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California Energy Commission

STAFF REPORT

Forms and Instructions for Submitting Gas Demand and Rate Forecasting Information

Prepared in Support of the *2025 Integrated Energy Policy Report*

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California Energy Commission

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ABSTRACT

The California Energy Commission collects gas demand and rate forecast information from gas utilities in California and price information from interstate pipelines in support of the *2025 Integrated Energy Policy Report*. This staff report provides the forms and instructions that identify the information that filers must submit on demand forecasts:

- Prices
- Energy efficiency impacts
- Demand response impacts
- Information on the procurement of lower carbon fuels
- Information on rates and infrastructure
- Information related to the above for 2025 through 2040, and Historical Years 2022, 2023, and 2024.

Keywords: Gas demand, consumption, forecast, peak, price, heating and cooling degree days, demand response, energy, efficiency, electrification, decarbonization, revenue requirement, rate base, gas infrastructure, price, retail, end use

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EXECUTIVE SUMMARY

This report provides forms with instructions to request data from gas utilities with annual natural gas deliveries of 200 million therms or more in each of the two previous calendar years. This report also provides forms with instructions to request gas price forecasts from gas utilities with annual natural gas deliveries of 200 million therms or more in each of the two previous calendar years and interstate pipelines. The California Energy Commission (CEC) will use the information collected to prepare gas demand and rate forecasts and assessments, as part of the *2025 Integrated Energy Policy Report*.

The CEC is authorized to require California market participants to submit historical data, forecast data, and assessments. California Public Resources Code Sections 25216 and 25216.5 provide broad authority for the CEC to collect data and information "on all forms of energy supply, demand, conservation, public safety, research, and related subjects."

The California Public Resources Code Sections 25300–25323 direct the CEC to regularly assess all aspects of energy demand and supply. The CEC will include these assessments in the *2025 Integrated Energy Policy Report,* and possibly in supporting reports, to inform policy recommendations to the Governor, California State Legislature, and other state agencies. These energy policies seek to conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

General Instructions for Demand Forecast Submittals

California Public Resources Code (PRC) Section 25301 directs the CEC to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety. The CEC conducts regular assessments of all aspects of energy demand and supply that guide and support policy recommendations made to the Governor, Legislature, and other agencies in the *Integrated Energy Policy Report (IEPR)*. The CEC has authority to require electric and natural gas utilities, transportation fuel and technology suppliers, and other market participants to submit demand forecasts, resource plans, market assessments, related outlooks, individual customer historical electric or gas service usage, or both, and individual customer historical billing data, in support of these assessments. The CEC can specify the format and level of granularity needed for the analyses.

The California Code of Regulations (CCR), Title 20, Section 1314 authorizes the CEC to collect natural gas information from gas utilities that had annual natural gas deliveries of 200 million therms or more in each of the two previous calendar years. The regulations require separate filings for each of the following gas utilities: Pacific Gas and Electric (PG&E), San Diego Gas & Electric (SDG&E), and Southern California Gas (SoCalGas). Further, the California Code of Regulations (CCR), Title 20, Section 1348, requires interstate pipeline companies that deliver gas to locations in California or to the California border and gas utilities of 200 million therms or more in each of the two previous calendar years to submit a 10-year forecast of natural gas prices prices including but not limited to monthly average market prices at hubs such as Henry Hub, the Southern California Border, Malin, and citygates within California.

Definitions of terms used in these forms and instructions are found later in this report.

Questions relating to these forms and instructions should be directed to Jason Orta, Fuels Analysis Branch, by email at NGU@energy.ca.gov.

Who Must File

The following entities must file:

- Gas utilities with annual natural gas deliveries of 200 million therms or more in the two previous calendar years.
- Interstate pipeline companies that deliver gas to locations in California or to the California border(Form 3.1 only) and gas utilities with annual natural gas deliveries of 200 million therms or more in the two previous calendar years are required to submit a 10 year forecast of energy prices.

