

**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 No. 26-01-009
(Filed January 15, 2026)

**RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY (U904G) TO SIERRA
CLUB MOTION TO COMPEL SOCALGAS TO PROVIDE INFORMATION
REQUESTED IN SIERRA CLUB'S FIRST SET OF DATA REQUESTS**

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Date: April 16, 2026

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Pursuant to Rule 11.3(b) of the California Public Utilities Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure (“Rules”), Southern California Gas Company (“SoCalGas”) hereby submits its Response to the Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club’s First Set of Data Requests, dated April 6, 2026, (Motion).

I. INTRODUCTION

Sierra Club’s Motion should be denied. The requests at issue are not relevant to any issue in this proceeding. Instead, Sierra Club seeks to convert this forward-looking proceeding into a vehicle for wholesale discovery from other dockets and for relitigation of matters the Commission has already addressed elsewhere.

SoCalGas has already provided substantive responses to the vast majority of Sierra Club’s data requests, many of which sought extensive historical information spanning multiple decades.¹ With respect to the narrow subset that remains at issue—Requests 1-1 through 1-4 and 1-16—SoCalGas acted reasonably and in good faith, including by offering during the meet-and-confer process to assess whether targeted information could be provided.² Sierra Club rejected that practical approach and filed its Motion the same day.

¹ Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club’s First Set of Data Requests, April 6, 2026, Appendix B.

² See Attachment A, Email from SoCalGas to Sierra Club, April 7, 2026.

The remaining requests do not warrant compelled responses. Requests 1-1 through 1-4 seek wholesale discovery from two prior proceedings for the purpose of evaluating “consistency” with prior statements—an improper basis for discovery and an issue that is not before the Commission. Request 1-16 suffers from the same defect. It seeks information regarding past gas price mitigation efforts, even though the Commission’s task here is prospective. Discovery rules do not authorize this sort of fishing expedition, particularly one that is completely untethered to relevance. Because Sierra Club has not demonstrated that the requested discovery is relevant to any issue in this proceeding or reasonably calculated to lead to the discovery of admissible evidence, the Motion should be denied in its entirety.

II. ARGUMENT

A. Requests 1-1 Through 1-4 Are Not Relevant and “Consistency” With Prior Proceedings Is Not a Proper Basis for Discovery

California Code of Civil Procedure Section 2017.010 and the Commission’s Rule 10.1 provide that “any party may obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter involved . . . if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.” Sierra Club has the burden to establish that the sought information is relevant or likely to lead to the discovery of relevant information, and here it has failed to meet that burden. Sierra Club’s Requests 1-1 through 1-4 seek “all responses to data requests” that SoCalGas provided to parties and the Energy Division in two separate Commission proceedings—together spanning approximately nine years—much of which is now stale.³ Sierra Club confesses it needs those to test whether SoCalGas’s positions in this proceeding are “consistent” with statements made elsewhere.⁴ But consistency across dockets is not itself an issue to be adjudicated in this proceeding. That lack of relevance is underscored by the proceedings from which Sierra Club seeks wholesale discovery.

Investigation (I.) 17-02-002 was a seven-year proceeding that examined reliance on the Aliso Canyon storage facility under system conditions, assumptions, and constraints that existed

³ Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club’s First Set of Data Requests, April 6, 2026, at 3.

⁴ Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club’s First Set of Data Requests, April 6, 2026, at 4; *see* Attachment A, Email from SoCalGas to Sierra Club, April 7, 2026.

at that time. In that proceeding, the Commission ultimately established a forward-looking framework for evaluating Aliso Canyon inventory levels in future proceedings.⁵ Moreover, the request is especially unwarranted because SoCalGas's data requests and responses in I.17-02-002 were served on the parties in that proceeding, and Sierra Club was itself a party there.⁶

I.23-03-008 addressed entirely different issues; namely, the causes of the 2022–2023 gas price spike, whether regulated entities contributed to those price increases, and potential mitigation measures. That proceeding has been fully litigated and resolved by final Commission decision.⁷ This application, by contrast, is focused on whether future modifications to Aliso Canyon inventory levels should be made. Sierra Club has not shown how production of entire discovery records from either proceeding would aid the Commission in deciding that forward-looking question.

Sierra Club also argues that wholesale production of all the discovery in those proceedings, rather than discrete items, would be more efficient and reduce the need for additional discovery.⁸ That assertion is backwards. Collecting, reviewing, and reproducing years of discovery responses—much of which is outdated, case-specific,⁹ or unrelated to the questions presented in this application—would impose a substantial burden without any showing of relevance. It would not streamline this proceeding; it would expand it. Sierra Club's argument acknowledges that even Sierra Club is unsure whether it needs *all* the discovery from the prior proceedings.

