

Docket No.: A.26-01-009
Exhibit No.: SC-24
ALJ: Jamie Ormond
Witness: Tyson Siegele

Exhibit SC-24

SoCalGas Response to Sierra Club Data Request 7 - Supplemental (Sept. 30, 2026)

The two confidential excel spreadsheets mentioned in and attached to the original response are excluded from this exhibit.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY IN COMPLIANCE WITH
ORDERING PARAGRAPH 6 OF DECISION 24-12-076 (A.26-01-009)**

(DATA REQUEST #7 OF SIERRA CLUB)

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These Responses are based upon the best available non-privileged responsive information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request. SoCalGas reserves the right to supplement, amend, or correct the Responses. The Responses are provided solely in connection with California Public Utilities Commission (CPUC) proceeding A.26-01-009.

QUESTION 6:

Provide all power market simulation modeling inputs used to produce Table 34 of the 2024 California Gas Report and Table 38 of the 2026 California Gas Report, for each modeled year. For the 2024 report this refers to the PLEXOS model; for the 2026 report, to the power market simulation described at page 114.

RESPONSE 6:

SoCalGas objects to this request as overly broad and unduly burdensome, particularly to the extent this information is equally available to the requesting party. SoCalGas also objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The 2024 CGR power market simulation modeling inputs include the following schedules listed in the EG section of the 2024 CGR workpapers and a fuel price forecast.

- California Energy Commission (CEC) 2023 Integrated Energy Policy Report (IEPR) California Energy Demand 2023-2040 Planning Forecast
 - Schedule 1 - Form 1.5a STATEWIDE/Total Energy to Serve Load by Agency and Balancing Authority (GWh)
 - Schedule 2 - Form 1.5b – STATEWIDE/1-in-2 Net Electricity Peak Demand by Agency and Balancing Authority (MW)
 - Schedule 3: Form 1.1c – STATEWIDE/Electricity Deliveries to End Users by Agency (GWh)
- Schedule 4 – California Public Utilities Commission (CPUC) 2023 Preferred System Plan (PSP), Integrated Resource Planning Proceeding R.20-05-003 new California resource assumptions
- Schedule 5 – CEC 2023 IEPR Green House Gas (GHG) Compliance Costs (mid-price scenario)
- Schedule 6 – California State Water Resources Control Board's Once Through Cooling (OTC) Compliance Schedule (August 15, 2023)
- Fuel price forecast – See Sierra Club DR 7 A2601009_Q6a_CONFIDENTIAL

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The 2026 CGR power market simulation modeling inputs include the following schedules listed in the EG section of the 2026 CGR workpapers and a fuel price forecast.

- California Energy Commission (CEC) 2024 Integrated Energy Policy Report (IEPR) California Energy Demand 2024-2050 Planning Forecast
 - Schedule 1 - Form 1.5a STATEWIDE/Total Energy to Serve Load by Agency and Balancing Authority (GWh)
 - Schedule 2 - Form 1.5b – STATEWIDE/1-in-2 Net Electricity Peak Demand by Agency and Balancing Authority (MW)
 - Schedule 3: Form 1.1c – STATEWIDE/Electricity Deliveries to End Users by Agency (GWh)
- Schedule 4 – Preferred System Plan and Portfolios for 2025-2027 TPP
- Schedule 5 – CEC 2025 IEPR Green House Gas (GHG) Compliance Costs (mid-price scenario)
- Schedule 6 – California State Water Resources Control Board’s Once Through Cooling (OTC) Compliance Schedule (August 15, 2023)
- Fuel price forecast: See Sierra Club DR 7 A2601009_Q6b_CONFIDENTIAL

Additionally, the 2024 CGR EG forecast used the California Energy Commission (CEC) Consumption Database Management System (ECDMS), which has since been discontinued. The 2026 CGR EG forecast used PLEXOS’ structured power-system modeling database which is embedded in the PLEXOS model.

QUESTION 7:

Regarding Table 34 in the 2024 California Gas Report and Table 38 in the 2026 California Gas Report, provide the assumed hourly CAISO electric demand (MWh) for the 1-in-10 peak gas demand day for each year modeled.

RESPONSE 7:

SoCalGas objects to this request as overly broad and unduly burdensome, particularly to the extent this information is equally available to the requesting party. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

For 2024 CGR, please refer to the 2023 IEPR CED 2023 Hourly Forecast - CAISO - Planning_Scenario – Corrected: <https://www.energy.ca.gov/data-reports/reports/2023-integrated-energy-policy-report/2023-iepr-workshops-notice-and-2>.

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For 2026 CGR, see 2024 IEPR CED 2023 Hourly Forecast - CAISO - Planning_Scenario – Corrected: <https://www.energy.ca.gov/data-reports/reports/2023-integrated-energy-policy-report/2023-iepr-workshops-notice-and-2> adjusted for the Additional Achievable Fuel Substitution (AAFS) Scenario 1 Programs and Incremental Codes & Standards (PiCS): <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2024-integrated-energy-policy-report-0>.