Summary of Requested Data

Gas utilities with annual natural gas deliveries of 200 million therms or more in each of the two previous calendar years shall submit:

- A description and map of the gas utility service area and, if different, the area for which the gas utility forecasts demand.
- A presentation of the demographic and economic assumptions that underlie the forecast, including assumptions about geographic changes in the service area or movement of customers to or from other utilities.
- Forecasted demand for each year of the forecast, accounting for conservation reasonably expected to occur, beginning with the year in which the forecast is submitted. Conservation includes steps taken to lessen the use of energy than would otherwise be the case. Conservation steps may include installing equipment (such as a computer to ensure efficient energy use), modifying equipment (such as making a boiler more efficient), adding insulation, changing behavior patterns, and so forth, that result in reduced energy consumption. For this submittal, please include:
    - Annual and monthly energy demand and annual peak demand, and the annual energy forecast and peak forecast presented by major customer sector. (Please see the "Definition" section below for more information on customer sectors).
    - Plausibility, sensitivity, and alternative economic scenario analyses.
    - Estimation of the additional cost-effective conservation potential and the effect of possible methods to achieve this potential.
    - A description of each conservation activity carried out by the utility and those proposed for future implementation.
- Additional information and analysis consistent with these regulations as required in the forms and instructions.
- A 10-year forecast of energy prices.
- A description of financial variables and assumptions used to derive the natural gas price forecasts.

Interstate pipeline companies and gas utilities with annual natural gas deliveries of 200 million therms or more in the two previous calendar years shall submit:

- A 10-year forecast of energy prices.
- A description of financial variables and assumptions used to derive the natural gas price forecasts.

Changes from the *2023 Integrated Energy Policy Report*

Changes to the *2025 Forms and Instructions for Gas Demand and Rate Information* include:

- Changes to the format of the data requests for renewable natural gas (RNG) and hydrogen (H_2). While the 2023 forms requested information on RNG and H_2 blending, the 2025 forms request information on RNG and H_2 sendouts for both delivery on the pipeline and use as transportation fuel.
- A request for the quantities of RNG and H_2 procured by facilities in California that are interconnected to the gas utility system.
- Requirements for pipeline companies that deliver gas to locations in California or to the California border and gas utilities with annual natural gas deliveries of 200 million therms or more in the two previous calendar years to submit a 10-year forecast of energy prices along with a description of financial variables and assumptions used to derive the natural gas price forecasts.
- Minor and conforming changes such as updating years requested on the forms.

Due Dates

The forms must be submitted on or before **Friday, May 23, 2025**.

Filers that require additional time may request an extension by submitting a written request to the executive director of the CEC, as described in CCR, Title 20, Article 2, Section 1342.

Submittal Format Requirements

For all filings, parties are required to use the CEC's e-filing system. Gas utilities and interstate pipeline companies must submit their demand data and narratives electronically by uploading files using an internet connection and a modern browser. A user's guide to the CEC's e-filing system is posted at http://www.energy.ca.gov/e-filing/.

After completing registration, log in and select "25-IEPR-03" from the drop-down menu.

When naming an attached file of 50 megabytes or less, please include the filer's name in the filename. Attachments should be submitted and clearly identified as separate files. Cover letters that identify documents that are part of the filing are unnecessary.

If requesting confidentiality for any part of the submittal, please read and follow the instructions in *A: Confidentiality Applications*. For confidentiality applications that require document signatures, the words "Original signed by" and the signee's typed name can serve in lieu of a wet signature. **Yellow fill should be used to highlight all cells for which confidentiality is being requested.** CEC staff uses color coding to track these requests and to protect data determined to be confidential.

Electronic information files are required for:

- Data on specified forms using Microsoft Excel®.
- Reports, narratives, and cover letters in Microsoft Word® or Adobe Acrobat®.

A template with data forms will be available on the CEC website or by request. While it is preferred that filers use this template, participants may provide these results in their own format if they provide and clearly label the equivalent information.

Protocols for Submitted Demand Forecasts

The format for collecting this information will be three forms (along with supporting data) that will support the CEC's efforts to generate the demand and rate forecasts. More information on the supporting data requested will be listed later in this document.

Specific Instructions

The CEC is requesting data from gas utilities with annual natural gas deliveries of 200 million therms or more in each of the two previous calendar years. (Forms 1,2, and 3.1).

Several forms request data by customer class. The customer classes requested on these forms are found in the "Definitions" section later in this report.

Interstate pipeline companies are required to submit a 10-year forecast of energy prices. (See Form 3.1)

Form 1 Utilities Natural Gas Demand Forecasts

Form 1 covers the utilities' natural gas demand forecasts. If the form requests data that the gas utility does not have, please specify this on the form. If the form requests data that are not applicable to the utility, please write "not applicable."

