

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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

Application 25-12-019

**MOTION OF THE PUBLIC ADVOCATES OFFICE
TO STRIKE ALL TESTIMONY BASED ON
SOUTHERN CALIFORNIA GAS COMPANY'S COMPUTER MODEL**

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) moves to strike all of Southern California Gas Company's (SoCalGas) testimony¹ based on its computer model that calculates the proposed revenue requirement for its *Application for Authorization to Implement Revenue Requirement for Advanced Meter Infrastructure Replacement Project* (Application).² Rather than use the model typically used to support such requests, by its own admission, SoCalGas created a computer model which cannot be produced and cannot be verified by intervenors or Commission staff.³ As SoCalGas is well aware, this is contrary to SoCalGas' legal obligations to produce calculations, tabulations, and computer models to external parties for verification.⁴

SoCalGas' refusal or inability to comply with its obligations under Sections 581 and 1822 and Rule 10.3 – to produce the computer model upon which it bases its testimony for verification – undermines both Cal Advocates rights and the regulatory compact. As set forth in detail below, beyond unreasonably impeding Cal Advocates' review of the Application, allowing SoCalGas to present testimony based on an unproduced and unverified computer model would violate Cal Advocates' due process rights,⁵ and improperly delegate the Commission's duty to ensure just and reasonable rates to SoCalGas.⁶ In order to remedy the defects caused by SoCalGas' unilateral

¹ Section II.B, below, identifies testimony that relies on SoCalGas' unverified and unproduced computer model.

² Application (A.) 25-12-019, *Application for Authorization to Implement Revenue Requirement for Advanced Meter Infrastructure Replacement Project by Southern California Gas Company*, December 30, 2025 (Application).

³ SoCalGas states that it is "unable to provide the fully functional Excel model" for verification to external parties. See Appendix 4, A2512019 SoCalGas Response To Cal Advocates Data Request MTN-022 (SCG Response to DR 22), April 20, 2026, at 1b.

⁴ See Public Utilities Code Sections 581 and 1822; California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rule), Rule 10.3.

⁵ See *Calaveras Tel. Co. v. Public Utilities Com.* (2019) 39 Cal.App.5th 972, 980; *S. California Edison Co. v. Pub. Utilities Com.* (2006) 140 Cal. App. 4th 1085, 1106.

⁶ Public Utilities Code Sections 451 and 2101, and Resolution M-4846 (November 5, 2020, at 5-9), citing

decision to forego the usual modelling approach in favor of its “black box” model, all testimony that is based on SoCalGas’ computer model must be stricken from the proceeding record.

If the Commission chooses to allow SoCalGas to re-create its model in an accepted model that can be produced to other parties, consistent with Sections 581 and 1822 and Rule 10.3, the Commission should still strike the current testimony and order SoCalGas amend its Application to conform to its new model and testimony. The Commission should also require SoCalGas to explain any changes to its modeling results, any changes to modeling assumptions, and any other differences between its original model and its new model. Parties should have the opportunity to submit responses or protests to SoCalGas’ amended application.

II. DISCUSSION

A. The Commission must strike all testimony that is based on SoCalGas’ unproduced and unverified computer model.

1. SoCalGas is obligated to produce its computer model, input data, and calculations pursuant to Sections 581 and 1822, and Rule 10.3.

Section 581 requires SoCalGas to provide “tabulations, computations, and all other information” in response to a request.⁷ Section 1822 requires SoCalGas, whose testimony relies on a computer model,⁸ to provide its computer model for verification

Bagley v. City of Manhattan Beach (1976) 18 Cal.3d 22, 24.

⁷ Pub. Util. 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, and shall make specific answers to all questions submitted by the commission.”)

