



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

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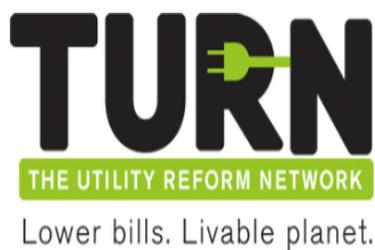
R2409012

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)

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK  
REGARDING DESIGNATING PRIORITY NEIGHBORHOOD  
DECARBONIZATION ZONES**



Jalal Awan, Energy and Climate Policy Analyst  
Marcel Hawiger, Staff Attorney

**THE UTILITY REFORM NETWORK**

360 Grand Avenue, Suite 150

Oakland, CA 94610

Phone: (415) 929-8876

Fax: (415) 929-1132

Email: [mhawiger@turn.org](mailto:mhawiger@turn.org)

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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK  
REGARDING DESIGNATING PRIORITY NEIGHBORHOOD  
DECARBONIZATION ZONES**

Pursuant Rule 1.15 of the Commission’s Rules of Practice and Procedure and to the directions provided in the “Administrative Law Judges’ Ruling On Designating Priority Neighborhood Decarbonization Zones” (the “ALJs Ruling”), issued on June 5, 2025, as amended by the ALJ Ruling of August 25, 2025,<sup>1</sup> the Utility Reform Network (TURN) submits these reply comments to the party comments addressing utility recommendations for defining priority neighborhood decarbonization zones (decarbonization zones or PNDZs). TURN did not submit opening comments on the utility proposals.

**1 Summary of Utility Recommendations for Designating Priority Neighborhood Decarbonization Zones**

In their filings submitted on July 21, 2025, the three major natural gas corporations – Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), and San Diego Gas & Electric (SDG&E) - essentially asked the Commission to designate priority neighborhood decarbonization zones (decarbonization zones) based solely on the last of the four factors enumerated in Section 662(a) – the presence of potential or foreseeable pipeline replacement projects on the SB 1221 maps filed on July 1, 2025

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<sup>1</sup> The ALJ Ruling of 8/25/2025 extended the deadline for reply comments from August 29, 2025 to September 10, 2025, so as to allow parties time to review confidential information pursuant to an NDA. TURN notes that access to the confidential data took additional time, and TURN has not fully incorporated the confidential data in these reply comments.

pursuant to Section 661(a).<sup>2</sup> Furthermore, the utilities asked that the Commission identify **all of the areas with potential or foreseeable replacement projects** to be classified as decarbonization zones, resulting in a large portion of their service territories being classified as a potential neighborhood decarbonization zone.

Additionally, the utilities did not recommend that the Commission distinguish in any way between the replacement projects “foreseeable” over the next ten years, and recommended that the Commission evaluate the other three Section 662(a) factors later, when the pilot decarbonization program design is clarified. For example, SoCalGas stated:

While at some point in the course of implementing SB 1221 and advancing neighborhood decarbonization zone pilot projects it may be necessary and appropriate to limit or prioritize candidate projects geographically, the Joint Utilities advise that this prioritization should not occur prior to establishing the program itself. There is currently an absence of direction related to how the program will be implemented and how projects will be tested for viability, including but not limited to cost-effectiveness methodology, financial treatment of costs and their allocation, customer engagement, obtaining consent and other participant agreements, addressing the consequences of failing to obtain full consent from customers, program restrictions, and other associated requirements that may materially influence the identification of pilot zones.<sup>3</sup>

SoCalGas noted that “high/low Temperature areas,” as specified in Section 662(a)(1), could be mapped using California Energy Commission (CEC) data, and that the presence of supportive local government or community partners can be inferred from by considering “which local governments have enacted reach codes.”<sup>4</sup> PG&E noted that:

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<sup>2</sup> See, ALJs’ Ruling Extending the Deadline for Reply Comments, 8/25/2025, p. 3.

<sup>3</sup> SoCalGas and SDG&E Joint Recommendations, July 21, 2025, p. 3.

<sup>4</sup> SoCalGas and SDG&E Joint Recommendations, July 21, 2025, p. 2.

“Many of our community collaborators expressed concern that equity measures that average over large areas, such as census tracts, are imperfect and often fail to capture local variations in need and access at the much smaller scale that these pilots would be scoped on.”<sup>5</sup>

In these reply comments, TURN focuses our attention on comments concerning the proposals from PG&E and SoCalGas, though our technical analyses is limited to the mapping data provided by PG&E.<sup>6</sup>

## **2 Summary of Party Comments and TURN Reply Comments**

### **2.1 Summary of Party Comments**

Parties which submitted comments on the recommendations of PG&E and SoCalGas differ on their support or opposition to the utility recommendations. In general, representatives of local governments and community choice aggregators support the utilities’ “broad” and “flexible” definition of decarbonization zones, and those parties emphasize the need for a process that would include the participation of local governments to subsequently identify viable locations for pilot projects.<sup>7</sup> On the other hand, parties representing environmental and ratepayer interests are generally critical of

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<sup>5</sup> PG&E Opening Comments, July 21, 2025, p. 2.

<sup>6</sup> TURN acknowledges that Southwest Gas provided much more detailed recommendations concerning decarbonization zones and mapping, and the Public Advocates Office (Cal Advocates) provided extensive comments on these recommendations.

