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CALIFORNIA ENERGY COMMISSION
715 P Street
Sacramento, California 95814

energy.ca.gov

FINAL STATEMENT OF REASONS

Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection
OAL Z # 2025-1209-02
Docket No. 25-OIR-02

INTRODUCTION

Government Code section 11346.9(a)(1) requires the Final Statement of Reason to include an update of the information contained in the Initial Statement of Reason (ISOR). Other than the updates noted below, no other updates to the ISOR are necessary and all items from the ISOR that are not addressed below are incorporated by reference. Unless otherwise noted, the updates below are intended to supplement, not supersede, the purpose and necessity statements included in the ISOR.

UPDATE OF THE INITIAL STATEMENT OF REASONS

In response to comments received during public comment periods, the following changes were made to the proposed regulatory language, and the language was adopted by the California Energy Commission on March 12, 2026:

SECTION 1302. Rules of Construction and Definitions.

Section: Subdivision 1302(b)(82)
Summary of Change and Specific Purpose: The specific purpose of the change within 1302(b)(82) is to correct incorrect language that does not match existing regulatory language.
Necessity: This change is necessary to correct errors and have unamended portions of the express terms match existing regulatory language.

SECTION 1308. Quarterly Gas Utility and Electric Generator Tolling Agreement Reports

Section: Subdivision 1308(a)(2)(B)
Summary of Change and Specific Purpose: The specific purpose of the change within 1308(a)(2)(B) is to remove two reporting locations from the existing requirement and to correct the numbering format.
Necessity: This change is necessary to respond to written comments received on February 3, 2026 from SoCalGas. The CEC was informed from those comments that two of the compressor stations listed in subsection (B) have been abandoned. The CEC is removing these two listed locations and is making the renumbering edits to

accommodate those changes, as well as correcting the numbering format for consistency.

Section: Subdivision 1308(b)(6)(A)
Summary of Change and Specific Purpose: The specific purpose of the change within 1308(b)(6)(A) is to correct incorrect language that does not match existing regulatory language.
Necessity: This change is necessary to correct errors and have unamended portions of the express terms match existing regulatory language.

Section: Subdivision 1308(b)(6)(B)
Summary of Change and Specific Purpose: The specific purpose of the change within 1308(b)(6)(B) is to correct incorrect language that does not match existing regulatory language.
Necessity: This change is necessary to correct errors and have unamended portions of the express terms match existing regulatory language.

SECTION 1309. Quarterly Interstate Pipeline Company Reports.

Section: Subdivision 1309(b)
Summary of Change and Specific Purpose: The specific purpose of the change within 1309(b) is to correct typographical errors with formatting in the express terms.
Necessity: This change is necessary to have the express terms match changes that were accurately described in the Initial Statement of Reasons.

SECTION 1353. Disaggregated Demand Data.

Section: Subdivision 1353(b)
Summary of Change and Specific Purpose: The specific purpose of the change within 1353(b) is to correct typographical errors with formatting in the express terms.
Necessity: This change is necessary to have the express terms match changes that were accurately described in the Initial Statement of Reasons.

Section: Subdivision 1353(b)(1)(G)(ii)
Summary of Change and Specific Purpose: The specific purpose of the change within 1353(b)(1)(G)(ii) is to add clarification to the rates provided by the UDC for later linkage to other data obtained by the CEC. Rate schedules describe a system of charges based on different customer properties, including baseline territory. Without knowing those properties, we can know the overall rate schedule a customer is billed under but not the actual rates they are charged.
Necessity: This change is necessary to better understand the rates provided by the UDCs by designating the lowest rate paid by that meter. Baseline territory will allow us to identify the specific rates a customer is charged within a given rate schedule, which is necessary for analyses related to billing amounts and customer interactions with different rates.

Section: Subdivision 1353(b)(1)(G)(iii)
Summary of Change and Specific Purpose: The specific purpose of the change within 1353(b)(1)(G)(iii) is to add clarification to the rate schedule provided by the UDC and allow for linkage to other data obtained by the CEC.
Necessity: This change is necessary to better understand the rate schedules provided by the UDCs and allow the CEC to link this data to other datasets to lessen the reporting burden on the reporters.

Section: Subdivision 1353(b)(1)(F)
Summary of Change and Specific Purpose: The specific purpose of the change within 1353(b)(1)(F) is to add information to allow the CEC to link this information to other UDC data to reduce the reporting burden to these reporters.
Necessity: This change is necessary to better understand the rate schedules provided by the UDCs and allow the CEC to link unique rate identification number data to other datasets to lessen the reporting burden on the reporters.

SECTION 1383. Hydrogen Plant Data.

Section: Subdivision 1383(b)(3)
Summary of Change and Specific Purpose: The specific purpose of the change within 1383(b)(3) is to correct incorrect language that does not match existing regulatory language.
Necessity: This change is necessary to correct errors and have unamended portions of the express terms match existing regulatory language.

SECTION 1384.5. RNG Plant Data

Section: Subdivision 1384.5(b)(3)
Summary of Change and Specific Purpose: The specific purpose of the change within 1384.5(b)(3) is to add clarification to reporting entities as to how to report “comingled” products received from outside sources.
Necessity: This change is necessary to respond to comments received at the January 20, 2026 workshop indicating a need to clarify to reporting entities regarding the handling of “comingled” products received from outside sources. As a reporting entity may have no reasonable way of knowing the precise compositions of the feedstocks being used to produce renewable natural gas, the CEC modified the regulation to allow reporting entities to provide ratioed estimates of the comingled feedstock to indicate the usage of that type of product and then, additionally, provide the total amount used of the mixed product.