Form 1.1 Average Year Natural Gas Demand by Customer Class and Month

This form seeks each utility's forecast of average year natural gas demand by customer class and month for 2025 through 2040.

Form 1.2 Cold Year[1] and Dry Hydro[2] Demand by Customer Class and Month

This form seeks each utility's cold year and dry hydroelectric natural gas demand by customer class and month for 2025 through 2040.

Form 1.3 Hot Year Natural Gas Demand by Customer Class and Month

This form seeks each utility's hot year natural gas demand by customer class and month for 2025 through 2040.

Form 1.4 Daily Recorded and Weather-Normalized Natural Gas Demand by Customer Class and Day

This form seeks each utility's daily recorded and weather-normalized natural gas demand by customer class and month for the last two calendar years available.

[1] The *2024 California Gas Report* defines a cold temperature year as "cold design-temperature conditions based on long-term recorded weather data."

[2] Dry hydro conditions are years in which hydroelectric generation is lower than historical averages.

Form 1.5 Peak Day Demands

This form seeks each utility's peak day forecast for the following scenarios: Extreme Peak Day/Abnormal Peak Day, Winter Peak Day Demand, Summer Peak Day Demand, and Monthly Peak Day Demand.

Form 1.6 Natural Gas Commodity Price, Electricity Price, Average Natural Gas Transportation Rate by Customer Class, and Price of Renewable, Synthetic, or Hydrogen Used to Prepare the Forecasts in Form 1.1, Form 1.2, and Form 1.3

This form seeks the monthly natural gas commodity price in dollars per million cubic feet assumed as an input to the demand forecast, the monthly electricity price in cents per kilowatt-hour (kWh), if any, and the average monthly natural gas transportation rate charged to each customer class in dollars per million cubic feet in developing the utility's natural gas demand forecast. This form also seeks the monthly price for any renewable gas, synthetic gas, or hydrogen that may be blended into the commodity price used as an input to the demand forecast and to identify what portion of the overall commodity price is composed by these fuels.

Form 1.7 Heating and Cooling Degree Days by Month and Year and Temperature Zone Identification

This form requests the assumed heating[3] and cooling degree days[4] by month and year used to derive the forecast and a description of how they were determined. This information includes historical heating and cooling days for the two most recent years available. The form also requests degree days for average year, cold year and dry hydro, and hot year scenarios. This form also requests the forecasted heating and cooling degree days accounting for climate change. Form 1.7 also seeks the names of the temperature zones used to derive the forecast, the names of the weather stations that define each zone, and the weight accorded each weather zone in developing any of the forecasts.

Form 1.8 Planning Area Macrolevel Economic and Demographic Assumptions

This form seeks the macrolevel economic and demographic assumptions behind each utility's natural gas demand forecast. Please fill in the tables on the worksheet or modify the worksheet with the inputs that the utility uses to prepare its natural gas demand forecasts. The first table includes annual gross state product for California and, if used in the demand forecast, the utility service area, as well as any estimate of inflation or deflator series if embedded in any of the costs used to develop the forecast. This form also seeks population, number of households, personal income, taxable sales or commercial floorspace (in millions of

square feet), and employment by economic sector. Employment sectors include economic and demographic assumptions.

- Agriculture
- Mining
- Construction
- Manufacturing
- Transportation, information, utilities
- Trade
    - Retail
    - Wholesale (including warehousing)
    - Restaurants
    - Finance, insurance, and real estate
    - Services
    - Accommodation
    - Personal and laundry services
    - Professional and business services
- Health and social services
- Miscellaneous services
- Government and education

Form 1.9 Base Year and Forecast of End-Use Equipment Data and Saturation by Customer Class

This form seeks base year and forecast years of end-use equipment data. The utility should provide, for each customer class, the end-use equipment and saturations assumed in the forecast.

Form 1.10 Cumulative Incremental Energy Efficiency and Demand Response by Sector

This form requests information about energy efficiency and demand response. This information can include gas utility programs, electric utility programs in the gas utility's service territory that impact future gas demand, and nonutility programs. Here the utility is to report cumulative incremental impacts of energy efficiency.

