

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the
Commission's Own Motion into Natural Gas
Prices During Winter 2022-2023 and Resulting
Impacts to Energy Markets.

I.23-03-008
(Filed March 20, 2023)

**JOINT RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) TO ORDER INSTITUTING
INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO NATURAL GAS
PRICES DURING WINTER 2022-2023 AND RESULTING IMPACTS TO ENERGY
MARKETS**

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Pursuant to the California Public Utilities Commission (Commission) Order Instituting Investigation on the Commission's Own Motion into Natural Gas Prices During Winter 2022-2023 and Resulting Impacts to Energy Markets, Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E), hereby submit their response to preliminary matters identified in the OII.¹

I. INTRODUCTION AND BACKGROUND

SoCalGas and SDG&E appreciate the opportunity to provide these comments in response to the questions posed by the Commission regarding the recent spike in natural gas prices in winter 2022-2023. SoCalGas and SDG&E share the Commission's interest in understanding the factors underlying the recent market events to inform development of policies and reforms that

¹ Pursuant to Rule 1.8(d) of the CPUC Rules of Practice and Procedure, SoCalGas has been authorized to submit this Joint Response on behalf of SDG&E.

might serve to protect against the risk of future similar events and mitigate adverse impacts on consumers.

SoCalGas operates an integrated gas transmission system on behalf of both SoCalGas and SDG&E (SoCalGas System), consisting of pipeline and storage facilities designed to transport natural gas supply to primary load centers in Los Angeles and San Diego. Initially, the SoCalGas System received and redelivered gas from the east to the load centers in the Los Angeles Basin, Imperial Valley, San Joaquin Valley, north coastal areas, and San Diego County. As SoCalGas sought to diversify sources of natural gas supply, it built interconnections to concurrently accept natural gas deliveries from the North.

SoCalGas also operates four underground storage facilities in its service territory—Honor Rancho, La Goleta, Playa del Rey, and Aliso Canyon. The SoCalGas System was designed to operate using a combination of underground storage and pipeline supplies to meet customer demand, as flowing natural gas travels slowly at approximately 20-30 miles per hour and SoCalGas's natural gas receipt points, located at the fringes of the service territory, are too far from the load centers to fully support customers' changing needs throughout the operating day. Storage facilities provide supply to customers in response to daily, hourly, and seasonal gas demand, provide a local and strategic supply source, and increase systemwide capacity and flexibility.

California currently receives over 95% of its natural gas supply from out-of-state sources as California-produced local supplies continue to trend downwards.² The SoCalGas System is

² California-sourced production delivered to SoCalGas has declined from 232 MMcfd in 2007 (and 9% of total throughput) to just 86 MMcfd in 2021 (4% of total throughput). (See California Gas and Electric Utilities, *2022 California Gas Report* [hereinafter, 2022 California Gas Report], at 41, available at: https://www.socalgas.com/sites/default/files/Joint_UTILITY_Biennial_Comprehensive_California_Gas_Report_2022.pdf)

also at the terminus of several interstate pipelines delivering gas into California and underground storage serves as the system’s largest contingency resource for flexibility and resiliency, mitigating impacts caused by disruptions in delivery of interstate gas supply. Storage facilities also provide system and market flexibility by providing balancing services and a physical price hedge on gas commodity costs.

Developing and maintaining gas infrastructure (e.g., pipelines, compressors, and storage) is critical to maintaining gas and electric service reliability during peak demand periods and mitigating price volatility. The availability of interstate and intrastate pipeline capacity during periods of high demand provides access to out-of-state supplies that can help mitigate prices and support reliability. To preserve available capacity on its system, SoCalGas strives to schedule its planned system maintenance, which requires taking capacity offline, during off-peak periods. This past winter, SoCalGas System’s available capacity to receive gas supplies from out-of-state delivered by Backbone Transportation Service (BTS) customers³ averaged 2,996 thousand dekatherm per day (MDthd),⁴ and SoCalGas observed an average system utilization rate of

[Report 2022.pdf](#); California Gas and Electric Utilities, *2008 California Gas Report*, at 26, available at: https://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf.)

³ “Backbone Transmission Service Customers” are commonly referred to as shippers who transport gas from SoCalGas System Receipt Points and California Producer interconnects to the SoCalGas City Gate storage fields and end user contracts. All gas delivered to the SoCalGas System must be scheduled under a Backbone Transmission Service Contract.

⁴ Excluding local production receipt capacity. This means if customers deliver that much supply to the SoCalGas System, and there is sufficient customer demand, SoCalGas can redeliver that gas supply to customers. Supplies delivered to the SoCalGas system, however, do not reach these available receipt levels for a variety of reasons, including that customers may choose to use SoCalGas’s balancing service rather than deliver supplies, California production has declined over time, system demand frequently does not require maximum delivery of supply, or flowing supplies may not be available due to weather patterns or maintenance impacting the interstate pipelines upstream of the SoCalGas system.

approximately 89%.⁵ Storage inventory also mitigates prices and supports reliability. At the start of the winter season, SoCalGas's storage inventory was at a 6-year high⁶ and was nearly full at 88 Bcf.⁷ Without this storage inventory, considering the infrastructure constraints on interstate pipelines, price volatility at the SoCal Border and SoCal Citygate trading points may have been greater this past winter.

SoCalGas operated its system safely and reliably during winter 2022-2023 without declaring any system-wide curtailments, or curtailments on the southern portion of SoCalGas's System (Southern System).⁸ This was despite a series of winter storms which brought sustained cold and high demand over several weeks this past winter⁹ and below-average temperatures in the West, stretching from Western Canada to California, which started earlier than in past years and lasted much longer throughout the winter season. This past winter season was the coldest in SoCalGas's service territory in almost 40 years and SDG&E's service territory in at least 50

⁵ Customers do not typically fully balance their supply with their demand even given SoCalGas's balancing rules. While a review of scheduled deliveries shows that customers have used on average 80% of interstate available receipt capacity, SoCalGas adopted utilization factors of 85% and 90% in its 2022-2023 Winter Technical Assessment. These factors reflect SoCalGas's expectation of tighter balancing requirements through this winter season in response to the storage capabilities and supply outlook.

⁶ Of the 92.06 Bcf of allowable working storage on SoCalGas's system, 82.5 Bcf is currently allocated to core and 9.56 Bcf is currently allocated to the Balancing Function.

⁷ SoCalGas's total available storage inventory capacity this winter was 92 Bcf. Pursuant to D.21-11-008, the current maximum allowable inventory at Aliso Canyon inventory is 41.16 Bcf.

⁸ The SoCalGas Southern System is the portion of its transmission system serving Riverside, San Bernardino, Imperial, and San Diego counties. The primary source of supply is the El Paso Natural Gas system at Ehrenberg. The Southern System has no direct access to flowing supplies from other SoCalGas system receipt points other than limited receipts from the TGN system at Otay Mesa and has no direct access to SoCalGas storage assets.

⁹ SoCalGas declared a weather-related Southern System Curtailment Watch effective December 13, 2022, which ended December 17, 2022, and a Systemwide Curtailment Watch effective March 2, 2023, which concluded later the same day.

years. SoCalGas made storage inventory withdrawals throughout the season¹⁰ and utilized operator tools such as Low Operational Flow Orders (OFOs). OFOs are issued to incentivize customers to procure additional flowing supply to meet their daily demand when the system forecast of storage withdrawals used for balancing exceeds the withdrawal capacity allocated to the balancing function. In addition to, and separate from, operating an integrated gas transmission system, SoCalGas procures natural gas for retail core customers of both SoCalGas and SDG&E.¹¹ Pursuant to D.07-12-019, Ordering Paragraph 4, the retail core portfolios of SoCalGas and SDG&E were consolidated into one single portfolio managed by SoCalGas's Gas Acquisition Department, effective April 1, 2008.¹² SDG&E's Energy Procurement department is separately responsible for the procurement of natural gas used in the production of electricity for SDG&E.

To build awareness of expected higher gas prices this past winter, SoCalGas leveraged existing direct customer communications channels, engaged media outlets, and conducted numerous outreach efforts through community organizations and local officials. These communications provided information regarding helpful resources, tools, programs and services available to customers to help with the gas prices.

As presented at the Commission's *en banc* hearing, the U.S. Energy Information Administration (EIA) identified several factors as contributing to the sharp increase in gas prices. These factors include widespread, below-normal temperatures in the West (Western Canada to California), high natural gas consumption, interstate natural gas pipeline constraints, lower

¹⁰ Aliso Canyon storage availability subject to the Aliso Canyon Withdrawal Protocol.

¹¹ SoCalGas and SDG&E's procurement activities are done in compliance with all relevant Commission Affiliate Transaction Rules. (See D.97-12-088; D.01-09-056; D.06-12-029; D.07-12-019.)

¹² D.07-12-019 at 114, OP 4.

imports from Canada, and low natural gas storage inventories in the Pacific Region. Another potential factor that was discussed at the *en banc* was the significant constraint that existed on El Paso Natural Gas Company's (EPNG) transmission system. Additional factors discussed at the *en banc* included decreased availability of hydroelectric power due to prolonged drought resulting in increased competition for natural gas for electric generation, increased reliance on natural gas-powered generation to support increasing levels of intermittent generation, and changes to gas storage levels in Pacific Gas and Electric Company's (PG&E) territory following reclassification of 51 Bcf of natural gas from working gas to base gas.

There are specific concrete steps – both in the near term and the longer term – that can be taken to help avoid or mitigate future similar market events. In the near term, the Commission could mitigate the risk of another gas price spike this coming summer and next winter by authorizing increased inventory at SoCalGas's Aliso Canyon facility, as proposed in SoCalGas and SDG&E's Petition for Modification filed on April 19, 2023, and eliminating the Aliso Canyon Withdrawal Protocol. This could help provide a buffer against supply constraints and elevated prices during winter peak season or high summer demand days. In addition, in the near term, SoCalGas is planning additional customer communications by expanding text (SMS) message options for high natural gas price alerts to customers, to provide additional awareness to support customers with energy and bill management during the winter season.

In the longer term, the Commission could help protect against price spikes by providing avenues for utilities to diversify supplies and reduce reliance on out-of-state gas supplies through facilitating the development and procurement of clean fuels such as clean renewable hydrogen¹³

¹³ D.22-12-055 at 9, fn. 2 (“Clean Hydrogen’ is defined as hydrogen produced with a carbon intensity equal to or less than two kilograms of carbon dioxide-equivalent produced at the site of production per kilogram of hydrogen produced.”).

and renewable natural gas (RNG). The Commission should also review the current interstate pipeline capacity approval process to determine whether modifications are warranted.

Finally, to help mitigate the impact on consumers if gas price spikes do occur, SoCalGas and SDG&E offer bill related reforms and rate-design tools. First, SoCalGas and SDG&E propose that the natural gas California Climate Credit (CCC) be returned to customers in a winter month rather than April of each year. Second, the utilities could proactively offer their levelized payment plan program that allows eligible arrearages to be amortized into future bill payments that are level each month, with an adjustment every six months. For customers who may have difficulty with a single high bill, the utilities could proactively offer their payment plans which are available to extend payment due dates, or to make installment payments over several months. Third, SoCalGas and SDG&E recommend the use of existing gas utility procurement tariff tools, such as amortization, to assist in mitigating the impact to customers during periods of gas market price volatility. In addition, the utilities could explore a potential temporary cap on the commodity cost passed through to customers during a price spike event, subject to subsequent recovery.

II. PROCEDURAL ISSUES

SoCalGas and SDG&E provide the following comments on procedural issues raised by the OII.

A. Categorization.

The OII preliminarily determines that the category for this proceeding is quasi legislative. SoCalGas and SDG&E agree with this categorization to the extent that the Commission is examining the causes and contributing factors of recent gas market volatility in the context of

considering new rules and policies to help mitigate future similar market events and insulate consumers from elevated prices.

B. Evidentiary hearings.

The OII anticipates many of the issues in this proceeding can be addressed through filed comments, public meetings, and/or workshops and preliminarily determined that evidentiary hearings are not needed. SoCalGas and SDG&E agree that the issues raised in the OII may be resolved without the need for evidentiary hearings. If resolution of any of the issues identified in the Scoping Ruling necessitates that the Commission make findings on disputed issues of material fact, however, evidentiary hearings may be required. Depending on the nature of any disputed facts, the Commission may be able to adopt appropriate rules and policies without reaching a determination on disputed factual issues.

C. Confidentiality and Market Sensitive Information.

The OII presents several questions related to gas procurement, operations, and market conditions in the winter months of 2022-2023. To respond to questions and related discovery respondents may be required to provide information that is market-sensitive or otherwise necessitates confidential treatment. In addition, SoCalGas and SDG&E, will need to take care to maintain restrictions on communications and the exchange of market sensitive information between their gas acquisition and gas operations departments to comply with applicable rules. It is unclear at this time what information the Commission will require for purposes of this proceeding. Accordingly, SoCalGas and SDG&E anticipate that they will assess confidentiality and apply appropriate protocols to protect confidential information as the need arises and in response to specific information requests.

III. RESPONSES TO QUESTIONS

The OII provides that Respondents' and other parties' comments submitted in response to the OII should present information regarding market activity that may have affected gas prices during the period November 1, 2022 through March 31, 2023, and should specifically address the questions presented in the OII.¹⁴ SoCalGas and SDG&E's responses to the questions are provided below and are based on information available to SoCalGas and SDG&E at this time.

1. What factors caused or contributed to observed gas price increases beginning on November 1, 2022? Comments shall address market fundamentals as well as other applicable factors.

The Energy Information Administration's (EIA) identified the following factors contributing to natural gas price increases this past winter:¹⁵

- Widespread, below-normal temperatures in the West (Western Canada to California) which led to high natural gas consumption;
- Pipeline constraints, including resulting from system maintenance in West Texas;
- Lower natural gas imports from Canada; and
- Low natural gas storage levels in the Pacific region.¹⁶

The EIA found that these simultaneous events increased demand at the same time that supply was limited due to substantial capacity constraints.

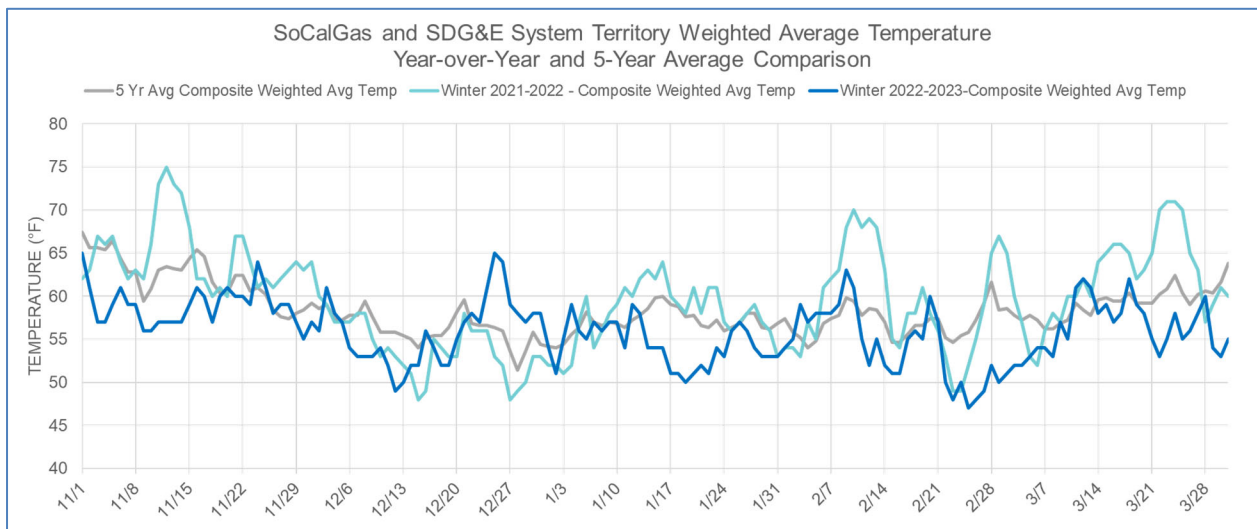
¹⁴ Investigation (I.) 23-03-008, *Order Instituting Investigation on the Commission's Own Motion into Natural Gas Prices During Winter 2022-2023 and Resulting Impacts to Energy Markets*, March 20, 2023 (hereinafter, OII), at 10-11.

¹⁵ EIA Natural Gas Weekly Update, December 22, 2022, available at: https://www.eia.gov/naturalgas/weekly/archivenew_ngwu/2022/12_22/; EIA, Daily natural gas spot prices in western United States exceed \$50.00/MMBtu in December, January 24, 2023, available at: <https://www.eia.gov/todayinenergy/detail.php?id=55279>.

¹⁶ SoCalGas notes that, within its service territory, storage inventory was at a 6-year high on November 1, 2022. However, this could have been higher but for the current maximum inventory limitation at Aliso Canyon.

In SoCalGas’s and SDGE’s combined service territory, below-normal temperatures were observed to have begun much earlier this past winter starting in November (59 °F monthly average), with the system average temperatures approximately 6°F colder than the prior year, and 3°F colder than the 5-year composite average leading to **higher natural gas fueled heating demand for the region almost every day from November 1 through March 31, 2023.**¹⁷ The cold temperatures also persisted for much longer throughout the winter season, with March 2023 ending at 56 °F, which was also 6°F colder than the prior year, and 3°F colder than the 5-year composite average, as shown in Figure 1.

Figure 1



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

¹⁷ Over two-thirds of the winter season’s daily demand exceeded the 5-year daily demand average, and over three-fourths of the winter season’s daily demand exceeded prior winter’s (2021/2022) daily demand.

would accumulate 15 HDD, and PG&E would accumulate 10 HDD. From November 2022 through March 2023, the total HDDs for SoCalGas was 1,436 and 1,495 for SDG&E (see Table 1 and 2 below), which are higher than the total HDDs of the 5-month period of a 1-in-35 cold year¹⁸ weather design in the 2022 California Gas Report. Based on SoCalGas HDD data from 1950-present, this 5-month period was the coldest in SoCalGas’s service territory since the 1984-1985 winter season. Based on SDG&E HDD data from 1972-present, this 5-month period was the coldest in SDG&E’s service territory.

Table 1

SoCalGas Monthly Heating Degree Day (HDD) Weather Designs							
	Cold		Average	Hot		Recorded	
Month	1-in-35 Design	1-in-10 Design		1-in-10 Design	1-in-35 Design	2022/2023 Winter	Note
Nov-2022	146	138	123	108	101	188	Colder than 1-in-35 year
Dec-2022	334	316	282	248	230	300	
Jan-2023	300	284	253	222	206	339	Colder than 1-in-35 year
Feb-2023	257	243	217	191	177	312	Colder than 1-in-35 year
Mar-2023	196	185	165	145	135	297	Colder than 1-in-35 year
Nov. - Mar.	1,233	1,167	1,041	915	849	1,436	Colder than 1-in-35 year

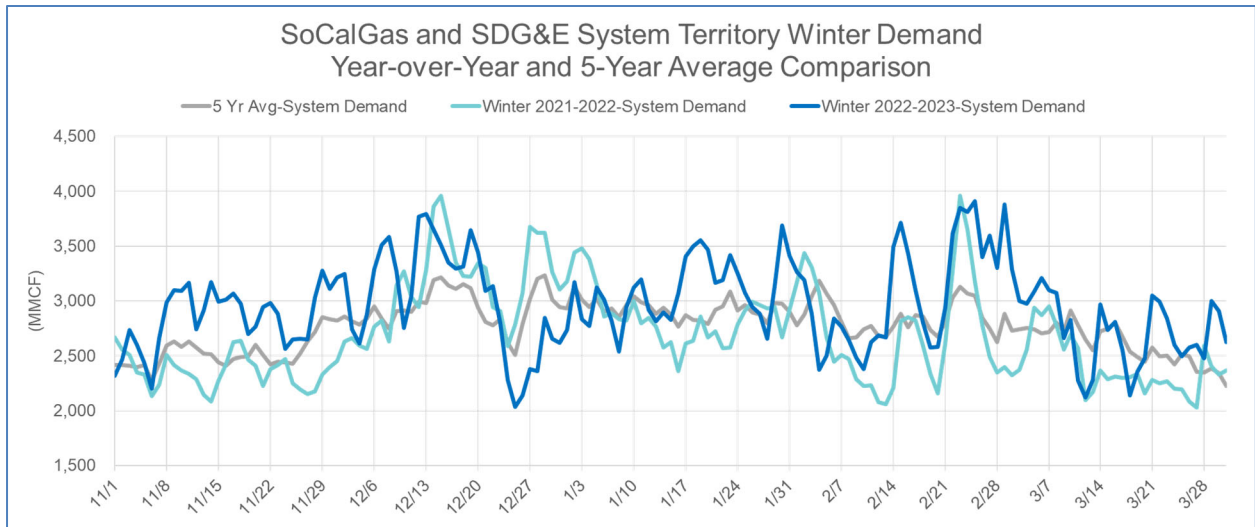
Table 2

SDG&E Monthly Heating Degree Day (HDD) Weather Designs							
	Cold		Average	Hot		Recorded	
Month	1-in-35 Design	1-in-10 Design		1-in-10 Design	1-in-35 Design	2022/2023 Winter	Note
Nov-2022	122	116	103	91	84	217	Colder than 1-in-35 year
Dec-2022	301	285	255	224	208	303	Colder than 1-in-35 year
Jan-2023	278	264	235	207	192	336	Colder than 1-in-35 year
Feb-2023	244	231	206	181	168	335	Colder than 1-in-35 year
Mar-2023	195	185	165	145	135	304	Colder than 1-in-35 year
Nov. - Mar.	1,141	1,080	964	849	788	1,495	Colder than 1-in-35 year

¹⁸ A statistical likelihood of occurrence of 1-in-35 on an annual basis.

Earlier than typical cold temperatures throughout the SoCalGas and SDG&E territories led to increased November demand for residential and commercial building space heating by 24% against the 5-year average. Natural gas use also increased for electricity production by 19% in that same period against the 5-year average. In SoCalGas and SDG&E’s service territories, total gas demand over the winter season (November 1 through March 31) was over 186 MMcfd higher than the 5-year average, which is equivalent to the daily usage of approximately 1.6 million single family homes,¹⁹ with residential and commercial building space heating up 12% relative to the 5-year average and natural gas used for electricity production up 14% relative to the 5-year average. Figure 2 and Table 3 show SoCalGas’s and SDG&E’s combined winter system demand against winter 2021-2022 demand and 5-year average demand as comparison points.