⁸ See A.25-12-019, *Prepared Direct Testimony of Payal A. Gadani, Sakif Wasif, and Julia L. Cortez on Behalf of Southern California Gas Company (U 904 G) (CHAPTER V – Regulatory Accounting, Cost Recovery, Revenue Requirement, and Rates)* (SCG Testimony Chapter V), Dec. 30, 2025, at PG/SW/JC-3 (“The forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071.”); see also Appendix 2, SoCalGas Response to DR 9 at Response 2a (stating that its computer model is a “revenue requirement model”).

upon request by the Commission or any party to a proceeding.² Specifically, in relevant part Section 1822 states:

- (a) Any computer model that is the basis for any testimony or exhibit in a hearing or proceeding before the commission shall be available to, and subject to verification by, the commission and parties to the hearing or proceedings to the extent necessary for cross-examination or rebuttal, subject to applicable rules of evidence, . . .
- (b) Any testimony presented in a hearing or proceeding before the commission that is based in whole, or in part, on a computer model shall include a listing of all the equations and assumptions built into the model.
- (c) Any database that is used for any testimony or exhibit in a hearing or proceeding before the commission shall be reasonably accessible to the commission staff and parties, . . .

Pursuant to Section 1822(d), which directs the Commission to issue rules and procedures to meet the requirements specified in Section 1822(a)-(c), the Commission adopted Rule 10.3.¹⁰ Rule 10.3 delineates the type of documentation a party that relies on computer models must provide to any party upon request. The information that must be provided under Rule 10.3 upon request specifically includes:¹¹

- (1) A description of the source of all input data;
- (2) The complete set of input data (input file) as used in the sponsoring party's computer run(s);
- (3) Documentation sufficient for an experienced professional to understand the basic logical processes linking the input data to the output, including but not limited to a manual which includes:
 - (A) A complete list of variables (input record types), input record formats, and a description of how input files are created and data entered as used in the sponsoring party's computer model(s).

² Pub. Util. Code Section 1822.

¹⁰ See Rule 10.3, referencing Section 1822(d). See also D.21-03-052, *Application of Sw. Gas Corp. (U905g) for Auth. to Increase Rates & Charges for Nat. Gas Serv. in California*, March 25, 2021, at 14, footnote 24 (“The use of computer models in Commission proceedings is governed by Public Utilities Code §§ 1821-1822 and Rules 10.3 - 10.4 of the Commission's Rules of Practice and Procedure”).

¹¹ Rule 10.3(a).

- (B) A complete description of how the model operates and its logic. This description may make use of equations, algorithms, flow charts, or other descriptive techniques.
- (C) A description of a diagnostics and output report formats as necessary to understand the model's operation.
- (4) A complete set of output files relied on to prepare or support the testimony or exhibits; and
- (5) A description of post-processing requirements of the model output.

Here, SoCalGas' testimony relies on its computer model to support the proposed \$3.76 billion revenue requirement that SoCalGas seeks through its Application.¹² Since SoCalGas' testimony relies on its computer model, Sections 581 and 1822 and Rule 10.3, require SoCalGas to provide its computer models, input data, and calculations in response to Cal Advocates' requests.¹³

Not long after establishing the modeling guidelines, the Commission updated Rule 10.3 on Computer Model Documentation in D.06-07-006.¹⁴ While the Commission had the opportunity to modify Rule 10.3 in such a way as to eliminate, reduce or simplify the documentation required to accompany computer models, it chose not to. Instead, the Commission only clarified *when* the documentation was required.¹⁵

¹² See SCG Testimony Chapter V at PG/SW/JC-3 ("The forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071."); see also Appendix 2, SoCalGas Response to DR 9 at Response 2a ("SoCalGas does not provide its revenue requirement model to external parties . . .").

¹³ See D.12-04-051, *La Collina, Dal, Lago Lp, & Bernau Dev. Corp., Complainants*, Apr. 19, 2012, at 13, footnote 48 ("It is only required that such models be subject to verification by the Commission or parties if requested. (Pub. Util. Code, § 1822, subd. (a).)").

¹⁴ D.06-07-006 at 10-11.

¹⁵ D.06-07-006 at 10-11 (July 20, 2006) (documentation would be required *upon request* as opposed to in conjunction with the service of the prepared testimony moving forward).

2. The Commission must strike SoCalGas’ testimony due to SoCalGas’ inability to produce its computer model for verification.

a) SoCalGas has unequivocally established that it is unable or unwilling to produce its computer model.

