BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Delia Lovell, Complainant, vs. Southern California Gas Company (U 904 G), Defendant.	Case 26-06-024 (Filed June 23, 2026)

COMPLAINANT DELIA LOVELL'S MOTION TO COMPEL PRODUCTION OF METER READS, BILLS, AND ACCOUNT RECORDS SUBSTANTIATING THE BALANCE DEMANDED; [PROPOSED] RULING

I. INTRODUCTION

Pursuant to Rules 10.1, 11.1, and 11.3 of the Commission's Rules of Practice and Procedure, Complainant Delia Lovell moves for an order compelling Southern California Gas Company (SoCalGas) to produce two categories of records: (1) the meter reads, charges, and bills for every billing period that makes up any part of the balance SoCalGas demands on Account No. 03652217062, from the first such charge to the last; and (2) every name, account number, and service and billing address SoCalGas has billed in the name of Delia Lovell or for service at 325 Emerald Drive, Lake Arrowhead.

SoCalGas's ledger shows a balance of $5,585.27 as of July 15, 2026. SoCalGas has produced substantial material, and Complainant acknowledges that effort. But the production does not allow SoCalGas, Complainant, or the Commission to trace that balance to meter reads and bills. A balance that cannot be traced should not be collected, should not be transferred into another Arrearage Management Plan (AMP) enrollment, and should be either substantiated or removed.

II. BACKGROUND

A. The Balance in Dispute

SoCalGas disconnected service at the residence on March 12, 2026, when its ledger showed a balance of $5,471.73. Complainant had paid the full current bill of $181.55 on March 4, 2026. SoCalGas's ledger records 27 payments totaling $4,270.27 between September 7, 2021 and March 4, 2026. The balance demanded rests in large part on charges that SoCalGas twice moved into AMP and then returned to the account: $2,337.93 on September 2, 2022 and $4,412.84 on May 2, 2025.

B. Discovery and SoCalGas's Production

Complainant served a First Set of Data Requests on August 4, 2026 seeking the account's complete billing and meter-read history. SoCalGas responded, produced additional records on September 15 and 16, 2026, served a response letter on October 23, 2026, and made a supplemental production thereafter. SoCalGas has produced the following, which Complainant acknowledges:

1. **Statement of Account Archive Report** (CPED DR-DIS-00254-2 Q5), a ledger covering August 12, 2021 to July 15, 2026.
2. **Billing Recap** enclosed with SoCalGas's April 15, 2026 letter, covering September 2021 forward.
3. **Bill images** from September 2024 forward.
4. **Interval meter data** in native Excel from the September 6, 2024 Advanced Meter installation through September 15, 2026.
5. **Other records,** including meter test and field-disconnection records, the CPED response to DR-DIS-00254-2, and a recording of a March 17, 2026 call.

C. Complainant's Repeated Notice to SoCalGas and the Commission

Complainant disputed this balance long before the disconnection. On August 11, 2025, Complainant filed Informal Complaint IC 693785 with the Consumer Affairs Branch, disputing approximately $5,000 in charges for lack of meter-read records and itemized billing. On September 3 and 4, 2025, SoCalGas told the Branch that the charges were consistent with recorded usage and meter readings, while submitting a confidentiality declaration withholding the underlying records. The Branch closed the complaint on September 15, 2025 without any billing records being provided to Complainant. SoCalGas disconnected service on March 12, 2026. Complainant filed a second informal complaint, IC 722054, and then this formal complaint on June 23, 2026. SoCalGas's Billing Recap now shows that the reads for September 2021 through July 2022 are no longer available.

D. Meet and Confer

The parties met and conferred by video conference on October 29, 2026, as required by Rule 11.3(a). SoCalGas declined to produce bills and records older than three years, citing Tariff Rule 16, and proposed that the balance be placed in AMP. Complainant declined to carry an unsubstantiated balance into AMP. SoCalGas also stated it had no notice of Complainant's disability, although the account history attached to its Answer shows MEDICAL entries on August 30, 2024 and March 17, 2026 and Complainant was enrolled in CARE. The dispute over the records described below remains unresolved. (Declaration of Delia Lovell, attached.)

III. RECORDS COMPLAINANT ASKS THE COMMISSION TO COMPEL

To reduce the burden on SoCalGas, Complainant has narrowed the records sought after the meet and confer to the two categories essential to Issue 1 of the Scoping Memo. The data requests and SoCalGas's response are attached as Attachments A and B.