Lastly, it is also important to note that a scoping memo has not yet issued in this proceeding, and the issues to be adjudicated have not been formally defined by the Commission. In the absence of a defined scope, Sierra Club cannot demonstrate that wholesale discovery from

⁵ See Decision (D.) 24-12-076.

⁶ Investigation (I.) 17-02-002, Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, June 20, 2017, at 14.

⁷ See D.26-02-058.

⁸ Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club's First Set of Data Requests, April 6, 2026, at 5.

⁹ The wholesale discovery Sierra Club seeks was developed in response to specific questions, for specific purposes, in different proceedings. They are not necessarily complete or relevant for purposes of this proceeding.

prior proceedings is relevant to any issue before the Commission. This further confirms that the requests are untethered to the issues that will ultimately be addressed in this proceeding.

B. Request 1-16 Is Not Relevant Because It Seeks Backward-Looking Information That Does Not Inform the Issues in This Proceeding

Sierra Club's Request 1-16 seeks a backward-looking "list" of mitigation measures used during winter 2022–2023.¹⁰ That request suffers from the same fundamental defect as Requests 1-1 through 1-4: it is not relevant to the issues in this proceeding. The issue here is not whether SoCalGas's gas procurement methods produced just and reasonable rates during winter 2022–2023, but whether future changes to Aliso Canyon inventory levels are warranted.

Questions about SoCalGas's procurement during that period were addressed in other Commission proceedings and are not at issue in this forward-looking application. I.23-03-008 examined the causes and contributors to the 2022–2023 gas price spike, whether any regulated entity caused or contributed to that spike, and what actions should be taken to avoid similar spikes in the future and mitigate ratepayer harm. To the extent Sierra Club seeks to revisit those same issues here, its request appears to reflect dissatisfaction with the outcome of that adjudicated docket rather than any need for discovery relevant to this forward-looking proceeding. Separately, SoCalGas's annual Gas Cost Incentive Mechanism (GCIM) Application addresses whether SoCalGas's gas procurement activities during the prior GCIM Year resulted in gas costs below or above the established GCIM benchmark, which is the mechanism through which the Commission evaluates the reasonableness of SoCalGas's gas procurement and hedging decisions on behalf of core customers.

The question here is forward-looking: whether future modifications to Aliso Canyon inventory levels should be made. A backward-looking compilation of measures taken under specific historical market conditions does not inform that inquiry. Nor does Sierra Club's assertion that historical information is more "trustworthy"¹¹ cure the relevance deficiency, particularly where the Commission has already examined that period and the GCIM process continues to provide structured Commission oversight of SoCalGas's procurement performance. Further, SoCalGas continuously evaluates strategies to address observed and anticipated market

¹⁰ Sierra Club Motion to Compel SoCalGas to Provide Information Requested in Sierra Club's First Set of Data Requests, April 6, 2026, at 5.

¹¹ *Id.*

volatility. A historical snapshot from winter 2022–2023 therefore says little about the tools or measures that may be appropriate in the different conditions presented in the future.

III. CONCLUSION

For the foregoing reasons, SoCalGas respectfully requests the Commission deny Sierra Club’s Motion.

Respectfully submitted on behalf of
Southern California Gas Company,

By: /s/ Setareh Mortazavi
SETAREH MORTAZAVI

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Date: April 16, 2026

ATTACHMENT A

From: Mortazavi, Setareh
Sent: Tuesday, April 7, 2026 5:07 PM
To: Katherine Ramsey; tyson@cleanstrat.com
Cc: Healy, Gregory
Subject: RE: SC-SCG Meet & Confer - Sierra Club DR Set 1
Attachments: A.26-01-009 NDA Sierra Club.docx

Katie,

Thank you for meeting and conferring yesterday regarding Sierra Club Data Request #1. This email memorializes our discussion and the agreements reached, and attaches the Non-Disclosure Agreement (NDA) discussed so we can provide further responses.

Questions 1–2

SoCalGas explained that the requests seek information from a separate, seven-year-long proceeding involving extensive and stale information. SoCalGas offered to assess the volume of responsive materials and revert within 1–2 days. Sierra Club declined this approach and indicated it intends to proceed with a motion to compel.

