

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

**Item# 3 (Rev.1)
Agenda ID# 23629
RESOLUTION G-3606
October 30, 2025**

R E S O L U T I O N

Resolution G-3606. Approves and denies in part San Diego Gas & Electric's 2024 Compliance Plan, Forecasts and Caps for its Natural Gas Leak Abatement Program.

PROPOSED OUTCOME:

Approves in part and denies in part ratemaking forecasts and cost caps submitted by San Diego Gas & Electric (SDG&E) for its 2024 Natural Gas Leak Abatement (NGLA) program in Advice Letter 3285-G-A and approves request for rate recovery of previously approved under-recovered capital costs.

SAFETY CONSIDERATIONS:

- Repairing or replacing pipes and modifying operations and associated infrastructure to reduce methane emissions also results in modest improvements to natural gas pipeline safety.

ESTIMATED COST:

- The Total Revenue Requirement for SDG&E's 2025-2026 Natural Gas Leak Abatement Program is \$2,901,566, including \$2,566,898 for selected Best Practices (including costs incurred to July 28, 2025); \$112,668 for Research, Development and Demonstration projects; and \$222,000 for recovery in 2025 and 2026 of SDG&E's previously approved but unrecovered Natural Gas Leak Abatement Program capital costs.
 - By Advice Letter 3285-G filed March 15, 2024, and Advice Letter 3285-G-A filed November 5, 2024.
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SUMMARY

This Resolution approves in part and denies in part SDG&E's 2024 Natural Gas Leak Abatement Compliance Plan and the ratemaking forecasts as presented in Advice Letter (AL) 3285-G-A. The purpose of the 2024 Compliance Plan is to propose how the utility will reduce emissions and implement the 26 Best Practices for natural gas leak abatement adopted in Decision (D.) 17-06-015 and to detail their costs and cost effectiveness. SDG&E's proposed 2024 Compliance Plan includes 14 chapters, with each chapter describing how a subset of the Best Practices would be addressed. AL 3285-A requests rate recovery of the costs for the 2024 Compliance Plan.

SDG&E forecasts a Total Revenue Requirement¹ of \$24.859 million in Advice Letter 3285-G-A: \$22.919 million for Best Practices; \$1.29 million for Research, Development, and Demonstration (RD&D) projects; \$0.428 million for Program Administration; and \$0.222 million for under-recovered ongoing capital revenue requirement. Best Practice proposals are described in Attachment A, Safety Policy Division's (SPD) Review of SDG&E's 2024 NGLA Compliance Plan.

This Resolution approves \$2,566,898 for Best Practices, including costs incurred to July 28, 2025. We also approve \$112,668 for RD&D in 2025. SDG&E is authorized to record up to \$428,000 for NGLA Program Administration, if applicable, in the Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA) for potential recovery in a future general rate case or other proceeding, where it will be subject to reasonableness review. We approve \$222,000 over the two years for unrecovered ongoing capital costs from previously approved Compliance Plans. For the year 2027, we approve a total revenue requirement of \$290,657 for the three chapters approved for continued funding in this resolution capped at their 2026 level.

¹ The Total Revenue Requirement is the total cost of a program. The Average Annual Revenue Requirement (AARR) is the average yearly cost during the 2025-2026 Compliance Plan Period. The AARR is made up of both capital and operations and maintenance (O&M) costs. Capital costs are collected evenly over the expected length of the life of the asset, and one year of such costs is included in the AARR. For O&M, the AARR includes the total costs during the Compliance Plan Period divided by the number of years of the program, in this case, two years. SoCalGas identifies each of the chapters' capital and O&M costs separately in its Compliance Plan.

BACKGROUND

On September 21, 2014, Senate Bill (SB) 1371 (Leno) was signed into law.² SB 1371 directs the California Public Utilities Commission to adopt rules and procedures to provide for the “maximum technologically feasible and cost-effective” reduction of methane emissions from CPUC-regulated gas facilities.

On September 19, 2016, SB 1383 (Lara) was signed into law. SB 1383 requires the California Air Resources Board (CARB) in coordination with other state and local agencies and districts, to approve and begin implementing a comprehensive strategy by January 1, 2018 to reduce methane emissions by 40 percent by 2030.

On June 15, 2017, the CPUC issued D.17-06-015 as part of Rulemaking (R.) 15-01-008, which directed SDG&E to submit a Tier 3 Advice Letter (AL) to establish 2018 and 2019 revenue requirement forecasts and caps for the Natural Gas Leak Abatement program. The AL was to include the incremental costs for each of 26 Best Practices as well as costs for pilot projects and RD&D broken down by type of expenditure, justifications for pilot and RD&D projects, and the proposed allocation methodology. Ordering Paragraph (OP) 12 of D.17-06-015 states that the ratemaking forecasts and caps that the CPUC approves in response to the Tier 3 ALs shall apply until the NGLA is incorporated into each utility’s next General Rate Case (GRC) or other gas ratemaking proceeding.

Because of the uncertainty and difficulty of forecasting costs for the new program, D.17-06-015 also established two balancing accounts and one memorandum account in which to record expenses for the NGLA program, as follows:³

- For the Best Practices/Chapters: a two-way balancing account that is a subaccount of the New Environmental Regulation Balancing Account (NERBA). The subaccount’s name is NERBA-Natural Gas Leak Abatement Program (NERBA-NGLAP).
- For the program’s RD&D: a one-way balancing account, the Natural Gas Leak Abatement Balancing Account (NGLAPBA);
- For Program Administration: a memo account, the NGLAPMA, to track the incremental expenses related to the program’s reporting and administration, to be subject to reasonableness review in a future GRC for recovery.

On October 12, 2018, Resolution 3538 was adopted, approving with modifications the forecast requests for PG&E, SoCalGas, SDG&E, and Southwest Gas Corporations’

² SB 1371 is codified in Public Utilities Code Section 975-978.

³ D.17-06-015 at 132-133.

Compliance Plans through 2020. SDG&E's forecast of \$12.3 million was approved for the two-year program. Ordering Paragraph 5 of Resolution 3538 orders the utilities to each:

Submit a Tier 1 Advice Letter with revised tariff sheets to recover forecasted costs in the Natural Gas Leak Abatement Program Balancing Account for 2018. The balance in the two-way balancing account shall be subject to refund or recovery from customers in the following year through the Annual Gas True-Up advice letter filing.

For 2019, OP 6 adds:

Each utility will include the authorized cost forecast and cost limit in their gas transportation rates in connection with their consolidated rate update submittal for rates effective January 1, 2019, with balancing account balances subject to true up as in OP 5.

For 2020, OP 7 addresses potential funding gaps between the two-year Compliance Plan cycle with SoCalGas and SDG&E's consolidated rate update submittal for rates effective January 1, 2020, stating:

Each utility may include the authorized cost forecast and cost limit to bridge the funding gap of the two year Leak Abatement Compliance Plan with their consolidated rate update submittal for rates effective January 1, 2020.

OP 7 then repeats the same "subject to refund or recovery" language for balances in the two-way balancing account stated in OP 5 and 6, with balances in the two-way balancing account trued up in the following year through the Annual Gas True-Up advice letter filing. Resolution 3538 also notes that balances in all accounts authorized for recovery are subject to audit, verification, and adjustment.⁴

On August 15, 2019, the CPUC adopted a Second Phase Decision, D.19-08-020, establishing additional policies, including requiring use of the utility-proposed standard cost effectiveness methodology and two additional cost-benefit analyses, the Cap-and-Trade cost benefit test and the Social Cost of Methane.⁵ The Decision also imposed a restriction on rate recovery for Lost and Unaccounted For (LUAF) gas

⁴ Resolution G-3538 at 8.