Section: Subdivision 1384.5(b)(4)
Summary of Change and Specific Purpose: The specific purpose of the change within 1384.5(b)(4) is to add clarification to reporting entities on where to determine the point of distribution.
Necessity: This change is necessary to respond to written comments received on February 3, 2026 from the RNG Coalition, which indicate the potential for

misunderstanding in the level of detail of data being required with regard to the amount of produced renewable natural gas to be later distributed. To address this potential misunderstanding, the CEC added language to clarify where the point of distribution is determined. Specifically, distribution will be the point at which the reporting entity no longer has physical control over the product.

LOCAL MANDATE DETERMINATION

The proposed regulations do not impose a mandate on local agencies or school districts that requires state reimbursement pursuant to Government Code Sections 17500 et seq.

CONSIDERATION OF REASONABLE ALTERNATIVES, INCLUDING THOSE THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS

The CEC determined pursuant to Government Code section 11346.9(a)(4) that no alternative before it would be more effective in carrying out the purpose for which this action is proposed; no alternative would be as effective as and less burdensome to affected persons than the adopted regulations; and no alternative would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

The adopted regulations will not have a significant adverse economic impact on small business and no alternatives were proposed that would lessen any adverse economic impact on small business.

The CEC considered the following alternatives:

Under alternative one, the CEC considered not updating the data collection regulations. However, not updating the standards would not help attain California’s climate and energy efficiency goals by denying the CEC information on the influences of new technologies on the energy markets and systems and prevent accurate forecasting and analysis of climate and energy efficiency policy.

Under alternative two, the CEC considered estimating energy information and creating simulated data to perform policy analysis and forecasting. In many cases, this estimated and simulated data has been used in past reports and analyses to complete CEC tasks. Yet over the years, this type of information has been routinely criticized as inaccurate and misleading, calling into question policy recommendations by the CEC. While the CEC continues to improve its data analysis techniques, it has concluded that best practice is to obtain point specific information where possible to avoid the accuracy challenges of simulated data and improve analysis when possible.

TECHNICAL, THEORETICAL, OR EMPIRICAL STUDIES, REPORTS, OR SIMILAR DOCUMENTS

The CEC has relied upon the following technical, theoretical, or empirical studies, reports, or similar documents in drafting the proposed regulations:

1. Staff from the California Energy Commission, California Public Utilities Commission. 2024 Joint Agency Staff Paper: Progress Towards a Gas Transition: A White Paper Supporting the CPUC's Long-Term Gas Planning Rulemaking R.20-01-007. https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M525/K660/525660391.PDF.
2. California Energy Commission. Order Number 22-0309-7 Order Instituting Rulemaking in the matter of Decarbonizing the Gas System. https://efiling.energy.ca.gov/GetDocument.aspx?tn=242287&DocumentContentId=75788.
3. Bailey, Stephanie, Jennifer Campagna, Mathew Cooper, Quentin Gee, Heidi Javanbakht, and Ben Wender. 2023. 2023 Integrated Energy Policy Report. California Energy Commission. Publication Number: CEC-100-2023-001-CMF. https://efiling.energy.ca.gov/GetDocument.aspx?tn=254463.
4. United States Environmental Protection Agency Website: Section on Renewable Natural Gas from Agricultural – Based AD/Biogas Systems. https://www.epa.gov/agstar/renewable-natural-gas-agricultural-based-adbiogas-systems#:~:text=Information%20on%20RNG-,What%20is%20Renewable%20Natural%20Gas?,than%20from%20fossil%20fuel%20deposits.
5. California Occupational Employment and Wage Statistics, Bureau of Labor Statistics, May 2024: https://data.bls.gov/oes/#/area/0600000.

All documents relied upon were made available upon request directly from the CEC throughout the course of this rulemaking action. Any documents additionally relied upon since the initial publication of this rulemaking action were also made available for public review in compliance with Government Code Section 11347.1.

INFORMATIVE DIGEST

The CEC finds that no revisions to the proposed regulations have been made that would warrant a change to the informative digest contained in the Notice of Proposed Action.

Difference from existing comparable federal regulation or statute:

The proposed regulations are neither inconsistent nor incompatible with existing federal regulations or statutes. The proposed regulations adopt or amend requirements for consistency with existing federal regulations or statutes and other definitions to ensure ease of reporting and consistency of reported information.

Broad objectives of the regulations and the specific benefits anticipated by the proposed amendments:

The proposed regulations will benefit CEC energy analyses, the health, welfare, and safety of California residents, and the state's environment by improving the breadth of data the CEC can use for its analysis. Specifically, collection of natural gas and alternative fuel data will improve CEC's modeling and analytical work and provide a better understanding of key energy supply and consumption trends that could significantly impact Load Serving Entities' (LSE) short-term electricity procurement obligations, as well as inform long-term investment decisions related to the transmission and distribution systems made by California Independent System Operator (CAISO) and Utility Distribution Companies (UDCs).

Consistency or compatibility with existing state regulations:

The CEC has determined that there are no existing comparable state regulations or statutes. Therefore, the CEC has determined that the proposed regulations are neither inconsistent nor incompatible with existing state regulations.

SUMMARY OF RESPONSES TO PUBLIC COMMENTS RECEIVED

All responses to timely public comments, including acceptance of recommendations and justification when recommendations were not accepted, are appended to this Final Statement of Reasons, and included in the final rulemaking record. The CEC acknowledges that it received untimely comments and, as it has no legal obligation to respond to them, is not including them in the record. The CEC appreciates its stakeholders' input and will continue to engage with them on these regulations and on other issues that have been raised but are outside the scope of this rulemaking.

