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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of SOUTHERN
CALIFORNIA GAS COMPANY
(U904G) and SAN DIEGO GAS &
ELECTRIC COMPANY (U902G) for
authority to revise their natural gas rates
and implement storage proposals
effective January 1, 2027 in this Cost
Allocation Proceeding.

Application 25-09-014

PROTEST OF THE PUBLIC ADVOCATES OFFICE

I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure (Rules), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits this protest to the *Cost Allocation Proceeding Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G)*, filed on September 30, 2025, for authority to revise their natural gas rates and implement storage proposals effective January 1, 2027.¹

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively SEMPRA²) seek authority to revise rates for natural gas services, and to implement gas storage related proposals effective January 1, 2027 through December 31, 2029.³ SEMPRA's previous Cost Allocation Proceeding (CAP), filed in Application (A.)22-09-015, sought to revise rates for gas services, and to

¹ Notice of the Application's filing first appeared in the Commission's Daily Calendar on October 8, 2025; therefore, this protest is timely filed. *See* Rule 2.6(a).

² Semptra is a North American public utility holding company whose operating companies include SoCalGas and SDG&E.

³ Application (A.)22-09-015 at 1.

implement gas storage related proposals effective January 1, 2024 through December 31, 2027.⁴ The resulting Decision (D.)24-07-009 and settlement agreement established in that proceeding will remain in effect until the Commission implements a final decision in the subsequent CAP proceeding.⁵

II. ISSUES TO BE CONSIDERED

Cal Advocates has preliminarily identified the following issues that the Commission should consider in determining whether to grant SEMPRA's various requests for relief. Cal Advocates intends to address these issues in written testimony. Cal Advocates' evaluation of the Application and supporting testimony is in early stages, and Cal Advocates may identify other issues as it continues its review and as the proceeding develops.

- Whether SEMPRA's proposal for its storage and balancing framework for 2027–2029, addressing capacities, proposed storage allocations, the balancing function, and reductions in storage inventory is just and reasonable?
- Whether SEMPRA's proposal for weather design is utilized for forecasting weather-sensitive market segments, including temperature design values for various reliability standards (e.g., average year, cold year, peak day), is just and reasonable?
- Whether SEMPRA's gas demand forecasts for residential and core commercial and industrial (C&I) customers are just and reasonable?
- Whether SEMPRA's proposal for the demand forecast for large electric generation (EG) customers, including utility electric generation (UEG) and exempt wholesale generation (EWG), is just and reasonable?
- Whether SEMPRA's proposal for noncore market segment demand forecasts (excluding large EG/cogen), consolidated demand forecasts, and calculation of core storage allocations is just and reasonable?
- Whether SEMPRA's proposal for a full, embedded cost study of Customer-related, Distribution-related, Transmission, and Storage

⁴ A.22-09-015 at 1.

⁵ Decision (D.)24-07-009 Appendix A at 3 (July 23, 2024).

costs to allocate the authorized revenue requirement across customer classes for the three-year period is just and reasonable?

- Whether SEMPRA's proposal for the allocation of authorized revenue requirement using a Long Run Marginal Cost (LRMC) method is just and reasonable?
- Whether SEMPRA's proposal modifying Backbone Transportation Service (BTS) to limit firm BTS available for sale and seeks to use Noncore Storage Balancing Account (NSBA) overcollections to offset the Firm Access Storage Rights Memorandum Account (FASRMA) under collection is just and reasonable?
- Whether SEMPRA's proposal for expanding core electric generation eligibility in SCG's Rule 23 to include usage from generators up to 10 megawatts (MW) and removal of the monthly therm threshold is just and reasonable?
- Whether SEMPRA's proposed 2027 natural gas transportation rates reflecting the cost allocation and demand forecast proposals is just and reasonable?
- Whether SEMPRA's proposal related to the availability of intrastate and interstate gas supplies is just and reasonable?
- Whether SEMPRA's proposed residential customer charges, including phased increases for non-CARE and CARE customers with corresponding usage rate offsets, are just and reasonable?

III. CATEGORIZATION, NEED FOR HEARING AND SCHEDULE

Cal Advocates agrees that this proceeding should be categorized as ratesetting and expects that evidentiary hearings will be needed.

IV. PROPOSED SCHEDULE

Cal Advocates opposes adoption of SEMPRA's proposed schedule because it does not provide sufficient time to conduct discovery, thoroughly investigate and analyze SEMPRA's requests, and prepare testimony. Cal Advocates proposes its schedule as follows.

EVENT PROPOSAL	SEMPRA PROPOSAL	CAL ADVOCATES
Prehearing Conference	December 16, 2025	December 16, 2025
Intervenor Testimony	February 24, 2026	April 24, 2026
Settlement Conference	March 16, 2026	May 15, 2026
Rebuttal Testimony	March 31, 2026	May 29, 2026
Evidentiary Hearings	May 4-8/11-15, 2026	July 6-10/13-17, 2026
Opening Briefs	June 2, 2026	August 3, 2026
Reply Briefs	June 30, 2026	August 31, 2026
Proposed Decision	October 2026	December 2026
Commission Decision	November 2026	January 2027

V. CONCLUSION

Cal Advocates respectfully requests that this proceeding be categorized as ratesetting; that the scope of this proceeding include, but not be limited to, the issues identified in this protest; and that the Commission set a schedule for this proceeding as noted in Cal Advocates proposed schedule, which will provide adequate time for discovery, analysis, preparation of testimony and preparation for evidentiary hearings.

Respectfully submitted,

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