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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

**ASSIGNED COMMISSIONER'S RULING ISSUING SENATE BILL 1221
MAPPING DIRECTIONS TO UTILITIES**

In light of party comments and due to the legislative deadline, I revise the requirements gas utilities must follow when they submit their maps to the Commission by July 1, 2025, pursuant to Public Utilities (Pub. Util.) Code Section 661(a) and require a limited set of data, described below, on maps hosted by utilities by July 1, 2025. This data focuses on basic compliance with Pub. Util. Code Sections 661(a)(1)-(3).

Pursuant to the Commission's authority in Pub. Util. Code Section 661(a)(4), I also require gas utilities to map electric information that is already publicly available, as described below. Any additional information the Commission may require under this legislative authority, including the possibility of an additional map iteration or ruling requesting data, will further support the process of the Commission's determination of priority neighborhood decarbonization zones by January 1, 2026, and implementation of Senate Bill (SB) 1221. Requirements may be revised for later years.

1. July 1, 2025, Mapping Requirements

Gas utilities shall submit maps by July 1, 2025. The information required on these maps includes the information required by Pub. Util. Code Section 661(a)(1)-(3): potential and foreseeable gas distribution replacement projects for the next ten years; jurisdictional boundaries, including tribal, and census tracts; and disadvantaged community information. It also includes specified electric capacity information from existing maps. It does not include priority neighborhood decarbonization zones, which have yet to be defined, or other information which may be useful in defining them. A complete set of directions for July 1, 2025, is provided in the attached Appendix A, “Directions to Utilities for Compliance by July 1, 2025.”

Gas utilities’ updates on their progress towards July 1, 2025 maps shall be submitted by May 7, 2025, instead of April 1, 2025, as previously required.

Utilities’ mapping update	May 7, 2025
Utilities submission of initial public SB 1221 maps	July 1, 2025

2. Potential and Foreseeable Pipeline Replacement Projects

The Staff Proposal identifies risk scores as an existing set of information that represents foreseeable gas distribution replacement.¹ Instead of risk scores, Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), and Southwest Gas Corporation (Southwest Gas) propose

¹ CPUC Energy Division Staff Proposal, *Recommendations for SB 1221 California Natural Gas System Mapping*, issued as an attachment to *Administrative Law Judge’s Ruling on Senate Bill 1221 Staff Proposal and Directions to Utilities*, requesting comment, on February 20, 2025.

providing “an indicative 10-year outlook of planned and foreseeable gas distribution projects based on their application of best available risk modeling, foreseeable other projects, and current funding levels for distribution replacement work, in the form of a confidential map submitted to the Commission by July 1, 2025.”² The Sierra Club and Natural Resources Defense Council also propose requiring forecast replacement years.³ Pacific Gas and Electric Company (PG&E) did not express opposition to the risk score approach, but noted that PG&E does not wish to “re-litigate the risk methodology used by the utilities” and that “SB 1221 requires the gas utilities to identify their priority and foreseeable gas pipeline replacement projects.”⁴

I appreciate the utilities’ willingness to provide maps of a reasonable interpretation of “any foreseeable gas distribution pipeline replacements,” pursuant to Pub. Util. Code Section 661(a)(1). Therefore, I direct each gas utility to forecast and map ten years⁵ of foreseeable gas distribution pipeline replacement projects, consistent with their existing annual project selection methods and gas distribution pipeline replacement rates.⁶ This is a total of at least 2,000 miles for PG&E and for SoCalGas; 700 miles for SDG&E; and 300

² Joint Utility Reply Comments at 8.

³ Sierra Club and NRDC Opening Comments at 3-4.

⁴ PG&E Reply Comments at 5-6.

⁵ January 1, 2026, through December 31, 2035.

⁶ Gas utilities discuss their existing methods in their “Risk Assessment Methods” documents and “Supplemental Data” spreadsheets, tab “Program Specific,” filed in response to *Administrative Law Judge’s Ruling Seeking Revised Data from Gas Utilities* in R.20-01-007, November 4, 2022, and in their general rate cases.

miles for Southwest Gas.⁷ These mileage totals are based on utilities' annual replacement rates, as discussed in the Staff Proposal.⁸ Moreover, they will support data usability because the same mileage was reported for risk scores at a census tract level in response to the November 22, 2024 Administrative Law Judge ruling in this proceeding. The utilities shall indicate the forecasted commencement year for each project, which may extend beyond ten years as needed due to variations in calculation methods. These forecasts are not binding but rather are expected to represent the utilities' best estimate of future gas distribution replacement projects.

