

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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A2512019

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

Application 25-12-019

**PUBLIC ADVOCATES OFFICE MOTION TO COMPEL  
INFORMATION RELATED TO SOUTHERN CALIFORNIA GAS COMPANY  
ADVANCED METERING INFRASTRUCTURE REPLACEMENT PROJECT  
APPLICATION; [PROPOSED] ORDER**

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## I. INTRODUCTION

Pursuant to Public Utilities Code Sections 309.5(e), 314, 581, 1822 and Rules 10.3, 10.4, 11.1, and 11.3 of the California Public Utilities Commission’s (Commission’s) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby moves to compel Southern California Gas Company (SoCalGas) to respond to data requests (DR) originally issued on March 6, 2026,<sup>1</sup>

In Application (A.) 25-12-019 SoCalGas seeks authorization to implement a revenue requirement for its Advanced Meter Infrastructure Replacement (AMIR) Project in the amount of approximately \$3.76 billion (from 2026-2071), and to establish a two-way balancing account to track the actual and authorized revenue requirement.<sup>2</sup> In dispute are two DRs that request a working copy of the model utilized by SoCalGas to calculate its proposed revenue requirement (the model), with all calculations and formulas intact and accessible.<sup>3</sup> SoCalGas contends that it “is unable to provide the fully functional Excel model,” because its design relies on internal inputs “configured to function exclusively within SoCalGas’s internal network.”<sup>4</sup>

Cal Advocates requires a functional copy of the model to assess the reasonableness of SoCalGas’ Application. SoCalGas’ model is a “black box”. Only SoCalGas knows the formulae, operations, and assumptions it uses to produce its output. Absent an understanding of these and other functions inherent to the model neither Cal Advocates nor the Commission can determine the reasonableness, and more specifically

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<sup>1</sup> See Appendix 1, Cal Advocates Data Requests, PubAdv-SCG-009-SBD (DR 9) at Question 2a. On April 6, 2026, Cal Advocates reiterated its request. See Appendix 3, A2512019 Public Advocates Data Request MTN-022 (DR 22), April 06, 2026, at Question 1b.

<sup>2</sup> A.25-12-019 *Application for Authorization to Implement Revenue Requirement for Advanced Meter Infrastructure Replacement Project by Southern California Gas Company* (Application), December 30, 2025, Introduction at 2 and Ch.V at 3.

<sup>3</sup> DRs 9 and 22 requested a working copy of the model in Excel with all calculations, formulas and coding intact so that Cal Advocates could understand how the utility arrived at its proposal and consider different scenarios.

<sup>4</sup> See Appendix 4, A2512019 SoCalGas Response To Cal Advocates Data Request MTN-022 (SCG Response to DR 22), April 20, 2026, at Response 1a.

the accuracy, of SoCalGas' proposed revenue requirement. SoCalGas' refusal, or inability, to provide its model unduly delays and unreasonably impedes Cal Advocates' review of the Application.

Though given multiple opportunities to do so, SoCalGas has yet to identify any lawful basis for its refusal to provide the requested model. Instead, SoCalGas argues that it does not provide the model to external parties.<sup>5</sup> SoCalGas further argues that workpapers (which were never requested or shown to have any bearing on Cal Advocates' request) were provided and suffice in lieu of the model.<sup>6</sup> SoCalGas goes on to state that it is unable to provide the fully functional Excel model because its formulas are configured to function exclusively within its internal network.<sup>7</sup> These are mere argument, premised on unsupported claims, after the fact assumptions, and purported facts that have little if anything to do with this proceeding.

SoCalGas also asserts that the data requests are not relevant to this proceeding. Specifically, according to SoCalGas, entities that use computer models are not obligated to provide both documentation that explains the model and timely and reasonable access to the model.<sup>8</sup> Thus, SoCalGas objects to the request for the model as "overly broad and unduly burdensome."<sup>9</sup> SoCalGas' objections defy both law and logic; SoCalGas suggests that rather than require SoCalGas to show how it calculated its requested revenue requirement, the Commission must trust that this multi-billion dollar project, spanning

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<sup>5</sup> Appendix 2, A2512019 SoCalGas Response to Cal Advocates Data Request MTN-009 (SCG Response to DR 9), March 20, 2026, at Response 2a. See also Appendix 4, A2512019 SoCalGas Response to Cal Advocates Data Request MTN-022 (SCG Response to DR 22), April 20, 2026, at Response 1a.

<sup>6</sup> Appendix 2, SCG Response to DR 9 at Response 2a. SoCalGas also claims that, given the model's complexity and dependency on external files located within its internal network, it cannot provide the requested details about the model's functioning. This claim is the subject of Cal Advocates separate Motion to Strike.

<sup>7</sup> See Appendix 4, SCG Response to DR 22 at Response 1a.

<sup>8</sup> Compare Appendix 4, SCG Response to DR 22 at Response 1 (objecting to request for production of computer model as argumentative, overly broad, and burdensome) with Public Utilities Code Sections 581 and 1822 (requiring utilities to produce requested tabulations, computations, and computer models for verification) and the Commission Rules of Practice and Procedure Rules 10.3 and 10.4.

<sup>9</sup> See Appendix 4, SCG Response to DR 22 at Question 1b.

over four decades, is just and reasonable. SoCalGas' position is unreasonable and inconsistent with its obligations under Sections 581 and 1822.<sup>10</sup>

Cal Advocates issued the data requests as a party to this proceeding, consistent with its prior practices, and in furtherance of its statutory duty to advocate on behalf of SoCalGas' customers.<sup>11</sup> The information sought is necessary to conduct a reasonable review of SoCalGas' proposed multi-billion dollar revenue requirement request. As shown below, any objection on the basis of relevance is misplaced, and claims of undue burden are without merit. Moreover, to the extent that a burden is imposed, that burden is both reasonable and reasonably borne by SoCalGas as the burden is of SoCalGas's own creation. SoCalGas knew or should have known that it has a statutory obligation to produce its computer model. And, SoCalGas should have expected that Cal Advocates would request and need access to its model. Nonetheless, SoCalGas chose to base its testimony on a new and unusual model it developed, and that it claims to be unable provide to Cal Advocates. SoCalGas unilaterally decided to make this modelling change and provides no rationale for this change.

## **II. BACKGROUND**

The Application describes the Advanced Meter Infrastructure system, for approval is sought, as the "backbone of SoCalGas's meter-to-cash process...for more than six million customer meters..." and "foundational to SoCalGas's ability to provide safe, reliable, and affordable service to customers and provide meaningful environmental benefits, in alignment with Commission and State objectives."<sup>12</sup> Cal Advocates' protest notes that despite the significance of the project and magnitude of the revenue requirement, the Application provides cursory to no support for threshold issues such as cost-effectiveness, risk values, the value of stranded assets, cost distribution between

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<sup>10</sup> Unless otherwise stated, all statutory references are to the California Public Utilities Code.

<sup>11</sup> Public Utilities Code Section 309.5.

<sup>12</sup> Application at 3.

2036 and 2071, and tracking expenditures.<sup>13</sup> Cal Advocates’ review of the Application to date has raised numerous questions about SoCalGas’ costs and tracking of costs.

To address questions related to SoCalGas’ computational assumptions, Cal Advocates issued several DRs for information. Among its DRs, PubAdv-SCG-009-SBD (DR9) and PubAdv-SCG-022-CC3 (DR22) seek a working copy of the revenue requirement model. Specifically, on March 6, 2026 Cal Advocates sent DR9, with a due date of March 20, 2026.<sup>14</sup> This DR asks SoCalGas to “provide a working copy of the model used to calculate the total revenue requirement in Excel, with all calculations and formulas intact.”<sup>15</sup> SoCalGas’ response to DR9, transmitted March 20, 2026, provided workpapers that did not contain the model that Cal Advocates requested.<sup>16</sup> On April 6, 2026, Cal Advocates sent DR22, with a due date of April 20, 2026.<sup>17</sup> DR22 asked SoCalGas to explain why it considers Cal Advocates an external party and reiterated Cal Advocates’ request for a working copy of the model SoCalGas used to calculate the total revenue requirement.<sup>18</sup> SoCalGas’ response to DR 22 states that SoCalGas is unable to

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<sup>13</sup> A.25-12-019 Public Advocates Office Protest of SoCalGas’ Application for AMIR Project, at 2-3, February 2, 2026.

