

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California
Gas Company (U904G) in Compliance
with Ordering Paragraph 6 of
Decision 24-12-076.

Application 26-01-009

**THE PUBLIC ADVOCATES OFFICE REPLY COMMENTS
ON STAFF PROPOSAL MODIFYING BIENNIAL ASSESSMENT REPORT
INPUTS AND METHODS**

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October 30, 2026

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Application of Southern California
Gas Company (U904G) in Compliance
with Ordering Paragraph 6 of
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ON STAFF PROPOSAL MODIFYING BIENNIAL ASSESSMENT REPORT
INPUTS AND METHODS**

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these reply comments pursuant to the *Administrative Law Judge's Ruling Inviting Comment on Staff Proposal Modifying Biennial Assessment Report Inputs and Methods* (Ruling) issued on October 9, 2026, in the above-captioned proceeding. The Ruling presents a Staff Proposal to modify the inputs and methods of Energy Division's Biennial Assessment report and invites comments on revisions to these inputs and methods.¹ Further, the Ruling states that parties may comment on whether Energy Division should add additional modeling scenarios to future Biennial Assessment reports.²

Parties filed opening comments on October 21, 2026. These reply comments respond to comments by Southern California Gas Company (SoCalGas)³ and Indicated

¹ Administrative Law Judge's Ruling Inviting Comment on Staff Proposal Modifying Biennial Assessment Report Inputs and Methods, October 9, 2026 (Ruling).

² Ruling at 1.

³ *Southern California Gas Company Opening Comments to Administrative Law Judge's Ruling Inviting Comment on Staff Proposal Modifying Biennial Assessment Report Inputs and Methods*, October 21, 2026 (SoCalGas Opening Comment).

Shippers.⁴ To ensure that the next Biennial Assessment and future applications provide information consistent with the most current conditions and reasonably expected future conditions, the Commission should:

- Adopt the Indicated Shippers proposal to conduct “a 2028 assessment using corrected inputs” rather than “a 2027 assessment that repeats the 2025 inputs.”⁵
- Reject the SoCalGas proposal to adopt a five-year assessment cycle.

II. COMMENTS

A. **SoCalGas’ TY 2028 GRC includes projects to restore production capacity at its storage fields, which should be included in Biennial Assessments**

The Commission should use corrected inputs that capture relevant information from SoCalGas’ 2028 General Rate Case (GRC).⁶ For the next Biennial Assessment Report, corrected inputs will provide the Commission with information that is consistent with the most current conditions and reasonably expected future conditions. Also, consistent information will likely protect ratepayers from paying for unreasonable costs or costs that may not materialize.

1. **The Commission should adopt Indicated Shippers’ proposal to delay the Biennial Assessment by one year.**

SoCalGas filed its 2028 GRC between filing this application and its next Biennial Assessment.⁷ In Capital Workpapers for its GRC, SCG Chapter 5 – Gas Transmission and Storage, SoCalGas presents several new infrastructure projects purportedly to restore production capacity at its gas storage fields. This includes bringing into service Honor

⁴ *Indicated Shippers Opening Comments on ALJ’s Ruling Inviting Comment on Staff Proposal Modifying Biennial Assessment Report Inputs and Methods*, October 21, 2026 (IS Opening Comment).

⁵ IS Opening Comment at 17-18.

⁶ Application (A.) 26-06-014, *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* (SoCalGas TY 2028 GRC).

⁷ *Application of Southern California Gas Company (U904g) In Compliance With Ordering Paragraph 6 of Decision 24-12-076* (Application).

