

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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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 OPENING COMMENTS OF SOUTHERN CALIFORNIA GAS COMPANY  
(U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), AND SOUTHWEST  
GAS CORPORATION (U 905 G) ON ADMINISTRATIVE LAW JUDGE'S RULING ON  
SB 1221 MAPPING STAFF PROPOSAL AND DIRECTIONS TO UTILITIES**

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Pursuant to Administrative Law (ALJ) Judges Robyn Purchia’s and David Van Dyken’s February 20, 2025, Ruling on SB 1221 Mapping Staff Proposal (Staff Proposal) and Directions to Utilities, Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southwest Gas Corporation (Southwest Gas), collectively the Joint Utilities, hereby submit these joint opening comments.<sup>1</sup> Pursuant to Rule 11.6, the ALJs’ February 27, 2025 Email Ruling (R.24-09-012) Partially Granting the Joint IOUs Motion for Extension of Time to Provide Comments granted a one-week extension for opening and reply comments to be due respectively on March 11, 2025, and March 18, 2025.

**I. INTRODUCTION**

The Joint Utilities appreciate the opportunity to provide comments on the Staff Proposal, and we look forward to collaborating with the Commission and stakeholders to timely accomplish the statutory requirements of the SB 1221 program and the integration of non-pipeline alternatives more broadly into long-term gas planning. The Joint Utilities focus these comments on foundational issues that should be addressed as the Commission considers the type, extent, and recipients of sensitive gas infrastructure information that it will direct to be provided in order to timely meet the statutory deadlines of SB 1221 and develop a framework for potential pilots.

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<sup>1</sup> Pursuant to Rule 1.8(d) of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedures, counsel for SoCalGas was authorized to submit these Joint Opening Comments on behalf of SDG&E and Southwest Gas.

The current construct of the Staff Proposal raises several threshold concepts that should be addressed as the mapping process proceeds: (1) there are significant risks associated with publishing to an internet accessible website the detailed, specific, and wide-ranging data envisioned in the Staff Proposal; (2) the Staff Proposal efforts extend beyond the expressed and anticipated requirements of SB 1221, such that it would be infeasible to produce by the statutory deadline of July 1, 2025; (3) on balance, compiling and disclosing sensitive state energy infrastructure information is of unclear relevance and value and instead the focus should be on facilitating directional information to help identify possible pilot participants under SB 1221; and (4) executing on the Staff Proposal, specifically, developing and maintaining such a mapping program, will be time and resource intensive and costly.

Notwithstanding these concerns, the Joint Utilities believe that it will be possible to provide a map to the Commission in alignment with both the statutorily required scope and timing prescribed by SB 1221, but this will require significant moderation of the Staff Proposal. The Joint Utilities are unable to provide an exhaustive and detailed review of the potential opportunities and challenges associated with the full range of data requested in the Staff Proposal given the timeline to provide these comments. The Joint Utilities nonetheless reiterate their commitment to work with the Commission to provide constructive feedback on the practicalities, risks, costs, timeline, and value associated with the data being requested, to help inform how a broader mapping approach can be developed to meet the required scope and timing of SB 1221.

## **II. DISCUSSION**

### **A. The Staff Proposal Raises Significant Safety and Security Concerns that Must be Assessed Before Directing Detailed Publication of the State's Gas Distribution System**

Broad publication and public access to the sensitive critical energy infrastructure information as contemplated in the Staff Proposal carries significant safety and security risks and – to our understanding – is unprecedented. The Joint Utilities are committed to the safety of our systems, customers, employees, contractors, and the communities we serve. To increase broader shared understanding and collaboration towards shared goals under SB 1221, the Joint Utilities identify several examples of the security and safety concerns. As noted extensively in R.20-01-007, the Joint Utilities and the Commission have a shared priority for safe and reliable essential gas service in California which the Joint Utilities strongly believe hinges on, *inter alia*,

protecting sensitive information relating to our gas system infrastructure in a prudent manner. It is in this context the Joint Utilities wish to frame our concerns and recommendations.