<sup>14</sup> Appendix 1, DR9.

<sup>15</sup> Appendix 1, DR9 at Question 2. Question 2a refers to SoCalGas’ Application, Chapter V “Regulatory Accounting, Cost Recovery, Revenue” at PG/SW/JC-5 and requests SoCalGas provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact.

<sup>16</sup> Appendix 2 SCG Response to DR 9 at Response 2a (SoCalGas objected to this request on March 20, 2026, confirming that a model exists, but stating that it does not provide this model “to external parties due to the model’s complexity and its dependence on external files located within SoCalGas’ internal network, which are essential for its property functionality. In lieu of the model, SoCalGas is providing detailed workpapers...”).

<sup>17</sup> Appendix 3, DR 22. This DR reiterates the question from DR 9 2a because SoCalGas’ response to DR 9 did not provide the computer model or its underlying inputs and assumptions.

<sup>18</sup> Appendix 3, DR 22 at Question 1 (Question 1 references “PubAdv-SCG-009-SBD (DR9) Question 2a” and states 1a) Please explain why SoCalGas considers Cal Advocates an external party that should not be provided SoCalGas’ revenue requirement model due to the model’s complexity and its dependence on external files located within SoCalGas’ internal network. 1b) Please provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact and accessible. See Appendix 3.).

produce its computer model.<sup>19</sup> SoCalGas objected to DR 22 on the basis that the request for an explanation was “argumentative”<sup>20</sup> and the request to produce the computer model was “overly broad and unduly burdensome.”<sup>21</sup> The DRs and SoCalGas’ responses about the model are attached hereto as Appendices 1-4.

On April 24, 2026, Cal Advocates met with SoCalGas in a good faith attempt to resolve the dispute, as required by Rule 11.3(a).<sup>22</sup> SoCalGas knew that Cal Advocates objective in this meet and confer was to secure access to a working copy of the model used to calculate the total revenue requirement.<sup>23</sup> For the first time in this proceeding, SoCalGas claimed that the model used in the development of the revenue request for the AMIR Project, is a “PET Model.” A PET Model is different from the results of operations (RO) models regularly used and shared with Cal Advocates in general rate cases (GRCs).<sup>24</sup> SoCalGas also claimed that unlike RO models shared in GRCs, the PET model could not be transferred in a functional mode because it was dependent on “files located within SoCalGas’ internal network.”<sup>25</sup>

SoCalGas did not come to meet and confer prepared. The SoCalGas representatives were either unwilling or unable to explain why its model was developed in a non-transferable manner even though it projects costs for essential infrastructure, which are reviewable by the Commission. Nor was SoCalGas then willing or able to propose an alternative way for Cal Advocates to use a functional, working copy of the

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<sup>19</sup> Appendix 4, SCG Response to DR 22 at Response 1b (“SoCalGas is unable to provide the fully functional Excel model in its current state as requested because the model relies on internal data sources and embedded macros that are configured to function exclusively within SoCalGas’s internal network environment. These components are integral to the model’s functionality.”)

<sup>20</sup> SCG Response to DR 22 at Response 1a (stating Question 1a “is argumentative... [A]n external party is any entity, organization, or agency that is not part of SoCalGas and that does not operate within SoCalGas’s internal network or system environment.”)

<sup>21</sup> Appendix 4, SCG Response to DR 22 at Response 1b (“SoCalGas objects to this request as overly broad and unduly burdensome”).

<sup>22</sup> The parties attended a WebEx conference between 1:00-1:23 pm on April 24, 2026.

<sup>23</sup> See Appendix 5, Request for Meet and confer, Email sent by Cal Advocates. April 21, 2026.

<sup>24</sup> Explained by Counsel for SoCalGas during meet & confer, April 24, 2026.

<sup>25</sup> Appendix 4, SCG Response to DR 22 at Response 1a.

model.<sup>26</sup> Instead, SoCalGas stated that they would have to go back to their model engineers and insisted on being given more time.<sup>27</sup> Notably, SoCalGas made no attempt to explain why they had not brought essential personnel to the meet and confer. This, despite the fact that the issues and need for engineering expertise were clearly drawn and was reasonably foreseeable.

Ten days after the due date for the response to DR22, on May 1, 2026, SoCalGas provided a supplemental response.<sup>28</sup> Instead of the working copy Cal Advocates had requested, SoCalGas proposed alternatives to making the model available to Cal Advocates.<sup>29</sup> In addition to being unreasonable, none of the proposed alternatives provide the requested insights into the workings of the model.

### **III. CAL ADVOCATES' MOTION TO COMPEL SHOULD BE GRANTED**

#### **A. Whether or not SoCalGas Generally Provides the Requested Information to External Parties is Irrelevant.**

SoCalGas is refusing to answer Cal Advocates' request for its revenue requirement model because, according to SoCalGas, Cal Advocates is an external party that does not operate within SoCalGas' internal network.<sup>30</sup> SoCalGas' objects to Cal Advocates' question about why it considers Cal Advocates an external party as argumentative. SoCalGas' refusal and objection are both unwarranted and contrary to law.

As an initial matter, neither the Commission nor California Courts allow discovery to be withheld on claims that the requesting party is an external party. On the contrary, the California Code of Civil Procedure section 2017.010 broadly provides that:

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<sup>26</sup> SoCalGas also claims that the model's complexity and dependency on external files located within its internal network prevent it from providing a properly functioning model to Cal Advocates. See Appendix 2, SCG Response to DR 9 at Response 2a. As SoCalGas claims it cannot provide the requested information, this claim is addressed separately by Cal Advocates in a Motion to Strike.

<sup>27</sup> Appendix 6, Email memorializing Meet & Confer sent by Cal Advocates, April 24, 2026.

<sup>28</sup> Appendix 8, SoCalGas Supplemental Response to PAO DR 9 (SCG Supplement to DR 9), May 01, 2026.

<sup>29</sup> Appendix 8, SCG Supplement to DR 9 at Supplemental Response 2a.

<sup>30</sup> See Appendix 2 SCG Response to DR 2 at Response 2a.

...any party may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter involved in the pending action or to the determination of any motion made in that action, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.

In this regard, Rule 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure similarly provides that:

any party may obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.

SoCalGas' determination to withhold discovery because Cal Advocates is an external party and objection to questioning this determination is particularly egregious. In relevant part, Public Utilities Code Section 309.5 provides that Cal Advocates:

may compel the production or disclosure of any information it deems necessary to perform its duties from any entity regulated by the commission, provided that any objections to any request for information shall be decided in writing by the assigned commissioner or by the president of the commission, if there is no assigned commissioner.

Thus, rather than exempt SoCalGas from discovery because Cal Advocates is an external party, the Code of Civil Procedure, Commission Rules of Practice and Procedure, and California Public Utilities Code make clear that because SoCalGas is a public utility that is regulated by the Commission, it must provide information in response to Cal Advocates requests.

**B. SoCalGas Must Answer Questions regarding Tabulations, Computations, and associated Information.**

Cal Advocates requested a working copy of SoCalGas' revenue requirement model in Excel with all calculations and formulas intact.<sup>31</sup> SoCalGas refused to comply with this request based on claims that its model is too complex and cannot function outside of the

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<sup>31</sup> See Appendix 1 DR 9 at Question 2a and Appendix 3 DR 22 at Question 1.

utility's internal network.<sup>32</sup> SoCalGas' refusal to comply is at odds with Public Util. Code Section 581, which requires utilities to provide such information:

Every public utility shall furnish to the commission in such form and detail as the commission prescribes all tabulations, computations, and all other information required by it to carry into effect any of the provisions of this part, and shall make specific answers to all questions submitted by the commission.<sup>33</sup>

Consistent with the above, SoCalGas' parent company (Sempra) regularly provides copies of its results of operations (RO) models with, tabulations and computations, to verify proposed revenue requirements to Cal Advocates in GRCs.<sup>34</sup> Here however, SoCalGas states it determined to use a model that is different from the RO Model used in GRCs, a model that does not allow it to provide the tabulations, computations, and other information requested in Cal Advocates' DRs.<sup>35</sup> SoCalGas' claim that it uses a novel model, one that is different from its typical RO Model, only increases the need for Cal Advocates and the Commission to carefully scrutinize SoCalGas' model. To find SoCalGas' use of this model reasonable, the Commission must order SoCalGas to provide Cal Advocates with a working model.

