

**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 7 FROM SCGC DATED FEBRUARY 26, 2026
SOCALGAS RESPONSE DATED: MARCH 13, 2026**

Referring Chapter 1, Direct Testimony of Michelle Dandridge and the associated workpaper, “Ch 1 Dandridge Storage Workpapers 2027 CAP,” that show daily storage injection and withdrawal capacity:

Question 7.1.

Please confirm that the storage injection capacity listed in the above referenced workpaper at tab “Storage Injection Capacity”, for any given day during the period, 4/1/24 to 3/31/25, is the same as the storage injection capacity listed on Envoy in the Capacity Utilization table for Cycle 5 for that same day.

Response 7.1.

Yes.

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Question 7.2.

Please explain how the storage injection capacity listed on Envoy in the Capacity Utilization table for Cycle 5 is calculated.

- 7.2.1 Does the storage injection capacity depend upon the pipeline pressures and flows upstream and/or downstream of the storage field?
- 7.2.2 If the answer to the previous question is “yes,” please identify which pipeline pressures and/or flows affect the injection capacity in the storage fields and explain how those pipeline pressures affect the storage injection capacity.
- 7.2.3 Does the storage injection capacity depend upon the number of operating wells in the storage fields?
- 7.2.4 Please provide the number of operating wells during each day of the period, 4/1/24 to 3/31/25, identifying how many wells were available at each storage field.
- 7.2.5 For each day of the period, 4/1/24 to 3/31/25, please list the reduction in storage injections created by maintenance issues.
- 7.2.6 During the forecast period, does SoCalGas forecast similar levels of reductions in storage injections created by maintenance issues as shown in the answer to the previous question.
- 7.2.7 Please explain the answer to the previous question in detail.

Response 7.2.

7.2.1 to 7.2.2

The injection capacities provided on Envoy represent the actual injection capacities that the Gas Control department can provide on any given day or cycle. As such, they reflect the state of the SoCalGas transmission and storage system at that time, as well as the volume and location of supplies delivered by our customers.

7.2.3 Yes.

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7.2.4 The following files responsive to question 7.2.4. contain confidential information and are being provided pursuant to the Non-Disclosure Agreement executed on October 14, 2025, between SoCalGas and Southern California Generation Coalition (SCGC) in A.25-09-014:

- **CONFIDENTIAL_AC** Well Availability 4.1.2024-3.31.25.xlsx
- **CONFIDENTIAL_HR** Well Availability 4.1.2024-3.31.25.xlsx
- **CONFIDENTIAL_LG** Well Availability 4.1.2024-3.31.25.xlsx
- **CONFIDENTIAL_PDR** Well Availability 4.1.2024-3.31.25.xlsx

Operating wells in service at each storage field are not publicly available but are provided in the attached document.

7.2.5. Impacts to injection capacity are publicly available on Envoy under Operations menu, in the Maintenance Schedules window, and can be filtered by date.

7.2.6. Yes

7.2.7. The past year actual injection capacities are the best indicators at this time for the expected injection capacities for the forecast period.

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Question 7.3.

Please confirm that the storage withdrawal capacity listed in the above referenced workpaper at tab “Storage Injection Capacity”, for any given day during the period, 4/1/24 to 3/31/25, is the same as the storage withdrawal capacity listed on Envoy in the Capacity Utilization table for Cycle 5 for that same day.

- 7.3.1. Please explain in detail the numerical process that SoCalGas used to determine the total daily customer imbalance of 1,079,747 Dth. Please explain the answer to the previous question in detail.
- 7.3.2. If the answer to the previous question is “yes,” please identify which pipeline pressures and/or flows affect the withdrawal capacity in the storage fields and explain how those pipeline pressures affect the storage withdrawal capacity.
- 7.3.3. Does the storage withdrawal capacity depend upon the number of operating wells in the storage fields?
- 7.3.4. Please provide the number of operating wells during each day of the period, 4/1/24 to 3/31/25, identifying how many wells were available at each storage field.
- 7.3.5. For each day of the period, 4/1/24 to 3/31/25, please list the reduction in storage withdrawals created by maintenance issues.
- 7.3.6. During the forecast period, does SoCalGas forecast similar levels of reductions in storage withdrawals created by maintenance issues as shown in the answer to the previous question.
- 7.3.7. Please explain the answer to the previous question in detail.

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Response 7.3.

7.3.1. to 7.3.2.