Form 1.11 Climate Change, Electrification, RNG, Hydrogen, Synthetic Gas, and Certified Low-Carbon Gas

This form seeks each gas utility's forecast of demand reduction or increase due to a) climate change, b) electrification, or c) introduction of renewable gas, hydrogen, or synthetic gas. It also asks for the quantity of alternatives that the utility forecasts it or others will send out into the gas system and the quantity of certified low carbon gas procured by the utility. This form

asks for the quantity of RNG and hydrogen sent out on the pipeline and for transportation fuel, respectively. Also requested are the quantities of RNG and hydrogen procured by facilities in California interconnected to the gas utility system. The utility should indicate each local jurisdiction it knows has or is expected to adopt some sort of local ordinance or building code reducing natural gas use and whether the utility has taken that into account in its forecast.

Form 1.12 New Business

Form 1.12 asks how much of the forecast represents new business and the additional miles of new pipe needed to serve new business. The utility should indicate the number of net additional million cubic feet per day in the demand forecast for each customer class that represents new business.

Form 2 Natural Gas Transportation Rates and Revenue Requirements

Form 2 pertains to natural gas transportation rates and revenue requirements.

Form 2.1 Natural Gas Revenue Requirement by Functional Asset Category and Customer Class

This form seeks the natural gas revenue requirement by functional asset category (for example, distribution, transmission, storage, customer and other) and the associated factors used to allocate costs for each functional category to customer classes. Either use the format outlined in the forms or modify the form to report the information as it is normally collected and reported by the utility.

Please break out costs for major programs separately. Examples of major programs include the Pipeline Safety Enhancement Program, the Storage Integrity Management Program, the Transmission Integrity Management Program, the Distribution Integrity Management Program, the Work for Others Program, and the New Business Program. Please break out capital expenditures by functional asset category. Break out operation and maintenance (O&M) expenses by functional cost category. Please identify the following O&M expenses:

- Administrative and general costs
- Uncollectibles
- Franchise fees
- Depreciation
- Income taxes
- The net-to-gross multiplier
- Overall rate of return

Use additional lines to identify O&M cost associated with procurement, customer service, information technology, engineering, support services or other. This form also seeks resulting allocation of costs for each asset category to the following customer classes:

- Residential
- Core commercial
- Core Industrial
- Noncore Commercial
- Noncore non-Electric Generation (EG)
- Electric Generation
- Wholesale
- Enhanced Oil Recovery (EOR)
- Other

Form 2.2 Customer Count Information

This form seeks the count of customers by class and the number of customers on California Alternative Rates for Energy (CARE)[5] rates.

Form 2.3 Total Dollars of Rate Base by Functional Category Split into Depreciated and Undepreciated Asset Value

This form seeks total dollars of rate base for each functional category, split into depreciated versus undepreciated asset value.

Form 2.4 Expected Replacement and Retirement of Gas Infrastructure

This form seeks number of regulators, expected replacement miles from 2025 to 2040, expected number of regulator retirements, expected number of pipeline retirements, and number of miles at high risk of failure or incident.

Additional Forecast Detail

Gas utilities are to provide:

- **Detailed forecast workpapers**

  The workpapers that accompany the forecasts.
- **Description and map of gas utility service area**

  A description and map of the gas utility service area and, if different, the area for which the gas utility forecasts demand. Please identify if this includes small gas providers within the utility service territory.
- **Temperature data used to identify extreme peak day**

  Historical data set used to identify the temperature for the extreme peak day.
- **Temperature basis for heating degree and cooling degree days**

The gas utility's temperature basis for heating degree and cooling degree days.

- **Underlying demographic and economic assumptions**

  The underlying demographic and economic assumptions for the forecast, including assumptions about geographic changes in the service area or movement of customers to or from other utilities. Please provide information on plausibility, sensitivity, and alternative economic scenario analyses.

- **Description of energy efficiency impacts**

  A description of how the forecasts account for energy efficiency, additional achievable energy efficiency, and so forth. Estimation of the additional cost-effective conservation potential and the effect of possible methods to achieve this potential, and a description of each conservation activity carried out by the gas utility and those proposed for future implementation.

- **Gas distribution and transmission system annual reports**

  Most recent report submitted under CPUC General Order 112-F Section 123.

  CPUC General Order 112-F requires pipeline operators to submit annual reports to the CPUC as required by Title 49, Code of Federal Regulations, Part 191.11 and 191.17.