**C. SoCalGas's Unilateral Provision of Workpapers in Lieu of their Model is Inadequate and Irrelevant.**

SoCalGas claims that the workpapers it provided in lieu of the model requested by Cal Advocates satisfy its discovery obligation.<sup>36</sup> This is false. As an initial matter, Cal Advocates never requested nor agreed to receive workpapers in lieu of response to its request. Second, the workpapers are not responsive to the DR. Among other things, rather than the requested tabulations, computations, and associated information, the

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<sup>32</sup> See Appendix 2 SCG Response to DR 9 at Response 2a.

<sup>33</sup> Public Utilities Code Section 581.

<sup>34</sup> Sempra 2024 GRC A.22-05-015 & A.2-05-016, Sempra 2017 GRC A.17-10-007 & A. 17-10-008, Sempra 2016 GRC A.14-11-003.

<sup>35</sup> See Appendix 6, Email memorializing Meet & Confer sent by Cal Advocates, April 24, 2026.

<sup>36</sup> See Appendix 2 SCG Response to DR 9 at Question 2a.

workpapers contain disorganized data summaries and omit the requested calculations or formulas.<sup>37</sup> The information requested by Cal Advocates is specifically identified as permissible by Public Utilities Code Section 581.<sup>38</sup> SoCalGas' attempt to substitute workpapers for the requested responses improperly compromises Cal Advocates' discovery, unreasonably burdens Cal Advocates, and significantly compromises our ability to participate in this proceeding.

**D. SoCalGas must be Ordered to Comply with Section 1822 and Provide its Computer Model.**

SoCalGas objects to Cal Advocates' request for a working copy of the model as overly broad and unduly burdensome.<sup>39</sup> It is not. As an initial matter, that a party claiming undue burden bears the burden of showing that burden by providing evidence of the amount of work that would be required to comply with the request, is well established law.<sup>40</sup> Neither in its objections, at the meet and confer, nor at any point to date has SoCalGas offered any support for its overly broad and unduly burdensome contention. Indeed, as noted above, SoCalGas did not even bother to bring subject matter experts (who might opine on the burden imposed) to the meet and confer and has not followed up on representations that it would consult them about alternatives except to confirm its inability to provide a functioning model.<sup>41</sup>

Moreover, SoCalGas's undue burden objection is void as a matter of law. Public Utilities Code Section 1822 specifically requires utilities to provide computer models

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<sup>37</sup> See Appendix 2, SCG Response to DR 9 at Attachment A.

<sup>38</sup> Public Utilities Code Section 581 ("Every public utility shall furnish to the commission in such form and detail as the commission prescribes all *tabulations, computations*, and all other information required by it to carry into effect any of the provisions of this part, . . .") (emphasis added).

<sup>39</sup> See Appendix 4 SCG Response to DR 22 at Question 1b.

<sup>40</sup> See *Williams v. Superior Court* (2017) 3 Cal.5th 531, 540 ("the burden of justifying any objection and failure to respond remains at all times with the party resisting" the discovery request).

<sup>41</sup> Appendix 8, SCG Supplement to DR 9 at 3. In its Supplement to DR9 SoCalGas offered alternatives to producing the model such as running scenarios on behalf of Cal Advocates and/or making the model available at SoCalGas' facility. As discussed in Sections F. and G. below, SoCalGas' proposed alternatives are unreasonable and irrelevant, in part because the alternatives do not satisfy SoCalGas' obligation to produce the model for verification pursuant to Public Utilities Code Section 1822.

used, along with their formulae and programs. In relevant part, Public Utilities Code Section 1822 directs that:

- (a) Any computer model that is the basis for any testimony...shall be available to, and subject to verification by, the Commission and parties to the hearing or proceeding...
- (b) Any testimony presented...on a computer model shall include a listing of all the equations and assumptions built into the model.
- (f) Each party shall have access to the computer programs and models of each other party.

Public Utilities Code Section 1822 does not allow utilities to develop and depend on models to support their request, and then avoid scrutiny of those models on claims that sharing them is unduly burdensome; Public Utilities Code Section 1822 requires utilities to provide computer models on which they rely for testimony.<sup>42</sup> Here, SoCalGas relies on its model for testimony. SoCalGas cannot both use the model and refuse to make the model available in a functional manner when the Commission, let alone any party to the proceeding, requests it. Consistent with Public Utilities Code Section 1822, SoCalGas must be ordered to make the model available to Cal Advocates in a functional manner.

**E. SoCalGas Must be Ordered to Comply with Rule 10.3 of the Commission’s Rules of Practice and Procedure.**

In response to Cal Advocates’ request for an explanation of why the PET Model is so distinct from RO Models, SoCalGas states that “the PET model was built for internal use ...link[ed] to internal files and there is no user guide to walk a user through the model’s functionality or process.”<sup>43</sup> Thus, SoCalGas admits that it is using a model built for “internal use” as the foundation for its public request for ratepayer funds. This explanation does not free SoCalGas from the obligations imposed by Rule 10.3. Rule 10.3 delineates the type of documentation a party that relies on computer models must

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<sup>42</sup> Public Utilities Code Section 581.

<sup>43</sup> See Appendix 6 Email Progress Report, April 28, 2026, sent by SoCalGas.

provide to any party upon request. The information that must be provided under Rule 10.3 specifically includes:<sup>44</sup>

- (1) Source of input data
- (2) Input file with a complete set of input data
- (3) Documentation sufficient for an experienced professional to understand the basic logical processes..., including but not limited to a manual which includes (A) a complete list of variables B) a complete description of how the model operates and logic with a description of equations, algorithms, flow charts, other descriptive techniques ... (C) a description of diagnostics and output report formats to understand the model's operation.
- (4) A complete set of output files...
- (5) A description of post-processing requirements of the model output.

SoCalGas' workpapers lack nearly all of the details above. Most tellingly, sources of input data, organized input data, calculations, live formulas or logic to support the model's operation are not included in the workpapers SoCalGas provided.<sup>45</sup> Rather than assist Cal Advocates' analysis, the workpapers would create substantial delays - it would take 3 to 5 modeling experts several months to get even close to understanding how SoCalGas arrived at its proposed revenue requirement with the information provided in the workpapers, if it could be done at all.<sup>46</sup>

**F. SoCalGas' Proposed Alternatives to Making the Model Available, while Maintaining Control Over it, are Unreasonable.**

In its May 1, 2026 supplemental response, SoCalGas offered alternatives to providing a functioning model to Cal Advocates.<sup>47</sup> The alternatives include: running scenarios on behalf of Cal Advocates, providing a comprehensive walkthrough of the

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<sup>44</sup> Rule 10.3(a)(2)(A)-(C).

<sup>45</sup> See Appendix 2, SCG Response to DR 9 at Attachment A. See also Rule 10.3(a)(3).

<sup>46</sup> Moreover, it would require the experts to do a lot of guess work to arrive at the proposed values.

<sup>47</sup> See Appendix 8, SCG Supplement to DR 9.

model, and/or making the model available at SoCalGas' facility.<sup>48</sup> These alternatives are unreasonable for several reasons.

