

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California Gas
Company (U904G) in Compliance with
Ordering Paragraph 6 of Decision
24-12-076.

Application 26-01-009

PROTEST OF THE PUBLIC ADVOCATES OFFICE

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I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this protest to the *Application of Southern California Gas Company (U904G) in Compliance with Ordering Paragraph 6 of Decision 24-12-076* (A.26-01-009 or Application). Decision (D.) 24-12-076 considered the continuing operation of Aliso Canyon Natural Gas Storage Facility (Aliso Canyon) and authorized Southern California Gas Company (SoCalGas) to operate it at a reduced storage capacity of 68.6 billion cubic feet (Bcf) from 86.2 Bcf, subject to biennial Commission review. Consequently, D.24-12-076 established the Energy Division Aliso Canyon Biennial Assessment to make recommendations on when to reduce or maintain the inventory levels stated in D.24-12-076. When the Biennial Assessment recommends a change to either the maximum storage limit or the reliability and economic analyses for Aliso Canyon, Ordering Paragraph 6 of Decision (D.) 24-12-076 requires Southern California Gas Company (SoCalGas) to "file an application requesting the Commission to review the recommendations and present its own recommendations, if any..."¹

Energy Division issued its *2025 Aliso Canyon Biennial Assessment Report Pursuant to D.24-12-076* (Biennial Assessment) on October 1, 2025.² The Biennial Assessment recommends a 10 billion cubic foot (Bcf) reduction for winter 2025/2026 but states that "given current forecasts for higher gas commodity prices in winter 2026-2027 ... a smaller increment or no reduction may be appropriate."³ In this Application, SoCalGas requests that the Commission reject the Biennial Assessment recommendation to reduce Aliso Canyon inventory level by 10 Bcf from the maximum storage level of 68.5 Bcf set in D.24-12-076. SoCalGas recommends the Commission authorize an

¹ D.24-12-076, Ordering Paragraph 6, at 77.

² Energy Division's Biennial Assessment was originally due June 15, 2025. The Commission's Executive Director granted extensions of time on June 13 and August 14.

³ Biennial Assessment at 4-5.

increase to Aliso Canyon's maximum inventory level up to its full pressure level of 86.2 Bcf, if necessary to maintain reliability and just and reasonable energy rates.⁴

Cal Advocates represents the interests of public utility customers and ratepayers before the Commission.⁵ Cal Advocates' mission is to obtain the lowest possible rate for service consistent with reliable and safe service levels, and the state's environmental goals.

II. ISSUES TO BE CONSIDERED

In addition to the issues stated in the Application, Cal Advocates recommends the following additional issues be considered within the scope of this proceeding:

- A. Whether SoCalGas's recommendation to increase the maximum storage limit at Aliso Canyon is within the scope of the authorization in Ordering Paragraph 6 of D.24-12-076.
- B. Whether authorizing SoCalGas to increase Aliso Canyon inventory above the maximum authorized level of 68.6 Bcf, for economic reasons, outweighs the safety risk mitigation concerns that form the basis for the maximum authorized level.
- C. Whether SoCalGas proposed increase of the Aliso Canyon inventory level to its original 86.2 Bcf would exceed the safe operating reservoir pressure of 3600 psi, given that Aliso Canyon maximum inventory is based on reservoir pressure, and not volume or economic reliability.
- D. Whether the Commission should require SoCalGas to present a comprehensive plan for the coordinated use of all active storage fields (Aliso Canyon, Honor Rancho, La Goleta, and Playa del Rey) to properly assess the reliability and rate impact claims in the Application.

Additionally, Cal Advocates recommends that the Commission schedule a joint workshop to be hosted by the Safety and Enforcement Division (SED) and the California Geologic Energy Management Division (CalGEM), approximately eight weeks after the issuance of a scoping memo in this proceeding. SED and CalGEM can provide

⁴ Application at 2.

⁵ Public Utilities Code Section 309.5.

information on any safety concerns regarding the safe operations of Aliso Canyon, including at both SoCalGas' proposed level and pressures and at the levels and pressures in the Biennial Assessment. Cal Advocates reserves the right to include other issues in the scope of this proceeding as it reviews the Application and conducts discovery.

III. CATEGORIZATION

SoCalGas proposes that the Commission categorize the Application as ratesetting. Cal Advocates supports the proposed ratesetting categorization.

IV. NEED FOR HEARING

SoCalGas states that evidentiary hearings are unnecessary. Based on its initial review of the Application and supporting testimony, Cal Advocates anticipates that hearings will be necessary.

V. SCHEDULE

SoCalGas proposes the following schedule.⁶ Cal Advocates recommends that intervenor testimony, rebuttal testimony, and hearings be scheduled in relation to the issuance of the Scoping Memo.

EVENT	DATE (SoCalGas Proposed)	DATE (Cal Advocates Recommended)
Workshop	Within 90 days of the filing of the Application	Within 90 days of the filing of the Application
Prehearing Conference	April 2026	April 2026
Scoping Memo	June 2026	June 2026
SED and CalGEM Workshop		Eight weeks after the Scoping Memo is issued.
Intervenor Testimony	August 2026	Twelve weeks after the Scoping Memo is issued.
Rebuttal Testimony	October 2026	24 weeks after the Scoping Memo is issued.
Hearings (if necessary)	December 2026	36 weeks after the Scoping Memo is issued.

⁶ Application at 7.

EVENT	DATE (SoCalGas Proposed)	DATE (Cal Advocates Recommended)
Opening Briefs	February 2027	April 2027
Reply Briefs	April 2027	June 2027
Proposed Decision	June 2027	August 2027
Commission Decision	July 2027	September 2027

VI. CONCLUSION

The Commission should include Cal Advocates’ recommended issues in the scope of this proceeding and adopt the proposal for a joint workshop with SED and CalGEM to address any safety concerns regarding the safe operations of Aliso Canyon, including at both SoCalGas’ proposed level and pressures and at the levels and pressures in the Biennial Assessment.

Respectfully submitted,

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