Rancho wells WEZU 24D, 24E, 24F, 24G, 24H, and 25D in 2026;⁸ drilling six new wells at La Goleta (planned for 2026);⁹ and drilling six new wells at Playa del Rey no earlier than 2028.¹⁰ New infrastructure projects that increase “the gas system’s reliance on Honor Rancho” over the next several years are also discussed in the first Biennial Assessment as having an impact on future assessments.¹¹ In order to capture data on the new Honor Rancho wells put into service, as well as any other new infrastructure projects at the storage fields, the Commission should adopt Indicated Shippers’ proposal to delay the Biennial Assessment by one year.¹²

2. The Commission should deny SoCalGas’ proposal to replace the current Biennial Assessment schedule with a five-year assessment cycle.¹³

The Commission should also deny SoCalGas’ proposal to increase the assessment cycle to five years. SoCalGas’ significant amount of new and proposed wells at other fields in the next few years, and these wells’ impact on production, will likely affect inventory needs at Aliso Canyon within the next five years. SoCalGas argues that a longer five-year cycle is necessary because “[a] biennial cycle is unlikely to produce meaningfully different results between successive studies because underlying supply, demand, and infrastructure conditions simply do not change that quickly.”¹⁴ SoCalGas’s argument is meritless because it fails to factor in the work proposed in the TY 2028 SoCalGas GRC, which will result in a substantial change in infrastructure conditions over the next few years. Further, there is already a meaningful positive change in

⁸ Attachment B, SoCalGas TY 2028 GRC, Data Request PubAdv-SCG-037-MTD, SoCalGas Response 1.b-c at 2-3.

⁹ SoCalGas TY 2028 GRC, Exhibit No. SCG-05-CWP.1, Table 3: Sub Forecast for: WP 004030 - GS Pipelines – Goleta at 206.

¹⁰ Attachment A, SoCalGas TY 2028 GRC, Data Request PubAdv-SCG-0021-MTD, SoCalGas Response 4.b at 18.

¹¹ Decision (D.) 24-12-076, *Decision Adopting Biennial Assessment Process*, 2025 Aliso Canyon Biennial Assessment Report at 20.

¹² IS Opening Comment at 17-18.

¹³ SoCalGas Opening Comment at 6.

¹⁴ SoCalGas Opening Comment at 6.

infrastructure conditions at Honor Rancho this year.

Therefore, the Commission should not wait five years to model the recent and planned positive impacts on production capacity, reliability, and operational flexibility of non-Aliso Canyon gas storage fields from the new and proposed gas storage wells.

B. SoCalGas' TY 2028 GRC confirms production capacity from its other storage fields had been impacted at the time of the 2025 Biennial Assessment

SCG-5 Capital Workpapers, WP #4030 make the following statements regarding the storage fields gathered in **Table 1**, below:

Table 1 – SoCalGas WP 004030 - GS Pipelines¹⁵

TABLE #	WP QUOTE
Table 3- Goleta Projects	“The added infrastructure for the new wells will restore the field's maximum production capacity, improving reliability, redundancy, and operational flexibility.”
Table 4- Honor Rancho Projects	“This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility.”
Table 5- Playa del Rey Projects	“This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility.”

Cal Advocates asked SoCalGas the following question in a data request about the Goleta Projects: “What has impacted the field's maximum production capacity? And how long has the impact existed?” In response, SoCalGas stated:

The field’s maximum production capacity, also referred to as injection and withdrawal capacity or deliverability, has been impacted by the storage wells that were abandoned due to the Storage Integrity Management Program (SIMP) inspections. As the number of available storage wells decreases, injection

¹⁵ SoCalGas TY 2028 GRC, Exhibit No. SCG-05-CWP.1, Table 3: Sub Forecast for: WP 004030 - GS Pipelines – Goleta, Table 4: Sub Forecast for: WP 004030 - GS Pipelines - Honor Rancho, and Table 5: Sub Forecast for: WP 004030 - GS Pipelines - Playa del Rey at 206-207.

and withdrawal capacity also decreases. This impact began with the well abandonments following the SIMP inspection results that started in 2016.¹⁶

SoCalGas responded similarly to questions regarding Honor Rancho and Playa del Rey.¹⁷ Future Biennial Assessments should take into account each field's current maximum production capacity, particularly since SoCalGas plans to drill and put new wells into service such as it recently did at the Honor Rancho Gas Storage Facility.^{18, 19} As the 2025 Aliso Canyon Biennial Assessment Report noted, the storage utilization factor used in the assessment will yield different results as the other storage fields' withdrawal capacity changes.²⁰

III. CONCLUSION

Cal Advocates appreciates the opportunity to provide reply comments in response to the Ruling. Given the impacts of well abandonments on reliability at all fields since 2016 and plans for new well infrastructure at all fields, both of which are identified in the TY 2028 SoCalGas GRC, the Commission should:

- Adopt the Indicated Shippers proposal to conduct “a 2028 assessment using corrected inputs”²¹ rather than “a 2027 assessment that repeats the 2025 inputs”²²

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¹⁶ Attachment A, SoCalGas TY 2028 GRC, Data Request PubAdv-SCG-0021-MTD, SoCalGas Response 2.a.i. at 4.