<sup>7</sup> For example, Joint CCAs at p. 3-4; County of Contra Cost at pp. 2-3; City and County of San Francisco at pp. 3-4. If not otherwise identified, all citations are to party opening comments filed on August 8, 2025.

the overly broad definitions and the lack of sufficient granularity or any incorporation of the first three factors listed in Section 662(a).<sup>8</sup>

Despite this general difference in approaches, most parties provide some recommendations for immediate additions/changes to the maps, and/or for future modifications. These recommendations address at least the following four issues:<sup>9</sup>

1. How to provide more detailed pipeline replacement project information to improve the maps:
  - Include more granular data, including project mileage, number of projects in each census tract, anticipated project date and timeline, project location, number of customers per project, and preliminary hydraulic feasibility screen. (Cal Advocates; CforAT; CCSF; BayREN and 3C-REN; SC/NRDC)<sup>10</sup>
  - Order utilities to provide revised more narrow NDZ recommendations (CforAT; BayREN and 3C-REN; Cal Advocates)
  - Improve access to confidential information. (BayREN and 3C-REN; CCSF)
2. How to incorporate the equity factors in Section 662(a)(1) and (2):
  - Incorporate climate zone and RASS data. (SC/NRDC)
  - Incorporate at least one equity screen for DACs (SCE; SC/NRDC)
  - Allow use of local equity metrics in addition to CalEnviroScreen. (CCSF)

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<sup>8</sup> For example, Sierra Club and NRDC at pp. 5-6; Cal Advocates at p. 6-7; CforAT at pp. 5-6.

<sup>9</sup> The identification of parties in the following list is not meant to be exhaustive or complete; and not each party necessarily identified each element listed in a bullet point. TURN also notes that while party comments focus on the *designation* of PNDZs, there are overlapping issues regarding utility compliance with the directives of the April 18, 2025 ACR regarding the data that should be contained on the SB 1221 maps filed on July 1, 2025.

<sup>10</sup> The Cal Advocates provided perhaps the most detailed list of additional data that could be incorporated on the SB 1221 maps.

- Identify non-ratepayer funding sources. (CCC)
3. How to incorporate the government/community support factor in Section 662(a)(3):
    - Establish clear process for engaging local governments and community organizations. (CCSF; ABAG and 3C-REN;
    - Provide visual mapping information based on available outreach, past research, and available evidence of local jurisdiction interest. (Cal Advocates; SC/NRDC)
  4. How to develop a process to update the NDZs pursuant to Section 662(d):
    - Establish ongoing process for updating potential NDZ designations. (SC/NRDC)

While TURN supports many of these proposals, we focus our reply comments on issues number 1 and 2 above.

## **2.2 Summary of TURN Reply Comments and Recommendations**

TURN has reviewed the utility maps and focuses our reply comments and recommendations on the utilities' use of the fourth 662(a) factor – the “concentration of gas distribution line replacement projects” – as the factor for designating decarbonization zones. We agree with several of the specific proposals that utilities should both provide more granular data on their maps, and should incorporate existing data – especially including replacement project commencement schedules and CalEnviroScreen scoring data - to narrow the recommended decarbonization zones. Furthermore, the Commission should require the utilities to delineate projects across census tracts (if any) by providing a project identifier for each census tract row, ensuring that projects spanning multiple

census tracts include the same project identifier in each affected tract to enable cross-tract project comparison.

Moreover, TURN's analysis of PG&E's data<sup>11</sup> illustrates a more fundamental problem, as it indicates that the foreseeable projects (from the July 1 SB 1221 maps) may not be closely correlated with the utility's risk modeling results (filed on January 13, 2025), and may thus not properly target those locations where the utilities should make capital expenditures to replace natural gas distribution pipelines based on the utilities' own risk scores.<sup>12</sup> TURN recommends that the Commission create a process – either in this proceeding or in utility rate cases - to evaluate the utilities' "foreseeable" 2,000 miles (for PG&E and SoCalGas) of distribution pipeline replacement projects and their relationship to the utilities' distribution integrity management plan (DIMP) risk results. TURN's specific substantive recommendations are detailed in Section 3.2 below.

With respect to the incorporation of equity factors, TURN's analysis indicates that PG&E's foreseeable project locations do not align well with CalEnviroScreen scores. TURN strongly supports at a minimum requiring all the utilities to provide

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<sup>11</sup> TURN analyzed PG&E's data due to its more complete data presentation and due to limited time resources. We do not suggest at all that PG&E's modeling results are somehow more or less accurate than those of the other utilities.

<sup>12</sup> TURN acknowledges that operational and technical constraints (for example, hydraulic feasibility) may prevent utilities from strictly following risk-based pipeline replacement schedules. However, feasibility concerns should only be considered after potential neighborhood decarbonization zones are first identified through transparent risk-based rankings.

CalEnviroScreen scores on their maps and to incorporate CalEnviroScreen score results to narrow the selection of decarbonization zones.<sup>13</sup>

TURN also agrees that the Commission should develop a process, pursuant to Section 662(d), to update any designations of priority NDZs based on future work assessing the viability of specific projects and their consistency with the factors listed in Section 662(a).

