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

Application of Southern California Gas Company
(U904G) for Authorization to Implement Revenue
Requirement for Advanced Meter Infrastructure
Replacement Project.

Application 25-12-019
(Filed December 30, 2025)

**RESPONSE OF SMALL BUSINESS UTILITY ADVOCATES TO THE APPLICATION
OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER
INFRASTRUCTURE REPLACEMENT PROJECT**

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February 2, 2026



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I. INTRODUCTION

Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Small Business Utility Advocates (SBUA) submits the following Response to the *Application of Southern California Gas Company (U904G) for Authorization to Implement Revenue Requirement for Advanced Meter Infrastructure Replacement Project* (Application).

In its Application, Southern California Gas Company (SoCalGas) “seeks authorization to implement a revenue requirement of approximately \$3.76 billion, based on a forecasted cost of approximately \$2.10 billion in operating and maintenance (O&M) and capital costs, and to establish a two-way balancing account to track the actual and authorized revenue requirement.”¹ SBUA submits this Response to obtain party status in this proceeding and preserve SBUA’s right to address and further analyze issues, as described below.

¹ Application, p.1.

II. SBUA’S BACKGROUND

SBUA’s mission is to represent the utility concerns of the small business community. Promoting reasonable rates for small commercial customers is central to this mission.² As of 2024, California has approximately 4.2 million small businesses, representing 99.9 percent of all businesses in the state. These firms employ about 7.0 million people, or 47.1 percent of the state’s workforce and play a vital role in the economy.³ Small businesses are not only vital to California’s economic health and welfare but also constitute an important class of ratepayers for utility companies directly affected by SoCalGas’s Application. The ratepayer interests of this class often diverge from residential ratepayers and larger commercial customers on a variety of utility matters. The rate impacts on small businesses are critical to consider given their substantial impact on California’s economy and the essential role of these businesses and their employees in driving the state’s future economic growth. For these reasons, SoCalGas’s Application should pay significant attention to, and consideration of, the impact on small commercial customers in their service territory.

III. SBUA’S INTERESTS IN THIS PROCEEDING

SoCalGas’s Application to replace its legacy advanced metering infrastructure (AMI) with a revenue requirement of approximately \$3.67 billion and create a two-way balancing account will have a substantial impact on its customers, both in terms of financial and possibly time as the physical meter is replaced. As stated in its’ Application, “The AMI system is also foundational to SoCalGas’s ability to provide safe, reliable, and affordable service to customers and provides

² See SBUA website at www.utilityadvocates.org.

³ U.S. Small Business Administration, Office of Advocacy, *2024 Small Business Profile: California* (2024), available at <https://advocacy.sba.gov/wp-content/uploads/2024/11/California.pdf>.

meaningful environmental benefits, in alignment with Commission and State objectives.”
Application at 2.

SBUA seeks to participate in this proceeding to advance the interests of small businesses, and to ensure that potential rate impacts on small business customers are fair and equitable and any stranded costs not adversely impact the small business class. SBUA maintains an interest in this proceeding to ensure that small business customers are considered as the Company schedules to replace the AMI meters. While SBUA anticipates that it will focus on these general issues, SBUA nonetheless reserves the right to address any other unforeseen issues that could arise that could impact small commercial customers. While SBUA remains concerned about potential rate impacts associated with the proposed AMI replacement, the Application indicates that a modernized AMI platform may provide operational and bill-management benefits that are relevant to small commercial customers. SBUA therefore would advocate to ensure that any such benefits are accessible to small commercial customers and are not effectively limited to residential or large customer segments.

As such, SBUA intends to fully participate in all phases of this Commission proceeding, including submitting comments, testimony, briefs, and participating in hearings - if necessary. SBUA intends to analyze other parties’ testimony and positions, with the intent to address any other issues that could substantially impact small commercial customers. To the extent that SBUA’s interests overlap with other parties, it will seek to actively collaborate with those other parties. SBUA’s participation in this proceeding will not prejudice any party or cause any delay to the proceeding.

At this time, SBUA is concerned that SoCalGas’s proposed schedule is overly ambitious given the scope of the proceeding. While we do not have a proposed schedule at this point, SBUA

believes a Meet and Confer of the parties to discuss the schedule would be beneficial prior to the Pre-hearing Conference.

IV. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to:

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Status: Information Only

V. CONCLUSION

SBUA looks forward to engaging with parties in this proceeding to ensure that costs and replacement schedules are adopted in a just and reasonable manner.

Respectfully Submitted,

By: /s/ Jennifer Weberski

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Dated: February 2, 2026