic signals to

customers that the storage assets allocated to the balancing function are forecast to be fully utilized. A low OFO is declared when customers' under-scheduling of deliveries of gas to the system is forecast to be higher than the storage withdrawal capacity allocated to the balancing function. A high OFO is declared when customers' over-scheduling of deliveries of gas to the system is forecast to be higher than the storage injection capacity allocated to the balancing function.

Unbundled Storage (UBS) Program - Provides any creditworthy customer with the opportunity to contract storage services or park and loan services under Rate Schedule G-TBS and Rate Schedule G-PAL, respectively. The UBS program plays a critical role in affordability, stabilizing natural gas prices and, by extension, electric rates, by providing customers with access to storage that would otherwise be unavailable. Storage enables customers to inject natural gas during periods of lower demand and lower prices, and to withdraw natural gas during periods of higher demand and higher prices. This flexibility is a fundamental mechanism for moderating price volatility. Access to storage also reduces exposure to Operational Flow Order (OFO) penalties.

b. Please provide a ranked priority order of the listed reliability functions identified in above if the listed order is not the ranked priority order.

Response b.

Applicants propose a storage allocation for overall system reliability, with an emphasis on the use of storage for maintaining core reliability and then for system balancing and the UBS program.

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Question 2-3.

Please reference page MMD-3 of Chapter 1, the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, Table MMD-1.

a. Please provide a companion table in the same format at Table MMD-1 showing the proposed net changes in capacities and allocations (both volumes and percentages) for CAP period 2027-2029 versus the current capacities and allocations. Please provide an electronic copy of the workpaper used to generate the companion table, with all cell formulas intact.

Response a.
See the following three tables. Also, see file, IS-02_3a.xlsx.

Table MMD-1: Proposed Capacities and Allocations for CAP Period 2027-2029

	Inventory Bcf	Injection Summer MMcfd	Injection Winter MMcfd	Withdrawal Summer MMcfd	Withdrawal Winter MMcfd
Core	76	250	135	540	1500
Balancing	12	184	374	1212	256
UBS	28	15	15	15	15
Wholesale	2.8	9	5	20	55
Total	**118.8**	**458**	**529**	**1787**	**1826**
	Inventory	**Injection Summer**	**Injection Winter**	**Withdrawal Summer**	**Withdrawal Winter**
Core	64.0%	54.6%	25.5%	30.2%	82.1%
Balancing	10.1%	40.2%	70.7%	67.8%	14.0%
UBS	23.6%	3.3%	2.8%	0.8%	0.8%
Wholesale	2.4%	2.0%	0.9%	1.1%	3.0%
	100%	**100%**	**100%**	**100%**	**100%**

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Capacities and Allocations D-24.07.009 Settlement

	Inventory Bcf	Injection Summer MMcfd	Injection Winter MMcfd	Withdrawal Summer MMcfd	Withdrawal Winter MMcfd
Core	80.03	392	150	606	1890
Balancing	12	345	345	1225	400
UBS	25	50	50	50	50
Wholesale	2.47	13	5	19	60
Total	**119.5**	**800**	**550**	**1900**	**2400**
	Inventory	**Injection Summer**	**Injection Winter**	**Withdrawal Summer**	**Withdrawal Winter**
Core	67.0%	49.0%	27.3%	31.9%	78.8%
Balancing	10.0%	43.1%	62.7%	64.5%	16.7%
UBS	20.9%	6.3%	9.1%	2.6%	2.1%
Wholesale	2.1%	1.6%	0.9%	1.0%	2.5%
	100%	**100%**	**100%**	**100%**	**100%**

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Change in Capacities and Allocations for CAP Period 2027-2029 from D-24.07.009 Settlement

	Inventory Bcf	Injection Summer MMcfd	Injection Winter MMcfd	Withdrawal Summer MMcfd	Withdrawal Winter MMcfd
Core	-4.03	-142	-15	-66	-390
Balancing	0	-161	29	-13	-144
UBS	3	-35	-35	-35	-35
Wholesale	0.33	-4	0	1	-5
Total	**-0.7**	**-342**	**-21**	**-113**	**-574**
	Inventory	**Injection Summer**	**Injection Winter**	**Withdrawal Summer**	**Withdrawal Winter**
Core	-3.0%	5.6%	-1.8%	-1.7%	3.4%
Balancing	0.1%	-3.0%	8.0%	3.3%	-2.6%
UBS	2.6%	-3.0%	-6.3%	-1.8%	-1.3%
Wholesale	0.3%	0.3%	0.0%	0.1%	0.5%
	0%	**0%**	**0%**	**0%**	**0%**

Note that injection and withdrawal capacities in D-24.07.009 were based off one day highs observed from a prior period. The injection and withdrawal capacities in the 2027 CAP proposal are based off median observed capacities for the most recent full winter and summer season.

