

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of Southern California Gas
Company (U 904 G) for Approval of the
Branch Offices Closure Proposal.

Application 25-05-001
(Filed May 2, 2025)

OPENING BRIEF OF THE UTILITY REFORM NETWORK



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I. INTRODUCTION

Pursuant to Rule 13.12 of the Commission’s Rules of Practice and Procedure, and in keeping with the procedural schedule first set in the Assigned Commissioner’s Scoping Memo and Ruling (Scoping Memo), on August 18, 2025, and subsequent Email Ruling Establishing the Remaining Procedural Schedule on February 12, 2026, as modified by the Email Ruling Canceling Evidentiary Hearing and Revising the Procedural Briefing Schedule on May 15, 2026, The Utility Reform Network (TURN) submits this brief opposing the application of Southern California Gas Company (SoCalGas) for approval of the closure of its branch offices. As set forth in detail below TURN explains that SoCalGas has failed to demonstrate that the closure of all remaining branch offices “is reasonable and in the best interest of its customers and that such closure will not disproportionately impact vulnerable customers.”¹

II. PROCEDURAL HISTORY

On May 2, 2025, SoCalGas filed Application (A.) 25-05-001 seeking authorization to close its remaining forty-three branch offices. In testimony supporting the application, SoCalGas asserted that the branch offices are high-cost assets having the highest cost-per-transaction impact amongst all SoCalGas’s customer service channels.²

On June 11, 2025, the Small Business Utility Advocates (SBUA), Utility Workers of America, AFL-CIO, Local 132 and International Chemical Workers Union Locals 350c (Unions), and TURN filed protests to the application. SoCalGas replied to the protests on June 23, 2025. The Commission also granted the motion for party status filed by the Public Advocates Office on June 13, 2025.

¹ D.16-06-046, p.7.

² Ex. SoCalGas-01.

A prehearing conference was noticed on June 17, 2025, and held on July 11, 2025. On August 18, 2025, the Scoping Memo issued setting a schedule and setting forth twelve issues for consideration.³ In keeping with the Scoping Memo, the intervening parties submitted testimony on October 22, 2025.⁴ On November 7, 2025, SoCalGas served all parties with Rebuttal Testimony.⁵ In January and February 2026, the Commission held a series of Public Participation Hearings both in person and virtually.

Collectively, as set out in detail below, the record demonstrates that the application should be denied.

III. LEGAL STANDARDS AND BURDEN OF PROOF

SoCalGas seeks authorization to decrease the services available to its customers by closing all of its remaining branch offices in exchange for a relatively modest reduction in rates. As the applicant, SoCalGas bears “the burden of affirmatively establishing the reasonableness of all aspects of its application. Intervenors do not have the burden of proving the unreasonableness of [the utility’s] showing.”⁶ This burden required the utility to establish that its proposal is consistent with its legal obligation, pursuant to § 451 of the Public Utilities Code, to furnish its customers with “such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities . . . as are necessary to promote the safety, health, comfort, and convenience of [its] patrons, employees, and the public.”⁷ SoCalGas must overcome the presumption that the current level of service and existing rates are reasonable.⁸

³ Assigned Commissioner’s Scoping Memo and Ruling, Aug. 18, 2025.

⁴ Ex. TURN-01; Ex. SBUA-01; Ex. Unions-01.

⁵ Ex. SoCalGas-02.

⁶ *See, e.g.*, D.06-05-016 at p. 7.

⁷ Cal. Pub. Util. Code § 451.

⁸ D.00-02-046 at p. 35 (“The presumption is that the existing rates are reasonable and lawful.”) (*citing Southern Counties Gas Company* (1952) 51 CPUC 533; *Citizens Utilities Company* (1953) 52 CPUC 637; *Park Water Company* (1955) 54 CPUC 498).

