

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



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Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028.

Application 26-06-014

And Related Matter.

Application 26-06-015

JOINT PREHEARING CONFERENCE STATEMENT

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THE INDICATED SHIPPERS

July 21, 2026

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

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028.	Application 26-06-014
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JOINT PREHEARING CONFERENCE STATEMENT

I. INTRODUCTION

Pursuant to the *Administrative Law Judge's Ruling Setting Remote Prehearing Conference* dated July 8, 2026 (Ruling), San Diego Gas & Electric Company, (SDG&E), Southern California Gas Company (SoCalGas), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), the Utility Consumer's Action Network (UCAN), Small Business Utility Advocates (SBUA), Southern California Generation Coalition (SCGC), The Protect Our Communities Foundation (PCF), the Coalition of California Utility Employees (CUE), San Diego Community Power (SDCP), Clean Energy Alliance (CEA), California Environmental Justice (CEJA), Mussey Grade Road Alliance (MGRA), Utility Workers Union of America, AFL-CIO, Local 483 (UWUA Local 483), Utility Workers Union of America, AFL-CIO, Local 132 (UWUA Local 132), City of Vernon, Vernon Public Utilities (City of Vernon), City of Long Beach, Long Beach Utilities (City of Long Beach), the California State Pipe Trades Council (CSPTC), United Association Local Union 250 (UA Local 250), Climate Action Campaign (CAC), Center for Accessible Technology (CforAT),

the Indicated Shippers (IS), and Southern California Edison Company (SCE) jointly file this prehearing conference (PHC) statement in advance of the July 24, 2026 PHC.¹

II. THE PARTIES' EFFORTS TO PREPARE THE JOINT PHC STATEMENT

The Ruling states as follows: “This ruling also directs the parties to file and serve a joint PHC statement, by 3:00 p.m. on July 21, 2026. The PHC statement shall identify and provide the following:

- The name, phone number and e-mail address of individuals intending to speak at the PHC, and, in the case of multiple representatives for the same party, indicate who is designated as the primary party representative;
- Objections to the preliminary categorization;
- Proposed scope of the proceeding.”²

On July 10, 2026, counsel for SDG&E and SoCalGas sent an email to the service lists in the (1) the TY 2028 GRC (A.26-06-014/015 (cons.)), (2) the TY 2024 GRC (A.22-05-015/016 (cons.)), and (3) the RAMP Proceeding (A.25-05-010/013 (cons.)) to initiate the coordination and preparation of the Joint PHC Statement. All parties who responded to the email were asked to contribute to the Joint PHC Statement by providing their respective positions on the three issues identified in the Ruling. The parties' responses are captured below. Inclusion of a party's position on this Joint PHC statement does not mean or imply agreement by any other party to the arguments, positions or proposals asserted herein.

¹ Pursuant to Rule 1.8(d), counsel for SDG&E certifies that he has been fully authorized by SoCalGas, Cal Advocates, TURN, UCAN, SBUA, SCGC, CUE, SDGP, CEA, PCF, UWUA Local 483, UWUA Local 132, CEJA, MGRA, City of Vernon, City of Long Beach, CSPTC, UA Local 250, CAC, CforAt, IS, and SCE to submit this joint PHC statement on their behalf.

² Ruling, p. 2.

III. THE PARTIES' RESPECTIVE POSITIONS ON ISSUES SET FORTH IN RULING

A. SDG&E & SoCalGas

SDG&E and SoCalGas are jointly represented by attorneys Roger A. Cerda and Elliott S. Henry. For purposes of the PHC, SDG&E's primary party representative for the PHC is Roger A. Cerda, (858) 654-1781, rcerda@sdge.com. SoCalGas's primary party representative for the PHC is Elliott S. Henry, (213) 244-8234, ehenry@socalgas.com. SDG&E and SoCalGas agree with the preliminary categorization of this proceeding as "ratesetting." As set forth in their Applications, SDG&E's and SoCalGas's proposed scope of this proceeding is as follows:

1. Whether SDG&E/SoCalGas's proposed TY 2028 revenue requirements are just and reasonable and should be adopted by the Commission and reflected in rates;
2. Whether SDG&E/SoCalGas's proposed post-test year ratemaking mechanisms are just and reasonable; and
3. Whether SDG&E/SoCalGas's regulatory accounts proposals are just and reasonable.

