APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CalPA-SCG-06)
Date Requested: November 07, 2025, Response Due: December 3, 2025

QUESTION 1: Please refer to page 27 of SoCalGas' Application which states,

> "To further minimize NOx emissions under normal operations, the new compression equipment will operate such that the electric compressors will be the first on and the last off. This means that, except for when the La Goleta Storage Field is on injection, the gas compressors will most likely not be in use."

a) Please compare the cost to operate:

   i. One of the proposed project's electric compressors (assuming all other compressors are offline) vs the cost to operate one of the proposed project's gas compressors (assuming all other compressors offline) for a 24-hour period (midnight-midnight) during a normal demand day, so as to compare the difference in operational costs between the two types of compressors.

   ii. A full year of operating only electric compressors vs only operating gas compressors.

   iii. The proposed project's electric compressor vs the proposed project's gas compressor delivering the same 100MMcf/d of natural gas (use approximate inlet and outlet pressures found during normal operations).

b) What percentage of the time does SoCalGas constitute "Normal Operations" when the gas compressors will most likely not be in use. During which seasons and operating conditions would the gas generators be expected to operate other than when the La Goleta Field is on injection?

c) Please provide evidence to support how SoCalGas calculated the required horsepower necessary for these standby gas generators for the periods of non-normal operations.

RESPONSE 1:

SoCalGas requested an extension to December 3, 2025, which was granted by Cal Advocates.

REVISED RESPONSE 1:

RESPONSE 1a.i:

In its Application, SoCalGas used the term "normal operations" to describe the conditions under which all compressor units are operationally available, and station power feed is available. Operations and maintenance activities such as compliance testing, planned or unplanned maintenance are considered outside "normal operations."

SoCalGas objects to the term "normal demand day" as vague and ambiguous. The term "normal demand day" is inherently broad and is not defined or constrained by any single operating condition. In

practice, a "normal demand day" encompass a wide range of scenarios from the Ventura Station supporting North Coastal system gas utilization/demand across seasonal variations to meeting system demand while La Goleta storage is actively injecting.

As stated above, since "normal demand day" encompass a wide range of scenarios, SoCalGas reviewed historical data from 2022 to establish a 24-hr period demand profile that represents an average demand day supporting the north coastal demand. The average suction and discharge pressures for the months of April through October, when the compressor station was operating, were used solely as an example to represent a "normal demand day" for this request. For comparison, the cost was calculated based on operating electric motor-driven compressor (compressor (EDC) and gas engine-driven compressor (GDC) at 1900 hp[1]. The daily cost to operate one electric compressor compared to the cost of operating one gas compressor is presented in Table 1[2] below.

The actual electrical cost for operating the EDC will vary because utility demand charges are calculated based on the peak power utilization for a billing period. However, for this response, SoCalGas utilized Southern California Edison's Rate Schedule TOU-8 summer rates to calculate the electricity usage costs for the 24-hour period. Demand charges were also based on the peak utilization demand for the 24-hour period.

For this request, a rate of $3.51/MMBTU has been assumed for natural gas costs for operating the gas GDC based on an average cost for the year 2024.

Table 1
Cost of Daily Operation, 24 hours

	Electric Compressor Only	Gas Compressor Only
Daily EDCs electric consumption (KWh)	34,004	
Daily EDCs electrical costs[a]	$5,441	
Electricity demand costs[b]	$3,041	
Daily electrical costs to operate 1 EDC[c]	$8,482	
Daily GDCs gas usage (MMBTU)		330
Daily gas costs[d] to operate 1 GDC		$1,159

Note: KWh = Kilowatt-hour and MMBTU = Million British Thermal Units

[a]Electricity usage costs (Daily EDCs electrical costs) are estimated at $0.16/KWh for this 24-hour period based on Southern California Edison's Rate Schedule TOU-8 document, Sheet 6.

[b]Electricity Demand charges (Electricity demand costs) are typically billed on a monthly basis based on peak consumption; however, for this response the demand charges were based on the peak utilization demand for the 24-hour period.

[1] For this comparison, 1900 hp was selected for electric compressor and gas compressor so that a direct cost comparison can be made.
[2] Costs provided in this response were calculated to solely account for energy (electricity and natural gas) consumed to operate the compression equipment only.

[c]Total daily electricity costs is the sum of electric usage and the demand costs (Daily EDCs electrical costs + Electricity demand costs).

