DOCKETED				
Docket Number:	22-OII-02			
Project Title:	Gas Decarbonization			
TN #:	267060			
Document Title:	Southern California Gas Company Comments - SoCalGas Winter 2025-2026 Technical Assessment			
Description:	N/A			
Filer:	System			
Organization:	Southern California Gas Company			
Submitter Role:	Intervenor Representative			
Submission Date:	11/6/2025 3:55:49 PM			
Docketed Date:	11/6/2025			

Comment Received From: Southern California Gas Company

Submitted On: 11/6/2025 Docket Number: 22-OII-02

# SoCalGas Winter 2025-2026 Technical Assessment

Additional submitted attachment is included below.



### SOUTHERN CALIFORNIA GAS COMPANY WINTER 2025-26 TECHNICAL ASSESSMENT

## November 6, 2025

## **Executive Summary**

Southern California Gas Company (SoCalGas) has prepared this technical assessment to provide a forecasted outlook of system reliability during the coming winter season (November 1, 2025 through March 31, 2026) and analyzed the associated risks to energy reliability during this period. For this assessment, SoCalGas has analyzed the following: (1) pipeline capacity available to bring gas into the system, (2) available storage withdrawal capacity and inventory levels needed for core reliability, (3) forecasted winter demand, (4) available system capacity given the assumed winter supply and forecasted demand, and (5) forecasted winter storage inventory. In performing this analysis, this assessment takes into consideration the various existing outages and operating restrictions on gas transmission and storage assets.

The California Public Utilities Commission (CPUC) mandates two winter design standards for SoCalGas: a 1-in-35 year peak day in which all noncore customers are assumed to be fully curtailed, and a 1-in-10 year cold day design standard in which service is provided to both core and noncore customers. SoCalGas forecasts a demand of 3.06 billion cubic feet per day (BCFD) for the 1-in-35 year peak day design standard and 4.56 BCFD for the 1-in-10 year cold day design standard in the 2024 California Gas Report (CGR).

Pipeline receipt capacities are expected to improve from summer 2025, and storage inventory is currently greater than the minimum necessary to maintain core reliability throughout the winter season. Assuming customers elect to utilize the available pipeline receipt capacity to deliver sufficient supply and no further infrastructure outages occur than those considered in this assessment, SoCalGas expects to have sufficient pipeline receipt capacity and storage levels to meet both the 1-in-35 year peak day and the 1-in-10 year cold day design standards.

As always, unexpected outages on the transmission pipeline and storage system, such as those resulting from third-party damage and immediate repair conditions (IRC), could still occur throughout the winter season and impact our capacity to serve demand as presented in this technical assessment<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> For example, in late October 2025, IRCs were discovered on Transmission Lines 225 and 4000 that severely restrict the capacity of the Wheeler Ridge and Northern Zones and impact withdrawal from the Honor Rancho storage field. These capacity losses have been included in this technical assessment and their associated capacity impacts were posted on ENVOY. Any IRC remediation delays extending beyond those outage end dates potentially impact SoCalGas's ability to serve customer demand under the 1-in-10 year cold day design standard.



## **System Reliability Assessment of Winter Months**

The CPUC has mandated two design standards for the winter operating season: the 1-in-10 year cold day standard, in which service is to be maintained to core customers and noncore customers under a temperature condition expected to recur once in a ten-year period; and the 1-in-35 year peak day standard, in which service is to be maintained to core customers under a temperature condition expected to recur once in a thirty-five-year period and service to all noncore customers is curtailed.

In assessing reliability in the upcoming winter, SoCalGas has analyzed the supply outlook for the system and the winter demand forecasts. These are addressed in turn below.

## **Supply Outlook**

# **Available Flowing Pipeline Supplies**

The SoCalGas/San Diego Gas and Electric (SDG&E) gas transmission system has a current capability to receive up to 3.775 BCFD of flowing supply on a firm basis. This means if customers deliver that much supply to the SoCalGas system, and there is sufficient customer demand, SoCalGas can redeliver that gas supply to customers.<sup>2</sup> Supplies delivered to the SoCalGas/SDG&E system, however, do not reach these available receipt levels for a variety of reasons, including that customers may choose to use SoCalGas's balancing service rather than deliver supplies, California production has declined over time, system demand frequently does not require maximum delivery of supply, or flowing supplies may not be available due to weather patterns or maintenance impacting the interstate pipelines upstream of the SoCalGas system, such as during a polar vortex event over the Midwest or an interstate pipeline outage. Additionally, planned and unplanned pipeline outages on the SoCalGas/SDG&E system can further reduce available receipt capacity.

To calculate this season's system capacity to serve customer demand, assumptions must be made regarding the available supply. The peak winter demand period is expected to occur either in December or January. During this timeframe, no projects or outages are planned on any major SoCalGas pipelines.<sup>3</sup> There is sufficient supply assumed at Blythe to utilize the full 1,210 million cubic feet per day (MMcfd) of receipt capacity. Otay Mesa is still available to receive up to 400 MMcfd of supply, but the total Southern Zone receipt capacity is limited to 1,210 MMcfd. Northern Zone and Wheeler Zone can also utilize their full capacities of 1,590 MMcfd<sup>4</sup> and 765 MMcfd, respectively.

