

DOCKETED	
Docket Number:	25-OIR-02
Project Title:	Energy Data Collection - Phase 3 Gas Data
TN #:	268456
Document Title:	PG&E Comments RE Gas Data Rulemaking ISOR & Express Terms
Description:	N/A
Filer:	System
Organization:	Josh Harmon
Submitter Role:	Intervenor
Submission Date:	2/3/2026 3:01:21 PM
Docketed Date:	2/3/2026

*Comment Received From: Josh Harmon
Submitted On: 2/3/2026
Docket Number: 25-OIR-02*

PG&E Comments RE Gas Data Rulemaking ISOR & Express Terms

Additional submitted attachment is included below.



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3 February 2026

California Energy Commission
Docket Number 25-OIR-02
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RE: “Gas Data Rulemaking” - Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection Title 20, California Code of Regulations; Amendments and Adoptions to Sections 1302, 1308, 1309, 1314, 1353, 1382, 1383, 1384.5 in Title 20, Division 2, Chapter 3, Articles 1, 2, and 4.

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission’s (CEC) Gas Data Rulemaking Initial Statement of Reasons (ISOR) and Express Terms, hereafter referred to as the “draft regulations,” docketed on December 19, 2025. PG&E respectfully notes the docket date of these draft regulations, which occurred shortly before the winter holiday period, combined with their broad scope, made it challenging to provide comprehensive feedback by the commenting deadline. PG&E did inquire with CEC staff at the end of December whether an extension to the February 3 deadline was possible.

PG&E recommends that the CEC hold a supplemental workshop or release additional information regarding the specific use cases for each aspect of the draft regulations, which the CEC estimates would result in the submittal of 1,663 new reports every year. The staff workshop held on Tuesday, January 20, consisted of a brief presentation that did not enable stakeholders to fully understand how the CEC plans to use the requested data.

PG&E appreciates the CEC’s desire to better understand the gas system. We seek to be a partner in crafting regulations that will contribute materially to that end, and to minimize efforts that would increase complexity or cost without adding commensurate value. In other areas of CEC inquiry, such as forecasting for data center load growth, CEC and PG&E staff have worked together over multiple Integrated Energy Policy Report cycles to reach a common understanding of the data, establish limits to its applicability, and iterate on the information requested. We believe a similarly collaborative approach in this area would result in a better outcome for the CEC, regulated entities, and ratepayers.

One risk in quickly finalizing these draft regulations without first establishing a shared understanding of the specific use cases and implementation timeline is that the CEC will not have the capacity to amend them if challenges arise. While we provide details in the following paragraphs, below is a brief outline of our concerns:

- Implementation costs will be significantly higher than the CEC predicts and will be borne by ratepayers.

- There is likely little additional analytical value of moving from monthly to daily data.
- Confidentiality risks are likely to require systematic mitigation.
- Some of the draft regulations appear duplicative of California Public Utility Commission (CPUC) reporting obligations.

Implementing the draft regulations will cost significantly more than the CEC predicts – PG&E estimates nearly \$900k in upfront costs and almost \$600k in ongoing annual costs.

PG&E expects that implementing these draft regulations would require a concerted effort from both subject matter and information technology experts over at least four months. Commensurately, we believe that the required funding to implement the draft regulations would be significantly higher than the \$31,412 estimated by the CEC. Even seemingly straightforward modifications will necessitate coding, testing, and IT support.

At a high level, PG&E estimates the initial costs to implement these draft regulations at \$885,000 which would cover implementation, operations, and required Teradata (database) capacity expansion. Ongoing annual operating costs (labor capacity) are estimated at approximately \$585,000. These figures reflect the substantial scope and complexity of the draft regulations.

In addition, PG&E's current workforce is fully engaged with ongoing regulatory compliance, system maintenance, and other operational responsibilities. Reallocating staff to focus on implementing the draft regulations would either require reassigning employees' time or necessitate hiring additional personnel. In either case, introducing new IT work to a full pipeline on short notice is likely to delay existing planned projects, or be delayed itself. Accordingly, PG&E requests the CEC carefully consider the draft regulations' impact on both operational resources and ratepayers.

PG&E requests that the CEC more thoroughly describe the forecasting use cases and value that would be added by moving from monthly to daily gas demand and price data.

In its "Initial Statement of Reasons Gas Data Rulemaking", the CEC describes what it would like to accomplish by moving to daily gas data reporting,¹ but not how it plans to utilize daily data to enhance its gas demand forecast and achieve those goals. PG&E asked for more detail regarding the additional value of daily data in three meetings with CEC Staff on March 27, 2025, June 5, 2025, and January 16, 2026, so we could better understand the problems and contribute to a solution. Without this understanding, PG&E has significant concerns regarding how the CEC will rely on this data. To illustrate, we provide four examples here regarding the potential for inaccuracies that can lead to unusable forecasts.

