BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS & ELECTRIC (U 902 M) COMMENTS ON STAFF PROPOSAL AND CLIMATE LEXICON REPORT

Walter C. Waidelich
Attorney for:
SAN DIEGO GAS & ELECTRIC
8326 Century Park Court
San Diego, CA 92123
Telephone: (619) 676-3607
Email: WWaideli@sdge.com

Holly A. Jones
Attorney for:
SOUTHERN CALIFORNIA GAS COMPANY
555 West Fifth Street, GT14E7
Los Angeles, CA 90013
Telephone: (213) 244-2232
Email: HAJones@socalgas.com

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Pursuant to the Assigned Commissioner's Ruling Entering Staff Proposal and Working Group Report into the Record and Requesting Comment (Ruling) dated July 10, 2026, Southern California Gas Company (SoCalGas) and San Diego Gas & Electric (SDG&E) respectfully provide the following responses to the questions presented in the Ruling, as well as some overarching comments relevant to the rulemaking.

I. INTRODUCTION

SoCalGas and SDG&E (the Joint Utilities) appreciate and acknowledge the thoughtful effort of the California Public Utilities Commission's (CPUC or Commission) Energy Division to develop the proposed Guidance on Community Engagement and Adaptive Capacity (Proposal). The Joint Utilities recognize that many of the proposed recommendations reflect stakeholder and Tribal feedback gathered through Energy Division's public workshops, as well as building upon the existing CAVA framework. The Joint Utilities support the overarching objective of improving transparency, enhancing community engagement, and furthering consideration of equity within climate adaptation planning. Specifically, the Joint Utilities agree with the Commission's direction that community engagement and community adaptive capacity should play a meaningful role in adaptation planning. The Joint Utilities also agree that communities should understand how their participation may inform utility planning and how that information may benefit communities most vulnerable to climate impacts

These objectives are consistent with a core issue identified by communities throughout the CAVA process: the absence of a demonstrable connection between stakeholder and Tribal input and outcomes that are measurable, relevant, and consequential to participating communities. Addressing this concern, however, does not require changes to outreach methods, meeting formats, or reporting requirements; rather, it requires an implementation pathway for translating community input into decision-making and outcomes that recognizes the need for continued flexibility. Given that the current guidelines to equity, community engagement, and metrics span multiple proceedings and thereby risk becoming disjointed, there is a real risk across Commission proceedings that decision requirements become ineffective or contradictory. To promote consistency, avoid duplicative efforts, and support efficient implementation, the Joint Utilities encourage the Commission to provide guidance regarding cross-proceeding integration, alignment, and implementation.

This step should be taken prior to updating specific engagement and community adaptive capacity requirements. The following sections outline both overarching comments and feedback on the specifics of engagement and metric proposed requirements.

II. COMMENTS REQUESTED

A. STAFF PROPOSAL: COMMUNITY ENGAGEMENT FRAMEWORK

1. Please provide feedback on Energy Division's recommendations on Community Engagement and the proposed Community Engagement Framework.

The Energy Division's Proposal calls for increased integration of community engagement outcomes and adaptive capacity considerations into existing planning frameworks, including the Risk Assessment and Mitigation Phase (RAMP) and General Rate Case (GRC). While the Joint

Utilities support this objective, it is important to also consider the multitude of factors that go into the selection of risk mitigations and investment decisions.

The RAMP is designed to identify, assess, and prioritize utility risks, operational challenges, and safety concerns using a highly prescriptive, analytical, and evidence-based framework. The Joint Utilities' RAMP Application itself does not request funding; rather, it establishes the risk-based justification and supporting record that inform future investment proposals. The GRC subsequently translates these identified risks and mitigation needs into specific funding requests, where proposed investments are evaluated and justified through detailed operational, financial, and evidentiary analyses.