B. Cal Advocates

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) is represented by Marion Peleo, Roderick Hill, and Layla Labagh. Cal Advocates' primary party representative for the PHC is Marion Peleo, (415) 703-2130, marion.peleo@cpuc.ca.gov. Cal Advocates agrees with the preliminary categorization of this proceeding as "ratesetting." As set forth in its protest, Cal Advocates proposes that the scope of this proceeding include the following issues:

- Whether SDG&E's request to increase its authorized revenues for gas and electric service including all operating expenses and capital costs is just and reasonable;
- Whether SoCalGas's request to increase its authorized revenues for gas service including all operating expenses and capital costs is just and reasonable;

- Whether Sempra Utilities’ proposed post-test-year earnings sharing mechanism is reasonable;
- Whether Sempra Utilities’ proposed staffing levels are reasonable;
- Whether Sempra Utilities’ costs associated with replacing aging and/or obsolete equipment, including its metering infrastructure, and other proposed capital expenditures are reasonable;
- Whether Sempra Utilities’ depreciation assumptions and associated parameters are reasonable;
- Whether Sempra Utilities’ working cash, lead-lag study, and other rate base items are reasonable;
- Whether Sempra Utilities’ forecasts of operations and maintenance, customer service, and administrative and general expenses are reasonable;
- Whether Sempra Utilities’ requests for post-test year revenue increases are reasonable;
- Whether Sempra Utilities’ proposals to establish, eliminate, modify or continue certain balancing and memorandum accounts are reasonable and should be adopted;
- Whether Sempra Utilities’ safety and risk management presentation is reasonable, including:
 - Whether Sempra Utilities have complied with the Administrative Law Judge’s Ruling in the 2025 Risk Assessment and Mitigation Phase (RAMP) proceeding and addressed intervenor comments;
 - Whether Sempra Utilities have adequately evaluated and selected the most cost-effective and efficient risk mitigation alternatives and included complete ratepayer costs in their TY 2028 GRC Application;
 - Whether Sempra Utilities have considered the impact on ratepayers from rate increases, delays, and failures to complete necessary risk mitigation program implementation; and
- Whether Sempra Utilities’ other policy-related proposals are reasonable.

C. TURN

The Utility Reform Network (“TURN”) is represented by attorney David Cheng. TURN’s primary party representative for the PHC is David Cheng, (858) 248-3021, dcheng@turn.org.

TURN agrees with the preliminary categorization of this proceeding as “ratesetting.” As noted by TURN in its protest, TURN believes that SoCalGas and SDG&E’s (together, “Sempra Utilities”) application presents at least the following additional issues:

- Whether Sempra Utilities’ application complies with the ALJ ruling in the RAMP proceeding (A.25-05-010), issued on March 4, 2026, requiring Sempra Utilities to address deficiencies in its GRC filing regarding comparability of risk-scaled analyses, RAMP cycle comparability, tranching method reporting, connection between Cost-Benefit Ratio and the mitigation selection, and others.³
- Whether Sempra Utilities’ application complies with AB 2666, which directed the Commission to establish guidelines and adopt processes regarding the reporting and tracking of actual versus forecasted rates of return, and D.24-12-074, which ordered Sempra Utilities to provide information regarding actual annual rates of return compared to forecasted annual rates of return and identify the cost categories where projected (forecasted) costs differed from actual (recorded) costs.⁴
- Whether Sempra Utilities’ application complies with AB 1167, which prohibits electrical and gas corporations from using customer ratepayer funds for political lobbying, promotional advertising, and trade association dues.

D. UCAN

Utility Consumers’ Action Network (UCAN) is jointly represented by attorneys Jane Krikorian, Edward Lopez, and Jason Zeller. For purposes of the PHC, UCAN’s primary party representative is Jane Krikorian, (858) 205-3954, jane@ucan.org.

UCAN agrees with the preliminary categorization of this proceeding as “ratesetting.” Additionally, UCAN proposes the scope of this proceeding include the following:

- Whether SDG&E/SoCalGas’s filed testimony satisfies the requirements of SB 598 (Pub. Util. Code §718) by quantifying the relationship between its requested revenue increase and customer disconnections/arrearages.