Questions 3–4

Sierra Club argued that the overlapping issue in I.23-03-008 with this proceeding is Aliso Canyon's impact on prices. SoCalGas explained that I.23-03-008 has been fully adjudicated and involved numerous issues that are irrelevant to this proceeding. SoCalGas offered to provide discovery, if any, on the limited issue identified by Sierra Club (Aliso Canyon's impact on prices). Sierra Club declined this proposal and indicated it would prefer to review all discovery from that proceeding and make its own determination of relevance. Sierra Club also emphasized that its primary goal with these requests is whether SoCalGas's representations in this proceeding are consistent with its positions in prior proceedings. I do not see how that is relevant to this proceeding.

Question 8

SoCalGas has provided data from 2009 that is available on its electronic platform. The parties agreed that SoCalGas will supplement its response with pre-2009 data if available.

Question 11

The parties agreed that SoCalGas will supplement its response with available daily HDD data that is not linked to the 2024 CGR.

Question 12

Sierra Club clarified that it seeks data from 1990 to present. SoCalGas will assess what responsive data is available.

Question 13

Sierra Club clarified it seeks data beginning in 2000. SoCalGas will assess availability of information for the 2000–2008 period.

Question 14-15

The parties agreed these requests would be interpreted as seeking any underlying calculations, analyses, or spreadsheets supporting testimony, and that SoCalGas will supplement its response if applicable.

Question 16

SoCalGas maintains its objections. Sierra Club explained that it is seeking information regarding how SoCalGas would mitigate future high gas prices. SoCalGas explained that Sierra Club could propound a revised request framed in a forward-looking manner.

Question 19

The parties agreed that SoCalGas will supplement its response with daily balance, inventory, and injection/withdrawal data from approximately 2012, and will indicate whether earlier data is unavailable.

Question 20

The parties agreed that SoCalGas will supplement its response with UBS Program costs, revenues, and net revenues to ratepayers. SoCalGas will also provide additional information regarding how it identifies and reaches out to potential UBS Program subscribers.

Question 21

The parties agreed that no additional information needs to be provided.

Question 24

The parties agreed that SoCalGas will supplement its response with available curtailment data, including customer classes, from approximately 2017, and indicate whether earlier data is unavailable.

Question 25

The parties agreed that SoCalGas will clarify in a supplemental response that it does not maintain a daily WACOG.

Question 26

As discussed, SoCalGas is providing an NDA herewith so a supplemental response can be provided.

Question 27

Sierra Club clarified that the request did not specify a time period and indicated it seeks annual costs for each year since 2000. SoCalGas indicated that data is available from approximately 2008 and will supplement its response within 10 business days.

Thank you,

Setareh Mortazavi
Senior Counsel

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-----Original Appointment-----

From: Katherine Ramsey <katherine.ramsey@sierraclub.org>
Sent: Friday, March 27, 2026 4:26 PM
To: Katherine Ramsey; Healy, Gregory; Mortazavi, Setareh; tyson@cleanstrat.com
Subject: SC-SCG Meet & Confer - Sierra Club DR Set 1
When: Monday, April 6, 2026 1:00 PM-1:45 PM America/Los_Angeles.
Where: <https://meet.google.com/srt-ywfz-nsv>

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Sierra Club requests a meet and confer with SoCalGas regarding the Company's responses to the data requests listed below.

Data Requests for Discussion

SC 1-1: Discuss SCG objection

SC 1-2: Discuss SCG objection

SC 1-3: Discuss SCG objection

SC 1-4: Discuss SCG objection

SC 1-8: Data provided is monthly, not daily

SC 1-11: Data provided is monthly, not daily and fails to extend beyond 2023

SC 1-12: Discuss SCG objection

The webpage SCG refers to does not include all data requested; if SCG does not retain data earlier than 2005, please state so.

SC 1-14: Witness asserts to have completed multiple calculations

SC 1-15: Witness asserts to have completed multiple calculations

SC 1-16: Discuss SCG objection

SC 1-19: Data provided is too aggregated

on how the Company identifies and reaches out to a potential UBS program subscriber, including any statements on prices and terms of the program.

SC 1-21: Please provide additional detail

did not supply the number of customers by customer class. Please specify which advice letters relate to customer curtailment.

the G-CP tariffs linked in response refer to but do not include the daily WACOG. If SCG does not record this data, please state so.

SC 1-26: Please send a proposed NDA

for each year since 2000. SCG should explain whether it will produce that information or whether an additional data request is necessary.

Monday Apr 6, 2026 · 1pm – 1:45pm (Pacific Time - Los Angeles)

Katherine Ramsey - org
ghealy@socalga
smortazavi@socalga
tyson@cleanstra

[View all guest info \[calendar.google.com\]](#)

Reply for smortazavi@socalga

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