

**DOCKETED**

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**Comments on Oct 27th Workshop (18-OIR-01)**

*Additional submitted attachment is included below.*



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November 13, 2020

Jason Orta  
California Energy Commission  
Supply Analysis Office – Natural Gas Unit  
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**Subject: SoCalGas Comments on the California Energy Commission’s Title 20 Data Collection Regulations to Support New Analytical Needs – Phase 2, Docket # 18-OIR-01**

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 to Support New Analytical Needs – Phase 2, held on October 27, 2020. Our comments specifically address the proposed daily underground gas storage project information language in Title 20 Section 1314(d).

As discussed in our previously submitted letter on the proposed regulations<sup>1</sup>, SoCalGas maintains concerns about the treatment of confidential data. The proposed regulations would require owners of underground natural gas storage facilities to submit project-specific daily withdrawal/injection volumes, which are typically considered to be non-public confidential information. If released publicly, such data would potentially place operators at an unfair business disadvantage because it provides market sensitive information regarding gas demand and use. SoCalGas requests that the CEC provide details on how it plans to protect and maintain the confidentiality of this data being requested.

SoCalGas appreciates the opportunity to comment.

Sincerely,

*/s/ Tim Carmichael*

Tim Carmichael  
Agency Relations Manager  
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<sup>1</sup> SoCalGas Comments on the California Energy Commission’s Natural Gas Storage Data Proposed Regulations, submitted May 29, 2020.