³ A.25-05-010, ALJ Ruling Directing the Service of Additional Information and Other Requirements (March 4, 2026), pp. 1-2, 9-20.

⁴ D.24-12-074, p. 806.

- Whether SDG&E/SoCalGas’s filed testimony satisfies the requirements of D.25-12-044, Ordering Paragraph #1, and Appendix A, “Affordability Framework Filing Requirements for Electric and Gas Investor-Owned Utilities,” showing affordability impacts of the proposed revenue increases in this current GRC filing.⁵
- Whether SDG&E/SoCalGas’s filed testimony on a 10-year grid modernization plan meets the detailed vision, classification of investments, DER integration rationale, and cost effectiveness analysis first required by D.18-03-023, and any other updated and expanded guidance from the Commission regarding utility grid modernization plans.

E. SBUA

Jennifer Weberski, Litigation Supervisor of SBUA, is the party representative for the PHC. Her contact information is; jennifer@utilityadvocates.org and (703) 489-2924. SBUA agrees with the preliminary categorization of Ratesetting for the proceeding. SBUA is concerned that the proposed Scope of Issues is not reflective of the Scope of Issues included in the previous Sempra GRC Phase 1 proceeding, specifically Issues 4 through 7.⁶

F. SCGC

The name, phone number, and e-mail address of the individual intending to speak at the PHC for SCGC are the following: Norman A. Pedersen, (213) 430-2510, npedersen@hanmor.com. SCGC agrees with the preliminary categorization of this proceeding as “ratesetting.” SCGC agrees with SDG&E’s and SoCalGas’s proposed scope of this proceeding.

⁵ D.25-12-044, p.82-83, and see Appendix A.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M591/K808/591808790.PDF>

⁶ A.22-05-015/A.22-05-016, Assigned Commissioner’s Scoping Memo and Ruling, dated October 3, 2022, pp. 4-5.

G. PCF

The Protect Our Communities Foundation (PCF) is represented by attorneys Malinda Dickenson and Andrea White. PCF's primary representative for the PHC is Malinda Dickenson who can be reached at (619) 693-4788 and malinda@protectourcommunities.org. PCF agrees that this proceeding should be categorized as ratesetting. In addition to the issues broadly identified by SDG&E and SoCalGas, the following issues described in Section VII.A. of PCF's protest⁷ must be considered:

1. Alternatives to the utilities' proposals presented by intervenors, including but not limited to solar-plus-storage alternatives to SDG&E's proposed capital expenditures;
2. Compliance with Public Utilities Code section 451.8.

H. SDCP / CEA

SDCP and CEA are jointly represented by attorneys Alissa Greenwald, Jacob Schlesinger, and Nathan Carrier. SDCP and CEA's primary representative for the PHC is Alissa Greenwald, (913) 302-5567, agreenwald@keyesfox.com. SDCP and CEA agree with the preliminary categorization of "ratesetting." SDCP and CEA recommend a scope of issues substantially similar to that of SDG&E's TY 2024 GRC Phase 1, to include:

1. Whether SDG&E's proposed TY 2028 revenue requirement is just and reasonable and should be adopted by the Commission and reflected in rates;
2. Whether SDG&E's proposed post-test year ratemaking mechanism is just and reasonable;
3. Whether SDG&E's regulatory account proposals are just and reasonable;

⁷ A.26-06-014, 015, The Protect Our Communities Foundation Protest to the Consolidated Applications by SDG&E and SoCalGas for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028 (July 20, 2020), pp. 22-25.

4. Whether the costs recorded to SDG&E's Wildfire Mitigation Plan Memorandum Account are reasonable and prudent for cost recovery;
5. Whether SDG&E's Application aligns with the Commission's Environmental and Social Justice Action Plan;
6. Whether SDG&E has adequately integrated risk mitigation programs and projects into its Application that address safety risks and are reasonably balanced with the costs associated with such programs and projects; and
7. Whether SDG&E's proposed programs and expenditures align with California's climate objectives, decarbonization goals, and whether the expenditures result in just and reasonable rates.

I. CUE

CUE is represented by attorney Rachael Koss. CUE's party representative for the PHC is Rachael Koss, (650) 589-1660, rkoss@adamsbroadwell.com. CUE agrees with the preliminary categorization of this proceeding as "ratesetting." CUE agrees with SDG&E's proposed scope of this proceeding.