⁵ D.19-08-020, FOF 8, 9&10 and OP 2&3.

beginning in 2025 for SoCalGas and Pacific Gas & Electric (PG&E) if their methane emissions are not greater than 20 percent below the 2015 baseline levels.⁶ This performance objective reflects the CPUC's intent that SoCalGas and PG&E be at least halfway to achieving their share of the state's goal of a 40 percent reduction in methane emissions by 2030, consistent with SB 1383, while noting that the 40 percent is a soft target. SDG&E was not subject to the restriction on rate recovery for not achieving the 20 percent reduction in methane emissions by 2025 because their system is much newer and therefore has fewer emissions to reduce.

D.19-08-020 also confirmed the CPUC's Safety Enforcement Division's (SED) authority to approve NGLA compliance plans and to disapprove any measures it finds not to be in the ratepayers' interest.⁷ The authority was transferred to the Safety Policy Division upon creation of that new division. SPD staff evaluate each biennial compliance plan in consultation with CARB and Energy Division staff.

D.19-08-020 further ordered the convening of a workshop by the CPUC's Energy Division and SPD in cooperation with the Technical Working Group⁸ established in R.15-01-008 to refine the scope and detail of the compliance plans and Tier 3 Advice Letters pertaining to cost-effectiveness and cost-benefit analysis.⁹ It also stated that SPD and ED Staff have the authority to convene the Technical Working Group every two years to consider updates to the NGLA compliance plans.¹⁰

On October 21, 2019, the public workshop was held. The guidelines¹¹ developed allow more than one of the 26 Best Practices to be addressed by a combination of actions that may be grouped together in a chapter of the compliance plan.¹² Members of the

⁶ D.19-08-020, p.2 and OP 5.

⁷ D.19-08-020, p. 19: "SED has authority delegated by the CPUC to approve biennial compliance plans and disapprove any project it determines is not in the ratepayer's interest."

⁸ At the time of the initial decision, any party to the proceeding who was interested could join the Technical Working Group. Parties that joined initially included EDF and TURN along with the gas companies and CARB.

⁹ D.19-08-020, OPs 6 and 7.

¹⁰ D.19-08-020, COL 19.

¹¹ Email directive from SPD to utilities, "Compliance Plan Guidelines for Natural Gas Leak Abatement Program," November 25, 2019. The NGLA Compliance Plans filed in 2020 reflect those guidelines, primarily the concept that Plan chapters can incorporate more than one best practice. The previous guidelines required a separate chapter for each of the 26 best practices, which was found to be inefficient since SPD had found that a particular measure could address more than one best practice at the same time.

¹² In SDG&E's case, this resulted in 14 Chapters.

Technical Working Group have since been invited to the annual NGLA workshops held by SPD, CARB, and the utilities.

On January 16, 2020, the CPUC modified the GRC interval periods for each utility, adopting an extension of the GRC cycle for each utility from three years to four years and extending SDG&E's then-current cycle through 2023.¹³

On March 12, 2020, SDG&E submitted AL 2852-G to provide forecasted costs for its 2020 Compliance Plan, including its forecast of costs and emissions reductions for the years 2021 and 2022 and revenue requirements for the life of the capital projects. SDG&E made various corrections to its initial filing in ALs 2852-G-A, 2852-G-B, and 2852-G-C, which were filed on June 12, 2020; June 29, 2020; and October 2, 2020, respectively.

On March 12, 2020, SDG&E filed its 2020 Compliance Plan, which was subsequently amended on June 12 and September 4, 2020.¹⁴

On December 17, 2020, the CPUC issued Resolution G-3577 approving AL 2852-G-C and the SDG&E 2020 Compliance Plan for a Total Revenue Requirement of \$15.8 million over the life of the capital projects.¹⁵ This resulted in an overall rate increase of 0.7 percent for 2021 and 0.3 percent in 2022.¹⁶

On November 18, 2021, the CPUC's Executive Director granted SoCalGas and SDG&E an extension of time to comply with Ordering Paragraph 12 of D.17-06-015, delaying the incorporation of the leak abatement programs into its GRC until Test Year 2028, which is expected to be filed by May 15, 2026.

On March 15, 2022, SDG&E submitted its 2022 NGLA Compliance Plan for 2023 and 2024 and AL 3071-G, which provided forecasted costs for the two-year Plan. SDG&E made revisions and corrections in AL 3071-G-A and AL 3071-G-B, which were filed on February 21, 2023 and April 11, 2023, respectively. AL 3071-G-B requested a Total Revenue Requirement of \$24.3 million. The annual revenue requirement requested for 2023 and 2024 was \$7.2 million and \$7.7 million respectively, not including Franchise

¹³ D.20-01-002, issued on January 16, 2020.

¹⁴ SDG&E SB 1371 Amended 2020 Compliance Plan.pdf (sdge.com).

¹⁵ It has been understood throughout the process of reviewing the NGLA requests for funding that they include the ongoing costs for the life of the capital projects, just as they would in a General Rate Case, and that once they are approved, these are put into the utility's rates for the life of the capital projects and not just the two years of the NGLA Compliance Plan cycle.

¹⁶ Resolution G-3576 p. 3.

Fees and Uncollectibles.¹⁷ The resulting overall rate increase requested was 0.3 percent for 2023 and 0.4 percent for 2024.

On November 16, 2022, CARB issued its 2022 Scoping Plan, which increases its target for the reduction of fugitive methane emissions from natural gas infrastructure from 40 to 50 percent by 2030.¹⁸

On June 29, 2023, the CPUC issued Resolution G-3599, approving in part and denying in part SDG&E's 2022 Compliance Plan and AL 3071-G-B. Resolution G-3599 approved a total forecasted revenue requirement of \$19,265,211 over the life of the capital projects,¹⁹ an approximately 21 percent reduction from SDG&E's request. Funding for several chapters of SDG&E's 2022 Compliance Plan was not approved due to their very poor cost-effectiveness.

OP 2 of Resolution G-3599 required the Safety Policy Division and the Energy Division, in consultation with CARB, to convene a meeting of the NGLA's Technical Working Group by September 30, 2023, to receive input and find balance between the dual priorities of the program: maximum methane emissions reductions and cost effectiveness. This meeting was held virtually on September 28, 2023.

As a result of the Technical Working Group meeting, SPD issued directions to the utilities to continue to provide values for the three existing cost-effectiveness tests. SPD also allowed the utilities to include additional cost-effectiveness values that include safety benefits, where appropriate. SPD further directed the utilities to update the values for the social cost of methane as presented in D.19-08-020 for inflation by using the California Consumer Price Index. Additionally, SPD instructed utilities that RD&D programs should prioritize improving cost-effectiveness.

On March 15, 2024, SDG&E submitted its 2024 NGLA Compliance Plan and AL 3285-G, which provides 2025 and 2026 forecasted costs for the Plan's Chapters, RD&D, and Program Administration and under-recovered costs from prior approved compliance plans. SDG&E submitted an amended 2024 Compliance Plan on April 4, 2024. A revised AL 3285-G-A was submitted on November 5, 2024 to correct some inadvertent omissions in the previous AL's Table 4, which presents the revenue requirements to be entered into rates in 2025 and 2026. While D.19-08-020 exempts SDG&E's NGLA program from the 20 percent greenhouse gas reduction goal beginning in 2025 because

¹⁷ The sum of the 2023 and 2024 annual revenue requirement is less than the Total Revenue Requirement because there are significant capital costs in some of the leak abatement programs, which are recovered over a longer period.