  These annual reports include information such as:

  - Volume transported.
  - Miles of pipe.
  - Integrity inspections conducted.
  - Failures, leaks, and repairs.
  - Excavation damage.

Gas utilities and interstate pipeline companies are to provide the following:

- **Description of financial variables and assumptions used to derive the natural gas price forecasts.**

Form 3.1 Price Forecasts

Form 3.1 requests ten-year gas price forecasts from utilities and interstate pipeline companies at the following points in $/therm:

- Henry Hub
- Southern California border
- Malin
- PG&E Citygate
- SoCal Citygate
- Other hubs (please identify the name(s) if applicable)

For gas utilities, please provide the price forecasts that are used to generate demand forecasts.

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Original Term
2025 IEPR	*2025 Integrated Energy Policy Report*
APD	Abnormal Peak Day
CARE	California Alternative Rates for Energy
CCR	California Code of Regulations
CGR	California Gas Report
CDD	Cooling Degree Day
CPUC	California Public Utilities Commission
Energy Commission	California Energy Commission
EG	Electric Generation
EOR	Enhanced oil Recovery
F	Fahrenheit
H2	Hydrogen
HDD	Heating Degree Day
IEPR	Integrated Energy Policy Report
IOU	Investor-Owned utility
kWh	Kilowatt-hour
LDC	Local Electric or Natural Gas Distribution Company
MMcfd	Million Cubic Feet Per Day
NG	Natural Gas
PG&E	Pacific Gas and Electric Company
PRC	California Public Resources Code
RNG	Renewable Natural Gas
SDG&E	San Diego Gas and Electric Company
SMUD	Sacramento Municipal Utility District
SoCalGas	Southern California Gas Company

DEFINITIONS

Average Day: Annual gas sales or requirements assuming average temperature year conditions divided by 365 days.

Average Year: Temperature and hydro conditions expected to occur 1-in-2 years. One in two is considered an average year because one year out of two is half of all years.

California Alternatives Rates for Energy (CARE): A program that offers discounts on electricity and gas bills based on income eligibility and household size. CARE is funded by other electricity and gas ratepayers.

Cogeneration: Simultaneous production of electricity and thermal energy from the same fuel source.

Cold Temperature Year: Cold design-temperature conditions based on long-term recorded weather data.

Commodity Price: The price of natural gas in dollars per million British thermal units that is purchased by a utility and passed through to customers on their monthly bill.

Company Use: Gas used by utilities for operational purposes, such as fuel for line compression and injection into storage.

Cooling Degree Days (CDD): The number of degrees by which a daily average temperature exceeds a base temperature and may therefore require additional energy for space cooling. The base temperature is typically 65°F, although different utilities and planning entities sometimes use different base temperatures. The base temperature loosely represents an average daily temperature below which space cooling (e.g. air conditioning) is not needed. The average temperature is the average of the minimum and maximum daily temperatures. CDDs can be summed over the entire year or over a portion of the year (e.g. the month of July) as a rough indicator of cooling energy used over that period.

Core Customer (PG&E): A natural gas customer that consumes less than 20,800 therms of natural gas per month.

Core Customers (SoCalGas and SDG&E): All residential customers and all commercial and industrial customers with average usage less than 20,800 therms per month who cannot fuel switch. Also, those commercial and industrial customers (whose average usage is more than 20,800 therms per year) who elect to remain a core customer receiving bundled gas service from the local distribution company (LDC).

Cost Allocator: The factor used by the gas utility to allocate costs by category among customer classes.

Customer: An active billed account, of a utility distribution company (UDC), an LSE, or a gas utility.

Customer Classes: Customer classes used by the CEC are defined using the following categories.

Table 1: Customer Class and Definitions

Customer Class	Definitions
Residential	A category of gas customers whose dwellings are single-family units, multi-family units, mobile homes, or other similar living facilities.
Commercial (SoCalGas and SDG&E)	Category of gas customers whose establishments consist of services, manufacturing nondurable goods, dwellings not classified as residential, and farming (agricultural).
Commercial (PG&E)	Non-residential gas customers not engaged in electricity generation (EG), enhanced oil recovery (EOR), or gas resale activities with usage less than 20,800 therms per month industrial: customers consuming gas for industrial purposes.
Industrial (PG&E)	Non-residential customers not engaged in EG, EOR, or gas resale activities using more than 20,800 therms per month.
Industrial (SoCalGas and SDG&E)	Category of gas customers who are engaged in mining and in manufacturing.
Electric Generation	Customers consuming natural gas to generate electricity (including cogeneration) by a utility, customer, or independent power producer.
Wholesale	A category of customer, either a utility or municipal entity, that resells gas.
Enhanced Oil Recovery (EOR)	Injection of steam into oil-holding geologic zones to increase ability to extract oil by lowering its viscosity. Also used to designate a special category of gas customers.
Other	Customers consuming gas for other purposes.