Figure 2



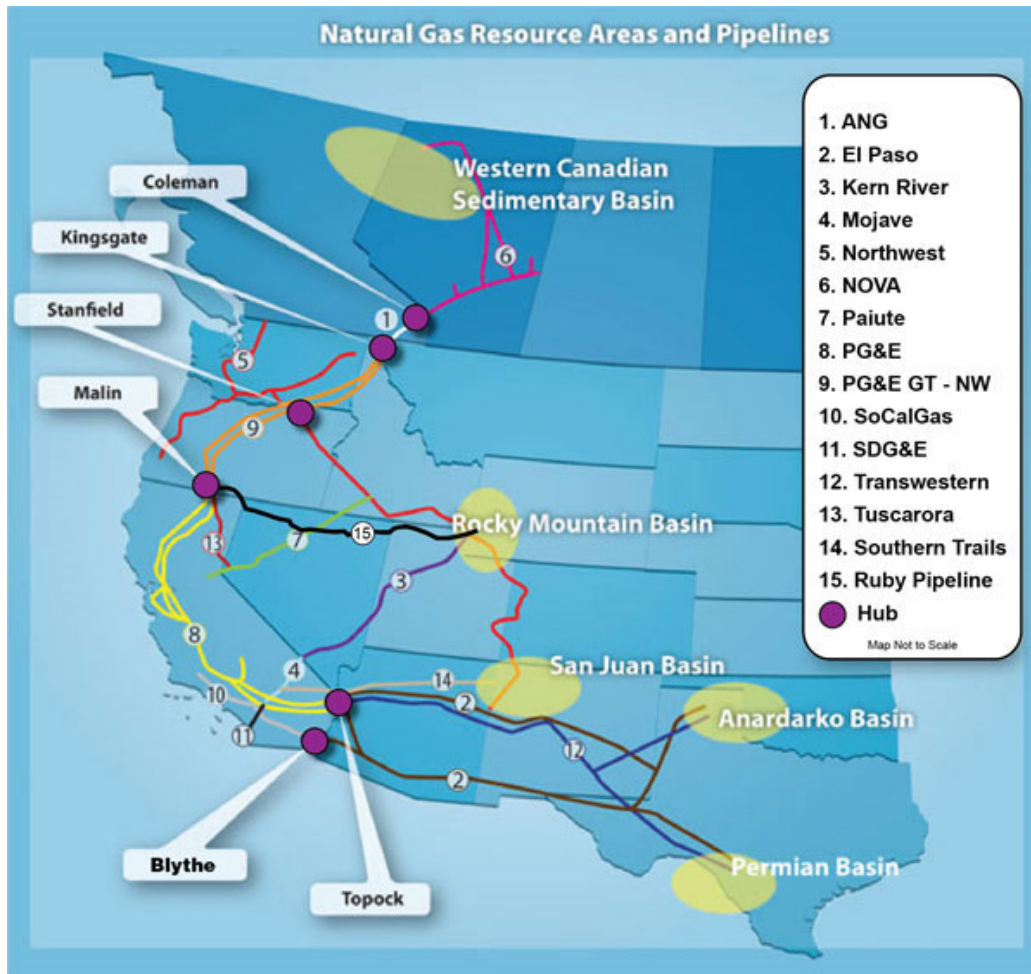
¹⁹ 2022 California Gas Report at 119, Table 27.

Table 3

SoCalGas and SDG&E Territory Monthly Average Winter Demand (MMcf)					
	Nov	Dec	Jan	Feb	Mar
5 Yr Avg	2,517	2,935	2,926	2,849	2,606
2021-2022	2,358	3,106	2,864	2,716	2,398
2022-2023	2,828	3,039	3,082	3,050	2,773

SoCalGas and SDG&E receive gas supplies from several sedimentary basins in the Western U.S. and Canada including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), Rocky Mountains, Western Canada, and local California supplies, which are shown in Figure 3.

Figure 3²⁰



Canadian and Rocky Mountain supplies declined in December 2022, affecting Pacific Northwest and Northern California supplies, and additional interstate maintenance activities also reduced the amount of gas that could be supplied from West Texas and/or San Juan Basin to the western region.²¹

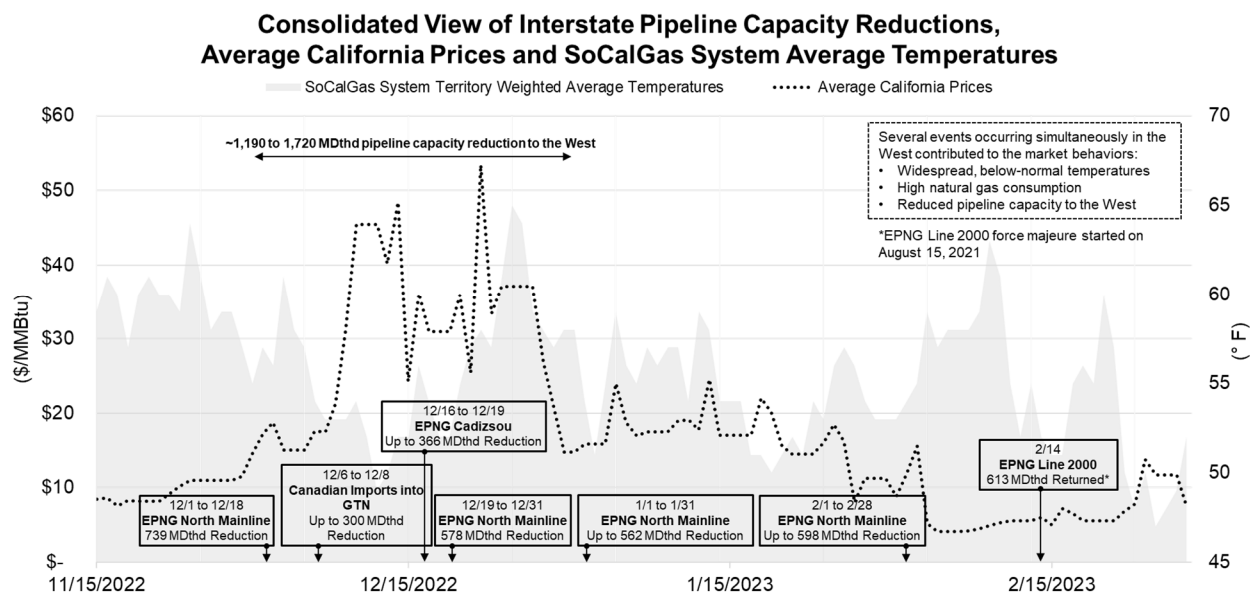
²⁰ CEC, available at: <https://www.energy.ca.gov/media/4503>. This schematic is illustrative and represents a high-level overview of the pipeline systems.

²¹ EIA, *Daily natural gas spot prices in western United States exceed \$50.00/MMBtu in December*, January 24, 2023, available at: <https://www.eia.gov/todayinenergy/detail.php?id=55279>.

EPNG's Line 2000 force majeure outage began on August 15, 2021 and reduced the amount of gas that could be supplied from West Texas to the western region by approximately 600 MDthd (representing approximately 20% of SoCalGas's and SDG&E's combined average daily winter demand) and was not returned to service until February 14, 2023. Several additional maintenance outages on EPNG's system began in December 2022. EPNG's additional maintenance reductions in addition to its Line 2000 force majeure, which were observed to have impacted supplies flowing to the Southwest at Ehrenberg, included maintenance on their North Main Line and at Cadiszou. EPNG indicated on their electronic bulletin board reductions from November 2022 to January 2023 ranging from approximately 273-739 MDthd and 194-366 MDthd respectively, and reductions at Ehrenberg from 479-694 MDthd.

Figure 4 below consolidates a view of average California natural gas prices, SoCalGas System composite temperatures, and significant interstate pipeline capacity reductions identified over the late November 2022 through February 2023 winter period. This figure indicates a correlation between natural gas price increases to colder temperatures and interstate pipeline constraints to supplies from West Texas.

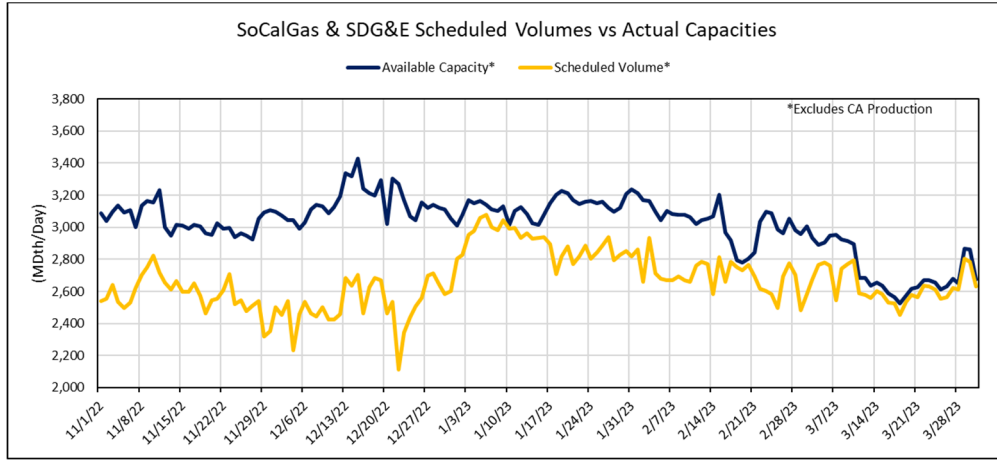
Figure 4²²



This past winter, SoCalGas System available pipeline capacity averaged at 2,996 Mdthd, consistent with SoCalGas’s longstanding practice of scheduling planned system maintenance activities on pipeline and storage infrastructure to off-peak periods, when practicable, to minimize net impacts to system capacity during peaks and to safeguard reliability. The SoCalGas System observed an 82% system utilization rate by BTS customers bringing in gas supplies in early winter (November-December) which improved to approximately 89% system utilization for the total winter season (see Figure 5).

²² Average California Prices were compiled from Natural Gas Intelligence (NGI) published daily indexes for Malin, Southern Border PG&E, PG&E Citygate, SoCal Citygate and SoCal Border Avg. for the relevant time period.

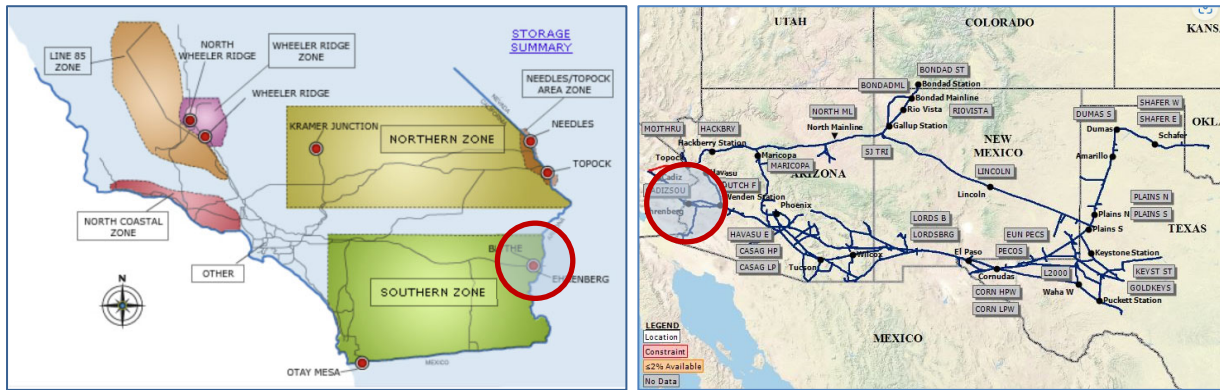
Figure 5



SoCalGas relies heavily on the EPNG system, especially when it comes to the Southern System which lacks storage assets and has less access to flowing supplies. Not only does the EPNG system provide supply availability, but it is also critical in meeting the reliability of the Southern System and the demand of those customers connected to it, including the entire SDG&E territory (see Figure 6).

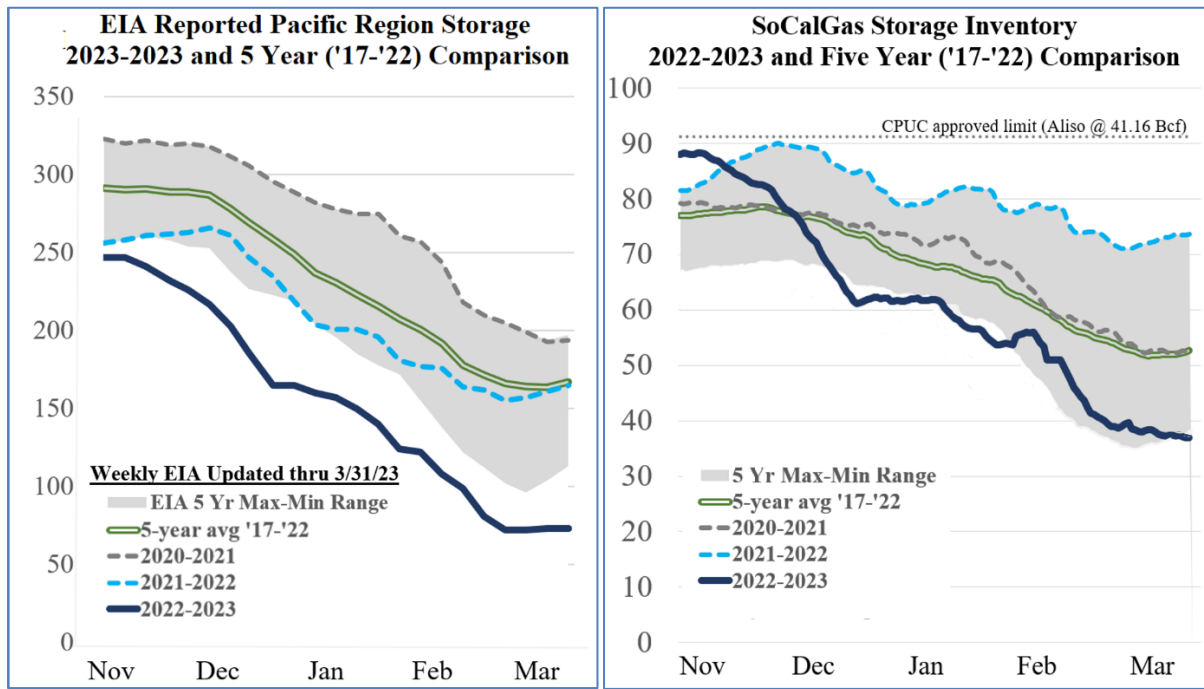
Figure 6

SoCalGas and EPNG Transmission Systems



Natural gas storage inventories in the Pacific Region were -15% (below) their 5-year average at the start of the winter season (see Figure 7).²³ However, SoCalGas’s storage levels on November 1, 2022²⁴ were the highest in the last 6 years (88 Bcf) and close to the maximum level SoCalGas is currently permitted to store at its storage facilities.²⁵ As described herein, below-normal temperatures were observed to have begun much earlier this past winter starting in early November. Nonetheless, SoCalGas had sufficient inventory to meet reliability requirements for the winter.

Figure 7



²³ See EIA, *Weekly Natural Gas Storage Report*, April 13, 2023, <https://ir.eia.gov/ngs/ngs.html>.

²⁴ SoCalGas typically injects natural gas into storage during the months of April through October and usually withdraws natural gas from storage during the months of November through March.

²⁵ SoCalGas’s storage capacity limits are regulated by CalGEM and the CPUC. As of October 2022, SoCalGas had about 88 BCF in its storage inventory (inclusive of Aliso Canyon), including inventory space used for system balancing, and the inventory held by wholesale customers and core aggregators in November 2022, which has been its highest level in the past six years.

Longstanding western drought conditions resulted in historically low reservoir levels, which in turn affected potential hydro production, thus increasing reliance on gas-fired generation. It can also be observed that, as the western region decarbonizes and increases its reliance on intermittent energy sources (renewables), while displacing baseload resources with no replacement (e.g., coal plant retirements), the amount of natural gas usage for power across the West has increased.²⁶

Natural gas storage in PG&E's territory is another consideration that was discussed at the Commission's *en banc*. In June 2021, PG&E reclassified 51 Bcf of natural gas in its storage system from working gas to base gas. As PG&E explained during the Commission's *en banc*, "the working natural gas inventory effectively has been acting as base²⁷ gas even before the reclassification formalized this change."²⁸ A recent California Energy Markets article highlighted analyst concerns related to storage levels in the Western Region:

The status of Western natural gas storage and what currently low levels might portend for reliability moving into the traditional injection season is an ongoing concern for analysts, some of whom contend reliability is now a year-round concern.

Of particular concern is Pacific Gas & Electric natural gas storage, which analysts have said is now low, giving "little room for error" in balancing.

Energy GPS analysts said it is unlikely for that system to fully recover from reclassification and the draw on demand by next winter. They said the combination of "one of the coldest winters in the past three decades" and "a lack of hydro power

²⁶ Natural Gas Intelligence, *North American Coal Retirements, Asian LNG Demand Drive Global Natural Gas Rebound in 2023, GECF Says*, April 10, 2023, <https://www.naturalgasintel.com/north-american-coal-retirements-asian-lng-demand-drive-global-natural-gas-rebound-in-2023-gecf-says/>.

²⁷ EIA defines Base (cushion) gas as the volume of gas needed as a permanent inventory to maintain adequate reservoir pressures and deliverability rates throughout the withdrawal season.

²⁸ PG&E, *En Banc on Current Gas Market Conditions and Impacts of Gas Prices on Electricity*, February 7, 2023, at slide 5, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/industries-and-topics/meeting-documents/20230207-en-banc/20230207-en-banc---pge-presentation.pdf?sc_lang=en&hash=69FAF2D890D4A5C6F75785ECD7E575F1.

generation in the Pacific Northwest" has increased the amount of natural gas used for power across the West.²⁹

In addition to these regional issues, tight international gas markets have also impacted U.S. natural gas prices.

2. Did any of the entities under our regulatory jurisdiction play a role in causing the increase in California border prices between November 1, 2022 and March 31, 2023?

Market prices may be influenced by the individual and collective activities of market participants, which in the western U.S. gas market includes both Commission jurisdictional and non-jurisdictional entities. These include but are not limited to: gas producers, marketers, banks, private equity, hedge funds, exchange-traded funds (ETFs), electric generators, electric utilities, natural gas utilities, municipalities, pipelines, independent storage operators (ISPs), asset managers, industrial users, and independent traders. In addition, see response to Question 1 above regarding potential factors that contributed to the price spike.

3. What actions can the CPUC or other entities take to avoid the likelihood that similar price spikes will occur in the future?

SoCalGas and SDG&E recommend parties in this proceeding consider the long-term actions that the Commission and/or other entities could take to mitigate the likelihood of similar price spikes occurring in the future. In the interim, SoCalGas and SDG&E propose immediate short-term actions the Commission could take to potentially mitigate these issues from occurring in the near future. Specifically, SoCalGas and SDG&E recommend increasing available gas

²⁹ California Energy Markets, *Analysts Point to Western Natural Gas Storage-Level Concerns*, March 31, 2023, https://www.newsdata.com/california_energy_markets/regional_roundup/analysts-point-to-western-natural-gas-storage-level-concerns/article_e6b16f96-cff2-11ed-b4ef-5bedee55afa7.html.

supply by eliminating the Aliso Canyon Withdrawal Protocol (ACWP) and increasing the maximum allowable inventory level at Aliso Canyon.

a. Near term mitigation solutions.

- i. The Commission should authorize SoCalGas to increase inventory levels at Aliso Canyon to 68.6 BCF.

On April 19, 2023, SoCalGas and SDG&E filed a Joint Petition for Modification (PFM or Petition) of Decision (D.) 21-11-008, which establishes an interim limit for Aliso Canyon storage capacity at 41.16 billion cubic feet (Bcf).³⁰ SoCalGas and SDG&E are requesting the Commission take expedited action to increase the inventory limit at Aliso Canyon to 68.6 Bcf, a limit deemed safe by the California Geologic Energy Management Division (CalGEM),³¹ to help mitigate against future price spikes.³² The Commission has recognized that the natural gas inventory level at Aliso Canyon has an economic impact on market prices and natural gas and electricity costs paid by customers.³³ On October 1, 2021, a Proposed Decision (PD) was issued in I.17-02-002 that set the interim inventory level of Aliso Canyon at 68.6 BCF, based in part upon the available pipeline receipt capacity as recommended by Commission staff. The Assigned Commissioner issued an Alternate PD (APD) which set the interim maximum inventory level of Aliso Canyon at 41.16 Bcf. The APD was then approved by the Commission as D.21-11-018. In setting the Aliso Canyon inventory level at 41.16 Bcf, D.21-11-008 made

³⁰ I.17-02-002, *Southern California Gas Company (U 904 G) Petition for Modification of Decision*, April 19, 2023.

³¹ Staff of the CPUC, *Aliso Canyon I.17-02-002 Phase 2: Modeling Report*, January 26, 2021, at 9.

³² I.17-02-002, *Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) Joint Petition for Modification of Decision*, April 19, 2023; *Joint Motion of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) to Shorten Time to Respond to Petition for Modification of Decision*, April 19, 2023.

³³ D.21-11-008 at 8.

clear that the limit was temporary and would be revisited as necessary: "When it becomes appropriate to revisit the maximum allowable inventory, we will do so."³⁴ It seems that now is the appropriate time to revisit the maximum allowable inventory at Aliso Canyon.

As Mark Pocta of the Commission's Public Advocates Office highlighted during the Commission's *en banc*:

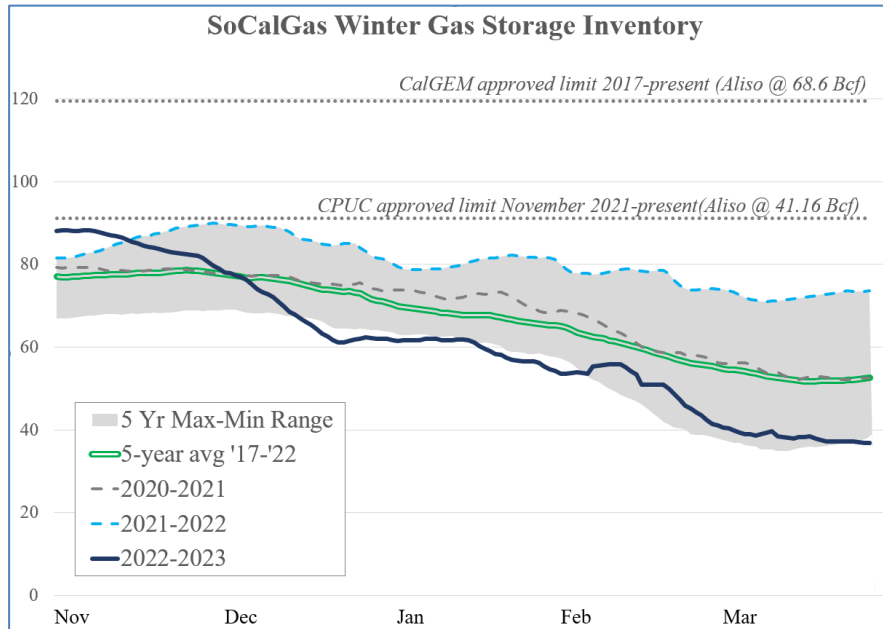
The Commission set a range back in 2021 for Aliso Canyon. They could operate between zero and 41 Bcf. At that time, there was a concurrent proposed decision by administrative law judge that would have proposed to accept the interim range and how a maximum from zero to 68.6 Bcf. So you saw that under SoCal charts, so that additional capacity would provide more storage capacity for the market. So again, the utilization of Aliso Canyon, is another matter that the Commission will need to consider closely moving forward.³⁵

The chart in Figure 8 below illustrates what the potential maximum inventory would have been with Aliso Canyon at 68.6 Bcf.

³⁴ *Id.* at 20.

³⁵ CPUC, *En Banc, Current Gas Market Conditions & Impacts of Gas Prices on Electricity Markets*, February 7, 2023, Cal Advocates Presentation by Marc Pocta, at 1:04:29-1:06:56, recording available at: https://www.adminmonitor.com/ca/cpuc/en_banc/20230207/.