¹⁸ 2022 CARB Scoping Plan, p. 79, Table 2-1: <https://ww2.arb.ca.gov/sites/default/files/2022-12-/2022-sp.pdf#page=252&zoom=100,93,469>.

¹⁹ Resolution G-3599, OP 1.

its system is much newer and therefore has fewer leaks to reduce, its implementation of the mandatory Best Practices ordered in D.17-06-015 will achieve an estimated 8 percent reduction from the most recent adjusted 2015 baseline, according to SPD's evaluation of SDG&E's 2024 Compliance Plan.²⁰

NOTICE

Notices of AL 3285-G and 3285-G-A were made by publication in the Commission's Daily Calendar. SDG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

ALs 3285-G and 3285-G-A were not protested. Consistent with General Order 96-B, General Rule 7.5.1 the original protest and comment period designated in AL 3285-G was not reopened.

DISCUSSION

The CPUC considered SDG&E AL 3285-G-A and SPD's Evaluation of SDG&E's 2024 NGLA Compliance Plan (the "SPD Evaluation Report," attached as Attachment A) in reaching a determination that balances the goals of cost-effectiveness and emissions reductions.

Cost-Effectiveness

The SPD Evaluation Report considers the cost-effectiveness methodologies established in D.19-08-020. Three types of cost-effectiveness methods are to be considered for comparison purposes. These include the standard cost-effective measurement, the avoided Cap-and-Trade cost, and the avoided Social Cost of Methane as comparison measures. D.19-08-020 does not establish a threshold cost-effectiveness value or limit for the NGLA program.

The standard cost-effectiveness measure is based on the Average Annual Revenue Requirement (AARR),²¹ from which the cost of the gas saved is deducted, divided by the annual emissions reduction for the program. This standard cost-effectiveness is then

²⁰Safety Policy Division Evaluation of SDG&E's 2024 NGLA Compliance Plan, June 30, 2025 at 2 (Attachment A to this resolution).

²¹ As explained in fn 1, SDG&E identifies each of the chapters' capital and O&M costs separately in its Compliance Plan. The AARR is the basis for the standard cost-effectiveness calculations for each measure, as noted above in fn 1.

expressed in dollars per thousand standard cubic feet of natural gas emissions avoided or \$/MCF.²² Given this method, a lower numerical value denotes a better cost-effectiveness.

As required by D.19-08-020, the 2024 Compliance Plan continues the use of the avoided Cap and Trade compliance costs and the avoided Social Cost of Methane. The avoided Cap-and-Trade cost is based on the reduction in gas throughput caused by abating leaks and quantifies the greenhouse gas (GHG) impact by assuming that all gas throughput is combusted to carbon dioxide (CO₂) and emitted to the atmosphere.

For SDG&E, an annual Advice Letter forecasts the rate impact of Cap-and-Trade costs. If approved, these costs are added to rates. To estimate the value of reduced Cap and Trade compliance costs, SDG&E assumed a December 2025 vintage futures value based on the five-day average of the first trading days of the year, January 2-8, 2024, from the International Exchange: \$45.12 per metric ton of CO₂ equivalent (MTCO₂e). Compliance with the CPUC's instructions produced a Cap-and-Trade benefit value of \$2.46/MCF, which was used for the 2024 Compliance Plan.²³

The benefit of the avoided Social Cost of Methane is the reduction in the future cost to society from the environmental impact of leaked methane that has not been combusted, which has a higher global warming potential in the short term than CO₂. D.19-08-020 provides a Table of Estimates for the Social Cost of Methane for use in the utilities' compliance plans. Following the 2023 Technical Working Group meeting, SPD staff provided written guidance to update those values using the California Consumer Price Index (CPI). In the 2024 Compliance Plan, SDG&E updated the Phase II Decision estimate for 2020 by applying the California CPI, which resulted in a social cost of methane of \$24.42/MCF.

These two additional cost-effectiveness tests are to be used for "information and comparison purposes."²⁴ Including the combined values for the Cap-and-Trade cost benefit and the Social Cost of Methane, a measure is said to achieve a "break-even" net cost-effectiveness of \$0/MCF when it has a standard cost-effectiveness of approximately

²² Different units for natural gas are used in different contexts. One MCF is roughly equal to 1.038 million British thermal units (MMBtu), the unit typically used when pricing natural gas, and 10.38 therms, the unit used on customer bills: <https://www.eia.gov/tools/faqs/faq.php?id=45&t=8>. Natural gas spot prices at the Henry Hub, the pricing point for natural gas prices on the New York Mercantile Exchange, averaged \$2.29 per MCF and \$2.21 per MMBtu in 2024. Source: [Spot Henry Hub natural gas prices hit a historic low in 2024 - U.S. Energy Information Administration \(EIA\)](#).

²³ Safety Policy Division Evaluation of SDG&E's 2024 NGLA Compliance Plan, June 30, 2025 at 5.

²⁴ D.19-08-020, p. 36

\$26.88/MCF.²⁵ This is \$4.88 higher than the break-even value of \$22/MCF in the 2022 Compliance Plan period of 2023-2024.

During the 2023 Technical Working Group, SPD staff suggested the inclusion of an optional cost-benefit test that included the safety cost benefits of an activity, where relevant. The test that was developed yielded an estimated value of \$1/MCF at most.²⁶

In addition to the cost-effectiveness of a measure, SPD considers other factors, as follows:

- Is it required for compliance with the Best Practices specified in D.19-08-020?
- Is it technically feasible?
- Is its cost-effectiveness improving over time?
- What is its contribution to achieving the program's emission reduction goals?
- Is it foundational for the functioning of the program (i.e., training, tracking and performing measurements of emissions)?
- Does it provide the "biggest bang for the buck" (FOF, D.19-08-020)?

As a result of this broader consideration of each measure in the utility's compliance plans, SPD's evaluation may approve measures that are not cost-effective. This is explicitly stated in D.19-08-020, which recognized that the cost of "maximum technologically feasible" measures might be expensive: "...we do not adopt a requirement that all measures, or the Compliance Plans in their entirety, must show a positive benefit to cost ratio under either methodology. The CPUC retains full discretion to evaluate measures proposed in the Compliance Plans considering cost-effectiveness along with other qualitative factors and policy goals."²⁷

SPD's review of the SDG&E 2024 Compliance Plan evaluates the impact of the updated baseline on the amount of emissions reduction required by 2030. SPD's review states that SDG&E's 2024 Compliance Plan forecasts an emissions reduction of 8 percent by 2025 (relative to the 2015 baseline). However, as noted above, unlike SoCalGas, SDG&E is not mandated to reduce emissions by the target of 20 percent by 2025, established in D.19-08-020 for SoCalGas and Pacific Gas and Electric Company. SPD also reports that SDG&E's 2024 Compliance Plan forecast does not meet the statewide greenhouse gas (GHG) reduction goal of 40 percent by 2030.

²⁵SPD Review of 2024 SDG&E Evaluation Report at 4.

²⁶ Ibid.

²⁷ D.19-08-020 at 27.

As shown and further described in Attachment A, SPD approves all chapters of SDG&E's 2024 Compliance Plan, except for Chapter 1 assuming that Chapter 14 is implemented. If Chapter 14 is not operational, SPD approves continuation of Chapter 1. SPD also recommends approval of SDG&E's six RD&D projects.