### **3 TURN Reply to Party Comments Regarding Utility Recommendations for Priority Neighborhood Decarbonization Zone Designations**

#### **3.1 TURN Is Sympathetic to the Problems of Timing, and Agrees that a Process to Update the Preliminary Designations Is Necessary**

The comments of the Cal Advocates contain a useful summary of the timeline dictated by legislative requirements.<sup>14</sup> TURN appreciates that the legislative guidelines complicate the identification of decarbonization zones, and in hindsight, it may have been easier if the Legislature required the development of a project cost effectiveness and viability framework in advance of the designation of PNDZs. SCE, which is not a natural gas company, recommends that the Commission identify PNDZs very broadly at this stage, and focus on developing other aspects of the pilot selection framework that may then be used to narrow the geographic selection of PNDZs.<sup>15</sup>

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<sup>13</sup> IOUs should provide both CalEnviroScreen (CES) and Cumulative Impact (CI) Scores (where , by census tract (<https://sustainability.ucr.edu/calenviroscreen-40#:~:text=does%20this%20mean?-,What%20is%20It?,of%20a%20set%20of%20indicators.>)

<sup>14</sup> Cal Advocates at pp. 3-4.

<sup>15</sup> SCE at pp. 2-4. SCE further recommends that the Commission could prioritize areas where “at least one other SB 1221 factor is present.”

Due to the difficulties in identifying decarbonization zones at this stage, TURN strongly agrees with several parties that the Commission should commit to a process to update any initial designations as permitted by Section 662(d). Nevertheless, the utilities' reluctance to narrow down their recommendations in any fashion at this time is unreasonable, and, in combination with the lack of certain project-specific data on the maps, makes it very difficult for other parties to provide meaningful public input. The success of any eventual pilot projects to decarbonize PNDZs will depend on local support and customer participation. Such support and participation will take significant effort and time, especially in disadvantaged communities.<sup>16</sup> All of the existing electrification projects conducted by PG&E in its Alternative Energy Program electrified a single large commercial customer. It is thus important to develop the tools that will help identify PNDZs that are consistent with legislative directions and may result in viable electrification projects within a time line consistent with the schedule for pipeline replacements.

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<sup>16</sup> See, California Energy Commission, *An Analytical Framework for Targeted Electrification and Strategic Gas Decommissioning: Identifying Potential Pilot Sites in Northern California's East Bay Region*, June 2024, pp. 4, 36-37.

### **3.2 Utility Recommendations to Use All Foreseeable Replacement Projects Are Too Broad and Lack Transparency with Respect to How the Utilities Identified Those Projects Using Risk Modeling Results**

#### **3.2.1 The Utility Recommendations Should Use Available Data to Narrow Down the Designations**

The result of the IOUs' (PG&E and SoCalGas) recommendations would be to designate a large percentage of their service territories as PNDZs, subject to some modification based on an as yet unspecified process.

Based on the directives in the ALJ Ruling from November 22, 2024, the IOUs<sup>17</sup> provided risk-related data as well as pipeline mileage associated with the top 10 risk deciles at a census tract level, and pursuant to SB 1221 July 1 maps, provided a forecast of planned or estimated distribution mains replacement over the next ten years, also at the census tract level. While the projected replacement miles constitute less than 5% of each utility's pipeline system,<sup>18</sup> these miles are contained within 1,994 census tracts for PG&E, and 2,576 census tracts for SoCalGas, out of a total of 9,130 census tracts in the entire State. In other words, the estimated replacement mileage is geographically dispersed, and covers a much larger percentage of the geographic area than the percentage of linear miles slated for replacement.<sup>19</sup>

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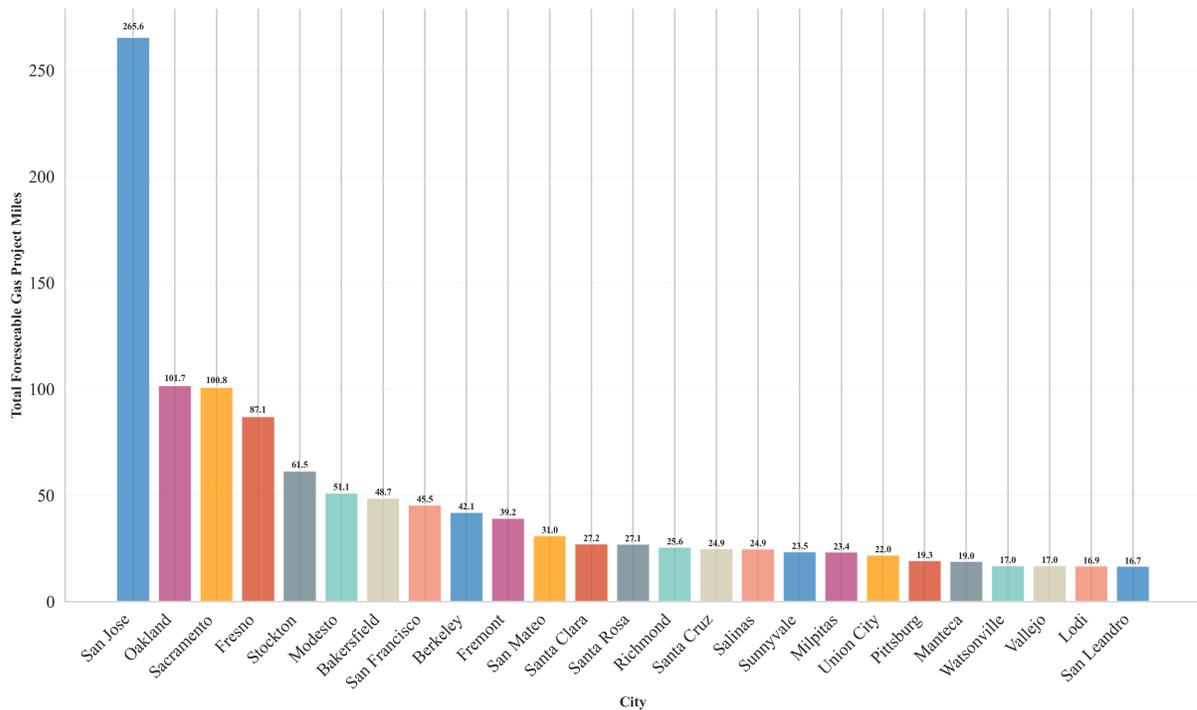
<sup>17</sup> Due to limited time, TURN has only focused our work on PG&E and SoCalGas, and has only analyzed the data from PG&E, as it was much more comprehensive than data for SoCalGas or SDG&E.