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715 P Street
Sacramento, California 95814

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WRITTEN COMMENTS RECIEVED

Data Collection for Natural Gas, Renewable Natural Gas, and Gas Meter Data Regulations
OAL Z # 2025-1209-02
Docket No. 25-OIR-02

45-Day Written and Oral Comments Received:
December 19, 2025, through February 3, 2026
Public Workshop held January 20, 2026

15-day Comments Received:
February 9, 2026, through February 25, 2026
Public Hearing held March 12, 2026

Commenter(s) Name(s)	Comment type	Organization	Assigned number
Steve Uhler	Individual written comment	Citizen	1
Sam Wade	Public Workshop comment	Coalition for Renewable Natural Gas	2
Eric Fournier	Public Workshop comment	California Center for Sustainable Communities at UCLA	3
Kelly Bott	Individual written comment	PureWest	4
Josh Harmon	Individual written comment	Pacific Gas and Electric	5
Megan Silva	Individual written comment	SoCal Gas	6
Sam Wade	Individual written comment	RNG Coalition	7

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1.1	Perhaps energy from biomethane use will be double counted? Please reference the system for tracking and verifying the use of biomethane under RPS, in the express terms.399.12.6. (d) PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33 (d) All sellers and purchasers of biomethane shall comply with a system for tracking and verifying the use of biomethane, as established by the Energy Commission, that is equivalent to the system required by subdivision (c) of Section 399.25. 399.25. (c) PUC-ARTICLE 16. California Renewables Portfolio Standard Program 399.11-399.33 (c) Establish a system for tracking and verifying renewable energy credits that, through the use of independently audited data, verifies the generation of electricity associated with each renewable energy credit and protects against multiple counting of the same renewable energy credit. The Energy Commission shall consult with other western states and with the WECC in the development of this system.	The proposed regulations do not create a double counting situation. The RPS program, per the listed articles, only collects information on renewables provided for electricity generation. The proposed regulation applies to all RNG production within California regardless of its use, expanding the coverage of the data reporting. If counts from both programs were used then double counting would occur, but the CEC has no intention of cross contaminating those numbers. The only potential overlap identified with the RPS program is that certified RPS facilities are required to report monthly information on injections of RNG to be delivered to an RPS-certified power plant using a common carrier pipeline.
1.2	Perhaps CCR 20 Section 2507. Disclosure of Confidential Records should be included in the 25-OIR-02 rulemaking to ensure references remain correct? Use of the terms "End User" and "Customer" appear inconsistent when the term "end use customer" is used. Express terms state an End user means any company that consumes electricity or natural gas for its own use and not for resale. It also states "Customer" means an active billed account, of a UDC, an LSE, or a gas utility. Section 1350. Exemptions. (b)(2) "Small gas utility" means a gas	It is unclear what is being asked for here. But the CEC has included as part of this package definitions that would be relevant to Title 20, Chapter 3, Articles 1 and 2. These definitions are tailored to fit industry and staff understanding and usage. Section 2507 is found in Title 20, Chapter 7, Article 2 and is specific to that section. Additionally, none of the proposed changes as part of this rulemaking proceeding uses the term "end-use customer" thus this comment is not relevant to this rulemaking.

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	utility that has delivered 50 billion cubic feet of natural gas or less to end use customers in both of the two calendar years preceding the required filing date.	
1.3	Please file in docket 25-OIR-02, the OAL approved Form 400 with OAL File Number that was submitted and approved to publish notice of the rulemaking in the California Regulatory Notice Register.	The CEC appreciates the public interest in its rulemaking process. The CEC will docket the Form 400 when the rulemaking is approved.
2.1	Really applaud the CEC for, looking to gather better data on the RNG produced and used in California. We think that's an important exercise, and are happy to make our members available to assist in crafting good rules for collecting solid data.	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments.
2.2	On initial review, we just had some minor feedback or suggestions, with Section 1384.5. First, just that, at times, the amount of feedstock used to produce the RNG might be difficult to determine. For example, landfills accept waste that they, you know, put into various cells, and they know the amount of total waste being deposited in the landfill in any given time period, but they can't directly tie that to an individual unit of gas produced. In the case of contained anaerobic digesters, it is easier in some respects to show how much feedstock goes in and how much gas goes out. But sometimes feedstocks are commingled, and feedstocks like animal manure and food waste produce different amounts of gas for the same mass of input feedstock. So, just want to make the CEC	The CEC appreciates the feedback and will make the following amendment to the Express Terms by adding the following to Section 1384.5(b)(3) *<u>(A) for products that are comingled prior to the producer receiving the feedstock, producers should provide a ratio estimate of those comingled products.</u>*

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	aware of some of those complexities right out the gate.	
2.3	And then, turning to the end uses of the gas, we'd just like to see a little bit more clarity in the language about how reporters are supposed to connect the amount of RNG sold to the amount sort of assigned to each of these end uses. For example, basically almost all RNG is injected into gas utility systems, but then it can be used, in fueling stations after that, it can go to a power plant, it can go to an industrial facility, etc. So, just how to best align the volumes reported, into category D, gas utility systems, with those other end uses. Clarity around that would be appreciated. And I'll pause there. Thank you.	CEC staff envisioned that this would be based on the knowledge of the reporter. If the producer injects all of its RNG into a gas utility system, then that's what would be reported. If the producer has an arrangement with a fueling station, power plant or other user, enter the appropriate entity. To make this understanding clearer, the CEC added language to the Express Terms within section 1384.5(b), adding clarity to the point of distribution to address this concern.
3.1	Yes, hi, my name is Eric Fournier, I'm the Research Director at the California Center for Sustainable Communities at UCLA. My recommendation relates to the interaction between infrastructure data for gas and the usage data that would be collected. It could potentially be very valuable to obtain a mapping customer premises to individual infrastructure assets if CEC is requesting asset-level data for the infrastructure.	It is unclear what is being asked for here. If this applies to interval meter data information, the proposed regulations require reporting of the latitude and longitude of the meter. If it is gas deliveries, by interstate pipelines to California or its borders, CEC is proposing to request daily information on how much gas is delivered to that point.