Cal Advocates issued several DRs for information that are consistent with Section 1822.¹⁶ In particular, DRs, PubAdv-SCG-009-SBD (DR9)¹⁷ and PubAdv-SCG-022-CC3 (DR22)¹⁸ seek “a working copy of the model used to calculate the total revenue requirement in Excel, with all calculations and formulas intact.”¹⁹ In addition to seeking input data and calculations consistent with requests for computer models pursuant to Section 1822, Cal Advocates sought input data pursuant to Rule 10.3, and calculations pursuant to Section 581. Cal Advocates’ requests are also consistent with the Commission’s decades-long practice of requiring utilities to produce transparent computer models.²⁰ As noted by the Commission with regard to revenue requirement modeling in D. 00-07-050, “the single most important effort we can make to streamline” proceedings is to get the utilities, Commission staff, and parties to work together to ensure the utility’s “models are transparent ...”²¹

Here, SoCalGas blithely eschews both precedent and the rule of law. In response to DR9, SoCalGas states:

SoCalGas does not provide its revenue requirement model to external parties due to the model’s complexity and its dependence on external files

¹⁶ See, e.g., SCG Testimony Chapter V at PG/SW/JC-3.

¹⁷ Appendix 1, DR9 at Question 2. Question 2a refers to SoCalGas’ Application and Testimony, 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.

¹⁸ 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.

¹⁹ Appendix 1, DR9 at Question 2.

²⁰ D.06-07-006 at 10-11.

²¹ See D.00-07-050, Finding of Fact 4 at 184.

located within SoCalGas’s internal network, which are essential for its property functionality.²²

Similarly, in response to DR22, SoCalGas states:

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 that are configured to function exclusively within SoCalGas’s internal network environment.²³

SoCalGas reiterates its position in a supplemental response to DR9 where it claims to have “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.”²⁴ Thus, that SoCalGas claims that it cannot produce its computer model or the data inputs and embedded calculations within its model is unequivocal.

b) The Commission must strike SoCalGas’ testimony as a matter of law.

Since SoCalGas unequivocally states that it is unable or unwilling to produce its computer model, the Commission must strike all SoCalGas testimony that is based on the model from the proceeding record. As shown below, allowing testimony into the record that is based on an unverifiable and unproduced computer model, and therefore without meaningful scrutiny, would be contrary to both statute, Commission rules, and due process.²⁵ SoCalGas cannot both use the model and refuse to make its model available in

²² Appendix 2 SCG Response to DR 9 at Response.

²³ 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 that are configured to function exclusively within SoCalGas’s internal network environment. These components are integral to the model’s functionality.”).

²⁴ Appendix 8, SoCalGas Supplemental Response to PAO DR 9 (SCG Supplement to DR 9), May 01, 2026, at Supplemental Response 2a.

²⁵ *Calaveras Tel. Co. v. Public Utilities Com.* (2019) 39 Cal.App.5th 972, 980; (courts “will annul a decision by the Commission if the Commission failed to comply with its own rules and the failure was prejudicial.”); *S. California Edison Co. v. Pub. Utilities Com.* (2006) 140 Cal. App. 4th 1085, 1106 (“The PUC’s failure to comply with its own rules concerning the scope of issues to be addressed in the proceeding therefore was prejudicial”); *W. States Petroleum Ass’n v. Env’tl. Prot. Agency*, 87 F.3d 280, 284 (9th Cir. 1996) (holding that an agency “may not depart, sub silentio, from its usual rules of decision”). See also *Golden State Water Company v. Public Utilities Commission* (2024) 16 Cal.5th 380, 394-395

a functional manner to parties or the Commission. SoCalGas should be prohibited from profiting off of this double standard by striking any and all testimony or values derived from the model in its Application.

(1) Rule 10.3.