Figure 8



The gas purchased and stored at Aliso Canyon was purchased at prices lower than what was available at market prices this past winter. The additional source of supply from Aliso Canyon likely contributed to a dampening effect on price volatility at the SoCal Border and SoCal Citygate trading points. In other words, if it were not for the availability of Aliso Canyon's supply, prices might have been even higher.

If the maximum allowable inventory at Aliso Canyon was set to 68.6 Bcf, as opposed to the current 41.16 Bcf, the additional supply might have mitigated intrastate pipeline capacity constraints inhibiting out-of-state supplies. In addition, starting the winter season with higher storage inventories would support higher withdrawal capacities for the latter part of the winter season. Higher storage volumes generally equate to higher storage withdrawal rates. This would serve to dampen price volatility and provide additional price hedging benefits to customers on the SoCalGas System. Notably, on November 1, 2022, Aliso Canyon had a total inventory of

40.345 Bcf.³⁶ In SoCalGas's Summer 2022 Technical Assessment, SoCalGas found that it would have 66.3 Bcf of excess supply (excluding Otay Mesa supply) under the best-case supply scenario,³⁷ which it could use to inject at Aliso Canyon but for the limitation of 41.16 Bcf.³⁸ Actual receipt capacity during the summer 2022 operating season exceeded the best-case supply scenario presented in the Technical Assessment.³⁹ Accordingly, but for the 41.16 Bcf limitation at Aliso Canyon, there may have been additional inventory at Aliso Canyon on November 1, 2022 and throughout the winter season, including inventory allocated to the Unbundled Storage Program.

In order to mitigate against potential similar price spikes in the future, the Commission should allow SoCalGas to increase Aliso Canyon's inventory to 68.6 Bcf. Further, SoCalGas's 2023 Summer Technical Assessment provides that SoCalGas expects to have sufficient capacity and supply to fill its storage fields by the end of the 2023 summer season.⁴⁰ SoCalGas's

³⁶ SoCalGas ceases injecting prior to reaching the 41.16 Bcf current inventory limitation to verify it does not exceed the limitation and to mitigate against the potential for high operational flow orders (OFO).

³⁷ SoCalGas, *SoCalGas Summer 2022 Technical Assessment*, March 30, 2022, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=242505&DocumentContentId=76010>. SoCalGas Operations does not purchase and store gas supply for the use of any customer. SoCalGas' Gas Acquisition department purchases supplies for storage only for the SoCalGas retail core and the SDG&E wholesale core market segment, excluding those core customers served by Core Transport Agents as part of a Core Aggregation Transportation (CAT) program and other wholesale providers. SoCalGas Operations can only make pipeline and storage capacity available to market participants; the Technical Assessment found that sufficient capacity would be available to fill storage to the cited levels if market participants made use of that capacity to deliver gas supply.

³⁸ *Id.* at 7.

³⁹ The best-case supply scenario in the Summer 2022 Technical Assessment assumed 559.8 Bcf of supply for the entire summer season, excluding Otay Mesa supply. (See *SoCalGas Summer 2022 Technical Assessment* at 7.) Actual receipt capacity for the summer 2022 season was 620.6 Bcf.

⁴⁰ SoCalGas, *SoCalGas Summer 2023 Technical Assessment -Revised*, April 13, 2023, at 7, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=249688&DocumentContentId=84327>. (On April 14, 2023, as a courtesy, SoCalGas served the Summer 2023 Technical Assessment on parties to I.17-02-002).

Technical Assessment shows excess pipeline supply of approximately 53 Bcf over the 2023 summer season, some of which could potentially be stored at Aliso Canyon if the Commission's inventory limitation of 41.16 Bcf were lifted.⁴¹ For example, if the maximum allowable inventory limitation at Aliso Canyon was increased to 68.6 Bcf, SoCalGas expects it would have sufficient excess supply to fill Aliso Canyon by November 1, 2023.⁴² Notably, increasing the maximum inventory at Aliso Canyon to 68.6 Bcf would also enable SoCalGas to reinstate the Unbundled Storage Program,⁴³ providing SoCalGas customers the opportunity to contract for 27 Bcf of storage inventory that could be filled during lower priced months and withdrawn during higher priced months. Further, increasing the storage inventory at Aliso Canyon and eliminating the ACWP, as discussed further below, could help mitigate OFOs. For example, a Low OFO occurs when the Forecasted Total Daily Customer imbalance is greater than the Storage withdrawal limit for Load Balancing. Increasing the inventory at Aliso Canyon, which would increase the Load Balancing storage inventory allocation,⁴⁴ and eliminating the Aliso Canyon Withdrawal Protocol, which would include Aliso Canyon's withdrawal capacity in the OFO calculation, could help mitigate OFOs. In addition, if the Unbundled Storage Program is reinstated and customers contract for storage, those customers may be able to use storage to mitigate OFO penalties.

⁴¹ *Ibid.*

⁴² *Ibid.*

⁴³ D.20-02-045.

⁴⁴ If the maximum allowable inventory at Aliso Canyon is increased to 68.6 Bcf, 0.44 Bcf of additional storage inventory would be allocated to Load Balancing and 27 Bcf would be allocated to the Unbundled Storage Program.

- ii. The Commission should eliminate the ACWP to provide additional flexibility and supply in winter months.

On April 19, 2023, SoCalGas requested the Commission immediately eliminate the ACWP to help mitigate against price volatility.⁴⁵ The ACWP currently prohibits SoCalGas from making withdrawals from Aliso Canyon, including in peak winter months, except under specified conditions. These conditions were designed to permit SoCalGas to make withdrawals only to address certain operationally constrained conditions and maintain reliability.

Specifically, the ACWP provides that SoCalGas may withdraw from Aliso Canyon if any of the following conditions are met: (1) Preliminary low Operational Flow Order (OFO) calculations for any cycle result in a Stage 2 low OFO or higher for the applicable gas day; (2) Aliso Canyon is above 70% of its maximum allowable inventory between February 1 and March 31; in such case, SoCalGas may withdraw from Aliso Canyon until inventory declines to 70% of its maximum allowable inventory; (3) The Honor Rancho and/or La Goleta fields decline to 110% of their month-end minimum inventory requirements during the winter season; and/or (4) There is an imminent and identifiable risk of gas curtailments created by an emergency condition that would impact public health and safety or result in curtailments of electric load that could be mitigated by withdrawals from Aliso Canyon.⁴⁶ The ACWP provides that it “shall remain in effect, subject to modification, through the completion of the CPUC Investigation (I.) 17-02-002 **or such time as determined based on conditions.**”⁴⁷

⁴⁵ SoCalGas Letter to Deputy Executive Director for Energy and Climate Policy, Re: Aliso Canyon Withdrawal Protocol, April 19, 2023.

⁴⁶ CPUC, *Aliso Canyon Withdrawal Protocol*, July 23, 2019, at 1, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/news_room/newsupdates/2020/withdrawalprotocol-revised-april12020clean.pdf

⁴⁷ *Id.* at 3 (emphasis added).

The current ACWP was made effective July 23, 2019, with noticing and reporting requirements updated April 1, 2020.⁴⁸ When the Commission updated the ACWP conditions in July 2019, it explained that it did so for several reasons, including a focus on improving price stability in the Southern California region.⁴⁹ In particular, the Commission noted that combined natural gas pipeline outages and operational restrictions on Aliso Canyon led to extraordinarily high natural gas and electricity prices.⁵⁰ Subsequently, the Commission found that the changes to the ACWP contributed to natural gas and electricity prices remaining relatively stable during summer 2019.⁵¹ Specifically, the Commission noted:

Summer 2019 was the first season without abnormal gas price volatility since October 2017, when the region began experiencing the combined impacts of the Line 235-2 rupture and the Aliso Canyon storage field restrictions. Generally, moderate weather, high production from out-of-state gas and oil wells, ample hydroelectric energy, **and revisions to the Aliso Canyon Withdrawal Protocol contributed to a stabilizing of average gas prices.**⁵²

⁴⁸ *Ibid.*

⁴⁹ CPUC, Letter Re: Aliso Canyon Withdrawal Protocol to Stakeholders and Parties to Proceedings I.17-02-002, A.18-07-024, and A.17-10-007, July 23, 2019, at 1, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/news_room/newsupdates/2019/coverletter-alisocanyonwithdrawalprotocol-2019-07-23.pdf.

⁵⁰ CPUC, Letter Re: CPUC Proposed Revisions to Aliso Canyon Withdrawal Protocol to Stakeholders and Parties to Proceedings I.17-02-002, A.18-07-024, and A.17-10-007, July 1, 2019, at 1, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/news_room/newsupdates/2019/alisocanyonwithdrawalprotocol-letter-2019-07-01.pdf.

⁵¹ Staff of the CPUC, *Summer 2019 SoCalGas Conditions and Operations Report*, July 20, 2020, at 4, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/news_room/newsupdates/2020/summerlookback2019report-final.pdf.

⁵² *Id.* at 14 (emphasis added).

The California Independent System Operator (CAISO) also acknowledged the positive impacts of revising the ACWP.⁵³ While the market saw positive impacts because of the changes, the existence of the ACWP continues to limit the availability of the facility to the market. Market participants with gas in storage are not able to rely on the availability of the gas in storage at Aliso Canyon, which may artificially increase the demand and price for flowing supplies. Higher inventory and access to Aliso Canyon would remove some of the supply uncertainty from the market. Therefore, to help mitigate price spikes in the future, the Commission should immediately eliminate the Protocol. SoCalGas also notes that if the ACWP remains in place, the Unbundled Storage Program will not be as useful to the market since it prevents unbundled storage customers from accessing their supplies in storage.

- iii. SoCalGas will expand use of text messaging to keep customers informed of elevated gas costs and support options.

In addition, SoCalGas is planning additional customer communications by expanding text (SMS) message options for high natural gas price alerts to customers who opt-in, as means to provide additional awareness to support customers with energy and bill management during the winter season. For additional detail on customer communications please see response to Question 7 below.

b. Longer term mitigation solutions.

The Commission should also consider longer-term actions it and/or other entities could take to mitigate the likelihood of similar price spikes occurring in the future. These include

⁵³ CAISO, *2020 Summer Loads and Resources Assessment*, May 15, 2020, at 13 (“Specifically, on July 23, 2019 the CPUC made revisions to the Aliso Canyon Withdrawal Protocol to remove its classification as “an asset of last resort” to provide SoCalGas with more flexibility to use Aliso Canyon to balance the system and ease energy price spikes.”), available at: <https://www.caiso.com/Documents/2020SummerLoadsandResourcesAssessment.pdf>.

options to diversify gas supply and increase availability and utilization of interstate pipeline capacity.

- i. The Commission should promote diversification of supply and reduce reliance on imports with clean renewable hydrogen and renewable natural gas.

California currently receives over 95% of its natural gas supply from out-of-state sources. This reliance makes California especially vulnerable to interstate infrastructure constraints, including those experienced during this winter season. The Commission could help protect against price spikes by providing avenues for utilities to diversify supplies and reduce reliance on out of state gas supplies through facilitating the development of clean fuels such as clean renewable hydrogen and RNG.

SoCalGas's mission is to build the cleanest, safest, most innovative energy infrastructure company in America, and we are working to realize this future through innovation and decarbonization. In 2021, SoCalGas announced its aspiration to achieve net zero greenhouse gas (GHG) emissions in our operations by 2045.⁵⁴ SoCalGas also released its Clean Fuels Whitepaper, a comprehensive technical analysis that examines pathways to achieve California's carbon neutrality goals through a more integrated, resilient, and reliable and affordable energy system, which showed the essential role clean fuels can play in our energy future.⁵⁵

The use of hydrogen, either blended with natural gas, or delivered via a dedicated pipeline, is one important component of SoCalGas's strategy to achieve net zero emissions in its

⁵⁴ SoCalGas, *ASPIRE 2045: Sustainability and Climate Commitment to Net Zero*, available at: https://www.socalgas.com/sites/default/files/2021-03/SoCalGas_Climate_Commitment.pdf.

⁵⁵ SoCalGas, *The Role of Clean Fuels and Gas Infrastructure in Achieving California's Net Zero Climate Goal*, October 2021, available at: https://www.socalgas.com/sites/default/files/2021-10/Roles_Clean_Fuels_Full_Report.pdf

operations and the energy it delivers by 2045. Hydrogen can leverage the current natural gas system through blending hydrogen alongside natural gas in existing gas transmission and delivery infrastructure. In fact, in December 2022, the Commission ordered the four main gas utilities to either file a new or amend an existing application proposing hydrogen blending pilot projects;⁵⁶ an amended application filed in a pre-existing proceeding is expected by the end of 2023.⁵⁷ In the same month, the Commission approved SoCalGas's request to track costs for advancing the first phase of the Angeles Link Project,⁵⁸ a proposed clean renewable hydrogen pipeline system that could deliver clean, reliable, renewable energy to the Los Angeles region. As envisioned, Angeles Link could be the nation's largest clean renewable hydrogen pipeline system and support significantly reducing greenhouse gas emissions from electric generation, industrial processes, heavy-duty trucks, and other hard-to-electrify sectors of the Southern California economy. SoCalGas recognizes the Commission's pending SB 380 proceeding investigating the feasibility of reducing or eliminating the use of Aliso Canyon for natural gas storage, while maintaining energy and electric reliability for the Los Angeles region at just and reasonable rates.⁵⁹ While Aliso Canyon is critical today to meet these objectives and an increased inventory limit will further enhance the value it provides, introducing a clean renewable hydrogen energy transport system into the Los Angeles Basin would provide a clean alternative fuel to help to alleviate natural gas demand served by Aliso Canyon in the long term, supporting (along with other clean energy projects and reliability efforts, such as those being

⁵⁶ D.22-12-057.

⁵⁷ A.22-09-006, *Assigned Commissioner's Scoping Memorandum and Ruling*, March 3, 2023; available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M502/K980/502980995.PDF>.

⁵⁸ D.22-12-055.

⁵⁹ I.17-02-002, *Order Instituting Investigation*, February 17, 2017.

evaluated in the SB 380 Proceeding) a path to its ultimate closure while maintaining energy system reliability.

California's Renewable Gas Standard (RGS), established in D.22-02-025 pursuant to Senate Bill (SB) 1440, also provides an opportunity to reduce California's reliance on out-of-state gas by at least 12% of core throughput by 2030. To achieve the procurement goals established by D.22-02-025, the Commission should identify and remove barriers of entry that are inhibiting the development of California biomethane producing facilities in this space. Supporting the development of projects that meet the RGS eligibility criteria established by the Commission would provide utilities with access to in-state gas that could help mitigate the exposure to out-of-state gas supplies while advancing California's net zero goals, all while providing local climate benefits.

- ii. The Commission should review interstate pipeline capacity procurement process.

The Commission should review the current interstate pipeline capacity approval process to determine whether modifications are warranted to allow gas utilities to submit competitive bids in open seasons and secure interstate capacity. In D.04-09-022, the Commission recognized the need for a clearly articulated interstate pipeline capacity approval process, which is flexible and provides for expeditious processing and appropriate regulatory oversight, to provide the utilities with the opportunity to acquire needed core capacity in the most efficient and most cost-effective manner.⁶⁰ The decision established a pre-approval process for interstate pipeline capacity contracts within a contract length limit of 3 years and capacity amount limits (100

⁶⁰ D.04-09-022 at 85-86, FOF 4.

MMcfd for SoCalGas and PG&E and 20 MMcfd for SDG&E).⁶¹ The Commission should review the pre-approval contract criteria and determine whether it is still appropriate. Potential modifications could include allowing gas utilities to enter into contract transportation capacity contracts with longer delivery periods, so that gas utilities can submit competitive bids in open seasons and secure interstate capacity. The inability to submit competitive bids has the potential to increase costs and risk securing interstate capacity. This is most important for interstate capacity contracts for the Southern System where there is a greater reliance on flowing supplies.

4. What actions can the CPUC take to mitigate the harm to ratepayers if such price spikes do recur?

SoCalGas and SDG&E have and continue to utilize a wide array of tools, with Commission assistance where needed, to assist customers as they navigate this unusual period (e.g., early and frequent communication, promotion of energy efficiency measures, bill assistance through payment plans, the Gas Assistance Fund, and supporting the acceleration of the climate credit). In addition, customer programs such as energy efficiency and demand response can mitigate harm to ratepayers. SoCalGas and SDG&E's energy efficiency offerings and market support for new energy efficiency solutions affordably reduce energy consumption and emissions for SoCalGas customers, and result in customer savings. In addition, gas demand response programs may provide load shifting from times when gas prices are high to other times when gas prices are lower, the delta in prices translating to cost savings for customers.

The California Cap-and-Trade Program is a state program designed to reduce greenhouse gas emissions. Each year the state auctions a limited number of emissions permits so that California can meet its goal of reducing overall emissions. The Commission directs investor-

⁶¹ *Id.* at 86, FOF 9.

owned utilities to distribute some of the auction proceeds generated by the Cap-and-Trade Program as a credit (California Climate Credit or CCC) to residential customers, and for clean energy and energy efficiency programs. D.15-10-032, and as affirmed in D.18-03-017, authorized greenhouse gas (GHG) allowance proceeds, net of reasonable GHG compliance costs and expenses, to be returned to residential customers as a natural gas “California Climate Credit” each April beginning in 2016. Accordingly, a portion of the funds raised through the program are distributed annually in April to SoCalGas and SDG&E customers in the form of bill credits.

In response to the unprecedented market conditions and the resulting impact on customer gas rates, the Commission voted to accelerate the annual credit to February or March, depending on customers' individual billing cycles. D.23-02-014 clarified that, for gas utilities, the acceleration of the April 2023 CCC applied to the natural gas credit only and the normal schedule for CCC disbursements for residential customers would resume as of May 2023. To mitigate against potential future winter price spikes, SoCalGas recommends the Commission authorize distribution of the CCC in a winter month rather than April of each year. SoCalGas and SDG&E recommend the natural gas CCC be provided to customers in January or February given that those months are usually colder and there is typically more price volatility, as opposed to March or November. SoCalGas also supports Senate Bill 429 which would require the cap-and-trade climate credit to be returned to residential customers in the month of February.

Another action that has already been proposed, but which has added relevance within the context of this OII, is SoCalGas’s residential transportation rate design proposal in the pending Cost Allocation Proceeding.⁶² In that proceeding, SoCalGas has proposed an enhanced two-tier, income-based residential fixed charge. The fixed customer charge for non-CARE customers

⁶² A.22-09-015.

would increase in a phased-in approach from its current \$5 per month to \$10 per month in 2025, \$15 per month in 2026, and \$20 per month in 2027. SoCalGas also proposes to establish a separate, lower CARE fixed customer charge which, when taking into account the 20% CARE discount, will be effectively 50% below the non-CARE fixed customer charge.⁶³ In the long run, enhanced fixed charges will help to remedy the inherent cost shift as some customer loads begin to shift away from gas service via fuel substitution (e.g., appliance electrification), and for customers who partially electrify promotes paying a fair share of the fixed costs associated with maintaining their gas service.⁶⁴ But in the short run, many customers who are most exposed to high volumetric rates would see an annual average bill decrease with this proposal, while crucially having the effect of reducing month-to-month bill volatility by decreasing winter bills and collecting more transportation-related revenue requirement in the non-winter months. Commission action on this proposal would be an additional tool to support affordability during the peak demand season, while maintaining conservation price signals.

SoCalGas has and continues to inform and offer several ways to help customers through our bill and home improvement assistance programs, bill forgiveness plan, and the level-pay program. In addition, SoCalGas has, in 2023, contributed \$11 million in shareholder funding to provide additional relief to low-income families, seniors, and small restaurant owners, impacted by the unprecedented regional natural gas market prices, as follows:

⁶³ A.22-09-015, Chapter 13, Prepared Direct Testimony of Iftekharul (Sharim) Chaudhury on Behalf of Southern California Gas Company and San Diego Gas & Electric Company, Rate Design, at 14-27.

⁶⁴ A.22-09-015, Chapter 14, Prepared Direct Testimony of N. Jonathan Peress on Behalf of Southern California Gas Company and San Diego Gas & Electric Company, Long-Term Policy and Energy Transition, at 14.

- \$6 million towards the Gas Assistance Fund, a program administered by the United Way to provide one-time grants to income-qualified customers to help pay their natural gas bills.
- \$4 million from its donor-advised fund towards re-launching Fueling Our Communities, a collaborative program with local food banks and non-profit organizations to provide free meals and groceries to thousands of Californians facing food insecurity.
- \$1 million from its donor-advised fund towards the Restaurants Care Resilience Fund to help small restaurants with improvements, upgrades, employee retention, and to manage debt, losses and rising costs.

SoCalGas has also pushed broad proactive communications with information on programs, tools and tips to manage bills and reduce gas use. Those communications are discussed in greater detail in response to Question 7.

SoCalGas and SDG&E also recommend the use of existing gas utility procurement tariff tools to assist in mitigating the impact to customers during periods of gas market price volatility. For example, amortizing Core Procurement Gas Account (CPGA) imbalances over a period of time can be a useful tool to help mitigate the impact to customers during periods of price volatility. In addition, the utilities could also explore a potential temporary cap on the Core Procurement Charge (CPC) passed through to customers in bundled core rates during price spike events, subject to subsequent recovery.

The CPC is an estimate of the wholesale natural gas market's monthly commodity cost of gas which is placed in rates for residential and non-residential bundled core customers. As described in SoCalGas's G-CP Tariff, components of the monthly CPC include the following: (1) the weighted average estimated cost of gas (WACOG) for the current month including reservation charges associated with interstate pipeline capacity contracts entered into by SoCalGas, and the carrying cost of storage inventory; (2) authorized franchise fees and uncollectible expenses; (3) authorized core brokerage fee; (4) any adjustments for over or under

collection imbalance in the CPGA imbalance band;⁶⁵ (5) backbone transportation service charges; and (6) an adjustment for the Gas Cost Incentive Mechanism (GCIM) reward/penalty.⁶⁶

In D.96-08-037, the Commission provided that the dynamism of the natural gas markets, combined with the traditional ratemaking method for bundled core gas rates (setting an effective rate for a two-year period as part of SoCalGas's Biennial Cost Allocation Proceeding (BCAP)), resulted in differences between the spot market price of natural gas and what consumers were paying month to month.⁶⁷ The Commission also provided that it was appropriate to bring rates more closely into alignment with changes in underlying market costs to improve price signals for consumers.⁶⁸ Accordingly, D.96-08-037 authorized the adoption of tariff Schedule G-CP and modified the timing of gas price forecasts from every two years to monthly.⁶⁹

In D.98-07-068, the Commission authorized modifications to the calculation of SoCalGas's forecasted portfolio WACOG using best estimates of the weighted volumes and prices of flowing supplies from the different supply basins delivered to the California Border for purposes of setting the CPC, approval to file the G-CP Tariff on the last business day of the month to become effective on the first calendar day of the following month, and established a CPGA imbalance band of +/-1% of the actual annual commodity gas purchases for the preceding 12-month period ending March 31 of each year, wherein adjustments would be made to the monthly CPC only if the CPGA imbalance falls outside of the band.⁷⁰

⁶⁵ The CPGA component is an adder in the case of an under-collection and a subtractor in the case of an over-collection.

⁶⁶ SoCalGas Tariff Schedule No. G-CP, Core Procurement Service, at Sheet 1, available at: https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-SCHEDS_G-CP.pdf.