When evaluating whether the closure of branch offices is consistent with a utility's § 451 obligations, the Commission has previously considered two factors. First, the Commission has considered whether customers would have reasonably comparable alternatives to the level of service offered by a branch office if the branch office were to close.⁹ This inquiry has considered both whether customers would have an opportunity to make payments in person at a conveniently located facility¹⁰ and whether customers would have reasonably comparable alternatives for receiving the non-payment services provided by the branch office.¹¹ Second, the Commission has evaluated whether the impact of closing branch offices would fall disproportionately on customers who are low income, elderly, or who have disabilities, because branch offices play an especially important role in serving such customers.¹²

Consistent with this framework, SoCalGas must demonstrate — with a preponderance of evidence¹³ — in this proceeding that (1) customers¹³ who currently use branch offices will receive reasonably comparable service in their absence, and (2) the proposed closures will not disproportionately impact customers who are low-income, elderly, or who have disabilities. In evaluating whether SoCalGas has met its burden, the Commission must be mindful of its regulatory responsibility to ensure that SoCalGas “provides adequate service at just and reasonable rates.”¹⁴ Consistent with its prior decisions on branch office closures, the

⁹ D.92-08-038, pp. 17-18; D.07-05-058 at pp. 10, 14; D.16-06-046, pp. 6-7.

¹⁰ See D.92-08-038 (discussing the line of Commission decisions addressing payment offices, originating in 1913); D.16-06-046, pp. 6-7.

¹¹ See D.92-08-038, pp. 14, 25-27; D.08-07-046, issued in A.06-12-009 et al., at pp. 20-21; D.16-06-046, pp. 6-7.

¹² D.92-08-038, pp. 13, 19; D.16-06-046, pp. 6-7.

¹³ See, e.g., D.09-07-024, *Order Modifying Decision* 08-12-058 and *Denying Rehearing of Decision, as Modified*, issued in A.06-08-010 (SDG&E's Request for a CPCN for the Sunrise Powerlink Transmission Project), at p. 3 (noting that the preponderance of evidence standard is generally the default standard in administrative proceedings, although the Commission has applied the clear and convincing standard in general rate cases and reasonableness reviews); D.21-11-036, p. 6.

¹⁴ D.01-10-031, *Order Granting Rehearing of and Modifying Decision* 00-02-046, at p. 5.

Commission's decision here must turn on its consideration of the needs of customers who use the branch offices, particularly the most vulnerable of those customers.

IV. ARGUMENT

The Commission should deny the utility's application for five reasons:

- SoCalGas failed to comply with the Commission's directive in D.16-06-046 to conduct a *careful* study on the impacts to low-income customers, elderly, and disabled customers. SoCalGas admits that it did not collect this data in the survey and cannot provide the impact to these customers.
- Because of the failure to conduct a careful study, SoCalGas has not demonstrated that this branch office closures will not have a disproportionate impact on customers who are low-income, elderly, who have disabilities, or who are otherwise vulnerable.
- SoCalGas cannot demonstrate that its Customer Contact Center (CCC) is prepared to handle the influx of calls pursuant to branch office closures.
- SoCalGas's reliance on Authorized Payment Locations (APL) as the in-person alternative for payments is precarious.
- Any cost savings to ratepayers by the closure of the branch offices is miniscule, at best.

A. SoCalGas's Customer Survey was Insufficient

The Commission has long recognized that branch offices serve a function that extends beyond bill payment — they are, for many customers, the only reliable point of access to SoCalGas for transactions that require human assistance, identity verification, real-time account

resolution, and navigation of assistance programs.¹⁵ When SoCalGas last sought to close branch offices, the Commission required that before filing any future application, it first conduct “a careful study on the impacts to low-income customers, elderly, and disabled customers.”¹⁶ That directive was not a mere procedural formality and reflected the Commission’s recognition that branch office closures fall disproportionately on the customers least able to absorb them.¹⁷ Before authorizing the permanent closure of all forty-three remaining branch offices, the Commission must determine that SoCalGas has made an adequate showing that vulnerable customers will not be left without reasonably comparable alternatives. TURN submits that SoCalGas has made no such showing.

SoCalGas claims to have satisfied the Commission’s directive through three surveys: a 2023 bill insert survey included in all bills system-wide, a 2024 online survey that was posted publicly, and a 2024 in-person survey at select branch offices.¹⁸ The bill insert survey was limited to payment preferences.¹⁹ The online survey, while broader in scope, was available only in English and Spanish — two languages out of the more than 150 in which SoCalGas’s own Customer Contact Center serves customers.²⁰ The in-person survey, which was the only survey channel that did not depend on language literacy or internet access, was conducted at select branch offices rather than across all forty-three locations — meaning that customers served by the majority of branch offices had no accessible survey option at all.²¹ The combined response rate across surveys was 0.07%, yielding 4,282 respondents out of approximately six million

¹⁵ D.16-06-046, p. 36; D.08-07-046, p. 21.