In addition to "foreseeable gas distribution pipeline replacements," SB 1221 requires gas utilities to map "all potential gas distribution line replacement projects identified in [a gas utility's] distribution integrity management plan." For maps due on July 1, 2025, "potential gas distribution line replacement projects" are the same as foreseeable gas distribution replacements described above. Gas utilities will identify these projects using existing methods, which must include implementation of their Distribution Integrity Management Plans. This means, at this time, gas utilities need not map mains and services subject to replacement per Distribution Integrity Management Plans *after* the replacements described above.

3. Jurisdictional Boundaries and Census Tracts

For the maps submitted by July 1, 2025, gas utilities shall include:

⁷ A typo in the February 20 "Draft Directions to Utilities" referred to 2,000, 700, and 300 "segments," (Appendix B, p. 7) when it should have referred to 2,000, 700, and 300 "miles," respectively.

⁸ Staff Proposal, section 3.2.2. "Gas Infrastructure Replacement," including discussion of miles per year in sections 3.2.2.3 "Gas Main Replacement" and 3.2.2.4 "Mapping Recommendations."

- (1) jurisdictional boundaries for cities, counties, and census tracts pursuant to Pub. Util. Code Section 661(a)(2);
- (2) tribal boundaries, as described in the Staff Proposal, pursuant to Pub. Util. Code Sections 661(a)(3) and 660(i); and
- (3) their own service territory boundaries.

4. Disadvantaged Communities

Pursuant to Pub. Util. Code Section 661(a)(3), gas utilities shall map disadvantaged communities utilizing the most recent version of CalEnviroScreen. For maps due July 1, 2025, categories of disadvantaged communities mapped shall include:

- Designated as a disadvantaged community in 2017,
- The highest 25 percent of CalEnviroScreen scores,
- Have high pollution burden scores,
- Native American tribal lands, and
- Communities with missing data.

Low-income designation and other community characteristics not listed above are not required to be mapped by July 1, 2025.

5. Electricity Capacity Data

In their July 1, 2025 maps, gas utilities shall include available electricity capacity, as represented in integration capacity analysis (ICA) maps. This information will support neighborhood zone discussions and is already publicly available. Cal Advocates, Joint CCAs, and SCE shall prioritize inclusion of the above electricity capacity data, pursuant to my authority under Pub. Util. Code Section 661(a)(4)

There are multiple electricity data layers available publicly on ICA maps. All three large electricity investor-owned utilities provide mapped layers which represent currently available integration capacity (MW) for load. These are

labelled on existing ICA maps as “Load Hosting Capacity (kW)” by PG&E, “Integration Capacity (MW)” for “Uniform Load” by Southern California Edison Company (SCE), and “Integration Capacity, Uniform Load (MW)” by SDG&E. These layers are updated monthly and shall be reflected in initial SB 1221 maps, at least quarterly, starting October 1, 2025.

SCE also provides an alternative layer that forecasts future capacity, which it names “available capacity.” SCE requests to use this layer until ICA methodological updates are available later this year.⁹ PG&E also anticipates refinements to forward-looking capacity information, as noted in its ICA map. At this time, these layers are not sufficiently standardized for use on SB 1221 maps, but electricity layer choice may be reconsidered in this proceeding for subsequent SB 1221 maps.

6. Priority Neighborhood Decarbonization Zones and Additional Information Required by the Commission

Pub. Util. Code Section 661(a)(3) indicates that annual SB 1221 maps shall include “priority neighborhood decarbonization zones, as designated by the commission pursuant to Section 662.” Section 661(a)(4) requires gas corporations to map “[a]ny additional information required by the commission.”

The Staff Proposal, including the “Draft Directions to Utilities” which was attached to it, recommended that gas utilities map data that staff anticipates may be helpful for designating neighborhood decarbonization zones and supporting implementation of SB 1221.¹⁰ PG&E, SoCalGas, SDG&E, and Southwest Gas note that this information is substantially more than has been previously required of

⁹ SCE Opening Comments at 4-5.

¹⁰ *Directions to Utilities, Including Information to be Provided: Draft for Comment*, issued as an attachment to *Administrative Law Judge’s Ruling on Senate Bill 1221 Staff Proposal and Directions to Utilities*, requesting comment, on February 20, 2025.

them.¹¹ The Commission has also not yet designated priority neighborhood decarbonization zones pursuant to Pub. Util. Code Section 662, because the deadline for making this determination is January 1, 2026. However, the inclusion of priority neighborhood decarbonization zones is required for the updated utility maps after the initial July 1, 2025, per Pub. Util. Code Section 661(a)(1).

Therefore, rather than requiring utilities to map additional information and zones by July 1, 2025, I will reconsider and address this issue and the definition of zones in the latter part of 2025, in advance of the January 1, 2026 deadline.