¹⁷ Attachment A, SoCalGas TY 2028 GRC, Data Request PubAdv-SCG-0021-MTD, SoCalGas Response 3.e.i. at 14 and 4.d.i at 20.

¹⁸ “SoCalGas plans to drill additional wells at Honor Rancho by 2030, which will increase the field's withdrawal capacity...” D.24-12-076, *Decision Adopting Biennial Assessment Process*, 2025 Aliso Canyon Biennial Assessment Report at 19.

¹⁹ Attachment B, SoCalGas TY 2028 GRC, Data Request PubAdv-SCG-037-MTD, SoCalGas Response 1.b-c at 2-3.

²⁰ D.24-12-076, *Decision Adopting Biennial Assessment Process*, 2025 Aliso Canyon Biennial Assessment Report at 10.

²¹ IS Opening Comment at 17.

²² IS Opening Comment at 17-18.

- Reject the SoCalGas proposal to adopt a five-year assessment cycle

Respectfully submitted,

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October 30, 2026

ATTACHMENT A
SoCalGas Response to Cal Advocates Data Request Number
PubAdv-SCG-0021-MTD

Data Request Number: PubAdv-SCG-0021-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

Publish To: Public Advocates Office

Date Received: 08/21/26

Date Responded: 09/04/26

1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 2, Aliso Canyon Projects. Please provide the following information

a. Have permits been filed yet with the California Geologic Energy Management (CalGEM) Division for the "eight new gas storage wells"?

SoCalGas Response 1.a:

No. SoCalGas has not yet filed Notice of Intentions (NOIs) with CalGEM for these wells. NOIs must be submitted to CalGEM before permits are issued and are typically filed six to nine months before the spud date for injection and withdrawal wells.

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Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

Publish To: Public Advocates Office

Date Received: 08/21/26

Date Responded: 09/04/26

1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 2, Aliso Canyon Projects. Please provide the following information

b. Have the "eight new gas storage wells" been drilled yet? If yes, provide the well spud date (date when drill bit enters the ground) and completion date for each. If no, provide the expected spud date.

SoCalGas Response 1.b:

No. The expected spud date is no earlier than 2029.

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Publish To: Public Advocates Office

Date Received: 08/21/26

Date Responded: 09/04/26

1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 2, Aliso Canyon Projects. Please provide the following information

c. When does SCG intend to "install laterals and associated surface facilities" for the "eight new gas storage wells"? If no specific date is available, would the installation be before the planned spud dates of the wells?

SoCalGas Response 1.c:

SoCalGas plans to begin constructing and installing laterals and associated surface facilities for the new wells no earlier than late 2030.

A specific installation date is not available because project timing depends on the completion of engineering, material procurement, and the drilling schedule for the wells. Construction and installation of laterals and associated surface facilities are planned to occur after the wells have been drilled and completed (i.e., after, not before, the planned spud dates).

Data Request Number: PubAdv-SCG-0021-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

Publish To: Public Advocates Office

Date Received: 08/21/26

Date Responded: 09/04/26

2. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 3, Goleta Projects. Please provide the following information

a. Regarding the statement "The added infrastructure for the new wells will restore the field's maximum production capacity, improving reliability, redundancy, and operational flexibility".

i. What has impacted the field's maximum production capacity? And how long has the impact existed?