Discussion of Chapters and Measures Proposed by SDG&E

SPD's review of the SDG&E's 2024 Compliance Plan indicates that none of SDG&E's Best Practices are cost-effective. SB 1371 states that the Commission should prioritize affordability considerations and instructs the Commission to approve cost-effective emissions reduction measures.²⁸ As noted in D.19-08-020 and the enabling statute, "Affordability must also be at the forefront and a priority as required by SB 1371."²⁹ Indeed, the Commission must scrutinize every program we authorize for cost-effectiveness.

We approve four Best Practices for 2025-2026 funding: Recordkeeping/IT, Damage Prevention/Public Awareness, and Public Leak Maps. We also approve funding for costs incurred in the first seven months of 2025 (January 1 – July 28) for five practices. Revenue Requirements for the following Best Practices are partially approved, approved as requested, or denied.

Chapter 1: Increased Leak Survey: \$1,253,842

Chapter 1 supports compliance with accelerated leak surveys on SDG&E's vintage steel and pre-1986 Aldyl-A plastic pipe, which are most prone to leaks, and three-year leak surveys for state-of-the-art plastic protected steel pipelines, for compliance with Best Practices required by D.17-06-015.

SDG&E has only requested funding for 2025 in its Comments, noting that it can decelerate its leak surveys quickly. Between January 1, and July 28, 2025, the utility completed 92 accelerated leak surveys, found 119 leaks on distribution mains and services and 788 leaks on Meter Set Assemblies, and repaired 862 of the leaks found. SDG&E estimates the total volume of emissions reductions during this period to be 4,980 thousand standard cubic feet (Mscf).³⁰

²⁸ See Pub. Util Code sections 975(b), 975(e)(1), and 977(d).

²⁹ D.19-08-020 at 27.

³⁰ SDG&E Data Response October 17, 2025, at 3. SDG&E notes that it typically uses its Annual Emissions Reports to estimate emissions reductions due to a prior year's specific practices and repairs, but that report will not be submitted until June 15, 2026, hence 2024 average per-leak data was used for this estimate. SDG&E used a CPUC-approved population-based factor to estimate the impact of repairing leaks to Meter Set Assemblies.

We find it reasonable to approve 2025 funding of \$1,253,842, for costs incurred between January 1 and July 28, 2025. Consistent with SDG&E's updated request, we do not approve continued funding for this practice after July 28, 2025.

Chapter 2: Blowdown Reduction Activities: (Transmission)\$163,827

Blowdowns are intentional gas releases, usually performed for maintenance purposes. The Best Practice for reducing blowdown emissions involves reducing pressure before the blowdown and/or using portable compressors to contain the emissions. SPD recommends continued approval of this practice. SDG&E completed 13 blowdown reductions between January 1 and July 28, 2025, and preliminarily estimates that it reduced emissions by 1,726 Mscf from this activity.³¹

Unlike SoCalGas's Blowdown program, SDG&E's Blowdown activities are not cost-effective, and therefore we do not approve SDG&E's request for full funding. However, we find it reasonable to approve funding for costs of \$163,827 incurred between January 1 and July 28, 2025 due to the emissions reductions achieved during this period.

Chapter 4: Recordkeeping IT Projects: \$198,554

This Best Practice requires that utilities maintain thorough records of their methane emissions and leaks and all data and assumptions used to determine the volume released. SDG&E amended its initial request of \$412,000 in AL 3285-G-A to \$198,554 in its Comments. SPD recommends continued approval of this practice.

We find it reasonable to approve a revenue requirement of \$175,525 in 2025 and \$23,019 in 2026 for a total revenue requirement of \$198,554 so that records and data are maintained.

Chapter 6: Electronic Leak Survey: \$333,984

This Best Practice requires utilities to improve geographic tracking and evaluation technologies. SDG&E requests full funding of its request of \$2,776,509 for this practice. SPD recommends continued approval of this practice. Between January 1, 2025, and July 28, 2025, SDG&E added new functionality to generate Special Leak Surveys and digitally route them to field tablets. Special Leak Surveys are conducted for emergency events, and prior to this enhancement were conducted using paper maps. SDG&E estimates that 3,153 leaks were surveyed during this period using Electronic Leak Survey technology, and 320 Special Leak Surveys were conducted.³²

³¹ SDG&E Data Response, October 16, 2025 at 4.

³² SDG&E Data Response, October 16, 2025 at 5.

We find it reasonable to approve a revenue requirement of \$333,984 for costs incurred through July 28, 2025 as this enhancement improves efficiency and response times to emergencies and improves public safety.

Chapter 7: Damage Prevention Public Awareness: \$533,424

This chapter is in response to Best Practices to avoid excavation damage to pipelines from the public or third-party contractors, commonly known as “Call Before You Dig—811.” Utilities are required by D.17-06-015 to expand their public information beyond those funded in GRCs to satisfy this Best Practice. SDG&E requests full funding for this Best Practice. SPD recommends continued approval of this practice.

We note that SDG&E requests significantly more funding for this item than the \$286,831 we approved for SoCalGas in Resolution G-3605 with its much larger service territory. We therefore find it reasonable to approve a total revenue requirement for 2025 of \$266,712, which is based on costs incurred through July 28, 2025, and the same amount for 2026, for a total revenue requirement for the two years of \$533,424.

Chapter 8: Pipe Fitting Specifications: \$864

This chapter is in response to Best Practice 22, which requires the utilities to improve their pipe fitting specifications to reduce leaks, which are common in pipe fittings that have low-quality threads. SDG&E requests funding of \$1,498,554 for this practice. SPD recommends continued approval of this practice. SDG&E implements this program by improving its processes for ensuring the quality of pipe fittings for future installations and thus does not track the number of replaced pipe fittings.³³

We find it reasonable to approve funding of incurred costs (January 1, 2025-July 28, 2025) of \$864 for Pipe Fitting Specifications.

Chapter 10: Gas Speciation: \$80,566

This Best Practice requires utilities to use enhanced methane detection practices to differentiate between sources of methane found to be leaking, as utility pipeline gas has a different chemical composition than other sources of methane. When the source of a leak is in question, SoCalGas uses a mobile gas speciation van to identify what type of gas is leaking. SDG&E requests funding of \$550,057 for this practice. SPD recommends continued approval of this practice. The costs charged to this chapter between January 1 and July 28, 2025 were for project coordination, gas speciation sampling, and documentation. Between January 1, 2025, and July 28, 2025, SDG&E speciated eight

³³ SDG&E Data Response, October 16, 2025 at 7.

leaks.³⁴

We find it reasonable to approve funding of incurred costs (January 1, 2025 – July 28, 2025) of \$80,566 for Gas Speciation.

Chapter 11: Public Leak Maps: \$1,837

This Best Practice requires utilities to maintain publicly available geographic leak maps with leaks displayed by ZIP code or census tract. These are available through SoCalGas' website. SPD recommends continued approval of this practice.

We find it reasonable to approve full funding of \$911 for 2025 and \$926 for 2026 for this Best Practice in accord with our approval of this practice in SoCalGas Resolution G-3606.

Chapter 14: Aerial Methane Monitoring: \$0

Best Practices 16, 17, and 20a require the utilities to use enhanced methane detection practices such as aerial leak detection and more frequent surveys of leak-prone territory.

In AL 3285-G-A, SDG&E initially requested approximately \$6 million for its 2025-2026 Aerial Monitoring program. In its Comments on this Draft Resolution, SDG&E reduced its forecast to approximately \$4 million for the same two years. SPD finds that Aerial Methane Monitoring satisfies mandatory Best Practices more effectively than other proposed measures and recommends full approval of Chapter 14. However, SPD's evaluation finds that Aerial Monitoring does not achieve "break-even" net cost effectiveness, even when reductions to customer-side emissions are included. Rather, SPD states that Aerial Monitoring has a net cost effectiveness of \$313 per thousand cubic feet (MCF) when only utility-side emissions reductions are included and a net cost effectiveness of \$5/MCF when both utility and customer-side emissions reductions are included.

