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PG&E Comments REÂ CEC Natural Gas and Renewable Natural Gas Data Regulations Workshop

Additional submitted attachment is included below.

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California Energy Commission
Docket Number 25-OIR-02
715 P Street
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RE: CEC Natural Gas and Renewable Natural Gas Data Regulations Workshop

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Natural Gas and Renewable Natural Gas Data Regulations Workshop held on October 7, 2026.

PG&E recommends that the CEC clarify its natural gas reporting requirements to better align with established industry conventions to promote accurate, consistent, and comparable data.

In summary, natural gas transactions are priced and reported by energy content—using $/MMBtu or $/Dth for prices and MMBtu or Dth for purchased volumes—rather than by physical volume in Mcf. Requiring conversion to Mcf-based measures could introduce inconsistent assumptions across time, location, and reporting entities. PG&E therefore recommends using the PG&E Citygate Platts Gas Daily midpoint for the applicable delivery or trade date, reporting prices in $/MMBtu or $/Dth and purchased volumes in MMBtu or Dth, while retaining Mcf only for distribution-level delivered volumes consistent with billing data.

PG&E's Comments on Sections 1308 (d) and 1308 (e)

The reporting requirement for Section 1308(d)(2) pertains to the price of gas delivered at the generation facility, and the CEC's current reporting template for Section 1308(d) requests the price of gas to be reported in dollars per thousand cubic feet ($/Mcf).

Reporting requirements for Sections 1308(e)(3) and 1308(e)(4) pertain to the average price paid during the (trade) day and the total natural gas volumes purchased for each day in Mcf. The CEC's current template for Section 1308(e) requests the average daily price to be reported in $/Mcf and total purchase volumes to be reported in Mcf.

It is PG&E's experience that gas transactions are not traded/reported using Mcf in pricing or volumes. Instead, natural gas is traded on exchanges and bilaterally through standardized North American Energy Standards Board (NAESB) contracts priced in dollars per million British thermal units ($/MMBtu) or, equivalently, dollars per dekatherm ($/Dth) with volumes reported in MMBtu or Dth. Gas transactions are denominated in $/MMBtu or $/Dth to measure energy content, or the heat value. When gas is

delivered to the end user after flowing through a pipeline the gas is metered in Mcf at the distribution level, which is a pure volume measurement and does not reflect energy content.

If gas prices and purchases are not reported in their established conventions, (i.e., $/MMBtu/$/Dth and MMBtu/Dth), then conversion factors will need to be applied which could vary by time and location. This could impact data consistency and integrity as different reporting entities would likely use various conversion assumptions.

Therefore, PG&E recommends the following clarifications be made to the reporting requirements to allow for industry-standard data reporting:

- For the requirement in Section 1308(d)(2) the price of deliveries should be reported in $/MMBtu or $/Dth, using the PG&E Citygate Platts Gas Daily midpoint for the day of each delivery. Distribution-level delivered volumes would remain in Mcf, consistent with billing data.

- For the requirement in Section 1308(e)(3) the average price on the trade date should be reported in $/MMBtu or $/Dth, using the PG&E Citygate Platts Gas Daily midpoint.

- For Section 1308(e)(4) the total natural gas purchased on each respective trade date should be reported in MMBtu or Dth.

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Natural Gas and Renewable Natural Gas Data Regulations Workshop and looks forward to further collaboration.

Sincerely,

Josh Harmon
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