

**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-09 FROM INDICATED SHIPPERS
DATED APRIL 8, 2026
SOCALGAS RESPONSE DATED: APRIL 22, 2026**

Question 9-1.

Please reference page MMD-9 of Chapter 1, the Prepared Direct Testimony of M. Michelle Dandridge, Storage Overview & Proposals, Lines 7-14, where Ms. Dandridge states:

If there is a Commission order to reduce allowable working storage inventory, reductions to the various classes will be applied as follows. The first 10 Bcf of reduction will be applied to the UBS program. Any reductions above 10 Bcf will be applied pro-rata across all classes to the following floors: core 72 Bcf, wholesale core 2.5 Bcf, Balancing 8 Bcf. Once these floors are met, all remaining reductions will be applied to the UBS program. After the UBS program has reached zero, all remaining reductions will be prorated amongst core, wholesale core, and Balancing.

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

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- a. Please provide a companion table to Table MMD-1 depicting the impacts on storage capacities and allocations in the scenario where the Commission issues an order to reduce allowable working storage inventory by 10 Bcf.
- b. Please provide a companion table to Table MMD-1 depicting the impacts on storage capacities and allocations in the scenario where the Commission issues an order to reduce allowable working storage inventory by 28 Bcf.

Response

a.

Proposed Capacities and Allocations for CAP Period 2027-2029 With a 10 Bcf Reduction to Aliso Working Inventory

	Inventory	Injection Summer	Injection Winter	Withdrawal Summer	Withdrawal Winter
	Bcf	MMcfd	MMcfd	MMcfd	MMcfd
Core	76	250	135	540	1500
Balancing	12	184	374	1212	256
UBS	18	15	15	15	15
Wholesale	2.8	9	5	20	55
Total	108.8	458	529	1787	1826
	Inventory	Injection Summer	Injection Winter	Withdrawal Summer	Withdrawal Winter
Core	69.9%	54.6%	25.5%	30.2%	82.1%
Balancing	11.0%	40.2%	70.7%	67.8%	14.0%
UBS	16.5%	3.3%	2.8%	0.8%	0.8%
Wholesale	2.6%	2.0%	0.9%	1.1%	3.0%
	100%	100%	100%	100%	100%

If there is a 10 Bcf reduction in allowable working inventory, Applicants are proposing a change to the allocation of inventory capacity, but the allocation of injection and withdrawal capacities remains the same as in Table MMD-1.

With a reduction in available working inventory, available injection and withdrawal capacities are expected to be reduced as well, but these expected reductions are unknown at this time. When the actual injection and withdrawal available on any day is higher or lower than the proposed injection and withdrawal capacities in Table MMD-1, the daily capacity allocations to each of the classes will be prorated to the percentages indicated in Table MMD-1.

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b.

Proposed Capacities and Allocations for CAP Period 2027-2029 With a 28 Bcf Reduction to Aliso Working Inventory

	Inventory	Injection Summer	Injection Winter	Withdrawal Summer	Withdrawal Winter
	Bcf	MMcfd	MMcfd	MMcfd	MMcfd
Core	72	250	135	540	1500
Balancing	8	184	374	1212	256
UBS	8.3	15	15	15	15
Wholesale	2.5	9	5	20	55
Total	90.8	458	529	1787	1826
	Inventory	Injection Summer	Injection Winter	Withdrawal Summer	Withdrawal Winter
Core	79.3%	54.6%	25.5%	30.2%	82.1%
Balancing	8.8%	40.2%	70.7%	67.8%	14.0%
UBS	9.1%	3.3%	2.8%	0.8%	0.8%
Wholesale	2.8%	2.0%	0.9%	1.1%	3.0%
	100%	100%	100%	100%	100%

If there is a 28 Bcf reduction in allowable working inventory, Applicants are proposing a change to the allocation of inventory capacity, but the allocation of injection and withdrawal capacities remain the same as in Table MMD-1.

With a reduction in available working inventory, available injection and withdrawal capacities are expected to be reduced as well, but these expected reductions are unknown at this time. When the actual injection and withdrawal available on any day is higher or lower than the proposed injection and withdrawal capacities in Table MMD-1, the daily capacity allocations to each of the classes will be prorated to the percentages indicated in Table MMD-1.

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Question 9-2.

Please reference Table 8 on page C-8 in Attachment C to SoCalGas’s Application (A2509014), excerpted below, specifically rows 8-12 stating storage costs and revenues.