Public Utilities Code §975 specifies that the Commission shall "[p]rovide for the maximum technologically feasible and cost-effective avoidance, reduction, and repair of leaks and leaking components *in those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines* within a reasonable time after discovery. . ." (emphasis added). The consideration of emission reductions from infrastructure that is *not* part of SDG&E's transmission or distribution system is therefore beyond the scope of the CPUC's legislative mandate.

Given that the utility-side cost effectiveness of \$313/MCF is far above the break-even

³⁴ SDG&E Data Response, October 16, 2025 at 7.

level, we deny funding for this Best Practice. SDG&E did not have any incurred costs for 2025, as it delayed continuation of this practice due to uncertainty about its funding.

RD&D: \$112,668

SDG&E's RD&D program for leak abatement aims to improve estimates of system emissions and strategically reduce system emissions while considering operational efficiency and cost effectiveness. SDG&E initially requested \$1,290,000 in AL 3285-G-A for its 2025-2026 RD&D. In its Comments on this resolution, SDG&E requests revenue requirement of \$399,148 for 2025 and the same amount for 2026, for a total revenue requirement of \$798,296 in order to provide a "minimum maintenance" level of funding.

SDG&E incurred total revenue requirement costs of \$65,276 for RD&D through July 28, 2025. This total is equivalent to roughly \$9,389 per month. In order to provide funding for SDG&E to wrap up its RD&D projects, we approve that level of funding for the subsequent five months of 2025, for a total revenue requirement for 2025 of \$112,668.

Review of SDG&E's Program Administration Forecast for 2025-2026

Program Administration costs for the NGLA program include costs for reporting the various emission factors and their updates for each of the Best Practices and RD&D projects. The total Program Administration forecast for SDG&E's 2024 Compliance Plan is \$428,000. Consistent with D.17-06-015, SDG&E is authorized to book administrative expenses in a memorandum account to be reviewed in a future General Rate Case or other proceeding. These costs are thus not approved for recovery from ratepayers in this Resolution.

Requested Increase to Capital Revenue Requirement from Prior Compliance Periods

SDG&E also requests recovery in rates of unrecovered ongoing capital revenue requirement from their prior compliance plans dating back to its initial advice letter filed in 2017. SDG&E explains that this lack of recovery is the result of undercollection of and/or shortfalls to continuing capital revenue requirements associated with completed capital projects approved through prior NGLA compliance plans that were not fully accounted for in rates.³⁵ These costs are in addition to the revenue requirement requested for 2025 and 2026 in the 2024 Compliance Plan.

³⁵ AL 3285-G-A at 6.

SDG&E states that its Advice Letters 2852-G-C and 3071-G-B, which sought funding associated with its 2020 and 2022 NGLA Compliance plans, included rate impacts only for the two-year compliance periods of their associated compliance plans, not the ongoing capital requirements associated with previously approved projects. SDG&E proposes to include a total of \$222,000 for capital undercollections and shortfalls in its 2025 and 2026 rate recovery.

These under-recoveries occurred in part because SDG&E used its original NGLA Advice Letter, which was approved via Resolution G-3538 (October 11, 2018), as the model for subsequent Advice Letters. The original NGLA advice letter included only the two years included in the forecast of capital costs for the Compliance Plan period. That advice letter did not have any previously approved ongoing capital requirements to include, however, since it was the first one to be submitted for approval. Using this initial submittal as a model, the subsequent 2020 and 2022 two-year biennial Compliance Plans and Advice Letters repeated this approach.

We recognize that these costs are tied to projects and work that has been previously approved in prior NGLA resolutions and that they have not been recovered in rates. We treat the capital costs for this program the same as the revenue requirement associated with any other capital assets approved to be put into rates. This program was developed in compliance with SB 1371 and SB 1383 and has been implemented by decisions D.17-06-015 and D.19-08-020. Therefore, we approve SDG&E's revenue recovery of on-going capital requirements in the amount of \$222,000 to align with what has been approved and under-recovered in Resolutions G-3538 (October 11, 2018), G-3576, (December 17, 2020), and Resolution G-3595 (July 3, 2023). However, as noted in Resolution G-3538, balances in all accounts authorized for recovery are subject to audit verification and adjustment.

Future Costs for the NGLA Program

As noted above, the Commission requires funding for the NGLA program to be transitioned into the regular GRC process for each utility participating in the program. D.17-06-015 originally anticipated that each utility complying with the NGLA program would incorporate NGLA program expenses in its next general rate case,³⁶ but the CPUC's Executive Director granted SoCalGas and SDG&E an extension until their GRC

³⁶ See D.17-06-015, OP 12.

Test Year 2028 to incorporate NGLA program expenses, which is expected to be filed by May 15, 2026. SDG&E acknowledges this in AL 3285-G-A.³⁷

SDG&E is therefore directed to incorporate the NGLA program's costs in its next GRC proceeding and to incorporate NGLA expenses into its GRC applications or other application proceeding going forward. SDG&E shall submit its approved biennial NGLA compliance plans and SPD's evaluation thereof into the record of any GRC or other application proceeding in which recovery for costs associated with that compliance plan is sought.

For the year 2027, we approve a total revenue requirement of \$290,657 capped at the 2026 levels approved in this resolution consisting of \$23,019 for Recordkeeping/IT; \$266,712 for Damage Prevention/Public Awareness; and \$926 for Public Leak Maps pursuant to the process set forth in the discussion below on funding for 2027. SDG&E will still need to submit its biennial 2026 Compliance Plan to SPD, as required by D.17-06-015 and D.19-08-020. However, it need not submit an advice letter for funding as long as activities are maintained at the levels approved in this resolution.

COMMENTS/

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

Comments

³⁷ See AL 6277-G-B at 8 ("As directed in D.17-06-015 and D.19-08-020, and subsequently as granted by the Commission, future costs for the NGLA Program for SoCalGas will ultimately be incorporated into the TY 2028 GRC, anticipated to be filed May 15, 2026.")

SDG&E filed comments on July 31, 2025. No other party filed comments.

SDG&E's Comments are summarized with our conclusions as follows:

1. SDG&E states that the Draft Resolution should be revised to recover dollars spent for mandatory Best Practices from January 1, 2025 to July 28, 2025. SDG&E argues that it acted under the reasonable presumption that its expenses beyond the Compliance Period (which began January 1, 2025) to complete or maintain ongoing compliance at a reduced level would be funded. In addition, it maintained these practices at minimal levels for compliance. SDG&E therefore requests that the Draft Resolution be modified to include \$2,331,257 for expenses incurred from January 1, 2025 to July 28, 2025.

We find it reasonable to approve costs for continuation of the NGLA program during the first seven months of 2025 for the work SDG&E accomplished during that time. That work and the resulting benefits for ratepayers are described in the Discussion of Chapters and Measures Proposed by SDG&E section of this resolution.. The following activities are approved for funding from January 1, 2025, through July 28, 2025: Increased Leak Survey, Blowdown Reduction Activities, Electronic Leak Survey, Pipe Fitting Specifications, and Gas Speciation.