Having SoCalGas run scenarios on Cal Advocates' behalf would require Cal Advocates, the ALJ, and the Commission to take SoCalGas' word for it that the outcomes were reached in the same formulaic way and with the same assumptions as those supporting SoCalGas' request. As such, parties and the Commission would not be able to verify the outcomes of SoCalGas' model, as Section 1822 requires.<sup>49</sup> Moreover, requiring Cal Advocates to present its analytical ideas to SoCalGas is patently improper as it would require Cal Advocates to divulge its confidential and privileged deliberative processes and legal strategies.<sup>50</sup> "In doing the public's business, it is essential for Commission staff to be able to have confidential internal draft documents, to brainstorm ideas, or take contrary positions."<sup>51</sup>

SoCalGas' second approach a comprehensive walkthrough, without the documentation required by Rule 10.3, is also unreasonable. This approach omits the detail necessary to understand how the model works. It would be like showing Cal Advocates the results on a calculator without showing them the numbers pressed to arrive at the results. And, importantly, trusting the results of the model utilized by SoCalGas to calculate its proposed revenue requirement without verification or scrutiny of the model would result in an improper delegation of Commission's obligation to consider the reasonableness of SoCalGas' revenue request.<sup>52</sup> This is unreasonable on its face,

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<sup>48</sup> See Appendix 8, SCG Supplement to DR 9.

<sup>49</sup> Public Utilities Code Section 1822(a).

<sup>50</sup> California Code of Civil Procedure § 2018.030 (attorney work product privilege); Government Code section 7922.000; see *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325, 1342 (Times Mirror) ("The key question in every case is whether the disclosure of materials would expose an agency's decisionmaking process in such a way as to discourage candid discussion within the agency and thereby undermine the agency's ability to perform its functions").

<sup>51</sup> Resolution L-634, *Affirming Staff's Redaction And Withholding Of Records Requested In Public Records Act #25-35 And Denying Requestor Seth Rosenfeld's Appeal*, August 15, 2025, at 15-16 citing *Times Mirror Co. v. Superior Court, supra*, 53 Cal.3d at 1341.

<sup>52</sup> As a matter of law, Pub. Util. Code Sections 451 and 2101, and Resolution M-4846 (November 5, 2020, at 5-9) make clear that while the Commission may delegate certain tasks to its own staff, it cannot delegate powers conferred upon the Commission which involve the exercise of judgment or discretion in

particularly given the nearly \$4 billion revenue requirement request.<sup>53</sup> The last alternative, traveling back and forth to use the model at SoCalGas' facility (location unspecified) would cause further delay to Cal Advocates' review and require adjustments to the schedule.

#### **IV. REQUEST FOR RULING COMPELLING PRODUCTION**

The responses to DR 9 question 2a and DR 22 questions 1a and 1b remain incomplete. Cal Advocates requires both the data and documentation described in Section II A. above in order to verify and evaluate the reasonableness of costs associated with the AMIR Project. This unduly delays and unreasonably impedes Cal Advocates' review of the Application.<sup>54</sup> Therefore, Cal Advocates requests a ruling requiring SoCalGas to respond to Cal Advocates' March 6, 2026, and April 6, 2026, data requests and provide both a working copy of the model used to calculate the total revenue requirement in Excel and all calculations and formulas in the model. Alternatively, SoCalGas could provide documentation of the model's functioning along with access to a modified working model. Either option would allow Cal Advocates to fulfill its statutory duty to conduct a reasonable review.<sup>55</sup> If SoCalGas is unwilling or unable to comply with such an order, it should either create a new model, modify the model in such a way as to comply with its statutory obligations and the Commission rules, or withdraw all testimony that relies on the model.

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the absence of statutory authorization. See Pub. Util. Code Sections 451, 2101. See also Resolution M-4846, November 5, 2020, at 5-9 (the Commission may delegate certain tasks to its own staff, but it cannot delegate powers conferred upon the Commission which involve the exercise of judgment or discretion in the absence of statutory authorization), citing *Bagley v. City of Manhattan Beach* (1976) 18 Cal.3d 22, 24; *California School Employees Association v. Personnel Commission* (1970) 3 Cal.3d 139, 144; *Schechter v. County of Los Angeles* (1968) 258 Cal.App.2d 391, 396.

<sup>53</sup> *California Clean Energy Committee v. City of San Jose* 220 Cal.App.4th 1325 (2013).

<sup>54</sup> See Appendix 2, SCG Response to DR 9 at Response 2a; Appendix 4, SCG Response to DR22 at Responses 1a and 1b. See also Appendix 8.

<sup>55</sup> Proposed Order to follow on page 11.

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May 29, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of Southern California Gas  
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Replacement Project.

Application 25-12-019

**[PROPOSED] ORDER**

Having considered the arguments of the parties, and good cause appearing,

**It is therefore ORDERED:**

1. Southern California Gas Company (SoCalGas) shall produce a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas showing in the model or alternatively, documentation of the model's functioning and access to a modified working model that would allow Cal Advocates to fulfill its statutory duty to conduct a reasonable review within five (5) days of the date of the issuance of this Ruling. SoCalGas' model shall be functional, transparent, shall comply with Public Utilities Code Section 1822.

**IT IS SO ORDERED**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Administrative Law Judge

## **APPENDIX-01**

**A2512019 Public Advocates Data Request MTN-009  
(March 06, 2026)**



Public Advocates Office  
California Public Utilities Commission

505 Van Ness Avenue  
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

**DATA REQUEST**  
**Southern California Gas Company**  
**Advanced Meter Infrastructure Replacement (AMIR)**  
**A.25-12-019**

**Origination Date:** March 6, 2026

**Responses Due:** March 20, 2026

**To:** Greg Healy, SCG Case Manager  
[GHealy@socalgas.com](mailto:GHealy@socalgas.com)

Setareh Mortazavi, Senior Counsel  
[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

**From:** Charlotte Chitadje, Project Coordinator  
[Charlotte.chitadje@cpuc.ca.gov](mailto:Charlotte.chitadje@cpuc.ca.gov)

**Public Advocates Office**  
505 Van Ness Avenue  
San Francisco, CA 94102

**Originated by:** Sky Berry-Weiss  
**Email:** [Sky.Berry-Weiss@cpuc.ca.gov](mailto:Sky.Berry-Weiss@cpuc.ca.gov)

**Data Request No:** PubAdv-SCG-009-SBD

**Exhibit Reference:** Chapter V (Regulatory Accounting, Cost Recovery, Revenue Requirement, And Rates)

**SCG Witness:** Payal A. Gadani, Sakif Wasif, and Julia L. Cortez  
**Subject:** Forecasted Total Costs and Revenue Requirement

**Please provide the following:**

1. Referring to SCG's testimony titled "CHAPTER V – REGULATORY ACCOUNTING, COST RECOVERY, REVENUE", please answer the following:
  - a. Provide "Table V-1: Total Forecasted Direct Costs" on page 2, in an Excel spreadsheet with active cells, sources, formulae, and links.

- b. Provide “Table V-2: Total Costs Loaded and Escalated” on page 3, in an Excel spreadsheet with active cells, sources, formulae, and links. For each year, provide a line-item breakdown of the specific components used to calculate the final loaded and escalated cost, including direct costs, overhead allocations, escalation factors, AFUDC, capitalized property tax, and all other inputs used to derive the final values.
  - c. Referring to “Table V-4: Forecasted Revenue Requirement Summary” on page 5, provide an expanded table of annual revenue requirement for each year including 2036 to 2071. Each year from 2026 to 2071 should include the forecasted revenue requirement cost in millions.
2. Referring to SCG’s testimony titled, “CHAPTER V – REGULATORY ACCOUNTING, COST RECOVERY, REVENUE”, on page 3, SCG writes, “The forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071.” Please answer the following:
  - a. Provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact.
  - b. Regarding the selection of 2071 as the end date for the revenue requirement, please explain in detail why SCG chose this date and provide the underlying basis for this date and all supporting documentation used to select 2071. In the response provide all assumptions and logic used by SCG to arrive at end-of-life year 2071.
  - c. Provide all supporting documentation regarding used and useful life of existing and proposed AMIR infrastructure. In your response, explain and show how the proposed AMIR infrastructure will be used and useful until end of 2071 and why the existing infrastructure cannot be used and useful beyond 2026.
3. Did SCG extract all expected benefits from the current AMI system as outlined in Decision 10-04-027? If yes, did ratepayers receive these benefits? If not, explain why.