<sup>18</sup> See, also, *ALJs' Ruling Seeking Data from Gas Utilities*, November 22, 2024, Appendix B, pp. 17-18.

<sup>19</sup> For example, 1,994 census tracts with foreseeable replacements across PG&E's service territory encompassing 3,417 total census tracts represents 58.3% of the utility's territory. TURN has not yet obtained utility-specific census tract data from SDG&E/SoCalGas.

The maps provided by the utilities show a distribution of potential projects across much of the service territory. For example, as illustrated below for PG&E,<sup>20</sup> while significantly more project miles are planned for the City of San Jose, there are replacement project miles planned within almost every major city in the PG&E service territory.

**Figure 1: Top 25 PG&E Cities by Gas Project Mileage<sup>21</sup>**



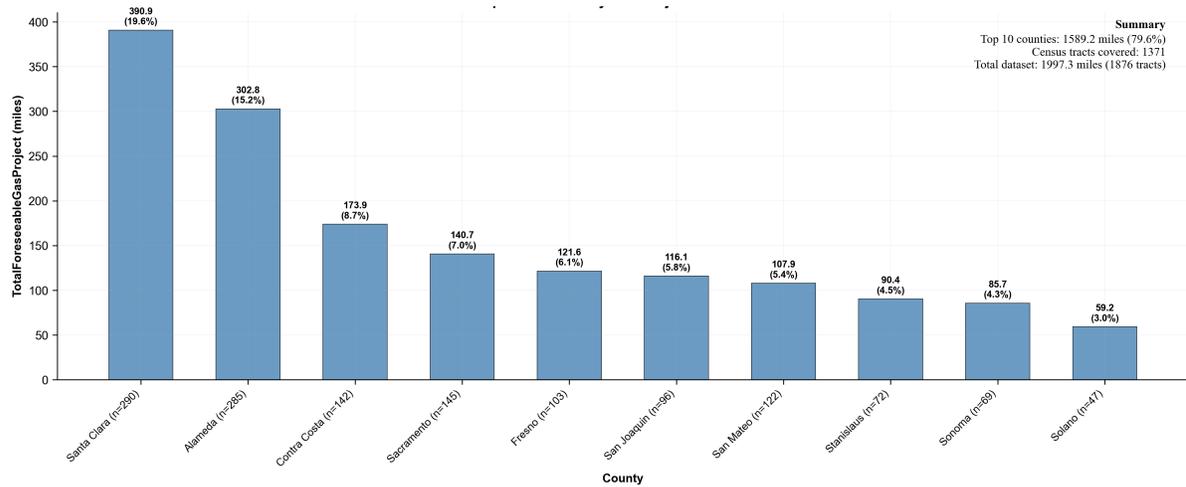
Similarly, approximately 80% of the planned replacement mileage for PG&E is located in ten counties. TURN has not examined whether there is any correlation of

<sup>20</sup> In these reply comments, TURN’s analyses PG&E data because PG&E provided the most comprehensive data subsequent to both the ALJ’s November 14, 2024 Ruling seeking additional data from gas IOUs, as well as the July 1, 2025 iteration of SB 1221 maps.

<sup>21</sup> Since several census tracts contained multiple cities, TURN made the simplifying assumption that if a census tract with foreseeable replacements spans multiple cities, the total mileage is divided equally among all cities listed.

foreseeable replacements with the size, age, material type or other characteristics of the distribution systems in those counties.

**Figure 2: 80% of Replacment Mileage for PG&E Is in 10 out of ~48 counties**  
(n = census tracts)



Based on the data above, TURN supports the comments of multiple parties, and particularly Cal Advocates and SC/NRDC, who recommend that the maps should include significant additional data concerning planned or foreseeable replacement projects (as opposed to pipeline mileage aggregated at the census tract levels). In particular, TURN emphasizes the need for project level data that includes: 1) risk-related metric(s) that underpin foreseeable replacements, 2) customer counts, and 3) project timelines. In order to identify decarbonization zones and future potential pilot project locations, it will be necessary to know the number of customers in order to meet the requirements of Sections 663(a) and (b)(4). The utilities should easily have available the number of services connected to each anticipated distribution mains replacement project. Even more importantly, the timing of any replacement project is critical for use in selecting

decarbonization pilots, given that developing the local support necessary to implement pilot projects may better align with projects slated for replacement in 5-10 years, rather than projects planned for the next five years.<sup>22</sup> The Assigned Commissioner’s Ruling of April 18, 2024 ordered the utilities to include on their maps “the forecasted commencement year for each project, which may extend beyond ten years as needed due to variations in calculation methods.” PG&E provided the requested data, but SoCalGas and SDG&E only provided forecast replacements for 2026-2027.<sup>23</sup> Thus, TURN recommends that the Commission 1) order any utility that did not provide the requisite project timeline data to do so, and 2) order the utilities to color code those map areas with projects slated to commence in 2030 or later.

