

Docket No.: A.26-01-009
Exhibit No.: SC-23
ALJ: Jamie Ormond
Witness: Tyson Siegele

Exhibit SC-23

SoCalGas Response to Sierra Club Data Request 7 - First Set of Responses (Sept.
23, 2026)

**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)

Date Requested: September 1, 2026

Submitted: September 23, 2026

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 1:

In its August 13, 2026 response to Sierra Club's Data Request #5, SoCalGas states in Response 4 that:

The Navigator model calculated only Average Year forecasts. The Cold Year and Hot Year forecasts are calculated as the mathematical adjustments of the Average Year forecast as below.

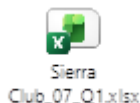
Cold Year Forecast = Average Year Forecast + (Cold Year HDD – Average Year HDD) × HDD sensitivity.

Hot Year Forecast = Average Year Forecast + (Hot Year HDD – Average Year HDD) × HDD sensitivity.

Response 4 does not identify the numeric value of “HDD sensitivity” used in this formula, nor the methodology used to derive it. Please identify the specific value(s) of “HDD sensitivity” used in this formula and define the methodology used to derive it.

RESPONSE 1:

The HDD sensitivities are used to calculate the Cold Year and Hot Year forecasts based on the Navigator model's Average Year forecasts for core markets (residential, core commercial, core industrial). The base year's HDD sensitivity is calculated from the linear regression models of the historical monthly consumption as a function of the monthly HDDs. The other years' HDD sensitivities are calibrated to the Navigator's annual forecasts. Thus, the HDD sensitivity values are not constant over the forecasting period. See attached Aliso_Sierra Club_07_q1 for the specific values used in the 2024 California Gas Report (CGR).



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QUESTION 2:

Table 34 of the 2024 California Gas Report and Table 38 of the 2026 California Gas Report provide winter 1-in-10 cold day demand values for electric generation (EG). Footnote 5 to Table 34 and note 5 to Table 38 both state:

Electric Generation includes UEG/EWG 1-in-10 Dry Hydro, large cogeneration, industrial and commercial cogeneration (<20MW), refinery-related cogeneration, and EOR-related cogeneration.

We are seeking details on the calculation for these components. More specifically:

- a. **UEG/EWG 1-in-10 Dry Hydro + large cogeneration:** According to 2024 California Gas Report Workpapers, this category's contribution to the forecasted values in Table 34 is generated by the Energy Exemplar PLEXOS model. The Workpapers include two tables that summarize PLEXOS peak-day demand forecasts, a base case winter forecast (Schedule 9) and a dry hydro summer forecast (Schedule 10). But neither one of these outputs match the scenario outlined in Footnote 5 above. Schedule 9 matches the correct season (winter), but not the dry hydro condition, while Schedule 10 matches the dry hydro condition but not the correct season (summer, not winter). Please state which values were used to generate this portion of the forecasted values in Table 34 and Table 38, and how this value relates to the PLEXOS outputs in Schedule 9/10. State whether a dry hydro winter simulation was performed for either report (2024 or 2026). If so, produce its output. If not, explain how the values in Table 34 and Table 38 are consistent with the description "UEG/EWG 1-in-10 Dry Hydro."
- b. **Industrial and commercial cogeneration (<20MW):** This category's annual gas demand is forecast using an econometric equation based on the number of customers and the ratio of gas-to-electricity prices. The Workpapers provide annual and monthly demand forecasts for this category but do not disclose a value or methodology for generating a peak-day-specific value. Please state what value was used for this category's contribution to the forecasted values in Table 34 and Table 38, and how that value was derived from the disclosed annual and monthly forecasts.
- c. **Refinery-related cogeneration:** This category's monthly gas demand is forecasted using an econometric equation based on the ratio of burner-tip natural gas prices to propane prices. While the workpapers disclose monthly forecasts for refinery cogeneration (G-50) demand, they do not disclose a peak-day-specific figure or methodology for this category. Please state what value was used for this category's contribution to the forecasted values in Table 34 and Table 38, and how that value

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was derived from the disclosed monthly forecast.

- d. **EOR-related cogeneration:** This category's gas demand is forecasted on an annual basis for both steaming and cogeneration uses. The workpapers do not disclose a peak-day-specific figure or methodology for this category. Please state what value was used for this category's contribution to the forecasted values in Table 34 and Table 38, and how that value was derived from the disclosed annual forecast.

RESPONSE 2:



- a. See Aliso_Sierra Club_07_q2a for the values used in Table 34 of the 2024 California and Table 38 of the 2026 CGR. Schedule 9 are subcomponents of the electric generation (EG) loads included in both tables. Footnote 5 of Table 34 should read “Electric Generation includes UEG/EWG Base Hydro, large cogeneration, industrial and commercial cogeneration (<20MW), refinery-related cogeneration, and EOR-related cogeneration.”
- b. See Aliso_Sierra Club_07_q2bcd. The value was derived by dividing the sum of respective forecasted December values that make up the industrial and commercial cogeneration (<20MW) category by 31 and applying a BTU factor.
- c. See Aliso_Sierra Club_07_q2bcd. The value was derived by dividing the sum of respective forecasted December values that make up the refinery-related cogeneration category by 31 and applying a BTU factor.
- d. See Aliso_Sierra Club_07_q2bcd. The value was derived by dividing the sum of respective forecasted December values that make up the EOR category by 31 and applying a BTU factor.

QUESTION 3:

State the reasons for the changes to the “Base Forecast Equation” for “Refinery-related cogeneration” in the 2026 California Gas Report compared to the 2024 California Gas Report.