¹⁶ D.16-06-046, p. 45.

¹⁷ D.92-08-038, p. 2.

¹⁸ Ex. SoCalGas-01, pp. JSA-23-29.

¹⁹ Ex. SoCalGas-01, p. JSA-23.

²⁰ Ex. SoCalGas-01, pp. JSA-12, JSA-25.

²¹ Ex. SoCalGas-01, p. JSA-28.

customers.²² That response rate is particularly telling because the bill insert survey was distributed system-wide to all customers, not targeted to branch office users, meaning SoCalGas had maximum distribution reach and still heard from fewer than one in a thousand customers. Fifty-seven percent of even that self-selected pool opposed closure, which only underscores how inadequate the survey record is as a basis for the conclusion that customers are prepared to transition.²³ Critically, none of the three surveys was designed to capture why customers use branch offices for non-payment transactions — the category of service the Commission has previously identified as the most difficult to replicate through alternatives.²⁴

Because of the inadequacy of the surveys, SoCalGas cannot answer the most basic — and commission-mandated — question: who is using the branch offices for non-payment transactions, and why? SoCalGas acknowledges it does not have demographic data for non-payment transaction users.²⁵ It cannot identify whether those customers are low-income, elderly, disabled, unbanked, limited-English proficient, or some combination. Without that information, SoCalGas cannot demonstrate, nor can the Commission find, that the proposed alternatives provide reasonably comparable service to the customers who need it most. A study that cannot identify the population whose impacts it is charged with assessing does not constitute the careful study D.16-06-046 requires.

The significance of that gap is compounded by what SoCalGas’s own transaction data reveals. Table 1-9 of SoCalGas’s direct testimony shows that non-payment transactions at branch offices have increased steadily since 2022 — from 38,091 in 2022, to 55,900 in 2023, to 66,360

²² Ex. SoCalGas-01, Attachment F, pp. 4, 6; Ex. TURN-01, p. 7.

²³ Ex. SoCalGas-01, Attachment F, pp. 4, 6.

²⁴ D.16-06-046, p. 36.

²⁵ Ex. TURN-01 (SoCalGas Resp. to TURN-SCG-1, Q.1c.).

in 2024.²⁶ Far from demonstrating a declining need for in-person non-payment assistance, SoCalGas’s own record establishes the opposite trend. A study designed to satisfy D16-06-046’s mandate to assess impacts on vulnerable customers should have probed this trend. SoCalGas’s surveys did not.

The consequences of SoCalGas’s inadequate survey are not abstract. Consider a customer at risk of disconnection. That customer’s situation illustrates precisely the gap the surveys cannot see: a customer who needs real-time account resolution at the point of payment, whose alternatives require two sequential steps — an APL visit and a successful contact center call — neither of which individually accomplishes what a single branch office visit does. Or consider a customer whose need for branch office service has nothing to do with payment at all, and for whom an APL is no substitute by definition.²⁷ SoCalGas cannot tell the Commission how many customers like these exist, where they are concentrated, or what happens to them if the offices close.

The Commission directed SoCalGas to conduct “a careful study on the impacts to low-income customers, elderly, and disabled customers” before filing any future application to close branch offices.²⁸ A study that cannot identify who is making non-payment transactions does not satisfy that directive. For this reason, and for those set forth below, the Commission should deny SoCalGas’s application.

²⁶ Ex. SoCalGas-01, p. JSA-14, Table 1-9.

²⁷ Ex. SBUA-02, p. 3; Ex. Unions-01, Casillas Decl., ¶ 6.

²⁸ D.16-06-046, p. 45.

B. The Most Vulnerable Customers Will Bear the Highest Impact

SoCalGas’s surveys cannot identify the customers most likely to be harmed by branch office closures. But the record, read as a whole, illustrates who those customers are and why the proposed alternatives fail them.