**END OF REQUEST**

---

**INSTRUCTIONS**

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

## **APPENDIX-02**

**A2512019 SoCalGas Response To Cal Advocates  
Data Request MTN-009  
(March 20, 2026)**

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Submitted: March 19, 2026**

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These Responses are based upon the best available non-privileged responsive information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request. SoCalGas reserves the right to supplement, amend, or correct the Responses. The Responses are provided solely in connection with California Public Utilities Commission (CPUC) proceeding A.25-12-019. SoCalGas objects to the instructions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

**QUESTION 1:**

Referring to SCG’s testimony titled “CHAPTER V – REGULATORY ACCOUNTING, COST RECOVERY, REVENUE”, please answer the following:

- a. Provide “Table V-1: Total Forecasted Direct Costs” on page 2, in an Excel spreadsheet with active cells, sources, formulae, and links.
- b. Provide “Table V-2: Total Costs Loaded and Escalated” on page 3, in an Excel spreadsheet with active cells, sources, formulae, and links. For each year, provide a line-item breakdown of the specific components used to calculate the final loaded and escalated cost, including direct costs, overhead allocations, escalation factors, AFUDC, capitalized property tax, and all other inputs used to derive the final values.
- c. Referring to “Table V-4: Forecasted Revenue Requirement Summary” on page 5, provide an expanded table of annual revenue requirement for each year including 2036 to 2071. Each year from 2026 to 2071 should include the forecasted revenue requirement cost in millions.

**RESPONSE 1:**

- a. Please see CalPA\_DR009\_1\_Attach\_A.xlsm.
- b. See Response 1.a.
- c. See Response 1.a.

**QUESTION 2:**

Referring to SCG’s testimony titled, “CHAPTER V – REGULATORY ACCOUNTING, COST RECOVERY, REVENUE”, on page 3, SCG writes, “The forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071.” Please answer the following:

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Submitted: March 19, 2026**

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- a. Provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact.
- b. Regarding the selection of 2071 as the end date for the revenue requirement, please explain in detail why SCG chose this date and provide the underlying basis for this date and all supporting documentation used to select 2071. In the response provide all assumptions and logic used by SCG to arrive at end-of-life year 2071.
- c. Provide all supporting documentation regarding used and useful life of existing and proposed AMIR infrastructure. In your response, explain and show how the proposed AMIR infrastructure will be used and useful until end of 2071 and why the existing infrastructure cannot be used and useful beyond 2026.

**RESPONSE 2:**

- a. SoCalGas does not provide its revenue requirement model to external parties due to the model's complexity and its dependence on external files located within SoCalGas's internal network, which are essential for its proper functionality. In lieu of the model, SoCalGas is providing detailed workpapers that delineate the individual components comprising the annual revenue requirement amounts. Please see CalPA\_DR009\_2\_Attach\_A.xlsm.
- b. SoCalGas objects to this request as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Revenue requirement for an asset is recovered over its authorized useful life. In this case, the AMIR Project's revenue requirement extends to 2071 because certain assets, specifically the Poles, placed into service in 2030 are classified under FERC Account 397 – Communication Equipment and have a 40-year useful life as approved in SoCalGas's most recent GRC. Under regulatory ratemaking, depreciation and the associated return must be recovered over the full duration of that authorized useful life.

- c. SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request on the grounds that it assumes facts that do not exist. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The existing AMI system and the proposed AMIR system are each composed of multiple asset categories, each with its own authorized useful life. Consequently, there is no single "useful life" for either the existing AMI or the proposed AMIR system. As authorized in SoCalGas's most recent GRC, each asset category is depreciated according to its assigned life, as shown below.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Submitted: March 19, 2026**

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<b>Asset Category (FERC Account)</b>	<b>Useful Life Years</b>
G-381 Gas Modules	20
G-381 Gas Meters	25
G-382 Module Installation	20
G-382 Meter Installation	30
G-391 Software Programs	3, 5, or 10
G-397 Communication Equipment	15
G-397 Poles	40

These component-level useful lives determine the period over which the revenue requirement is recovered.

The AMIR Network generally consists of both Communications Equipment and Poles. Because 2031 is the last year in which the Network will be installed, the revenue requirement associated with Communication Equipment will be recovered through 2046 and the revenue requirement associated with poles is recovered through 2071. Thus, AMIR revenue requirement is recovered through the individual asset service lives, and the final in-service date for poles of 2031 extends the final revenue requirement year for the longest-lived asset category to 2071.

SoCalGas has not stated that the existing AMI/AMIR infrastructure “cannot be used and useful beyond 2026.” Existing AMI infrastructure must remain in service and operational through at least 2030, when the replacement cycle for modules reaches full operational replacement capability. Indeed, the existing AMI system will continue to operate in a diminished but functional capacity until the last legacy module is replaced, projected to be 2034.

As detailed in the Chapter II Direct Testimony of David M. Mercer, the AMIR Project represents the most cost-effective module-replacement and infrastructure-refresh strategy as informed by the Exponent Failure Analysis.

**QUESTION 3:**

Did SCG extract all expected benefits from the current AMI system as outlined in Decision 10- 04-027? If yes, did ratepayers receive these benefits? If not, explain why.

**RESPONSE 3:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term “extract.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request as seeking whether the projected benefits for AMI 1.0 were realized.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Submitted: March 19, 2026**

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Yes. Ratepayers received the benefits from SoCalGas's Advanced Meter Project authorized in D.10-04-017 through the Advanced Meter Infrastructure Balancing Account (AMIBA).

## **APPENDIX-03**

**A2512019 Public Advocates Data Request MTN-022  
(April 06, 2026)**

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #22 OF CAL ADVOCATES)**

**Date Requested: April 6, 2026**

**Submitted: April 20, 2026**

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These Responses are based upon the best available non-privileged responsive information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request. SoCalGas reserves the right to supplement, amend, or correct the Responses. The Responses are provided solely in connection with California Public Utilities Commission (CPUC) proceeding A.25-12-019. SoCalGas objects to the instructions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

**QUESTION 1:**

In Cal Advocates data request, PubAdv-SCG-009-SBD, question 2a, Cal Advocates requested, "[p]rovide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact." SoCalGas responded with, "SoCalGas does not provide its revenue requirement model to external parties due to the model's complexity and its dependence on external files located within SoCalGas's internal network, which are essential for its proper functionality. In lieu of the model, SoCalGas is providing detailed workpapers that delineate the individual components comprising the annual revenue requirement amounts. Please see CalPA\_DR009\_2\_Attach\_A.xlsm."

- a. Please explain why SoCalGas considers Cal Advocates an external party that should not be provided SoCalGas' revenue requirement model due to the model's complexity and its dependence on external files located within SoCalGas's internal network.
- b. Please provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact and accessible. This is needed for Cal Advocates' analysis.

**RESPONSE 1:**

- a. SoCalGas objects to this request as argumentative. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

For purposes of this response, an external party is any entity, organization, or agency that is not part of SoCalGas and that does not operate within SoCalGas's internal network or system environment. SoCalGas is unable to provide the fully functional Excel model in its current state as requested because the model relies on internal data sources and embedded macros that are configured to function exclusively within SoCalGas's internal network environment. These components are integral to the model's functionality.

- b. SoCalGas objects to this request as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 1a.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #22 OF CAL ADVOCATES)**

**Date Requested: April 6, 2026**

**Submitted: April 20, 2026**

**QUESTION 2:**

SoCalGas is requesting total revenue requirement of \$3.76 billion. Please provide the total cost associated with expenses and capital, which translate to the \$3.76 billion in revenue requirement by completing the missing information in the table below:

<b>SoCalGas' Requested Revenue Requirement of \$3.76 Billion</b>		
<b>Items</b>	<b>Total Costs</b>	<b>Corresponding Revenue Requirement</b>
Expenses		
Capital		
<b>Grand Total</b>		<b>\$3.76 Billion</b>

**RESPONSE 2:**

See the table below.