2. SDG&E states that the Draft Resolution legally errs in denying funding requests to comply with the 26 mandatory Best Practices. SDG&E attests legal error because SB 1371 specifically mandates the CPUC to implement Best Practices for leak-related work. PUC § 975(e) requires the CPUC to establish rules and procedures including “the use of best practices for leaks surveys, patrols, leak survey technology, leak prevention, and leak reduction”³⁸ SDG&E asserts this requirement is not subject to the CPUC's discretionary enforcement because the legislature prescribed that the “rules and procedures adopted pursuant to [PUC § 975 (d)] shall accomplish” these dictates.³⁹ The Commission issued D.17-06-015 in response to SB 1371 and PUC § 975 (e) requirements, and SDG&E's 2024 Compliance Plan was developed with measures to comply with these mandatory Best Practices. If all projects are halted, SDG&E claims it will be non-compliant with nine of the mandatory Best Practices.

³⁸ PUC § 975 (e) (4).

³⁹ Ibid.

Additionally, SDG&E asserts that if funding for 2025, 2026, and 2027 is entirely denied, it will need additional funding and multiple years to bring the emissions reductions back to 2024 levels, which would be a wasted investment to ratepayers who have funded the program in rates for the last 10 years.

We find it reasonable to approve some funding for leak-related work in a way similar to what was approved in SoCalGas Resolution G-3605.

3. SDG&E claims the Draft Resolution factually errs in denying funding requests associated with its 2024 NGLA Compliance Plan and suggesting that SDG&E propose measures in the 2028 GRC. SDG&E attests this is factual error because the CPUC previously approved delaying integration of the NGLA program costs into the GRC until SDG&E's TY 2028 GRC and stated that SDG&E should file advice letters for recovery of NGLA costs until the 2028 GRC application.⁴⁰ Due to this extension, SDG&E did not include NGLA costs in its TY 2024 GRC Application. If funding is halted until 2028, SDG&E attests it will cause higher overall spending to bring projects back to their 2024 levels and would be inconsistent with CPUC guidance.

We find it reasonable to provide some funding for all chapters; partial, ongoing funding for Damage Prevention Public Awareness; and full funding for Recordkeeping IT Project and Public Leak Maps.

4. SDG&E argues that the Draft Resolution legally errs in applying a cost-effective benchmark to ongoing measures that were already approved in prior compliance plans. SDG&E maintains this is legal error because the Commission specifically stated the compliance plans are not required to be cost-effective: "[W]e do not adopt a requirement that all measures, or the Compliance Plans in entirety, must show a positive benefit to cost ratio..."⁴¹

SDG&E also notes that the eight chapters in its 2024 Compliance Plan are not new and contain measures that were approved in previous Compliance Plans and in SPD's Evaluation of SDG&E's 2024 Compliance Plan (SPD Evaluation). If they are

⁴⁰ November 18, 2021 Letter to Joe Mock, Director of regulatory affairs from CPUC Executive Director Rachel Peterson granting an extension of time for SoCalGas and SDG&E to file their NGLA cost forecasts from 2024 GRC to 2028 GRC and to file Tier 3 ALs until the 2028 GRC, expected to be filed May 15, 2026.

⁴¹ D.19-08-020 at 39.

halted, significant ratepayer investment over previous NGLA years will have been wasted.

SDG&E adds that it is legal error to apply a cost-effectiveness metric to Best Practices ordered in D.17-06-015 that are necessary for tracking the efficacy of the overall program and specific practices for public safety and information purposes, which are intended to track and inform the methane abatement of other Best Practices. In addition, SDG&E claims it is legal error that the Draft Resolution focuses only on cost-effectiveness, whereas PUC § 975 (b) requires the Commission to give priority to safety, reliability, and affordability in establishing a leak abatement program. In addition, D.19-08-020 allows for consideration of qualitative factors and policy goals when evaluating potential compliance measures necessary for Best Practices.⁴²

We find that the CPUC has discretion to balance cost-effectiveness, particularly given affordability concerns, with safety and reliability and the need to track the performance and progress of the leak abatement program over time. Therefore, we disapprove funding for measures that are not necessary for compliance with safety standards, but approve some funding for the following chapters in order to track progress on methane abatement and provide information to the public: Recordkeeping IT, Damage Prevention Public Awareness, and Public Leak Maps.

5. SDG&E claims legal error that the Draft Resolution denies funding for programs that SPD approved. SDG&E points to D.17-06-015 delegating to SPD the “authority to approve biennial compliance plans and disapprove any project it determines is not in the ratepayer’s interest.”⁴³ SDG&E argues that the CPUC has not issued a decision modifying D.19-08-020 to withdraw such delegated authority to SPD, and therefore the programs SPD approved in SDG&E 2024 NGLA Evaluation should also be approved by the Commission because SPD has been delegated that authority by the Commission.

While our decisions on the NGLA program delegated authority to SPD to approve measures in a compliance plan necessary for compliance with mandated Best Practices, they also require utilities to seek Commission approval for all NGLA program expenditures through a Tier 3 advice letter to be approved by Commission Resolution. Thus, the CPUC retains ultimate discretionary authority

⁴² Ibid at 2.

⁴³ Ibid at 19.

to approve or deny NGLA program costs based on our determination of what is in the best interest of ratepayers.

6. SDG&E's Comments on denial of funding for specific chapters:

Chapter 1: Increased Leak Survey: SDG&E states that the Draft Resolution's denial of funding for Chapter 1 will result in SDG&E ceasing to conduct accelerated surveys on its vintage steel, plastic, and protected steel distribution lines as required by D.17-06-015's mandatory Best Practices 15 and 16. Best Practice 15 requires SDG&E to conduct distribution leak surveys every three years in areas where GO 112-F requires five-year surveys. Best Practice 16 requires SDG&E to conduct special leak surveys on specific parts of the transmission and distribution systems with known risks for leaks. SDG&E's Aerial Monitoring program in Chapter 14 was developed to respond to the requirements of Best Practices 15 and 16 and, as SPD notes, is more cost-effective than ground-based leak surveying. SPD does not approve continuation of Increased Leak Survey chapter assuming Aerial Monitoring Chapter 14 is adopted; conversely, if Chapter 14 is not adopted, SPD recommends Chapter 1, Increased Leak Survey, should continue.⁴⁴

SDG&E asserts it is able to decelerate its surveys quickly and requests funding for costs incurred for this practice between January 1, 2025 and July 28, 2025, with a 2025 revenue requirement of \$1,253,842⁴⁵ and no revenue requirement for 2026 and thereafter. We approve a revenue requirement of \$1,253,842 for 2025.

Chapter 2: Blowdown Reduction Activities: SDG&E asserts the Draft Resolution's denial of funding for Chapter 2, Blowdown Reduction Activities (Blowdown Reduction) is legal error because it supports compliance with D.17-06-015 mandatory Best Practice 23. Best Practice requires utilities to reduce blowdown emissions as much as operationally feasible, and SDG&E's Chapter 2 activities are in response to this requirement. In addition, SDG&E did not request funding for this program in the GRC. SDG&E requests funding for a total revenue requirement of \$788,913 to keep this program at a minimum maintenance level.

Unlike SoCalGas's Blowdown program, SDG&E's Blowdown activities are not

⁴⁴ SPD Evaluation of SDG&E 2024 Compliance Plan at 9.

⁴⁵ SDG&E Comments, July 14, 2025, Attachment 2.

cost-effective, and therefore we do not approve SDG&E's request for full funding. However, we find it reasonable to approve funding for costs of \$163,827 incurred between January 1 and July 28, 2025.