### **1. Specific Examples of Safety and Security Concerns**

The risks associated with disclosing the gas infrastructure information as contemplated in the Staff Proposal, especially publicly and via an online portal (including one that does not have basic controls such as requiring users to register) would be significant. Although it is reasonable for the public to presume natural gas infrastructure exists in communities where natural gas service is available, limited insight is readily available as to the exact location or magnitude of this infrastructure because it is underground. Conversely, disclosing information on the exact location and magnitude (e.g., diameter, pressure) of gas infrastructure is an entirely different magnitude of disclosure. Public disclosure of this granular information risks nefarious actions by bad actors looking to attack the gas system to leverage large volumes of combustible fuel to drive destruction, and/or remove major arterial energy infrastructure from service potentially impacting millions of Californians for potentially prolonged periods of time. Disclosing additional information, such as risk assessments of gas pipelines, will likely exacerbate these risks by highlighting potential vulnerabilities and/or areas of enhanced consequence among the gas infrastructure.

As another example, disclosing emergency valve locations could provide information to bad actors to engage with such valves to cause gas service outages (on a potentially widespread scale) that would result in costly and long-lasting service restoration efforts leaving customers without gas for days to weeks or longer, negatively impacting reliability and adding to energy service costs for ratepayers. Improper opening of valves could result in over-pressurization of parts of the gas system which could have dire consequences described further below or could result in gas being present in unexpected areas creating risks for both utility personnel and the public. Aside from operating these valves, bad actors could also tamper with or sabotage valves to prevent them from being operated when they may be needed, delaying emergency response and/or exacerbating emergency situations, such as deenergizing the local gas system during wildfire events.

In justifying the need to provide emergency valve locations, the Staff Proposal states that, “Mapping these valves would help contextualize the system and which parts of it are isolable at a

larger scale or in case of an emergency event.”<sup>2</sup> The Joint Utilities provide some clarifications to this assumption. Generally speaking, in order to safely and systematically isolate parts of the gas system, these valves would need to be operated in concert and with assessment, review, operation and/or direction provided by qualified engineers or other experts. Disclosing the location of these valves introduces the risk of providing infrastructure data to unqualified recipients that do not have the operational and technical education, training, and experience on how this data might be prudently and safely used. Again, on balance, publishing these sensitive locations to the public introduces significant safety, reliability and cost risks while providing little, if any, value in terms of reviewing investments in and optimizing gas systems.

Importantly, the gas distribution system serves critical facilities including government, fire and police, hospitals, defense manufacturers and the like. Similarly, there are sections of the distribution system that serve electric generators that provide power to the electric grid. Aside from any customer confidentiality concerns, making infrastructure information readily available regarding the location of large customers and upstream gas infrastructure, let alone isolation valves, arms potential bad actors with more knowledge about how to interrupt gas services to these critical and sensitive customers.

Another potential safety risk that would be exacerbated by the publication of gas infrastructure data is related to tampering with regulator stations. These facilities maintain service to potentially thousands of downstream customers, and bad actors could de-energize single facilities that could cause widespread service outages. Even more problematically, tampering with a single regulator station to disable or modify its pressure control functionality could cause all downstream facilities to experience significant overpressures, which could lead to damage or destruction of utility and customer property and even serious injuries or fatalities. The 2018 Merrimack Valley overpressure resulted in one fatality and the hospitalization of many others along with significant property damage and exemplifies the potential consequences of such an over pressurization.<sup>3</sup>

In addition to bad actor threats, this proposal also introduces risks associated with supplying unqualified members of the public with this data. One example of such risk is if someone, potentially even a well-intentioned first responder or member of the public during an

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<sup>2</sup> Staff Proposal at Section 3.2.1.5.

<sup>3</sup> <https://www.nts.gov/investigations/AccidentReports/Reports/PAR1902.pdf>.

emergency, were to utilize data available in these maps to identify and operate an isolation valve or valves. This would be problematic for a number of reasons including that operating these valves in a safe and appropriate manner requires specific training and qualification, and on the rare occasion that isolation using these valves is deemed necessary, it is typically a complex, case-by-case operation involving multiple valves and requiring detailed coordination with gas operations, field, and engineering teams. Moreover, the gas system is not exhaustively instrumented such that utilities would know immediately when or where a valve has been operated. Due to the interconnected nature and operational and hydraulic complexity of a gas distribution system, and the latency with data from devices like smart meters, there is a high likelihood that valves could be inappropriately and unsafely operated by a third party well before qualified utility personnel become aware of any abnormal operating conditions and are able to troubleshoot them to identify the situation. This lag in identifying such an event can allow the consequences of such valve operation to cascade into fairly widespread outages, be counter to the utility's efforts to mitigate and control the situation and damage gas utility and/or customer property.