⁶⁷ D.96-08-037 at 4.

⁶⁸ *Id.* at 6.

⁶⁹ *Id.* at 10, OP 1.

⁷⁰ D.98-07-068 at 3, OP 1-3.

Pursuant to D.98-07-068, upon exceeding the +/-1% of actual annual commodity costs imbalance (tolerance) band, SoCalGas places into future rates (amortizes) a component of CPGA over or under-collection imbalance. A CPGA over-or -under collection imbalance represents the difference at the end of each month between forecasted and estimated gas costs placed into rates and recovered from customers versus SoCalGas's actual procurement costs from purchasing natural gas. An under-collection results when forecasted gas costs are lower than actual gas procurement costs and conversely, an over collection results when forecasted gas costs are higher than actual gas procurement costs.

SoCalGas and SDG&E recommend the use of existing gas utility procurement tariff tools, such as amortization, to assist in mitigating the impact to customers during periods of gas market price volatility. For example, amortizing CPGA imbalances over a period of time may help mitigate the impact to customers. In addition, deferring the amortization to periods of less price volatility would avoid adding additional costs during higher prices. The utilities could also explore a potential temporary cap on the CPC cost passed through to customers in bundled core rates during price spike events. Evaluating and defining a potential temporary cap would include defining relevant parameters (e.g., "price spike event"), determining which pricing locations should be considered (e.g., individual trading points, regional markets, etc.), developing a mechanism for utilities to collect the costs exceeding the CPC cap that were not collected during the price spike event, and analyzing the extent to which a potential temporary price cap might mute price signals that could potentially reduce consumption.

Another way to mitigate the impact of high customers' bills, once it is understood that gas procurement rates will be unusually high, is for the utilities to proactively offer their levelized payment plan which may include qualifying arrearages. In addition, payment plan

offerings could be proactively offered to extend a payment due date, or to make installment payments over several months. For example, if a customer's bill exceeds a pre-defined threshold, the utilities could offer an easy way to spread payment of that one high bill over several subsequent months. Any actions taken by the Commission related to the recommendations in this question should not impair the utilities' financial health and obligations.

In addition, D.21-10-012 directed utilities to commence marketing, education, outreach, and enrollment for the Percentage of Income Payment Plan (PIPP) pilot within 45 days of the approval of the PIPP advice letters filed.⁷¹ Based on the date of Resolution E-5200, which approved IOUs' advice letters, marketing, education, and outreach (ME&O) began on January 30th, 2023. Though the PIPP outreach efforts began after the high bill period had mostly passed, there is an opportunity to utilize future PIPP outreach to mitigate high gas prices for eligible customers⁷² prior to the next winter season. The PIPP Pilot sets the target enrollment level at 50% of the pilot participation cap effective six months after enrollment begins. D.21-10-012 set an overall pilot size of 15,000 customers, with SoCalGas and SDG&E having a participation cap of 5,000 and 1,000, respectively.⁷³ As such, SoCalGas and SDG&E must enroll 2,500 and 500 customers, respectively, in PIPP by the end of July. Should there be remaining availability in the Pilot prior to the winter months, future phases of outreach can be tailored towards eligible customers with previously high bills, or those residing in climate zones most impacted by high bills during peak heating months. Leveraging an existing program such as PIPP is a quick and

⁷¹ D.21-10-012 at 38.

⁷² *See Id.* at 24-25 (PIPP enrollment is limited to customers who are enrolled in the California Alternate Rates for Energy (CARE) program and who either (i) are located in one of the zip codes with the highest rates of recurring disconnections prior to the disconnections moratorium, or (ii) have been disconnected 2 or more times during the 12 months prior to the disconnections moratorium.)

⁷³ *Id.* at 14.

feasible option to mitigate high bills for eligible customers given that system changes to automate billing have been implemented, and cost recovery has already been established.

5. Is there any information that the CPUC should collect or examine to further understand market dynamics?

The Commission should examine market events outside of California, including eastern US, Canada, the situation in Ukraine, and U.S. producing basins. High prices were not limited to California. Indeed, elevated prices were experienced in the production basins of Canada and the Rockies, which are sources of considerable volumes relied upon by California consumers. Mark Pocta of the Commission’s Public Advocates Office highlighted the unusualness of the price spikes in the producing regions: “.... a little bit different observation here is ... in the past just the price for almost at the border. But we really never experienced them to the extent in the producing regions.”⁷⁴ Elevated natural gas prices were also observed globally. The natural gas market is a national (and increasingly even global) market. To fully understand the market dynamics this winter, it is important to examine what occurred outside of California.

6. Are there any gas and electric market interactions that affect costs to consumer that the CPUC should examine and/or investigate?

The Commission should collaborate with relevant stakeholders to further understand the implications of decarbonization and extreme weather events on natural gas markets and prices. As extreme weather events and decarbonization policies influence electric resource portfolios and electric system reliability needs, a more holistic view of integrated energy planning and analysis is needed going forward as the energy transition changes the way we produce, deliver and consume energy, and its corresponding impact on energy markets. SoCalGas recommends

⁷⁴ CPUC, *En Banc, Current Gas Market Conditions & Impacts of Gas Prices on Electricity Markets*, February 7, 2023, Cal Advocates Presentation by Marc Pocta, at 1:02:06-1:02:20, recording available at: https://www.adminmonitor.com/ca/cpuc/en_banc/20230207/.

the Commission coordinate with relevant stakeholders to review Electric Generation (EG) gas demand in the west, how that demand was met during this period, whether it is transient or systemic in nature, and whether it contributed to price volatility in the Rockies and other western delivery points. In addition, the Commission should explore whether elevated EG consumption of natural gas impacted the supply/demand balance for the Southern California system (e.g., how reduction of CAISO imports may have impacted gas demand on the SoCalGas system by increasing reliance on in-state natural gas fired EGs).

Extreme weather events result in elevated natural gas demand by EGs. For example, the extreme weather event in the Summer of 2022 presented California grid operators the challenge of meeting unprecedented record demand. On September 6, 2022, record peak demand hit ~52,000 MW for the CAISO service territory with natural gas generation contributing roughly half of supply to meet gross peak demand.⁷⁵ Natural gas proved essential because of its flexibility in meeting demand that cannot be met with renewables. Important long-term trends in California energy markets, their relationship to cost allocation and rate design for natural gas in California, specifically the relationship between natural gas generation and core customers (mainly residential and commercial buildings) and how this relationship is anticipated to evolve as part of the energy transition and impact affordability is discussed at length in SoCalGas's testimony in its pending Cost Allocation Proceeding.⁷⁶ As the testimony outlines, natural gas generation continues to be a major customer segment on the natural gas system, accounting for around 28% of overall SoCalGas system throughput forecast underlying 2022 rates, while only

⁷⁵ CAISO, *Summer Market Performance Report*, September 2022, at 139
<http://www.caiso.com/Documents/SummerMarketPerformanceReportforSeptember2022.pdf>

⁷⁶ See A.22-09-015, Chapter 14, Prepared Direct Testimony of N. Jonathan Peress on Behalf of Southern California Gas Company and San Diego Gas & Electric Company, Long-Term Policy and Energy Transition.

contributing around 3% of SoCalGas’s revenue requirement in the same period.⁷⁷ Core customers account for around 39% of overall SoCalGas system throughput and contribute around 82% of SoCalGas’s revenue requirement.⁷⁸ Advancing rate design and cost allocation strategies is paramount to ensure equitable and affordable outcomes as the state transitions to a net zero economy. While the substance of these issues is scoped into the cost allocation proceeding as well as the gas system OIR, an understanding of the market dynamics and how decarbonization policies impact traditional ratemaking and cost allocation and ultimately market design are relevant to the issues and line of inquiry raised in this OII.

And while natural gas generators have always been a major customer demand on the SoCalGas system, as the electric grid integrates greater levels of intermittent renewables, natural gas generators are needed to provide critical load following and system flexibility, and thus their demand profile has become more volatile and less predictable, presenting challenges for natural gas utilities. However, at the same time that levels of intermittent renewable energy are increasing, natural gas generation capacity is decreasing. The Commission should consider how this impacts pricing and affordability. For example, by 2021 in-state renewable capacity increased 20% since 2017 and tripled relative to 2006 levels, while in state natural gas generation capacity has fallen ~20% since reaching its highest capacity in 2014.⁷⁹ And while gas imports on September 6, 2022 were a key contributor in maintaining grid reliability providing approximately 10% of the CAISO’s peak load, increasing decarbonization targets adopted by

⁷⁷ *Id.* at 5.

⁷⁸ *Ibid.*

⁷⁹ CEC, *Electric Generation Capacity and Energy, In-State Electric Generation by Fuel Type (GWh)* (data based on CEC-1304 QFER Database as of May 11, 2021), available at: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-generation-capacity-and-energy>

western states may further constrain the future availability of natural gas resources, which are vital for providing critical load following and system balancing particularly when renewables are experiencing diminished output and/or are unavailable. 2022 Southern California Edison (SCE) Day-Ahead prices, load, and renewable outputs reveal that price spikes occur on high demand days during evening ramp when the sun is setting, implying that California has insufficient dispatchable resources. During extreme weather event days, the morning spike and mid-day dip are overshadowed by prices as high as \$1,344/MW or 13.4 cents/kwh in the evening.⁸⁰ Occurrences of scarcity pricing are likely to increase in frequency as western states decarbonize and more natural gas generators retire.

Decarbonization policies will exacerbate this challenge as greater parts of the economy electrify. Over time, depending on the degree of fuel substitution that occurs, the winter natural gas-fired EG load could become a proportionately larger contributor to peak gas system design conditions – and may even become the largest contributing segment. Indeed, the CARB’s 2022 Scoping Plan retains the existing natural gas capacity to meet reliability needs out through 2045, as well as adding 9GW of dedicated hydrogen thermal generation to provide the operational attributes necessary to address system balancing needs.⁸¹ This modeling result acknowledges the need for operational flexibility of a just in time fuel source that becomes more important as electric load increases and intermittent resources make up a larger share of the resource portfolio. Without adequate firm dispatchable generation both in state and regionally, scarcity pricing for

⁸⁰ CAISO, OASIS Locational Marginal Prices for SCE DLAP, available at: <http://oasis.caiso.com/mrioasis/logon.do>.

⁸¹ CARB, *Final 2022 Scoping Plan Update and Appendices*, November 16, 2022, AB 32 GHG Inventory Sectors Modeling Data Spreadsheet, available at: <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx> and <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>.

dispatchable natural gas generation will continue to present affordability challenges for an economy that increasingly relies on electrification. The relationship between gas generation resource availability both near-term and long-term and the resulting pricing impacts should be further examined to ensure affordability as we make progress towards our decarbonization goals.

The Commission should also examine the current misalignment between the CAISO Day-Ahead market and the natural gas procurement cycles. Gas nominations are performed before Electric Generators know what their gas obligations are. This can result in OFO non-compliance charges (or potential non-compliance charges) to be captured in bid costs which will impact electric prices. Better alignment between the two markets would help with the uncertainty that we have today.

7. What were the utility communications to customers about the high gas prices, and what changes, if any, should be made in the future?

SoCalGas Response

a. Winter 2022-2023 customer communications and outreach.⁸²

With customers facing higher than average bills due to higher natural gas commodity prices throughout 2022, proactive high bill customer communications⁸³ ran across various channels with messages acknowledging higher gas prices, offering ways SoCalGas can help with either energy efficiency, income qualified assistance programs, and tools such as our *Ways to Save* and *Bill Tracker Alerts*, to manage usage and bills through winter months and cooler

⁸² See Attachment A for a compilation of SoCalGas’s winter 2022-2023 customer communications and outreach.

⁸³ Historically SoCalGas has developed annual strategic winter customer communications in preparation for our “high bill season” (November through March). Primary messages have included, but not been limited to, natural gas conservation, energy savings tips, appliance safety, and customer assistance programs.

temperatures. Based on SoCalGas's research and industry survey soliciting customer feedback,⁸⁴ SoCalGas designed its Winter 2022- 2023 high bills communications campaign to focus on proactive, supportive, and multi-language (English and Spanish) messages. The specific objectives of SoCalGas's communications campaign included: 1) helping customers plan and prepare for higher winter bills and drive awareness around gas price volatility, 2) driving awareness of tips, tools, programs, and services to support the variety of customer needs, and 3) providing information related to energy savings, safety, and conservation solutions for natural gas.

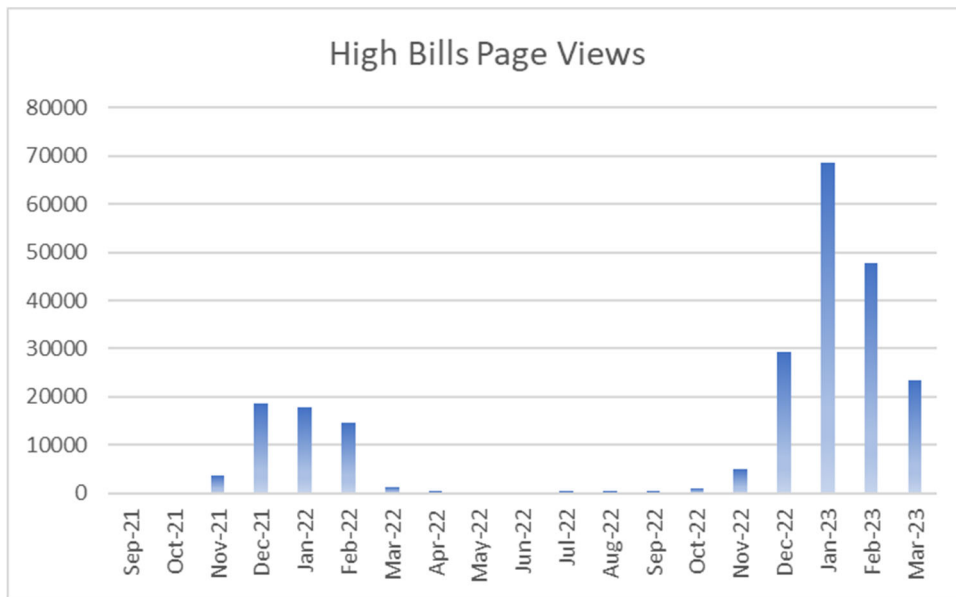
In support of these objectives, SoCalGas used a variety of communication channels (beginning in September 2022 and continuing through March 2023) including but not limited to: [socalgas.com](https://www.socalgas.com), printed on-bill messages, Interactive Voice Response (IVR), My Account, chatbot, Amazon Alexa, non-bill emails, social media, stakeholder outreach. These channels were utilized to reach a majority of customers through the various touchpoints in both English and Spanish as applicable, and provided relevant messages regarding gas price forecasts, and ways in which SoCalGas could help customers manage usage and bills through energy conservation, assistance programs, bill payment options, and tools such as our Ways to Save application,

⁸⁴ In July 2022, SoCalGas conducted qualitative research consisting of six virtual focus groups to gather feedback from geographically diverse customers experiencing higher than typical natural gas bills due to commodity costs that could help inform our winter messaging campaign. Specific objectives included: 1) understanding customer awareness and perceptions around rising commodity costs, 2) obtain feedback on messaging and outreach, 3) identify areas of confusion, and 4) generate suggestions for improvement. The six sessions consisted of the following customer segments: two sessions with Residential Customers (one each in English and Spanish); two sessions with Low-Income Residential Customers (one each in English and Spanish); and two sessions with Small Business Customers (conducted in English). In addition to the direct customer research, as a member of American Gas Association (AGA), SoCalGas pursued an opportunity for a member survey to gain additional insights regarding planned messages or communications to customers about high commodity costs for natural gas, the channels that were being utilized, and how far into the future our expectations are being communicated regarding commodity prices.

which provides customized recommendations to help lower energy usage, and Bill Tracker Alerts, which help customers monitor consumption and view projected charges on upcoming bills.

- Website*—SoCalGas has maintained and updated a resource webpage at socialgas.com/ManageHigherBills with information regarding how SoCalGas can help residential, income qualified and small business customers manage higher bills. It also provides information regarding the factors leading to higher bills, current and historical monthly natural gas prices, bill details, energy savings tools and programs to help manage monthly bills. SoCalGas has seen significant increases in website visits and engagement compared to winter 2021-2022. Specifically, when compared to January 2022 to January 15, 2023, roughly 63% of the visitors to this webpage were new visitors. In addition, we can see that consistently the top five engagement topics are 1) Level Pay Plan, 2) Programs & Services, 3) Log in/Register MyAccount, 4) Energy Savings Tips/Tools, and 5) Assistance Programs.

Figure 9



(Data as of March 2023)

- Pop-up ads*—In addition, website promotions on the socialgas.com homepage were run through pop-up digital ads in January and February 2023 to provide additional awareness to any visitor to the homepage during the run times and linked back to the resource page

mentioned above. Key messaging in January was higher gas prices and in February the focus was on understanding bills.

- *Emails*—Non-bill related direct customer emails were sent in the months of December 2022 and January 2023 reaching roughly 4.1 million customers per email deployment, per residential, CARE and small business customers from December 2022 – January 2023. The December email focused on winter preparation, providing customers awareness of expected higher bills due to price of natural gas and expected transportation rate increase. Accompanying these key messages, SoCalGas offered tips to save on energy use, customer assistance programs, bill payment options, and tools to help manage usage into the winter season. The January email also provide the same helpful energy savings tips, program, and services to help manage bills, but followed a focus on the transparent message regarding the unprecedented colder weather, leading to increase usage and expectations of “much higher than expected” natural gas prices and the impact on customer bills.
- *Interactive Voice Response (IVR)*—Through our customer contact center IVR system, SoCalGas placed messages following prompts for billing inquiries regarding the natural gas prices and again offering way to help with assistance programs and bill payment options. These messages were launched as early as the end of September 2022 and continued to be maintained and updated as relevant to address the customers’ needs based on calls with Customer Service Representatives (CSRs) and foreseen impacts as necessary.
- *MyAccount*—From Dec 2022 – March 2023 the SoCalGas My Account system was visited by roughly 3.4 million customers per month, with 97% of them residential and 3% business customers. Within the My Account Dashboard, messages are placed periodically to inform customers of important system or service updates and opportunities. My Account is available to residential and business customers, and both are served as part of the overall communications strategy to share key information regarding expected higher gas prices, billing resources, and programs.
- *Social Media*—The social media strategy consisted of a minimum of weekly postings in alignment with winter preparations, conservation messages, assistance programs and billing payment options or tools to help manage usage. Planned communications started September 2022 - March 2023 and ran on the SoCalGas Facebook, Instagram, and/or Twitter handles as relevant. Topics included energy saving/conservation tips, assistance programs, weather triggered tips, climate credit, and our debut of a social media winter conservation series titled “Dan The Weatherman”.
- *Media* – Planned media and public information was guided by the utilization of the SoCalGas [Newsroom](https://newsroom.socalgas.com) (newsroom.socalgas.com) blog stories and proactive Press Releases. Since the end of December 2022 to March 2023, four blog stories were posted and provided updates and information on higher natural gas prices including, third party sourced validation regarding contributing sources for higher natural gas prices across the west coast, details on gas market volatility, updates on monthly gas prices for months of February and March, along with all resources for billing support, payment options, and

energy conservation to help customer manage bills. Additionally, since November 2022 at least five press releases have been sent via PR Newswire and providing community outreach ahead of winter, expected customer bill impacts, contributing factors for higher natural gas market prices, and significant SoCalGas contributions to provide additional financial relief to our most vulnerable and income qualified customers.

Aside from the general public communications, targeted communications were provided to maximize awareness of higher gas price impacts across specific customer segments. These communications had been developed and targeted specifically to these customer segments:

- *High Bill Investigation (HBI) Customers*—Historically, SoCalGas has conducted an annual email-based communications campaign at the start of winter (Dec/Jan - weather pending) providing energy savings tips, programs, and services to help manage energy use and bills during the winter and colder weather months. This campaign targeted customers from the prior season who had been issued a “high bill investigation” service order requiring a service technician to inspect the customers appliances for any natural gas leaks or abnormal usage that might have resulted in the high bill. In November 2022, SoCalGas initiated an early deployment of this email campaign and expanded the targeted list to include customers who called our customer contact center about (HBI) and those who received a follow up letter from a Customer Service Representative (CSR). This strategy allowed the targeted customer list to expand by nearly 40% and reached roughly 65,000 customers by the end of November in doing so.
- *Income Qualified Customers*—Customers eligible for subsidized or low-cost services due to certain qualifications receive text (SMS) messages based on assumed consent. These customers receive CARE program messages in effort to continue to raise awareness and encourage participation in the income qualified program. These communications are divided into three groups: 1) new customers, 2) existing customers not enrolled in CARE, and 3) customers eligible to recertify for the program to continue to receive the 20% monthly bill discount. This channel and was leveraged to bring awareness to potentially vulnerable customers of higher expected bills due to increases in natural gas prices while also offering a direct assistance program to help manage bills.

In addition, in October and November of 2022, SoCalGas partnered with local organizations to share important resources and provide 500 Google Nest thermostats in preparation for winter. Organizations included Southeast Community Development Corporation, Alma Family Services, and All Peoples Community Center. Media coverage consisted of English, Spanish and Asian media including, KNBC (NBC), KTLA, KVEA (Telemundo 52),

KMEX (Univision), NTDTV (New Tang Dynasty Television), and PR NEWSWIRE: KYLA, KRON4, FOX5.

SoCalGas also maintains strong community partnerships and engagement throughout our service territory. At the start of 2023, SoCalGas accelerated its outreach efforts through Regional Public Affairs, Account Representatives, and third-party contracts. SoCalGas also engaged foodservice organizations, restaurant associations, trade professionals, and community-based organizations (CBOs). Through these connections SoCalGas contacted over 50 organizations/associations with critical awareness and factors leading to higher natural gas prices and bill impacts. Higher gas prices also impacted our natural gas vehicle (NGV) fueling stations and clean transportation customers. Communications were not only posted directly at the NGV fueling stations but, through the SoCalGas clean transportation team, we had reached roughly 325 clean natural gas (CNG) customers and third-party contractors.