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Question 2-4.

Please reference page MMD-6 of Chapter 1, the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, footnote 7, providing citations to the SoCalGas 2024 California Gas Report prepared by the California Gas and Electric Utilities ("CGR"). Please also reference Table 33 "Core 1-in-35 Year Extreme Peak Day Demand, MMcf/d" on page 157 of the CGR.

TABLE 33 – CORE 1--IN--35 YEAR EXTREME PEAK DAY DEMAND, MMcf/d

Year	SoCalGas Core Demand	SDG&E Core Demand	Other Core Demand	Total Demand	*Estimated AAFS Impact on Core Peak Day Demand*
2024	2,625	302	155	3,082	*-19*
2025	2,600	300	157	3,056	*-39*
2026	2,571	295	158	3,025	*-54*
2027	2,550	293	160	3,003	*-74*
2028	2,528	291	162	2,981	*-95*
2029	2,513	290	163	2,966	*-105*
2030	2,499	289	165	2,952	*-112*

Notes:
(1) 1-in-35 peak temperature cold day SoCalGas core sales and transportation. Forecast embodies the baseline forecast with load modifiers that include changing weather design to account for climate change, assumed EE savings and assumed fuel substitution under AAFS 3 programmatic.
(2) 1-in-35 peak temperature cold day SDG&E core sales and transportation.
(3) 1-in-35 peak temperature cold day core demand of Southwest Gas Corporation, City of Long Beach, City of Vernon, and Ecogas.
(4) The criteria for extreme peak day design are defined as a 1-in-35 likelihood event for each utility's service area. These criteria correlate to a system average temperature of 40.6 degrees Fahrenheit for SoCalGas' service area and 43.5 degrees Fahrenheit for SDG&E's service area.
(5) Estimated impact shown represents SoCalGas and SDG&E's combined AAFS impacts. SoCalGas and SDG&E's AAFS Impacts are included in the forecast of Peak day demand of "SoCalGas Core Demand", "SDG&E Core Demand", and "Total Demand".

The far-right column of Table 33 shows the estimated impacts on core peak day demand of Applicant's fuel substitution assumptions ("AAFS").

a. Please describe any changes Applicant's would make to the proposed allocations of storage inventory, injection and withdrawal rights if the core peak day demand AAFS reductions included in Table 33 are not achieved.

Response a.

If the core peak day demand AAFS reductions are not achieved, the average Peak Day 1-35 demand for 2027-2029 period would be 3074 MMcfd (adding the average of the Estimated AAFS Impact on Core Peak Day Demand for years 2027 –2029 of 91 MMcfd to the 2983 MMcfd). This would result in changes to Table MMD-2 column D to 3074 and column F to 1935 to 2125

b. Please confirm whether the SoCalGas Core Demand column values incorporate all Heating Degree Day (HDD) adjustments proposed by Mr. Eduardo Martinez in his testimony Chapters 2, 3 and 5. See Note (1) in Table 33 above.

Response b.
Not applicable. The SoCalGas Core Demand used for Chapter 1 was from the 2024 California Gas Report (CGR).

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Question 2-5.

Please reference page MMD-6 of Chapter 1, the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, Table MMD-2 and page MMD-7, Line 4 where Ms. Dandridge states "core's Peak Day demand (column D)".

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 Demand MMcfd	Peak Day 1-in-35 Demand MMcfd	Winter Flowing Supply MMcfd (C*100% - 120%)	Storage and Additional Flowing Supply Needed for Peak Day MMcfd (E-F)
76	949	1381	2983	949 to 1139	1844 to 2034

Please also reference pages EM-11 and EM-16 of Chapter 5, the Prepared Direct Testimony of Eduardo Martinez, Noncore and Consolidated Demand Forecasts, Tables EM-7 and EM-13.