A second, potentially more common example of non-bad actor risk is that publishing these maps erodes the perceived necessity of calling 811/requesting the location and marking of gas facilities prior to excavating – the primary defense the gas utilities have against the leading threat to pipelines – third-party damage. Providing such exhaustive gas infrastructure maps to the public is likely to give certain contractors, homeowners, or others performing work a false confidence that their excavation projects do not conflict with underground gas infrastructure, encouraging them to proceed without proper consultation and increasing the risk of gas pipelines being struck. At a minimum, we recommend the Commission confer with the California Underground Facilities Safe Excavation Board to determine and mitigate the potential excavation risks associated with the Staff Proposal prior to obligating the gas utilities to take any action on the Staff Proposal. The California Underground Facilities Safe Excavation Board was created by the Dig Safe Act of 2016 and exists to improve public and worker safety by facilitating communication and learning among excavators and the operators of subsurface installations, by investigating accidents to determine their causes, and by developing solutions to

improve safety outcomes. The Joint Utilities believe further consultation on this important matter is crucial to support transparency and best practices in public and infrastructure safety.<sup>4</sup>

## **2. Broader Risks with Disclosing State Energy Infrastructure**

According to the Department of Homeland Security’s Biennial National Strategy for Transportation Security:

The national pipeline system and associated facilities are vulnerable to terrorist and nation-state attacks largely due to their stationary nature, the volatility of transported products, and the dispersed nature of pipeline networks spanning urban and outlying areas...

From a design perspective, some pipeline assets are more attractive to terrorists simply because of the transported commodity and the impact an attack would have on national security and commerce. Minor pipeline system disruption may result in commodity price increases while prolonged pipeline disruptions could lead to widespread energy shortages...

From a physical threat perspective, Animal Rights/Environmental Violent Extremists (AREVEs) and Anarchist Violent Extremists (AVEs) are the primary threat actors interested in targeting pipelines in the United States. In January 2021, a climate change activist published the book, ‘How to Blow Up a Pipeline’ which encouraged sabotage against hazardous liquid/natural gas pipelines and discouraged pacifism in the fight against climate change. In a subsequent appearance, the activist further encouraged targeted sabotage, including the destruction or neutralization of equipment and property. These violent extremists will continue to use a variety of tactics, including criminal acts such as lower-impact sabotage and vandalism, to counter pipeline construction projects.<sup>5</sup>

The Transportation Security Administration’s (TSA) Pipeline Security Guidelines<sup>6</sup> include directions on “TSA Notification Criteria,” which outlines conditions for which “As the lead Federal agency for pipeline security, TSA requests to be notified of security incidents that

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<sup>4</sup> The California Underground Facilities Safe Excavation Board has an obligation to collaborate with the CPUC, among others, in their oversight of the federally-mandated damage prevention programs. Please see Policy A-05 available here: <https://energysafety.ca.gov/wp-content/uploads/docs/underground/policy-a-05-coordination-with-state-federal-agencies.pdf>.

<sup>5</sup> DHS/TSA Biennial National Strategy for Transportation Security, Appendix C: Surface Security Plan, page 88. Available here: [https://www.dhs.gov/sites/default/files/2023-06/NSTS\\_Appendices\\_Final\\_4\\_18\\_23\\_508C.pdf](https://www.dhs.gov/sites/default/files/2023-06/NSTS_Appendices_Final_4_18_23_508C.pdf).

<sup>6</sup> Transportation Security Administration Pipeline Security Guidelines, Appendix B/Page 31. Available here: [https://www.tsa.gov/sites/default/files/pipeline\\_security\\_guidelines.pdf](https://www.tsa.gov/sites/default/files/pipeline_security_guidelines.pdf). This guide is “applicable to operational natural gas and hazardous liquid transmission pipeline systems, natural gas distribution pipeline systems, and liquefied natural gas facility operators.”



are indicative of a deliberate attempt to disrupt pipeline operations or activities that could be considered precursors to such an attempt.” One such criteria is “Theft or loss of sensitive security information (detailed pipeline maps, security plans, etc.).” While the Staff Proposal does not represent a theft or loss of sensitive security data as described by the TSA here, it would represent a loss of control over sensitive security data. Making this data fully available as proposed not only increases risk but also eliminates an important threat identification and control opportunity the TSA relies on in monitoring potential bad actor activity.

