Docket:	A.25-07-001
Exhibit Number:	
Commissioner:	Karen Douglas
Admin. Law Judge:	Shannon Clark
Witness:	Andy Zhang

PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

Opening Testimony
on
Application of Southern California Gas Company (U 904 G), on Behalf of Customers, for Approval of Gas Line Extension Allowances

Application 25-07-001

San Francisco, California
November 14, 2025

587343966

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CHAPTER 1 D.22-09-026 Minimum Project Requirements

(**Witness**: Andy Zhang)

I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this opening testimony in the *Application of Southern California Gas Company (U 904 G), on Behalf of its Customers, for Approval of Gas Line Extension Allowances* (Application), filed July 1, 2025.[1] In its Application, Southern California Gas Company (SCG) requests that the Commission approve gas line extension subsidies for nine[2] customer projects which will exclusively install compressed natural gas refueling stations.[3] In total, SCG requests $6.656 million in allowances be approved for these projects, resulting in $14.9 million in associated revenue requirement over the useful life of the project assets.[4] Decision (D.) 22-09-026 phased out natural gas line extension subsidies but allows the gas utilities to submit an application on behalf of customers seeking exemptions to the policy by July 1 of each year, starting in 2023.[5] D.22-09-026 also sets three minimum criteria that projects seeking an exemption must achieve in order for the Commission to consider granting the subsidy, namely a demonstrable reduction in greenhouse gases, alignment with California's climate goals, and a demonstration that there are no feasible alternatives to the use of natural gas.[6] This testimony assesses the proposed projects' fulfillment of the minimum criteria from D.22-09-026.

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[1] Application (A.) 25-07-001, *Application of Southern California Gas Company (U 904 G), on Behalf of its Customers, for Approval of Gas Line Extension Allowances* (Application), filed July 1, 2025.

[2] SCG states that the applicant for Project F cancelled their project. Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 2, at 2.

[3] Application at 1.

[4] Application at 3-4.

[5] Decision (D.) 22-09-026, *Phase III Decision Eliminating Gas Line Extension Allowances, Ten-Year Refundable Payment Option, and Fifty Percent Discount Payment Option Under Gas Line Extension Rules,* Ordering Paragraph (OP) 1-2 at 81-82.

[6] D.22-09-026, OP 2 at 82.

II. SUMMARY OF RECOMMENDATIONS

The Commission should deny gas line extension subsidies for Projects A, C, D, E, F[7], G, and H. The projects fail to demonstrate a reduction in GHGs, alignment with California's climate goals, or that there are no feasible alternatives to the use of natural gas.

III. DISCUSSION

A. The Projects Do Not Meet D.22-09-026 Minimum Requirements

The Commission should deny gas line extension subsidies for Projects A, C, D, E, F[8], G, and H because they do not meet the criteria set out in D.22-09-026. D.22-09-026 requires, at minimum, that the projects demonstrate a reduction in greenhouse gas (GHG) emissions, align with California's climate goals, and demonstrate that there are no feasible alternatives to the use of natural gas.[9] While SCG claims that all nine projects submitted in the Application meet the minimum criteria established by D.22-09-026,[10] SCG does not provide adequate evidence to support this claim. In fact, the projects' compliance claims are largely speculative and also dependent on many factors that SCG has not verified. Therefore, the Commission should reject gas line extension subsidies for the above-described projects because:

- There is insufficient evidence to demonstrate that the projects will lead to a reduction in GHGs;
- The projects do not align with California's climate goals; and
- There is insufficient evidence to demonstrate that there are no feasible natural gas alternatives for the projects.

[7] SCG states that the applicant for Project F cancelled their project. Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 2, at 2.

[8] SCG states that the applicant for Project F cancelled their project. Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 2, at 2.

[9] D.22-09-026, OP 2 at 82.

[10] Application at 3.

1. SCG does not demonstrate that these projects will lead to a reduction in GHGs.

D.22-09-026 requires that projects requesting gas line extension subsidies show a demonstrable reduction in greenhouse gas emissions.[11] SCG provides unsubstantiated estimates that the projects will achieve 177,591 metric tons of annual GHG reduction, using 6,718,435 therms of RNG to replace diesel consumption.[12] SCG merely asserts that its estimate is reasonable, and fails to provide adequate evidence or analysis to support the claimed GHG reductions. In fact, the purported GHG savings in the Application are not verifiable because they are dependent on customers' claims that the projects will use renewable natural gas (RNG) as a fuel replacement for diesel in compressed natural gas (CNG) vehicles.[13] However, achieving these GHG reductions requires that the annual forecasted consumption of RNG is accurate and that the customers are able to reliably procure the necessary minimum quantity of RNG every year. To comply with D.22-09-026, SCG must provide qualitative and quantitative evidence addressing these two factors. However, since SCG does not provide adequate evidence, it has failed to demonstrate that these projects will lead to GHG reductions.