Consider first a customer who has received a shutoff notice and needs to make a payment before the disconnection is processed. At a branch office, that transaction is complete in a single visit: the customer pays, the payment posts to the account in real time, and a branch office representative can immediately flag the account to prevent disconnection.²⁹ After closure, that same customer must go to an APL, where payment data updates on a roughly hourly cycle rather than in real time, and then separately call a CCC to report the payment and request that the shutoff be held.³⁰ SoCalGas characterizes this as a workable alternative: the customer receives a “smart receipt confirmation number” that a CCC representative “can immediately note . . . in the customer’s account.”³¹ But the confirmation number is not self-executing. It does not stop a disconnection. It requires the customer to successfully navigate the CCC — an AI-routed phone tree³² — reach a live representative, and have the account manually notated before the shutoff order processes. In 2023, only 58.95% of CCC calls were answered within 60 seconds, with an average speed of answer of 236 seconds.³³ Average handle time in 2024 was 273 seconds.³⁴ A customer who cannot afford an unpredictable queue — because of work, childcare, or any other constraint on their time — faces a real risk that a successful APL payment will not prevent disconnection.

²⁹ Ex. Unions-01, Casillas Decl., ¶ 5; Ex. SoCalGas-02, p. JSA-4.

³⁰ Ex. SoCalGas-02, p. JSA-4.

³¹ Ex. SoCalGas-02, p. JSA-4.

³² Ex. SBUA-01, p. 4-5.

³³ Ex. SoCalGas-01, p. JSA-20, Table 1-11.

³⁴ Ex. SoCalGas-01, p. JSA-20, Table 1-11.

That risk compounds significantly for a customer who is unbanked. SoCalGas's online payment options require either a bank account or a \$1.50 credit or debit card fee per transaction.³⁵ Two percent of the online survey respondents reported having no bank account.³⁶ For an unbanked customer, the APL is not one option among several — it is the only in-person payment option available. The two-step sequence is not an inconvenience; it is the entire path to avoiding disconnection, with no alternative if either step fails.

Now consider a customer who does not come to a branch office to pay a bill at all. Branch office employees assist customers in transferring service when a spouse dies and the surviving partner needs to change account ownership, completing identity verification for customers who are more comfortable presenting documents in person than uploading them online, initiating California Alternate Rates for Energy (CARE) applications and Energy Savings Assistance Program (ESAP) enrollment, and processing service orders for customers who need gas turned on or off.³⁷ None of these transactions can be completed at an APL.³⁸ SoCalGas's answer is the CCC. But the CCC is staffed by representatives who have no connection to the local community and no familiarity with the specific, often non-standard circumstances that branch office employees routinely navigate.³⁹ A CCC representative following standard procedure may request documentation a customer cannot produce, fail to recognize a situation requiring flexibility, or simply be unable to resolve in a phone call what a branch office employee can resolve face to face.⁴⁰ For elderly customers in particular — who may be arriving alone, after the death of a spouse, with documents in hand and no one to help them navigate a

³⁵ Ex. SoCalGas-01, p. JSA-2, fn. 7; Ex. SBUA-01, p. 10, Table.

³⁶ Ex. TURN-01, p. 8.

³⁷ Ex. Unions-01, Casillas Decl., ¶¶ 5, 6.

³⁸ Ex. SBUA-01, p. 8; D.16-06-046, p. 36.

³⁹ Ex. SBUA-01, p. 6.

⁴⁰ Ex. SBUA-01, p. 6.

phone tree — the difference between a branch office visit and a CCC call is not a matter of channel preference. It is a matter of whether the transaction gets done at all.

For a third category of customer, the failure begins earlier — at the survey stage itself. SoCalGas’s online survey was available only in English and Spanish.⁴¹ SoCalGas’s own CCC serves customers in over 150 languages through Language Line Services.⁴² The gap between those two facts means that a significant portion of SoCalGas’s linguistically isolated customers were categorically excluded from the survey population.⁴³ SoCalGas’s application is built on the premise that customers have demonstrated an ability to transition to alternative channels. But that premise rests on survey data that systematically excluded the customers least likely to make that transition. The record contains no basis for the Commission to find otherwise. This gap is not incidental. According to SoCalGas’s own survey data, Spanish speakers would most rely on an APL and paying by phone, while non-English speakers generally are more likely to use in-person payment options.⁴⁴ What the surveys cannot tell the Commission is how customers who speak neither English nor Spanish would navigate a closure — because those customers were never asked.

