

**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 2 FROM –TURN DATED MARCH 9, 2026
SOCALGAS RESPONSE DATED: APRIL 9, 2026 - REVISED**

Question 2-3.

On page MMD-8, the testimony states that: “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. When positive imbalances are created by customers, there needs to be inventory space available within storage to accommodate supply over deliveries by customers.”

- a. When *negative* imbalances are created by customers, doesn't there also need to be gas in inventory to accommodate under-deliveries by customers?
- b. If *cumulative* customer imbalances are negative, where will the gas in inventory come from to accommodate under-deliveries?

Response - Revised

- b. As is the case today, the gas stored in inventory by all customers will be temporarily used to accommodate under-deliveries by all customers, until such point as the gas is replaced through positive imbalances.

SoCalGas provides Monthly Imbalance Service for its transportation customers under Rate Schedule G-IMB. Monthly Imbalance Service has four components: 1) Imbalance Trading; 2) no-charge Balancing Service; 3) Standby Procurement; and 4) Buy-Back. Balancing Service is provided at no charge if the customer's cumulative imbalance at the end of the monthly imbalance trading period is within +10%/-8% of the customers defined usage.

SoCalGas also has the option to declare a Low Operational Flow Order (OFO) when daily aggregated under-deliveries are forecast to exceed the capacity reserved for this purpose in order to incentivize individual customers to reduce their respective under-deliveries.