BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Southern California Gas Company (U 904 G) in Compliance with Ordering Paragraph 6 of Decision 24-12-076	A.26-01-009 (filed January 15, 2026)

SOUTHERN CALIFORNIA GENERATION COALITION MOTION FOR PARTY STATUS

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Dated: February 20, 2026

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MOTION FOR PARTY STATUS

I. INTRODUCTION

In accordance with Rule 1.4(a)(4), of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Southern California Generation Coalition ("SCGC") respectfully requests party status in the captioned proceeding. The proceeding commenced on January 15, 2026, when the Southern California Gas Company ("SoCalGas") filed Application ("A.") 26-01-009 entitled "Application of Southern California Gas Company in Compliance with Ordering Paragraph 6 of Decision 24-12-076" ("Application"). Public notice of the Application appeared in the January 21, 2026 Daily Calendar.

II. THE ENTITY IN WHOSE BEHALF THIS MOTION FOR PARTY STATUS IS MADE AND THE INTEREST OF SUCH ENTITY IN THIS PROCEEDING.

In accordance with Rule 1.4(b)(1), SCGC states that the entity on whose behalf this motion for party status is made is the Southern California Generation Coalition ("SCGC"). The members of SCGC own and operate utility scale natural gas fired electric generation facilities located in the SoCalGas service territory. SoCalGas is the sole provider of natural gas transmission service to the electric generation facilities of the SCGC members.

On October 1, 2025, in accordance with Ordering Paragraph 4 of the Commission's Decision ("D.") 24-12-076, the Commission's Energy Division served its 2025 Aliso Canyon

Biennial Assessment Report ("Biennial Assessment"). The Biennial Assessment recommends a reduction of ten billion cubic feet ("Bcf") in the maximum inventory level of SoCalGas's Aliso Canyon Natural Gas Storage Facility ("Aliso Canyon") from 68.6 Bcf to 58.6 Bcf.[1]

In its Application, SoCalGas requests that the Commission review the Energy Division's Biennial Assessment and decline to adopt the Biennial Assessment's recommended inventory reduction for Aliso Canyon.[2] SoCalGas contends that the proposed reduction in Aliso Canyon's inventory level would increase reliability risk and increase gas price volatility and energy costs.[3] SoCalGas proposes that it may be more appropriate to increase the maximum inventory level of Aliso Canyon if necessary to maintain reliability and just and reasonable energy rates.[4]

Reducing or, conversely, increasing the inventory capacity available at Aliso Canyon could affect the reliability of gas transmission service provided by SoCalGas to SCGC members and could affect the price of gas delivered through SoCalGas's transmission facilities to SCGC members. Accordingly, SCGC has an interest in this proceeding as contemplated in the Commission's Rule 1.4(b)(1) and seeks party status in this proceeding.

III. THE FACTUAL AND LEGAL CONTENTIONS THAT SCGC INTENDS TO MAKE THAT ARE REASONABLY PERTINENT TO THE ISSUES PRESENTED IN THIS PROCEEDING.

In accordance with the Commission's Rule1.4(b)(2), SCGC states that it intends to make factual and legal contentions that will be pertinent to the issues already presented in this proceeding by the Energy Division's Biennial Assessment and by SoCalGas's Application. In Investigation ("I.") 17-02-002, the proceeding which culminated in the Commission's issuance of D.24-12-076 which, in turn, resulted in the Energy Division issuing its Biennial Assessment

[1] Biannual Assessment, p. 5 (October 1, 2025).

[2] Application, p. 1.

[3] *Ibid*, pp. 1-2.

[4] *Ibid*, p. 2.

and SoCalGas filing its Application, SCGC recommended that the Commission should utilize biennial backcasts to set targets for resources to replace Aliso Canyon capacity. In D.12-07-076, the Commission summarized SCGC's recommendation as follows:

> SCGC recommends biennial backcasts instead of biennial forecasts when setting targets for resources to replace Aliso Canyon. SCGC states that the biennial analysis should use recorded data to establish whether the system could have been successfully operated on all days, including peak days, without Aliso Canyon. Next, SCGC recommends using hourly analysis to determine whether non-Aliso Canyon fields can be filled to full capacity by the beginning of the winter period in the absence of Aliso Canyon. Lastly, SCGC recommends using a range of historical years to capture a variety of weather types or including sensitivity studies to test major variables such as weather and equipment restrictions.[5]

In D.24-12-076, the Commission rejected SCGC's proposal to use a backcast rather than a forecast to determine the need for Aliso Canyon capacity, saying, "First, forecast numbers are the most appropriate and reasonable numbers to represent peak day gas demand."[6] However, the Commission added, "At this time, there is no need to require or prohibit the use of backcasting."[7]

The preparation of backcasts would be a tool for the Commission to use to test the recommendations presented by the Energy Division in the Biennial Assessment and by SoCalGas in the Application. SCGC intends to present backcasts to test the contentions of both the Energy Division and SoCalGas. Thus, the information that SCGC intends to present would be reasonably pertinent to the issues already presented in this proceeding by the Energy Division and by SoCalGas.

IV. SCHEDULE

The schedule in this proceeding should take into account the pendency of other proceedings which already have established due dates for testimony. SoCalGas proposes a

[5] D.24-12-076, p. 47 (December 19, 2024).

[6] *Ibid*, p. 49.

procedural schedule for this proceeding in which intervenor testimony would be due in August 2026.[8] SCGC's expert witness is engaged in the currently pending Pacific Gas and Electric Company ("PG&E') General Rate Case, A.24-12-009, in which intervenor testimony was due on February 13, 2026.[9] SCGC's expert witness is also engaged in the currently pending SoCalGas Cost Allocation Proceeding, A.25-09-014, in which intervenor testimony is due on May 15, 2026.[10] The schedule proposed by SoCalGas would result in a due date for intervenor testimony that is sufficiently removed from the due dates in the PG&E General Rate Case and the SoCalGas Cost Allocation Proceeding, so SCGC does not oppose SoCalGas's proposed schedule.

V. CONCLUSION.

For the reasons set forth above, SCGC respectfully requests that the Commission grant party status to SCGC in this captioned proceeding.

Respectfully submitted,

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[7] *Ibid*.

[8] Application, p. 7.

[9] A.25-05-009, Assigned Commissioner's Scoping Memo and Ruling, p. 19 (July 31, 2025).

[10] A.25-09-014, Assigned Commissioner's Scoping Memo and Ruling, p. 5 (December 23, 2025).