7. Confidentiality

PG&E, SoCalGas, SDG&E, and Southwest Gas propose to provide confidential maps by July 1, 2025.¹² PG&E generally questioned whether SB 1221 requires any public map by July 1.

While SB 1221 does not explicitly require utilities to submit public maps by July 1, 2025, the Commission's designation of neighborhood decarbonization zones by January 1, 2026, must be made based upon and "following recommendations from each gas corporation and the opportunity for public comment."¹³ Therefore, for transparency and efficiency purposes, I reduce the requirements for gas utilities' maps due on July 1, 2025, to address gas utilities' confidentiality concerns. Gas utilities may also accompany the public map with a confidential map on July 1, 2025, at their own discretion.

¹¹ See, e.g., Joint Utilities Opening Comments at 11-12.

¹² PG&E Opening Comments at 5; Joint Utilities Reply Comments at 8.

¹³ Pub. Util. Code § 662(a).

Gas utilities shall provide initial public SB 1221 maps by July 1, 2025, compliant with this ruling and Appendix A. If necessary, gas utilities shall also provide a confidential map to the Commission on July 1, 2025, and any parties who have signed a non-disclosure agreement (NDA) with the respective gas utilities. The confidential version shall contain the same information as the public version aggregated to the zip code and census tract levels or greater as the gas utilities deem necessary to protect confidentiality. Gas utilities that seek confidential treatment shall each file a motion and make the showings required by General Order 66-D.

Consistent with PG&E's proposal to work with parties to provide additional, expanded material after the initial July 1, 2025 statutory deadline,¹⁴ PG&E shall meet and confer with SoCalGas, SDG&E, Southwest Gas, and any other interested parties to address (1) which map data proposed in the Staff Proposal raises feasibility concerns, the basis of each of those concerns, and how they might best be resolved; and (2) data access and confidentiality concerns regarding the data proposed in the staff proposal as well as the data required per this ruling, the basis of each of those confidentiality concerns, and how they might best be resolved. Additional map data of interest to participating parties may also be discussed in the same manner.

In these discussions, I encourage PG&E and all parties to recognize my commitment to making as much relevant information public as possible to further the objectives of SB 1221, while striking a balance between safety, feasibility, and openness. The PG&E-led discussions are an opportunity for

¹⁴ PG&E Reply Comments at 5-6.

parties to work through data issues and allow party representatives to access more sensitive information pursuant to an NDA.

By June 4, 2025, PG&E shall provide a status update on its progress or a specific proposal for Commission consideration.

8. Compliance for Small Gas Utilities

Several parties commented on whether the Commission should require other small gas utilities to comply with SB 1221. SCE – Catalina Island, which provides propane on the island through utility-owned pipelines, volunteered to provide maps of its potential and foreseeable gas decommissioning projects.¹⁵

I appreciate SCE’s comments and require other gas utilities that serve retail customers in California, even those gas utilities that are not named as the four largest “gas utilities,” to provide maps by July 1, 2025. These smaller gas utilities shall show their gas utility service area boundaries, formatted consistently with the directions below, and may optionally provide any of the other information required of PG&E, SoCalGas, SDG&E, and Southwest Gas. Their maps shall be provided as downloadable files rather than live webpages.

Some public utility gas corporations provide gas storage but do not serve retail customers and are therefore not subject to the requirements of this ruling.

IT IS RULED that:

1. By May 7, 2025, PG&E, SoCalGas, SDG&E, and Southwest Gas shall provide an update on their progress towards July 1 maps that complies with the updated directions provided in Appendix A “Directions to Utilities for Compliance by July 1, 2025.”

¹⁵ SCE Reply Comments at 1.

2. By July 1, 2025, PG&E, SoCalGas, SDG&E, and Southwest Gas shall comply with the direction provided in Appendix A “Directions to Utilities for Compliance by July 1, 2025.”

3. By 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.

4. By June 4, 2025, PG&E shall:

- a. Meet and confer with SoCalGas, SDG&E, Southwest Gas, and any other interested parties to discuss and address (1) which map data proposed in the staff proposal raises feasibility concerns, the basis of each those concerns, and proposals to resolve those concerns; (2) data access and confidentiality concerns regarding the data proposed in the Staff Proposal as well as the data required per this ruling, the basis of each of those confidentiality concerns, and proposals to resolve those concerns, including potential Non Disclosure Agreements by parties; and (3) any additional map data of interest to participating parties; and
- b. Provide a status update on its progress or a specific proposal for Commission consideration.

Dated April 18, 2025, at San Francisco, California.

/s/ KAREN DOUGLAS

Karen Douglas
Assigned Commissioner