<b>SoCalGas' Requested Revenue Requirement of \$3.76 Billion</b>		
<b>Items</b>	<b>Total Costs</b>	<b>Corresponding Revenue Requirement</b>
Expenses	\$0.42 Billion	\$0.43 Billion
Capital	\$1.65 Billion	\$3.33 Billion
<b>Grand Total</b>	<b>\$2.07 Billion</b>	<b>\$3.76 Billion</b>

## **APPENDIX-04**

**A2512019 SoCalGas Response To Cal Advocates  
Data Request MTN-022  
(April 20, 2026)**

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #22 OF CAL ADVOCATES)**

**Date Requested: April 6, 2026**

**Submitted: April 20, 2026**

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These Responses are based upon the best available non-privileged responsive information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request. SoCalGas reserves the right to supplement, amend, or correct the Responses. The Responses are provided solely in connection with California Public Utilities Commission (CPUC) proceeding A.25-12-019. SoCalGas objects to the instructions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

**QUESTION 1:**

In Cal Advocates data request, PubAdv-SCG-009-SBD, question 2a, Cal Advocates requested, "[p]rovide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact." SoCalGas responded with, "SoCalGas does not provide its revenue requirement model to external parties due to the model's complexity and its dependence on external files located within SoCalGas's internal network, which are essential for its proper functionality. In lieu of the model, SoCalGas is providing detailed workpapers that delineate the individual components comprising the annual revenue requirement amounts. Please see CalPA\_DR009\_2\_Attach\_A.xlsm."

- a. Please explain why SoCalGas considers Cal Advocates an external party that should not be provided SoCalGas' revenue requirement model due to the model's complexity and its dependence on external files located within SoCalGas's internal network.
- b. Please provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact and accessible. This is needed for Cal Advocates' analysis.

**RESPONSE 1:**

- a. SoCalGas objects to this request as argumentative. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

For purposes of this response, an external party is any entity, organization, or agency that is not part of SoCalGas and that does not operate within SoCalGas's internal network or system environment. SoCalGas is unable to provide the fully functional Excel model in its current state as requested because the model relies on internal data sources and embedded macros that are configured to function exclusively within SoCalGas's internal network environment. These components are integral to the model's functionality.

- b. SoCalGas objects to this request as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 1a.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #22 OF CAL ADVOCATES)**

**Date Requested: April 6, 2026**

**Submitted: April 20, 2026**

**QUESTION 2:**

SoCalGas is requesting total revenue requirement of \$3.76 billion. Please provide the total cost associated with expenses and capital, which translate to the \$3.76 billion in revenue requirement by completing the missing information in the table below:

<b>SoCalGas' Requested Revenue Requirement of \$3.76 Billion</b>		
<b>Items</b>	<b>Total Costs</b>	<b>Corresponding Revenue Requirement</b>
Expenses		
Capital		
<b>Grand Total</b>		<b>\$3.76 Billion</b>

**RESPONSE 2:**

See the table below.

<b>SoCalGas' Requested Revenue Requirement of \$3.76 Billion</b>		
<b>Items</b>	<b>Total Costs</b>	<b>Corresponding Revenue Requirement</b>
Expenses	\$0.42 Billion	\$0.43 Billion
Capital	\$1.65 Billion	\$3.33 Billion
<b>Grand Total</b>	<b>\$2.07 Billion</b>	<b>\$3.76 Billion</b>

## **Appendix 05**

**Meet and confer request, email sent by Cal Advocates  
(April 21, 2026)**

**From:** [Mandelbaum, Caryn L.](#)  
**To:** [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com); [GHealy@socalgas.com](mailto:GHealy@socalgas.com)  
**Cc:** [Chitadje, Charlotte](#)  
**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request  
**Date:** Tuesday, April 21, 2026 4:58:00 PM

---

Hello, Setareh-

Cal Advocates would like to discuss responses to DR 22 Questions 1a and 1b. You'll note that Question 1 seeking a working copy of SoCalGas's RO model reiterates the request from DR 9 "PubAdv-SCG-009-SBD, Question 2a," sent on March 6, 2026.

Pursuant to Rule 11.3, Cal Advocates has extended four different windows to meet and confer this week. If none of these times work for you, please provide three-four alternative dates and times when a meet and confer will work for you **this week**. If SoCalGas is not able to meet this week, Cal Advocates will consider your response to DR 22 Question 1a and 1b as meeting the standard for Rule 11.3.

Thank you,

Caryn Mandelbaum

---

**From:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>  
**Sent:** Tuesday, April 21, 2026 3:46 PM  
**To:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Caryn,

Thank you for your email. We are unfortunately unavailable during the proposed times. Please provide alternative dates and times for the week of April 27. Additionally, please identify the specific questions you wish to address.

Best,

[Setareh Mortazavi](#)

*Senior Counsel*

**Southern California Gas Company | Law Department**

555 West 5th Street, GT14G1 | Los Angeles, CA 90013

Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412

E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

---

**From:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>

**Sent:** Tuesday, April 21, 2026 12:55 PM

**To:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>

**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>

**Subject:** [EXTERNAL] A.25-12-019 Meet & Confer Request

Good day, Counsel-

Pursuant to Rules 10.1 and 11.3, Cal Advocates requests a meet and confer to discuss So Cal Gas's responses to DR 22 on **Monday, April 20** during one of the following windows:

4/22- 9-9:30am

4/22- 3-3:30pm

4/22- 4-4:30pm

4/23- 9:30-10am

Thank you,

**Caryn Mandelbaum**(she/her) | Staff Counsel | 213-620-6456 | California Public Utilities Commission

## **Appendix 06**

**Email memorializing the 4/24 Meet & Confer,  
sent by Cal Advocates  
(April 24, 2026)**

**From:** [Mandelbaum, Caryn L.](#)  
**To:** ["Mortazavi, Setareh"; "Healy, Gregory"](#)  
**Cc:** [Chitadje, Charlotte](#)  
**Subject:** Next steps from Meet & Confer RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request  
**Date:** Friday, April 24, 2026 4:21:00 PM

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Dear Counsel,

Thank you for the meet and confer today to discuss SoCalGas' responses to data requests (DR) 9 question 2a from and DR 22 questions 1a & 1b, requesting a working copy of SoCalGas' revenue requirement model.

To confirm next steps:

By Tuesday, **April 24, 2026**, SoCalGas will provide a written progress report to Cal Advocates via email explaining:

- Details of what makes the PET model so distinct from RO models that it cannot be provided in a working format to the Public Advocates Office (Cal Advocates) in the way SoCalGas regularly provides RO models to the Commission in other proceedings.
- Details about steps SoCalGas' modeling team is taking to provide a working copy of the PET model to Cal Advocates no later than May 1, 2026, at noon.
- Details about SoCalGas' alternative proposals-- including Excel workbooks with formatted formula and macros, walk-through, small scale models-- for delivering the equivalent of a working copy of the revenue requirement model to Cal Advocates no later than May 1, 2026, at noon.

By Friday, **May 1, 2026, at 12 noon\***, SoCalGas will provide either of the following deliverables to Cal Advocates by email:

- A working copy of SoCalGas' revenue requirement model as requested in DR 9 and DR 22.
- A supplemental response to SoCalGas' answers to DR 9 question 2a and DR 22 questions 1a & 1b.
- 

\*Though the timing of delivery was not discussed at the meet and confer, the delivery date and urgency of these materials were discussed for Cal Advocates to conduct its statutory obligations in review of your application. Cal Advocates requires SoCalGas' final responses by 12 noon on May 1, 2026 to allow it time to immediately review the responses and formulate questions.

Please promptly confirm your understanding of our discussion today and next steps.