First, daily meter data does not always align with what is actually billed to customers. This occurs due to numerous factors such as billing true-ups, the calendarization of billed usage, and meter-read corrections which occur later in the process. Accordingly, this data should not be used for any purpose

¹ The CEC is proposing modifications to Subdivisions 1308, 1309, and 1353 to require daily meter-level reporting of customer gas demand. In its justification for these changes, CEC states that, "As California examines the future role of its natural gas infrastructure at ever increasing levels of detail, the CEC needs improved operational data to understand the daily conditions that determine when natural gas is used, which support CEC natural gas hydraulic modeling."

that ultimately leads to an examination of customers' bills either today or in the future. Doing so would risk developing inaccurate conclusions which would be counter-productive to the CEC's stated use case.

Second, developing daily regression-based forecasting models from daily data will lead to inaccurate results. This is because the variance in daily gas demand is very large, which, in turn, would lead to very large error terms in the regressions used to develop econometric models. More specifically, models that use econometric regression, which the CEC uses in their IEP system-level gas demand forecasts², are sensitive to inputs and prove less useful when the variance cannot be explained. At the daily level, customer demand is driven by factors that cannot be fully accounted for, which could lead to inaccurate forecasts.

Third, historical data is not always indicative of future behavior. For example, the largest driver of Core gas demand change accounted for in long-term gas demand forecasts is building electrification. Since electrification is driven by future policy and actions and has not yet been observed in historical gas demand, using daily meter data to inform forecasts will not be able to account for the impacts of building electrification. It is unclear what value forecasting at the daily level provides given the longer-term forecast is not well correlated to recent daily demand.

Finally, Section 1308(e) lacks clarity in its request for daily natural gas Citygate prices. PG&E Citygate is only one of several procurement points, so it is unclear how collecting data from a single location will improve forecasting or policy analysis. Section 1308(e) also specifies prices in thousand cubic feet, even though natural gas is priced in dollars per million British thermal units. Additionally, PG&E purchases gas at fixed and indexed prices using proprietary market data, which cannot be disclosed without explicit permission from those providers; we provide further detail on this below. As written, Section 1308(e) appears too vague to support accurate forecasting or policy analysis.

Given the reasons above and the lack of specifics from the CEC regarding the need for daily metered gas demand data and price data, PG&E requests an opportunity to work closely with CEC staff to better understand the need and use cases for this data, particularly the actual use cases incorporating daily meter data and natural gas price data into CEC staff forecasts.

Confidential data must be protected.

The proposed gas metering, consumption, sales and asset specific data proposed to be collected under the draft regulations is similar to confidential gas customer, metering, procurement, and asset data protected by the CPUC under SB 1221 and other confidentiality requirements.³ The data to be collected under the draft regulations may include confidential customer-specific and/or personally-identifiable data, competitively-sensitive and market-sensitive gas procurement, consumption or electric generation data, trade secret data, and/or cyber-security and/or physical security sensitive data. As with confidential data provided by gas operators to the CPUC, the data provided to the CEC under regulations requires protection from disclosure.

² See slide 38. CEC calibrates their Residential model to an econometric model and specifically uses econometric models for Commercial and Industrial.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=268076&DocumentContentId=105092>

³ See Pub. Util. Code Section 583(a) and CPUC General Order 66-D.

Prior to implementation of any final CEC regulations, PG&E would file requests for confidentiality and protection under the Commission's confidentiality regulations (Title 20 Cal. Code Regs. Section 2505 et sec.) to protect confidential data from public or third-party disclosure. We may also seek a categorical confidentiality determination on an ongoing basis, if possible, to protect the data in the event of repeated submittals, and we would welcome ideas from the CEC on how to avoid a need for individual confidentiality applications for repeated data submittals.

Separately, the proposed new language in Section 1308 requests daily natural gas Citygate prices. This information is provided by market data providers, such as Platts Gas Daily and Natural Gas Intelligence, and the data can be obtained directly from them. Inclusion of this data by each investor-owned utility (IOU) may violate proprietary and/or copyright access agreements with market data providers unless the data providers expressly agree to such disclosure. PG&E currently submits confidential gas transaction data to the CPUC. PG&E recommends that CEC staff seek further stakeholder insight on this topic to understand the CPUC's process for obtaining this type of proprietary market data and the confidentiality protections that are implemented.

The CEC's request for gas asset data appears duplicative of existing reporting to the CPUC within the Gas Transition OIR (R.24-09-012).

PG&E requests that the CEC avoid duplicating the confidential and non-confidential gas asset mapping data previously submitted to the CPUC and made available on PG&E's website during the SB 1221 phase of the Gas Transition OIR⁴. PG&E believes that this data set⁵ is comprehensive enough to enable the CEC to achieve most, if not all its objectives regarding gas asset information.

Separately, CEC staff could obtain data from the CPUC that PG&E currently reports to that agency, which would eliminate the need to submit redundant data sets. This approach would align with recommendations in the Joint Agency White Paper⁶, specifically section 9 on page 42, which recommends enhanced interagency collaboration on gas transition matters.

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PG&E appreciates the opportunity to comment on this rulemaking and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations

⁴ [SB 1221 Implementation](#)

⁵ For a list of data points, please refer to the User Guide located in the Info/Help menu in the top right corner on the [SB 1221 Map](#).

⁶ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M525/K660/525660391.PDF>