SoCalGas Response 2.a.i:

The field's maximum production capacity, also referred to as injection and withdrawal capacity or deliverability, has been impacted by the storage wells that were abandoned due to the Storage Integrity Management Program (SIMP) inspections. As the number of available storage wells decreases, injection and withdrawal capacity also decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

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2. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 3, Goleta Projects. Please provide the following information

a. Regarding the statement "The added infrastructure for the new wells will restore the field's maximum production capacity, improving reliability, redundancy, and operational flexibility".

ii. What has impacted reliability? And how long has the impact existed?

SoCalGas Response 2.a.ii:

SIMP well abandonments have reduced the number of available storage wells, impacting reliability, redundancy, and operational flexibility. With fewer wells available to support field operations, outages or maintenance activities on individual wells have a greater impact on field deliverability and performance. Reliability decreases because fewer operational wells are available to support field operations, increasing the burden on the remaining wells. Redundancy and operational flexibility also decrease as the number of operational wells decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

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2. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 3, Goleta Projects. Please provide the following information

a. Regarding the statement "The added infrastructure for the new wells will restore the field's maximum production capacity, improving reliability, redundancy, and operational flexibility".

iii. What has impacted redundancy? And how long has the impact existed?

SoCalGas Response 2.a.iii:

See Response 2.a.ii.

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2. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 3, Goleta Projects. Please provide the following information

a. Regarding the statement "The added infrastructure for the new wells will restore the field's maximum production capacity, improving reliability, redundancy, and operational flexibility".

iv. What has impacted operational flexibility? And how long has the impact existed?

SoCalGas Response 2.a.iv:

See Response 2.a.ii.

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2. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 3, Goleta Projects. Please provide the following information

b. When does SCG intend to began and complete the project "Laterals for 6 New Wells". If no specific date available, would the installation be before the planned spud dates of "the six (6) wells scheduled for drilling in 2026 at the Goleta Storage Field"?

SoCalGas Response 2.b:

SoCalGas plans to begin constructing and installing laterals and associated surface facilities for the new wells no earlier than late 2027.

A specific installation date is not available because project timing depends on the completion of engineering, material procurement, and the drilling schedule for the wells. Construction and installation of laterals and associated surface facilities are planned to occur after the wells have been drilled and completed (i.e., after, not before, the planned spud dates).

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Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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Date Responded: 09/04/26

3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

a. The spud date and the completion date of each of the "WEZU 24 D,E,F,G,H Wells"

SoCalGas Response 3.a:

WEZU 24D (API 0403730582)

- Spud Date: 2/22/2022
- Completion Date: 4/23/2023

WEZU 24E (API 0403730581)

- Spud Date: 5/10/2022
- Completion Date: 6/08/2023

WEZU 24F (API 0403730580)

- Spud Date: 7/25/2022
- Completion Date: 5/15/2023

WEZU 24G (API 0403730579)

- Spud Date: 10/19/2022
- Completion Date: 7/03/2023

WEZU 24H (API 0403730594)

- Spud Date: 8/03/2023
- Completion Date: 4/18/2024

Data Request Number: PubAdv-SCG-0021-MTD

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Publish To: Public Advocates Office

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Date Responded: 09/04/26

3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

b. Was the "WEZU 24 D,E,F,G,H Wells Surface Facilities Project" requested in the TY2024 GRC, if not, why?

SoCalGas Response 3.b:

Yes. The request is found in Ex. SCG-10-CWP-R, Workpaper Group 004130 – GAS STOR Pipelines, page 42, in [A.22-05-015 - SoCalGas 2024 General Rate Case | SoCalGas](#).

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3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

c. Has any work been completed to date on the "WEZU 24 D,E,F,G,H Wells Surface Facilities Project"? If so, what work, and what amount has been spent as of the TY2028 GRC filing?

SoCalGas Response 3.c:

Yes. Work has been completed on the WEZU 24 D, E, F, G, and H Wells Surface Facilities Project.

As of the TY 2028 GRC filing date of June 15, 2026, completed work on the WEZU 24 D, E, F, G, and H Wells Surface Facilities Project included engineering and design; material procurement; underground tie-in connections to existing gas infrastructure; installation of concrete foundations, pipe supports, separators, and associated foundations; installation of programmable logic controllers (PLCs) and enclosures; substantial piping fabrication and installation; and substantial painting and coating activities. In addition, electrical and instrumentation installation and the installation of cable trays and electrical and instrumentation conduits had commenced.