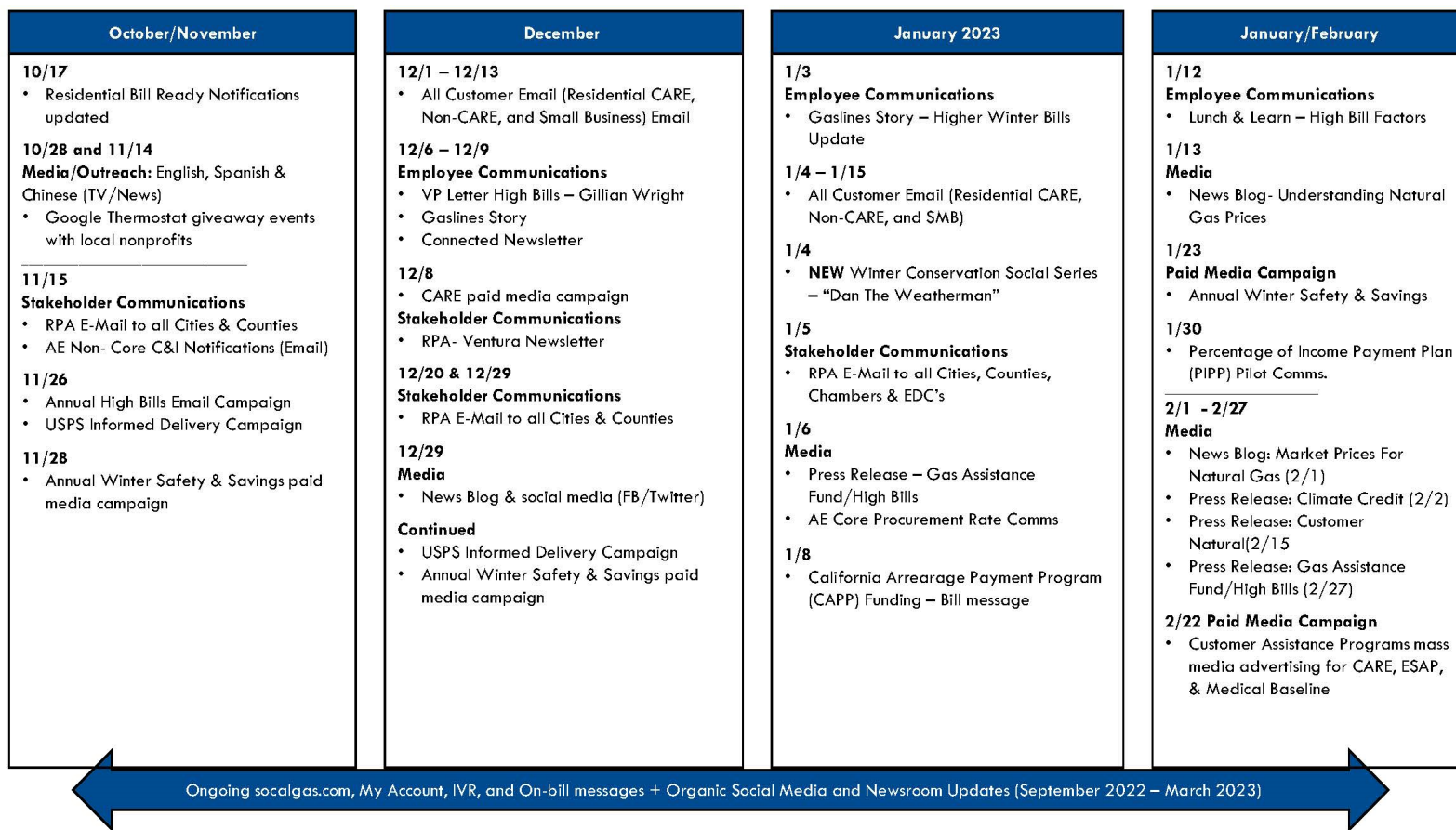
Communications with public officials was another key component of SoCalGas's customer and stakeholder outreach strategy. SoCalGas issued communications to all 223 municipalities and 12 counties within the SoCalGas service territory. This included communications to mayors, city councils, supervisors, city managers, etc. Communications through direct calls and in person presentations at city council meetings have continued to provide community awareness, resources and updates on natural gas prices and ways SoCalGas can help our customers. SoCalGas has supported various cities convening special informational sessions related to gas prices by providing subject matter experts from its gas acquisition, customer service and public affairs groups to provide resources and information needed to aid in the public communications. In addition, SoCalGas coordinated and conducted Commission staff briefings to various staff members throughout January. The briefings were attended by experts

from SoCalGas's gas acquisition, customer service, and public communications departments. SoCalGas provided information regarding market volatility for western gas prices leading into January, historical winter gas demand, SoCalGas winter storage levels, customer service trends and impacts as well as an overview of its customer communication and outreach efforts. Lastly, SoCalGas participated in a special legislative staff update regarding winter gas prices on February 9, 2023. Over 90 people attended this event, with representatives from 30 Assembly offices, 20 Senate offices, and three different committees.

Figure 10 provides a timeline of SoCalGas's communications and outreach efforts.

Figure 10

Timeline



b. Options for future additional customer communications and outreach.

SoCalGas appreciates the opportunity to provide comments regarding future communications to customers about high gas prices. In the near term, SoCalGas is planning additional customer communications by expanding text (SMS) message options for high natural gas price alerts to customers that opt-in, as means to provide additional awareness to support customers with energy and bill management during the winter season. Additional options for future customer communications include:

- Expanding customer feedback and qualitative research to include additional participants and customer segments to gain further insights on messaging, channels, and other tools.
- Enhancing presentation and organization of digital communications (e.g., socialgas.com, educational videos, and social media) to provide helpful information to customers across various customer segments.
- Dedicated promotional communications regarding SoCalGas's Bill Tracker Alert to encourage early adoption, including use of direct communication channels, social media, and leveraging cross promotional communications where applicable.

SDG&E Response

a. Winter 2022-2023 customer communications and outreach.⁸⁵

Beginning last October, SDG&E has been executing a broad, multi-channel, customer education and engagement campaign to be transparent, drive awareness and offer assistance. SDG&E launched a comprehensive, integrated communications campaign starting in October 2022 to prepare customers for potentially high winter bills, which continued through Q1 2023. A variety of tactics – including press releases, media interviews, direct emails to customers, organic and paid social media posts, digital and print ads, multi-lingual fliers, new and revamped web

⁸⁵ See Attachment B for a compilation of SDG&E's winter 2022-2023 customer communications and outreach.

content – were used to disseminate relevant and useful information to customers, broadcast, online and print media, local community leaders (including elected officials and municipal staff), and community-based organizations (CBOs). Using plain and straightforward language, SDG&E informed customers about the unprecedented natural gas commodity market volatility, what they can do to save on their gas heating bill, and what assistance programs are available to help them if they are struggling to pay their bill. Support included:

- *Dedicated Leadership Strike-team:* SDG&E’s cross-functional “strike-team” featured leaders across several departments who executed a comprehensive and thoughtful plan to drive awareness of gas rates, deliver a multi-pronged communications and media campaign, provide ongoing support and follow-up directly on all escalated customer complaints. This team met weekly throughout Q1 to ensure customers with complaints were provided with options including payment arrangements, the federal Low Income Home Energy Assistance Program (LIHEAP), which provides hundreds of dollars to customers to pay for energy bills and weatherization measures, Neighbor to Neighbor (N2N), which is SDG&E’s shareholder funded program to help customers pay overdue bills, as well as enrollment in California Alternative Rates for Energy (CARE) and the Family Electric Rate Assistance (FERA) programs, which reduce customers’ bills.
- *Paid Advertising:* SDG&E began programmatic digital advertising on October 24, 2022 which promoted winter-specific savings tips to help manage their gas and electric bills. The ads connected customers to [sdge.com/MyEnergy](https://www.sdge.com/MyEnergy) to learn more about bill and energy management resources like Energy Alerts and Level Pay program, gas-specific tips, and available assistance programs. On January 2, 2023, additional advertisement messages ran specifically focused on alerting customers to higher natural gas pricing and bills. Figure 11 outlines the timeline for advertising per channel, including the customer emails.

Figure 11

Seasonal Rate Education - Winter		October					November				December				Jan-23				Feb-23			
Broadcast Week	10/3	10/10	10/17	10/24	10/31	11/7	11/14	11/21	11/28	12/5	12/12	12/19	12/26	1/2	1/9	1/16	1/23	1/30	2/6	2/13	2/20	2/27
Week Number	41	42	43	44	45	46	47	48	49	50	51	52	52	1	2	3	4	5	6			
STREAMING VIDEO AD																						
WINTER DIGITAL ADS																						
WINTER PAID SEARCH																						
WINTER PAID SOCIAL																						
GAS DIGITAL ADS																						
GAS PAID SEARCH																						
GAS PAID SOCIAL																						
EMAILS																						

As part of its paid media campaign, SDG&E began programmatic digital advertising on October 24, 2022, which promoted winter-specific savings tips to help manage their gas and electric bills. The ads connected customers to sdge.com/MyEnergy to learn more about bill and energy management resources like Energy Alerts and Level Pay program, gas-specific tips, and available assistance programs. On January 2, 2023, additional advertisement messages ran specifically focused on alerting customers to higher natural gas pricing and bills. As part of the campaign:

- *Emails:* SDG&E also delivered 6.8 million emails, with higher than usual open rates, tailored for residential and business customers to help them plan and prepare for higher winter bills. Additionally, SDG&E leveraged monthly energy bill forecast/usage alerts for all customers who have provided e-mail contact information.
- *Social Media:* The social media strategy consisted of a minimum of weekly postings in alignment with winter preparations, conservation messages, assistance programs and billing payment options or tools to help manage usage. Planned communications started November 2022 - April 2023 and ran on all SDG&E channels and means at its disposal to disseminate information, including Facebook, Twitter, Instagram, and Nextdoor, which resulted in retweets by the CPUC and local leaders. About 200+ social media posts were created, translated, published and shared in English and Spanish to our 1.2M+ followers.
- *Website:* SDG&E’s primary homepage graphic was updated to prominently highlight the historic natural gas market conditions as well as assistance programs. A banner message

was added to the top of every webpage. Additionally, functionality and design improvements were made to its customer assistance program landing page, sdge.com/assistance, which is a one-stop shop for customers to learn about payment plans, debt relief, bill discounts and other resources. In addition to sdge.com/MyEnergy, this landing page was heavily publicized across communications channels and materials. A page dedicated to explaining what goes into customer rates, sdge.com/rates, also saw “New Users” account for ~47% of total Pageviews in January, February, and March. The top five engagement topics on the rates page are 1) Energy Rates and Who Sets Them 2) Your SDG&E Bill and Why Rates Are Higher 3) Making Bills More Affordable 4) 2024-2027 Electric and Gas Budget Proposal 5) Valuable Benefits to Customers

- *Media:* Due to the company’s aggressive and proactive media outreach over a period of months, all local major news outlets, as well as many smaller community publications, ran or aired multiple rounds of stories on the topic throughout the peak of the commodity price spike, and then ran more stories as SDG&E communicated that commodity prices were starting to come down. Updates were also made available at its NewsCenter at sdgenews.com.
- *Interactive Voice Response (IVR)*— SDG&E placed an upfront message on our Customer Contact Center IVR to increase customer awareness of high natural gas prices.
- *Customer Contact* – SDG&E provided frequent updates and additional training to Customer Care agents including talking points, coaching, and training to answer customer questions and provide recommendations to reduce their bill to support customer understanding.
- *Collaboration with Community Based Organizations:* A key part of SDG&E’s strategy to extend the reach of its communications was through collaborations with local leaders and community-based groups, such as 2-1-1 San Diego and 2-1-1 Orange County. SDG&E created a social media toolkit, which focused on rate education and customer programs including CARE, FERA, ESA, AMP, LIHEAP and Level Pay Plan, and shared it with SDG&E’s Energy Solutions Partner Network, which consists of more than 200 CBOs. This toolkit was used to amplify messaging to customers throughout SDG&E’s service territory and provided contact and enrollment information for these programs.
- *Access and Functional Needs Support:* SDG&E conducted extensive community outreach, which included a call campaign to ~500 customers with Access and Functional Needs (AFN), who were also identified as being high natural gas users, to ensure they were aware of the gas rates, educate them on the key drivers and provide information on available programs that can help lower their usage and manage their monthly bills. SDG&E also partnered with the San Diego Food Bank to provide warming items (blankets, beanies, socks and gloves) at two food distributions, which were well attended and received positive customer feedback. SDG&E staff joined SD Food Bank and provided information on available Customer Assistance Programs and bill payment support programs. Additionally, care was taken to make sure customers with AFN received the communications either directly through SDG&E or through trusted sources, such as CBOs whose mission is to serve them. Customer communications, social media

posts, and press materials were consistently translated into Spanish, the most prevalent foreign language spoken in SDG&E's service territory. An assistance program flier was translated into other prevalent languages, in addition to Spanish.

- *Rate Education Seminars:* Additionally, SDG&E hosted rate education seminars for both large business customers and SDG&E's Energy Solutions Partner Network of CBOs. More than 100 organizations attended these sessions to learn more about the key drivers of the rate increase, SDG&E's response to further support customers, and programs available to assist customers with lowering their monthly bill.
- *Local Government Engagement:* SDG&E communicated with all municipalities in our service territory, including cities and counties, and held one-on-one briefings with elected officials to update them on the steep rise in wholesale natural gas rates. This included communications to all mayors, city councils, county supervisors and city managers. Communications included resources for customers including tips on how to save energy and available assistance, including bill payment, discount and debt relief programs. Additionally, SDG&E spoke during public city council meetings, at events, and in community forums to communicate with both community leaders and the public. We have engaged in many follow-up conversations and sent subsequent communications to elected officials to ensure all questions and concerns are addressed around gas rates, and provided regular updates as we saw changes to the market.
- *Program Enhancements and Promotion:* SDG&E heavily promoted available programs, in particular, the LIHEAP and N2N programs, as well as enhancing the N2N program. Some examples include:
 - Adding \$5M in shareholder funding to N2N program fund for a total of \$6M in funding available to customers
 - Enhancing the N2N program to make enrollment easier for customers, including enhancements listed in Table 4 below.
- *My Account:* From Dec 2022 – March 2023 the SDG&E My Account system was visited by roughly 475,000 customers per month, with 96% of them residential and 4% business customers.

Table 4

Old Program	New Program
Indirect enrollment <u>only</u> (must call 2-1-1 to obtain # of local agencies)	Customers can call SDG&E, visit a branch office or apply online, in addition to 2-1-1
Incentive capped at \$300 or \$400 for MBL	Incentive level increased to \$600 per household
Must be at least 90 days past due (disconnection notice)	Only 60 days past due (late notice)
Customers must attempt to apply for LIHEAP before applying to NTN	Any active, residential primary account eligible
Customers with remaining debt must agree to payment plan	No payment plan required
No interaction with disconnection process	NTN embedded into disconnection process through ESS

- Held⁸⁶ 9 events at SDG&E’s branch offices, resulting in more than 800 attendees and over 500 LIHEAP enrollments, in coordination with Campesinos Unidos, Inc. of San Diego (CUI) to enroll eligible customers in LIHEAP and Neighbor to Neighbor.
- SDG&E sent over 43,500 dedicated emails to customers with qualifying arrears to promote the events. Targeted by zip codes, SDG&E posted the week of each event on NextDoor.
- Partnering with CUI to attend workshops at CUI’s offices to enroll eligible customers in LIHEAP on Saturdays.
- Met with community organizations, such as the Chaldean Community Council, to ensure local access to available programs and funding.
- During Q1, SDG&E sent CARE & FERA outreach emails to potentially eligible customers, continued paid search and promoted customer assistance on social media outlets and bill messaging.
- Dedicated emails and letters were sent to 25,000 customers in arrears promoting customer assistance offerings, including NTN and LIHEAP.

⁸⁶ As of 3/30/2023.

From Dec 2022 – March 2023 the SDG&E My Account system was visited by roughly 475,000 customers per month, with 96% of them residential and 4% business customers.

b. Future communications and outreach

SDG&E continues its annual rate education to help customers plan and prepare for seasonal bills. The multi-channel approach will evolve based on the marketing effectiveness of the 2022-2023 campaign, incorporating lessons learned from customer response, key KPIs and targeted customer research. SDG&E will also continue to explore new opportunities to enhance its seasonal campaigns, including:

- Expand content marketing opportunities through video, web copy and social influencers.
- Continued promotion of Bill Alert notification enrollment and functionality, providing customers with more choices and control over bill notifications and energy usage.
- In an effort to expand time-sensitive messaging, SDG&E will continue to explore new media tactics that can be turned on and in-market quickly.

IV. CONCLUSION

SoCalGas and SDG&E appreciate the opportunity to provide these comments in response to the OII and share the Commission’s interest in protecting against the risk of future similar events and mitigating adverse price impacts on consumers.

Respectfully submitted,

/s/ Setareh

Mortazavi

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Dated: April 19, 2023

ATTACHMENT A



SoCalGas's winter 2022-2023 customer communications and outreach

ATTACHMENT A

SoCalGas 2022-2023 High Bills Communications

Emails:

1. **November/December 2022** – Email sent on 11/26/2022 to 65K customers and then retargeted to 29K customers on 12/10/2022.



Dear Customer,

Cold weather has arrived, and we are here to help you prepare with energy-saving tools, conservation tips, and assistance programs that could help you [manage your monthly bill](#), while still providing a warm and cozy environment this season.

The cost of natural gas has been higher nationwide, resulting in higher-than-average monthly natural [gas prices](#). Heating is one of the top energy expenses for most customers during colder months and can account for more than half of your total natural gas bill.


Here are a few tips to help you manage your gas usage this winter:

- Wash and rinse clothes in cold water, take shorter hot showers, and lower your water heater temperature.
- Sign up for email and text Bill Tracker Alerts through [My Account](#) to help monitor your natural gas consumption throughout your billing period.
- Complete your Energy Profile with our [Ways to Save](#) tool to get a personalized household energy analysis and savings plan to help you keep track of your energy-efficiency progress and ultimately help you lower your bills.
- Eligible customers may sign up for a [Level Pay Plan](#), which averages their annual natural gas use and costs over 12 months.

[Learn More](#)

Por favor visite nuestro [sitio web](#) para obtener información en español.

Connect with Us*



2. **December 2022** – Email sent to 4.1M residential, CARE, and small business customers combined with valid emails on file.



Prepare for the Winter Season

SoCalGas can help customers prepare for and navigate the upcoming colder weather and the potential increasing cost of energy.

During this winter season, customers may be receiving higher bills due to several factors including the cost of energy. Peak winter bills are expected to increase by 25-30%¹ compared to the 2021-2022 season. This increase is due to continued higher price of natural gas² and increases in transportation rates.

To help you manage your monthly bill this winter, we offer [energy-savings tools, programs, tips, and resources](#) that could help you save money and reduce energy use through the colder months.

Winter Outlook



Heating your home during colder temperatures could lead to more natural gas use and can account for more than half of your bill. Compared to other fuel sources, a natural gas heating system is still the most affordable and efficient way to heat your home or business.



Financial assistance is available to qualifying customers through our [customer assistance programs](#). Plus, we offer rebates on energy-efficient appliances, energy saving tips, and [bill payment options](#) that may be right for you.



To help plan your usage, you can reference [current and historical natural gas prices](#). You can also sign up for [Bill Tracker Alerts](#) to monitor your gas consumption to avoid surprises on your bill.

We offer more resources to help you understand your bill, payment options, and natural gas safety this winter.

[Learn More](#)

[Información en español](#)

3. **January 2023** – Email sent to 4.1M residential, CARE and small business customers combined with valid emails on file.



Dear Customer,

There's no easy way to put this: January bills are likely to be higher than usual. An unprecedented cold snap across the nation in part has caused natural gas market prices in the West to more than double between December and January – much higher than expected. As a result, SoCalGas residential customers can expect the typical January bill likely to be more than double the typical bill last January, assuming the same amount of natural gas is used.

Many SoCalGas employees are your neighbors and community members, and we are here to help you best manage your energy consumption, while balancing usage and comfort. To help keep monthly bills as low as possible, we offer tips, tools, and programs designed to assist you in finding what works best for your home or business.

- [Bill Tracker Alerts](#) are a great way to monitor your consumption to help gauge the amount of your next bill and enrollment is easy. Completing an energy profile through our [Ways to Save](#) online tool provides you with a personalized plan to track progress and determine the best approach to help lower your energy usage. If you would like to spread out your monthly costs, check out our [Level Pay Plan](#), which averages your natural gas usage and costs over 12 months.
- Qualifying residential customers may also be eligible for a variety of options through our [customer assistance programs](#). The CARE program offers a 20% bill discount, the Energy Savings Assistance Program offers no-cost home improvements, and customers with a qualifying medical condition may be eligible for additional natural gas at the lowest baseline rate through the Medical Baseline Allowance Program.

We offer [bill payment options](#), conservation tips, rebates, and resources to help all customers in customizing their usage and savings approach. For more information, please visit socialgas.com/ManageHigherBills.

[Información en español](#)

Respectfully,

A handwritten signature in black ink, appearing to read "John Adams".

4. January 2023 – Sample email sent to assigned commercial and industrial customers directly from Account Representatives.

Dear Customer,

SoCalGas is reaching out to inform all customers that natural gas prices are going to be even higher than usual this January due to several unprecedented factors beyond our control. Customers can expect much higher than usual natural gas prices on the West Coast.

In addition to our annual transportation rate updates (effective January 1, 2023), you will notice a significant rise in our monthly core procurement rate for January 2023. The core procurement rate is the cost of natural gas purchased by SoCalGas on behalf of its customers. Due to a rise in the market price of natural gas, customers may see a winter gas bill double or higher compared to one year ago.

The high bills are a result of historically high natural gas prices in the western United States. SoCalGas doesn't set the price for natural gas. Instead, natural gas prices are determined by national and regional markets. SoCalGas buys natural gas in those markets on behalf of residential and small business customers, and the cost of buying that gas is billed to those customers with no markup, meaning SoCalGas does not profit from gas commodity prices going up.

Natural gas prices change monthly, and you can [view current and historical prices](#) to help plan your usage.

Current and Historical Natural Gas Prices:



According to the US Energy Information Administration (EIA), [a number of factors](#) are contributing to higher natural gas commodity prices.

- Widespread, below-normal temperatures on much of the West Coast, including Washington and [Oregon](#);
- High natural gas demand for heating by customers in areas with below normal [temperatures](#);
- Reduced natural gas supplies to the West Coast from Canada and the Rocky [Mountains](#);
- Reduced interstate pipeline capacity to the West Coast because of pipeline maintenance activities in West Texas; and
- Low natural gas storage levels on the West Coast.

A detailed report about these market conditions can be found here: <https://www.eia.gov/naturalgas/weekly/>.

In short, this combination of factors means that demand for natural gas on the West Coast is unusually high [at the same time that supplies are reduced](#). These conditions could continue through the winter months.

Our focus is always on safe, reliable, and affordable natural gas service to our customers, and we are very empathetic to the real impact higher bills can have. We are alerting you so that together we can manage and mitigate impact.

SoCalGas offers many accessible [tools to help you cut down on energy](#) usage and help lower your bills amidst the rising costs. Please do not hesitate to contact me to discuss how to reduce energy use by installing energy-efficient equipment, review SoCalGas' rate tariffs to find one that best fits your needs for cost and reliability, and/or answer questions you may have about your natural gas bill.

Sincerely,
SAE Name
Phone
Email

5. **February 2023** – Clean Fuels customer email sent to assigned customers and contractors directly from Account Representatives.



February 1, 2023

Dear Customer:

Natural gas prices continue to remain higher than average in the month of February.

Prices at SoCalGas public-access compressed natural gas stations will range from **\$XX-\$XX** in February.

We understand that higher fuel and energy costs can be burdensome for you and your business. SoCalGas works diligently to secure the best possible prices for the natural gas we purchase on our customers' behalf, but the market price of natural gas remains high.

[Click here](#) to view our current transportation rate schedule. For more information on natural gas prices and predictions, visit <https://www.eia.gov/naturalgas/weekly/>

If you have any questions, you can always contact me at **(phone) and (email)**.

