

**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 5 FROM –TURN DATED APRIL 15, 2026
SOCALGAS RESPONSE DATED: APRIL 29, 2026**

Question 1.

SoCalGas’s rate design model (“Revised_Ch_12a_SCG Rate Design Model _ 12-29-2025”) includes 25 scenario options.

- a. Please provide a description of each scenario.
- b. Scenario 4 is “Rate Change September 1, 2025 – Normalized for CAP.” Is this the scenario most representative of rates with the current customer charge, for purposes of comparison with the CAP proposal of a higher customer charge? If not, please identify the scenario which provides this comparison.
- c. If the answer to (b) is yes, why are the baseline, non-baseline, and PPPS charges higher under the CAP proposal scenario 8 compared to scenario 4?
- d. If the answer to (b) is yes, why are commodity charges lower under the CAP proposal scenario 8 compared to scenario 4?
- e. Scenario 19 includes “No fixed charge” with a 10% meter and 50% load decline. Does any scenario include “no fixed charge” without these meter and load change assumptions? If so, please identify that scenario.
- f. For each of the CAP proposal scenarios, what is SoCalGas assuming in terms of meter and load decline?

Response

- a. See the following list of scenario descriptions:
 - Scenarios 1-3-September 2025 rates
 - Scenarios 4-6 September 2025 rates normalized for CAP: For purposes of isolating rate and bill impacts presented in this chapter to the impacts generated directly by the CAP proposals, present September 1, 2025 tariffed rates have been normalized by making the following 5 adjustments: 1) the border cost of gas is updated and consistent across all scenarios presented, 2) the Backbone Transportation Balancing Account (BTBA) balance has been set to zero, and is consistent across all scenarios presented, 3) residential sub meter credits are recalculated based on inputs as of September 1, 2025 as opposed to the actual settled September 1, 2025 value, and will be updated in each scenario presented based on proposals, 4) the CARE discount is recalculated using September 1, 2025 class average rates, and will be updated in each scenario presented based on proposals, and 5) SoCalGas Exchange Revenues & Inter-utility Transactions revenue updated to authorized 2025 amount.

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- Scenario 7 LRMC
 - Scenario 8-11, 15-18, 21-25 CAP proposal- Class average Rates-reflect placeholder CAP scenarios, where fixed charge is unchanged
 - Scenario 12-CAP proposal 2027: \$5 fixed charge
 - Scenario 13- CAP proposal 2028: \$12/\$6 for non-CARE/CARE respectively
 - Scenario 14 CAP proposal 2029: \$20/\$10 for non-CARE/CARE respectively
- Scenarios 19 and 20 reflect a 50% load reduction and a 10% meter count reduction for the residential class (with all other factors unchanged). Scenario 19 reflects \$5 fixed charge and Scenario 20 reflects \$20 for non-CARE customers and \$10 for CARE customers.
- b. Comparing scenario 4 against scenarios 12 (2027), 13 (2028) or 14 (2029) will show the impact of all CAP proposals including fixed customer charge proposals. To compare CAP proposal with higher fixed charge against CAP proposal with current fixed charge, scenario 13 (2028) or 14 (2029) should be compared to scenario 12 (2027).
- c. The baseline and non-baseline rates are increasing primarily due to an increase in the Customer Costs from Scenario 4 to Scenario 8. Increased residential customer related costs will increase residential revenue requirements; therefore, increase the residential transportation baseline rate and non-baseline rate directly. PPS rates in each scenario are dynamically reflecting the impact of residential rates in respective scenarios. The CARE discount is a function of the residential class average transportation rate. In scenarios where the class average residential rate changes, the CARE discounted amount changes, and therefore the PPS rate will change in the same direction.
- d. Commodity charges are lower under the CAP proposal Scenario 8 compared to Scenario 4 as Scenario 8 incorporates the following CAP-related changes:
- Core Brokerage Fee
 - BTS Rate
- e. As described in Response 1a, Scenario 19 reflects a 50% load reduction and a 10% meter count reduction for the residential class (with all other factors unchanged) when there is no fixed charge increase. 50% load reduction and a 10% meter count reduction is only assumed in Scenarios 19 and 20.
- f. For CAP proposal scenarios meter and load are based on CAP demand forecasts.

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Question 2.

In response to TURN DR 3, Question 10, SoCalGas stated that its rate design workpapers present bill impacts of different fixed charge scenarios (rows 38-39 of “TestimonyTbl-Trans Rate Impact” tab of “Revised_Ch_12a_SCG Rate Design Model_12-29-2025”).

- a. Why are bill impacts of the 2027-2029 avg. CAP proposal the same as the impacts of the 2027 proposal (which includes no change to the fixed charge)?

		CAP 2027-2029 Avg proposal	CAP 2027 proposal	CAP 2028 proposal	CAP 2029 proposal
Residential Non-CARE class average bill	\$/month	85.31	85.31	84.53	83.02
Residential CARE class average bill	\$/month	47.23	47.23	43.71	40.87

- b. Why does SoCalGas assume no change to the fixed charge (from the existing \$4-5) when calculating the “CAP Proposal – Class Average Rates 2027-2029” scenario bill impacts on tabs “Res Bill Zone 1-3” (as shown in input rows 81-83)?

Response

- a. As described above in Response 1a, “CAP Proposal – Class Average Rates 2027-2029” is a CAP placeholder scenario where fixed charge is not changed, and it is similar to CAP 2027 proposal, where the fixed charge is not changed.
- b. Please see Response 2.a.

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Question 3.

SoCalGas testimony at p. MF-17 states that “the enhanced CARE discount for the CARE fixed customer charge will be collected in transportation rates.” Please identify where this increase in transportation rates is calculated and evidenced in SoCalGas’s workpapers, in terms of the tab, row and column numbers.

