

| DOCKETED | |
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| Docket Number: | 25-OIR-02 |
| Project Title: | Energy Data Collection - Phase 3 Gas Data |
| TN #: | 268457 |
| Document Title: | Megan Silva Comments - SoCalGas Comments on Title 20 Data Collection Regulations Phase 3 |
| Description: | N/A |
| Filer: | System |
| Organization: | Megan Silva |
| Submitter Role: | Public |
| Submission Date: | 2/3/2026 3:22:52 PM |
| Docketed Date: | 2/3/2026 |

Comment Received From: Megan Silva
Submitted On: 2/3/2026
Docket Number: 25-OIR-02

**SoCalGas Comments on Title 20 Data Collection Regulations Phase
3**

Additional submitted attachment is included below.



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February 3, 2026

Jason Orta
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Comments on Docket Number 25-OIR-02 - Title 20 Data Collection Regulations - Natural Gas System and Metered Consumer Usage; Renewable Natural Gas; and Metered Electricity

Dear Mr. Orta,

Southern California Gas Company (SoCalGas) appreciates the opportunity to submit comments on the California Energy Commission's (CEC) workshop on Title 20 Data Collection Regulations - Phase 3 - Natural Gas System and Metered Consumer Usage, Renewable Natural Gas, and Metered Electricity Use, held on January 20, 2026.

Comment #1: Section 1308. Quarterly Gas Utility and Electric Generator Tolling Agreement Reports

- The following compressor stations should be removed as they have been abandoned.
 - (x) Rainbow compressor station
 - (xi) Dana Point compressor station

Comment #2: Section 1314. Natural Gas System Analysis

- (a) Each gas utility with annual natural gas deliveries of 200 million therms or more in both of the two calendar years preceding the required data filing shall, on August 1, 2019 and on March 15 every year thereafter, via secure electronic method, provide files that are used by the gas utility to conduct gas hydraulic modeling for its natural gas system during the previous calendar year, including the scenarios (1) - (4) below:
- (1) average summer day (~~June~~ April through ~~September~~ October);
 - (2) average winter day (November through March);
 - (3) 1-in-10 peak summer and winter day; and

(4) any additional summer and winter day representing demand higher than that identified in subdivisions (1)-(3) above.

Each March we provide the CEC with the demand scenarios that SoCalGas and SDG&E use for its gas transmission system planning: the peak summer demand forecast, the 1-in-10-year cold day winter demand forecast, and the 1-in-35-year peak day winter demand forecast for the upcoming summer and winter operating seasons. Since we have not identified a business reason to prepare and model average demand conditions in either operating season, and do not regularly examine conditions greater than those provided, the data does not exist.

Conclusion

We appreciate the opportunity to provide feedback. Given the evolving policy landscape and the inherent uncertainties in long-term projections, it is crucial that forecasting methodologies reflect realistic and practical scenarios. While we support the effort to increase access to transparent data to better inform the state's energy planning, we believe the California Gas Report should remain the foundational planning document for gas system planning. We look forward to continued engagement with the CEC to support state policies that promote affordability, reliability, and a balanced approach to California's energy future.

Respectfully,

/s/ Megan Silva

Megan Silva
Regulatory Affairs Manager