Sincerely,

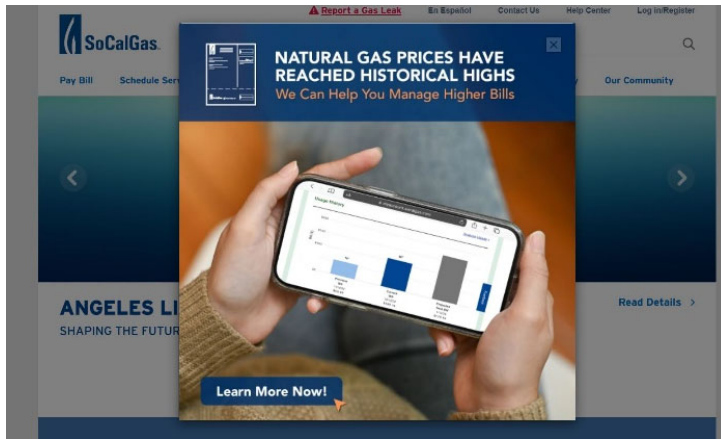
SAE Name
Phone
Email

SoCalGas.com Homepage Marquee:

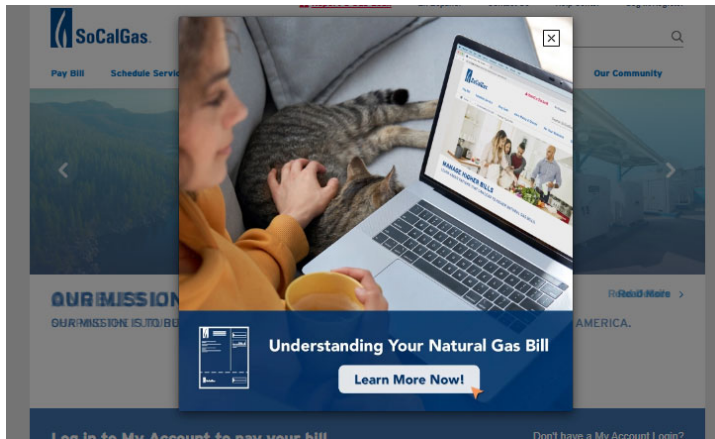
The screenshot shows the top navigation bar of the SoCalGas website. It includes the SoCalGas logo on the left, and links for "Report a Gas Leak", "En Español", "Contact Us", "Help Center", and "Log in/Register" on the right. Below the navigation is a search bar labeled "Search SoCalGas". A horizontal menu contains links for "Pay Bill", "Schedule Service", "Stay Safe", "Save Money & Energy", "For Your Business", "Sustainability", and "Our Community". The main content area features a large image of a family in a kitchen. Below the image is a marquee with the heading "MANAGE HIGHER BILLS" and the subtext "LEARN ABOUT FACTORS THAT CAN LEAD TO HIGHER NATURAL GAS BILLS AND HOW WE CAN HELP". A "Learn More >" link is positioned to the right of the subtext. At the bottom of the marquee are four blue circular indicators, with the first one filled.

Homepage Pop-up Ads:

January homepage pop-up:



February homepage pop-up:



Web - socalgas.com/ManageHigherBills:

Beginning Fall 2022, all customer communications and messages encouraged audiences to visit socalgas.com/ManageHigherBills to for energy savings tips, tools, factors leading to higher bills and ways SoCalGas can help with assistance programs and bill management services. The page was updated as needed with relevant information and houses graphical depiction of gas prices month over month along with other billing details. Sample image of main landing page:



MANAGE HIGHER BILLS

LEARN ABOUT FACTORS THAT CAN LEAD TO HIGHER NATURAL GAS BILLS.

Natural gas prices have reached unprecedented levels on the West Coast. SoCalGas continues to diligently work to secure cost-effective natural gas supplies on behalf of our residential and small business customers. The price of natural gas is determined by broader regional, national, and global markets and is passed on directly to our customers without markup. SoCalGas does not profit from the movement of gas commodity prices. We are here to help our customers **understand their bill** while preparing for the colder weather and increasing cost of energy. Visit our [SoCalGas Newsroom](#) for the latest stories and announcements.

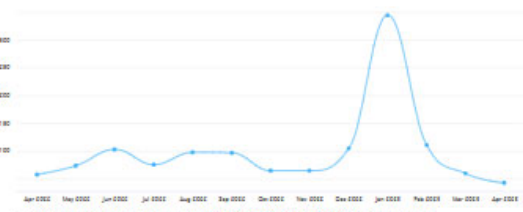
How We Can Help

- We offer [energy-saving tools, program tips, and services](#) to help our customers save money, use less energy, and lower their monthly bills year-round.
- If you need financial assistance, we offer a wide range of [programs and services](#) that may help you save money on your natural gas bill.
- Residential and small business customers may also qualify for [COVID-19](#) support or assistance.
- Sign up for email and text Bill Tracker Alerts through [My Account](#) to help monitor your natural gas consumption throughout the billing period.
- Eligible customers may sign up for a [Level Pay Plan](#), which averages their annual natural gas use and costs over 12 months. Customers then pay an average bill amount each month instead of actual charges.

What Could Be Causing My SoCalGas Bill to Be Higher?

- Factors that could impact your bill include the cost of natural gas, weather, an increase in your appliance usage, your billing cycle, and past due bills. [Learn more.](#)
- The cost of natural gas has been higher nationwide, resulting in higher-than-average monthly natural gas prices.
- The price of natural gas is determined by regional and national markets and passed on directly to our customers. We do not set the cost of natural gas and do not earn additional profits from higher supply prices.
- SoCalGas is committed to delivering affordable natural gas to our customers. We continue to use a suite of tools to secure the best prices for the natural gas we purchase.
- New gas transportation [rates](#), approved by the CPUC, went into effect on January 1, 2023. Residential average transportation rates increased by about 5%, and small business transportation rate increased by about 5% on average. These transportation rate changes will allow us to continue upgrading our infrastructure, retain responsible, well-trained employees, and support the growth of diverse energy options.

Current and Historical Natural Gas Prices:



Understanding Your Bill

We are all looking for ways to save time and energy and reduce expenses. [Understanding your monthly SoCalGas bill can help.](#)

What is the California Climate Credit?

This month your natural gas bill will include a credit of \$30.77 identified as the "California Climate Credit." Your household and millions of others throughout the state will receive this credit on your utility bill. If you are also a customer of Southern California Edison, San Diego Gas & Electric, or Pacific Gas & Electric you will receive an additional credit from them. According to the California Public Utilities Commission, your combined credit on your gas and electric bills can range from \$40 to \$150.

The California Climate Credit is part of California's efforts to fight climate change. This credit is from a state program that requires power plants, natural gas producers, and other large industries that emit greenhouse gases to buy carbon pollution permits. The credit on your bill is your share of the payments from the State's program.

The Climate Credit is one of many programs resulting from landmark legislation called the Global Warming Solutions Act of 2006. Together, these programs are cutting pollution, creating jobs, and investing in cleaner energy and transportation.

Your Climate Credit is designed to help you join in these efforts. For more information about the Climate Credit, visit [www.cpuc.ca.gov/climatecredit](#). For more information about climate change science and programs to reduce carbon pollution, visit [www.climateaction.ca.gov](#).

What Charges Make Up My SoCalGas Bill?

Our rates are regulated and approved by the California Public Utilities Commission (CPUC). Natural gas bills consist of three cost components:

1. **Natural Gas Commodity Charge** – The cost of natural gas purchased by SoCalGas on behalf of its customers.
2. **Natural Gas Transportation Rates** – The cost to deliver natural gas to a customer's home or business.
3. **Public Purpose Surcharge** – A CPUC mandated charge to fund public purpose programs such as California Alternate Rates for Energy (CARE), the Energy Savings Assistance Program, energy efficiency, and research.

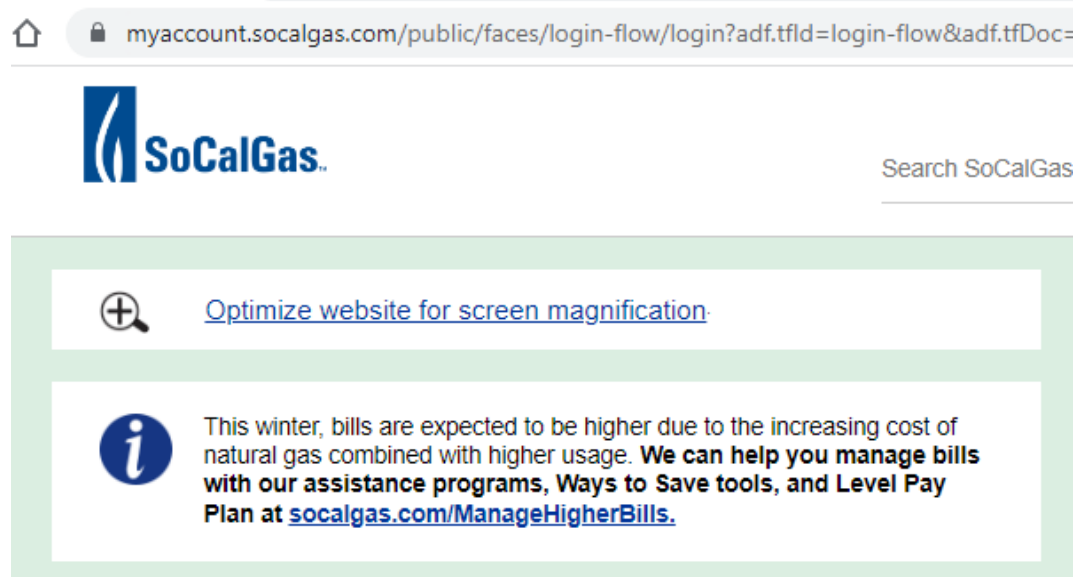
Rates and fees vary depending on customer location and applicable regulations.

[Learn more](#) about how these charges are reflected on your bill.



My Account (Residential and Business):

When customers logged into SoCalGas My Account to see their personalized energy information, a message about winter pricing was posted to make customers aware of higher prices and emphasize that assistance was available.



IVR (Interactive Voice Response) On Hold Messaging for Customer Contact Center:

Messages on IVR have been running since early Fall 2022 and have been updated as necessary to provide the most current information to customers. Below is a sample of these messages in English and Spanish. In January and February, the on-hold message was also updated to provide customers with information about natural gas bills and available resources prior to connecting with a Customer Service Representative.

<p>IVR Message</p>	<p>Completed (updated week of 11/28 to current message)</p>	<p><u>English:</u> Colder weather has arrived and you may notice a higher gas bill. This season, higher bills are primarily due to the cost of natural gas increasing nationwide combined with increased natural gas usage on cooler days. SoCalGas is here to help you manage higher bills with our customer assistance programs, Ways to Save tools, and Level Pay Plan. Learn more at socalgas.com/ManageHigherBills</p> <p><u>Spanish:</u> Ha llegado el clima frío y es posible que note una factura de gas más alta. Esta temporada, las facturas más altas se deben principalmente al aumento del costo del gas natural a nivel nacional combinado con un incremento de uso de gas natural en los días más fríos. SoCalGas está aquí para ayudarle a administrar facturas más altas con nuestros programas de asistencia al cliente, las herramientas de ahorro de energía "Formas de Ahorrar," y el Plan de Pagos Nivelado. Obtenga más información en socalgas.com/FacturasAltas.</p>	<p>All customers calling the CCC who select the "billing" path</p>
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Sample On-bill Message:

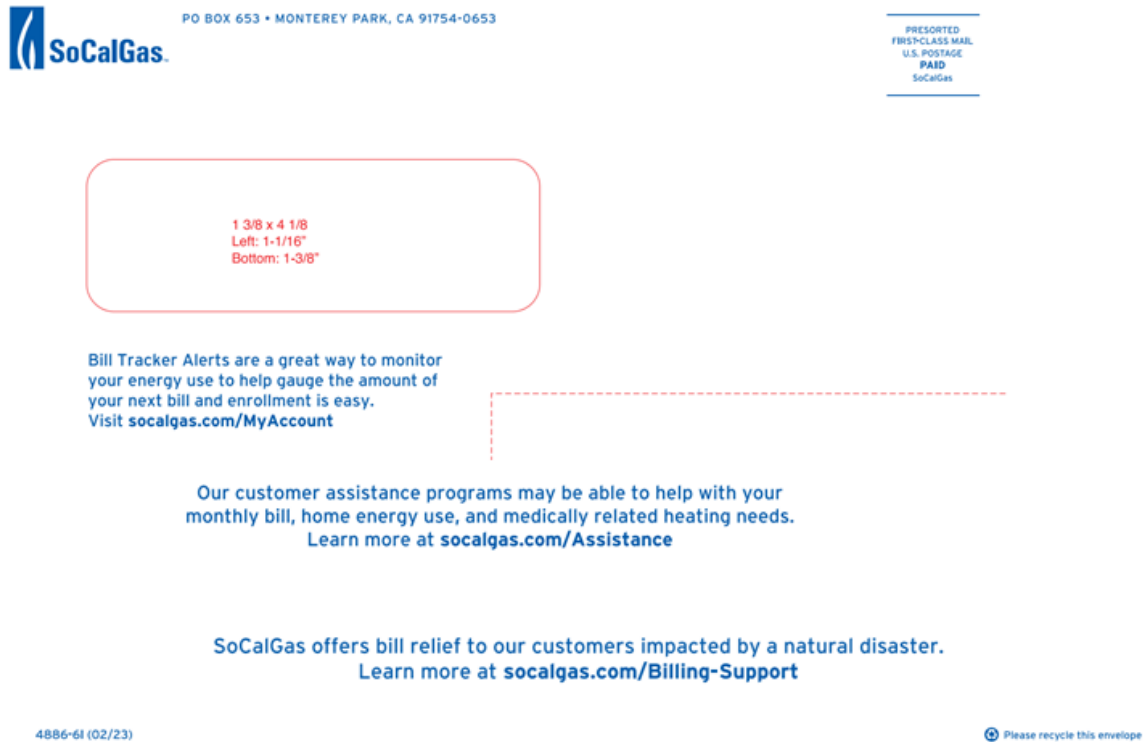
January 2023 sent to all residential customers receiving a paper bill (~2,380,151 customers). Bill messages varied and were placed throughout Fall/Winter months as space allowed.

Customer Affordability Message # XXXX, January 2023, All Residential, Cycles 1-21

“This winter, bills may be higher due to the increasing cost of natural gas nationwide combined with higher usage. We can help you manage your bills with our assistance programs, Ways to Save tools, and Level Pay Plan at socalgas.com/ManageHigherBills”

Bill Envelope Messages:

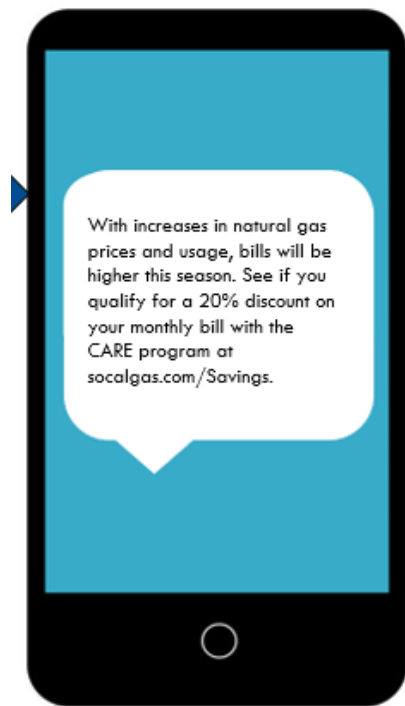
February 2023 bill envelope messages sample below, while various messages ran on the bill envelopes throughout the Fall/Winter months as space allowed.



Monthly CARE Text Messages:

SoCalGas customers that are eligible for subsidized or low-cost services due to certain qualifiers received text (SMS) messages based on assumed consent. These CARE program messages aim to raise awareness and encourage participation in the income qualified program. These communications are divided into three groups: 1) new customers, 2) existing customers not enrolled in CARE, and 3) customers eligible to

recertify for the program to continue to receive the 20% monthly bill discount and were leveraged with high gas prices awareness during winter months.



New Customers



**Existing Customers
Not On CARE**



**Recertify
Customers**

Public Handout:

A postcard sized hand out was created to distribute as needed to the public during public events. It was also provided as needed at SoCalGas’s Energy Resource Center to customers inquiring about high bills on site. (Spanish versions available upon request)



This winter natural gas prices had reached unprecedented levels on the West Coast. SoCalGas continues to diligently work to secure cost-effective natural gas supplies on behalf of our residential and small business customers. The price of natural gas is determined by broader regional, national, and global markets and is passed on directly to our customers without markup. SoCalGas does not profit from the movement of gas commodity prices.

To learn more about:

- How We Can Help
- Current and Historical Natural Gas Prices
- Understanding Your Bill
- Factors Affecting Your Monthly Bills
- Tools and Assistance Programs

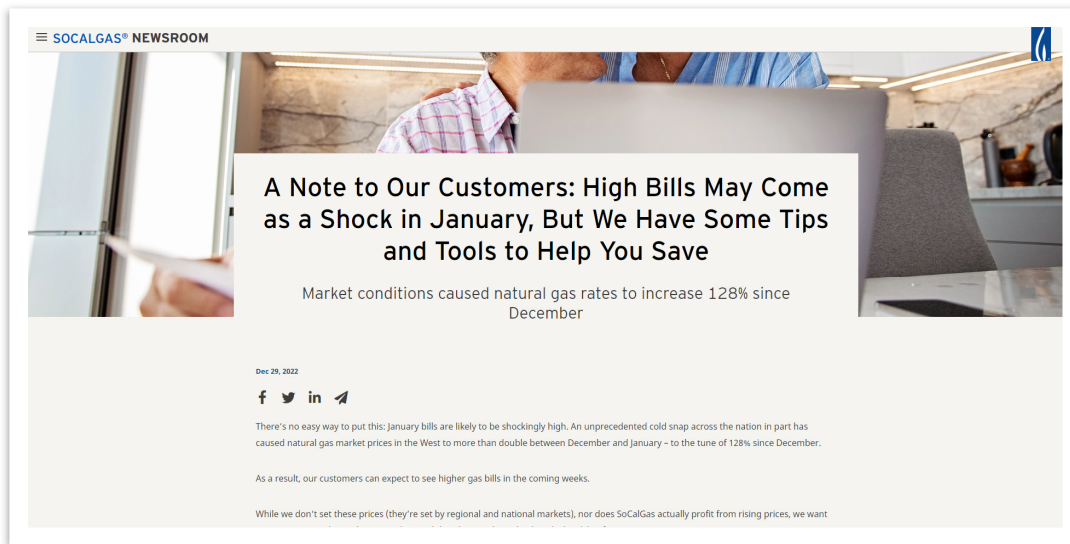


Visit socialgas.com/ManageHigherBills OR Scan here:

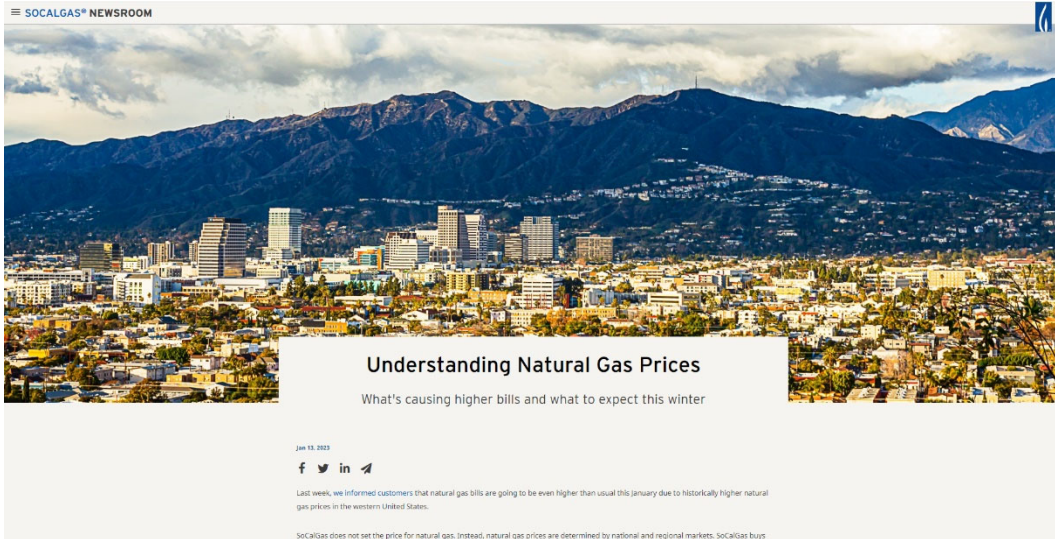
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SoCalGas.com/Newsroom – Sample News Stories

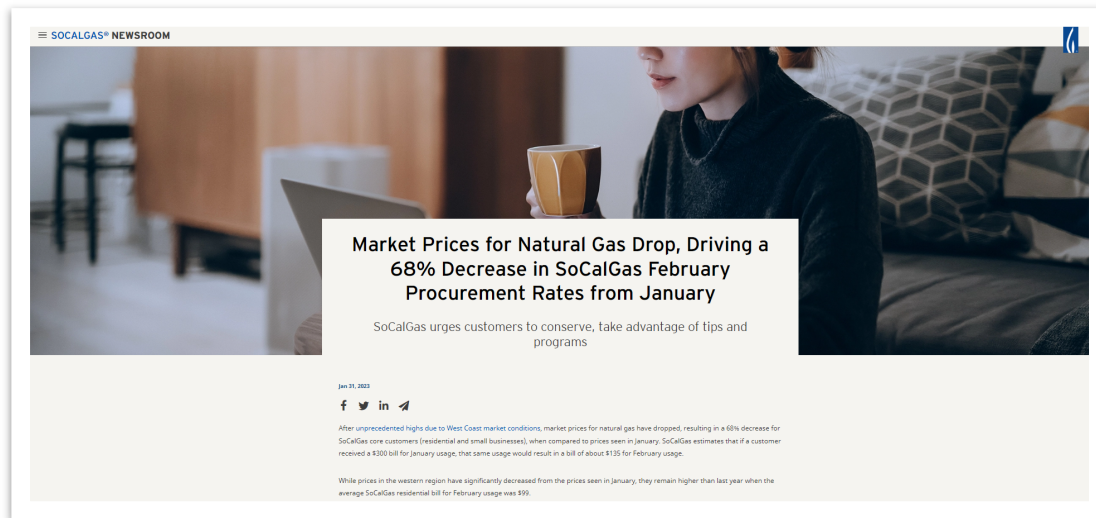
1. [A Note to Our Customers: High Bills May Come as a Shock in January, But We Have Some Tips and Tools to Help You Save](#) – Posted: December 29, 2022



2. [Understanding Natural Gas Prices](#) – Posted: January 13, 2023



3. [Market Prices for Natural Gas Drop, Driving a 68% Decrease in SoCalGas February Procurement Rates from January](#) – Posted: January 31, 2023



4. [Market Prices for Natural Gas Drop Again, Driving a More Than 80% Decrease in SoCalGas March Procurement Rates from January's High](#) – Posted: March 28, 2023



Market Prices for Natural Gas Drop Again, Driving a More Than 80% Decrease in SoCalGas March Procurement Rates from January's High

Feb 28, 2023



Southern California Gas Co. (SoCalGas) today announced that market prices for natural gas have dropped for the second month in a row, resulting in an 83% decrease in March's procurement rate for SoCalGas core customers (residential and small businesses), when compared

Sample Press Releases

- 1. [SoCalGas Provides Resources to Help Customers Save Money Ahead of Winter](#) – Posted November 14, 2022



MEDIA CONTACT

Candice Lee
Office of Media and Public Information
(213) 709-5295
clee4@socalgas.com


NEWS RELEASE

SoCalGas Provides Resources to Help Customers Save Money Ahead of Winter

SoCalGas partners with Google Nest, Southeast Community Development Corporation, Alma Family Services, and All People's Community Center to prepare customers for rising costs, also donating 500 energy efficient smart thermostats

LOS ANGELES, November 14, 2022 – In anticipation of cooler winter temperatures, [Southern California](#)

2. [SoCalGas Triples Contribution to Gas Assistance Fund to Help Customers Impacted by Historically High Natural Gas Prices](#) – Posted: January 6, 2023



MEDIA CONTACT
Brian Haas
Office of Media and Public Information
(213) 244-2442
bhaas2@socalgas.com

NEWS RELEASE

SoCalGas Triples Contribution to Gas Assistance Fund to Help Customers Impacted by Historically High Natural Gas Prices

Company encourages customers to take advantage of conservation tips and programs to help reduce their bills

LOS ANGELES – January 6, 2023 – Southern California Gas Co. (SoCalGas) today announced a \$1 million contribution to [the Gas Assistance Fund](#), a program that helps income-qualified customers pay their natural gas bills beginning Jan. 17. Customers will be facing bills that could be double or higher compared to last year’s winter bills.