In relevant part, Rule 10.3 provides that:²⁶

Any party who sponsors testimony or exhibits which are based in whole, or in part, on a computer model **shall** provide to any party upon request, the following information:²⁷

As used here, consistent with the rules of statutory interpretation, “shall” is obligatory, not optional. Therefore, if a party’s testimony relies on a computer model, then Section 1822 and Rule 10.3 require that party to produce its computer model as well as the model’s data inputs, calculations, assumptions, and algorithms.²⁸ On its face then, SoCalGas’ refusal or inability to produce the computer model on which its testimony relies is contrary to Section 1822 and Rule 10.3. Nor, despite having been given ample opportunity to do so, has SoCalGas referenced or identified exemption to Rule 10.3 that might justify its refusal or inability to produce the computer model. Therefore, whether SoCalGas refuses to produce its computer model, or is unable to do so based on the model’s intrinsic design (as SoCalGas claims) is irrelevant.²⁹ As a matter of law, the Commission must adhere to statutes, follow its own rules, and strike SoCalGas’ testimony based on the model.³⁰

(where the Commission does not comply with the statutory requirement, it has failed to regularly pursue its authority).

²⁶ As noted above, the Commission adopted Rule 10.3 to meet the requirements specified in Section 1822(a)-(c).

²⁷ Rule 10.3 (emphasis added). As set forth in section II.A.1. and 2. above, the information requested in DR 9 and DR 22 falls squarely within the information identified in both Section 1822 and Rule 10.3.

²⁸ Public Utilities Code Section 1822(a)-(c) and Rule 10.3(a).

²⁹ Appendix 4, SCG Response to DR 22 at Response 1b.

³⁰ Public Utilities Code Section 1822(a)-(c) and Rule 10.3(a); *S. California Edison Co. v. Pub. Utilities Com.* (2006) 140 Cal. App. 4th 1085, 1106.

(2) Due process.

Allowing SoCalGas to submit testimony based on an unverifiable and unproduced computer model would violate due process, because it would deprive Cal Advocates of any meaningful opportunity to review and scrutinize SoCalGas' testimony.³¹ In addition to its discovery rights,³² Cal Advocates has statutory and regulatory rights to obtain SoCalGas' computer model and its inputs and calculations under Sections 581 and 1822 and Rule 10.3, as discussed above. Due process requires a meaningful opportunity to participate in a proceeding, and discovery of relevant material is a core part of meaningful participation.³³ Without the model, inputs, and calculations, Cal Advocates lacks the ability to meaningfully scrutinize SoCalGas' testimony based on the model. Therefore, the Commission must strike SoCalGas' testimony to uphold due process.

(3) Improper delegation of Commission's authority

Blithely trusting the computer model utilized by SoCalGas to calculate its proposed revenue requirement would be an improper delegation of Commission's authority and obligation to consider the reasonableness of SoCalGas' revenue request to SoCalGas.³⁴ The Commission has the obligation to consider just and reasonable rates and ensure that utilities obey statutory law.³⁵ The burden of proof "rests heavily" upon

³¹ See, e.g., *Armstrong v. Manzo*, 380 U.S. 545 (1965) (party must be given notice and opportunity to be heard); *People v. W. Air Lines*, 42 Cal. 2d 621, 632 (1954) (due process requires adequate notice to a party affected and an opportunity to be heard before a valid order can be made).

³² See, e.g., Public Utilities Code Sections 309.5 and 314; Rule 10.1 (authorizes parties to "obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter 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.").

³³ See D.98-03-073, *In re Joint Application of Pac. Enters.*, 79 CPUC 2d 343, 1998 WL 211974 (Cal.P.U.C.) at Conclusion of Law 6 (a party's "disregard of its discovery obligations has irreparably harmed applicants' due process rights to conduct full and fair discovery in this proceeding").

³⁴ See 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.

³⁵ Pub. Util. Code Sections 451 and 2101 ("The commission shall see that the provisions of the Constitution and statutes of this State affecting public utilities . . . are enforced and obeyed, and that

SoCalGas, as the applicant, to affirmatively establish that it is entitled to all aspects of its requests; the burden is not upon the Commission, its staff, or any interested party to prove the contrary.³⁶ Allowing SoCalGas to rely on its unproduced and unverified computer model is effectively the same as allowing SoCalGas, rather than the Commission, to make the determination that the model affirmatively establishes that SoCalGas is entitled to the relief it seeks in this proceeding. In such case, the Commission would improperly delegate its obligation to scrutinize SoCalGas' evidence and ensure just and reasonable rates to SoCalGas.³⁷

3. SoCalGas' assertion that its model relies on internal inputs is inconsistent with its statutory and regulatory obligations.