Shrinkage	Gas used by the utility to operate its system or that it is unaccounted for.

Source: California Energy Commission

Customer Count: The number of customers served in each customer class (should match the customer count used for setting rates).

Customer Sectors: Customer sectors used by the CEC are defined using the following NAICS categories.

Table 2: Economic Sector Definitions and NAICS Codes

Economic Sector	NAICS Codes
Residential: Private households, including single- and multifamily dwellings and mobile homes.	RE00-RE39, 001-003, and 814
Commercial	115, 326212, 42, 44-45, 493, 512, 514, 518-519, 52-55 (excluding 5324), 561, 61, 62, 71, 72, 81 (excluding 814), 92 (excluding 9225, 9226, and 92811)
Industrial	11331, 21 (excluding 211-213), 31, 32 (excluding 3262120, 33, and 511
Mining/Resource Extraction/Construction	211-213, 23
Agricultural and Water Pumping	111, 112, and 22131
Transportation, Communication, Utility (TCU)	221 (excluding 22131), 48, 49 (excluding 493), 513, 517, 5324, 562, and 92811
Street Lighting/Traffic Signals	922198, 922199, 9225, 9226, 925130, 925140, and 925190

Source: California Energy Commission

Demand: The rate at which natural gas, measured as million cubic feet per day, is consumed by the customer.

Electric Generator: A machine that converts mechanical energy into electrical energy; or a device that converts non-mechanical energy to electricity directly, including without limitation photovoltaic solar cells and fuel cells.

Electrification: Demand that is decreased because it switches to electricity.

End User: Any company that consumes electricity or natural gas for its own use and not for resale.

Exchange: Delivery of gas by one party to another and the delivery of an equivalent quantity by the second party to the first. Such transactions usually involve different points of delivery and may or may not be current.

Executive Director: The executive director of the CEC or a designee.

Functional Asset Category: The typical asset categories as defined by function; that is Transmission, Storage, Distribution, Customer, and Other used for cost allocation and rate making.

Gas Deliveries: The volume of gas delivered to customers in million cubic feet per day, or where applicable, per hour.

Gas Retailer: Any company that a) sells natural gas to end users or customers located in California, b) produces and consumes natural gas on-site in California (except for gas consumed for gathering, processing, or compressing purposes), or c) produces natural gas at one site and consumes natural gas at another site that is in California and that is owned or controlled by the company.

Gas Service Area: The geographic area where a gas utility distributes, or has distributed during an applicable reporting period, natural gas to customers.

Gas Sendout: That portion of the available gas supply that is delivered to gas customers consumption, plus shrinkage.

Gas Utility: Any company that is a) engaged in, or authorized to engage in, distributing or transporting natural gas or natural gas liquids, and that is b) either owned or operated by a governmental public entity or regulated by the CPUC.

Heating Degree Day (HDD): An HDD is accumulated for every degree Fahrenheit (F) the daily average temperature is below a standard reference temperature (SoCalGas and SDG&E: 65 degrees F; PG&E 60 degrees F). A basis for computing how much electricity and gas are needed for space heating purposes. For example, for a 50-degree F average temperature day, SoCalGas and SDG&E would accumulate 15 HDD, and PG&E would accumulate 10 HDD."

Hourly Load Profile: Demand broken down by hour.

Injections: The volume of gas injected into the underground gas storage project each day.

Interstate Pipeline: Any pipeline that crosses a state border and that is under the regulatory authority of the Federal Energy Regulatory Commission or its successors.

Interstate Pipeline Company: A company that owns or operates an interstate pipeline that delivers natural gas to California at the state's border or inside California's borders.

Monthly System Peak Demand: The highest system hourly demand in a calendar month.

Natural Gas Liquids: Liquid products that are produced at natural gas processing facilities and that are gaseous at reservoir temperatures and pressures but are recoverable by condensation or absorption.