[d]Natural Gas costs are estimated to be $3.51/MMBTU based on the average Citygate price for the year of 2024 (Source: U.S. Energy Information Administration – EIA - Natural Gas Citygate Price in California (Dollars per Thousand Cubic Feet))

RESPONSE 1a. ii:

A comparison of the annual operating costs of using only electric compressors versus using only gas compressors are presented in Table 2a[3] below. SoCalGas used data from the year 2022 to calculate operating costs based on La Goleta storage field inventory of 10.9 billion cubic feet (BCF).

Cost of operating the compressors will depend on La Goleta starting inventory, which varies depending on seasonal demands. Table 2b[4] below shows the cost of operating the compressors when starting inventory at La Goleta is at 0 BCF. This example uses actual suction and discharge pressures from year 2022; however, it assumes summer flowrate of 160MMscfd (April 1st to Oct 31st) until La Goleta is filled to its capacity of 21.5 BCF.

Table 2a

Cost of Annual Operation with La Goleta Inventory Levels at 10.9 BCF

	Electric Compressors Only	Gas Compressors Only
Annual EDCs electric consumption (KWh)	9,244,363	
Annual electrical usage costs[a]	$1,340,737	
Annual electricity demand costs[b]	$1,471,927	
Annual electricity costs to operate 2 EDCs[c]	$2,812,664	
Annual GDCs gas usage (MMBTU)		89,704
Annual gas costs to operate 2 GDCs[d]		$274,664

[a]Electricity usage costs are estimated at $0.16/KWh in Summer months (June through September) and $0.13/KWh for the rest of the year based on Southern California Edison's Rate Schedule TOU-8 document, Sheet 6.

[b]Demand costs are estimated based on peak horsepower usage by the EDCs on a monthly basis.

[c]Total electricity costs is the sum of electric usage and the demand costs.

[3] Costs provided in this response were calculated to solely account for energy (electricity and natural gas) consumed to operate the compression equipment only.
[4] Costs provided in this response were calculated to solely account for energy (electricity and natural gas) consumed to operate the compression equipment only.

[d]Natural Gas costs are estimated using monthly average Citygate price for the year 2024 (Source:U.S. Energy Information Administration – EIA -Natural Gas Citygate Price in California (Dollars per Thousand Cubic Feet)) Note: Natural gas prices can be variable, driven by factors such as seasonal demand, infrastructure constraints, storage levels, and weather extremes resulting in fluctuations.

Table 2b

Cost of Annual Operation with La Goleta Inventory Levels at 0 BCF and Using 2022 Operating Pressures

	Electric Compressors	Gas Compressors
Annual energy consumption	15,103,660 (KWh)	31,751 (MMBTU)
Annual electrical usage costs[a]	$2,206,293	
Annual electricity demand costs[b]	$1,893,098	
Annual electricity costs to operate the EDCs[c]	$4,099,391	
Annual gas costs[e]		$90,296
Annual energy costs to fill La Goleta from 0 BCF[d]	**$4,189,687**	

[a]Electricity usage costs are estimated at $0.16/KWh in Summer months (June through September) and $0.13/KWh for the rest of the year based on Southern California Edison's Rate Schedule TOU-8 document, Sheet 6.

[b]Demand costs are estimated based on peak horsepower usage by the EDCs on a monthly basis.

[c]Total annual electricity costs is the sum of electrical usage and the demand costs.

[d] Annual energy cost is the sum of total annual electricity cost and the annual gas cost.

[e]Natural Gas costs are estimated using monthly average Citygate price for the year 2024 (Source:U.S. Energy Information Administration – EIA - Natural Gas Citygate Price in California (Dollars per Thousand Cubic Feet))

Note: Natural gas prices can be variable, driven by factors such as seasonal demand, infrastructure constraints, storage levels, and weather extremes resulting in fluctuations.

RESPONSE 1a. iii:

SoCalGas used historical data from 2022 to estimate a 24-hr period demand profile The average suction and discharge pressures for the months of April through October, when the compressor station was operating, were used solely as an example to establish an operating basis for this request. Cost comparison for operating the proposed project's electric compressor versus the proposed project's gas compressor delivering the same 100MMcf/d of natural gas for 24-hour period (using approximate inlet and outlet pressures found during normal operations) is presented in Table 3[5] below.