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 IS-SCG-02 FROM INDICATED SHIPPERS
DATED FEBRUARY 20, 2026
SOCALGAS RESPONSE DATED: MARCH 7, 2026

Table EM-7
SoCalGas Consolidated Peak Day Demand (MDth/Day)

	2027	2028	2029	3-Year Avg. 2027-2029
Core				
Residential	2,106	2,094	2,088	2,096
Core C&I	559	556	553	556
Gas AC	0.04	0.04	0.04	0.04
Gas Engine	3	3	3	3
NGV	66	68	70	68
Total Core	2,733	2,720	2,713	2,722
Non-Core				
Non-core C&I	497	493	491	493
Electric Generation	874	882	886	880
EOR	29	29	29	29
Total Retail Non-core	1,400	1,403	1,405	1,403
Wholesale and International				
Long Beach	54	54	54	54
SDG&E	545	541	563	550
Southwest Gas	63	63	64	63
Vernon	22	22	22	22
ECOGAS	36	37	38	37
Total Wholesale & Intl.	720	718	741	726
Total Peak Day Demand	**4,853**	**4,842**	**4,859**	**4,851**

Table EM-13
SDG&E Consolidated Peak Day Demand (MDth/day)

	2027	2028	2029	3-Year Avg. 2027-2029
Core				
Residential	206	204	203	204
Core C&I	89	91	92	91
NGV	9	10	11	10
Total Core	304	305	306	305
Noncore				
Noncore C&I	18	18	18	18
Electric Generation	217	213	233	221
Total Noncore	236	231	251	239
Total Peak Day Demand	**540**	**536**	**557**	**544**

a. Please provide a numerical reconciliation of the value 2983 MMcfd shown in column D of Table MMD-2 for Peak Day 1-in-35 Demand with the values 2,722 MDth/day and 305 MDth/day, shown in Tables EM-7 and EM-13, as the 3-Year Average 2027- 2029 Peak Day Demand for SoCalGas and SDG&E, respectively.

Response a.

SoCalGas objects to the extent the data request calls for an analysis that has not been prepared. Neither SoCalGas nor SDG&E has prepared a reconciliation between the peak forecasts from the 2024 CGR and the 2027 CAP applications. [Subject to and without waiving the foregoing, SoCalGas provides the following response. SoCalGas and SDG&E note that the 2,983 MMcfd value shown in column D of Table MMD-2, which represents the average 2027-2029 Core 1-in-35 Year Extreme Peak Demand from Table 33 of the 2024 California Gas Report, includes the core portion of SoCalGas's wholesale load whereas the 2,722 MDth/day value in Table EM-7 does not include the core portion of SoCalGas' wholesale load.] Further, after removing the wholesale core from the 2024 CGR peak day forecast and converting to MMcfd, the resulting 2,822 MMMcfd peak-day demand forecast presented in the 2024 CGR is only 4% different than the combined core peak-day demand forecast presented in Tables EM-7 and EM-13 using a 1.0301 Dth/Mcf Btu factor for SoCalGas and a 1.0258 Dth/Mcf Btu factor for SDG&E.

b. Please provide a narrative of the reconciliation explaining any differences between the values identified in subpart a. above.

Response b.
See Response a.

c. Please identify any Btu conversion factor used to convert Mr. Martinez's MDth/day values to MMcfd values, and vice-versa, and compare it to the Btu factors of 1.0301 and 1.0258 for SoCalGas and SDG&E, respectively, as stated by Mr. Martinez on pages 134 and 141 of Chapter 5 Workpapers to the Prepared Direct Testimony of Eduardo Martinez, Noncore and Consolidated Demand Forecasts.

Response c.
See Response a. SoCalGas and SDGE confirm that the Btu conversion factors listed on pages 134 and 141 of the Chapter 5 Workpapers are the factors used to prepare MDth/day to MMcfd and vice versa conversions.

Question 2-6.

Please reference page MMD-8 of the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, Lines 10-16, where Ms. Dandridge states:

> *In order to support enhanced year-round balancing functions, Applicants are proposing to allocate 12 Bcf of storage inventory, 184 MMcfd of summer injection capacity, 374 MMcfd of winter injection capacity, 1212 MMcfd of summer withdrawal capacity and 256 MMcfd of winter withdrawal capacity to the balancing function. The 12 Bcf of storage inventory allocation will be used to provide 10% monthly balancing when customers create positive imbalances by delivering more gas into the system than what they use, up to 12 Bcf on a combined basis.*

a. Please provide a detailed narrative of the "enhanced" year-round balancing functions being proposed by SoCalGas in addition to the positive 10% monthly balancing tolerance, which is already currently provided to all customers under SoCalGas's Schedule G-IMB (at p.1).