Natural Gas Prices: Prices at Henry Hub, hubs within California and hubs at points that border California.

Natural Gas Sales: The amount of natural gas sold by a Gas Retailer to a customer.

Noncore Customer: Commercial and industrial customers whose average exceeds 20,800 therms per month, including qualifying cogeneration and solar electric projects. Noncore customers assume gas procurement responsibilities and receive gas transportation service from the utility under firm or interruptible intrastate transmission arrangements.

North American Industry Classification System (NAICS): The system of classification for business establishments set forth in the most recent version of the North American Industry Classification System United States Manual (Executive Office of the President, Office of Management and Budget, Washington, D.C.), and as revised thereafter in the Federal Register.

NAICS Code: The applicable six-digit (unless otherwise specified) code in the NAICS for the entity being classified.

Peak Demand: The highest integrated net energy for load within a period (a month, a season, or a year).

Person: A human being.

Power Plant: A plant located in California or a California control area that contains one or more prime movers, one or more electric generators, and appropriate auxiliary equipment.

Rate Schedule: The alphanumeric designation for the utility service customer agreement including all service rates and charges and all classifications, practices, rules, or regulations that in any manner affect or relate to the utility services, rates, and charges.

Renewable Natural Gas: Biogas that has been upgraded for use in place of fossil natural gas (also known as RNG). The biogas used to produce RNG comes from a variety of sources, including municipal solid waste landfills and anaerobic digester plants at water resource recovery facilities (wastewater treatment plants), livestock farms, food production facilities and organic waste management operations.

Service Account Number: The unique identification number assigned by a utility to an account to track demand and provide billing services.

Shrinkage: Gas used by the utility to operate its system or that is unaccounted for.

Stocks: Quantities of oil, natural gas, or natural gas liquids representing measured inventories corrected to 60 degrees Fahrenheit less basic sediment and water where an actual physical measurement is possible. Stocks include domestic and foreign quantities held at a facility and in transit thereto, except those in transit by a pipeline.

Submitted: Regarding data, a report, or an application that must be submitted by a specified date, that the CEC receives the data by that date and that the data, report, or application is complete, accurate, and in compliance with the applicable requirements of this article and with the forms and instructions specified under section 1303 and 1342.

Therm: A unit of heat equal to 100,000 British thermal units (1.054 x 108 joules).

Tolling Agreement: A contractual arrangement whereby the buyer of electricity agrees to provide specified amounts of natural gas to a power plant for conversion to specified amounts of electric energy over a specified period.

Underground Gas Storage Project: A project for the injection and withdrawal of natural gas into an underground reservoir for the purpose of storage. An underground gas storage project includes the reservoir used for storage, the confining strata, gas storage wells, observation wells, and any other wells approved for use in the project. An underground gas storage project also includes the wellheads and, to the extent that they are subject to regulation by the Division of Geologic Energy Management, attendant facilities, and other appurtenances.

Useful Thermal Output: The thermal energy made available in a cogeneration system for use in any industrial or commercial process, heating or cooling application, or delivered to other end users, such as, total thermal energy made available for processes and applications other than electrical generation.

Waste Heat: The thermal energy produced during electrical generation but not utilized for a useful purpose as defined in “useful thermal output,” such as, the total heat content of the fuel used to generate electricity minus the energy content of the useful thermal output and electricity production.

Withdrawals: The volume of gas withdrawn from the underground gas storage project each day.

Working Gas: The volume of daily natural gas in an underground gas storage project available to be withdrawn, not including base gas.

Working Gas Capacity: The total storage capacity of the underground gas storage project minus base gas.

APPENDIX A:
Confidentiality Applications

Repeated Applications for Confidentiality

Information submitted to the California Energy Commission can be deemed confidential without the need for a new application under CCR, Title 20, sections 2505(a)(1)(G) and 2505(a)(4) if you file a certification under penalty of perjury that the new information is substantiality similar to the previously granted confidentiality.

In this case, your current application will serve as your certification, and the designation of confidentiality will be under the same terms as the prior designation. The information will remain confidential under the same terms as the prior designation for the same or comparable period identified by the applicant in the application. When submitting substantially similar information, you may take advantage of the repeated application process by providing a certification along with the data.