Further, utility investment decisions are informed through risk-based and cost-benefit evaluation frameworks that rely on quantitative and dynamic data sources to estimate safety, reliability, and financial benefits as well as long-term economic cost to evaluate alternative mitigation strategies and identify investments that maximize overall customer and societal benefits while making efficient use of limited ratepayer resources. Community engagement can provide valuable and largely qualitative insights into local priorities, lived experiences, and resilience concerns. However, engagement feedback is not readily integrated with the types of data currently used to support investment prioritization and funding requests. Investments like asset replacements, upgrades, inspections, and other infrastructure programs are developed through technical engineering, safety, reliability, and risk-informed analyses. Additionally, investments are often proposed at a programmatic level and may not be tied to specific geographic locations when funding decisions are made. Consequently, the pathways through which stakeholder input could directly influence individual infrastructure investments are not apparent under existing RDF frameworks.

The Joint Utilities further note that community engagement may be more appropriate in some contexts than in others. For example, stakeholder input can provide substantial value in validating vulnerability and adaptive capacity assessments, informing customer-facing programs, and identifying local resilience priorities. Project-level investments, such as microgrids, pipeline hardening and other localized resilience solutions, may provide opportunities for meaningful community participation as timeframe, spatial extent, and influenceability are directly relevant at the community and customer level. Community engagement may also help inform broader policy discussions regarding equity and resilience objectives, enabling utilities and stakeholders to align community-informed priorities that can subsequently guide utility planning across multiple proceedings where appropriate, rather than addressing similar issues through separate engagement efforts.

However, if the Commission intends for engagement feedback to more clearly be tied to investment decisions, additional Commission direction is required to establish a transparent and consistent methodology for incorporating and weighting such feedback within existing regulatory, analytical, and funding frameworks. Without this clarification, the Proposal introduces uncertainty to the IOUs ability to comply with all of its regulatory expectations. For example, the Proposal requests that IOU's "document how adaptive capacity outputs are demonstrated within existing planning and investment processes, including RAMP, GRC…".[1] The Joint Utilities suggest that this language be revised to focus on the IOU's CAVA, which informs its RAMP and GRC. This approach would allow for continued early consideration of community feedback, where it is more likely to be impactful, rather than adding procedural

[1] Proposal at 36-37 (Section 1C. Investment Decision Interpretability).

requirements to IOU investment decisions, which are best considered in other proceedings like the GRC.

The Joint Utilities generally support the Proposal's Community Engagement Framework (CEF) and agree that meaningful engagement with disadvantaged and vulnerable communities (DVCs) can improve transparency in the CAVA process. The proposed touch points and greater transparency for how community feedback is considered may provide additional opportunities for stakeholders to better understand the CAVA process and climate adaptation planning efforts. However, the Proposal should reorient its focus to the CAVA process and make clear that IOUs retain needed flexibility in implementation of the Proposal. In addition, the Joint Utilities highlight the following areas of concern:

a. Timeline

The Proposal introduces a four-year engagement process. According to the proposed timeline, the Joint Utilities are currently halfway through the four-year process. Because it is not possible to complete the four-year cycle before the Joint Utilities upcoming May 2028 CAVA filing, the Joint Utilities propose the below modified schedule:

Dates	Events	Alignment w CEF Cycle
Jan 1, 2027	Prepare draft engagement plan template with IOUs (expect to file in May)	Year 2
Q1 2027	(4) Public Touchpoint 1: Scoping (March) Engagement with CBOs, State/Local Govts, Tribes and ED	Year 2
May 15, 2027	File CEF as Tier 2 AL	Year 2
Q3 2027	(4) Public Touchpoint #2: Guiding (Sept) Engagement with CBOs, State/Local Govts, Tribes and ED	Year 3
Feb 15, 2028	(4) Public Touchpoint #3: Refining / 90 Day Workshop	Year 4
May 15, 2028	File CAVA as Tier 2 AL	Year 4
Feb 15, 2029	File Evaluation Report as Tier 2 AL	Year 1

This modified timeline would be accelerated to achieve the May 2028 CAVA filing. For future CAVA filings, the Utilities could utilize the full four-year engagement cycle, starting with the Evaluation Report to be filed February 2029.

b. Advisory Groups

The Joint Utilities understand the desire for the three core touch points to be public meetings and agree that increased transparency and accessibility is important. However, the Joint Utilities understanding of the Proposal is that any additional Tribal or other advisory group meetings beyond the touch points should not be required to be held publicly or recorded, as this could undermine collective trust and safety necessary for the group's productive and honest communication.