TABLE 8
Backbone Transmission Service and Storage Rates
Southern California Gas Company
09/26/25
11-CAP Proposal-Class Average Rates 2027-2029

	Present Rates			Proposed Rates			Changes			
	04-Rate Change September 1, 2025 - Normalized for CAP			11-CAP Proposal-Class Average Rates 2027- 2029			Revenue Change \$000's	Rate Change \$/th	% Rate change	
	Volumes Mth	Rate \$/th	Revenue \$000's	Volumes Mth	Rate \$/th	Revenue \$000's				
	A	B	C	D	E	F	G	H	I	
1	Backbone Transmission Service BTS									
2	BTS SFV Reservation Charge \$/dth/day	2,406	\$0.78773	\$691,877	2,406	\$0.63795	\$560,322	(\$131,555)	(\$0.14978)	-19.0%
3	BTS MFV Reservation Charge \$/dth/day		\$0.63016			\$0.51036				
4	BTS MFV Volumetric Charge \$/dth		\$0.15755			\$0.12759				
5	BTS Interruptible Volumetric Charge \$/dth		\$0.78773			\$0.63795			(\$0.14978)	-19.0%
6										
7										
8	Storage Costs (incl. HRGMA)									
9	Core \$000			\$179,247		\$191,163		\$11,916		
10	Load Balancing \$000			\$130,504		\$118,762		(\$11,741)		
11	Unbundled Storage \$000			\$31,952		\$35,590		\$3,639		
12				\$341,703		\$345,516		\$3,813		

See footnotes, Table 1.

1) CSITMA - NCCI and EG TLS Tariff rates include CSITMA. Customers exempt (Constitutional Exempt and EG) receive Transportation Charge Adjustment (TCA).

2) CARB Fee - TLS NCCI, EOR and EG Tariff rates include CSITMA, TLS NCCI, EOR and EG customers exempt as they pay CARB Fees directly receive credit.

3) Wholesale Customers excludes CSITMA and CARB Fee since these customers are exempt.

Verify TLS Revenue:

NCCI-T	750,680	\$0.08899	\$66,606	733,661	\$0.10726	\$78,695	\$11,889	\$0.01827	20.5%
EG-T	1,806,969	\$0.08148	\$146,711	1,586,976	\$0.07440	\$147,825	\$1,114	(\$0.00796)	-6.7%
LB	91,703	\$0.06984	\$6,313	84,571	\$0.08491	\$7,181	\$868	\$0.01607	23.3%
SWG	74,685	\$0.06984	\$5,141	89,197	\$0.08491	\$7,574	\$2,433	\$0.01607	23.3%
Vernon	97,040	\$0.06984	\$6,680	84,803	\$0.08491	\$7,201	\$520	\$0.01607	23.3%
Ecogas	139,490	\$0.06984	\$9,603	137,962	\$0.08491	\$11,716	\$2,114	\$0.01607	23.3%
	2,954,567	\$0.08165	\$241,255	3,117,191	\$0.08347	\$260,192	\$18,937	\$0.00182	2.2%

- a. Please provide a companion table for rows 8-12 in Table 8 comparing what the storage cost and revenue allocations between Core, Load Balancing and Unbundled Storage would be for the two scenarios given in Question 9-1.a and 9-1.b above versus the proposed allocations shown in Table 8.
- b. Please state the percentage of the \$345.526 million proposed storage revenue requirement that SoCalGas considers to be fixed cost. If SoCalGas has an internal definition of “fixed cost”, please provide that definition. If SoCalGas does not have a definition for “fixed cost” please assume that fixed costs do not fluctuate with storage injection and withdrawal volumes.

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Response

a. Please see responses to questions 9.1.a. and 9.1.b. Below are the tables requested:

	Present Rates			Proposed Rates			Changes		
	04-Rate Change: September 1, 2025 - Normalized for CAP			21- IS Q9.2a 28 bcf reduction			Revenue Change \$000's	Rate Change \$/th	% Rate change %
	Volumes	Average Rate	Sep-1-25 Revenue	Volumes	Rate	Jan-1-27 Revenue			
	Mth	\$/th	\$000's	Mth	\$/th	\$000's			
A	B	C	D	E	F	G	H	I	
6									
7									
8	Storage Costs: (incl. HRSMA)								
9	Core \$000		\$179,247			\$211,346	\$32,099		
10	Load Balancing \$000		\$130,504			\$117,105	(\$13,398)		
11	Unbundled Storage \$000		\$31,952			\$16,411	(\$15,541)		
12			\$341,703			\$344,862	\$3,159		

	Present Rates			Proposed Rates			Changes		
	04-Rate Change: September 1, 2025 - Normalized for CAP			22- IS Q9.2a 10 bcf reduction			Revenue Change \$000's	Rate Change \$/th	% Rate change %
	Volumes	Average Rate	Sep-1-25 Revenue	Volumes	Rate	Jan-1-27 Revenue			
	Mth	\$/th	\$000's	Mth	\$/th	\$000's			
A	B	C	D	E	F	G	H	I	
6									
7									
8	Storage Costs: (incl. HRSMA)								
9	Core \$000		\$179,247			\$198,991	\$19,744		
10	Load Balancing \$000		\$130,504			\$119,954	(\$10,549)		
11	Unbundled Storage \$000		\$31,952			\$26,252	(\$5,700)		
12			\$341,703			\$345,198	\$3,495		

b. Direct Testimony of F. Seres/M. Schmidt-Pines (Chapter 8) does not classify storage costs as “fixed costs” for purposes of the proposed storage allocation, and Applicants did not prepare a separate “fixed cost” definition for Table FS-MSP-25. Applicants instead refer Indicated Shippers to Chapter 8 and, in particular, Appendix E, which explains the storage cost allocation study and the functionalization and allocation methodology underlying Table FS-MSP-25.