TURN appreciates that utilities may not have firm project start dates, especially for projects not currently in planning stages. However, based on their responses provided in R.20-01-007, TURN assumes that the relative risk scores of projects provide an approximate proxy for the relative timeline of future projects. In other words, out of the top 2,000 riskiest miles of pipeline, projects in the “top 1,000” miles may be more likely to be initiated in the next five years, while projects in the “bottom 1,000” miles may be more likely to be initiated in 5-10 years.<sup>24</sup> If this is a correct understanding, using risk

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<sup>22</sup> See, California Energy Commission, *An Analytical Framework for Targeted Electrification and Strategic Gas Decommissioning: Identifying Potential Pilot Sites in Northern California’s East Bay Region*, June 2024, pp. 2-3, 34-35.

<sup>23</sup> TURN believes that the maps submitted by SoCalGas and SDG&E are not compliant with the directives of the 4/18/25 ACR, both with respect to project timelines as well as with respect to mapping disadvantaged communities. Specifically, SoCalGas and SDG&E maps (unlike PG&E’s) do not disaggregate foreseeable replacements by pipeline material type and do not overlay CalEnviroScreen scores on their respective maps.

<sup>24</sup> See, for example, ALJ Ruling, 11/22/2024, p. 16.

score data associated with each “project” that is aggregated at the census tract level on the maps would provide an alternative methodology to use for designating later stage projects.

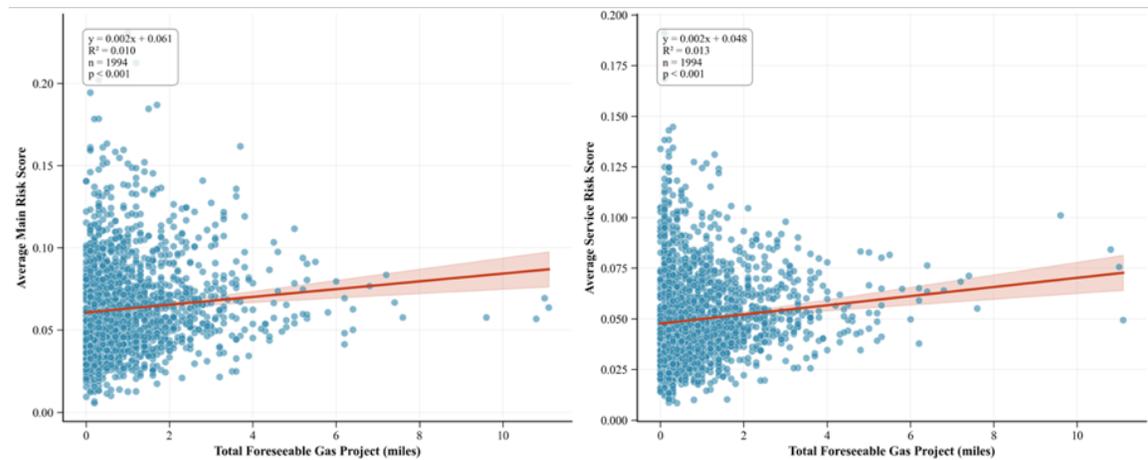
Indeed, a major problem facing all parties in this process is that the utility census tract level aggregated data does not provide sufficient detail to evaluate certain factors that are relevant for decarbonization “projects.” While a granular project level mapping including geospatial linear pipeline data would be most useful, TURN still recommends that the Commission, at a minimum, require utilities to define and parameterize what constitutes a potential “project” in their submitted census tract-level mapping data, including clear criteria for project boundaries and scope. Additionally, utilities should delineate projects across census tracts (if any) by providing a project identifier for each census tract row, ensuring that projects spanning multiple census tracts include the same project identifier in each affected tract (e.g., “Project A” appearing in both census tract 456123 and census tract 123456) to enable cross-tract project comparison.

### **3.2.2 The Utility Recommendations Lack Transparency with Respect to the How the Utilities Identified Pipeline Replacement Projects Using Risk Modeling Results**

The recommendation to include risk scores on the maps leads us to raise an even more fundamental point. Even if the CPUC accepts the recommendation of the utilities to designate all areas containing planned or foreseeable replacement projects as decarbonization zones, the Commission should require much greater disclosure and transparency regarding the utilities’ selection of the “foreseeable” replacement projects based on the risk results of their DIMP models.

For example, TURN analyzed PG&E’s SB 1221 maps by combining the pipeline risk data provided on January 13, 2025 with the mapping results showing forecast replacement projects. PG&E’s data contain numerous variables related to the “likelihood of failure” and the “consequence of failure.” It appears that PG&E uses the term “AvMainRiskScore” as a normalized representation of total risk, though its specific definition is ambiguous.<sup>25</sup> The correlation between this term and the foreseeable replacement mileage, however, is very weak, indicating that the average main risk score explains only about 1% of the variance in foreseeable main distribution replacement mileage.