As of December 31, 2025, SoCalGas had incurred \$28,959,693 in project expenditures related to the WEZU 24 D, E, F, G, and H Wells Surface Facilities Project. Costs incurred after December 31, 2025 are not reflected in this amount because final 2026 recorded expenditures were not available at the time of the TY 2028 GRC filing.

Data Request Number: PubAdv-SCG-0021-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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Date Received: 08/21/26

Date Responded: 09/04/26

3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

d. Has any work as described in Table 4 Honor Rancho Projects been completed yet, if so what work, and what amount has been spent as of the TY2028 GRC filing?

SoCalGas Response 3.d:

Yes. Work has been completed on projects included in “Table 4: Sub Forecast for: WP 004030 – GS Pipelines – Honor Rancho.” Specifically, of the projects identified in Table 4, work has been performed on the following three projects: WEZU 24 D, E, F, G, and H Wells Surface Facilities Project, the HR - WEZU 25D Well Surface Facilities Project, and HR - Field and Plant Valve.

As discussed in Response 3.c. for the WEZU 24 D, E, F, G, and H Wells Surface Facilities Project, completed work as of the TY 2028 GRC filing date of June 15, 2026 included engineering and design; material procurement; underground tie-in connections to existing gas infrastructure; installation of concrete foundations, pipe supports, separators, and associated foundations; installation of programmable logic controllers (PLCs) and enclosures; substantial piping fabrication and installation; and substantial painting and coating activities. In addition, electrical and instrumentation installation and the installation of cable trays and electrical and instrumentation conduits had commenced.

For the HR - WEZU 25D Well Surface Facilities Project, completed work as of the TY 2028 GRC filing date included the engineering and design of the wellsite; procurement of materials; installation of concrete foundations for pipe supports; fabrication and installation of steel pipe supports; fabrication and installation of piping systems; painting and coating of piping and equipment; installation of the programmable logic controller (PLC); partial electrical and instrumentation installation; and the installation of cable trays, electrical conduits, and instrumentation conduits.

For the HR - Field and Plant Valve project, completed work as of the TY 2028 GRC filing date included valve material procurement and associated labor for replacement of valves.

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SoCalGas Response 3.d Continued:

As of December 31, 2025, SoCalGas incurred a total of \$47,138,427 in expenditures for these three projects. The WEZU 24 D, E, F, G, and H Wells Surface Facilities Project incurred \$28,959,693. The HR - WEZU 25D Well Surface Facilities Project incurred \$18,073,068. Lastly, the HR - Field and Plant Valve incurred \$105,664. Costs incurred during 2026 are not reflected in this amount because final 2026 recorded expenditures were not available at the time of the TY 2028 GRC filing.

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Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

e. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility."

i. What has impacted long-term storage field capacity? And how long has the impact existed?

SoCalGas Response 3.e.i:

The long-term storage field capacity, also referred to as injection and withdrawal capacity or deliverability, has been impacted by the storage wells that were abandoned due to the SIMP inspections. As the number of available storage wells decreases, injection and withdrawal capacity also decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

Data Request Number: PubAdv-SCG-0021-MTD

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3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

e. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility."

ii. What has impacted reliability? And how long has the impact existed?

SoCalGas Response 3.e.ii:

SIMP well abandonments have reduced the number of available storage wells, impacting reliability, redundancy, and operational flexibility. With fewer wells available to support field operations, outages or maintenance activities on individual wells have a greater impact on field deliverability and performance. Reliability decreases because fewer operational wells are available to support field operations, increasing the burden on the remaining wells. Operational flexibility also decreases as the number of operational wells decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

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3. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects. Please provide the following information

e. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility."

iii. What has impacted operational flexibility? And how long has the impact existed?

SoCalGas Response 3.e.iii:

See Response 3.e.ii.

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4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

a. Have permits been filed yet with the California Geologic Energy Management Division for the "six new gas storage wells"?