Sincerely,  
Caryn Mandelbaum  
Attorney for the Public Advocates Office

**Caryn Mandelbaum**(she/her) | Staff Counsel | 213-620-6456 | California Public Utilities Commission

---

**From:** Mandelbaum, Caryn L.  
**Sent:** Wednesday, April 22, 2026 7:19 AM  
**To:** Mortazavi, Setareh <SMortazavi@socalgas.com>; Healy, Gregory <GHealy@socalgas.com>  
**Cc:** Chitadje, Charlotte <charlotte.chitadje@cpuc.ca.gov>

**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

We are available to meet and confer from 1-130p on Friday 4/24. I will send a calendar invite.

Thank you,  
Caryn

---

**From:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>

**Sent:** Tuesday, April 21, 2026 5:16 PM

**To:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>

**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>

**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Caryn,

We are available to meet and confer on Friday, April 24 at the following times:

- 1:00-1:30 p.m.
- 2:00-2:30 p.m.
- 3:00-3:30 p.m.
- 3:30-4:00 p.m.

Please confirm which time works for Cal Advocates.

We note that Cal Advocates provided four 30-minute windows over the next two days, which is not a reasonable timeframe to schedule a meet and confer. Further, treating our response to DR 22 Questions 1a and 1b as satisfying Rule 11.3 would not constitute a good faith meet and confer under the rule.

Best,

**Setareh Mortazavi**

*Senior Counsel*

**Southern California Gas Company | Law Department**

555 West 5th Street, GT14G1 | Los Angeles, CA 90013

Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412

E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

---

**From:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>

**Sent:** Tuesday, April 21, 2026 4:59 PM

**To:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

Hello, Setareh-

Cal Advocates would like to discuss responses to DR 22 Questions 1a and 1b. You'll note that Question 1 seeking a working copy of SoCalGas's RO model reiterates the request from DR 9 "PubAdv-SCG-009-SBD, Question 2a," sent on March 6, 2026.

Pursuant to Rule 11.3, Cal Advocates has extended four different windows to meet and confer this week. If none of these times work for you, please provide three-four alternative dates and times when a meet and confer will work for you **this week**. If SoCalGas is not able to meet this week, Cal Advocates will consider your response to DR 22 Question 1a and 1b as meeting the standard for Rule 11.3.

Thank you,

Caryn Mandelbaum

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**From:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>  
**Sent:** Tuesday, April 21, 2026 3:46 PM  
**To:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

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Hi Caryn,

Thank you for your email. We are unfortunately unavailable during the proposed times. Please provide alternative dates and times for the week of April 27. Additionally, please identify the specific questions you wish to address.

Best,

Setareh Mortazavi  
*Senior Counsel*

**Southern California Gas Company | Law Department**  
555 West 5th Street, GT14G1 | Los Angeles, CA 90013  
Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412  
E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

---

**From:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>  
**Sent:** Tuesday, April 21, 2026 12:55 PM  
**To:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** [EXTERNAL] A.25-12-019 Meet & Confer Request

Good day, Counsel-

Pursuant to Rules 10.1 and 11.3, Cal Advocates requests a meet and confer to discuss So Cal Gas's responses to DR 22 on **Monday, April 20** during one of the following windows:

4/22- 9-9:30am  
4/22- 3-3:30pm  
4/22- 4-4:30pm  
4/23- 9:30-10am

Thank you,

**Caryn Mandelbaum**(she/her) | Staff Counsel | 213-620-6456 | California Public Utilities Commission

## **Appendix 07**

**Progress Report email, sent by SoCalGas  
(April 28, 2026)**

**From:** [Mortazavi, Setareh](#)  
**To:** [Mandelbaum, Caryn L.](#); [Healy, Gregory](#)  
**Cc:** [Chitadje, Charlotte](#)  
**Subject:** RE: Next steps from Meet & Confer RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request  
**Date:** Tuesday, April 28, 2026 4:55:28 PM

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Caryn,

Thank you for your email.

As an initial matter, SoCalGas clarifies that the meet and confer on Friday, April 24, 2026, was held to discuss Cal Advocates' data requests in DR 22, Questions 1a and 1b. SoCalGas acknowledges that Cal Advocates referenced DR 9, Question 2a during the discussion, noting that DR 22, Questions 1a and 1b were intended as a follow-up to that earlier request.

SoCalGas provides the following update regarding its efforts to provide a supplemental response to Cal Advocates' requests:

- The RO model is a stand-alone model in which all functionality is contained within a series of Excel files and an Access Database with a VBA overlay. The RO model was created with the understanding that it could be utilized externally, and it includes a user guide to walk a new user through the model's functionality and the proper way to input data, with clearly defined data input fields. By contrast, the PET model was built for internal use and the model's VBA code links to internal files. In addition, there is no user guide to walk a user through the model's functionality or process.
- SoCalGas's modeling team is currently testing the PET model to determine if it can modify the model while maintaining functionality.
- If SoCalGas is unable to provide a functional model, SoCalGas proposes the following alternatives to support Cal Advocates' review: (1) a comprehensive walkthrough of the PET model; and/or (2) running scenarios on behalf of Cal Advocates, including running live scenarios. SoCalGas also notes that it previously provided detailed workpapers in response to DR 9, Question 2a, which delineate the individual components comprising the annual revenue requirement amounts.

As you note, the timing of delivery was not discussed during the meet and confer. SoCalGas will endeavor to provide its response by noon on Friday, May 1, 2026, but in any event will provide its response no later than that date.

SoCalGas looks forward to continuing to work cooperatively with Cal Advocates on these matters.

Best regards,

Setareh Mortazavi

*Senior Counsel*

**Southern California Gas Company | Law Department**

555 West 5th Street, GT14G1 | Los Angeles, CA 90013

Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412

E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

---

**From:** Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>

**Sent:** Friday, April 24, 2026 4:21 PM

**To:** Mortazavi, Setareh <SMortazavi@socalgas.com>; Healy, Gregory <GHealy@socalgas.com>

**Cc:** Chitadje, Charlotte <charlotte.chitadje@cpuc.ca.gov>

**Subject:** Next steps from Meet & Confer RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

Dear Counsel,

Thank you for the meet and confer today to discuss SoCalGas' responses to data requests (DR) 9 question 2a from and DR 22 questions 1a & 1b, requesting a working copy of SoCalGas' revenue requirement model.

To confirm next steps:

By Tuesday, **April 24, 2026**, SoCalGas will provide a written progress report to Cal Advocates via email explaining:

- Details of what makes the PET model so distinct from RO models that it cannot be provided in a working format to the Public Advocates Office (Cal Advocates) in the way SoCalGas regularly provides RO models to the Commission in other proceedings.
- Details about steps SoCalGas' modeling team is taking to provide a working copy of the PET model to Cal Advocates no later than May 1, 2026, at noon.
- Details about SoCalGas' alternative proposals-- including Excel workbooks with formatted formula and macros, walk-through, small scale models-- for delivering the equivalent of a working copy of the revenue requirement model to Cal Advocates no later than May 1, 2026, at noon.

By Friday, **May 1, 2026, at 12 noon**\*, SoCalGas will provide either of the following deliverables to Cal Advocates by email:

- A working copy of SoCalGas' revenue requirement model as requested in DR 9 and DR 22.
- A supplemental response to SoCalGas' answers to DR 9 question 2a and DR 22 questions 1a & 1b.
- 

\*Though the timing of delivery was not discussed at the meet and confer, the delivery date and urgency of these materials were discussed for Cal Advocates to conduct its statutory obligations in review of your application. Cal Advocates requires SoCalGas' final responses by 12 noon on May 1, 2026 to allow it time to immediately review the responses and formulate questions.

Please promptly confirm your understanding of our discussion today and next steps.

Sincerely,

Caryn Mandelbaum

Attorney for the Public Advocates Office

**Caryn Mandelbaum**(she/her) | Staff Counsel | 213-620-6456 | California Public Utilities Commission

---

**From:** Mandelbaum, Caryn L.  
**Sent:** Wednesday, April 22, 2026 7:19 AM  
**To:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

We are available to meet and confer from 1-130p on Friday 4/24. I will send a calendar invite.