Response

Please refer to “Revised_Ch_12a_SCG Rate Design Model _ 12-29-2025” workbook, tab “Rates”, rows 80-130, for fixed charge proposal refer to Scenario 12,13,14 (Columns U, V, W). All authorized residential revenue requirements that aren’t specifically allocated to the fixed charge, are left to be recovered through the volumetric portion of residential revenue. Estimated customer charge revenue is shown calculated in rows 80-90. Resulting volumetric revenues are shown in rows 129-130.

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Question 4.

In response to TURN DR 3, Question 11, SoCalGas stated that it plans to collect part of the discount on the CARE customer charge through PPPS rates and another portion through residential transportation rates. Is SoCalGas aware of any prohibition in statute and/or prior regulatory decisions which would prevent it from collecting its full proposed 50% CARE discount on the customer charge through PPPS rates? If so, please identify those statutes and/or decisions.

Response

SoCalGas does not propose changes to the 20% CARE discount as outlined in its tariff schedule G-CARE, California Alternate Rates for Energy (CARE) Program.¹ In fact, SoCalGas is not proposing any change to CARE program itself. SoCalGas proposes CARE enrollment to be used solely as an indicator. SoCalGas proposes to create an income differentiated fixed charge, using CARE enrollment as the proxy for determining which customers are eligible for the proposed lower fixed charge.

SoCalGas is not aware of any prohibition in statute and/or prior regulatory decisions which would prevent it from collecting its full proposed discount on the customer charge through PPPS rates.

¹ Available at: <https://tariffsprd.socalgas.com/view/tariff/?utilId=SCG&bookId=GAS&tarfKey=293>

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Question 5.

In response to TURN DR 3, Question 16, SoCalGas provided the usage per decile for Zone 1 customers (“TURN-003_Q8_16_Revised_SCG Fixed Cost Analysis_12-29-2025”, tab “SCG Bill Impact-per Deciles”, cells J30:S41 and J42:S53).

- a. Please confirm whether these quantities represent the average, median, or upper bound of each decile.
- b. Why did SoCalGas use usage data in rows labeled “class average” (cells J30:S41) to calculate non-CARE bill impacts, rather than non-CARE specific usage data?

Response

- a. The decile values are defined as the volume that a hypothetical customer at each decile point would use. For example, the volume for the 1st decile means 10 percent of customers have volumes below that level and 90 percent had volume above that level.
- b. The data in cells J30:S41 is specific to non-CARE customer decile usage. “Class Average” label in this instance is mislabeled and should be labeled as “non-CARE”.

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Question 6.

In response to TURN DR 3, Question 15, SoCalGas stated that it has not conducted an analysis of the impacts of its customer charge proposal based on income proxies.

- a. Has SoCalGas analyzed the impacts for medical baseline customers? If so, please provide that analysis.
- b. If not, please describe how SoCalGas anticipates its proposal would impact medical baseline customers across usage deciles.

Response

- a. SoCalGas has not conducted specific analysis on the bill impacts of the medical baseline customers.
- b. For customers eligible for the Medical Baseline Allowance, bill impacts would differ from those of non-medical baseline customers when monthly usage exceeds the baseline limits applicable to regular customers. Medical Baseline customers are typically allowed to consume a higher volume of therms at the lowest baseline rate.

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Question 7.

In response to TURN DR 3, Question 16, SoCalGas provided the usage per decile for Zone 1 customers (“TURN-003_Q8_16_Revised_SCG Fixed Cost Analysis_12-29-2025”, tab “SCG Bill Impact-per Deciles”, cells J30:S41 and J42:S53).

In an Excel workbook, please provide usage data in the same format for Zones 2 and 3. In other words, please provide the average customer usage for non-CARE and CARE customers separately, broken down by decile and month, in (a) Zone 2 and (b) Zone 3.

Response

Please find the usage per decile for Zone 1, Zone 2 and Zone 3 Excel workbook, “TURN-005_Ques_7-rate design dr scg decile-99th by zone” for CARE and non-CARE.

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Question 8.

In an Excel workbook:

- a. Please provide the usage data for Zones 1-3 discussed in Q7 above additionally broken down by ZIP code. In other words, please provide the average residential usage by non-CARE/CARE status, usage decile, and month, for each ZIP code in its service territory.
- b. For each ZIP code, please identify the corresponding baseline territory/territories.

Response

- a. Please refer to Excel workbook “TURN-005_Ques_8-rate design dr scg decile-99th by zip”.
- b. Please refer to Excel workbook “TURN-005_Ques_8-rate design dr scg decile-99th by zip”.

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Question 9.

As a follow-up to SoCalGas’s response to TURN DR 3, Question 7: SoCalGas testimony Ch. 12a at p. MF-9 discusses the Commission’s 2024 approval of an electric fixed charge in R.22-07-005. In the Decision (D.24-05-028) the Commission stated that “...this decision adopts income-graduated fixed charges that will make a significant contribution towards supporting electrification.”¹ The Commission directed the IOUs to educate customers on “Why and how the fixed charge will encourage the adoption of electrification technologies and associated reduced use of fossil fuels.”² The Decision also stated that “...the implementation of income-graduated fixed charges will lower the barrier to electrification for all customers on default rates across the state.”³

Based on these statements, would SoCalGas acknowledge that the Commission approved an electric fixed charge in part to encourage electrification (additional electricity use)?

Response

SoCalGas objects on the ground that the request calls for a legal conclusion and calls for speculation, and SoCalGas further objects on the ground that the Decision cited in the request speaks for itself. Subject to and without waiving the foregoing objections, SoCalGas would note that D.24-05-028 says what it says.