The stated GHG reductions are only achievable if customer applicants' estimates of annual RNG consumption are accurate, because the GHG reductions are entirely dependent on the volume of diesel displaced by RNG. The method SCG uses to calculate GHG reductions compares the difference in carbon intensity between RNG and the displaced diesel.[14] These are volumetric comparisons, meaning that there will be greater carbon emissions reductions for each incremental amount of displaced diesel. Thus, any miscalculation of the amount of displaced diesel will result in lower GHG reductions than

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[11] D.22-09-026, OP 2 at 82.

[12] *Workpapers Supporting the Prepared Direct Testimony of Jason Legner* (SCG Chapter 2 Testimony Workpapers), at 1.

[13] *Prepared Direct Testimony of Jason Legner on Behalf of Southern California Gas Company* (SCG Chapter 2 Testimony), at 7; 9; 10; 12-13; 14; 15; 16-17; 18.

[14] SCG Chapter 2 Testimony at 2-3.

predicted. Instead of providing quantitative evidence to demonstrate that the displaced diesel calculations are correct, the Application relies on customer attestations.[15] Considering that no further evidence was provided, it is impossible to verify customers' claims. SCG admits that "additional evidence was not provided" to verify customer estimates.[16] This demonstrates a lack of due diligence in verification of the GHG reduction calculation.

Several of the projects involve public compressed gas refueling stations that, as SCG admits, possess an "inherent level of uncertainty regarding customer volume and consumption patterns."[17] The Application therefore likely miscalculates RNG usage, and thus, GHG reductions. Since customers' annual RNG consumption estimates are not supported with evidence, claimed GHG reductions are largely speculative. Therefore, the Commission should deny the Applications.

In addition, the customers must secure an adequate supply of low-carbon RNG to achieve the GHG reductions purported by SCG. Under SCG's GHG reduction calculation method, carbon emissions intensities are selected from the California Air Resource Board's low-carbon fuel standard (LCFS), which estimates that diesel has a carbon intensity of 100.45 gCO_2e/MJ, and Bio-CNG has a carbon intensity of -187.09 gCO_2e/MJ.[18] The Application concludes that the projects will achieve GHG reductions because bio-CNG/RNG have a lower carbon intensity than standard diesel.[19] However, this presumes that customers are able to acquire 6.7M therms of RNG with the low carbon intensity described in the Application. Furthermore, SCG states that they do not

[15] Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 5, at 5. "Each customer provided their estimated annual energy use in their submitted application provided in the Chapter 2 Testimony workpapers."

[16] Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 5(a), at 5.

[17] Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 2, at 2.

[18] SCG Chapter 2 Testimony at 2-3.

[19] SCG Chapter 2 Testimony at 2-4.

plan to verify the carbon emissions intensity of the fuel used by the projects after the 36-month post-installation period.[20]

If customers are unable to procure an adequate low-carbon RNG source, the projects' GHG emissions will be higher, either because the vehicles may need to use fossil gas or because the procured RNG will have a higher carbon intensity than -187.09 gCO_2e/MJ. The carbon intensity calculated by SCG for RNG is an average for California produced bio-CNG, and the natural gas procured by customers in this Application may not have the same low carbon intensity. In fact, SCG admits that bio-CNG has a carbon intensity range from -532.74 to 84.83 gCO_2e/MJ, depending on the source of the RNG.[21] There is no evidence to indicate that the customers will procure RNG from a low-carbon source, and SCG states that it does not know the status of customers' procurement of RNG.[22]

Finally, the application provides no evidence that projects will be able to acquire an adequate volume of RNG. If customers are unable to secure the necessary volumes of RNG, they may instead fuel the trucks using fossil CNG, which is not low carbon.[23] Therefore, it is likely that GHG emissions are much higher than SCG claims.

Given the lack of supporting evidence, SCG has not proven that the GHG reductions calculated in the Application are achievable. Thus, SCG fails to comply with the criteria for exemption established in D.22-09-026.

[20] Attachment 3, SCG Response to Data Request CAL ADVOCATES-AZ-2025-06, Question 1(b), at 1.