By its own admission, SoCalGas made a unilateral decision to develop and base significant testimony upon a novel computer model that relies on internal inputs and that cannot be shared or externally reproduced.³⁸ This, despite the fact that SoCalGas knew, or should have known, that it had the obligation to produce its computer model (as well as its data inputs, and calculations) pursuant to Sections 581 and 1822 and Rule 10.3. Indeed, SoCalGas' parent company (Sempra) regularly provides copies of its results of operations (RO) models with tabulations and computations, to verify proposed revenue requirements to intervenors in general rate cases.³⁹ In contrast to this practice, for this

violations thereof are promptly prosecuted . . .”).

³⁶ D.14-07-006, *Decision Approving San Diego Gas & Electric Company's 2010 Energy Resource Recovery Account Costs and Related Matters*, July 17, 2014, at 6; issued in A. 11-06-003. (The applicant “has the burden of affirmatively establishing the reasonableness of all aspects of its request and proving that it is entitled to the Commission’s actions and relief in rates that it is requesting. As with most utility related matters, the standard of proof that the applicant must meet is that of a preponderance of evidence.”); See also D.90-09-088, 37 Cal.PUC 2d 488, 1990 WL 488895, p. *9 (Sept. 25, 1990); D.92496, *In Re Energy Cost Adjustment Clauses* (1980) 4 Cal.PUC 2d 693, 1980 WL 128897 at *6 (burden of proof is on the utility applicant to establish reasonableness).

³⁷ See Pub. Util. Code Sections 451 and 2101, and Resolution M-4846 at 5-9.

³⁸ See Appendix 4, SCG Response to DR 22 at Response 1b; see also, Appendix 7, Email from SoCalGas, April 28, 2026.

³⁹ See, e.g., A.22-05-015, 2024 SoCalGas General Rate Case Application, Exhibit: SCG-39-2R *Second Revised Prepared Direct Testimony of Ryan Hom (Summary of Earnings)*, November 2022, at RH-1 (“My testimony presents the results of the Results of Operations (RO) model for SoCalGas. The RO model is

Application SoCalGas created a “PET” model that was specifically “built for internal use” and for which SoCalGas has “no user guide to walk a user through the model’s functionality or process.”⁴⁰ Though it knows that the inaccessibility of its model is contrary to standard RO modeling practice at the Commission, SoCalGas has offered no explanation for its decision to use the model, identified no advantages (efficiency, accuracy, etc.) of the model, or identified any need to change to the model. Thus, SoCalGas knowingly switched to a model which it designed in a manner that prevents it from complying with Sections 1822 and Rule 10.3.

SoCalGas’ unilateral decision to create and use this exclusively internal computer model appears intended to shield SoCalGas from Commission scrutiny.⁴¹ However, SoCalGas identifies nothing in Section 1822, Rule 10.3, or anywhere else that allows it to avoid Commission scrutiny on claims of exclusive internal use. On the contrary, SoCalGas knew or should have known that the functionality of its model would be an issue in its Application. Therefore, consistent with Section 1822 and Rule 10.3, the Commission must strike the portions of SoCalGas’ testimony that are based on the model.

4. SoCalGas’ objections are baseless.

The Commission must reject SoCalGas’ objection to Cal Advocates’ request for the computer model as “overly broad and unduly burdensome”. This objection is void as

designed to meet the requirements set forth in the California Public Utilities Commission’s (CPUC or Commission) Rate Case Plan and prior GRC decisions.”). Accessed at https://www.socalgas.com/sites/default/files/SCG-39-2R_Second_Revised_Testimony_Ryan_Hom-Summary_of_Earnings_PDFA_2612.pdf

⁴⁰ Appendix 7, Email from SoCalGas, April 28, 2026 (“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.”).