J. UWUA, Local 483

Utility Workers Union of America ("UWUA"), AFL-CIO, Local 483 ("UWUA, Local 483") is represented by attorneys Brandon Dimapasoc, (213)-395-0956, bdimapasoc@srholguin.com and Marcos Holguin, (213)-395-0956, mholguin@srholguin.com. For the purposes of the PHC, UWUA, Local 483's primary party representative is Brandon Dimapasoc.

UWUA, Local 483 takes no position on the preliminary categorization of this proceeding as "ratesetting."

UWUA, Local 483 proposes that the scope of this proceeding includes the following:

1. The workforce impacts and operational safety and integrity impacts of SoCalGas' proposed investments in technology-enabled operations, productivity improvements, and

workforce optimization, especially the impact of these proposed investments on staffing levels, training, shared services, contractor reliance, and changes to union-represented work;

2. The workforce impacts and operational safety and integrity impacts of SoCalGas' proposed targeted infrastructure investments, especially those impacting the Transmission Integrity Management Program ("TIMP"), the Storage Integrity Management Program ("SIMP"), and pipeline safety programs; and
3. The impacts on union-represented employees of SoCalGas' anticipated costs and proposed investments in employee medical insurance and retiree health benefits.

K. UWUA Local 132

UWUA Local 132 is represented by attorneys Julia Harumi Mass and Jenna Narahara. For the purposes of the PHC, UWUA Local 132's designated party representative is Jenna Narahara, (626) 796-7555, jnarahara@rsglabor.com. UWUA Local 132 agrees that the proceeding should be categorized as rate-setting and proposes adding the following issue to the Applicants' scope: "Whether the Applicants' proposal is adequate to promote the safety, health, comfort, and convenience of its patrons, employees, and the public as required by Section 451 of the California Public Utilities Code."

L. CEJA

The California Environmental Justice Alliance ("CEJA") is represented by Earthjustice attorneys Matthew Vespa, Sara Gersen, Rebecca Barker, and Anirudh Krishna. CEJA's primary party representative for the PHC is Matthew Vespa, (415) 310-1549, mvespa@earthjustice.org. CEJA agrees with the preliminary categorization of this proceeding as "ratesetting." Like the

Sempra Utilities’ 2024 GRC, CEJA recommends the scope of this proceeding include the following issues:⁸

Whether the Sempra Utilities’ Applications align with the Commission’s Environmental and Social Justice Action Plan, including whether proposed investments in alternative fuels, including bio-methane and hydrogen, are reasonable and sourced without disproportionately burdening disadvantaged communities with air pollution.

Whether programs align with California’s climate objectives, decarbonization goals, forecasts of future natural gas demand, and whether the expenditures result in just and reasonable rates.

In addition, since the Sempra Utilities’ last GRC, California enacted Assembly Bill (“AB”) 1167, the California Ratepayer Protection Act, which prohibits ratepayer recovery of political influence, promotional, and other activities.⁹ Scoping issues should include specific reference to AB 1167 compliance such as through addition of the following:

Whether the Sempra Utilities’ Applications comply with Assembly Bill 1167.

M. MGRA

The Mussey Grade Road Alliance (MGRA) is represented by Spokesperson Diane Conklin. MGRA’s representative at the PHC is Joseph W. Mitchell, Ph.D, (858) 228 0089, jwmitchell@mbartek.com. MGRA agrees with the preliminary categorization of this proceeding as “ratesetting.” MGRA recommends that the scope of the proceeding include the following issues:

1. Reasonability of parameters and assumptions used for mitigation selection “scenarios”,
2. Reasonability of SDG&E’s risk scaling function,
3. Accuracy and reasonability of SDG&E’s risk model, and

⁸ A.22-05-015, Assigned Commissioner’s Scoping Memo and Ruling at 4-5 (Oct. 3, 2022), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M497/K334/497334858.PDF>.

⁹ AB 1167 (2025) (adding Section 748.3 to the Public Utilities Code).