Response a.

Applicants propose to continue with the enhanced year-round balancing functions that are currently provided to all customers. The 12 Bcf of storage inventory will continue to provide 10% monthly balancing and the injection and withdrawal capacities will continue to provide daily balancing when customers bring in more or less supplies against their demand.

b. Please provide an electronic copy of all studies, analyses, reports, presentations and other similar documents prepared by or for the Applicants relating to the need for enhanced year-round balancing functions beyond those currently established for the 2024-2026 CAP period.

Response b.

Not applicable.

Question 2-7.

Please reference page MMD-3 of the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, specifically Table MMD-1 shown below:

Table MMD-1: Proposed Capacities and Allocations for CAP Period 2027-2029

	Inventory Bcf	Injection Summer MMcfd	Injection Winter MMcfd	Withdrawal Summer MMcfd	Withdrawal Winter MMcfd
Core	76	250	135	540	1500
Balancing	12	184	374	1212	256
UBS	28	15	15	15	15
Wholesale	2.8	9	5	20	55
Total	118.8	458	529	1787	1826
	Inventory	Injection Summer	Injection Winter	Withdrawal Summer	Withdrawal Winter
Core	64.0%	54.6%	25.5%	30.2%	82.1%
Balancing	10.1%	40.2%	70.7%	67.8%	14.0%
UBS	23.6%	3.3%	2.8%	0.8%	0.8%
Wholesale	2.4%	2.0%	0.9%	1.1%	3.0%
	100%	100%	100%	100%	100%

a. For each storage field on the PG&E system, please provide that field's respective contribution in Bcf to the Total Inventory capacity of 118.8 Bcf above.

Response a.

SoCalGas objects on the ground the term "PG&E system" misstates testimony and is vague and ambiguous in this context. Given the context of the question, SoCalGas assumes that the question refers to the SoCalGas system and will answer the question accordingly. Subject to and without waiving the foregoing, SoCalGas provides the following response: See Chapter 1, page MMD 3, lines 2-12.

b. For each storage field on the PG&E system, please provide that field's respective contribution in MMcfd to the Total Injection Summer capacity of 458 MMcfd above.

Response b.

SoCalGas objects on the ground the term "PG&E system" misstates testimony and is vague and ambiguous in this context. Given the context of the question, SoCalGas assumes that the question refers to the SoCalGas system and will answer the question accordingly. Subject to and without waiving the foregoing, SoCalGas provides the following response: SoCalGas provides a daily injection capacity that is the combined contribution from all four storage fields.

c. For each storage field on the PG&E system, please provide that field's respective contribution in MMcfd to the Total Injection Winter capacity of 529 MMcfd above.

Response c.

SoCalGas objects on the ground the term "PG&E system" misstates testimony and is vague and ambiguous in this context. Given the context of the question, SoCalGas assumes that the question refers to the SoCalGas system and will answer the question accordingly. Subject to and without waiving the foregoing, SoCalGas provides the following response: SoCalGas provides a daily injection capacity that is the combined contribution from all four storage fields.

d. For each storage field on the PG&E system, please provide that field's respective contribution in MMcfd to the Total Withdrawal Summer capacity of 1787 MMcfd above.

Response d.

SoCalGas objects on the ground the term "PG&E system" misstates testimony and is vague and ambiguous in this context. Given the context of the question, SoCalGas assumes that the question refers to the SoCalGas system and will answer the question accordingly. Subject to and without waiving the foregoing, SoCalGas provides the

following response: SoCalGas provides a daily withdrawal capacity that is the combined contribution from all four storage fields.

e. For each storage field on the PG&E system, please provide that field's respective contribution in MMcfd to the Total Withdrawal Winter capacity of 1826 MMcfd above.

Response e.

SoCalGas objects on the ground the term "PG&E system" misstates testimony and is vague and ambiguous in this context. Given the context of the question, SoCalGas assumes that the question refers to the SoCalGas system and will answer the question accordingly. Subject to and without waiving the foregoing, SoCalGas provides the following response: SoCalGas provides a daily withdrawal capacity that is the combined contribution from all four storage fields.