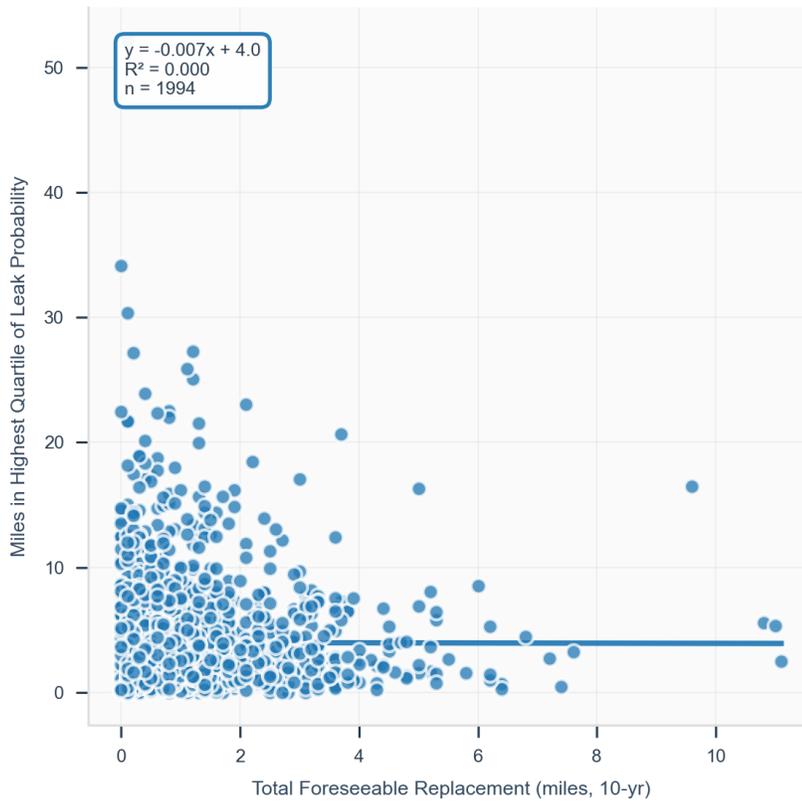
**Figure 3: The Correlation Between Risk and Pipeline Projects is Less than 1%**



PG&E’s data also show that the selected mileages are very weakly correlated with the risk of failure (aka risk of pipeline leakage):

<sup>25</sup> In its January 13, 2025 submission PG&E defines AvMainRiskScore as “Average calculated risk score, in terms of significant injury or fatality (SIF), per year.” There is no other variable that appears intended to account for total risk (likelihood \* consequence).

**Figure 4: PG&E’s Selected Main Replacement Projects Are Very Weakly Correlated with the Risk of Failure<sup>26</sup>**

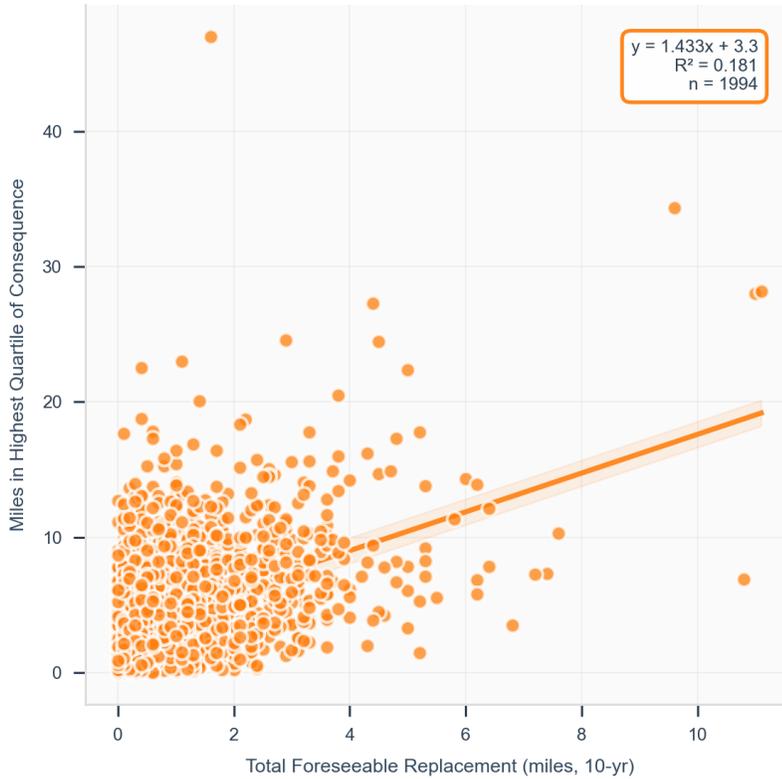


The selected miles are slightly more correlated with the consequence of failure (probability of serious safety incident), showing that 18% of the variation in total foreseeable miles is predicted by the consequence score:

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<sup>26</sup> TURN’s analysis found almost identical results for the service replacement projects.