4. Whether SDG&E has correctly incorporated SDP, Party and Commission RAMP input.

N. City of Vernon

The name, phone number, and e-mail address of the individual intending to speak at the PHC for City of Vernon are the following: Lisa S. Gast, (202) 791-3601, LSG@dwgp.com.

City of Vernon agrees with the preliminary categorization of this proceeding as “ratesetting,” and the proposed scope as presented by SoCalGas in A.26-06-014.

O. City of Long Beach

The name, phone number, and e-mail address of the individual intending to speak at the PHC for Long Beach are the following: Susie Berlin, (408) 209-5837, berlin@susieberlinlaw.com. Long Beach agrees with the preliminary categorization of this proceeding as “ratesetting,” and the proposed scope as presented by SoCalGas in A.26-06-014.

P. CSPTC and UA Local 250

CSPTC and UA Local 250 are represented by attorney Rachael Koss. CSPTC’s and UA Local 250’s party representative for the PHC is Rachael Koss, (650) 589-1660, rkoss@adamsbroadwell.com. CSPTC and UA Local 250 agree with the preliminary categorization of this proceeding as “ratesetting.” CSPTC and UA Local 250 agree with SoCalGas’s proposed scope of this proceeding.

Q. SCE

SCE’s representative at the PHC is Kris Vyas, (626) 233-6736, kris.vyas@sce.com.

Objections to the preliminary categorization: SCE has no objection to the preliminary categorization of the proceeding as ratesetting, and SCE notes that the large IOU GRCs are routinely and consistently categorized as ratesetting.

Proposed scope of the proceeding: SCE takes no position on this issue at this time, and respectfully refers to its Motion for Party Status filed on July 20, 2026. SCE is participating in the Sempra GRC to monitor the issues and to be able to submit testimony or briefs, or to participate in hearings, as warranted with respect to any issues raised by intervenors that may impact SCE.

R. CAC

Climate Action Campaign (“CAC”) is represented by ClientEarth USA attorneys Setareh Homayoni, Kathleen Konopka, and Benjamin Segal. CAC’s primary party representative for the PHC is Setareh Homayoni, (310) 361-7007, shomayoni@clientearth.org. CAC agrees with the preliminary categorization of this proceeding as “ratesetting.” CAC recommends the scope of this proceeding include the following issues: whether decarbonization and electrification adequately factor into SoCalGas’s estimated future demand for natural gas; whether SoCalGas’ depreciation assumptions and approach are reasonable (particularly with regards to negative net salvage and asset retirement obligations); and whether certain expenditures proposed in the Application are just and reasonable in light of these issues.

S. CforAT

Melissa W. Kasnitz, Legal Director, is CforAT’s party representative for the PHC. The email to be used for service in this proceeding is service@c4at.org, and Ms. Kasnitz can also be reached at mkasnitz@c4at.org. The phone number for CforAT is 510-841-3224 x 2019. CforAT agrees with the preliminary categorization of Ratesetting for the proceeding. CforAT believes that our primary issue of concern, specifically whether the Sempra Utilities are appropriately providing just and reasonable funding and prioritization for efforts to ensure that their facilities and services are accessible to customers with disabilities and medical needs, is subsumed in the

more general proposals for the scope of the proceeding; however, it would also be reasonable for this issue to be articulated separately.

T. Indicated Shippers (IS)

The Indicated Shippers are represented by Nora Sheriff, and she will be the party representative for the PHC, (415) 519-1996, nsheriff@buchalter.com. The Indicated Shippers agree with the preliminary categorization of this proceeding as “ratesetting.” As set forth in their protest, the Indicated Shippers recommend that the scope of the proceeding includes the following issues:

1. Whether Sempra Utilities’ proposed revenue requirements, costs, and recovery mechanisms for Test Year 2028 are just and reasonable and should be adopted by the Commission and reflected in rates;
2. Whether Sempra Utilities’ post-test-year ratemaking mechanisms are just and reasonable;
3. Whether Sempra Utilities’ safety and risk management presentation is reasonable; and
4. Whether the various regulatory account proposals are just and reasonable.

In addition, the Indicated Shippers recommend that the scope of the proceeding explicitly excludes consideration of Sempra Utilities’ proposed post-test-year Earnings Sharing Mechanism in this GRC.

IV. CONCLUSION

This concludes the parties’ joint PHC statement.

Respectfully submitted,

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