Table 3
Cost of Daily Operation, 24 hours based on 100MMcf/d delivery rate

	Electric Compressors Only	Gas Compressors Only
Daily EDCs electric consumption (KWh)	50,350	
Daily EDCs electrical costs[a]	$8,056	
Electricity demand costs[b]	$4,732	
Daily electrical costs to operate the EDCs[c]	$12,788	
Daily GDCs gas usage (MMBTU)		489
Daily gas costs to operate the GDCs[d]		$1,716

Note 1: For the above analysis, SoCalGas has assumed the same operating suction and discharge pressures in a 24-hour period used to develop the response to Question 1a.i but has fixed the flow rate to 100 MMscf/d.

[a]Electricity usage costs (Daily EDCs electrical costs) are estimated at $0.16/KWh for this 24-hour period based on Southern California Edison's Rate Schedule TOU-8 document, Sheet 6.

[b]Electricity Demand charges (Electricity demand costs) are typically billed on a monthly basis based on peak consumption; however, for this response the demand charges were based on the peak utilization demand for the 24-hour period.

[c]Total electricity costs is the sum of electric usage and the demand costs (Daily EDCs electrical costs + Electricity demand costs).

[d]Natural Gas costs are estimated to be $3.51/MMBTU based on the average cost for the year of 2024 (Source: U.S. Energy Information Administration – EIA - Natural Gas Citygate Price in California (Dollars per Thousand Cubic Feet))

Note: Natural gas prices can be variable, driven by factors such as seasonal demand, infrastructure constraints, storage levels, and weather extremes resulting in fluctuations.

[5] Costs provided in this response were calculated to solely account for energy (electricity and natural gas) consumed to operate the compression equipment only.

RESPONSE 1b.

In its Application, SoCalGas used the term "normal operations" to describe the conditions under which all compressor units are operationally available, and station power feed is available. Operations and maintenance activities such as compliance testing, planned or unplanned maintenance are considered outside "normal operations".

SoCalGas objects to the term "gas generators" as vague and ambiguous. For purposes of this response, SoCalGas understands CalPA's reference to "gas generators" as intended to mean "gas compressors."

However, SoCalGas does not expect the gas compressors to be in use significantly between November 1st and March 31st (which is outside of the typical Summer La Goleta injection season from April 1st through October 31st) which is 151 days of a 365-day year (41%). In general, a decline in Ventura Compressor Station compressor utilization is expected during the Winter season (November 1st to March 31st) regardless of compressor type. The system is designed to fill storage fields during periods of low demand in the summer and withdraw the gas from the storage fields during periods of higher demand in the winter. Therefore, the compressor station is expected to see higher utilization in the summer than in the winter. Because of the lower utilization in winter, and the operating priority of using the electric compressors first, the gas compressors are not likely to be used for "normal operation" in the winter.

Typically, during withdrawal operations from La Goleta Storage Field the compressors at Ventura Compressor Station are offline but can be utilized in parallel with storage field to supply the north coastal demand. In which case the electric compressors will continue to be utilized first on last off.

Additionally, there are days during the typical Winter withdrawal season where system conditions permit SoCalGas to utilize the compressors at Ventura Compressor Station in lieu of withdrawal operations to meet customer demand or even inject gas into the storage field, in which case the electric compressors will continue to be utilized first on last off.

Outside of supporting injection at La Goleta, the gas compressors may be required to operate to meet customer demand when the electric compressors are not available due to scheduled or unscheduled maintenance or electrical power outage, when La Goleta withdrawal is not being utilized or is insufficient or is unavailable, when the electric compressors cannot meet the required throughput because of system conditions such as high demand or low suction pressure, or any combination of these scenarios.

RESPONSE 1c.

SoCalGas objects to the term "gas generators" as vague and ambiguous. For purposes of this response, SoCalGas understands CalPA's reference to "gas generators" as intended to mean "gas compressors."

"Non-normal operation" is not a term that SoCalGas utilizes to prioritize its units' operational priorities. The term is typically used when operations and maintenance activities such as compliance testing, planned or unplanned maintenance are considered outside "normal operations".

CalPA's reference to "standby" implies that the gas compressors are not required, however they are part of the overall design requirements of the proposed project. As described in the application, the proposed project describes scenarios where both electric and gas compressors' operations are both necessary.