How to Request Confidentiality

An application for confidential designation can be downloaded at https://www.energy.ca.gov/sites/default/files/2023-04/CEC_13_Application%20for%20Confidential_04-24-2023.pdf.

The executive director of the CEC is responsible for determining what information submitted with an application for confidentiality will be deemed confidential. Parties who seek such a designation for data they submit must make a separate, written request that identifies the specific information and provides a discussion of why the information should be protected from release, the length of time such protection is sought, and whether the information can be released in aggregated form.

Certain categories of data provided to the CEC, when submitted with a request for confidentiality, will be automatically designated as confidential and do not require an application. The types of data that are eligible and the process for obtaining this confidential designation are specified in CCR, Title 20, Section 2505(a)(5). The CEC has its own regulations distinct from those governing the CPUC, and CPUC determinations on confidentiality are not applicable to data submitted to the Energy Commission.

Parties should be aware that some confidential data may be disclosed after aggregation according to CCR, Title 20, section 2507(d) or (e).

What a New or Repeated Confidentiality Application Must Have

Applications for confidentiality and confidential documents must be uploaded directly to Dockets through the e-filing system. A user's guide to the CEC's e-filing system is posted at http://www.energy.ca.gov/e-filing/. Paper copies or compact discs do not need to be submitted. Links to the e-filing system are provided on each proceeding's web page under the

link "**Submit e-filing.**" Registration is necessary the first time documents are uploaded. Once registration is complete, to submit a confidential filing click **Quick Actions** on the **DASHBOARD** and select **Submit Confidential e-filing** from the dropdown menu. The application needs to be uploaded first, followed by the confidential materials. The application will then be acted upon by the executive director in consultation with the chief counsel of the CEC. (Section 2505, subd. (a).)

- The following statement must be included, "I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to make the application and certification on behalf of (ABC Utility or Corporation)."
- For electronic filings containing a signature, including for submissions into electronic databases requiring a signature as attestation of information, the signature may be in electronic form and represented as a scanned signature graphic, or "Original Signed By," "/S/," or similar notation followed by a typewritten name.

What a New or Repeated Confidentiality Application Must Include

A complete application for confidentiality contains the following information:

- Identification of the information being submitted, including docket number, title, date, and size (for example, pages, sheets, megabytes).
- Description of the data or information for which confidentiality is being requested (for example, particular electricity supply contract categories for particular years).
- On Microsoft Excel® forms submitted with prospectively confidential data, identification of specific cells using yellow fills that are consistent with the confidentiality application.
- A clear description of the period for which confidentiality is being sought for each information category (for example, until December 31, 2025).
- An appropriate justification for each confidential data category request, including applicable provisions of the California Public Records Act (Government Code Section 6250 et seq.) and/or other laws.
- A statement attesting that a) the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or b) the public interest in nondisclosure of these particular facts clearly outweighs the public interest in disclosure.

What Happens If a New or Repeated Application Is Incomplete

Applications that are docketed will be reviewed by CEC staff within 30 calendar days of receipt for clarity, completeness, content, and context. If the application is incomplete or ambiguous in one or more respects, or if the data are incomplete or questionable, staff will contact the filer to resolve these uncertainties or obtain needed information.

Staff may append data and information to the supply forms as requested by the filer. Also, an updated or corrected Excel file may be forwarded by the filer as necessary. Where an

application is unclear or incomplete, a filer may submit a corrected replacement application for confidentiality. By arrangement, a corrected application may be submitted electronically to the Docket Office. Once a docketed application is considered complete, staff prepares a recommendation for determination by the executive director.

Applications deemed incomplete may not be docketed by Energy Commission staff and may result in delay in processing until the deficiency can be corrected. The filer will be notified by the Office of the Chief Counsel about deficiencies in the application. The applicant has 14 calendar days to correct defects in the application and return an amended application to the CEC.

After 14 days, all information associated with a still–incomplete application for confidentiality will be deemed publicly disclosable and will be docketed accordingly.

Determinations and Additional Information for New Applications

The executive director signs confidentiality determination letters in response to New Applications for Confidentiality. The applicant has 14 calendar days to appeal this decision.

An applicant can request confidentiality at any time, but once information is publicly released, confidentiality cannot be granted. The CEC strongly encourages filers to provide data and confidentiality requests concurrently.

More specific questions about confidentiality may be emailed to ConfidentialityApplication@energy.ca.gov.