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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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A2512019

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

Application 25-12-019

**ADMINISTRATIVE LAW JUDGE'S RULING DENYING THE PUBLIC
ADVOCATES' MOTION TO COMPEL AND MOTION TO STRIKE ALL
TESTIMONY BASED ON SOUTHERN CALIFORNIA GAS'S COMPUTER
MODELS**

On December 30, 2025, Southern California Gas Company (SoCalGas/ Applicant) filed the instant application requesting that the Commission authorize a revenue requirement of approximately \$3.76 billion for the Advanced Meter Infrastructure Replacement (AMIR) Project (Application).

On May 29, 2026, the Public Advocates Office at the Commission (Cal Advocates) filed two motions. The first is a Motion to Compel (Motion to Compel) Responses from Southern California Gas Company (SoCalGas) regarding two data requests (DRs) for computer modeling. The second is a Motion to Strike All SoCalGas Testimony Based on Computer Modeling (Motion to Strike). Collectively, the Motion to Compel and Motion to Strike are the (Motions). These Motions stem from discovery responses related to SoCalGas's witnesses prepared testimony served with the Application. The Motions are

addressed together because they address same underlying discovery requests, but simply request alternative relief.

On June 8, 2026, SoCalGas filed a Response to the Motion to Compel (Response to Compel) and Response to the Motion to Strike (Response to Strike). Collectively, the Response to Motion to Compel and Response to Motion to Strike are the (Responses).

On August 3, 2026, a representative for Cal Advocates sent an email to the service list requesting relief to file a Reply. That request to file a Reply is denied.

These Motions stem from two discovery requests Cal Advocates propounded to SoCalGas, referred to as data requests (DR) 9 and 22. These DRs both request SoCalGas provide Cal Advocates a working computer model with calculations and related formulas that SoCalGas used to determine the revenue requirement in this proceeding.¹ In the Motions, Cal Advocates asserts that SoCalGas utilized an internal computer model, referred to as the a Project Evaluation Tool (PET) model, to support its AMIR Project request that cannot be produced or verified by intervenors or Commission Staff. As explained below, Cal Advocates asserts that SoCalGas's refusal or inability to produce the computer model upon which it bases its testimony undermines Cal Advocates rights and is contrary to governing statute and the Commission's Rules of Practice and Procedure (Rules). The Motions also represent that Cal Advocates and SoCalGas exhausted the meet and confer process to attempt to resolve this dispute before filing the Motions.

¹ Motion to Compel at 4.

SoCalGas's Responses represent that Cal Advocates did not exhaust the meet and confer process before filing these Motions. This Ruling finds that the Parties exhausted the meet and confer process.

The Motion's authority to compel production is based on multiple sections of the California Public Utilities Code (Pub. Util. Code) and California Code of Civil Procedure. The most relevant sections are Pub. Util. Code §§309.5(e), 581 and 1822 that provide two separate statutory paths to the requested relief.

Pub. Util. Code §309.5(e) provides Cal Advocates independent statutory authority to propound discovery and compel production of documents. The analysis of the Motions arguments pursuant to Pub. Util. Code §§309.5(e) and 581 are governed under Rule 10.1.

In its Motions, Cal Advocates also argues that it is entitled to working copy of SoCalGas's computer modeling that is the basis of testimony, pursuant to Pub. Util. Code §1822. This section is analyzed pursuant to Rules 10.3 and 10.4. The Motion to Compel represents that SoCalGas's workpapers did not include the data required under Rule 10.3.²

SoCalGas's Responses oppose the Motions on the grounds that there is no authority that SoCalGas must produce a working external copy of revenue requirement model, and that during the meet and confer process SoCalGas provided Cal Advocates alternative access to the computer model as allowed under Rule 10.3. The Responses also represent that the PET model is SoCalGas's standard model for this type of filing.³

² Motion to Compel at 11.

³ Response to Motion to Compel at 4.

The Responses argue that the general language of in Pub. Util. Code §§309.5(e) and 581 do not support the requested relief to produce a working copy of the model in Excel format but rather simply an inspection, which may occur at the location where records and systems are maintained. The Responses argue that the general statutes cited by Cal Advocates are not applicable but rather Pub. Util. Code §1822 is specific to computer modeling should dictate the disposition of the Motions.

Unlike other parties to the proceeding, Cal Advocates has specific statutory rights under Pub. Util. Code §309.5(e) to propound discovery and request information from SoCalGas. Cal Advocates authority under Pub. Util. Code §309.5(e) is not superseded by Pub. Util. Code §1822 because it is a specific request for computer modeling.

However, Pub. Util. Code §§309.5(e), 581 and 1822, as well as Rule 10.3, do not expressly authorize Cal Advocates' requested relief for a working copy of the computer model in Excel format. Rather, these statutes and the Rules provide Cal Advocates the ability to access and verify SoCalGas's computer model and its various outputs and calculations. SoCalGas provided Cal Advocates multiple means of access to the computer model as described in the Responses, including onsite access at a SoCalGas facility, a walkthrough of the model, and running scenarios on behalf of Cal Advocates, including live scenarios.

Furthermore, as noted in Cal Advocates' Motion, the PET model is foundational to a SoCalGas sponsoring witness's testimony that was served with the Application. Cal Advocates may examine the sponsoring witness in evidentiary hearings regarding the computer modeling and, as discussed above, has been provided multiple means of access to the model. Cal Advocates request

to strike all testimony is a draconic remedy. As Cal Advocates and SoCalGas are undoubtedly aware, the assigned ALJ is the fact finder and determines the weight of all evidence in this proceeding in his Proposed Decision including computer modeling and testimony. Alternatively, if a Proposed Alternative Decision is issued then the Commissioners would make these findings in place the assigned ALJ.

As noted above, in its Motion to Compel Cal Advocates also asserts that SoCalGas's responses to Cal Advocates Data Request 9 do not include the information required by Rule 10.3.⁴ In its Response, SoCalGas asserts it has never been asked to provide the Rule 10.3 documentation.⁵ Cal Advocates Data Request 9 includes requests for "an Excel spreadsheet with active cells, sources, formulae, and links" corresponding to SoCalGas's Total Forecasted Direct Costs and Total Costs Loaded and Escalated. Cal Advocates' request is essentially for a working copy of the PET model in Excel format which, as discussed above, is beyond the broader process, documentation, and input and output data information that must be provided as requested and pursuant to Rule 10.3.

Ultimately, Cal Advocates' request for a working copy of SoCalGas' computer model Excel format is not supported by the law or the Commission's Rules. Having reviewed the Motions, there is not good cause to grant the Motions. The Motions are denied.

⁴ Motion to Compel at 10-11 and Appendix-02.

⁵ SoCalGas Response at 8.

IT IS RULED that:

1. The May 29, 2026 motion of the Public Advocates Office to strike all testimony based on Southern California Gas Company's computer model is denied.
2. The May 29, 2026 motion of the Public Advocates Office to compel information related to Southern California Gas Company's Advanced Metering Infrastructure Replacement Project is denied.

Dated: September 30, 2026, at San Francisco, California.

/s/ PATRICK PETERSEN
Patrick Petersen
Administrative Law Judge