Thank you,  
Caryn

---

**From:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>  
**Sent:** Tuesday, April 21, 2026 5:16 PM  
**To:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>  
**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

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Please confirm which time works for Cal Advocates.

We note that Cal Advocates provided four 30-minute windows over the next two days, which is not a reasonable timeframe to schedule a meet and confer. Further, treating our response to DR 22 Questions 1a and 1b as satisfying Rule 11.3 would not constitute a good faith meet and confer under the rule.

Best,

Setareh Mortazavi

*Senior Counsel*

**Southern California Gas Company | Law Department**

555 West 5th Street, GT14G1 | Los Angeles, CA 90013

Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412

E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

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**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>

**Subject:** RE: [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

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Pursuant to Rule 11.3, Cal Advocates has extended four different windows to meet and confer this week. If none of these times work for you, please provide three-four alternative dates and times when a meet and confer will work for you **this week**. If SoCalGas is not able to meet this week, Cal Advocates will consider your response to DR 22 Question 1a and 1b as meeting the standard for Rule 11.3.

Thank you,

Caryn Mandelbaum

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**Sent:** Tuesday, April 21, 2026 3:46 PM

**To:** Mandelbaum, Caryn L. <[Caryn.Mandelbaum@cpuc.ca.gov](mailto:Caryn.Mandelbaum@cpuc.ca.gov)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>

**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>

**Subject:** [EXTERNAL] RE: A.25-12-019 Meet & Confer Request

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Hi Caryn,

Thank you for your email. We are unfortunately unavailable during the proposed times. Please provide alternative dates and times for the week of April 27. Additionally, please identify the specific questions you wish to address.

Best,

**Setareh Mortazavi**

*Senior Counsel*

**Southern California Gas Company | Law Department**

555 West 5th Street, GT14G1 | Los Angeles, CA 90013

Tel: 213.244.2975 | Fax: 213.629.9620 | Cell: 323.633.1412

E-mail: [SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)

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**Sent:** Tuesday, April 21, 2026 12:55 PM

**To:** Mortazavi, Setareh <[SMortazavi@socalgas.com](mailto:SMortazavi@socalgas.com)>; Healy, Gregory <[GHealy@socalgas.com](mailto:GHealy@socalgas.com)>

**Cc:** Chitadje, Charlotte <[charlotte.chitadje@cpuc.ca.gov](mailto:charlotte.chitadje@cpuc.ca.gov)>

**Subject:** [EXTERNAL] A.25-12-019 Meet & Confer Request

Good day, Counsel-

Pursuant to Rules 10.1 and 11.3, Cal Advocates requests a meet and confer to discuss So Cal Gas's responses to DR 22 on **Monday, April 20** during one of the following windows:

4/22- 9-9:30am

4/22- 3-3:30pm

4/22- 4-4:30pm

4/23- 9:30-10am

Thank you,

**Caryn Mandelbaum**(she/her) | Staff Counsel | 213-620-6456 | California Public Utilities Commission

## **Appendix 08**

**SoCalGas Supplemental Response to PAO DR 9,  
(May 01, 2026)**

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)  
Date Requested: March 6, 2026  
Supplemental Response Submitted: May 1, 2026**

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These Responses are based upon the best available non-privileged responsive information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request. SoCalGas reserves the right to supplement, amend, or correct the Responses. The Responses are provided solely in connection with California Public Utilities Commission (CPUC) proceeding A.25-12-019. SoCalGas objects to the instructions submitted by Cal Advocates on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

**QUESTION 2:**

Referring to SCG’s testimony titled, “CHAPTER V – REGULATORY ACCOUNTING, COST RECOVERY, REVENUE”, on page 3, SCG writes, “The forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071.” Please answer the following:

- a. Provide a working copy of the model used to calculate the total revenue requirement in Excel with all calculations and formulas intact.
- b. Regarding the selection of 2071 as the end date for the revenue requirement, please explain in detail why SCG chose this date and provide the underlying basis for this date and all supporting documentation used to select 2071. In the response provide all assumptions and logic used by SCG to arrive at end-of-life year 2071.
- c. Provide all supporting documentation regarding used and useful life of existing and proposed AMIR infrastructure. In your response, explain and show how the proposed AMIR infrastructure will be used and useful until end of 2071 and why the existing infrastructure cannot be used and useful beyond 2026.

**RESPONSE 2:**

- a. SoCalGas does not provide its revenue requirement model to external parties due to the model’s complexity and its dependence on external files located within SoCalGas’s internal network, which are essential for its proper functionality. In lieu of the model, SoCalGas is providing detailed workpapers that delineate the individual components comprising the annual revenue requirement amounts. Please see CalPA\_DR009\_2\_Attach\_A.xlsm.
- b. SoCalGas objects to this request as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Revenue requirement for an asset is recovered over its authorized useful life. In this case, the AMIR Project’s revenue requirement extends to 2071 because certain assets, specifically the

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Supplemental Response Submitted: May 1, 2026**

---

Poles, placed into service in 2030 are classified under FERC Account 397 – Communication Equipment and have a 40-year useful life as approved in SoCalGas’s most recent GRC. Under regulatory ratemaking, depreciation and the associated return must be recovered over the full duration of that authorized useful life.

- c. SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request on the grounds that it assumes facts that do not exist. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The existing AMI system and the proposed AMIR system are each composed of multiple asset categories, each with its own authorized useful life. Consequently, there is no single “useful life” for either the existing AMI or the proposed AMIR system. As authorized in SoCalGas’s most recent GRC, each asset category is depreciated according to its assigned life, as shown below.

<b>Asset Category (FERC Account)</b>	<b>Useful Life Years</b>
G-381 Gas Modules	20
G-381 Gas Meters	25
G-382 Module Installation	20
G-382 Meter Installation	30
G-391 Software Programs	3, 5, or 10
G-397 Communication Equipment	15
G-397 Poles	40

These component-level useful lives determine the period over which the revenue requirement is recovered.

The AMIR Network generally consists of both Communications Equipment and Poles. Because 2031 is the last year in which the Network will be installed, the revenue requirement associated with Communication Equipment will be recovered through 2046 and the revenue requirement associated with poles is recovered through 2071. Thus, AMIR revenue requirement is recovered through the individual asset service lives, and the final in-service date for poles of 2031 extends the final revenue requirement year for the longest-lived asset category to 2071.

SoCalGas has not stated that the existing AMI/AMIR infrastructure “cannot be used and useful beyond 2026.” Existing AMI infrastructure must remain in service and operational through at least 2030, when the replacement cycle for modules reaches full operational replacement capability. Indeed, the existing AMI system will continue to operate in a diminished but functional capacity until the last legacy module is replaced, projected to be 2034.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORIZATION TO  
IMPLEMENT REVENUE REQUIREMENT FOR ADVANCED METER INFRASTRUCTURE  
REPLACEMENT PROJECT  
(A.25-12-019)**

**(DATA REQUEST #9 OF CAL ADVOCATES)**

**Date Requested: March 6, 2026**

**Supplemental Response Submitted: May 1, 2026**

---

As detailed in the Chapter II Direct Testimony of David M. Mercer, the AMIR Project represents the most cost-effective module-replacement and infrastructure-refresh strategy as informed by the Exponent Failure Analysis.

**SUPPLEMENTAL RESPONSE 2a:**

SoCalGas has confirmed that it is not able to provide Cal Advocates with a functioning model that would produce results consistent with the Application outside of SoCalGas's network. Because the model is dependent on internal file and table linkages and infrastructure, extracting it from that environment would compromise its functionality and not allow for appropriate validation of outputs it generates.

Pursuant to California Public Utilities Commission Rules of Practice and Procedure 10.4, SoCalGas can make the following alternatives available to Cal Advocates:

1. SoCalGas can make the model available onsite at a SoCalGas facility for Cal Advocates to access and run the model directly on SoCalGas's system.
2. SoCalGas can provide a comprehensive walkthrough of the model to Cal Advocates.
3. SoCalGas can run scenarios on behalf of Cal Advocates, including running live scenarios, based on inputs or assumptions specified by Cal Advocates.