Additionally, the Utilities suggest that language recommending IOUs to utilize advisory group members as lead panelists at the touch points be changed to provide more flexibility in the format and role of advisory group participants. The Joint Utilities suggest that language instead reflects that advisory group members should have a lead role where their perspectives and input are elevated and spotlighted.

The Joint Utilities anticipate compensating[2] community-based organizations and Tribes for their participation in the CAVA advisory group process. The Joint Utilities do not anticipate directly compensating state and local governments for coordinating or the general public that may attend the public touch points.

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[2] To date, costs for developing the CAVA and related community engagement for each utility have been recorded to SoCalGas's and SDG&E's respective CAVA memorandum accounts. In the recent June 2026 GRC filing, SoCalGas and SDG&E proposed to close their CAVAMA as of December 31, 2027 and include future costs as part of their forecast. The Commissioner's Ruling was published on July 10, 2026. Should the Proposal be implemented as written, the additional costs to implement the CEF and other activities may warrant keeping the CAVAMA open to continue to track costs that were not known and could therefore not be forecasted at the time of filing the GRC.

c. Tribal Engagement

The Joint Utilities appreciate the increased focus on tribal engagement. Tribes are experts in climate adaption and remain historical and cultural stewards to the land. Their perspective is critical in assessing the impacts of climate change and proposing adaptation measures to reduce vulnerabilities and to promote innovative solutions based on Traditional Ecological Knowledge.

Tribal Nations are distinct political entities, many with limited resources to engage in regular meetings. Tribes participating in the CAVA engagement process had limited opportunities for reciprocity despite this being an important value expressed by all Tribes. Additionally, CAVA engagement is not linked to direct outcomes, *i.e.*, funding for tribal-specific projects. Consequently, the Joint Utilities recommend that the Commission set aside funding for tribes tied to CAVA engagement and follow best practices recommended by the tribes.

The Joint Utilities believe tribal engagement should be focused and tailored to the specific community's preferences. For example, SDG&E received feedback from multiple tribal representatives at the Climate Science Tribal Work Group on best practices to engage with tribal communities. These recommendations included tribal awareness training for SDG&E employees and direct tribal engagement. In the spirit of respect for distinct sovereign Tribal Nations and to minimize engagement fatigue, SDG&E met separately with six different Tribal Nation government representatives. Subsequently, SDG&E followed with a tribal awareness workshop that included a lecture from a local tribal professor and panel of local tribal leaders, which was attended by 262 SDG&E employees and is now an annual offering.

SoCalGas also focused tribal engagement based on feedback from the specific communities. Within SoCalGas's service area, the Pechanga Band of Indians requested that SoCalGas present and meet with their tribal elders, the Silver Feathers, to better understand the historical impacts of climate change. The Yuhaaviatam of San Manual Nation asked SoCalGas to present to their Executive Leadership team first to help SoCalGas synthesize and disseminate information to the rest of the tribe. Finally, the Soboba Band of Luiseno Indians preferred a large, open-house type workshop where all community members were invited to learn about SoCalGas's CAVA program and to share about their lived experiences. In each situation, the Joint Utilities showed flexibility to meet the communities where they are and presented information in a way that was recommended and approved by the respective tribe.

Maintaining this flexibility is critical for effective tribal engagement. Therefore, the Joint Utilities consider the proposed requirement to establish a Tribal Advisory Group to be problematic. A Tribal Advisory Group is too prescriptive and runs counter to individualized and focused tribal engagement best practices shared above. Additionally, unless there are discrete tribal projects or funding tied to tribal-specific outcomes, the Joint Utilities advise against a separate advisory group, which would consume additional tribal resources and time without corresponding direct impact. Ultimately, addressing the root issue as indicated above is the necessary first step to further engage Tribal Nations effectively.

d. Terminology

The Joint Utilities highlight that the term CAVA "risk" is used at various times throughout the Proposal, and notes that "risk" is not determined in the CAVA, as vulnerability and risk are not the same. The Joint Utilities request that the following language be changed for clarity and consistency:

- Pg. 23 "...high risk CAVA ratings" should be changed to ..."high **vulnerability** CAVA scoring"
- Pg. 25 "prioritized portions of infrastructure that are classified in the CAVA as high-risk and low-adaptive capacity within the 10-20-year analytical timeframe" should be changed to "prioritized portions of infrastructure that are classified in

the CAVA as high-**vulnerability** and low-adaptive capacity within the 10-20-year analytical timeframe"

- Pg. 26 "...CAVA-identified risks inform investment priorities..." should be changed to "...CAVA-identified **vulnerabilities** inform investment priorities..." or otherwise changed to reflect the sequence of identifying vulnerability -> risk -> investments.

- Pg. 43 "Identify hotspots at the intersection of risk and vulnerable communities. Such risk should also identify regions of low adaptive capacity/readiness that may inform...". Please clarify what "risk" is in reference to (*i.e.,* climate, infrastructure, asset, etc.). Please change the guideline phrasing accordingly.

The Joint Utilities also note that, while the Proposal seeks to promote consistency through the establishment of a common Climate Lexicon, several investment-related terms are utilized in the Proposal without clear definition. References to "GRC investment proposals", "adaptation investments", "adaptation-related investments", and "investment priorities" make it unclear whether the Proposal is discussing specifically CAVA Investment Proposals[3] or broader utility investments. The Joint Utilities recommend that the Commission reference "CAVA Investment Proposals" and "adaptation-related investments", as these are the specific terms developed through the Climate Lexicon. The Joint Utilities urge the Commission to apply these terms consistently throughout the decision to avoid ambiguity regarding implementation expectations.

The Joint Utilities further note that adaptive capacity metrics and community engagement, although complimentary, should not be treated interchangeably. Adaptive capacity metrics are generally quantitative measures that may eventually be incorporated into analytical frameworks through a clearly defined methodology. In contrast, community engagement can serve broader and different purposes such as the solicitation of stakeholder feedback, validating assumptions, education, and relationship building. While stakeholder input can help shape the

[3] D.24-08-005 at 82 (Conclusion of Law 15).

development and interpretation of adaptive capacity metrics, community engagement itself does not readily translate into the quantitative processes currently used for risk assessment, prioritization, and cost-effectiveness evaluations. The Joint Utilities suggest making this delineation clear in the Proposal recommendations.

e. Coordination across state agencies, local government, and other CPUC proceedings

The Joint Utilities are working to coordinate across Commission proceedings; however, effectiveness of this coordination is restricted by the mismatch between the various proceeding requirements and activities. Alignment at the Commission level, such as through complimentary decision requirements and facilitation of impact journey optimization of proceeding topics, would enable IOUs to better execute the goals of this, and other related proceedings.

f. CEF Evaluations

The Joint Utilities support the changes proposed in the CEF Evaluation criteria, but request that the requirements specify that raw data are to be included in the report to the extent possible unless confidentiality or PPI is threatened.

g. Hotspot Assessments

The Proposal introduces new concepts around "hotspot assessment scenarios" that were not previously mandated. The Joint Utilities seek clarity on what is required and what publicly available data sets are preferred when analyzing "seniors, youth, unsheltered communities, outdoor and agricultural workers, communities with limited English proficiency, and immigrant communities".[4] Are these hotspot assessments required for the entire service territory or the defined DVC communities? Is the goal to identify additional vulnerable communities that are not in DVCs or to identify the most vulnerable within DVCs?

[4] Proposal at 29.

B. Staff Proposal: Community Adaptive Capacity Metrics

1. Please provide feedback on Energy Division's recommendations on Community Adaptive Capacity Metrics.

The Joint Utilities appreciate Energy Division's effort to establish a common framework and criteria for evaluating community adaptive capacity and alignment with data management best practices. However, the Joint Utilities have concerns that the Proposal seeks to integrate adaptive capacity metrics into existing planning and investment frameworks, including RAMP and GRC processes, without sufficient consideration for how those frameworks currently operate or how such metrics would be incorporated consistently across related Commission proceedings. The following non-exhaustive considerations would likely need to be addressed to allow integration:

Incongruence between spatial extent of GRC proposals and analysis requirements for integration of a community adaptive capacity metric currently poses a challenge. The physical location of utility infrastructure does not necessarily correspond to the communities most affected by that infrastructure, particularly where circuits span a large geographic area. Proposed investments made in a GRC do not always have specific locations, such as requests for various asset replacements. Where no specific circuit level or asset location is considered, connecting community level metrics to risk analysis and investment requests introduces complications. This sentiment is detailed and echoed in the Joint Utilities' respective Climate White Papers[5] and the ESJ Pilot Studies.[6] The difference in scale between customer input, infrastructure investments, and program level decision-making presents a challenge. To the extent the Commission intends

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5 R.20-07-013, Climate Pilot White Paper of San Diego Gas & Electric Company Pursuant to D.24-05-064 (May 15, 2026) and Climate Pilot White Paper of Southern California Gas Company Pursuant to D.24-05-064 (May 15, 2026).

6 A.25-05-010, SoCalGas 2025 Risk Assessment Mitigation Phase (RAMP) Application, Appendix 4 (Environmental Social Justice Pilot Study Plan) (May 15, 2025).

for community engagement outcomes to more directly tie to investment prioritization, additional guidance is necessary so that such inputs can be appropriately balanced against established safety, reliability, and affordability considerations. This clarification is particularly important because shifting investments toward areas identified through engagement but not determined to be the highest risk through existing risk assessment processes, may require additional funding and could have implications for rate affordability.

The Commission should also recognize that community adaptive capacity to climate hazards represent only one component of broader equity and resilience considerations. While there is substantial overlap between climate and equity considerations, they are not one singular impact. Fully addressing the admirable intention behind the community engagement and adaptive capacity metric requirements requires a larger and more holistic effort that goes beyond CAVA and the Climate Adaptation OIR.

Most importantly, the Joint Utilities recommend that, in order to integrate adaptive capacity metrics into RAMP and GRC processes, the Commission establish alignment across relevant proceedings. This is particularly important given the related efforts underway in the Risk-Based Decision-Making Framework (RDF) proceeding,[7] including the ESJ Pilot and Climate Pilot initiatives. Staff recommendations and Commission direction regarding those pilot efforts remain pending and address many of the same questions concerning the integration of equity and climate considerations into utility planning, risk assessment, and investment decision-making processes. Beyond the overarching concern around incorporation of community adaptive capacity metrics, the Joint Utilities note additional points of interest. Language around

[7] Rulemaking (R.) 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities (July 16, 2020); *see also* D.25-08-032, Appendix A: Risk-Based Decision-Making Framework (August 29, 2025).

community adaptive capacity, metrics, and equity need to be carefully and consistently referenced. Proposal Section 1C.d. refers to "CAVA equity indicators", but prior statements reference "adaptive capacity outputs/results", and it is unclear whether these terms are meant to be interchangeable.[8] The Joint Utilities also request that community adaptive capacity is consistently specified in the Proposal language so as to avoid confusion with other types included in CAVA, such as infrastructure or utility adaptive capacity.

a. Data Congruency

To the extent that the Joint Utilities plan to use existing community metrics, particularly that of the State's Office of Land Use and Climate Innovation (LCI)'s Vulnerable Communities Platform (VCP), it is not clear how the proposed guidelines reconcile with this approach. For example, the VCP is a state metric that IOUs are unable to alter based on community feedback, making it challenging to comply with 1b proposed requirements. Further, transparency and data resolution criteria would be met only to the extent the state has provided that information in public methodology documentation, potentially making some of the proposed requirements outside of the utility's ability to comply. Nevertheless, the Joint Utilities emphasize that the ability for communities to identify their own adaptive capacity and to validate any chosen metric should be the basis for any adaptive capacity metric utilized by the utility.

b. Alignment with the State's Envisioned General Plan Process

As the Proposal is written, it places utilities in the role of deciding how to measure community adaptive capacity. Communities themselves should decide what constitutes their adaptative capacity and not utility companies. This evaluation is most appropriately performed as part of the State's envisioned general plan process.

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8 Proposal at 37.