Chapter 4: Record Keeping IT Projects: SDG&E maintains that the Draft Resolution's denial of funding is legal error because D.17-06-015 Best Practice 9 requires each gas utility to maintain records, data, calculations and assumptions associated with emissions reporting and that this program is critical for regulatory audits to ensure compliance. Further, the utility did not request funding for this work in its 2024 GRC. SDG&E requests a revenue requirement of \$175,525 in 2025 and \$23,019 in 2026, with a TRR of \$198,554 to maintain minimum compliance for this practice.⁴⁶

We find it reasonable to approve recovery of the cost of SDG&E's recordkeeping IT as ordered in D.17-06-015 as it is necessary to audit the program's performance in reducing emissions and to ensure compliance with D.17-06-015. We approve a revenue requirement of \$175,525 for 2025 and \$23,019 for 2026, for a total revenue requirement of \$198,554. This is in accord with SoCalGas Resolution G-3605 and is reasonable as compared to SDG&E's initial request of \$412,000 as amended in AL 3285-G-A.

Chapter 6, Electronic Leak Survey: SDG&E asserts that the denial of funding for this chapter in Draft Resolution G-3606 is legal error because: 1) such advancements in survey methodologies were required in D.17-06-015; 2) SDG&E did not request funding for this practice in their 2024 GRC; and 3) ceasing funding now would risk losing the safety and operational benefits that have been built over the last six years of funding.

We do not find it reasonable to continue to approve this practice, in accord with our denial in SoCalGas Resolution G-3605. We do, however, approve funding of SDG&E's incurred costs (January 1, 2025 – July 28, 2025) of \$333,984.

Chapter 7: Damage Prevention Public Awareness: SDG&E asserts the Draft Resolution's denial of funding is legal error because this "Call 811 Before You Dig" public education program was developed in response to Best Practice 24 in D.17-06-015. In addition, SDG&E notes SB 1371 mandates the CPUC to give priority to safety, reliability, and affordability in establishing the leak abatement

⁴⁶ Ibid.

program. SDG&E maintains the Draft Resolution errs in only considering cost-effectiveness and not these other attributes that provide benefits to customers, such as reduced costs from damages for which SDG&E may be financially liable. SDG&E states annual third-party excavation damages have decreased by 22 percent since this program was implemented in 2019. SDG&E requests a revenue requirement of \$936,456 in 2025 and \$951,237 in 2026, with a TRR of \$1,887,693 for this practice.

We note that SDG&E requests significantly more funding for this item than the \$286,831 we approved for SoCalGas in Resolution G-3605 with its much larger service territory. We therefore find it reasonable to approve a total revenue requirement for 2025 of \$266,712, which is based on costs incurred through July 28, 2025, and the same amount for 2026, for a total revenue requirement for the two years of \$533,424.

Chapter 8: Pipe Fitting Specifications: SDG&E repeats its assertions in its Comments regarding other chapters that Draft Resolution G-3606's denial of funding for this chapter is legal error, because: 1) such advancements in survey methodologies were required in D.17-06-015; 2) SB 1371 requires the CPUC to give priority to safety, reliability, and affordability, and not just cost-effectiveness; and 3) denial would waste prior investments by ratepayers in this practice.

We do not find it reasonable to continue to approve this practice in accord with our denial of this practice in SoCalGas Resolution G-3605. We do, however, approve funding of SDG&E's incurred costs (January 1, 2025 – July 28, 2025) of \$864.

Chapter 10: Gas Speciation: SDG&E asserts that the denial of this Best Practice in Draft Resolution G-3606 is legal error. In addition, SDG&E asserts that because this chapter enables SDG&E to investigate and repair leaks more promptly, it provides safety and reliability benefits to customers.

We do not find it reasonable to continue to approve this practice as it is not in accord with our denial of this practice in SoCalGas Resolution G-3605. We do, however, approve funding of SDG&E's incurred costs (January 1, 2025 – July 28, 2025) of \$80,566.

Chapter 14: Aerial Monitoring: SDG&E asserts that denial of funding for this

Best Practice will result in increased emissions from SDG&E's infrastructure, increased emissions from customer infrastructure, and fewer safety enhancements for customers, further amplified by denial of continued funding for Chapter 1, Increased Leak Survey. In addition to asserting legal error, SDG&E adds that this practice is not new and is thus not subject to the cost-effectiveness benchmark. SDG&E further quotes from SPD's 2022 Evaluation, in which SPD notes the program's greenhouse gas reduction and safety benefits.⁴⁷

SDG&E notes that in addition to its biennial Compliance Plan submittals, it has prepared numerous reports on its Aerial Monitoring practice containing findings and estimated emissions reductions from specific geographic areas in greater granular detail than has been available before.⁴⁸ These more granular emissions estimates have allowed SDG&E to estimate that customers in disadvantaged communities would benefit substantially from the identification of methane leaks in their area, both in terms of improved air quality and financial benefits from mitigated cases of leaks and incomplete combustion. Specifically, SDG&E estimates the proposed 2026 scope of this chapter will save customers more than \$120,000 due to mitigated leak emissions and more than \$10,000 due to mitigated cases of incomplete combustion.⁴⁹ SDG&E asserts that, because SPD is delegated authority by D.19-08-020 to approve/disapprove specific practices in biennial Compliance Plans, it is legal error to deny funding for a chapter that SPD approved in full.

As noted above, we find that the CPUC has discretion to balance cost-effectiveness, particularly given current affordability concerns. In accord with SoCalGas Resolution G-3605, we do not find it reasonable to continue to approve this practice. In SDG&E's case, Aerial Monitoring is not cost effective even when customer-side emissions reductions are included. While SPD recommends approval of this program, considering the Governor's recent mandate in Executive Order N-5-24 to focus on the costs and benefits of the programs we oversee, we cannot continue to approve a program that is so cost-ineffective, despite its other benefits.

⁴⁷ Attachment A of Resolution G-3599 at 12.

⁴⁸ These included presentations at the 2023 Winter Workshop, an Aerial Monitoring RD&D report in Q1 2023, estimated emission reductions and cost-effectiveness reports on the practice and a subsequent report in Q1 2025.

⁴⁹ SDG&E July 31, 2025 Comments at 11.

FINDINGS AND CONCLUSIONS

1. On September 1, 2014, Senate Bill (SB) 1371 (Leno), codified in Public Utilities Code § 975 et seq. was signed into law, authorizing the California Public Utilities Commission (CPUC) to adopt rules and procedures to reduce emissions of natural gas from CPUC-regulated gas facilities to the maximum extent feasible while giving due consideration to costs.
2. SB 1371 requires that affordability be a priority of the emissions reduction program.
3. Public Utilities Code section 975(e)(1) requires approval of emissions reduction measures that are both cost-effective and technologically feasible.
4. On September 19, 2016, SB 1383 (Lara) was signed into law, requiring the California Air Resources Board, in coordination with other state and local agencies, to approve and begin implementing a comprehensive strategy by January 1, 2018, to reduce methane emissions by 40 percent by 2030.
5. Decisions (D.) 17-06-015 and D.19-08-020 ordered ratemaking forecasts for the Natural Gas Leak Abatement Program (NGLA) to be submitted in Tier 3 Advice Letters, which require approval via CPUC resolutions.
6. D.17-06-015 required SDG&E to establish a two-way balancing account for incremental NGLA program expenditures related to Best Practices in the form of a subaccount to its New Environmental Regulatory Balancing Account (NERBA), and to create a one-way balancing account for the costs of the NGLA program's Research, Development and Demonstration (RD&D) activities.
7. D.17-06-015 required SDG&E to create a Memorandum Account for incremental administrative costs associated with the Natural Gas Leak Abatement Program expenditures.
8. Ordering Paragraph 12 of D.17-06-015 provides that the ratemaking forecasts and caps that the CPUC approves in response to the Tier 3 ALs shall apply until the NGLA is incorporated into each utility's next General Rate Case or other gas ratemaking proceeding.
9. On August 15, 2019, the CPUC adopted a Second Phase Decision, D.19-08-020, establishing additional policies. The Decision also imposed a restriction on rate recovery for Lost and Unaccounted For (LUAF) gas beginning in 2025 for SoCalGas and Pacific Gas & Electric (PG&E) if their methane emissions are not greater than 20 percent below the 2015 baseline levels. This performance objective reflects the CPUC's intent that SoCalGas and PG&E be at least halfway to achieving their share of the state's goal of a 40 percent