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3.2	Otherwise, that's not as much of a concern if that data is going to be aggregated to some other job. So, to the extent to which asset-level data is being requested, I would strongly recommend having a sort of specific delineation of which customers are served by which piece of infrastructure.	With the additional information obtained from this rulemaking, the CEC will likely be able to identify which pieces of infrastructure supplies certain customers. This functionality is dependent on the quality of the data received from the reporting entities. In gathering and storing asset-level utility information, the CEC would likely deem this information to be business sensitive information and will follow established processes and procedures. Many of these processes and procedures are defined and stated in regulations found in Title 20, Division 2, Chapter 7, Article 2.
4.1	PureWest Energy (PureWest) appreciates the opportunity to comment on the proposed changes to Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection. PureWest encourages CEC to take steps through this rulemaking and others to highlight opportunities to reduce greenhouse gas (GHG) emissions associated with California's natural gas supplies through the use of verified low-carbon gas. We urge you to coordinate efforts directly with the California Air Resources Board (CARB), California Public Utilities Commission (CPUC), Department of General Services (DGS) and other relevant agencies to increase access to verified low-carbon gas and support the state's energy priorities.	The CEC appreciates PureWest's participation in this rulemaking activity. The CEC regularly coordinates with the CPUC and CARB to develop strategic plans for reducing fossil gas demand and planning for the future of the pipeline system that delivers fossil gas to end-use customers today. Per the 2024 Joint Agency Staff White Paper: Progress Towards A Gas Transition A White Paper Supporting the CPUC's Long-Term Gas Planning Rulemaking R.20-01-007: "Three State agencies—the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and California Air Resources Board (CARB) ...are closely coordinating to develop strategic plans for reducing fossil gas demand and planning for the future of the pipeline system that delivers fossil gas to end-use customers today."

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4.2	**Verified Low-Carbon Gas Offers Significant Opportunity for California** California is a leader in detecting and mitigating methane emissions, including from the petroleum and natural gas sector. However, according to CEC data, more than 90 percent of California's natural gas supplies come from out of state, which is responsible for more fugitive methane emissions than all oil and gas production, transmission and distribution operations in California. CARB's Short-Lived Climate Pollutant Reduction Strategy recognizes that more can be done to maximize the environmental benefits associated with natural gas supplying the state. Reducing methane emissions from petroleum and natural gas production is one of the most cost effective climate strategies available, because avoided methane emissions equates to additional gas that is captured and sold. Accordingly, best practices related to minimizing methane emissions and MMRV are widely – but not universally – deployed in the market today. We encourage the CEC and other state agencies to take steps to ensure continued progress in utilizing best practices to reduce methane emissions from the state's natural gas supplies. In particular, as you finalize and implement the Phase 3 Gas Data Collection, we urge you to: • Coordinate with CARB related to implementation of the state's climate programs and natural gas emissions accounting programs, including pursuant	The CEC appreciates PureWest's participation in this rulemaking activity. The CEC regularly coordinates with the CPUC and CARB to develop strategic plans for reducing fossil gas demand and planning for the future of the pipeline system that delivers fossil gas to end-use customers today. Many of the analytical requests listed in this comment are addressed through those meetings or by the IEPR development process more directly. The CEC encourages PureWest to participate in those venues directly as these requests are more appropriate for those activities. Per the "2024 Joint Agency Staff White Paper: Progress Towards A Gas Transition A White Paper Supporting the CPUC's Long-Term Gas Planning Rulemaking R.20-01-007", "Three State agencies—the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and California Air Resources Board (CARB) (referred to as the "joint agencies")—are closely coordinating to develop strategic plans for reducing fossil gas demand and planning for the future of the pipeline system that delivers fossil gas to end-use customers today."

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	to AB 1496 and AB 2195, in order to support more robust accounting of emissions associated with natural gas use in California and identify opportunities to support the use of verified low-carbon gas. • Consider allowing and encouraging producers of verified low-carbon gas, with an emissions intensity verified to be below 0.2% through established MMRV protocols, to report on production and use of verified low-carbon gas, similar to proposed reporting requirements for renewable natural gas plants. • Through future Integrated Energy Policy Reports and other efforts, highlight opportunities to further reduce emissions associated with the state's natural gas use in buildings, the power sector, and other end uses through the use of verified low-carbon gas. • Coordinate with DGS, CPUC, CARB, utilities and others to identify cost-effective opportunities to increase access to verified low-carbon gas for California residents and businesses and further reduce emissions associated with state buildings and operations.	
5.1	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	The CEC appreciates PG&E participation in this rulemaking activity. The CEC agrees that open communication is always desired and has met with PG&E discussing data needs and concerns on numerous occasions over the past year (2025 into 2026). Staff is always available to discuss issues with data submitting stakeholders.

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	inquire with CEC staff at the end of December whether an extension to the February 3 deadline was possible.	
5.2	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.	The CEC appreciates PG&E participation in this rulemaking activity. During the January 20 Workshop, staff's presentation had slides that addressed each section for the Express Terms, with the specific ask for comments on each section. PG&E had the opportunity to ask any specific question on those terms at that time as well as ask those questions in written form. Additionally, the ISOR was available at the time of the workshop and contained specific purpose and necessity statements for each proposed regulatory change. The CEC acknowledges that the 1,663 reports are across 464 businesses, which results in an average of less than four reports per business per year.
5.3	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	The CEC appreciates PG&E's participation in this rulemaking activity and PG&E's ongoing participation in CEC analysis and forecasting. Staff have always been open to meetings and discussions regarding its analytical, forecasting, data collection, and rulemaking activities and will continue to do so. Additionally, staff did meet with PG&E prior to opening rulemaking activities to seek PG&E input on the proposed data collection.

