CPUC Docket: A.26-01-003 et al.
Exhibit Number: TURN-06
Date: November 25, 2026

A.26-01-003 et al.

Ex. TURN-06

SoCalGas responses to TURN DR 9, Questions 2, 3, and 5

Question 2:

SoCalGas's rebuttal testimony at p. OV-RC-7 states that "its actual PEV selections have historically remained below the maximum allowable level because SoCalGas employs a targeted selection methodology rather than randomly verifying customers up to the regulatory PEV cap." Is SoCalGas currently prohibited from conducting these targeted verifications up to its maximum PEV cap? Please explain.

SoCalGas Response:

No. SoCalGas may conduct targeted verifications up to the applicable PEV cap but may not exceed that limit.

Historically, SoCalGas's actual PEV selections have remained below the maximum allowable level due to its targeted verification approach, program priorities, and available resources, rather than SoCalGas being prohibited from conducting additional targeted verifications. Prior to the COVID-19 Pandemic, SoCalGas focused on enrolling eligible customers in CARE and did not prioritize reaching the maximum PEV cap. Following the pandemic, as CARE enrollment increased due to ongoing enacted emergency customer protections suspending recertification and verification processes, SoCalGas reevaluated its approach and updated its targeting model to support an annual PEV selection rate of 7%, consistent with efforts to achieve the CPUC's CARE participation goal[1].

[1] D.21-06-015 at 20.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-09
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Question 3:

SoCalGas's rebuttal testimony at p. OV-RC-7 states that "SoCalGas proposes a flexible, data-driven strategy under which verification and recertification activities may be adjusted based on actual CARE enrollment levels."

a. Please explain the specific details of this strategy.
b. If SoCalGas plans to implement a specific formula of PEV to enrollment levels, please provide that formula.
c. If SoCalGas is not proposing a specific formula of PEV to enrollment levels, please explain how SoCalGas plans to determine the appropriate level of PEV based on CARE enrollment.

SoCalGas Response:

a. SoCalGas's proposed strategy is intended to provide flexibility to adjust verification and recertification activities based on actual CARE enrollment levels. In determining the appropriate level of PEV activity, SoCalGas considers CARE enrollment levels, program objectives, and the operational capacity when targeting verifications. The CARE model supports an annual PEV selection rate of 7%.
b. SoCalGas does not propose a specific formula that establishes a predetermined relationship between PEV levels and CARE enrollment levels.
c. SoCalGas plans to determine the appropriate level of PEV activity based on actual CARE enrollment levels, program objectives, and operational capacity. While the CARE model supports an annual PEV selection rate of 7%, SoCalGas retains the flexibility to adjust its verification levels up to the applicable PEV cap as appropriate based on program conditions and enrollment levels.

Question 5:

SoCalGas's response to TURN DR 8 Q1 provided its (a) authorized and (b) completed PEV percentage for CARE in each year 2015-2025.

a. Please confirm whether this only reflects traditional (random) PEV, as SoCalGas does not perform high-usage PEV.
b. Please explain whether it is SoCalGas's understanding that the PEV cap only applies to traditional PEV, and does not apply to high-usage PEV.[4]

SoCalGas Response:

a. Yes. The PEV percentages provided in SoCalGas's response to TURN DR 8, Q1 reflect traditional PEV only. Its response does not include high-usage PEV (HUPEV), which applies only to electric utilities.
b. Yes. SoCalGas understands that the PEV cap applies to traditional PEV and does not apply to HUPEV. HUPEV requirements apply only to electric utilities.

[4] According to SCE response to TURN DR 9, Q1, Atch, high-usage PEV does not count against the PEV cap: "Advice Letter 2814-E established a seven percent maximum CARE post-enrollment income verification rate effective December 27, 2012. D.17-12-009, OP 85 subsequently directed the IOUs not to count High Usage Verification (HUV) requests toward the 7% verification threshold."