

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to  
Establish Policies, Processes, and  
Rules to Ensure Safe and Reliable Gas  
Systems in California and Perform  
Long-Term Gas System Planning.

Rulemaking 24-09-012  
(Filed September 26, 2024)

**JOINT RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY  
(U 904 G) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) ON  
ADMINISTRATIVE LAW JUDGES' RULING SEEKING DATA FROM GAS  
UTILITIES**

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Dated: January 13, 2025

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Pursuant to the November 22, 2024, Administrative Law Judges' Ruling Seeking Data From Gas Utilities (ALJ Ruling), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) submit the following responses.<sup>1, 2</sup> Specifically, SoCalGas and SDG&E provide the following:

- Response filed on May 20, 2022 in R.20-01-007 as a compliance filing
- Response filed on November 4, 2022 in R.20-01-007 as a compliance filing
- Supplemental Information described in Appendix A of the ALJ Ruling<sup>3</sup>

SoCalGas and SDG&E note that data in this response was provided in accordance with the direction provided in the ALJ Ruling and we have worked to align the respective data with that previously provided in 2022. This includes the resubmission of previously provided data consistent with, and which were subject to, the confidentiality determinations for customer data pursuant to the October 28, 2022, Administrative Law Judge's Ruling on Gas Utilities'

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<sup>1</sup> Pursuant to Rule 1.8(d) of the Commission's Rules of Practice and Procedure, SoCalGas has been authorized to submit this Joint Response on behalf of SDG&E.

<sup>2</sup> ALJ David Van Dyken partially granted the gas investor-owned utilities' joint motion to extend the submission date to January 13, 2025. See December 20, 2024, Email Ruling Partially Granting the Joint Investor-Owned Utilities' Motion for extension of Time for Data From Gas Utilities.

<sup>3</sup> See ALJ Ruling at 2-3.

Confidentiality Claims Concerning Customer Gas Consumption and Infrastructure Data and Order Requiring Resubmission of Data issued in the predecessor proceeding, R.20-01-007.

Additionally, Appendix B of the ALJ Ruling outlines the methodology underlying the direction to identify the top ten 200-mile tranches for SoCalGas and 70-mile tranches for SDG&E of highest risk mains in the response. In essence, the sizing for these tranches is based on an analysis of GRC workpapers and intends to approximate annual distribution mileage replacement rate (inclusive of mains and services). We highlight that this approach likely captures more mileage in each tranche than the actual amount likely to be replaced moving forward for at least two reasons. First, the analysis in Appendix B relies on a summation of both main and service replacement miles whereas the quantitative risk assessment data provided is only for mains. A given mileage of mains will almost universally net a greater mileage of total main and service replacement because these mains will have some level of appurtenant service replacements. Second, this analysis is based on 2021 figures and does not consider the potentially significant reductions in replacement program scale approved in our recent 2024 General Rate Case decision. We note these issues to the extent it may help to avoid misleading discussion or actions in this proceeding or otherwise. For example, if this data is intended to be used to identify potential opportunities for non-pipeline alternatives (NPAs), there is a reasonable chance it overstates the availability of these opportunities and could drive inefficient resources expenditures in light of opportunities with underlying funded pipeline investments.

Respectfully submitted,

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