RESPONSE 3:

Additional refinery actuals were available since the 2024 California Gas Report (CGR) forecast was prepared.

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QUESTION 4:

Regarding the 2026 California Gas Report, identify the name of the model used for the power market simulation described at page 114 of the 2026 California Gas Report.

RESPONSE 4:

PLEXOS.

QUESTION 5:

If in the 2026 California Gas Report, SoCalGas did not use PLEXOS to complete the power market simulation, state the reason that SoCalGas changed the model it used. If SoCalGas continues to use PLEXOS, state why SoCalGas removed PLEXOS from the gas report description.

RESPONSE 5:

N/A.

QUESTION 9:

Regarding Table 34 in the 2024 California Gas Report and Table 38 in the 2026 California Gas Report, for each modeled year, provide a reconciliation of the Electric Generation column to its component parts in MMcf, showing separately:

- a. the UEG/EWG and large cogeneration value and the workpaper schedule from which it is taken,
- b. each of the three remaining cogeneration categories for SoCalGas and for SDG&E separately, and
- c. any peak-day adjustment, seasonal factor, or other uplift applied to any component, together with the derivation of that factor.

RESPONSE 9:

See Response 2a.

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QUESTION 10:

Gas Report included a column titled “Estimated AAFS Impact on Core Peak Day Demand,” reporting values from –18 MMcfd in 2024 to –106 MMcfd in 2030, with note 7 stating those impacts were included in the forecast of peak day demand. Explain why Table 38 of the 2026 California Gas Report contains no equivalent column or note.

RESPONSE 10:

Table 38 of the 2026 California Gas Report does not include an equivalent column or explanatory note because it was not considered necessary for the purposes of that table. The AAFS impacts on core peak day demand did not need to be separately itemized in Table 38 given the scope and focus of the data presented therein. The underlying AAFS adjustments remain reflected in the peak day demand figures themselves; however, breaking them out as a discrete line item was not warranted for the presentation objectives of that particular table.

QUESTION 14:

State why SoCalGas changed from reporting Schedule 7 in Bcf in 2024 workpapers to Mdth in the 2026 workpapers.

RESPONSE 14:

SoCalGas elected to report Schedule 7 in Mdth in the 2026 workpapers because the 2026 CGR EG forecast was prepared using Mdth.

QUESTION 15:

Line 38 of Table 36 of the 2024 California Gas Report states SoCalGas’s recorded Total BTU Factor (Dth/Mcf) for 2019 through 2023 as 1.0336, 1.0293, 1.0322, 1.0313, and 1.0317. Line 38 of Table 10 of the 2025 California Gas Report Supplement reports the 2024 factor as 1.0301. Footnote 4 to the Core Peak Day Forecast tables in the 2026 California Gas Report Workpapers applies factors of 1.0260 and 1.0201.

- a. State the basis for the 1.0260 Dth/Mcf conversion factor used in the 2026 California Gas Report Workpapers at page 271 (PDF page 281).
- b. State the basis for the 1.0201 Dth/Mcf conversion factor used in the SDG&E workpapers to the 2026 California Gas Report, at page 195 (PDF page 515 of the

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combined 2026 California Gas Report Workpapers).

- c. State which parts of 2026 California Gas Report Table 38 use each of the conversion factors.
- d. Quantify in MMcfd the effect on each column of Table 38 of using 1.0260 and 1.0201 rather than the most recent recorded factor of 1.0301 (i.e., the 2024 Total Btu Factor according to the 2025 California Gas Report Supplement).
- e. Provide SoCalGas's recorded Total BTU Factor (Dth/Mcf) for 2025 using the same methodology that SoCalGas used to produce the Total BTU Factors that appeared as line 38 of Table 36 in the 2024 California Gas Report.
- f. Explain why Table 40 of the 2026 California Gas Report omits the "Total BTU Factor (Dth/Mcf)" row that appeared as line 38 of Table 36 in the 2024 California Gas Report.

RESPONSE 15:

- a. The SoCalGas British Thermal Unit (BTU) factor is calculated by dividing annual 2025 therms of natural for all classes by annual 100 cubic feet (ccf).
- b. The SDG&E British Thermal Unit (BTU) factor is calculated by dividing annual 2025 therms of natural for all classes by annual 100 cubic feet (ccf).
- c. The SoCalGas btu factor was used for each column.
- d. See attached Sierra Club DR7 A261009_Q15d.xlsx.



- e. The same methodology was used to calculate the recorded 2025 BTU factor in the 2026 CGR as was used for the factors that appear on line 38 in the 2024 CGR.
- f. Total BTU Factor (Dth/Mcf) does appear on line 38 of Table 40 in the 2026 CGR: [2026_California_Gas_Report.pdf](#). An earlier version had an incorrect version of Table 40.

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QUESTION 16:

Does the 2026 California Gas Report Table 38 account for gas demand changes resulting from the South Coast Air Quality Management District's Amended Rule 1146.2? If so, specify which categories of gas demand are impacted and quantify the impact.

RESPONSE 16:

No.

QUESTION 17:

The 2024 workpapers for the California Gas Report used "AAEE Scenario 3 and Additional Achievable Fuel Switching (AAFS) Scenario 3 Programmatic." The 2026 California Gas Report used "AAEE Scenario 3 and Additional Achievable Fuel Substitution (AAFS) Scenario 1 PiCS."

- a. Why did SoCalGas make this modeling change?
- b. Does the 2026 California Gas Report incorporate the AAEE Scenario into the reported categories of gas demand shown in Table 38?

RESPONSE 17:

- a. SoCalGas reviews updated AAFS scenarios when preparing CGR forecasts.
- b. Yes.