SoCalGas Response 4.a:

No. SoCalGas has not yet filed Notice of Intentions (NOIs) with CalGEM for these wells. NOIs must be submitted to CalGEM before permits are issued and are typically filed six to nine months before the spud date for injection and withdrawal wells.

Data Request Number: PubAdv-SCG-0021-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

Publish To: Public Advocates Office

Date Received: 08/21/26

Date Responded: 09/04/26

4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

b. Have the "six new gas storage wells" been drilled yet? If yes, provide the spud date and completion date for each. If no, provide the expected spud date.

SoCalGas Response 4.b:

No. The expected spud date is no earlier than 2028.

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Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

Publish To: Public Advocates Office

Date Received: 08/21/26

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4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

c. When does SCG intend to began and complete the project "Laterals for 6 New Wells". If no specific date is available, would the installation be before the planned spud of the "six new gas storage wells"?

SoCalGas Response 4.c:

SoCalGas plans to begin constructing and installing laterals and associated surface facilities for the new wells no earlier than 2029.

A specific installation date is not available because project timing depends on the completion of engineering, material procurement, and the drilling schedule for the wells. Construction and installation of laterals and associated surface facilities are planned to occur after the wells have been drilled and completed (i.e., after, not before, the planned spud dates).

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4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

d. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility.

i. What has impacted long-term storage field capacity? And how long has the impact existed?

SoCalGas Response 4.d.i:

The long-term storage field capacity, also referred to as injection and withdrawal capacity or deliverability, has been impacted by the storage wells that were abandoned due to the SIMP inspections. As the number of available storage wells decreases, injection and withdrawal capacity also decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

Data Request Number: PubAdv-SCG-0021-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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Date Received: 08/21/26

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4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

d. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility.

ii. What has impacted reliability? And how long has the impact existed?

SoCalGas Response 4.d.ii:

SIMP well abandonments have reduced the number of available storage wells, impacting reliability, redundancy, and operational flexibility. With fewer wells available to support field operations, outages or maintenance activities on individual wells have a greater impact on field deliverability and performance. Reliability decreases because fewer operational wells are available to support field operations, increasing the burden on the remaining wells. Operational flexibility also decreases as the number of operational wells decreases.

This impact began with the well abandonments following the SIMP inspection results that started in 2016.

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4. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 5, Playa del Rey Projects. Please provide the following information

d. Regarding the statement "This project is essential for placing the new wells into service and restoring long-term storage field capacity, reliability, and operational flexibility.

iii. What has impacted operational flexibility? And how long has the impact existed?

SoCalGas Response 4.d.iii:

See Response 4.d.ii.

ATTACHMENT B
SoCalGas Response to Cal Advocates Data Request Number
PubAdv-SCG-037-MTD

Data Request Number: PubAdv-SCG-037-MTD

Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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Date Received: 09/21/26

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1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects, please provide the following information:

a. The spud date and the completion date of WEZU 25D Well

SoCalGas Response 1.a:

WEZU 25D (API 0403730595):

- **Spud Date:** 12/27/2023
- **Completion Date:** 10/25/2024

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1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects, please provide the following information:

b. What is the estimated in-service date for project WEZU 24 D,E,F,G,H Wells Surface Facilities?

SoCalGas Response 1.b:

The in-service date for project WEZU 24 D, E, F, G & H Well Surface Facilities was September 14, 2026.

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1. Referring to SCG-5-Capital Workpapers, WP #4030, Workpaper - GS Pipelines, Table 4, Honor Rancho Projects, please provide the following information:

c. What is the estimated in-service date for WEZU 25D Well Surface Facilities?

SoCalGas Response 1.c:

The estimated in-service date for WEZU 25D Well Surface Facilities is November 30, 2026.

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2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

a. Please list all activities associated with C401 SIMP.