[21] SCG Chapter 2 Testimony at 3.

[22] Attachment 1, SCG Response to Data Request CAL ADVOCATES-AZ-2025-04, Question 4, at 4.

[23] Fossil CNG has a CI of 81.18 gCO_2e/MJ, Data derived from amended CARB LCFS regulation as of June 27, 2025, Table 7-1, available at: https://ww2.arb.ca.gov/sites/default/files/2025-08/2025_lcfs_fro_oal-approved_unofficial_08112025.pdf.

2. The projects do not align with California's climate goals.

D.22-09-026 also requires that proposed projects align with California's climate goals.[24] The projects do not align with California's climate goals because they do not contain a plan to eventually incorporate the use of zero-emissions technologies.[25] California first committed to zero-emissions technologies, such as battery-electric vehicles, in Executive Order N-79-20 and reaffirmed this commitment more recently in Executive Order N-27-25.[26] These Executive Orders clearly convey that the state's support of zero-emissions technologies includes "passenger, medium- and heavy-duty vehicles."[27] The compressed gas trucks proposed in this Application do not align with this order because they still burn natural gas and are not zero-emission vehicles. Customers wishing to use compressed gas vehicles should, at minimum, propose timelines to retire natural gas equipment, since Executive Order N-79-20 sets a goal to achieve 100 percent zero emissions trucks by 2045.[28] However, the projects in this Application do not demonstrate how they plan to align with state-policy on zero emissions vehicles. Therefore, the projects in the Application do not comply with the D.22-09-026 requirement that projects must align with California's climate goals. Therefore, the Commission should reject the Application.

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[24] D.22-09-026, OP 2(b) at 82.

[25] The project applicants do not mention a plan to transition to zero-emissions technology. The applicants merely state that zero-emissions alternatives are not currently viable. SCG Chapter 2 Testimony at 6; 8; 11; 13; 15; 16; 17; 19.

[26] Executive Order N-79-20, Gavin Newsom, 9/20/20. Available at: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf; Executive Order N-27-25, Gavin Newsom, 6/12/25, at 2. Available at: https://www.gov.ca.gov/wp-content/uploads/2025/06/CRA-Response-EO-N-27-25_-bl-formatted-GGN-Signed-6-11-954pmFinal.pdf.

[27] Executive Order N-27-25 at 2.

[28] Executive Order N-79-20 at 2.

3. The Application does not demonstrate that there are no feasible alternatives to the use of natural gas.

SCG does not provide adequate evidence to demonstrate that there are no feasible alternatives to the use of natural gas. In D.22-09-026, the Commission specifically stated that projects need to demonstrate that there are no feasible alternatives to natural gas, "including electrification."[29] SCG did not verify that other technologies are inadequate and instead relies mostly on customer attestations.[30] Customer attestations alone are insufficient to prove there are no feasible alternatives to the use of natural gas. While some customers provide plausible reasons, such as electric vehicles' effective range, a mere statement that there are no feasible alternatives is inadequate. Customers must provide data that supports their assertions that electric vehicles are infeasible. The projects do not provide adequate evidence to substantiate their claims. The chart below lists the customers' explanations and contrasts them to what would constitute reasonable supporting evidence for these claims:

Table 1: Applicant Explanations for No Feasible Alternatives

Project	Customer explanation for no feasible alternatives	Missing evidence needed to support customer explanations
Project A	• "The customer's application states that there are no feasible or viable technological alternative to an RNG fueling station for the operation of their business."[31]	• N/A. No evidence customer considered any other options.

[29] D.22-09-026, OP 2(c) at 82.

[30] SCG Chapter 2 Testimony at 6.

[31] SCG Chapter 2 Testimony at 8.

Project C	• "The customer states that electric vehicle (EV) trucks lack the range necessary to accommodate the necessary routes. It also states that hydrogen infrastructure and trucks are not sufficiently developed for it to commit to fuel cell vehicle technology"[32]	• Data on the range necessary to complete routes. • Data on the EV trucks that were explored/tested.
Project D	• "The customer has investigated both Hydrogen Fuel Cell and EV alternatives and has ruled them out as 1) there are no Hydrogen Fuel Cell refuse collection trucks currently on the market, and 2) the EV options offer limited range stemming from high ancillary hydraulic loads required to lift and compact the refuse."[33]	• Data on the range necessary for business operations. • Data on the EV trucks that were explored/tested.
Project E	• "It emphasized that Battery EVs and Fuel Cell EVs are not yet feasible for heavy-duty trucking due to high upfront costs, limited infrastructure, restricted range, and extended refueling times."[34]	• Data on the range necessary to operate. • Data on the EV trucks that were explored/tested. • Data on sufficient refueling times. • Data on relative costs (EV vs. CNG)

[32] SCG Chapter 2 Testimony at 11.