The high bills are a result of historically high natural gas prices in the western United States. SoCalGas

3. [CPUC Approves Accelerated Climate Credit for SoCalGas Residential Customers](#) – Posted: February 2, 2023



MEDIA CONTACT

Brian Haas
Office of Media and Public Information
(213) 244-2442
bhaas2@socalgas.com

NEWS RELEASE

CPUC Approves Accelerated Climate Credit for SoCalGas Residential Customers

SoCalGas residential customers will receive a one-time California Climate Credit of \$50.77 in February or March, depending on their billing cycle

LOS ANGELES – February 2, 2023 – The California Public Utilities Commission (CPUC) today approved the acceleration of the California Climate Credit for Southern California Gas Company (SoCalGas) customers in response to the unprecedented natural gas prices impacting the Western United States. SoCalGas' residential customers will receive a credit of \$50.77 in their February or March bill.

The California Climate Credit is a state program designed to reduce greenhouse gas emissions. Some of

4. [SoCalGas Updates Customers on Current Natural Gas Prices](#) – Posted: February 15, 2023



MEDIA CONTACT

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Office of Media and Public Information
(213) 244-2442
bhaas2@socalgas.com

NEWS RELEASE

SoCalGas Updates Customers on Current Natural Gas Prices

Market conditions improve: critical out-of-state pipeline service restored; experts also cite improved weather conditions and related decrease in natural gas demand as contributing to lower market prices

SoCalGas continues to encourage customers to conserve as natural gas markets remain sensitive to changing weather and maintenance updates

LOS ANGELES – February 15, 2023 – Southern California Gas Company (SoCalGas) today provided customers with an update on natural gas prices across the West Coast. After a [significant drop](#) from unprecedented January natural gas commodity prices, market prices for March, 2023 are currently trending closer to 2022 prices.

- 5. [SoCalGas Announces \\$10 Million to Support Low-Income Families, Seniors and Small Restaurant Owners Impacted by Unprecedented Regional Gas Market Prices](#) – Posted: February 27, 2023



MEDIA CONTACT

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cgilbride@socalgas.com

NEWS RELEASE

SoCalGas Announces \$10 Million to Support Low-Income Families, Seniors and Small Restaurant Owners Impacted by Unprecedented Regional Gas Market Prices

Thousands newly eligible for winter bill assistance after SoCalGas bolsters United Way’s Gas Assistance Fund with historic \$5 million contribution

\$4 million will revive Fueling Our Communities – a collaboration with local nonprofits that has provided free meals and groceries to tens of thousands of Californians since 2020

Media and Outreach Events:

October/November 2022 - SoCalGas partnered with local organizations to share important resources and provide 500 Google Nest thermostats in preparation for winter. Partnering organizations included: Google, Southeast Community Development Corporation, Alma Family Services, All Peoples Community Center. Sample social/digital media coverage:



[Winter Conservation/Tips Video 1](#) – Posted via Facebook and Twitter on January 4, 2023



[Winter Conservation/Tips Video 2](#) – Posted via Facebook and Twitter on February 15, 2023



Winter Conservation/Tips Video 3 – Posted Via Facebook and Twitter on March 3, 2023



Social Media Sample of Posts (Facebook, Twitter and Instagram):

Social media campaign ran from December 2022 - March 2023 to help customers plan and prepare for higher winter bills and drive awareness around natural gas price volatility, tips, tools, programs, and services to support the variety of customer needs, and provide energy savings, safety, and conservation solutions for natural gas.

December 2022:

Weather Trigger: December 1, 2022

 **SoCalGas** @socialgas · Dec 1
It's getting colder! Here are some tips that can help save energy and money when the temperature drops. For more, visit socialgas.com/Save




Tips for Energy Savings This Winter

-  Wash and rinse clothes in cold water
-  Take shorter hot showers
-  Lower your water heater temperature

© 2022 Southern California Gas Company

Conservation Tip: December 7, 2022

 **SoCalGas** @socialgas · 20h
Save up to 10% a year on heating & cooling by simply turning your thermostat back 5-8 degrees from where you normally set it for 8 hours/day (when safe to do so). Get more energy-saving tips: socialgas.com/SavingTips



Weather Trigger: December 9, 2022

 **SoCalGas** ✓ @socialgas · 6s ...

With rainy and cool weather expected this weekend and lows dropping into the 30s early next week, here are some tips that can help you save money by reducing energy consumption. For more, visit socialgas.com/Winter



Tips for Energy Savings This Winter

© 2022 Southern California Gas Company * Only when safe to do so

-  Turn down thermostats 5-8 degrees*
-  Have air ducts checked for leaks
-  Clean or replace furnace filters

Assistance Programs: December 12, 2022

 **SoCalGas** ✓ @socialgas · 21h ...

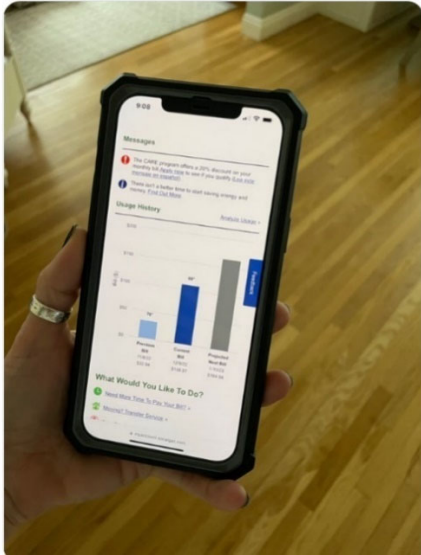
#DidYouKnow that you may be eligible to receive professional, energy-saving home improvements from an authorized contractor at no cost through the Energy Savings Assistance Program?!

Apply today:
socialgas.com/save-money-and...




Tip Tuesday: December 20, 2022

 **SoCalGas** @socialgas · 30s
#TipTuesday: Monitor your natural gas consumption, take steps to help reduce your usage, and avoid surprises on your bill. Customers with an Advanced Meter can sign up for weekly Bill Tracker Alerts through My Account – learn more: socialgas.com/pay-bill/my-ac...



High Bills Messaging: December 29, 2022

 **SoCalGas** @socialgas · Dec 29, 2022
As market conditions cause natural gas prices to rise, we offer our customers several tools to reduce energy use and help lower bills this winter. For more information, please visit: bit.ly/3Q0DGvV



Promote

1,014 3 6 11

January 2023:

Understanding Your Bill: January 3, 2023

 **SoCalGas**  @socialgas · 4m ...
In the new year, we are all looking for ways to save time, energy, and reduce expenses. Understanding your monthly SoCalGas bill can help – learn more @ socialgas.com/ManageHigherBi...






Dan The Weatherman - Saving Tips: January 4, 2023

 **SoCalGas**  @socialgas · Jan 4 ...
With more moderate to heavy rain and cooler temperatures on the way this week, make sure you follow these simple tips that could save as much as 22% on energy costs. For more tips, head to socialgas.com/Winter



Gas Assistance Fund: January 6, 2023

 **SoCalGas**  @socialgas · 21m ...
We continue to encourage customers to conserve and take advantage of cost savings tips and programs as winter weather and complex natural gas market conditions are likely to lead to higher bills for customers in the coming weeks.

	<p>newsroom.socialgas.com SoCalGas Triples Contribution to Gas Assistance ... Company encourages customers to take advantage of conservation tips and programs to help reduce ...</p>
-------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Energy Tips, Rebates, and Financing: January 9, 2023



SoCalGas @socialgas · 1m

To help customers manage energy usage and possibly save on bills, check out the latest energy-efficient appliances. We're here to help with our appliance buying guide. Look for energy tips, available rebates, low-interest financing, and more.

Click here: socialgas.com/save-money-and...



Gas Assistance Fund: January 10, 2023




Southern California Gas Company (SoCalGas)
Published by Andy Carrasco · 4m


Apply for a one-time grant to help you pay your natural gas bill. The Gas Assistance Fund is now available for qualifying customers. Learn more at socialgas.com/GAF



Assistance programs: January 12, 2023

 Southern California Gas Company (SoCalGas)
Published by Andy Carrasco · 1m · 🌐

SoCalGas is here to help you with your natural gas bills! Learn how our customer assistance programs can benefit you: socalgas.com/save-money-and-energy/assistance-programs



SOCALGAS.COM
Assistance Programs | SoCalGas
We offer several programs that can help you save money on your natural gas bill, such as Calif...

Tip Tuesday: January 16, 2023

 SoCalGas @socalgas · 9m

#TipTuesday: Save roughly 10-15% on your heating bills with caulking & weather-stripping.

For more savings tips, visit socalgas.com/Winter



Weather Trigger: January 19, 2023

 SoCalGas @socalgas · 6m

Temperatures are dropping as low as the 30s over the next few nights. Here are some winter weather tips that could help save money by reducing your energy consumption.

For more, visit socalgas.com/Winter

Tips for Energy Savings This Winter

-  Wash and rinse clothes in cold water
-  Take shorter hot showers
-  Lower your water heater temperature

© 2023 Southern California Gas Company

Promote

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Tip Tuesday: January 24, 2023



SoCalGas @socialgas · 3m

#TipTuesday: We offer various Customer Assistance Programs that could help you with your natural gas bills, provide energy-saving home improvements, and more. Visit: socialgas.com/Assistance



Assistance Programs: January 27, 2023



SoCalGas @socialgas · 3m

During winter, customers can experience a 3-7 times increase in their natural gas usage. Check out these savings tips that can help reduce your energy bill!

socialgas.com/Save



Promote

🗨️ ↻️ 1 ❤️ 1 📊 29 ↗️

Assistance Programs: January 31, 2023



SoCalGas @socialgas · 5m

We are here to help our customers with various resources. Visit socialgas.com/Save to learn more about our energy savings tips, customer assistance programs, rebates, and more.



February 2023:

Climate Credit: February 9, 2023



SoCalGas @socialgas · 14m

We support @CaliforniaPUC accelerating the April CA Climate Credit. Residential customers will receive the credit in February or March depending on your gas billing cycle. The electric portion will come from customer's respective electric provider. More: cpuc.ca.gov/climatecredit/



California Climate Credit moved up.
SoCalGas customers will receive \$50.77
for natural gas portion of credit.



Weather Trigger: February 14, 2023

SoCalGas @socalgas · Feb 14

With [#temperatures](#) dropping to the 20s for the coasts and valleys and single digits for the mountains and deserts the next few mornings, here are some tips that can help you save money by reducing [#energy](#) consumption. Head to socalgas.com/Winter for more ways to save.



Tips for Energy Savings This Winter

- Turn down thermostats 5-8 degrees*
- Have air ducts checked for leaks
- Clean or replace furnace filters

© 2022 Southern California Gas Company * Only when safe to do so

Promote

18 7 9 2,861

Saving Tips: February 15, 2023

SoCalGas @socalgas · Feb 15

During the [#winter](#) months, heat loss can have a noticeable impact on a home's energy bills. Here are a few tips on insulating your home that could help lower energy costs by up to 20%. For more tips that could help reduce your [#energy](#) consumption, head to socalgas.com/Winter



1:14 852 views

Promote

21 10 10 3,448

Dan The Weatherman - Saving Tips: February 15, 2023

 **SoCalGas** @socialgas · Feb 15

During the #winter months, heat loss can have a noticeable impact on a home's energy bills. Here are a few tips on insulating your home that could help lower energy costs by up to 20%. For more tips that could help reduce your #energy consumption, head to socialgas.com/Winter



28 14 15 4,834

Weather Trigger: February 21, 2023

 **SoCalGas** @socialgas · 2m

A winter storm is bringing cold and wet weather to southern California for the rest of the week. Here are a few winter weather tips that can help you reduce your overall energy consumption. For more, visit socialgas.com/Winter



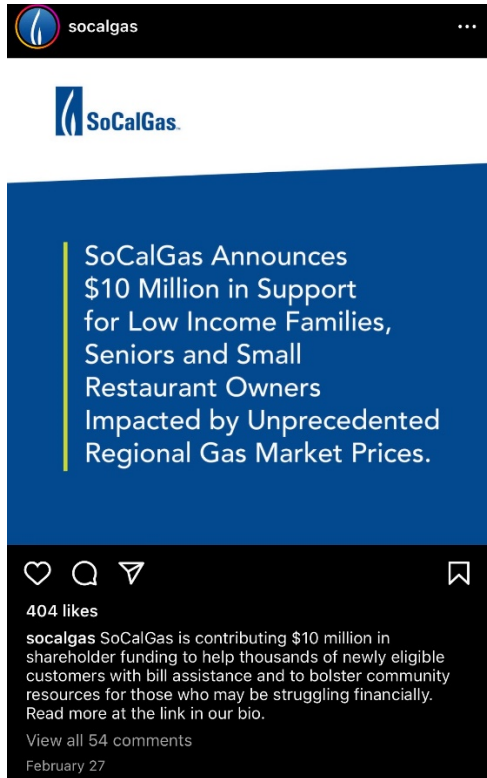
Tips for Energy Savings This Winter

- Wash and rinse clothes in cold water
- Take shorter hot showers
- Lower your water heater temperature

© 2022 Southern California Gas Company

Promote

\$10M in Support: February 21, 2023



The image shows a Facebook post from the page 'socialgas'. At the top is the profile picture and name 'socialgas'. Below is the SoCalGas logo. The main content is a blue graphic with white text: 'SoCalGas Announces \$10 Million in Support for Low Income Families, Seniors and Small Restaurant Owners Impacted by Unprecedented Regional Gas Market Prices.' Below the graphic are icons for likes, comments, shares, and a bookmark. The text '404 likes' is visible. The post description reads: 'socialgas SoCalGas is contributing \$10 million in shareholder funding to help thousands of newly eligible customers with bill assistance and to bolster community resources for those who may be struggling financially. Read more at the link in our bio.' It also includes 'View all 54 comments' and the date 'February 27'.

Tip Tuesday: February 28, 2023



The image shows a Twitter post from the verified account 'SoCalGas' (@socialgas), posted 20 hours ago. The text of the tweet is: '#TipTuesday: Take control of your energy use! Our award-winning Ways To Save tool makes it easy to learn ways to manage your usage and help save on your monthly bill - visit socialgas.com/WaysToSave'. Below the text is a photograph of a woman in a yellow sweater sitting on a couch, petting a cat while looking at a laptop. The laptop screen displays the 'Ways To Save' website. Below the photo is a 'Promote' button. At the bottom are icons for replies (2), retweets (3), likes (3), views (526), and a share icon.

March 2023:

Market Price for Natural Gas Drop: March 1, 2023



SoCalGas @socalgas · 4m

Market prices for natural gas have dropped for a second month, resulting in an 83% decrease when compared to January. SoCalGas estimates that average residential bills will drop from \$300 for January usage to an estimated \$100 for March usage. Read more: ow.ly/WqBp50N6CQY

SoCalGas

Market Prices for Natural Gas Drop Again, Driving a More Than 80% Decrease in SoCalGas March Procurement Rates from January's High

Promote

1 21

Dan The Weatherman - Saving Tips: March 3, 2023



SoCalGas @socalgas · Mar 3

Everyone is looking for ways to lower their energy bills. Here is Dan the Weatherman with a few water heating tips that could help you save money this winter. For more tips that could help reduce your energy consumption, head to socalgas.com/Winter

DAN THE WEATHERMAN'S
Winter Weather Tips

1:39 546 views

15 6 9 2,387

Assistance Programs: March 6, 2023

← **SoCalGas**  10.2K Tweets

SoCalGas  @socialgas · 2m

If you are having trouble paying your gas bill, our customer assistance programs may be able to help - visit socialgas.com/assistance

SBSS @SBSSla · 6h

We are proud to partner with SoCalGas to help relieve seniors struggling to pay their gas bills. If you want more information about this program or how to sign up, contact us at info@sbssla.org.


Thank you, SoCalGas, for providing this wonderful service

AT SOCIALGAS®, OUR COMMITMENT IS HELPING YOU **SAVE ENERGY AND MONEY** 

Find out which of our **CUSTOMER ASSISTANCE PROGRAMS** is best for you:

 HELP WITH YOUR BILL	 HELP FOR YOUR HOME	 HELP FOR MEDICAL NEEDS
Save 20% on your monthly natural gas bill	Receive home improvements from professional contractors at no cost to you	Get additional natural gas at the lowest baseline rate if you have a serious health condition
CARE Program (California Alternate Rates for Energy) 1-800-427-2200	Energy Savings Assistance Program 1-800-331-7993	Medical Baseline Allowance Program 1-866-431-3517


For more information on these programs please visit: socialgas.com/assistance







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Tip Tuesday: March 7, 2023






socalgas 

socalgas #TipTuesday: Shaving 1 minute off the amount of the time your shower is running can potentially save over 900 gallons of heated water a year. For more ways to help reduce energy consumption and lower your bills, head to socialgas.com/Save


chefstarrcornwall I was actually working so that I can pay my stupid high gas bill when you guys did the zoom. Whatever with about you raising the cost of gas, it is not our responsibility to pay for your upgrades. You were supposed to be

[View insights](#) [Boost post](#)

♥   

Liked by **auskr** and 37 others

1 DAY AGO

 Add a comment... [Post](#)

Gas Assistance Fund: March 16, 2023



SoCalGas 
@socialgas



More customers can now qualify to receive a one-time grant for up to \$400 to help them pay their natural gas bill. Eligible applicants age 55+ or w/ an older adult living in their household, could receive up to \$500! Learn more abt the Gas Assistance Fund: socialgas.com/GAF



Weather Trigger: March 20, 2023



SoCalGas  @socialgas · 28m



With more rain, mountain snow, and below average temperatures on the way for the first half of the week, here are some tips that can help you save money by reducing energy consumption. Head to socialgas.com/Winter for more ways to save.

Tips for Energy Savings

-  Turn down thermostats 5-8 degrees*
-  Wash and rinse clothes in cold water
-  Take shorter hot showers

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* If health permits

ATTACHMENT B

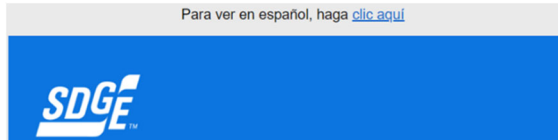
SDG&E's winter 2022-2023 customer communications and outreach

ATTACHMENT B

SDG&E 2022-2023 High Bills Communications

Email One

Below is a sample email sent to residential customers November 8 through November 11. The email was tailored for either bundled or unbundled residential and small and medium businesses.



Get to know your power

At SDG&E, we know you count on us every day for the energy you need to power your homes and lives. We also recognize many Californians are facing higher than usual bills across a range of products and services, including energy bills. So as the weather cools off and the likelihood that you may use more energy to heat your home increases, we want to help you plan and prepare for higher energy costs this winter.

Given the feedback we heard from customers last winter about avoiding surprises, we also wanted to make you aware that SDG&E will update its energy pricing on January 1, 2023. Unfortunately, natural gas prices in the worldwide wholesale market have reached a 14-year high and continue to impact not only the cost of fuel to heat homes and run appliances but also the price to generate electricity. Energy prices are also forecasted to increase due to the ongoing need to make safety, reliability and climate resiliency investments that include battery storage, electric vehicle infrastructure and wildfire protection.

We recognize there is never a good time for higher energy bills, even when they reflect the extensive work needed for a stronger, healthier and safer energy future. But it's our responsibility to be transparent with you. While our pricing won't be finalized until the end of the year, we have performed preliminary forecasts for January 1, 2023, pricing that we can share with you. This forecast could change between now and the end of the year when our pricing is finalized. As a reminder, winter pricing is effective November 1 through May 31.

Based on our preliminary forecast, the average residential customer could see an increase of \$28 on their monthly electric bill and an increase of \$6 on their monthly natural gas bill, January 1, 2023. Actual customer bills will vary based on a number of factors, including a customer's usage and pricing plan, as well as weather and market conditions.

Assistance programs and resources

SDG&E offers a variety of programs to provide direct assistance to customers in need, including a monthly discount program and payment arrangements. To learn more, visit sdge.com/assistance.

In addition, below are a few tips to help manage energy use and keep bills as low as possible before temperatures drop. More information and resources are available on sdge.com/myenergy.

- You can cut a load of laundry's energy use in half by using warm water instead of hot water; using cold water will save even more.
- Check your furnace filter as dirty air filters can increase energy costs.
- Wrap old water heaters with proper insulating jackets and set the temperature to 120 degrees F (or lower).
- For customers on a Time-of-Use plan, utilize the delay start button on your dishwasher and washing machine to run outside the on-peak hours of 4 p.m. to 9 p.m.

As we continue to analyze how January 1 rate changes may impact bills, you should expect to hear from us again in the coming months. To learn more about what goes into your bill, why it's rising and what we are trying to do about it, please visit sdgeratesinfo.com.

Email Two

Sent to assigned commercial and industrial customers in December 2022.

FINAL – Approved 12-13-2022

Account Executive Email – December Rate Communications

Updated December 13, 2022

Audience: Assigned accounts – to be personalized by Account Executives

Distribution – Starting December 14, 2022

Subject line: SDG&E winter energy pricing update

Body:

Dear (customer name),

As part of our ongoing commitment to be transparent about our rates and bills, I am writing to provide you with an update on the latest trends in the natural gas market and how this, coupled with cold weather, could impact SDG&E bills. We also want to remind you that gas and electric prices will increase on January 1, 2023. Click here to [learn more](#).

Natural gas market prices have remained elevated and volatile across the U.S. this year. While natural gas prices briefly dipped, we saw a significant increase between November and December. Natural gas rates increased by 19%. This spike is driven by increases in the market price of natural gas. As a reminder, what SDG&E pays to buy natural gas on behalf of our customers is a direct passthrough and SDG&E makes no profit on these purchases of natural gas.

Based on the latest market dynamics – frigid weather across the West, low storage levels, and other factors impacting supply and demand – current forecasts suggest that natural gas market prices may continue to increase through January. This would result in even higher bills relative to last winter. Bill impacts will vary based on a customer's usage and pricing plan, as well as weather and market conditions.