⁴¹ 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 that are configured to function exclusively within SoCalGas’s internal network environment. These components are integral to the model’s functionality.”).

a matter of law. Neither Section 1822 nor Rule 10.3 allow parties to develop and depend on models to support their request, and then avoid scrutiny of those models on claims that sharing the model is unduly burdensome.⁴² Simply put, it cannot reasonably be deemed “unduly burdensome” to require SoCalGas to comply with its legal obligations to produce its computer model and data inputs pursuant to Section 1822 and Rule 10.3.⁴³ Similarly, Cal Advocates’ request for the computer model and input data that Section 1822 and Rule 10.3 expressly identify cannot be “overly broad”.⁴⁴

Finally, SoCalGas’ offers to allow Cal Advocates to use the computer model on SoCalGas’ system or for SoCalGas to run computer model scenarios on behalf of Cal Advocates. These offers are meaningless, irrelevant, and inadequate in the context of the data request at issue.⁴⁵ Allowing Cal Advocates to access the computer model or receive outputs does not allow meaningful scrutiny or verification of the model itself, as Section 1822 requires.⁴⁶ SoCalGas’ model is a “black box”. Only SoCalGas knows the formulae, operations, and assumptions the model 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 accuracy or reasonableness of SoCalGas’ proposed revenue requirement. Mere access to the computer model is insufficient as it would not provide any insight into the functions inherent in the model. The testimony related to the model must be struck because SoCalGas has not, and purportedly cannot, provide a functional copy of the model to Cal Advocates.

⁴² Public Utilities Code Section 1822 and Rule 10.3(a).

⁴³ See *West Pico Furniture Co. of Los Angeles v. Superior Court* (1961) 56 Cal.2d 407, 417–418 (“Oppression must not be equated with burden. The objection based upon burden must be sustained by evidence showing the quantum of work required, while to support an objection of oppression there must be some showing either of an intent to create an unreasonable burden or that the ultimate effect of the burden is incommensurate with the result sought. ... [S]ome burden is inherent in all demands for discovery. The objection of burden is valid only when that burden is demonstrated to result in injustice.”).

⁴⁴ Public Utilities Code Section 1822; Rule 10.3(a).

⁴⁵ Appendix 8, SCG Supplement to DR 9 at Supplemental Response 2a.

⁴⁶ Public Utilities Code Section 1822(a) (“Any computer model that is the basis for any testimony or exhibit in a hearing or proceeding before the commission shall be available to, and subject to verification ...”).

B. The Commission should strike Chapter V of SoCalGas' Testimony in its entirety.

In DR 9, Cal Advocates asked SoCalGas to provide its calculations and the model that purportedly support the conclusion stated in Chapter V of SoCalGas' testimony that the "forecasted revenue requirement for the AMIR Project is approximately \$3.76 billion over the years 2026 through 2071."⁴⁷ In response to DR 9, SoCalGas identified the computer model that supports its revenue requirement as the computer model at issue here.^{48 49} Accordingly, SoCalGas' testimony related to its revenue requirement is directly based on SoCalGas' unverified and unproduced computer model.

Chapter V of SoCalGas' Testimony addresses SoCalGas' revenue requirement which, as explained above, relies on SoCalGas' unproduced and unverified computer model. The Application states that Chapter V presents SoCalGas's cost recovery proposal related to its "forecasted revenue requirement, proposed cost allocation methodology, and natural gas rate and customer bill impacts."⁵⁰ Chapter V of SoCalGas' Testimony states that it "presents SoCalGas's cost recovery related to" its forecasted revenue requirement, cost allocation methodology, and rate and bill impacts.⁵¹ Chapter V of SoCalGas' Testimony presents its forecasted revenue requirement, which serves as the

⁴⁷ Appendix 1, DR9 at 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.'").

⁴⁸ Appendix 2, SoCalGas Response to DR 9 at Response 2a (stating that its computer model is a "revenue requirement model").

⁴⁹ See Appendix 7, Email from SoCalGas, April 28, 2026.

⁵⁰ Application at 9-10, 12.

⁵¹ SCG Testimony Chapter V at PG/SW/JC-1.

basis for revenue,⁵² rate base,⁵³ cost allocation,⁵⁴ and rate and bill impacts.⁵⁵

Accordingly, all of Chapter V of SoCalGas' Testimony relies on, and is inextricably intertwined with, SoCalGas' unverified and unproduced computer model. Therefore, the Commission should strike Chapter V of SoCalGas' testimony in its entirety.