Please refer to page 2-7 through 2-8 of the PEA which describes the design of a compressor station, "These three parameters—minimum suction pressure, maximum discharge pressure, and required throughput—are used to determine the required horsepower at a station." Please also refer to pages 33-34 of the CPCN, which provides the design parameters in Table below:

Season	Ambient Temperature (°F)	Suction Pressure (psig)	Discharge Pressure (psig)	Flow Rate (MMcfd)
Winter	55	325	1000	120
Summer	80	450	1000	160

As described throughout the PEA and CPCN, SoCalGas utilized these parameters to determine the required horsepower at Ventura Compressor Station. The natural gas compressors, in addition to the electric driven compressors, are required to meet these required design parameters. Please refer to Response 7 for Data Request CalPA_SCG_03 for information on how the compressors were selected. When SoCalGas changed the proposed project from four natural gas compressors to two electric driven compressors and two natural gas compressors, the size of the two natural gas compressors had already been selected to meet the design parameters. The electric-driven compressors have not yet been selected. To minimize local emissions while retaining resiliency, SoCalGas has proposed an operating philosophy where the electric driven compressors are utilized first, if available, before operating the natural gas compressors. This allows for lower local emissions by prioritizing the electric driven compressors, and resilience by utilizing the natural gas compressors, if necessary, when the electric driven compressors are not available.

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QUESTION 2: Please refer to page 40 of SoCalGas' Application.

SoCalGas provides Figure 11 titled "La Goleta Inventory Projection with Proposed Project and Winter 2022/2023 Withdrawal." This figure includes multiple scenarios where La Goleta is run to zero capacity at the end of the withdrawal season.

SoCalGas also claims on page 39 of its Application that,

> "The existing compression equipment at the Ventura Compressor Station does not allow for the inventory at the La Goleta Storage Field to be fully recovered year after year if the examination begins with the field fully depleted at the end of the winter operating season. The Proposed Project would change this and would allow for the storage field to be fully depleted in the winter operating season and still be filled during the summer operating 6 season (even allowing for periodic withdrawals during the summer operating season) such that it is at or near authorized capacity at the start of the next winter operating season."

a) What are the typical start and end dates for the La Goleta injection season?

b) What are the typical start and end dates for the La Goleta withdrawal season?

c) If this Proposed Project is approved, does SoCalGas intend to fully deplete the inventory at La Goleta at the end of a withdrawal season?

d) If this Proposed Project is approved, does SoCalGas intend to fully deplete the inventory at La Goleta at the end of a withdrawal season year after year?

e) In order to fully deplete the inventory of La Goleta Storage Field from full inventory in one withdrawal season, what would be the average daily withdrawal volume (in MMcf/d)?

f) Does SoCalGas anticipate that there will be sufficient gas demand to require La Goleta Storage Field to be depleted in a withdrawal season?

RESPONSE 2:
SoCalGas requested an extension to December 3, 2025, which was granted by Cal Advocates

REVISED RESPONSE 2:

a. Please refer to page 14 of SoCalGas' Application, the summer operating season from April 1st through October 31st is typically the injection season, however injection can occur anytime throughout the year as operationally required.

b. Please refer to page 14 of SoCalGas' Application, the winter operating season from November 1st through March 31st is typically the withdrawal season, however withdrawal can occur anytime throughout the year as operationally required.

c. Please refer to page 35 of SoCalGas' Application, which states "In general, the SoCalGas system operator does not know in advance how much gas will be used from any storage field heading into the winter operating season." It may be necessary to fully utilize the inventory at the La Goleta storage field depending on weather, customer demand and scheduled supplies, and system conditions, and SoCalGas would fully utilize the inventory to maintain reliable continuous service to customers.

d. Please refer to Response 2c of this data request.

e. SoCalGas may require periods of high withdrawal, low withdrawal, no withdrawal, or even injection throughout the winter season, depending on system conditions. However, the full inventory of 21.5 billion cubic feet (BCF) utilized over winter operating season of 151 days is approximately 142 MMcfd of withdrawal on average.

f. There is sufficient natural gas demand on the SoCalGas system to fully utilize the inventory at the La Goleta storage field, as shown on page 168 of the 2024 California Gas Report, the daily average demand in a 1-in-10 cold year is forecast to be 2,300 MMcfd in 2026.

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QUESTION 3: Please refer to page 57 of SoCalGas' Application. SoCalGas notes that it expected declining gas demand in North Coastal System based off the 2022 California Gas Report:

> "SoCalGas's most recent system-level long-term gas demand forecast, as reported in the 2022 California Gas Report (CGR), includes forecasts through 2035. Long-term gas demand forecasts beyond 2035 are not available. SoCalGas additionally does not have gas demand forecasts specifically just for the North Coastal System; thus, for purposes of the Proposed Project, SoCalGas has approximated the regional gas demand forecast through 2035 for all customer classes combined by applying the share of this region's recorded gas demand relative to SoCalGas's recorded system-level demand in 2022 to the system-level yearly gas demand forecast through 2035.
>
> The gas demand forecast thus developed for the North Coastal System indicates that, while gas demand is anticipated to decline slightly—to 52, 48, and 45 MMcfd in 2025, 2030, and 2035…"

Please provide an update of the approximation of regional gas demand decline for the North Coastal System using the recently published 2025 California Gas Report.