SoCalGas’s response to nearly every gap identified above is the same: customers can call the CCC. Customers who cannot complete a transaction at an APL — call the CCC. Customers who need to stop or transfer service — call the CCC. Customers who need to flag a payment to prevent disconnection — call the CCC. But SoCalGas has not demonstrated that its CCC can absorb the increased volume that branch office closures will generate without compromising the service levels on which that answer depends. The record raises serious doubts that it can.

⁴¹ Ex. SoCalGas-01, p. JSA-25.

⁴² Ex. SoCalGas-01, p. JSA-12.

⁴³ Ex. TURN-01, p. 6.

⁴⁴ Ex. SBUA-01, p. 16, fn. 13.

C. The Customer Contact Center is Not Prepared for Increased Volume

SoCalGas's own data tells the story. Table 1-11 of SoCalGas's direct testimony shows SoCalGas's Customer Contact Center (CCC) performance metrics from 2017 through 2024.⁴⁵ In three of those eight years, SoCalGas failed to answer 60% of calls within 60 seconds. In 2023, average wait time spiked to 236 seconds — nearly four minutes just to reach a representative — and only 58.95% of calls were answered within the 60-second threshold.⁴⁶ SoCalGas attributes that spike entirely to high gas commodity prices, characterizing it as an external, non-recurring factor.⁴⁷ But the 2023 spike illustrates precisely the problem: CCC performance is sensitive to increased call volume from any source. Branch office closures are a certain and permanent source of increased volume that SoCalGas has not modeled, not a contingent one.

SoCalGas has not provided any analysis of how many branch office transactions will migrate to the CCC following closure, what the resulting impact on wait times and abandonment rates will be, or what staffing adjustments, if any, it plans to make.⁴⁸ The 133,480 customers who exclusively used branch offices after the pandemic reopening⁴⁹ represent a known, quantifiable pool of customers who will need to find another channel. A portion of them — particularly those seeking non-payment assistance, which has been increasing since 2022⁵⁰ — will have no alternative but the CCC (unless they have internet access and an online account and feel comfortable using it for non-payment transactions where the option exists). SoCalGas has offered no estimate of what that portion looks like or what it means for CCC capacity.

⁴⁵ Ex. SoCalGas-01, p. JSA-20, Table 1-11.

⁴⁶ Ex. SoCalGas-01, p. JSA-20, Table 1-11.

⁴⁷ Ex. SoCalGas-02, p. JSA-10.

⁴⁸ Ex. TURN-01, p. 9.

⁴⁹ Ex. SoCalGas-01, Attachment B, p. 2

⁵⁰ Ex. SoCalGas-01, p. JSA-14, Table 1-9

The consequences for the customers described above are direct. The at-risk-of-disconnection customer's entire path to avoiding shutoff runs through the CCC. The non-payment transaction customer has no other option, other than *potentially* online. For both, the adequacy of the CCC is not an abstract service quality question — it is the difference between a transaction that gets completed and one that does not. A record that cannot answer basic questions about post-closure CCC volume cannot support a finding that the CCC provides a reasonably comparable alternative to the branch office.

D. SoCalGas's Reliance on APLs as the In-Person Alternative is Precarious

For in-person payment, SoCalGas offers APLs as the alternative available. However, SoCalGas only commits to maintaining at least one APL within seven miles of each former branch office location for three years following a Commission decision.⁵¹ That commitment does not protect the overall number of APLs in the system, and it expires. APLs are third-party businesses — check cashers, grocery stores, and similar retailers — for whom processing SoCalGas payments is incidental to their primary operations.⁵² SoCalGas exercises only indirect oversight over them through its contract with Fiserv.⁵³ Nothing in the record requires any individual APL to remain in the network, and nothing obligates SoCalGas to replace an APL that exits after the three-year commitment period ends. For the customers who will depend on APLs as their sole in-person payment option following branch office closure — particularly unbanked customers for whom no other channel is available — the adequacy of APL access must be a durable condition of any approval, not a time-limited assurance that dissolves before the GRC cycle turns.