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	outcome for the CEC, regulated entities, and ratepayers.	
5.4	**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	Total costs estimated by the CEC for implementation of this proposed regulation package is $14,575,168, with $31,412 being the average cost per business (464 businesses). For natural gas utilities such as PG&E, only two (2) entirely new reporting requirements are being created with these reports requiring data that is known to exist as part of normal business operations. Primary changes to existing reports involve reporting daily intervals of information versus the current monthly interval specification. Current monthly reports are created via the summation of daily internal reports. Staff asserts that PG&E records these daily events as part of normal business auditing and accounting activities and can easily report that data to comply with these regulations. CEC staff also notes that PG&E provides the daily natural gas interval meter data to customers as part of their "Energy Usage Tools", thus making it hard to understand why new databases and reporting costs would need to be incurred as this is the largest portion of the data submission. Having these services already available to

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	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.	customers implies that PG&E already has a developed database warehousing the requested information and a standard query program to retrieve the requested information. Since this program has already been implemented, the CEC anticipates minimal to no additional costs to occur from this change.
The CEC anticipates minimal to no costs 5.5	**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 that ultimately leads to an examination of	CEC staff have created forecasts and analysis to respond to California agency needs for over thirty years. Throughout that period, the CEC has constantly had to modify and adapt those forecasts to new energy realities. In recent years, this adaptation has been more prevalent as the sources and transmission of energy sources have changed. Within the ISOR released on December 19, 2025, CEC staff described their forecasting and analytical needs to respond to California state agencies' requests for its expertise. The following description is found on page 3: "Per the 2024 Joint Agency Staff Paper: Progress Towards a Gas Transition: A White Paper Supporting the CPUC's Long-Term Gas Planning Rulemaking R.20-01-007 (Joint Agency White Paper), 'Fossil gas heats our homes and buildings, powers our industrial and agricultural sectors, and produces electricity—but at a cost to climate and public health. Today, fossil gas is a key pillar of the State's energy system. In fact, the State consumes about 2,131 trillion British thermal units (BTU) of fossil gas per year, more

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	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 IEPR system-level gas demand forecasts, 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	than twice the 904 trillion BTU it consumes in electricity. However, achieving California's ambitious climate targets, including economy-wide carbon neutrality by 2045 requires a monumental shift away from this fossil fuel.' Assessing the various pathways to a decarbonized energy system presents formidable challenges. The CEC's Order Instituting Informational Proceeding, order No. 22-0309-7, 'Decarbonizing the Gas System,' says the following need to be improved to assess the gas transition: • Natural gas demand forecasts • Natural gas price, rate, and revenue forecasts • Natural gas infrastructure assessment." As planning and forecasting has become intertwined, the requirement for more detailed information is abundantly clear. California policy makers demand knowing the pros and cons of any policy decision they approve which necessitates the detailed information being asked for in this package to properly describe, account for, and communicate the data underlying policy decision points the CEC is being directed to answer. The 2024 Joint Agency Staff Paper: Progress Towards a Gas Transition identifies the following as an ongoing effort: "CEC initiatives to build upon forecasting capabilities for gas system planning and assessments, complementing and independently validating modeling conducted by

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	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.	the gas utilities and informing interagency gas planning." A foundational component of the state's energy planning is the CEC's California Energy Demand Forecast. The demand forecast is a set of several forecasting products that are used in various energy planning proceedings, including the CPUC's oversight of energy procurement and the California ISO's transmission planning. The CEC's Order Instituting Informational Proceeding, order No. 22-0309-7, "Decarbonizing the Gas System," now provides an important avenue for analysis to inform long-term planning during the gas transition. As part of the proceeding, the CEC is expanding existing data and analytics, including forecasts and assessments of gas demand, supply, transportation, price, rates, reliability, and efficiency to provide input for gas system planning. Some of these improvements are underway, and others will be implemented over the next couple of years. Improvements include forecasting daily gas demand under peak cold day conditions, better assessing the impact of decarbonization efforts, and enhancing hydraulic modeling of the gas system. The demand forecast includes annual consumption forecasts to 2040 for electricity and gas by customer sector. However, annual consumption forecasts of gas demand are not sufficient to support the state's gas planning efforts. Within a year on a gas system, demand peaks in the winter and storage withdrawals are

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		needed to meet demand. During the summer season, storage fields receive injections of gas. Daily data is needed to support planning activities so that there is enough gas infrastructure to meet these swings in demand during the gas transition. If the infrastructure is overbuilt, the high cost burden falls to a declining rate base. But enough gas infrastructure is needed to allow for safe and reliable service. During the gas transition, there will be more heating from electricity due to building electrification. What will be the impact to gas power plants in the future as winter gas system use shifts from residential and small commercial customers to increased power plant demand? For reliability assessments, the CEC has developed peak day and monthly gas demand forecasts. As gas systems, as required by CPUC regulations, are required to meet peak day needs, the state will need to develop better forecasts of what peak days will look like during the gas transition. Daily demand data also helps with better understanding the temperature, precipitation, and economic variables that shape gas demand. Additionally, daily demand and pricing data will help the state better understand changes in prices, particularly seasonal price spikes. As high prices and high levels of demand can continue over a span of several days, daily historical data is crucial to help understand those trends and develop improved forecasting products. As California examines the future role of its natural gas infrastructure at ever increasing levels