- reduction in methane emissions by 2030, consistent with SB 1383, while noting that the 40 percent reduction is a soft target.
10. SDG&E was not subject to the restriction on rate recovery for not achieving the 20 percent reduction in methane emissions by 2025 because its system is much newer and therefore has fewer leaks and emissions to reduce.
 11. D.19-08-020 required the use of a standard cost effectiveness methodology and two additional cost-benefit analyses that calculate the benefit of avoided Cap and Trade compliance costs and the benefit of the avoided Social Cost of Methane.
 12. The avoided Cap and Trade costs and the avoided Social Cost of Methane tests are to be used for information and comparison purposes.
 13. D.07-06-015 and D.19-08-020 authorize SPD to approve biennial compliance plans and disapprove any project it deems not in ratepayers' interest.
 14. On July 31, 2018, SDG&E filed AL 2621-G-B, which was approved with modifications in Resolution G-3538 on October 11, 2018.
 15. On December 17, 2020, the CPUC issued Resolution (R.) G-3577 approving AL 2852-G cost forecasts for the SDG&E 2020 Compliance Plan for a Total Revenue Requirement of \$15.8 million over the life of the capital projects. This resulted in an overall rate increase of 0.7 percent for 2021 and 0.3 percent in 2022.
 16. On November 18, 2021, the CPUC's Executive Director granted SDG&E an extension of time to comply with OP 12 of D.17-06-015, delaying the inclusion of SDG&E's leak abatement programs in the GRC until Test Year 2028, which is expected to be filed by May 15, 2026.
 17. On March 15, 2022, SDG&E submitted its 2023 NGLA Compliance Plan and AL 3071-G, requesting approval for the forecasted costs of the plan, which were subsequently revised and corrected in AL 3071-G-A and AL 3071-G-B.
 18. On June 29, 2023, the CPUC issued Resolution G-3599, partially approving AL 3071-G-B, authorizing funding of \$19,265,211, representing a reduction of approximately 21 percent from SDG&E's funding request.
 19. On March 15, 2024, SDG&E submitted its 2024 NGLA Compliance Plan along with AL 3285-G requesting recovery of its forecasted costs for the Plan.
 20. On October 22, 2024, Safety Policy Division issued a letter to SDG&E: "Approval of Adjusted 2015 Baseline Emissions for San Diego Gas & Electric Company," which adjusted the 2015 emissions baseline from 284,762 MCF to 285,355 MCF.

21. With the adoption of the adjusted baseline, SPD observes that SDG&E has reported an estimated 8 percent reduction in emissions by the end of 2023.
22. On November 5, 2024, SDG&E submitted AL 3285-G-A to correct inadvertent errors and a typo.
23. In accordance with D.19-08-020, SPD approval of utility Compliance Plans is based on consideration of mandatory Best Practices, forecasted emission reductions, and cost-effectiveness. D.19-08-020 does not establish cost-effectiveness as the sole consideration, nor does it establish a cost-effectiveness threshold.
24. Safety Policy Division has evaluated SDG&E's 2024 Compliance Plan's Best Practices and Research, Development, and Demonstration (RD&D) projects and approved all chapters but one and RD&D as being in compliance with D.17-06-015 and D.19-08-020.
25. This Resolution approves the cost forecast for two of SDG&E's Best Practices as described in its Compliance Plan and AL 3285-G-A: Recordkeeping/IT and Public Leak Maps.
26. This Resolution approves incurred funding for January 1, 2025, through July 28, 2025 for five of SDG&E's Best Practices: Increased Leak Survey; Blowdown Reduction Activities; Electronic Leak Survey; Pipe Fitting Specifications; and Gas Speciation.
27. This Resolution approves a total revenue requirement of \$266,712 per year for Damage Prevention Public Awareness, for a total revenue requirement of \$533,424 over the two-year period.
28. This Resolution does not approve funding for Chapter 14: Aerial Mapping and Monitoring.
29. This Resolution approves \$112,668 in 2025 funding for SDG&E's NGLA Research, Development, and Demonstration projects.
30. SDG&E is required to incorporate the NGLA into its GRC for Test Year 2028 by Ordering Paragraph 12 of D.17-06-015, and the letter from the CPUC's executive director dated November 18, 2021.
31. SDG&E may move its NGLA Research, Development and Demonstration projects as appropriate to its broader Research and Development program in its next GRC pursuant to Public Utilities Section 740.1 or other process as may be specified by the Commission.
32. In accordance with D.17-06-015, the program administration costs recorded in the Natural Gas Leak Abatement Program Memo Account are subject to

- reasonableness review in SDG&E's next GRC or other application. They are thus not approved for recovery in this Resolution.
33. SDG&E requests modifications to recover on-going capital revenue requirements of \$113,000 for 2025 and \$109,000 for 2026 for a total revenue requirement of \$222,000.
34. It is reasonable for SDG&E to recover the ongoing capital costs associated with measures approved in prior compliance plans.
35. It is reasonable for SDG&E to modify its rates to collect the revenue requirement approved in this resolution.

THEREFORE IT IS ORDERED THAT:

1. Forecasted total revenue requirement costs of \$200,391 for two Best Practices including Recordkeeping/IT and Public Leak Maps as filed in Advice Letter 3285-G-A for San Diego Gas & Electric Company's (SDG&E) 2024 Natural Gas Leak Abatement Program (NGLA) for 2025 and 2026 are approved.
2. Total revenue requirement of \$1,833,083 incurred from January 1, 2025 through July 28, 2025, for five Best Practices including Increased Leak Survey, Blowdown Reduction Activities, Electronic Leak Survey, Pipe Fitting Specifications, and Gas Speciation are approved.
3. Total revenue requirement of \$266,712 per year for Damage Prevention Public Awareness, for a total revenue requirement of \$533,424 over the two-year period, is approved.
4. Forecasted costs for Aerial Methane Monitoring are denied.
5. Recovery of \$222,000 in on-going capital requirements from previously approved Advice Letters is approved.
6. Total revenue requirement of \$112,668 for NGLA Research, Development, and Demonstration projects in 2025 are approved.
7. SDG&E is authorized to record up to \$0.428 million for NGLA Program Administration in the Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA) for potential recovery in a future general rate case or other proceeding, where it will be subject to reasonableness review.

8. Going forward, SDG&E shall incorporate its NGLA program expenses and biennial NGLA compliance plans into the record of any GRC or other application proceeding in which recovery for costs associated with that compliance plan is sought.
9. SDG&E shall cap its 2027 funding for the Best Practices approved in this Resolution to the funding level approved for 2026: \$290,657.
10. SDG&E must submit a 2026 Compliance Plan for 2027 and 2028.
11. Submittal of an advice letter for 2027 is not required so long as costs do not exceed the levels approved in this resolution
12. SDG&E shall update its rates for the approved revenue requirement in Resolution G-3606 within 30 days upon issuance of this resolution via a Tier 1 Advice Letter.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on October 30, 2025; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated October 30, 2025, at Sacramento, California.