The Joint Utilities are particularly sensitive to bad actor risks that would be exacerbated by the Staff Proposal given that the Southern California region includes two of the country’s largest cities, numerous military bases and other sensitive and critical facilities, and the nation’s largest manufacturing center. California and the Los Angeles area in particular will be spotlighted as a host to several international scale events in the coming years, including the 2026 FIFA World Cup, 2027 National Football League Super Bowl, and the 2028 Summer Olympics. These events have been or are likely to be designated as National Special Security Events (NSSEs) by the United States Department of Homeland Security, which causes the United States Secret Service to take the lead on security planning associated with the event. An NSSE is an event of national or international significance that has the potential to be targeted by terrorism or other criminal activities. It is likely that other NSSEs will be hosted within SDGE and SoCalGas’ service territory due to Southern California’s prestige, services, and ability to host national and international events. The posting of SoCalGas and SDGE’s infrastructure on open-source platforms will compromise and complicate local, state, and federal law enforcement's security planning efforts, enabling potential suspects to remain anonymous while conducting their preplanning activities.

Aside from direct physical threats to pipelines being exacerbated if the Staff Proposal is maintained, cybersecurity threats may also be elevated, and bad actors may be armed with better information to target such attacks. Various cybersecurity threats exist and are relevant here, including ransomware attacks such as the recent and consequential attack on Colonial Pipeline in 2021, as well as “man-in-the-middle” attacks where bad actors intercept active user sessions and manipulate data resulting in damage to companies’ reputations or worse. Notably, the Staff

Proposal would be inconsistent with the “Baseline Security Measures” for Access Control recommended in the TSA’s Pipeline Security Guidelines, as shown in the table below:<sup>7</sup>

**Table 3: Baseline and Enhanced Cyber Security Measures**

	<b>Baseline Security Measures</b>	<b>Enhanced Security Measures</b>
<b>Identify</b>	<b>Risk Assessment</b>	
	Establish a process to identify and evaluate vulnerabilities and compensating security controls.	Ensure threat and vulnerability information received from information sharing forums and sources are made available to those responsible for assessing and determining the appropriate course of action.
<b>Protect</b>	<b>Access Control</b>	
	Establish and enforce unique accounts for each individual user and administrator, establish security requirements for certain types of privileged accounts, and prohibit the sharing of these accounts.  In instances where systems do not support unique user accounts, then implement appropriate compensating security controls (e.g., physical controls).	Restrict user physical access to control systems and control networks through the use of appropriate controls. Employ more stringent identity and access management practices (e.g., authenticators, password-construct, access control).
	Ensure that user accounts are modified, deleted, or de-activated expeditiously for personnel who no longer require access or are no longer employed by the company.	
	Establish and enforce access control policies for local and remote users. Procedures and controls should be in place for approving and enforcing policy for remote and third-party connections.	Monitor physical and remote user access to critical pipeline cyber assets.
	Ensure appropriate segregation of duties is in place. In instances where this is not feasible, apply appropriate compensating security controls.	
	Change all default passwords for new software, hardware, etc., upon installation. In instances where changing default passwords is not technically feasible (e.g., a control system with a hard-coded password), implement appropriate compensating security controls (e.g., administrative controls).	Employ mechanisms to support the management of accounts.

**3. The Previous Consideration of Confidentiality and Mapping Issues in this Proceeding and Others are Distinguishable**

Respectfully, the Staff Proposal relies on several problematic premises to rationalize the publication of natural gas system data, including reference to an October 2022 ALJ Ruling on

<sup>7</sup>Transportation Security Administration Pipeline Security Guidelines, Table 3/Page 24. Available here: [https://www.tsa.gov/sites/default/files/pipeline\\_security\\_guidelines.pdf](https://www.tsa.gov/sites/default/files/pipeline_security_guidelines.pdf).”