**Figure 5: PG&E’s Selected Main Replacement Projects Correlate More with the Consequence of Failure**

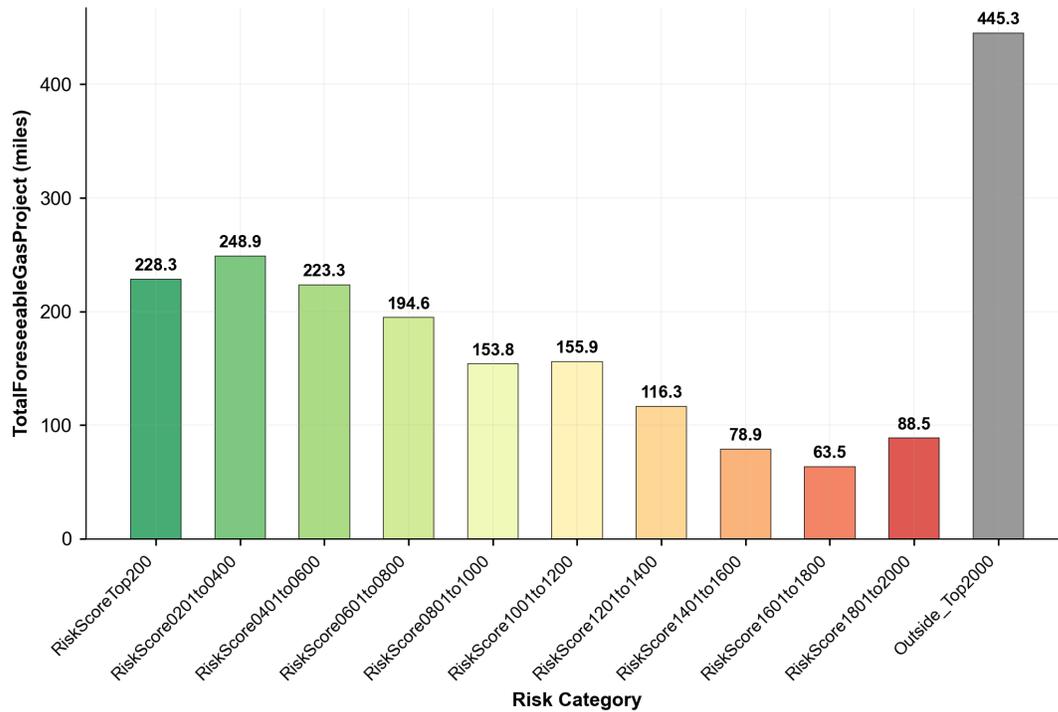


TURN cannot determine with certainty whether this univariate correlation analysis indicates that PG&E’s selection of projects is not closely tied to its DIMP risk results, or represents an inherent limitation based on the aggregation of data in these combined data sets. TURN continues to believe that the Commission should order the utilities to provide mapping data at a more disaggregated level than census tract to facilitate accurate comparison.

TURN also compared PG&E’s foreseeable replacement mileage with the risk decile data provided previously to the Commission. If PG&E’s maps contained only the riskiest 2,000 miles of pipeline, all of the projects on the map should fall into one of the

risk deciles; however, it appears that 445 miles (or 22%) of the foreseeable projects are not within the riskiest 2,000 miles. Such a result appears to thwart the intent of Section 661(a)(1) that the utilities should map “potential gas distribution line replacement projects identified in its distribution integrity management plan.”

**Figure 6: About 22% of PG&E’s Foreseeable Projects Are Not in the Highest 2,000 Miles of Risk**



TURN hesitates to reach firm conclusions based on this preliminary analysis. We strongly recommend that the technical issues concerning the relationship between the utilities’ distribution integrity management risk models and the projects presented on the SB 1221 maps be further analyzed via technical workshops, and be subject to continued revision in tandem with any updates to the designations of PNDZs. Absent a transparent framework that demonstrates how the utilities apply the definition of risk (probability ×

consequence) to identify foreseeable replacements, it is not possible to verify whether replacement plans are aligned with risk reduction objectives and the intent of SB 1221.

TURN thus recommends that prior to adopting the priority NDZs based on the utilities' maps of replacement projects provided pursuant to Section 661(a), the Commission should require the utilities to:

- Provide an extra GIS layer based on risk scores from their respective DIMPs, for each census tract within their territory, overlaid on their existing SB1221 public maps. This overlay should use different colors to distinguish the top 2,000 geospatial linear miles of pipeline replacement projects, enabling clear visualization of how foreseeable replacement projects map to underlying risk assessments.<sup>27</sup>
- Provide more specific segment or project-level risk data, and incorporate such data in the mapping.
- Provide an explanation for any major differences in the results of the DIMP risk analysis versus the utility selection of the top “n” miles for replacement.
- Set a phase in this proceeding to evaluate how the utilities' DIMP risk modeling results evaluate risk, and the relationship between the model results and utility selections of foreseeable replacement projects.<sup>28</sup>

TURN appreciates that actual selection of “projects” for replacement may depend on factors other than pure risk model results. However, it is important to understand how

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<sup>27</sup> Per ALJ Ruling from November 22, 2024 (p.7, fn 3), for SDG&E, use top 70 miles instead of 200, and adjust definitions and column names accordingly. For Southwest Gas, use top 30 miles instead of 200, and adjust definitions and column names accordingly.

<sup>28</sup> The DIMP model results could be addressed in utility-specific rate cases, where those model results support utility forecasts of capital expenditures on pipeline replacement. However, TURN suggests that it may be more useful to evaluate the DIMP models for all of the utilities in a phase of this proceeding, as long as it does not delay implementation of SB 1221 requirements.

the risk modeling is related to the selection of projects. Without greater transparency regarding the utilities' selection of replacement projects, utility replacement decisions may not align well with the cost-effective decarbonization goals of SB 1221 or with ratepayer interests.

### **3.3 TURN Supports Using at Least One Equity Criteria to Limit the Initial NDZ Designation**

Sierra Club and NRDC recommend that the Commission initially use maps developed by the federal Department of Housing and Urban Development that “show low- to moderate-income areas, which HUD defines as census block groups where over 50 percent of households in the block group earn less than 80 percent of Area Median Income” as an additional criterion.