SoCalGas's analysis also took into consideration that customers do not typically fully balance their supply with their demand given SoCalGas's balancing rules. SoCalGas has reviewed scheduled deliveries and has found that customers have historically used on average 80% of available interstate receipt capacity. In situations with significant infrastructure outages and limited storage supply, however, SoCalGas would require tighter balancing and expect to see higher capacity utilization as a result.

<sup>&</sup>lt;sup>2</sup> Customer demand may also be required to be in a specific location, such as on the Southern Zone in order to receive the full receipt capacity of 1,210 MMcfd at Blythe and Otay Mesa.

<sup>&</sup>lt;sup>3</sup> Line 4000 is expected to be in remediation through mid-December. Should a peak demand event occur in early December while Line 4000 is still out of service, SoCalGas expects to still be able to meet that level of demand.

<sup>&</sup>lt;sup>4</sup> With the restoration of Line 4000.



Given these considerations, and the lack of expected significant infrastructure outages beyond mid-December, for the purpose of this peak day capacity calculation, SoCalGas has adopted a peak day utilization assumption of 80% for all supplies except for local California production, which is assumed at the current production rate.

SoCalGas's ability to maintain uninterrupted service also depends upon customers delivering sufficient supply to the SoCalGas system. SoCalGas expects that there may be times during the winter season when gas supply from the interstate pipelines is unavailable due to weather conditions elsewhere in the country or pipeline constraints upstream of SoCalGas's system, such that supplies delivered to the system may be less than assumed in this assessment.<sup>5</sup> These situations are beyond the scope of this technical assessment, and additional customer curtailment may be necessary to maintain system integrity and service to core and critical noncore customers under such conditions.

While SoCalGas has factored in the known operating restrictions on its transmission pipelines, unexpected outages on the transmission system, such as those resulting from third-party damage and safety-related conditions, may still occur throughout the winter season, further reducing available receipt capacity beyond the levels projected in this assessment.

Based on the scenario information outlined above, the resulting receipt capacities during the peak winter period are detailed below in Table 1.

Receipt Point	Capacity/Supply (MMCFD)	Details
North Needles	800	
Topock	350	Topock limited to 350 MMcfd due to Line 3000 operational restrictions. Northern Zone capacity remains 1,590 MMcfd.
Kramer Junction	440	
Blythe	1,210	All supplies assumed at Blythe since supplies at Otay Mesa are
Otay Mesa	0	typically zero.
Wheeler Ridge & Kern River Station	765	
California Production	70	Current level of local California production.
Total	3,635	200/ utilization ourset at Colifornia Duodustion
Pipeline Utilization	2,922	80% utilization except at California Production.

#### **Available Storage Supplies**

The forecasted inventories and associated withdrawal rates for SoCalGas's storage fields at the start of the winter season and at those levels necessary to maintain core customer reliability are presented below in Table 2. Under most temperature conditions, gas will be withdrawn from storage throughout

<sup>&</sup>lt;sup>5</sup> For example, as recently as October 2025, upstream operator El Paso Natural Gas posted on its electronic bulletin board (EBB) a month-long delivery capacity impact at SoCal Ehrenberg attributed to pipeline maintenance.



the peak demand period of December through January. And while SoCalGas does not expect to be at maximum inventory levels system-wide during the peak demand period, storage inventory and withdrawal rates are expected to be sufficient to meet both mandated design standards due to improved pipeline receipt capacities.

Table 2. Projected Storage Field Performance, Winter 2025-26, Typical Well Maintenance Activities

Storage Levels	Inventory (BCF)	Withdrawal Capacity (MMcfd)	
Maximum	118.6	2,538	
November 1	106.6	2,271	
Minimum for Core Reliability*	47.2	1,401	

<sup>\*</sup> End of January

This data is based on wells currently or forecasted to be in service during the winter operating season and assumes a typical level of well outages at each field for routine maintenance and mandated reassessments. SoCalGas assumes in its forecast that there will be no outages beyond those already identified at any of the storage fields that would impact their ability to provide the winter withdrawal capacity assumed for this assessment. SoCalGas's storage capacities are continually reassessed in light of performance and the safety-related work planned, in progress, or completed at our storage fields.

#### **Peak Winter Demand Forecast**

Using the pipeline supply and withdrawal assumptions presented in Tables 1 and 2 and the Seasonal Reliability Assessment discussed later in this report, SoCalGas expects to meet both 1-in-10 and 1-in-35 design standards.

Customer demand is not constant over the course of the day, and gas supplies from interstate pipelines travel slowly across the pipeline network at a steady rate. During those times of the day when demand exceeds the pipeline supply, SoCalGas must use supplies from its storage fields to make up the difference. When customer demand is reduced, SoCalGas will reduce the amount of supply taken from its storage fields or inject excess supply into storage to balance supply and demand and avoid overpressuring the system. Because storage supplies are not used at a constant rate for the entire day, the system capacity is often less than the sum of the available pipeline and storage supplies.