Similarly, portions of Chapter I of SoCalGas' Testimony relate to and summarize Chapter V of SoCalGas' Testimony and SoCalGas' revenue requirement.⁵⁶ Specifically, the first paragraph of Chapter I expressly refers to Chapter V and discusses SoCalGas' forecasted revenue requirement.⁵⁷ Therefore, the Commission should strike the first paragraph on page JW-1 of Chapter I of SoCalGas' Testimony.

Cal Advocates preserves its right to identify and exclude other testimony and evidence based on SoCalGas' unproduced and unverified computer model.

III. CONCLUSION

Cal Advocates moves to strike all testimony based on SoCalGas' computer model due to SoCalGas' violation of the Sections 581 and 1822 and Commission Rules 10.3 as well as Cal Advocates' due process rights. Currently, all of Chapter V and the first paragraph of Chapter I of SoCalGas' Testimony are based on SoCalGas' computer model. Therefore, the Commission should strike Chapter V of SoCalGas' testimony in its entirety, as well as the first paragraph of Chapter I.

⁵² SCG Testimony Chapter V at PG/SW/JC-3 (revenue requirement).

⁵³ SCG Testimony Chapter V at PG/SW/JC-4 to 5 ("The annual revenue requirement amount associated with the return of capital is equal to the amount of capital that is depreciated each year . . .").

⁵⁴ SCG Testimony Chapter V at PG/SW/JC-5 to 6 ("SoCalGas proposes to allocate the gas transportation revenue requirement changes associated with the AMIR Project proportionally . . .").

⁵⁵ SCG Testimony Chapter V at PG/SW/JC-6 ("Table V-6 below summarizes the current and proposed Residential and Core C&I gas 6 transportation rates to recover costs associated with the AMIR Project. ***These rates are calculated using the forecasted revenue requirement*** for the 2026–2035 period, as detailed in Table V-4.") (Emphasis added).

⁵⁶ See A.25-12-019, *Prepared Direct Testimony of Jennifer L. Walker on Behalf of Southern California Gas Company (U 904 G) (CHAPTER I – Overview)* (SCG Testimony Chapter I), Dec. 30, 2025, at JW-1 (expressly discussing Chapter V and forecasted revenue requirement).

⁵⁷ SCG Testimony Chapter I at JW-1.

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May 29, 2026

APPENDIX-01

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



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<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
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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

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

- 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

Asset Category (FERC Account)	Useful Life Years
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

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

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:

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

RESPONSE 2:

See the table below.

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

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

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:

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

RESPONSE 2:

See the table below.

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

Appendix 05

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

From: [Mandelbaum, Caryn L.](#)
To: SMortazavi@socalgas.com; 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>
Sent: Tuesday, April 21, 2026 3:46 PM
To: Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>; Healy, Gregory <GHealy@socalgas.com>
Cc: Chitadje, Charlotte <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

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

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

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

Cc: Chitadje, Charlotte <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

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>

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

To: Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>; Healy, Gregory <GHealy@socalgas.com>

Cc: Chitadje, Charlotte <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

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

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

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

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>
Sent: Tuesday, April 21, 2026 3:46 PM
To: Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>; Healy, Gregory <GHealy@socalgas.com>
Cc: Chitadje, Charlotte <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

From: Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>
Sent: Tuesday, April 21, 2026 12:55 PM
To: Mortazavi, Setareh <SMortazavi@socalgas.com>; Healy, Gregory <GHealy@socalgas.com>
Cc: Chitadje, Charlotte <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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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

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

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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

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E-mail: SMortazavi@socalgas.com

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

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

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

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>

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

To: Mandelbaum, Caryn L. <Caryn.Mandelbaum@cpuc.ca.gov>; Healy, Gregory <GHealy@socalgas.com>

Cc: Chitadje, Charlotte <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

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

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

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

Cc: Chitadje, Charlotte <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**

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
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(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.

Asset Category (FERC Account)	Useful Life Years
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.

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(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.