[33] SCG Chapter 2 Testimony at 13.

[34] SCG Chapter 2 Testimony at 15.

Project F[35]	• "The proposed station will serve to fuel the customer's existing fleet of CNG vehicles and allow them to increase their adoption of RNG trucks, therefore there is no alternative fuel solution available to meet the needs of these vehicles."[36]	• N/A. No evidence customer considered any other options.
Project G	• "This project is designed to specifically serve public RNG vehicles, therefore there is no other technological solution, or fuel can serve this function."[37]	• N/A. No evidence customer considered any other options.
Project H	• "This project will serve as a public fueling station for heavy duty RNG vehicles. As such, there exists no fueling alternative that could be installed at this location to serve this purpose."[38]	• N/A. No evidence customer considered any other options.

Without the additional supporting evidence described in the table above, it is not possible to determine if electric alternatives are feasible.

Additionally, replacing diesel trucks with compressed gas trucks that use RNG is not the only way to lower emissions for heavy-duty trucking. In fact, if customers are unable to procure an adequate supply of low-carbon RNG, keeping diesel trucks and using renewable diesel may lower carbon emissions without expending ratepayer funds.

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[35] SCG states that the applicant for Project F cancelled their project. Attachment 2, SCG Response to Data Request CAL ADVOCATES-AZ-2025-05, Question 2, at 2.

[36] SCG Chapter 2 Testimony at 16.

[37] SCG Chapter 2 Testimony at 17.

[38] SCG Chapter 2 Testimony at 19.

Renewable diesel has a lower carbon intensity than fossil-CNG, 42.1 $gCO2_e$/MJ[39] versus 81.18 gCO_2e/MJ,[40] respectively. Therefore, if customers use fossil gas because they are unable to procure low-carbon RNG, these projects will increase carbon emissions relative to using renewable diesel. In fact, one customer states that they would use renewable diesel if natural gas equipment were not available.[41] The projects in the Application fail to explore this scenario, and therefore the projects fail to demonstrate that there are no feasible alternatives to the use of natural gas.

IV. CONCLUSION

SCG fails to demonstrate that Projects A, C, D, E, F, G, and H comply with all three minimum requirements set in D.22-09-026. Thus, the Commission should reject gas line extension subsidies for the projects mentioned above.

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[39] Data derived from CARB, LCFS Quarterly Data Spreadsheet as of Q3 2024, Worksheet "Fuels" at Cell "BE108", available at:

https://ww2.arb.ca.gov/sites/default/files/2025-01/quarterlysummary_Q32024.xlsx.

[40] Data derived from amended CARB LCFS regulation as of June 27, 2025, Table 7-1, available at: https://ww2.arb.ca.gov/sites/default/files/2025-08/2025_lcfs_fro_oal-approved_unofficial_08112025.pdf.

[41] SCG Chapter 2 Testimony Workpapers at 36.

ATTACHMENT 1

SCG Response to Data Request
CAL ADVOCATES-AZ-2025-04

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-04
REQUEST DATED: SEPTEMBER 8, 2025
SOCALGAS RESPONSE DATED: SEPTEMBER 22, 2025

Question 1.

Has SCG or the project applicant conducted any analysis on the greenhouse gas emissions of the applicants' projects if the projects utilized regular natural gas instead of renewable natural gas?

a) If SCG has conducted this analysis, please provide it as an attachment to this data request.

b) If any project applicants have conducted this analysis, please provide the analysis for each individual project as an attachment to this data request.

   i. Please also indicate whether SCG has verified any project applicant analyses.

Response 1.

No.

a) Not applicable.
b) Not applicable.
   i. SoCalGas established a 'Standard Lifecycle GHG Emission Reduction Methodology' that was applied to each project to verify the estimated GHG emission reduction analysis of each application, as discussed in A.25-07-001 Chapter 2 - Prepared Direct Testimony of Jason Legner.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-04
REQUEST DATED: SEPTEMBER 8, 2025
SOCALGAS RESPONSE DATED: SEPTEMBER 22, 2025

Question 2.