SoCalGas objects on the ground the request is incomplete inasmuch as it seeks information regarding a daily customer imbalance without referencing the date. SoCalGas also objects on the ground the request misstates evidence regarding its preliminary characterization of workpapers.

Subject to and without waiving the foregoing, SoCalGas provides the following response: The withdrawal capacities provided on Envoy represent the actual withdrawal capacities that the Gas Control department can provide on any given day or cycle. As such, they reflect the state of the SoCalGas transmission and storage system at that time, as well as the volume and location of supplies delivered by our customers.

7.3.3 Yes.

7.3.4 The following files responsive to question 7.3.4. contain confidential information and are being provided pursuant to the Non-Disclosure Agreement executed on October 14, 2025, between SoCalGas and Southern California Generation Coalition (SCGC) in A.25-09-014:

See **CONFIDENTIAL** files responsive to question 7.2.4.

Operating wells in service at each storage field are not publicly available but are provided in the attached document.

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7.3.5 Impacts to withdrawal capacity are publicly available on Envoy under Operations menu, in the Maintenance Schedules window, and can be filtered by date.

7.3.6 Yes.

7.3.7 The past year actual withdrawal capacities are the best indicators at this time for the expected withdrawal capacities for the forecast period.

Question 7.4.

Regarding the statement at page MMD-4: “As an initial matter, peak injection capacity is typically achieved at low storage inventory levels.” Yet, the median summer injection capacity for 2024 was 458 MMcfd when storage inventories are relatively low while the median winter injection capacity was 529 MMcfd while storage inventories are high. Please explain in detail why injection levels were so much lower during the summer than the winter.

Response 7.4.

The average storage inventory for the summer of 2024 was 102.6 Bcf (low of 95 Bcf on April 5, 2024 and high of 107.1 Bcf on August 25, 2024), which was higher than the average storage inventory for the winter of 2024-2025 of 90.3 Bcf (high of 106.4 Bcf on November 15, 2024 and low of 70.8 Bcf on March 14, 2025). The seasonal medians reflect these conditions, with summer injection lower than winter injection.

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Question 7.5.

Why is SoCalGas recommending that the median capacity value for summer and winter injection during the period, 4/1/24 to 3/31/25, rather than maximum capacity be used to define forecasted injection capacity for the forecast period?

Response 7.5.

The median capacity value is a better representation of the expected available injection capacity for the forecast period than the one day observed maximum capacity.

Question 7.6.

Why is SoCalGas recommending that the median capacity value for summer and winter withdrawal during the period, 4/1/24 to 3/31/25, rather than maximum capacity be used to define forecasted withdrawal capacity for the forecast period?

Response 7.6.

The median capacity value is a better representation of the expected available withdrawal capacity for the forecast period than the one day observed maximum capacity.

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Question 7.7.

SoCalGas states that it is “proposing storage capacities of inventory, injection and withdrawal equal to approximately 3% of the storage capacities allocated to the core customers of SoCalGas and SDG&E” for its wholesale customers, Southwest Gas and Long Beach. However, a comparison of SoCalGas’s proposal for core and wholesale capacities show that the percentages actually range between 3.60 percent and 3.70 percent while the ratios for core and wholesale capacities adopted in the last CAP settlement ranged between 3.09 percent and 3.33 percent.

- 7.7.1. Please explain in detail the numerical process that SoCalGas used to determine the total daily customer imbalance of 1,079,747 Dth. Please explain the answer to the previous question in detail. Why is SoCalGas proposing to increase the wholesale share of storage capacities from a range of 3.09-3.33 percent to a range of 3.60-3.70 percent?
- 7.7.2. Has SoCalGas received requests from either of its wholesale customers to increase the share of storage capacities allocated to wholesale customers?
- 7.7.3. If the answer to the previous question is “yes,” please provide a copy of the request that SoCalGas received from either or both of its wholesale customers.

Response 7.7.

- 7.7.1. SoCalGas objects on the ground the request is incomplete inasmuch as it seeks information regarding a daily customer imbalance without referencing the date. Subject to and without waiving the foregoing, SoCalGas provides the following response: The storage proposal was to maintain an allocation similar to the allocation for the current CAP period. In the proposal, the allocations to the core changed, while the allocations to the wholesale core remained approximately the same resulting in a higher % of wholesale core to core.
- 7.7.2. No.
- 7.7.3. Not applicable.