1. **Meter reads, charges, and bills behind every dollar demanded.** For every billing period whose charges make up any part of the $5,585.27 balance, from the first such charge to the last bill: (a) the beginning and ending meter reads, read dates, and whether each read was actual or estimated; (b) the amount charged and the rate applied; and (c) the bill as issued to Complainant.

2. **Every name, address, and account billed.** Every account number, name billed, service address, and billing or mailing address SoCalGas has billed (a) in the name of Delia Lovell and (b) for service at 325 Emerald Drive, Lake Arrowhead, from the opening of

service to the present, together with the basis on which SoCalGas attributed this account to Lovell Investment Trust LLC.

IV. ARGUMENT

A. The Scoping Memo Requires a Bill-by-Bill Determination

The Assigned Commissioner's Scoping Memo and Ruling of October 21, 2026 places bill accuracy at issue and calls for identification of each monthly bill containing an error and the amount of the error (Issue 1). That determination cannot be made without the meter read and bill for each billing period that makes up the balance. The records sought are therefore not only relevant under Rule 10.1, which permits discovery of any matter relevant to the subject of the proceeding; they are necessary for the Commission to decide the issue it has scoped.

B. The Production Does Not Substantiate the Balance

Measured against the balance demanded, the production leaves specific gaps:

1. **Missing reads.** SoCalGas's Billing Recap states that the reads for every billing period from September 2021 through July 2022 are "Information no longer available in Customer Information System." Those periods were billed $3,341.43, and those charges were carried into both AMP enrollments and the reinstated balance.

2. **Missing bills.** No bill images before September 2024 have been produced, although the balance includes charges originating years earlier.

3. **Unexplained origin.** The ledger begins August 12, 2021 with a carried balance whose source is not shown, and the AMP reinstatements returned older charges to the account without the reads or bills behind them.

4. **Conflicting reads.** SoCalGas acknowledges that its ledger and Billing Recap report different reads for some of the same periods, but has not identified which read is correct for each period or the effect on the bill.

5. **Incomplete interval data.** The interval data omits July 11 to August 12, 2025 (the file produced for that period duplicates the following month) and ends September 15, 2026.

SoCalGas has also corrected its own billing on this account several times, writing off bills as "incorrect estimate" in October 2022, February 2023, and April 2024. Complainant recognizes those corrections as good-faith efforts. They also confirm why the underlying reads and bills must be produced: the account's history includes acknowledged billing errors, and only the source records can show whether every remaining charge is accurate.

C. SoCalGas Bears the Burden of Substantiating Its Charges

Public Utilities Code section 451 requires that all charges demanded by a utility be just and reasonable, and section 532 prohibits a utility from collecting compensation other than the rates in its filed tariffs. A charge that cannot be traced to a recorded read and a tariff rate cannot be shown to meet either requirement. Under SoCalGas Tariff Rule 14, Section C, estimated bills not caused by the customer or a disaster are billing error for purposes of Rule 16, and Rule 16 limits the backbilling of a residential undercharge caused by billing error to three months. General Order 28 requires a utility to preserve the records supporting its accounts and bars their destruction without the Commission's written authority. Each of these provisions presumes that the utility can produce the reads and bills behind the amounts it collects.

D. Rule 16's Three-Year Period Limits Refunds, Not Discovery

SoCalGas's objection to producing records older than three years rests on Tariff Rule 16. That provision governs the period for calculating a refund to the customer. It does not make older records irrelevant where, as here, SoCalGas is collecting today a balance that includes charges originating earlier, including charges it returned to the account through the 2022 and 2025 AMP reinstatements. If SoCalGas seeks to collect a charge, it should be able to produce the read and bill behind it, regardless of when the charge first arose.

E. An Untraced Balance Should Not Be Collected or Re-Enrolled in AMP

AMP is designed to help customers retire legitimate arrearages. Transferring a balance that cannot be traced to reads and bills into a third AMP enrollment would not resolve whether that balance is owed; it would defer the question while obligating Complainant to it. The appropriate course is for SoCalGas to substantiate the balance, or for any portion it cannot substantiate to be removed.

V. RELIEF REQUESTED

Complainant respectfully requests a ruling that:

1. **Production.** The motion be decided at the November 6, 2026 status conference, and SoCalGas produce the records described in Section III, in native electronic format where available, by a date the Administrative Law Judge sets.

2. **Record held open.** If the records cannot be produced before the November 10, 2026 evidentiary hearing, the record on Issue 1 remain open, or Issue 1 be deferred, until SoCalGas produces them.

