BEFORE THE PUBLIC UTILITIES COMMISION 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

R.24-09-012

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE ASSIGNED COMMISSIONER'S RULING ISSUING SENATE BILL 1221 MAPPING DIRECTIONS TO UTILITIES

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Southern California Edison Company (SCE) respectfully submits the following Response in compliance with Ordering Paragraph 3 (OP 3) of the April 19, 2025 Assigned *Commissioner's Ruling Issuing Senate Bill 1221 Mapping Directions to Utilities* (Ruling).

I.

INTRODUCTION

As explained in greater detail below, in compliance with the Ruling, SCE prepared a map displaying the boundaries of its Catalina propane gas service area that includes city, county, and census tract boundary information and has made the map available as a downloadable file on SCE's website's Catalina webpage, www.sce.com/Catalina.

II.

BACKGROUND

On February 20, 2025, the Administrative Law Judge's Ruling on Senate Bill (SB) 1221 Mapping Staff Proposal and Directions to Utilities requested comments on Appendix A, Draft "Recommendations for SB 1221 California Natural Gas System Mapping" (Draft Staff Proposal) and Appendix B, Draft "Directions to Utilities, Including Information to be Provided for Comment" (Draft Directions). Among other things, the Draft Staff Proposal stated that the focus of the report and requirements was directed on California's four largest gas utilities, Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southwest Gas.¹ The Draft Staff Proposal concluded that the remaining three investor-owned gas utilities - Alpine Natural Gas, West Coast Gas, and SCE as a provider of propane gas on Catalina island (collectively the small gas utilities) - were much smaller and did not propose that the small gas utilities provide maps or further discuss them in the report.²

On March 11, 2025, The Utility Reform Network responded in its Opening Comments that the Commission should reconsider requirements for the small gas utilities because SB 1221 applies to all gas corporations.³ TURN suggested that "[w]hile smaller utilities may not need to produce highly detailed maps, they should at least provide service territory boundaries to ensure comprehensive statewide mapping and to facilitate showing overlapping electric or gas provider area boundaries."⁴ In agreement with TURN, on March 18, SCE replied that the Commission should require smaller gas utilities to produce maps but with certain exemptions proposed in the Staff Proposal, resulting in less detailed maps without user guides and map updates.⁵

On April 18, 2025, the Commission issued the Ruling and its Appendix A, which directs that "[b]y July 1, 2025, other small gas utilities other than PG&E, SoCalGas, SDG&E, and Southwest Gas that serve retail customers in California shall provide maps showing their gas utility service area boundaries, as downloadable geospatial files, and may optionally provide any of the other information required of PG&E, SoCalGas, SDG&E, and Southwest Gas."⁶ The Ruling clarifies that "maps shall be provided as downloadable files rather than live webpages."⁷

 $[\]underline{1}$ Draft Staff Proposal, p. 9.

 $[\]frac{2}{Id}$.

<u>3</u> TURN Opening Comments, pp. 4-5.

 $[\]underline{4}$ Id.

⁵ SCE Reply Comments, pp. 2-3.

 $[\]underline{6}$ Ruling, OP 3.

⁷ Ruling, p. 9.

SCE HAS COMPLIED WITH THE RULING AND MAKES ITS MAP AVAILABLE ON SCE.COM

In compliance with the Ruling, SCE prepared a map displaying the boundaries of its Catalina propane gas service area. SCE's map also includes city, county, and census tract boundary information. SCE collaborated with the other gas utilities on formatting and symbology to support consistency where possible. However, there are variations due to differences in the downloadable geospatial files used by SCE and ArcGIS formats used by the larger gas utilities. SCE provides propane gas service to the city of Avalon, Catalina and therefore there is an overlap in the city and SCE's service area boundaries. SCE's map is available as a downloadable zipped Keyhole Markup Language (KML) file, referred to as "KMZ" format, on SCE's website's Catalina webpage, which is available at www.sce.com/Catalina.

IV.

CONCLUSION

In compliance with the Ruling, SCE invites parties to visit <u>www.sce.com/Catalina</u> to access a downloadable version of SCE's map.

Respectfully submitted,

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