Confidentiality (Confidentiality Ruling),<sup>8</sup> and analogizing the existence of electric utility public integrated capacity analysis (ICA) maps and Pipelines and Hazardous Materials Safety Administration (PHMSA) required gas transmission pipeline maps. The Staff Proposal’s citation to other available energy infrastructure maps to create a precedent for the proposed maps are not analogous to the gas system and this specific request. As compared to the ICA maps, which provide mapping of electrical infrastructure that is predominantly above ground and readily apparent to the public, the Staff Proposal would require a significant level of incremental disclosure of information pertaining to underground natural gas infrastructure which is not readily or publicly available to anywhere near the same degree. Additionally, while the PHMSA required natural gas transmission pipeline maps do provide general location information for this gas infrastructure, these maps are scale dependent, meaning that if users attempt to zoom in to too great a degree, mapped features are eliminated to reduce risks associated with disclosing the exact location of critical energy infrastructure. The Staff Proposal, in comparison, contemplates including certain attributes that “will show after sufficiently zoomed in,” potentially presuming a level of accuracy and precision which is unprecedented, dangerous, and of unclear purpose or need. If the Commission does require the gas utilities to publish gas asset data on maps as contemplated in the Staff Proposal, which the Joint Utilities strongly advise against, it will be critical that exact location data is unavailable or obscured. In addition to providing at least some risk reduction against bad-actors, this can also help to dissuade the use of these maps in lieu of calling 811.

As it relates to the Confidentiality Ruling, the Joint Utilities the requirements outlined in the Staff Proposal were dissimilar to those contemplated there. The Confidentiality Ruling denied confidential treatment of data on the basis that it was generalized at a census tract level.

Two informative extracts from the Confidentiality Ruling are highlighted below:

This Ruling rejects Sempra’s claim that the protections in CEII apply to Sempra’s infrastructure information at issue. CEII does not apply to information concerning only the ‘general location of the critical infrastructure,’ which is what Sempra submitted. None of the gas infrastructure data at issue here includes addresses or precise locations. The greatest level of geographic detail requested and provided is data by census tract and zip code. The average census tract in California houses more than 4,000 people across 17 square miles. Given that only the “general location” of

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<sup>8</sup> [confidentialityruling10282022.pdf](#).

infrastructure was provided, Sempra's CEII confidentiality claim lacks merit.<sup>9</sup>

The public interest in withholding the information chiefly concerns public safety. But given the low granularity of the subject information – i.e., precise locations are not at issue – the risk to public safety associated with disclosure appears low. Thus, the public interest in disclosure substantially outweighs Sempra's alleged private economic interest or the public interest served by withholding the infrastructure information at issue.<sup>10</sup>

The data being contemplated in the Staff Proposal is not of the same type, extent, and granularity of the previous responsive data. Thus, the Staff Proposal reliance on the findings and direction of the Confidentiality Ruling is not on point. The Staff Proposal contemplates a level of disclosure and specificity that goes far beyond generalized, aggregate census tract-level data. For instance, "Staff recommend that gas utilities include all major categories of gas distribution infrastructure on their maps. These include gas distribution mains, distribution regulator stations, and some valves not located at meters"<sup>11</sup>, "The gas distribution system also features various other valves not located at meters, such as emergency shutoff valves. Mapping these valves would help contextualize the system and which parts of it are isolable at a larger scale or in case of an emergency event"<sup>12</sup> and "Each gas utility's...map... shall default to show: Gas distribution mains, color-coded by highest risk score locations (will show after sufficiently zoomed in)... Overlaid on a street map."<sup>13</sup> These requirements clearly extend well beyond the generalized and aggregated, unmapped information at hand in the ruling.

We acknowledge the Staff Proposal does take some care to navigate the tension between inappropriately disclosing sensitive and confidential customer information when suggesting to map large meter locations with certain attributes, however, the Joint Utilities remain concerned with the disclosure of customer information with mapping of even these features and believe the Commission should engage natural gas customers prior to mandating this disclosure. It may be more appropriate to directly use the California Air Resources Board Pollution Mapping Tool the

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<sup>9</sup> Id. at page 7.

<sup>10</sup> Id. at page 10

<sup>11</sup> Staff Proposal at 12.

<sup>12</sup> Id. at 16.

<sup>13</sup> Staff Proposal Appendix B – Directions to Utilities, Including Information to be Provided, at page 5.

Staff Proposal references rather than introducing new gas infrastructure data and presuming there is no incremental disclosure or risk in doing so.