## <u>Demand Outlook: 1-in-10 Year Cold Day Event</u>

For the upcoming winter season, SoCalGas forecasts a 1-in-10 year cold day demand of 4.56 BCFD, broken down by customer class in Table 3 below:

Table 3. Customer Demand Forecast, 1-in-10 Year Cold Day Event

Customer Type	Winter Demand (MMcfd)		
Core (including Wholesale Core)	2,901		
Noncore, Non-Electric Generation	741		
Noncore, Electric Generation (EG)	921		
Total	4,563		



SoCalGas expects to have sufficient pipeline and storage withdrawal capacities through the peak demand period to meet the 1-in-10 year cold day demand forecast.

## Demand Outlook: 1-in-35 Year Peak Day Event

SoCalGas forecasts a 1-in-35 year peak day demand of 3.06 BCFD, consisting entirely of core demand<sup>6</sup> per the design standard. With prudent and active management of storage inventory, SoCalGas expects to have sufficient supply and capacity to meet this design standard.

SoCalGas must maintain minimum levels of storage supply throughout the winter season to protect core reliability. Using inventory and withdrawal relationships for the storage fields, SoCalGas has determined the minimum inventory level required at each storage field to produce the needed withdrawal rates for core reliability. These minimum inventory levels are shown below in Table 4. SoCalGas will use curtailment procedures (as necessary) to preserve these minimum inventory levels at all four storage fields throughout the winter season.

Table 4. Month-End Minimum Inventory Requirements for Core Reliability

Storage Field	Month-End Minimum Inventory (BCF)					
	NOV 2025	<b>DEC 2025</b>	JAN 2026	FEB 2026	MAR 2026	
Aliso Canyon	28.5	27.7	24.1	22.7	14.4	
<b>Honor Rancho</b>	15.0	14.6	14.1	8.5	6.0	
La Goleta	8.0	7.9	7.7	7.6	7.5	
Playa del Rey	1.4	1.4	1.3	1.1	0.7	
TOTAL	52.9	51.6	47.2	39.9	28.6	

The Ventura compressor station is necessary to fill the La Goleta storage field, and because of the capacity at the station, if SoCalGas were to draw La Goleta inventory down to near zero inventory, it is expected that the field could not be refilled in the summer 2026 operating season to sufficient levels needed to support winter 2026-27 demand. SoCalGas will therefore manage its system to maintain a minimum of 7.5 BCF at La Goleta through March 2026 and has included that additional inventory in Table 4 above.

# **Seasonal Reliability Assessment**

Using the 2024 CGR forecast for the winter season (November 2025 through March 2026, cold temperature conditions with dry hydro, and hot and average temperature conditions with base hydro) and the inventory levels posted to ENVOY on November 1 (106.6 BCF), SoCalGas has performed a mass balance examining the impact on its storage supplies and our ability to meet customer demand. The mass balance, presented below in Table 5, simply compares forecasted demand against assumed supply and does not account for actual injection and withdrawal capabilities.

<sup>&</sup>lt;sup>6</sup> Retail and wholesale.



Table 5. Monthly Storage Assessment (MMcf)

Month	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Curtailment	
Pipeline Supply	73,860	84,421	91,272	84,819	95,488	Total	
	COLD TEMPERATURE CONDITION						
CGR Monthly Demand	74,488	97,005	89,562	77,017	73,807		
Storage WD	628	12,584	-1,710	-7,802	-11,624		
Mth-end Inv	105,972	93,388	95,098	102,900	114,524		
Min Inv Req	52,900	51,600	47,200	39,900	28,600		
Curtailment	0	0	0	0	0	0	
	AVER	AGE TEMPI	ERATURE (	CONDITION			
CGR Monthly Demand	71,916	91,645	84,891	73,328	71,334		
Storage WD	-1,944	7,224	-6,381	-10,248	-651		
Mth-end Inv	108,544	101,320	107,701	117,949	118,600		
Min Inv Req	52,900	51,600	47,200	39,900	28,600		
Curtailment	0	0	0	0	0	0	
HOT TEMPERATURE CONDITION							
<b>CGR Monthly Demand</b>	69,453	86,263	80,334	69,694	69,021		
Storage WD	-4,407	1,843	-9,436	0	0		
Mth-end Inv	111,007	109,164	118,600	118,600	118,600		
Min Inv Req	52,900	51,600	47,200	39,900	28,600		
Curtailment	0	0	0	0	0	0	

This mass balance assessment is not predicting that all storage fields will be full or nearly full prior to the start of the summer injection season in April 2026. Rather this assessment shows that on a monthly basis under all temperature conditions, SoCalGas expects to have sufficient pipeline receipt capacity and storage inventory to serve all noncore customer demand without curtailment, and without impacting core reliability requirements. These mass balance calculations assume that gas supplies are delivered to the SoCalGas system equal to the assumed pipeline capacities, including utilization assumptions. In this sense, the mass balance provides the most optimistic assessment of the capability to meet demand through the winter season. To the extent that customers are unwilling or unable to deliver supply to the SoCalGas system at these assumed levels, there will be a potential for the curtailment of noncore demand in order to maintain core reliability.