⁵¹ Ex. SoCalGas-01, p. JSA-12.

⁵² Ex. SBUA-01, p. 8.

⁵³ Ex. SoCalGas-02, p. JSA-4.

E. Cost Savings to Ratepayers Are Speculative and Exaggerated

Even setting aside the service deficiencies catalogued above, the financial case for closure is less straightforward than SoCalGas presents. SoCalGas frames this proceeding as one that will deliver cost savings to ratepayers, pointing to \$18.8 million in 2024 branch office operating costs and proposing to return the savings through the Core Fixed Cost Account.⁵⁴ But that framing obscures several deductions that will significantly reduce cost savings ratepayers may actually receive.

SoCalGas proposes to net out closure costs of \$3.0 to \$5.0 million against any savings returned to ratepayers.⁵⁵ It further proposes to deduct \$295,000 in incremental annual APL costs.⁵⁶ And critically, SoCalGas has not provided an accurate and final estimate of the costs associated with the lease termination obligations it intends to deduct — describing them only as “contingent based on applicable terms of SoCalGas’s existing contractual lease agreements.”⁵⁷ SoCalGas points to Tables 1-14 and 1-15 of its direct testimony as providing the necessary cost information — specifically, \$2,424,844 in 2024 actual lease costs and \$473,100 in forecasted lease contract expiration obligations.⁵⁸ But the \$473,100 figure covers only costs associated with leases that expire on their natural schedule if SoCalGas’s proposal is approved in 2026. It does not account for early termination penalties on leases that have not yet run their course, which are the costs that will actually determine the size of the deduction SoCalGas proposes to take against ratepayer savings. SoCalGas’s own application acknowledges that closures will occur “in conformance with applicable leasehold terms for each branch office,” which necessarily implies

⁵⁴ Ex. SoCalGas-01, pp. JSA-1, JSA-33-34.

⁵⁵ Ex. SoCalGas-01, p. JSA-4.

⁵⁶ Ex. SoCalGas-01, p. JSA-4.

⁵⁷ Ex. TURN-01, p. 10; SoCalGas Application, p. 5.

⁵⁸ Ex. SoCalGas-02, pp. JSA-12-13.

that some leases will require negotiated exits before their natural expiration. Those costs remain unquantified. The Commission cannot evaluate the full scope of a deduction SoCalGas has reserved the right to take based on a figure that addresses only the portion of that deduction tied to leases expiring on schedule. TURN therefore recommends that the Commission require SoCalGas to provide a concrete estimate of lease termination costs or exclude such unquantified costs from any deductions against ratepayer savings.

On the other hand, the savings figure is understated because SoCalGas anchors it to the \$17.9 million branch office revenue requirement authorized in the TY 2024 GRC without accounting for post-test year escalation.⁵⁹ In D.24-12-074, the Commission authorized 3% escalation of TY 2024 costs in post-test years 2025, 2026, and 2027.⁶⁰ SoCalGas's failure to apply that escalation means the savings credited to ratepayers in each post-test year will be understated by the amount of the authorized escalation. SoCalGas did not respond to this point in rebuttal.⁶¹ The Commission should require SoCalGas to return the full authorized amount for each applicable year, including post-test year escalation.

Finally, the incremental costs SoCalGas has accounted for — APL costs of \$295,000 annually — do not capture potential future costs of the channel migration SoCalGas is proposing. SoCalGas has not modeled the cost of the CCC volume increases that will result from closing the branch offices, nor the staffing adjustments that could be required to maintain acceptable service levels.⁶² Those costs, if requested by SoCalGas in its next GRC and authorized by the Commission, will offset savings that SoCalGas is already presenting in the most favorable possible light. Ratepayers are being asked to absorb a degradation in service in

⁵⁹ Ex. SoCalGas-01, p. JSA-34.

⁶⁰ D.24-12-074, p. 895; Ex. TURN-01, p. 10.

⁶¹ Ex. SoCalGas-02.

⁶² Ex. TURN-01, p. 9.

exchange for savings that are unquantified, partially unverifiable, and potentially far smaller than advertised.

V. CONCLUSION

For the reasons set forth above, the Commission should deny SoCalGas's application to close its forty-three remaining branch offices.

Date: May 29, 2026

Respectfully submitted,

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