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		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. These daily conditions include intraday peaks on the gas system in which gas power plants require additional fuel to meet evening demand for electricity. These peaks are more pronounced as higher proportions of renewables such as solar meet electricity demand in the morning and afternoon. Per the US Energy Information Administration, citygate prices represent the total cost paid by gas distribution companies for gas received at the point where the gas is physically transferred from a pipeline company or transmission system. This price is intended to reflect all charges for the acquisition, storage, and transportation of gas as well as other charges associated with the gas distribution company obtaining the gas for sale to consumers. Citygate prices, along with gas hub prices obtained by the CEC will be used to calibrate the model that the CEC will use for commodity gas price forecasting. When the citygate prices are overlaid with temperatures and compared to prices at or near production areas, patterns can be identified. While prices in the regulations are specified at thousand cubic feet, an analyst can use spreadsheets to convert prices to the needed units. The prices that the

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		CEC is asking for are average prices for a given day. These averages could be some combination of various fixed and indexed prices among several transactions that occurred during that day.
5.6	**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. 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. 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.	The CEC has processes in place to address confidential information consistent with the Government Code sections 7920.000-7931.000. PG&E acknowledges this within this comment. Data providers are encouraged to identify categories of data they believe are confidential and the rationale for confidentiality. Additionally, the CEC currently administers data collection programs of confidential and business sensitive information. For many of these data collection programs, they have been administered for over 40 years with the Quarterly Fuels and Energy Reports (CCR Title 20, Chapter 3, Article 1) and the Petroleum Industry Information Reporting Act (CCR Title 20, Chapter 3, Article 3) serving as examples. SB 1221 has a sunset date of January 1, 2031. Staff reviewed the CPUC decisions that require the filing of transaction information with the CPUC. Under CPUC Decision 97-10-065, PG&E files a Gas Procurement Rate Tariff Changes report, which is updated monthly. That decision does not explicitly require filing of daily citygate prices for these reports. Although, the comments presented here do not identify the "confidential gas transaction data" that it submits to the CPUC

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	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.	along with the name of the Advice Letter filings, corresponding excel tabs, and cells with such data along with the CPUC contacts who receives such information, the CEC did contact the CPUC to verify what information is collected. CPUC staff indicated that it does not collect the daily price and transaction information proposed in Section 1308.
5.7	**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 OIR. PG&E believes that this data set 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 Paper, specifically section 9 on page 42, which recommends	SB 1221 data will not meet all of the requirements of the proposed regulations. If that data includes modifications to gas systems in the past year, it can be accepted to comply with a portion of regulations. SB 1221 applies to neighborhood decarbonization and that will not include modifications to gas transmission systems. Furthermore, SB 1221 has a sunset date of January 1, 2031. Pilot decarbonization pilots cannot be established after January 1, 2030. As the gas transition will continue past those dates, the CPUC's SB 1221 proceeding is not a usable vehicle to get information.

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	enhanced interagency collaboration on gas transition matters.	
6.1	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. o (x) Rainbow compressor station o (xi) Dana Point compressor station	The CEC thanks SoCalGas for their clarifying comment. The CEC removed those two locations from the Express Terms as part of the revision to the proposed regulations.
6.2	**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	SoCalGas prepared a monthly forecast from 2025-2040 under average temperature and base hydro conditions. https://www.socalgas.com/sites/default/files/2024-08/2024-CGR-Workpapers-SoCalGas.pdf. Gas system operational information for an average demand day can support analyses such as evaluating intra-day storage injection patterns and management of pipeline inventory. These

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	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.	analyses can help the CEC better understand the role of various components of the gas transmission systems during the gas transition. As the gas system transitions to lower carbon fuels or portions of it get decommissioned or derated due to less demand from electrification, current average demand days can provide further insight on what peak demand will look like in the future. The ISOR provides more information about CEC gas system analysis. Additionally, the CEC received hydraulic models from PG&E that simulate average demand conditions.
6.3	**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	The CEC appreciates SoCalGas comments and remains committed to using established tools to perform its analytical and forecasting work. But, as energy sources and technology changes, the CEC must adapt and modernize tools to now account for that changing energy economy. This necessitates the CEC to update its data needs and requirements to look at more detailed interactions to properly vet and understand the energy systems to perform our planning work.

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	to continued engagement with the CEC to support state policies that promote affordability, reliability, and a balanced approach to California's energy future.	The 2024 Joint Agency Staff Paper: Progress Towards a Gas Transition identifies the following as an ongoing effort: "CEC initiatives to build upon forecasting capabilities for gas system planning and assessments, complementing and independently validating modeling conducted by the gas utilities and informing interagency gas planning." These data collection regulations are part of those efforts.
7.1	The Coalition for Renewable Natural Gas (RNG Coalition) is a California-based nonprofit organization representing and providing public policy advocacy and education for the Renewable Natural Gas (RNG) industry.1 RNG Coalition respectfully submits these comments to the California Energy Commission (CEC) in response to the *Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection in the California Code of Regulations* (Draft Rule). We support robust reporting and data collection for RNG activities in California. The Draft Rule is a good first step to develop a CEC data collection framework that demonstrates and tracks RNG's unique contribution to California's clean energy goals. The CEC has long recognized the importance of RNG as a key decarbonization strategy—both to promote methane reduction from organic waste streams and as a source of green molecules to displace conventional fuels. Accurate data collection will be critical as the role of RNG increases in California's gas system.	The CEC appreciates the RNG Coalition's collaborative comments and support. The CEC looks forward to continual partnership to secure California's energy system's future.