**B. The Staff Proposal Is Misaligned with The Scope of And Timely Compliance with SB 1221**

The Joint Utilities are concerned the Staff Proposal and Mapping Requirements presented in this Ruling are misaligned with and significantly expansive of relevant statutory language as well as established confidentiality principles and have outlined several specific concerns below. If the Commission does intend to engage in this type of expansion and interpretation of legislative direction in establishing these mapping requirements, we believe it is more appropriate to provide such policy direction via a Commission decision. Such policy setting should appropriately involve robust and thorough consideration of the issues from decision makers at the Commission before such a critical decision. Beyond procedural transparency, the Staff Proposal introduces safety risks without clearly defined expected benefits or value and potentially create significant costs for the Joint Utilities and their ratepayers impacting service affordability, including requirements rendering completion by July 1, 2025, infeasible.

The Joint Utilities’ review of the Commission Staff recommendations finds that the Staff Proposal does not align with PUC 661(a). First, code specifies, “each gas corporation shall submit *to the commission* a map that includes...”(emphasis added). The Joint Utilities, who in part supported SB 1221 as a bill,<sup>14</sup> understand this language to provide for a submission from the utilities to the Commission with sufficient confidentiality protections in place subject to with Decision (D.) 21-09-020 and General Order (GO) 66-D. The Staff Proposal has interpreted and expanded this legislative direction to include broad publication of these detailed maps unbound by confidentiality and safety and security concerns.

Second, SB 1221 specifies that these maps should include “The location of all potential gas distribution line replacement projects identified in its distribution integrity management plan and any foreseeable gas distribution pipeline replacements.” This requirement is clearly aimed at identifying potential and foreseeable *projects* for the purposes of identifying potential opportunities to implement zonal decarbonization pilots. The Staff Proposal would essentially result in an overreach by extending these provisions to include a broad swath of gas assets and

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<sup>14</sup> Southern California Gas Company supported SB 1221, as evidenced most recently in the Senate Floor Analysis dated 8/31/24 and available here: [https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill\\_id=202320240SB1221#](https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202320240SB1221#).

attributes, including mapping nearly all of the gas distribution system and providing risk scores regardless of whether these assets are predicted to be replaced with any degree of certainty, on any reasonable timeframe, or at all. This would create a substantial and major novel unfunded mandate on gas utilities with no clear explanation of expected benefits. Given that we expect ratepayer funding for this work, as described in SB 1221, the Joint Utilities are concerned that incremental requirements will negatively impact affordability, and the Commission should clearly identify the resulting benefits and value such requirements provide in relation to the costs.

Additionally, by augmenting the requirements of SB 1221 to go so far beyond identifying potential and foreseeable projects that could help inform non-pipeline alternative (NPA) and zonal decarbonization opportunity identification, the Staff Proposal is likely to either provide limited direction, or even distraction to stakeholders interested in advancing these solutions, resulting in unclear direction and scope of SB 1221 and an ultimate ineffective and inefficient of ratepayer funding. We therefore recommend the Staff Proposal instead should be developed as a more precise, targeted approach aimed at identifying potential candidate projects to test NPAs against and assist with defining priority decarbonization neighborhoods. We acknowledge the mapping requirements to allow for inclusion of “Any additional information required by the commission.” The Joint Utilities submit that it would be unreasonable for this extent and type of information to be embedded in a statutory compliance which must be delivered to the Commission by July 1 with the Staff Proposal so far beyond what we understand to be contemplated by SB 1221, being issued in mid-February.

Further, as explained in our Joint Response to the ALJ’s Ruling Seeking Data from Gas Utilities submitted to the docket on January 14, 2025, the methodology the Commission has derived to approximate potential DIMP projects is not aligned with operational realities and likely captures far more mileage than the actual amount likely to be replaced moving forward.<sup>15</sup>

As a practical matter, several of the more than 70 data sets being requested are currently available in the Joint Utilities mapping models, however, a significant remainder of the requested data is not readily available and would require substantial time and resources to develop to the extent a field is possible to produce at all. It is also unclear to the Joint Utilities whether the

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<sup>15</sup> See Response at page 2 for further explanation, available here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M553/K678/553678578.PDF>.

approach proposed to provide a tremendous amount of relatively raw system data will actually be useful in ascertaining potential and foreseeable distribution projects as envisioned by SB 1221, or meaningful in supporting the Commission’s task of designating priority neighborhood decarbonization zones. It is important that the Commission consider these costs in balance with the expected benefits of completing this work, and it is crucial that the Commission expeditiously provide an incremental funding mechanism that provides the utilities with assurance that costs of this work will be recovered completely and timely.