QUESTION 8:

Regarding Table 34 in the 2024 California Gas Report and Table 38 in the 2026 California Gas Report, provide the assumed hourly non-CAISO electric demand (MWh) for the 1-in-10 peak gas demand day for each year modeled.

RESPONSE 8:

SoCalGas objects to this request as overly broad and unduly burdensome, particularly to the extent this information is equally available to the requesting party. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The 2024 CGR EG forecast used the California Energy Commission (CEC) Consumption Database Management System (ECDMS), which has since been discontinued. The 2026 CGR EG forecast used PLEXOS’ structured power-system modeling database which is embedded in the PLEXOS model.

QUESTION 11:

Regarding Table 38 in the 2026 California Gas Report, the “Electric Generation” column has been reproduced in the center column in the table below. The “% change from prior year” has been calculated for this data request.

Year	Electric Generation	% change from prior year
2026	1,201	
2027	1,165	-3.0%
2028	965	-17.2%
2029	991	2.7%
2030	1,097	10.7%
2031	988	-9.9%
2032	901	-8.8%

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- a. Provide a year-by-year explanation of the increases and decreases in the Electric Generation column. For each year 2027 through 2032, quantify in MMcfd the contribution of each factor to the change from the prior year, including but not limited to: changes in forecast electricity demand; additions of generating or storage resources; retirements of generating resources; changes in hydroelectric conditions; changes in assumed natural gas prices; changes in assumed GHG allowance prices; and changes in assumed electricity imports. Address specifically the 200 MMcfd decrease from 2027 to 2028, and the consecutive increases of 26 MMcfd from 2028 to 2029 and 106 MMcfd from 2029 to 2030.
 - b. Schedule 4 of the 2026 Workpapers shows cumulative new California renewable and storage resources increasing by 16,351 MW in 2029 and by a further 16,351 MW in 2030. Explain why peak-day electric generation gas demand increases in both of those years.
 - c. If there are errors in the “Electric Generation” column of Table 38 of the 2026 California Gas Report, state how the error occurred and provide a corrected Electric Generation column.
 - d. If there are errors in the “Electric Generation” column of Table 38 of the 2026 California Gas Report, state the approximate date that a corrected version of the 2026 California Gas Report will be issued.

RESPONSE 11:

- a. SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

PLEXOS does not add up the effects of individual inputs one at a time. It solves for least-cost unit commitment and dispatch across the whole system, and it evaluates all modeling inputs and constraints simultaneously. These include forecast electricity demand, resource additions and retirements, hydroelectric conditions, natural gas prices, GHG allowance prices, electricity imports, and transmission and operating constraints.

Because of these interdependencies, the modeled year-over-year change in peak day EG gas demand is the combined result of all inputs acting together. PLEXOS does not produce a breakdown that assigns a separate MMcfd contribution to any single assumption. Therefore, it is not possible to isolate and quantify the contribution of any single modeling assumption to the

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peak day EG forecast figures shown in Table 38, or to the year-over-year changes between them.

- b. Peak 1-in-10 electric generation increased in 2029 and 2030 due to a combination of CEC's expectation of increased CAISO electric demand and availability of resources available relative to earlier years to meet forecasted managed net electricity load in those two years.
- c. N/A.
- d. N/A.

QUESTION 12:

Table 34 in the 2024 California Gas Report forecasts 2026 gas demand for "Electric Generation" as 1,033 MMcfd. Table 38 in the 2026 California Gas Report forecasts 2026 gas demand for "Electric Generation" as 1,201 MMcfd. Identify and define all modeling input changes that produced the change in the forecast for the 2026 gas demand for "Electric Generation."

RESPONSE 12:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The two forecasts differ because the 2024 CGR and the 2026 CGR were prepared at different times, using different assumptions, modeling inputs, and databases. Each report is a separate forecast. See Responses 6, 7, and 8.

QUESTION 13:

Clarify gas demand changes from the 2024 California Gas Report to the 2026 California Gas Report (Schedule 7 and Schedule 9 workpapers for each year):

- a. Explain why the annual base-case electric generation throughput for 2026 declined from 203 Bcf in the 2024 California Gas Report Workpapers to 176,184 Mdth in the 2026 Workpapers.
- b. Explain why the winter coincidental peak-day electric generation demand for 2026 increased from 874 MMcfd in the 2024 California Gas Report Workpapers to 1,039 Mdth per day in the 2026 Workpapers.
- c. Supply the resource assumptions responsible for the divergence between the annual base-case electric generation throughput for 2026 and the winter coincidental peak-day

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electric generation demand.

RESPONSE 13:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request to the extent this information is equally available to the requesting party. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See Response 12.
- b. See Response 12.
- c. See Response 12.

QUESTION 18:

The 2026 California Gas Report on page 114 states:

The gas-driven EG forecast uses a power market simulation for the period of 2026-2040. The simulation reflects the anticipated dispatch of all EG resources in the SoCalGas service territory using a base electricity demand scenario under both average and low hydroelectric availability market conditions. The base case assumes most of the CPUC adopted 2025 Preferred System Plan, which also assumes compliance with the Mid-Term Reliability (MTR). [footnote 91: “D.21-06-035.”] Also assumed in the forecast is compliance with the GHG planning target of 25 million metric tons (MMT) by 2040. This plan includes an aggressive amount of energy storage resources along with significant renewables resources throughout the study period. While California load-serving entities (LSEs) are working to meet their GHG goals, there are uncertainties as to how much renewable power and energy storage resources will be added specifically during the study period.