As described by the State's LCI, "A general plan is each local government's blueprint for meeting the community's long-term vision for the future."[9] The general plan is required to include seven elements, one of which is the Safety Element.[10] The goal of the Safety Element is to "reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards."[11] The Safety Element must include "a vulnerability assessment that identifies the risks that climate change poses to the local jurisdiction and the geographic areas at risk from climate change impacts."[12] Through the local agency's Safety Element and, in turn, vulnerability assessment process, a community may assess essential infrastructure, such as natural gas, and incorporate this information into its evaluation of adaptative capacity. Certain metrics could be developed to be integrated by a local agency into the Safety Element of its general plan.

Since 2018, SoCalGas has been working to increase local government capacity through its Climate Adaptation & Resiliency Planning grant program. SoCalGas has awarded 19 municipalities with shareholder-funded $50,000 planning grants focused on helping cities and counties incorporate climate change impacts into their general plan process. This process was effective as the local government took the lead to holistically evaluate the vulnerabilities and community adaptive capacity while the utility provided capacity resources and data related to the energy systems. This collaboration has highlighted the essential role of local governments in the

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9 State of California – LCI, *General Plan Information*, *available at:* https://lci.ca.gov/planning/general-plan/.

10 The mandatory elements of a general plan include Land Use, Circulation, Housing, Conservation, Open Space, Noise, Safety. *See* Gov't Code § 65302.

11 Resilient CA, *General Plan Safety Elements*, *available at:* https://resilientca.org/plans/general-plan-safety-elements/.

12 Gov't Code § 65302(g)(4)(A)(i).

broader vulnerability assessment process. Cities and counties are better equipped at developing adaptive capacity metrics that can be tracked through general plan processes.

Through strong community relationships led by Regional Public Affairs managers, the Joint Utilities are engaged in community general plan processes and can support the efforts of local communities to assess their adaptive capacity and address climate change impacts.

C. Climate Lexicon Report

1. Please provide feedback on the Climate Lexicon Working Group Report.

The Joint Utilities have no further input on the Climate Lexicon Working Group Report (Lexicon Report). As noted therein, the Joint IOUs[13] convened a Working Group to collaborate for several months and solicited input on key terms and proposed definitions from the public through a virtual workshop held on July 10, 2025. Approximately 40 participants attended the public workshop and three parties submitted written comments. Several additional terms were incorporated at the recommendation of the commenting parties or otherwise addressed by the Joint IOUs as described in the Lexicon Report.

2. Should the Commission adopt the recommended definitions, either in total or in part? If proposing changes to definitions, please provide redline edits showing proposed changes.

Yes, the Commission should adopt the recommended definitions in the Lexicon Report in total. The Lexicon Report represents a collaborative effort of the Joint IOUs and the public and captures the relevant definitions and terms for climate change adaptation.

[13] "Joint IOUs" refers to SoCalGas, SDG&E, Pacific Gas & Electric Company (PG&E), and Southern California Edison (SCE).

3. Please comment on whether the Commission should create a mechanism to update the Climate Lexicon, as needed. If so, please provide a description of the mechanism (e.g., staff-initiated resolution, Tier 3 advice letter process, etc.) and any information necessary to assess the proposed mechanism.

The Commission does not typically amend its regulations or definitions in response to incremental changes in engineering, environmental, or other terminology. As such, the justification for establishing a mechanism to update the Climate Lexicon warrants careful consideration. If necessary, the Commission should consider updates to the Climate Lexicon periodically through a staff-initiated resolution.

III. CONCLUSION

The Joint Utilities appreciate the Commission's consideration of these comments.

Respectfully submitted,

By: *<u>/s/ Walter C. Waidelich</u>*
Walter C. Waidelich
8326 Century Park Court
San Diego, CA 92123
Telephone: (619) 676-3607
Email: WWaideli@sdge.com
Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

By: *<u>/s/ Holly A. Jones</u>*
Holly A. Jones
555 West Fifth Street, GT14E7
Los Angeles, CA 90013
Telephone: (213) 244-2232
Email: HAJones@socalgas.com
Attorney for:
SOUTHERN CALIFORNIA GAS COMPANY

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