Do any project applicants plan on self-producing renewable natural gas for use in the proposed fueling stations?

a) If yes, please provide the quantity of produced renewable natural gas for each project applicant, in therms.
b) If any project applicants produce renewable natural gas as an input to SCG's gas transmission system, please provide these contracts.

Response 2.

One customer application identified availability of self-produced RNG via an offsite customer-owned anaerobic digester.

a) No customer application provided a quantity of self-produced RNG.
b) SoCalGas objects to this request on the grounds it is overly broad and not relevant because it seeks information beyond the scope of issues raised in this proceeding and thus is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001) DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-04 REQUEST DATED: SEPTEMBER 8, 2025 SOCALGAS RESPONSE DATED: SEPTEMBER 22, 2025

Question 3.

For each project applicant, please describe how the applicant intends to procure the renewable natural gas required for the proposed fueling projects.

Response 3.

SoCalGas objects to this request on the grounds it is not relevant because it seeks information beyond the scope of issues raised in this proceeding and thus is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas is not aware. In general, customers who are not self-producing any or an adequate supply of RNG procure RNG through the project developer, a separate marketer, or via a direct contract with an RNG producer.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-04
REQUEST DATED: SEPTEMBER 8, 2025
SOCALGAS RESPONSE DATED: SEPTEMBER 22, 2025

Question 4.

Has SCG received evidence that indicates all project applicants have procured adequate renewable gas supply for the total 6,718,435 therms per year that the projects are estimated to consume?

a) If yes, please provide the supporting evidence as an attachment to this data request.

Response 4.

SoCalGas objects to this request on the grounds it calls for speculation and is not relevant because it seeks information beyond the scope of issues raised in this proceeding and thus is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Each of the projects referenced in SoCalGas's application are at varying stages of development and to date none have been completed or are in operation. SoCalGas does not know where each project is in the renewable gas procurement process.

ATTACHMENT 2

SCG Response to Data Request
CAL ADVOCATES-AZ-2025-05

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-05
REQUEST DATED: SEPTEMBER 25, 2025
SOCALGAS RESPONSE DATED: OCTOBER 8, 2025**

Question 1.

Have any of the customer applicants whose projects are included in the Application previously received gas line extension subsidies for compressed gas fueling stations?

a) If yes, please provide the dollar amount of the subsidy granted and their original gas line extension application.

Response 1.

SoCalGas objects to this request on the grounds it is not relevant or likely to lead to relevant evidence pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure. Moreover, SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, particularly because there is no time period identified.

Question 2.

Please provide the estimated number of compressed gas vehicles each project is estimated to serve annually.

Response 2.

The estimated number of compressed natural gas (CNG) vehicles each project is estimated to serve annually is provided in A.25-07-001 Chapter 2 - Prepared Direct Testimony of Jason Legner, and is also provided in the table below:

Project Identifier	Type of Station	Estimated Number of CNG Vehicles for Private Use
A	Private	700
B	Public	N/A
C	Public	N/A
D-1	Private	125
D-2	Private	35
E	Private	30
G	Public	N/A
H	Public	N/A

Note that the applicant for Project F canceled their project due to cost and feasibility; therefore, it is not included in the above table.

Projects B, C, G and H did not provide the estimated number of vehicles as it was not required as part of application. In any event, accurately estimating the number of vehicles served by a public RNG station is challenging due to a range of variables such as the number of competing stations in the area, the concentration of RNG-fueled vehicles either domiciled nearby or passing through, the types of vehicles being refueled, and their respective tank capacities. Opening these public stations is similar to any retail application in that there is an inherent level of uncertainty regarding customer volume and consumption patterns.

Question 3.

Please provide all documents submitted by customer applicants in response to Question 36 of the New Business Allowance Exception Application as an attachment to this data request. Please include the applicable project name (Project A, Project B, etc.) in the title of each document.

Response 3.

Two of the three documents produced in response to this question are being provided as **Confidential and Protected Materials Pursuant to PUC Section 583, D.21-09-020 and GO 66-D (Revision 2).** Please see the following documents files:

- Project A_CustomerApp_SupportingDoc_CONFIDENTIAL.pdf
- Project G_S1_20_2025_CONFIDENTIAL.pdf
- Project B_Portals_14_CAP_2019_Full.pdf

Note that for Project A, SoCalGas is providing the amended response as that is the governing document. This document was also provided in Chapter 2 workpapers as SCG-02-WP-026.

Question 4.

