BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO ESTABLISH A MEMORANDUM ACCOUNT FOR THE OLYMPIC GAMES.	Application 26-07-014

PROTEST OF THE PUBLIC ADVOCATES OFFICE TO THE APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY

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I. INTRODUCTION

The Public Advocates Office (Cal Advocates) at the California Public Utilities Commission (Commission) files this protest pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules). This protest responds to the *Application of Southern California Gas Company (U 904-G) for Authority to Establish a Memorandum Account for the Olympic Games* (Application), filed on July 27, 2026.

In its Application, Southern California Gas Company (SoCalGas) seeks authorization to establish the Los Angeles 2028 Olympics Games Memorandum Account (Memo Account, OGMA) to track costs related to preparing for, operating during, and activities directly after the Los Angeles 2028 Olympic and Paralympic Summer Games (2028 Games or Games).[1] SoCalGas estimates that such costs will amount to approximately $8.2 million.[2]

Cal Advocates has a statutory obligation to represent and advocate on behalf of the interests of public utility customers before the Commission.[3] Cal Advocates' mission is to obtain the lowest possible rate for service consistent with reliable and safe service levels and the state's environmental goals.[4] Cal Advocates therefore has an interest in this proceeding because the recovery requested in the Application will impact utility customers that Cal Advocates represents.[5]

II. DISCUSSION

This Application is the latest of several applications by SoCalGas and San Diego Gas & Electric Company (SDG&E) (collectively, Sempra) that inappropriately seek to bypass the General Rate Case (GRC) process and fragment cost recovery.[6] The

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[1] Application at 1.

[2] Application at 1.

[3] Pub. Util. Code, § 451.

[4] Pub. Util. Code, § 309.5.

[5] Pub. Util. Code, § 309.5.

[6] *See e.g.* A.25-12-012, A.25-12-019, A.26-05-002.

Application provides, at best, only cursory support for its request. SoCalGas fails to demonstrate that a memorandum account is appropriate, rather than including the expenses in its Test Year 2028 GRC[7] (TY 2028 GRC).

As discussed in greater detail in Cal Advocates' concurrently filed motion to consolidate, the Commission should instead consolidate Sempra's TY 2028 GRC with this proceeding. While the Application asserts that a memorandum account is appropriate for the costs at issue, SoCalGas's statements in support of this proposition are conclusory and unsupported.[8]

There is no compelling reason why the requested expenses should be tracked in a memorandum account rather than the GRC. Nor does any Commission requirement mandate that this proceeding be separate from the GRC. GRCs are the primary budgeting process for a utility to safely operate and maintain its system and achieve the appropriate service levels.[9] The greater scrutiny and accountability that the GRC process provides makes it the superior avenue for addressing the expenses identified in the Application. These expenses are all related to SoCalGas's core functions as a utility and properly belong in a GRC. Efficiency and consistency are better served by including these costs in the GRC so the Commission can evaluate them in the context of SoCalGas's overall authorized revenue requirement. Further, given that no scoping ruling for this proceeding has been issued yet, consolidation should not cause any delays.

III. CATEGORIZATION, NEED FOR HEARINGS AND SCHEDULE (Rule 2.6(d))

Cal Advocates agrees that the Application should be categorized as ratesetting. At this stage of the proceeding, it is premature to determine whether evidentiary hearings

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[7] Application (A.) 26-06-014.

[8] Application at 13 – 17.

[9] *See* Understanding How the CPUC Processes a General Rate Case, July 29, 2025, which states that the GRCs are among the most important proceedings that the Commission undertakes, while emphasizing the case complexity and commitment to ratepayer protections.

will be needed. If evidentiary hearings are deemed necessary, they should be scheduled such that parties have sufficient time for discovery and hearing preparation.

As it relates to the schedule, SoCalGas proposes an expedited schedule where a Commission decision would be issued within five to six months from the time the Application was filed.[10] This proposed schedule is unreasonably compressed, as it does not include dates for testimony. The proposed expedited procedural schedule impedes the Commission's and parties' opportunity to meaningfully evaluate the Application. The scope and magnitude of SoCalGas's request and the nature of the issues implicated require a schedule that provides sufficient opportunity for discovery, analysis, and development of the record. Cal Advocates recommends the following milestone-based procedural schedule:

Event	**SoCalGas Proposal**	**Cal Advocates Proposal**
Application Filing Date	August 5th, 2026	August 5th, 2026
Response/Protests Due	September 4th, 2026	September 4th, 2026
Replies to Response/Protests	Within 10 Days Per Rule 2.6	Within 10 Days Per Rule 2.6
Prehearing Conference	September 2026	To Be Determined
Scoping Memo	October 2026	TBD
Intervenor Testimony	Not applicable	90 Days After Scoping Memo
Concurrent Rebuttal Testimony	N/A	30 Days After Intervenor Testimony
Meet and Confer Per Rule 13.9	N/A	10 Days After Rebuttal Testimony
Evidentiary Hearings (if needed)	N/A	TBD

[10] Application at 19.

Opening Briefs	N/A	45 Days After Evidentiary Hearings or Rebuttal Testimony
Reply Briefs	N/A	30 Days After Opening Briefs
Proposed Decision	November 2026	TBD
Final Decision	December 2026	TBD

IV. CONCLUSION

The piecemeal approach requested by SCE is inappropriate. Only inclusion of the expenses in question in the GRC ensures proper scrutiny and accountability. For the foregoing reasons and those included in Cal Advocates' concurrently filed motion to consolidate, Cal Advocates respectfully requests that the Commission grant Cal Advocates' request to consolidate Sempra's TY 2028 GRC with this proceeding.

Respectfully submitted,

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