3. **Certification.** If SoCalGas contends that any responsive meter read or bill no longer exists, SoCalGas shall identify each such record, state when and how it ceased to exist, and identify any Commission authority for its destruction under General Order 28.

4. **Interim protection.** Pending a decision on the complaint, SoCalGas shall not transfer the disputed balance into AMP, pursue collection of it, or report it to any consumer reporting agency.

5. **Effect of nonproduction.** Any charge that SoCalGas does not trace to a meter read and a bill in its production may not be relied on by SoCalGas to support the balance demanded.

6. **Shortened response time.** Given the November 10, 2026 evidentiary hearing, the time for SoCalGas to respond to this motion under Rule 11.1 shall be shortened as the Administrative Law Judge deems appropriate.

This motion seeks production only. Complainant's claims for financial relief remain before the Commission on the merits: removal of every charge SoCalGas cannot trace to a meter read and a bill, reparations under Public Utilities Code sections 734 and 736, and penalties under sections 2107 and 2108. The disconnection and the billing described here have caused Complainant emotional distress, pain and suffering, physical harm, loss of use of the home, loss of security and safety in the home, forced relocation, and sustained stress, and Complainant reserves all claims for those damages under section 2106.

VI. CONCLUSION

Complainant has made payments on this account in every year of the disputed period and has engaged in good faith with SoCalGas throughout discovery. Complainant asks only that SoCalGas show the meter reads and bills behind the balance it demands. The motion should be granted.

Dated: November 2, 2026

Respectfully submitted,



/s/ Delia Lovell

Delia Lovell (Preferred Name: Wolf)
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DECLARATION OF DELIA LOVELL IN SUPPORT OF MOTION TO COMPEL
(Rule 11.3(a))

I, Delia Lovell, declare:

1. I am the Complainant in this proceeding and the account holder of SoCalGas Account No. 03652217062. I have personal knowledge of the facts stated here.

2. On August 11, 2025, I filed Informal Complaint IC 693785 disputing the balance for lack of meter-read records and itemized billing. It was closed on September 15, 2025 without any billing records being provided to me.

3. On August 4, 2026, I served my First Set of Data Requests on SoCalGas seeking the complete billing and meter-read history for the account.

4. SoCalGas produced records on September 15 and 16, 2026, served a response letter on October 23, 2026, and made a supplemental production. The records produced are described in Section II.B of the motion.

5. On October 29, 2026, I met and conferred with SoCalGas counsel Ismael Bautista, Jr. by video conference in a good-faith effort to resolve this dispute. SoCalGas declined to produce bills and records older than three years and proposed placing the balance in AMP. I declined to carry an unsubstantiated balance into AMP. The parties were unable to resolve the dispute over the records requested in this motion.

6. Attached as Attachment A is a true copy of my First Set of Data Requests, and as Attachment B a true copy of SoCalGas's October 23, 2026 response letter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 2, 2026, at Lake Arrowhead, California.



/s/ Delia Lovell
Delia Lovell

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Delia Lovell, Complainant, vs. Southern California Gas Company (U 904 G), Defendant.	Case 26-06-024 (Filed June 23, 2026)

[PROPOSED] ADMINISTRATIVE LAW JUDGE'S RULING GRANTING COMPLAINANT'S MOTION TO COMPEL

Complainant Delia Lovell's Motion to Compel Production of Meter Reads, Bills, and Account Records, filed November 2, 2026, is granted. IT IS RULED that:

1. Southern California Gas Company (SoCalGas) shall produce, in native electronic format where available, no later than _____, 2026: (a) for every billing period whose charges make up any part of the balance demanded on Account No. 03652217062, the beginning and ending meter reads, read dates, whether each read was actual or estimated, the amount charged and rate applied, and the bill as issued; and (b) every account number, name billed, service address, and billing or mailing address SoCalGas has billed in the name of Delia Lovell or for service at 325 Emerald Drive, Lake Arrowhead, and the basis for attributing the account to Lovell Investment Trust LLC.

2. If SoCalGas contends any responsive record no longer exists, it shall identify the record, state when and how it ceased to exist, and identify any Commission authority for its destruction.

3. Pending a decision on the complaint, SoCalGas shall not transfer the disputed balance into the Arrearage Management Plan, pursue collection of it, or report it to any consumer reporting agency.

4. SoCalGas may not rely on any charge it does not trace to a meter read and a bill in its production to support the balance demanded.

5. If production is not complete before the evidentiary hearing, the record on Issue 1 shall remain open until it is complete.

Dated _____, 2026, at San Francisco, California.

_____
Camille Watts-Zagha
Administrative Law Judge