In its Chapter 1 Testimony, SoCalGas states that it reviewed 81 applications for a gas line subsidy. The Application also states:

> Each application was evaluated to determine whether the proposed project substantiated the ability to meet the three eligibility criteria for gas line extension allowances, as set forth in the Decision. Of the 81 applications reviewed, nine projects were identified as meeting the eligibility criteria outlined in the Decision.

a) Did SCG verify the claims and assertions made in the applications for the nine projects included in the Application?

b) If yes, how did SCG verify the customer applicants' claims?

Response 4.

a) Yes.

b) Please refer to Part II of Chapter 2 - Prepared Direct Testimony of Jason Legner in A.25-07-001.

Question 5.

Please provide any supporting evidence SCG has received from the nine customer applicants to demonstrate the estimated annual energy use of renewable natural gas for each project.

a) If SCG has not received any supporting evidence of this nature, does SCG plan to ask customers for such evidence?

Response 5.

SoCalGas objects to this request on the grounds it is vague and ambiguous, and overly broad and unduly burdensome, particularly with respect to the phrase "any supporting evidence," and exceeds the bounds of permissible discovery pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas does not understand the question "does SCG plan to ask customers for such evidence" to seek information that has direct or indirect evidentiary value in this proceeding. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Each customer provided their estimated annual energy use in their submitted application provided in the Chapter 2 Testimony workpapers.

a) SoCalGas reviewed the usage estimates from customers and found them reasonable. Additional supporting evidence was not provided, as actual usage is verified three years after service begins. Customers pay the full project cost upfront at the time of contract. Any applicable allowances are determined and issued after the three-year verification period, based on actual usage.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-05
REQUEST DATED: SEPTEMBER 25, 2025
SOCALGAS RESPONSE DATED: OCTOBER 8, 2025

Question 6.

Has SCG asked any of the nine customer applicants for additional information beyond what was included in the customers' project applications?

Response 6.

SoCalGas objects to this request on the grounds it is vague and ambiguous. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas requested information from applicants beyond what was included in their applications, and that additional information is reflected in the testimony and workpapers, in particular in Chapter 2 - Prepared Direct Testimony of Jason Legner and workpapers.

ATTACHMENT 3

SCG Response to Data Request
CAL ADVOCATES-AZ-2025-06

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY
FOR GAS LINE EXTENSION ALLOWANCE (A.25-07-001)
DATA REQUEST CAL ADVOCATES-AZ-SCG-2025-06
REQUEST DATED: OCTOBER 15, 2025
SOCALGAS RESPONSE DATED: OCTOBER 24, 2025

Question 1.

In response to Data Request CALADVOCATES-AZ-SCG-2025-05 Question 5(a), SCG states: "SoCalGas reviewed the usage estimates from customers and found them reasonable. Additional supporting evidence was not provided, as actual usage is verified three years after service begins. Customers pay the full project cost upfront at the time of contract. Any applicable allowances are determined and issued after the three-year verification period, based on actual usage."

- **a.** Please describe how SCG will verify usage for the three years after service begins.
- **b.** Will SCG calculate the emissions intensity of the fuel used during this period?

Response 1.

a. JM-4 of A.25-07-001 Chapter 1 - Prepared Direct Testimony of Jennifer Morris describes the true-up process for all customers at 36 months post-installation where actual usage will be compared to contracted equipment usage. SoCalGas uses customer meter data to verify usage.

b. No.

ATTACHMENT 4

Qualifications of Witnesses

PREPARED TESTIMONY

OF

ANDY ZHANG

Q1. Please state your name, business address, and position with the Public Advocates Office (Cal Advocates).

A1. My name is Andy Zhang and my business address is 505 Van Ness Ave, San Francisco, CA 94102. I am currently employed by the Public Advocates Office at the California Public Utilities Commission as a Public Utilities Regulatory Analyst assigned to the Electric Pricing and Customer Programs branch of Cal Advocates, Customer Programs section.

Q2. Please summarize your educational background and professional experience.

A2. I graduated from New York University in 2021 with a bachelor's degree, double majoring in Environmental Studies and Political Science. Additionally, I have received training in ratemaking principles from the National Association of Utility Commissioners (NARUC).

I joined Cal Advocates in 2023 and have been assigned to work on energy efficiency, building decarbonization, clean energy financing, distributed energy resources, and income-qualified programs. In this capacity, I have participated in the related Commission proceedings as a subject matter expert.

Q3. What is your responsibility in this proceeding?

A3. I am responsible for writing Cal Advocate's testimony in this Application.

Q4. Does this conclude your prepared direct testimony?

A4. Yes, it does.