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7.2	**Reporting Threshold is Relatively High** Depending on what the CEC wishes to accomplish with the RNG plant dataset, the reporting threshold of at least one billion British Thermal Units of annual production capacity may be relatively high (e.g., capture only the largest RNG projects). As a point of comparison, we recommend CEC staff review the capacity ratings of existing projects as captured in the Renewable Natural Gas Database developed by researchers at Argonne National Labs.	In developing the regulations, staff consulted the Renewable Natural Gas Database and found that under outputs, all of the California facilities exceeded 1 billion BTUs per year. CEC analytical needs are met by gathering point specific information on the larger producers which constitute the majority of the RNG production in California. The 1 billion British Thermal Unit threshold was set under the desire to minimize the burden to smaller RNG projects.
7.3	**The Relationship Between Waste Feedstock Input and Gas Generation is Not Always Straightforward** Anaerobic Digestion (AD) is a complex biological process, the feedstocks input into AD units are not homogeneous, and operating conditions can significantly impact gas yield per unit mass of feedstock. Therefore, reporting the "amount of feedstock used to produce the RNG" as required in §1384.5(b)(3) may not be easy to determine, in a consistent way, across all reporting parties without more specificity. We recommend additional work be done to determine appropriate measurements for each RNG feedstock category, perhaps with an initial focus on monthly "intake of waste" for landfill and food waste projects and "manure processed" for agricultural projects. We also recommend specifying appropriate units for these reporting items and being mindful of how moisture content and total volatile solids in feedstock impact biomethane generation potential. A potentially useful point of comparison is the reporting	The CEC appreciates the feedback and made the following amendment to the Express Terms by adding the following to Section 1384.5(b)(3) *(A) for products that are comingled prior to the producer receiving the feedstock, producers should provide a ratio estimate of those comingled products.*

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	requirements for RNG production under the federal Renewable Fuel Standard.	
7.4	**The Draft Rule Should Better Clarify how to Demonstrate Reported End Uses for RNG** With respect to reporting the categories of end uses that RNG is "distributed to" as required in §1384.5(b)(4) of the Draft Rule, we recommend the rule language be improved to eliminate overlap between categories. For example, almost all RNG produced today is pipeline injected and comingled with fossil gas (and therefore moves through "gas utility systems") prior to sinking with a unique specified end user (the party who claims the environmental benefits of the gas). Once comingled with fossil gas, RNG becomes a physically interchangeable commodity. Therefore, RNG producers often will not know the final flow of their physical gas, (just as it is extremely challenging to trace an individual unit of fossil gas from one gas well to any specific end user once it has been comingled in the gas system). Further, the Draft Rule should address how to report when RNG is sold by a reporting party to an intermediary—such as wholesalers, aggregators, or dealers—rather than directly to final users. In RNG markets, and in markets for other fuels, intermediaries help enable price discovery, provide liquidity, and facilitate efficient distribution of RNG	The CEC appreciates RNG Coalition comments and thoughts on this rulemaking. At this time, the CEC isn't requiring specificity in composition of the RNG product that is produced. The proposed regulations only ask for the total amount of RNG being produced and the distribution of that RNG sent to different hand off locations. Thus, any comingling of product is not an issue. The CEC can make this item clearer though as it believes the misunderstanding on this issue involves the level of tracking being required. The CEC is only requiring reporters to report on product while in its control, not to report on contractual arrangements nor tracking of particles. To address this, the CEC amended the Express Terms to include the following underlined language: *"(4) The amount of RNG in thousand cubic feet distributed to the following <u>(the point of distribution is determined at the point the reporting entity no longer has physical control of the RNG)</u>:"*

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	between small volume producers and small volume buyers. As discussed in the next section, an electronic registry can be an important tool to help government transparently track the complexity of RNG ownership chains.	
7.5	**CEC Should Allow Voluntary Electronic Registry Use to Improve the Rigor of RNG Tracking** In addition to the proposed regulatory requirements, we request that CEC support voluntary adoption of additional “off-the-shelf” tools to track contractual relationships between RNG buyers and sellers to establish the end use of RNG. The use of electronic registries simplifies the tracking of market-based claims relative to review of a large volume of bilateral contracts. As the number of renewable natural gas facilities in California continues to grow, the CEC should support the development of electronic registries that can be used to track RNG ownership from buyer to seller across North America. For example, the Clean Counts system is a leading registry for tracking both renewable power (renewable energy credits or RECs) and RNG (renewable thermal credits or RTCs) for voluntary buyers in North America. Clean Counts currently facilitates the tracking of environmental attributes for renewable power in California’s Renewable Portfolio Standard, although that may be subject to change. Given the CEC’s history with determining eligibility and appropriate tracking for renewable power projects, the CEC is uniquely suited to understand	The CEC is committed to working with industry to minimize the reporting burden on reporting entities. If the mentioned report meets the requirements of the regulation, then the CEC can accommodate this request.

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	how these same conceptual issues could be applied for RNG. We recommend that the CEC work with the California Air Resources Board and the California Public Utilities Commission to support the harmonized use of an electronic registry for RNG.	

15-day Comments Received:
February 9, 2026, through February 25, 2026

Commenter Name/Organization	Comment Type	Assigned Number	Comment Numbers
Katharine Larson & Marissa O'Connor / Sacramento Municipal Utility District	Individual written comment	8	8.1-8.3

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8.1	**RE: Sacramento Municipal Utility District's Comments on Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection Rulemaking** The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the California Energy Commission's (CEC)'s "Energy Data Collection – Phase 3 for Natural Gas and	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments. Comments made by SMUD in their comment letter were not relevant to the 15-day comment period subject material.