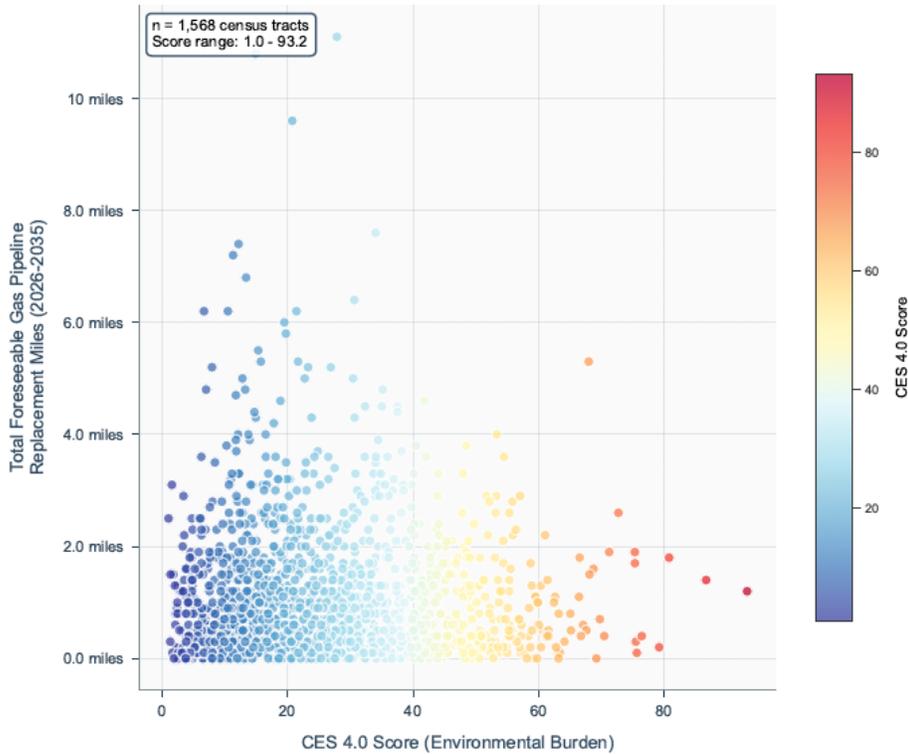
TURN agrees that using such a map overlay is consistent with at least one element of the Environmental and Social Justice Action Plan.<sup>29</sup> However, using only income data ignores the pollution burdens on historically disadvantaged communities. The CalEnviroScreen scores include additional relevant metrics on pollution, health and socio-economic status and is more consistent with the Commission's definition of “environmental and social justice communities.” TURN's initial analysis shows that PG&E's foreseeable pipeline projects do not align well with the CalEnviroScreen scores, as the majority are in locations with scores below 40, as shown below.<sup>30</sup>

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<sup>29</sup> See, CPUC Environmental and Social Justice Action Plan, v. 2.0, April 7, 2022, pp. 73-74.

<sup>30</sup> TURN appreciates that at least PG&E provided the required CalEnviroScreen scoring data. SoCalGas and SDG&E did not provide any such data in usable formats.

**Figure 7: PG&E’s Foreseeable Projects Do Not Align Closely with CalEnviroScreen Scores for Disadvantaged Communities**



TURN recommends that the Commission require all the utilities to include the CalEnviroScreen scores on their SB 1221 maps and to identify those census tracts with replacement projects that fall into the top quartile of CalEnviroScreen scores. TURN agrees with Cal Advocates and SC/NRDC that the utilities should use available data from the CEC, including RASS data, to combine equity considerations with data regarding climate zones and the disproportionate lack of cooling or heating in the NDZ designation process. TURN recommends that the Commission first order the utilities to submit proposals on how to incorporate Section 662(a)(1) requirements in the designation process, and then schedule a workshop and/or comments to address the possibilities and evaluate viable proposals.

### **3.4 Process for Updating the NDZ Designations**

TURN agrees that given the utilities' initial proposals for designating all of the census tracts containing any foreseeable replacement projects as priority neighborhood decarbonization zones, it is very likely that the Commission will need to update the PNDZs over time. TURN suggests that such a process be iterative, and include different mechanisms for incorporating data primarily within the utilities' control (risk results, replacement project details, confidentiality issues) versus information that will require broader input (supportive local government or community partners, lack of cooling and heating). Nevertheless, TURN strongly recommends that, based on the information provided in the comments and reply comments, the Commission require the utilities, and especially PG&E and SoCalGas and SDG&E, to refine their recommendations within the next two months to incorporate project timeline and CalEnviroScreen data, so that the Commission can designate more limited PNDZs by the January 1, 2026 statutory deadline.

## **4 Conclusion**

TURN appreciates this opportunity to provide reply comments. Given the significant number of interrelated issues that the Commission must address pursuant to Sections 662 and 663, TURN recommends that the Commission continue to move forward to develop guidelines for implementing pilot projects, at the same time as it works to provide greater transparency and accuracy to the utility designations of PNDZs and the inclusion of relevant information on the SB 1221 maps. TURN recommends that the Commission require the utilities to immediately incorporate or provide additional

information – including replacement project commencement schedules and CalEnviroScreen scoring data – on their SB 1221 maps in order to narrow the first designation of PNDZs. TURN also recommends that the Commission require the utilities to update their SB 1221 maps by providing certain segment or project-level risk data, as discussed in Section 3.2.2 above. And lastly, TURN recommends that Commission create a process, ideally in this proceeding, to evaluate how the utilities’ DIMP risk modeling results evaluate risk, and the relationship between the model results and utility selections of foreseeable replacement projects.

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Respectfully submitted,

By:   
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Marcel Hawiger, Staff Attorney

**THE UTILITY REFORM NETWORK**  
360 Grand Avenue, Suite 150  
Oakland, CA 94610  
Phone: (415) 929-8876  
Fax: (415) 929-1132  
Email: [mhawiger@turn.org](mailto:mhawiger@turn.org)