SoCalGas Response 2.a:

C401 encompasses the SIMP activities, which are organized into two distinct, non-duplicative categories: (1) SIMP programmatic activities, and (2) SIMP execution activities. These activities are included in two separate testimonies as described below:

- **SIMP Programmatic Activities:** These activities include the development, administration, implementation, oversight, and continuous improvement of the SIMP, including activities necessary to support risk identification, risk evaluation, risk treatment planning, regulatory compliance, and program governance. SIMP programmatic activities are managed by SoCalGas's Gas Engineering and System Integrity (GESI) organization and are described in the GESI Testimony Ex. SCG-03, Sections V.C. and XII.C.
- **SIMP Execution Activities:** These activities encompass the execution of SIMP-related projects and field activities necessary to assess and mitigate storage integrity risks and are divided into three categories: integrity assessments, remediations, and abandonments. These activities are managed by the Gas Transmission & Storage (GT&S) organization and are described in the GT&S Testimony Ex. SCG-05, Section V.P.1. The cost forecast breakdown for these activities is provided in Ex. SCG-05-CWP, page 281.

Ex. SCG-05, page 163, Table GO-60, contains only the forecasts associated with GT&S SIMP execution activities for the period 2028 to 2031.

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2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

b. For each activity listed in part a, provide the number of full-time employees (FTEs) required.

SoCalGas Response 2.b:

SoCalGas objects to this request on the grounds that it is vague and ambiguous. SoCalGas interprets this question as requesting the Full-Time Equivalents (FTEs) associated with the activities identified in SoCalGas Response 2.a that are reflected in Ex. SCG-05, page 163, Table GO-60. As discussed in SoCalGas Response 2.a, C401 encompasses both SIMP programmatic activities and SIMP execution activities; however, Table GO-60 contains only the forecast associated with GT&S SIMP execution activities. SoCalGas further interprets FTE, consistent with the TY 2028 GRC Application, Appendix J, page J-1, as a calculation of labor based on hours worked, used to standardize staffing and activity levels, rather than a count of employees. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Ex. SCG-05-CWP, page 281, provides the forecast breakdown for the SIMP execution capital activities for integrity assessments, remediations, and abandonments, including associated FTEs.

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Date Responded: 10/5/26

2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

c. Which group or organization at SoCalGas is responsible for C401 SIMP?

SoCalGas Response 2.c:

See Response 2.a.

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Proceeding Name: A2606014_015 2028 GRC SoCalGas and SDGE

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Date Responded: 10/5/26

2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

d. Please list all activities associated with C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices.

SoCalGas Response 2.d:

Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices encompasses capital activities associated with well abandonment, replacement, and workovers that support underground gas storage well integrity and ongoing monitoring and verification practices. The activities contained in C402 are described in Ex. SCG-05, Section V.L.1. Ex. SCG-05-CWP, page 266, provides the forecast breakdown for these activities.

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2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

e. For each activity listed in part d, provide the number of FTEs required.

SoCalGas Response 2.e:

SoCalGas objects to this request on the grounds that it is vague and ambiguous. SoCalGas interprets this question as requesting the Full-Time Equivalents (FTEs) associated with the activities identified in SoCalGas Response 2.d that are reflected in Exhibit SCG-5, page 146, Table GO-54. SoCalGas interprets FTE's, consistent with the TY 2028 GRC Application, Appendix J, page J-1, as a calculation of labor based on hours worked, used to standardize staffing and activity levels, rather than a count of employees. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

As discussed in Response 2.d, Ex. SCG-05-CWP, page 266, provides the forecast breakdown and FTEs associated with mitigation C402.

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2. Referring to Exhibit SCG-5, page 163, Table GO-60, Mitigation C401 Storage Integrity Management Program (SIMP), and Exhibit SCG-5, page 146, Table GO-54, Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices, please provide the following information:

f. Which group or organization at SoCalGas is responsible for C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices?

SoCalGas Response 2.f:

GT&S is responsible for C402 Well Abandonment Replacement Demo Verification and Monitoring Practices. Mitigation C402 Well Abandonment/Replacement/Demo Verification and Monitoring Practices encompasses capital activities associated with well abandonment, replacement, and workovers that support underground gas storage well integrity and ongoing monitoring and verification practices. The activities contained in C402 are described in Ex. SCG-05, Section V.L.1. Ex. SCG-05-CWP, page 266, provides the forecast breakdown for these activities.