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	Renewable Natural Gas Data Collection" rulemaking. SMUD is a local publicly owned electric utility serving approximately 673,000 customer meters, or a population of about 1.5 million, in Sacramento County and small adjoining portions of Yolo and Placer Counties. SMUD has established an ambitious goal of removing all greenhouse gas (GHG) emissions in its power supply by 2030, working within the guardrails of ensuring reliable and affordable electric service. As a local publicly owned electric utility that does not provide gas service to customers, SMUD had not anticipated filing comments on a natural gas and renewable natural gas data collection rulemaking. However, SMUD recently learned that the proposed amendments include revisions to electricity demand and billing data reporting for utilities with an annual peak demand exceeding 1,000 MW.1 Because SMUD has an annual peak demand exceeding 1,000 MW, SMUD would be directly affected by these changes. SMUD therefore offers the CEC the following feedback and respectfully requests the CEC consider all of its comments before finalizing the proposed regulations.	
8.2	**CEC should clarify proposed additions to electricity demand and billing data reporting** The CEC's proposed amendments to section 1353 include multiple revisions that	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments. Comments made by SMUD in their comment letter were not relevant to the 15-day comment period subject material.

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	will change SMUD's existing reporting and that will require new development, technical SMUD Comments on Proposed 2 February 25, 2026 Gas Data Collection Rulemaking LEG 2026-0026resources, coordination with CEC staff, and quality control testing for SMUD to implement. These changes include: • Increased reporting frequency (sections 1353 (a)(1) and (b)).2 • Addition of meter-level latitude and longitude data (section 1353 (b)(1)(A)). • Addition of customer identification numbers (section 1353 (b)(1)(F)) and customer groups (section 1353 (b)(1)(G)(v)). • Addition of baseline territory for service accounts being billed (section 1353 (b)(G)(ii)). • Addition of MIDAS rate identification numbers (RINs) (section 1353 (b)(1)(G)(iii)). Some of these changes may seem straightforward. However, the reporting structure for electricity demand data is complex. Information technology (IT) teams must build programs that query and group specific data elements across multiple, vast, complex systems without interfering with the performance of these systems. Unclear definitions and requirements risk misalignment between reporting utilities and the CEC, which can and does result in delayed reporting and significant costs. It is therefore critical to have a clear and precise	

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	understanding of each new data element *and* how it relates to all existing data elements. Accordingly, SMUD requests clarification regarding several proposed additions to reporting, including, “customer identification number,” “customer group,” and “baseline territory.” These terms are currently undefined in the proposed amendments and may be interpreted differently by the CEC and utilities. SMUD additionally requests that the CEC clearly describe or illustrate the required data relationships for all reporting additions.	
8.3	**CEC should further clarify the expected costs and benefits of the changes to electricity demand and billing data reporting** Changes to the electricity demand and billing data reporting requirements in section 1353 are not simple or straightforward to implement. At SMUD, each change—even to the reporting cadence—requires IT development and testing resources. SMUD therefore recommends the CEC revisit the Fiscal Impact Statement in the Initial Statement of Reasons (ISOR), which indicates that local governments will not be impacted by the proposed amendments. For example, for SMUD—a publicly owned electric utility—the addition of meter latitude and longitude data will require integration	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments. Comments made by SMUD in their comment letter were not relevant to the 15-day comment period subject material.

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	with SMUD's GIS system, which is currently not used in section 1353 reporting processes at all. This will be a technically complex and potentially costly exercise. Moreover, it is currently unclear to SMUD whether the additional precision of meter-level latitude and longitude data—which, in SMUD's case, generally reflect the center of the parcel where the meter is located, *not* the physical coordinates of the meter—will meaningfully improve the accuracy of the CEC's comparative data analyses relative to using the address of the meter. SMUD therefore requests the CEC provide additional details in the ISOR regarding the need for, and expected benefits of, each specific reporting change. The CEC should expand on the locational data problems it is seeking to address and the expected benefits of incorporating granular coordinates associated with the meter parcel. In addition, the ISOR does not appear to address the purpose or benefits of adding "customer group," "baseline territory," and MIDAS RINs to the reporting requirements for electricity demand and billing data. SMUD requests the CEC describe the need for and benefits of these additions.	

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8.4	**The CEC should carefully weigh the costs and benefits of the proposed changes** SMUD urges the CEC to weigh the resource burden of building these new reports—which are ultimately costs borne by utility customers—against the value of these more exhaustive data reporting requirements. SMUD's IT resources are planned and budgeted on a two-year cycle, and SMUD has limited ability to absorb unanticipated development and testing work. Moreover, SMUD is currently engaged in a multi-year process to migrate its enterprise-wide SAP platform, which has been in use for over two decades and—importantly—for which SAP will be phasing out support. This process will significantly ramp up in the coming year, and it will be an extraordinary effort and a critical, high-priority need for SMUD and its customers on the path to achieving SMUD's 2030 Zero Carbon Plan goals. As such, SMUD IT resources are focused on supporting this project. The proposed amendments to electricity demand reporting requirements could divert SMUD resources from this essential, time-sensitive work. If the expected benefits of any proposed change do not clearly justify the costs for utilities and their customers, SMUD respectfully requests that the CEC remove it before finalizing the proposed amendments.	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments. Comments made by SMUD in their comment letter were not relevant to the 15-day comment period subject material.

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	At a minimum, the CEC should defer the effective date of any approved changes to enable successful implementation, allow time for coordination between CEC staff and utilities, and mitigate impacts on affected utilities.	
8.5	**Conclusion** SMUD requests that the Commission clarify proposed changes to electricity demand reporting requirements and carefully weigh anticipated costs and benefits. If the Commission approves proposed changes, SMUD strongly recommends delaying the effective date of the changes to allow utilities to devote resources to building and updating the IT infrastructure needed to support these reports and ensure sufficient time for utility and CEC staff coordination.	The CEC appreciates the opportunity to work with industry and appreciates the feedback and comments. Comments made by SMUD in their comment letter were not relevant to the 15-day comment period subject material.