- a. Regarding 2026 California Gas Report statement “The base case assumes most of the CPUC adopted 2025 Preferred System Plan,” what part of the 2025 preferred system plan was included and what part of the preferred system plan was excluded?
- b. Does the power market simulation include resources that the Commission ordered after D.21-06-035?

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- c. Regarding the 2026 California Gas Report for the power market simulations, provide a spreadsheet of the assumed operating electricity generation and electricity storage resources for each year 2026 through 2040, identifying the generating type for each resource (e.g., solar, wind).

RESPONSE 18:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request to the extent it imposes upon SoCalGas an obligation to generate or create records that do not exist, or which have not been generated or created in its regular course of business. This purported obligation exceeds the requirements provided by the CPUC’s Discovery Custom and Practice Guidelines and California Code of Civil Procedure Section 2031.230. SoCalGas also objects to this request to the extent that it seeks information that is not within SoCalGas knowledge or control. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The CAISO capacity assumptions used in the model were based on the capacity defined under the 2025–2027 Transmission Planning Process scenario for the 2024–2027 Integrated Resource Plan (IRP) cycle: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/2024-27-irp-cycle-events-and-materials>.
- b. No.
- c. SoCalGas is not able to provide the requested spreadsheet because the underlying data is owned by a third-party consultant and is not available to SoCalGas.

QUESTION 19:

The 2026 California Gas Report states at page 114 that the electric generation demand forecast is “sourced from the CEC’s California Energy Demand Forecast, 2025-2045, adopted January 2026.” Schedules 1, 2, and 3 of the 2026 Workpapers, at pages 222 through 225, are headed “California Energy Demand 2024-2050 Forecast – Planning Forecast.” Identify the California Energy Commission forecast vintage, case, and adoption date used to develop Table 38.

RESPONSE 19:

SoCalGas objects to this request on the grounds it is unduly burdensome to the extent this information is equally available to the requesting party. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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The assumptions used in the model were based on the 2025–2026 TPP scenario for the 2024–2027 IRP cycle available here: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/2024-27-irp-cycle-events-and-materials>.

QUESTION 20:

Regarding the 2026 California Gas Report Workpapers, Schedule 4 (page 226), provide the baseline resource total for each resource type (i.e., the baseline resource capacity assumed in the power market simulations prior to the additions shown for 2027-2040).

RESPONSE 20:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request to the extent that it seeks information that is not within SoCalGas knowledge or control. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas is not able to provide the requested information because the underlying data is owned by a third-party consultant and is not available to SoCalGas.

QUESTION 21:

Explain why the 2026 Workpapers do not include the “New California Resource Assumptions” narrative that appeared on page 315 of the 2024 Workpapers.

RESPONSE 21:

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The 2024 Workpapers and the 2026 Workpapers are separate reports, and each was prepared for its own filing and forecast period. SoCalGas chose not to include the "New California Resource Assumptions" narrative from page 315 of the 2024 Workpapers in the 2026 Workpapers.

QUESTION 22:

The 2024 California Gas Report Workpapers and the 2026 California Gas Report Workpapers show annual EG throughput under the base case and 1-in-10 dry hydro case (Schedules 7 and 8). For the base case and the 1-in-10 dry hydro case in each report, identify:

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- a. the assumed hydroelectric generation, stated in GWh by month and by year, for each modeled year;
 - b. the geographic scope of the assumption, identified separately for in-state California hydroelectric generation, hydroelectric generation elsewhere in the WECC, and any assumed effect of hydroelectric conditions on electricity imports into California;
 - c. the historical calendar years, water years, or averaging period used to define each case; and
 - d. the source of the hydroelectric data and the date obtained.

RESPONSE 22:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas is not able to provide the requested information because the underlying data is owned by a third-party consultant and is not available to SoCalGas.
- b. SoCalGas is not able to provide the requested information because the underlying data is owned by a third-party consultant and is not available to SoCalGas.
- c. Calendar years 2011 to 2025 were used for the base and dry-hydro years. An average hydrological condition was represented by 2018 and a dry hydrological year was represented by 2021.
- d. The source was the Energy Information Administration (EIA) and was obtained in 2026.

QUESTION 23:

Schedules 7 and 8 of the 2024 California Gas Report Workpapers show annual EG throughput under the base case and the 1-in-10 dry hydro case differing by 0 to 2 Bcf per year. The corresponding schedules in the 2026 Workpapers show the two cases differing by approximately 7,300 to 9,200 Mdth per year across the forecast horizon. Explain the change in the difference between the base case and the 1-in-10 dry hydro case from the 2024 California Gas Report to the 2026 California Gas Report.

RESPONSE 23:

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas also objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the issues in the pending proceeding nor is

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likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Different modeling inputs and assumptions, databases and updated history were used for the 2024 and 2026 CGRs resulting in differing differences between the base case and 1-in-10 dry hydro cases for each report.