RESPONSE 3:

SoCalGas requested an extension to December 3, 2025, which was granted by Cal Advocates.

REVISED RESPONSE 3:

SoCalGas assumes that CalPA meant to reference the 2024 California Gas Report (CGR) not the 2025 CGR. Forecasts are only included in even year CGRs (i.e., 2022 and 2024), not odd years, which are only supplements of the most recent completed year (2024 for the 2025 supplement).

Following are updated approximation of North Coastal System demand for 2025, 2030, and 2035 based on the 2024 CGR:

- 2025: 53 MMcfd
- 2030: 48 MMcfd
- 2035: 47 MMcfd

QUESTION 4: Please refer to the Public SB1221 SoCalGas Map found on SoCalGas' site at the following link: https://www.socalgas.com/regulatory/SB1221Map.

Image 1

Image 1 above shows SB1221 map of the Ventura Site as well as the cites of Santa Barbara and Goleta. The hatched regions are Census Tracts with Foreseeable and Potential Gas Distribution Replacement Projects, while the yellow regions are Disadvantaged Communities (DACs).

Image 2

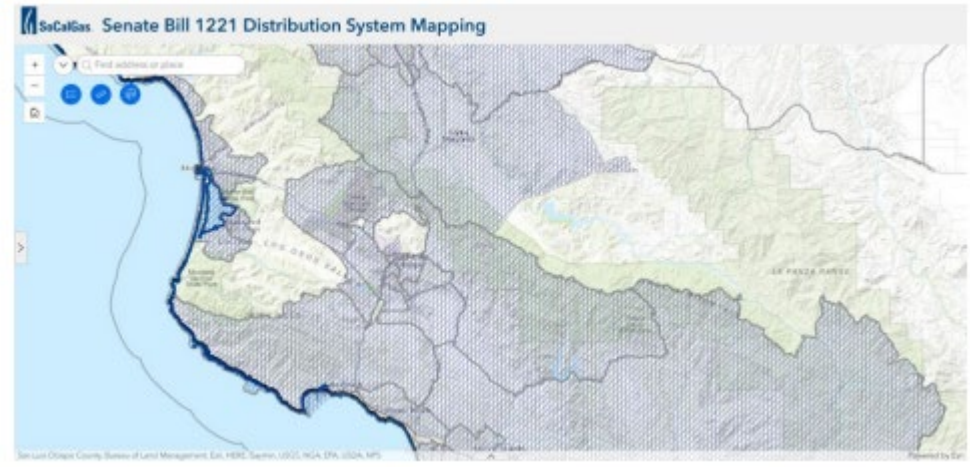

Image 2 above shows the SB1221 Map of the North Coastal System centered around Morro Bay. This region also shows Census Tracts with Foreseeable and Potential Gas Distribution Replacement Projects.

Given the identified potential for electrification projects that would reduce downstream gas use of the Ventura Compressor Station, does SoCalGas anticipate reducing its request for compressor throughput at the Ventura Compressor Station?

RESPONSE 4:

SoCalGas objects to the term "identified potential for electrification projects" as vague and ambiguous. Subject to this objection and without waiver thereof, SoCalGas responds as follows:

No, SoCalGas is currently unaware of any projects that would materially affect the VCM application or alter SoCalGas's position on the need for station modernization. As it relates to the SB 1221 maps identified in this question: on November 13, 2025, the CPUC issued a Proposed Decision which designates three census tracts in Santa Barbara as Priority Neighborhood Decarbonization Zones (PNDZ). A PNDZ is an area in which the Commission could potentially authorize voluntary pilot projects for Zero Emission Alternatives subject to meeting the requirements of SB 1221 including, *inter alia*, pilot program development, cost-effectiveness, equity considerations, and cost recovery. It is uncertain if there will be any pilot projects proposed, approved, or implemented in the identified census tracts. Moreover, the scope of such pilot projects may only impact a small portion of each census tract, and these census tracts represent only a small area downstream of the Ventura Compressor Station. Accordingly, SoCalGas does not anticipate reducing its request for compressor throughput based on these maps at this time.