### **C. Feasibility Concerns and Recommendations**

In addition to the Staff Proposal’s inappropriate expansion of statute, the expectations around data and tool availability and timing are unreasonable and would be impossible to deliver on in certain cases. While the Joint Utilities have made a reasonable attempt to review the extensive suite of data requirements proposed, it has not been possible to conclusively study the requirements given the breadth of the proposal and short timeline for comments. We attempt to summarize some initial reactions here in comments, and we request to be given the opportunity to collaborate with Commission staff to discuss the feasibility of their proposal in greater detail and be provided sufficient time to study the request and all its implications.

One general reaction to this proposal is that it would require the buildout of a new platform, which will not be feasible by July 1, 2025. While detailed analysis is pending, it is our initial impression that a significant amount of the data being requested is not available currently. Even data that may seem like it is relatively easily available may not currently use GIS as the system of record, and a significant effort will be needed to incorporate this data into GIS in the short time frame being suggested. Significant additional work is required to make all of this data ready in a quality manner, including activities like sourcing, structuring, analyzing and quality control. Relatedly, and crucially, the Commission has yet to establish a funding source or cost recovery mechanism for these substantial new activities, among other needs expected to emerge related to SB 1221 or otherwise in this proceeding. As an example, it is our understanding that the cost and timeline to establish the electric ICA maps, an analogy drawn explicitly to this request in the Staff Proposal, were significantly in excess of what has been budgeted here. According to our review of Southern California Edison Company’s (SCE) 2025 General Rate Case Application,<sup>16</sup> the capital costs associated with creating the DRP External Portal were

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<sup>16</sup> 2025 GRC Chapter on “Grid Modernization, Grid Technology and Energy Storage” Table II-8.

incurred over a multi-year period and were approximately \$12 million (2019-2023 recorded), and SCE is forecasting investing between \$1.5 and 2 million dollars annually moving forward to maintain the Portal. This is compared to *zero* funding contemplated in the Staff Proposal and an unrealistic timeline of approximately three months – assuming the Staff Proposal could be finalized expeditiously after reply comments are submitted.

If the Commission were to adopt this Staff Proposal without change, which the Joint Utilities strongly oppose given its current expansive scope and public disclosure requirements, it would be crucial to both revisit expectations on scope and schedule, and to provide for an immediate funding mechanism with assurance of timely and complete cost recovery for the utilities to support this effort.

### **III. CONCLUSION**

While this Opening Comment from the Joint Utilities does have a strong focus on the risks and challenges associated with the Staff Proposal as currently drafted, we reiterate our commitment to collaborate with the Commission to enable compliance with SB 1221, while providing necessary and valuable data and insights into the gas system to advance SB 1221, non-pipeline alternative integration more broadly, and long-term energy system transition planning overall. We remain concerned about the unnecessary and imbalanced safety, affordability, and other risks we believe this Staff Proposal introduces, and given the relative dearth of consideration of these risks in the Staff Proposal, we believe these risks must be acknowledged and understood to better inform prudent decision making. The utilities ultimately bear the responsibility to operate and maintain the safety of our system, employees, and the public while managing risk as a prudent operator. We hope our identification of risks and safety concerns discussion does not present as unwillingness to engage constructively on this important matter. To the contrary, we continue looking forward to work with Commission Staff to define a practical and appropriate path forward that maximizes value while minimizing risk and cost.

Accordingly, we believe the path forward from here should include a revised and heavily moderated proposal focused on the critical needs to directly advance the requirements and goals of SB 1221, which is cognizant of the practicality of meeting the July 1 deadline and the plethora of risks and costs associated with publicly disclosing natural gas infrastructure information to the detailed degree the Staff Proposal articulates. Moving beyond SB 1221 compliance, the Joint Utilities look forward to engaging with the Commission to discuss the specific purpose, need,



benefits, value, costs, practicality, time requirements, and other factors involved in supplementing these maps with additional information for the Commission's use.

Respectfully submitted,

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