Now's an excellent time to take advantage of ways to control your energy use. We're here to help you be successful this winter. Please feel free to reach out directly to me should you have questions, require additional information, or would like to schedule a briefing.

Sincerely,

[Account executive name]

Email three

Below is a sample email sent to residential customers December 14 through December 15. The email was tailored based on a customer's pricing plan for both residential and small and medium business.



With the sun setting earlier, combined with winter temperatures, that may mean running your lights and heater more, which can lead to higher energy bills. Energy bills may also be higher than expected due to the increase in natural gas market prices. Natural gas market prices have remained elevated and volatile across the U.S. this year. Between November and December, we saw residential natural gas rates increase by 19% driven by a spike in the market price of natural gas.

As a reminder, the price of natural gas purchased to serve our customers is a straight passthrough and SDG&E makes no profit. As we move into January, when weather in our region is typically the coldest and natural gas usage is the generally the highest, current forecasts suggest the market price of natural gas could increase further, resulting in even higher customer bills relative to last winter.

Now's an excellent time to take advantage of ways to control your energy use. We're here to help you be successful this winter so we have gathered a few winter energy tips to help you [save](#).^{*} We also want to remind you that gas and electric prices will increase on January 1, 2023. [Click here learn more](#). We will communicate to you in January once rates are final.

Energy savings tips


- Caulk and weather-strip around drafty doors and windows. Use a door sweep, door sock or towel at the bottom of doors with a gap.
- Log on or enroll in [My Account](#) to view and compare your energy use by months, days or hours, to identify patterns in your energy usage and opportunities to make changes.
- Take our quick 5-minute survey to see where your electricity is going and get a plan to help you save. [Take the survey](#)

For more savings tips, visit sdge.com/MyEnergy

Email four "

Sent to all residential and business customers in January 2023

Para ver en español, haga [clic aquí](#)



Many customers are facing higher bills, and we recognize our responsibility to be transparent with you as prices change. As a follow-up to our communications these past two months about higher natural gas and electricity pricing, we want you to know that new pricing became effective on January 1, 2023.

Natural gas pricing

Since our last communication, natural gas prices have increased dramatically, primarily driven by frigid temperatures across most of the country and on-going supply challenges.

Effective January 1, 2023, a typical residential customer can expect an increase of ~\$120 on their monthly natural gas bill relative to last January.

Residential natural gas usage is typically the highest in January when the weather in our region has historically been the coldest. Actual electric and gas customer bills will vary based on a number of factors, including usage and pricing plan, weather and natural gas market conditions. Natural gas rates are updated monthly on customers' bills, whereas major changes to electric rates typically occur once or twice a year. If prices for natural gas go down, customers see that adjusted monthly on their bill. SDG&E does not mark up the market cost for gas and does not make a profit from rising gas.

Electric pricing

A typical residential customer can expect an increase of approximately ~\$24 on their monthly electric bill. This change is primarily driven by the increased cost of purchasing electricity along with investments in safety and reliability and increasing state-mandated costs. Actual customer bills will vary based on a number of factors, including usage and pricing plan, weather and market conditions.

Resources to help you manage higher bills

We're here to help if you need it. We have programs and resources available to help you manage your energy use and provide direct assistance, including payment arrangements, [Level Pay](#) program and monthly discounts. You can also avoid surprises on your bill by signing up for My Account to receive [Energy Alerts](#). Please visit sdge.com/MyEnergy for energy saving tips, financial assistance, and rebate information.

Investing in the future

You count on us every day for the energy you need, and our job is to continue to deliver clean, reliable energy that is resilient to increasingly extreme climate conditions and temperatures. We have an obligation to prepare for the future, so we are taking the steps to strengthen our energy infrastructure by:

- Hardening our electric grid against climate threats such as wildfires
- Modernizing the grid to accommodate more renewables, energy storage, microgrids, electric vehicles, and all-electric buildings in order to meet California's ambitious goals to reduce greenhouse gas emissions

Responsible investments today will help to create a future that is cleaner, safer and reduce outages. However, these climate resiliency investments, along with the surge in natural gas costs, impact rates.

Email five

Sent to assigned commercial and industrial customers in January 2023.

January 1, 2023 Winter Communications – C&I Account Executive Communications

Update January 4, 2023

Background: This email will be personalized by the Account Executives and sent to their respective accounts.

UNBUNDLED ONLY – CCA and DA ACCOUNTS

Subject line: New 2023 energy pricing now effective

Body:

Dear [customer name],

As promised, I am writing to share with you the new electric and natural gas rates that took effect on January 1, 2023.

As you may recall, we started communicating our January 1, 2023, bill forecast with our customers these past couple of months. Since our last communication, natural gas prices in the wholesale market have continued to rise, in part because of the frigid temperatures that blanketed much of the country during the last two weeks of 2022.

The ongoing rise in natural gas prices account for the majority of the increases in both our electric and natural gas rates, which were finalized at the end of December. We recognize there is never a good time for higher energy bills, even when they reflect the extensive work needed for a stronger, healthier and safer energy future. But it's our responsibility to be transparent with you.

Gas rate changes

Based on the latest market dynamics – frigid weather across the West, low storage levels, and other factors impacting supply and demand – natural gas market prices have reached historic highs resulting in significantly higher bills relative to last winter. Actual bill impacts will vary based on a customer's usage and pricing plan, as well as weather and natural gas market conditions. Natural gas rates are updated monthly on customers' bills. If prices for natural gas go down, customers see that adjusted monthly on their bill. SDG&E does not mark up the market cost for gas and does not make a profit from rising gas prices.

- Core Commercial & Industrial (C&I) customers – The estimated class average transportation rate increases by 2 cents per therm, from 81 cents/therm to 83 cents/therm. The estimated PPPS rate decreases by 2 cents per therm, from 10 cents/therm to 8 cents/therm. The commodity price of the rate increased from \$1.05 per therm to 3.45 per therm for the month of January.
- Noncore C&I customers (Distribution) – The estimated class average transportation rate increases by 13 cents per therm, from 16 cents/therm to 29 cents/therm. The estimated PPPS rate decreases by 2 cents per therm, from 11 cents/therm to 9 cents/therm.

Electric rate changes

The following are SDG&E's Utility Distribution Company (UDC) class average electric rates effective January 1, 2023. Your specific rate and bill impact may be higher or lower depending on your service voltage, pricing plan and usage pattern.

SDG&E's UDC class average rates includes the cost of electricity delivery and service (transmission, distribution, and public purpose programs). It **does not** include charges for electric generation, the cost to purchase electricity on your behalf by either your Community Choice Aggregator (CCA) or Direct Access provider, or your PCIA rates which vary by customer depending on what vintage rate you are on. For information on the cost of electric generation, please contact your CCA or DA provider.

- Medium/large commercial and industrial unbundled customers – The class average UDC total rate increased by approximately 2.6 cents/kWh, from 14.6 cents/kWh to 17.2 cents/kWh.
- Small commercial unbundled customers – The class average UDC total rate increased by approximately 3.0 cents/kWh, from 19.8 cents/kWh to 22.8 cents/kWh.

Now's an excellent time to take advantage of ways to control your energy use. We're here to help you be successful this winter. Please feel free to reach out directly to me should you have questions, require additional information, or would like to schedule a briefing.

To learn more about what goes into your bill, why it's rising and what we are trying to do about it, please visit sdgeratesinfo.com.

Sincerely,

AE Name

Email six

Sent to all residential and small/medium business customers January 30 through February 2, 2023.



As a follow-up to the email we sent in early January about historically high natural gas pricing in the West, we are contacting you to provide an update.

Compared to January's historic gas market prices, **the price of gas has decreased by nearly 68% from \$3.45 per therm to \$1.11 per therm, effective February 1.** As a result, the expected average gas bill for residential customers (commodity plus delivery charges and other mandated fees and taxes) is expected to decrease to \$110 in February, from approximately \$225 in January. Your actual bill will vary and depending on your billing cycle and your household's energy usage you may not see the lower gas price reflected on your bill until sometime in February or early March.

SDG&E expects to provide you with a credit on the gas portion of your bill in February and your electric portion of your bill in March with **the acceleration of the California Climate Credit.** These credits and the decrease in gas pricing will hopefully provide you with a meaningful reduction in winter bills.

While we are optimistic about gas prices in the coming months, the market is still volatile. Gas prices are updated monthly based on forecasted market conditions and reflected in the price customers pay. Even with lower pricing, it's important to remember that weather conditions and usage can still lead to higher bills than you're used to, especially as we turn up the heat when the temperature drops. We also want you to know that we have programs and resources to help you manage your energy use and provide direct assistance should you need it.

Resources to help

- **A variety of [customer assistance programs](#)** may be available for qualifying residential customers, including a monthly discount of 30% or more with the CARE program, emergency payment assistance, and debt forgiveness. The Neighbor-to-Neighbor program, funded entirely by SDG&E shareholder dollars (not customer dollars), provides eligible customers up to \$300 to offset their outstanding bills. The federally funded Low-Income Home Energy Assistance Program (LIHEAP) offers financial help ranging from a few hundred to a few thousand dollars, depending on household income, size and past due balances.
- **[Energy Alerts](#)** are an easy way to monitor your energy use and bill before it arrives. Customize your notifications for when your bill reaches a dollar amount you set or get weekly. Or, you can get notified of your usage and projected bill each week or halfway through your bill cycle.
- **[Level Pay](#)** can help make your energy bill more predictable. Level Pay averages your energy bill every three months so you can budget more easily.
- Take our [Home Energy Survey](#) to help you identify key ways energy inefficiencies in your home could be costing you money. You can also **save on products** that can improve your home's comfort, health and energy efficiency with the [Golden State Rebate program](#).

For more information on energy savings tips and resources to help you manage your energy use and bill, please visit [sdge.com/myenergy](https://www.sdge.com/myenergy).

Email seven

Sent to all residential and small/medium business customers in March

Para ver en español, haga [clic aquí](#)



Relief is in sight as natural gas prices continue to decline for the second month as we head into March, with the cost per therm at \$0.60 compared to \$3.45 per therm in January.

The typical residential customer's gas bill (commodity plus delivery charges and other mandated fees and taxes) is expected to decrease to ~\$85 in March, from ~\$225 in January. There's also good news for customers with electric service as they can also expect to see the California Climate Credit of \$60.70 on their bill.

SDG&E commits \$16 million to help customers

Even with this welcome news of lower gas pricing and electric climate credit, we recognize that customers are facing higher-than-usual bills across a range of products and services, including utilities. To support our community, SDG&E announced that it is providing \$16 million in shareholder funding to help customers with bill assistance and bolster community resources for residents who may be struggling financially.

Available resources to help with your bill

- With the additional funding provided by SDG&E, the [Neighbor-to-Neighbor program](#) now provides eligible customers up to \$600 to offset their outstanding bills. SDG&E customers may apply if they are experiencing serious illness, temporary unemployment, [disability](#) or unusual hardship.
- A new no-cost energy efficiency upgrade program for renters and owners of single-family homes is now available. [Residential Energy Solutions](#) has no income restrictions and has the potential to help local families achieve long-term savings on their energy bills.
- [Energy Alerts](#) are an easy way to monitor your energy use and bill before it arrives. Customize your notifications for when your bill reaches a dollar amount you set or get weekly.

Additional Super Off-peak hours in March and April

As a customer with electric service, there is more good news in March. Because you are on a Time-of-Use pricing plan with super off-peak hours, you have more opportunities to save. For March and April, there are additional super off-peak hours from 10 am to 2 pm where energy is priced the lowest. During these times, try to shift using major appliances to maximize savings.



Day Type	Time Period	Pricing Tier	Price Level
MONDAY THROUGH FRIDAY	12 AM - 6 AM	Super Off-Peak	\$
	6 AM - 10 AM	Off-Peak	\$\$
	10 AM - 2 PM	Super Off-Peak (March & April)	\$
	2 PM - 4 PM	Off-Peak	\$\$
	4 PM - 9 PM	On-Peak	\$\$\$
9 PM - 12 AM	Off-Peak	\$\$	
WEEKENDS AND HOLIDAYS	12 AM - 2 PM	Super Off-Peak	\$
	2 PM - 4 PM	Off-Peak	\$\$
	4 PM - 9 PM	On-Peak	\$\$\$
9 PM - 12 AM	Off-Peak	\$\$	

For more information on energy savings tips and resources to help you manage your energy use and bill, please visit sdge.com/MyEnergy.

Digital Ads

Ran from November 2022 – February 2023 and connected customers to sdge.com/MyEnergy.

This digital advertisement features a photograph of two white front-loading washing machines with folded laundry on top. The background is a dark blue gradient. The text is white and orange. The main headline reads "GET TO KNOW YOUR POWER". Below it, a sub-headline states "Reducing energy use from 4-9 p.m. helps lower bills and helps the environment". The SDGE logo is in the bottom left, and a small orange box with the text "MORE WINTER SAVINGS" is in the bottom right. The right side of the ad features the SDGE logo, the URL "sdge.com/myenergy", and a larger orange box with "MORE WINTER SAVINGS".

GET TO KNOW YOUR POWER

Reducing energy use from 4-9 p.m. helps lower bills and helps the environment

SDGE MORE WINTER SAVINGS

SDGE MORE WINTER SAVINGS

SDGE
sdge.com/myenergy
MORE WINTER SAVINGS

This digital advertisement features a photograph of a white thermostat with a temperature scale in both Celsius (10, 20, 30) and Fahrenheit (50, 60, 70, 80, 90). The background is a dark blue gradient. The text is white and orange. The main headline reads "GET TO KNOW YOUR POWER". Below it, a sub-headline states "Save as much as 10% on heating costs by lowering your thermostat". The SDGE logo is in the bottom left, and a small orange box with the text "MORE SAVINGS" is in the bottom right. The right side of the ad features the SDGE logo, the URL "sdge.com/myenergy", and a larger orange box with "MORE SAVINGS".

GET TO KNOW YOUR POWER

Save as much as 10% on heating costs by lowering your thermostat

SDGE MORE SAVINGS

SDGE MORE SAVINGS

SDGE
sdge.com/myenergy
MORE SAVINGS

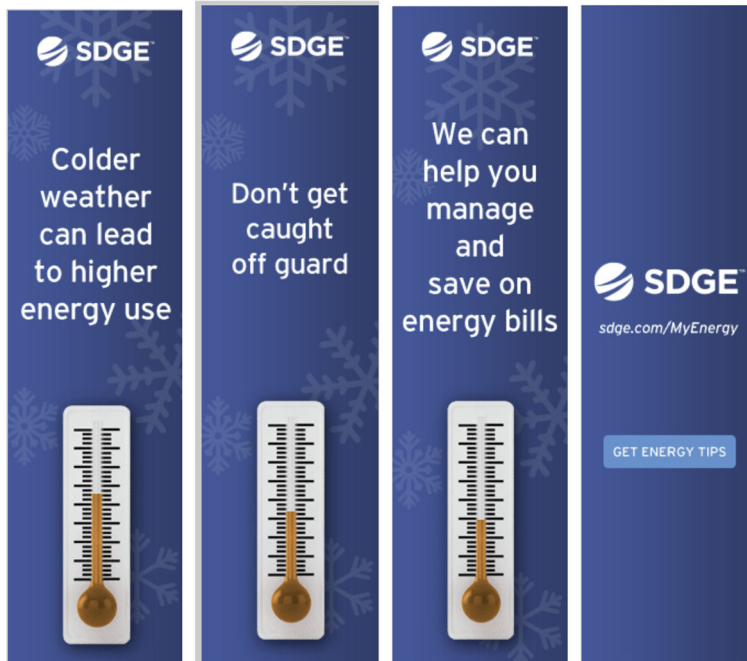
Digital Ads

Ran in January 2023 and connected customers to sdge.com/Rates



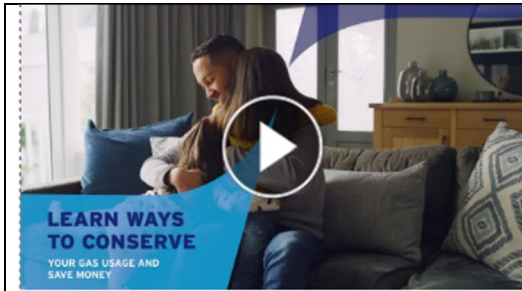
Digital Ads

Ran during the last week of February 2023 during a period of unusually cold weather.



Videos 1

Sixty second video, both English and Spanish versions, providing natural gas tips that ran in paid advertising from January through February 2023



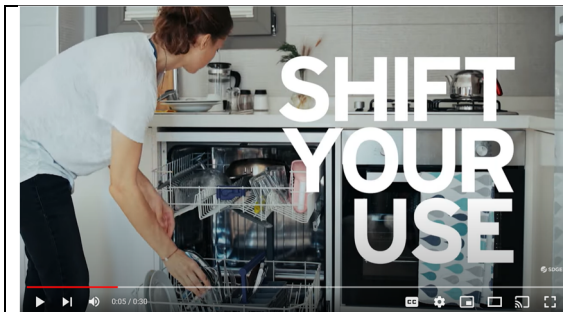
https://youtu.be/P_P1EyungZY



<https://youtu.be/xQnHlkCYioM>

Videos 2

Sixty second video, both English and Spanish versions, that ran in a paid digital campaign from November 2022 – January 2023, featuring electric tips to save on winter energy bills.



https://youtu.be/FqIFVh_F2M0



<https://youtu.be/KrOABev3kOs>


Web – sdge.com/MyEnergy

Throughout the campaign customers were encouraged to visit sdge.com/MyEnergy for tips and resources for saving energy and money, including specific tips related to winter heating. The page also includes information on assistance programs and other resources.

The screenshot displays the SDGE MyEnergy website interface. At the top, the SDGE logo is on the left, and navigation links for Residential, Businesses, and More Info are in the center. On the right, there are links for Languages, Outages, NewsCenter, Wildfire Safety, Search, and Contact Us. Below this is a secondary navigation bar with links for My Account, Customer Service, Pricing Plans, Electric Vehicles, Pay Bill, Savings Center, Solar, and Builder Services. The main content area starts with a blue banner titled "Get to Know Your Power" with a sub-header "Natural gas prices are historically high nationwide and may lead to higher-than-expected winter bills. We're here to help with tips, resources and assistance programs to help you manage your energy usage and bill. [Business customers, click here.](#)" and a "Español" button. Below the banner is a box titled "Understanding Your Bill" with the text "Ever wonder exactly what you're paying for? [Learn more about your SDG&E bill](#) and how rates are set." The next section is "Energy Management Tools" featuring four video thumbnails: "My Energy Charts", "Energy Alerts", "Home Energy Checkup", and "How to Read Your Bill". Each thumbnail has a brief description below it. The "3 Ways to Cut Your Natural Gas Winter Heating Bill" section follows, with three columns: "Control Humidity" (with an image of a humidifier), "Heat Efficiently" (with an image of a woman adjusting a thermostat), and "Use Space Heaters" (with an image of a person sitting on a sofa). Each column includes a short tip. The final section is "Energy-Saving Tips for Your Home" with three icons representing a sun, a flame, and a plug.

My Account App One

When customers log into My Account to see their personalized energy information, a message about winter pricing was also posted to make them aware of higher prices and reinforce that assistance was available.


 <p>The screenshot shows the SDGE My Account app interface. At the top left is the SDGE logo. At the top right, it displays the user's name 'BRIAN SAUNDERS' and a dropdown arrow. Below this is a grey notification banner titled 'Winter Pricing Update' with a close button (X). The banner text reads: 'Natural gas prices are at a historic high in the West and winter bills could soar. We are here to help. For information on debt forgiveness, one-time payments, monthly bill discounts and more please Click here.' Below the banner is a navigation menu with items: Home, Billing, Usage, Account, Services, Outlets, and What to Do. The main content area shows 'Dashboard' and 'Accounts' with a dropdown menu showing '1st METER (12/11/14) Service On: 01/01/15'.</p>	<h3>Winter Pricing Update</h3> <p>Natural gas prices are at a historic high in the West and winter bills could soar. We are here to help. For information on debt forgiveness, one-time payments, monthly bill discounts and more please, Click here.</p>
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Homepage Banner One

The screenshot shows the SDGE homepage banner. At the top left is the SDGE logo. To its right are navigation links: Residential, Businesses, and More Info. Further right are links for Languages, Outages, NewsCenter, Wildfire Safety, and Se. Below this is a dark blue navigation bar with links: My Account, Customer Service, Pricing Plans, Electric Vehicles, Pay Bill, Savings Center, Solar, and Builder Services. The main banner area has a dark blue background with a gas stove burner. On the left is a white 'Welcome to My Account' box containing a 'Login' button, links for 'Forgot Username or Password?' and 'New to My Account? Sign up today', and 'Download on the App Store' and 'GET IT ON Google Play' buttons. To the right of the box is the headline 'Natural gas prices at historic high' and sub-headline 'Winter bills could soar due to extraordinary market conditions nationally', with a 'Learn more' button. At the bottom of the banner are five small circular icons.

Bill Package Messaging

The following bill insert was included in the December bill package, which is distributed to some 700,000 customers.




**GET TO KNOW
YOUR POWER**

At SDG&E®, we recognize many Californians are facing higher than usual bills across a range of products and services, including energy. That's why we want to help you prepare for higher energy bills this winter.

Natural gas prices in the worldwide wholesale market have reached a 14-year high and continue to impact the price to generate electricity. Energy prices are also forecasted to increase due to the ongoing need to make safety, reliability and climate resiliency investments. We recognize there is never a good time for higher bills, but it's our responsibility to be transparent with you. We also want to help you find ways to save energy and manage your bills, or connect you with payment plans and assistance programs if you're having financial difficulties.

Learn energy savings tips and available resources at sdge.com/MyEnergy.



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All rights reserved. S2210032 M-2212 1222 704M

On Hold Messaging for Customer Care Center

In January and February, the on hold message was updated to provide customers with information about natural gas bills and available resources prior to connecting with a Customer Care Center representative.

January:

Winter 2023 – Front End IVR for Higher Natural Gas Prices

January 4, 2023

2023 Winter Message (117 words)

Thank you for calling SDG&E. We are currently experiencing high call volume. Are you calling regarding a higher-than-expected energy bill? On January first, SDG&E updated its pricing for electricity and natural gas. Nationwide, natural gas prices are at historic levels, and winter bills could soar due to the extraordinary market condition. We have resources and assistance programs to help. Visit sdge.com/assistance to learn more. You can also keep track of your energy use and avoid surprises on your bill with Energy Alerts. Log on to My Account to customize your preferences, all online and at your convenience. Otherwise, please remain on the line, and we'll be with you as soon as possible. We apologize for the wait.

Sample Press Releases



NEWS RELEASE

Media Contact: Anthony Wagner
San Diego Gas & Electric
858-649-3570
AWagner1@sdge.com
Twitter: [@sdge](https://twitter.com/sdge)

AMID SOARING NATURAL GAS PRICES NATIONWIDE, SDG&E OFFERS CUSTOMERS BILL-SAVING TIPS AND TOOLS

**Due to ongoing market volatility, residential natural gas rate increased
19% between November and December**

SAN DIEGO, December 13, 2022 – [As wholesale natural gas prices nationwide continue to soar higher](#) and as cold weather leads to higher gas usage for heating, San Diego Gas & Electric is offering customers tips and tools to help them save on their energy bill, while cautioning that natural gas prices could rise even higher into January



NEWS RELEASE

Media Contact: Anthony Wagner
San Diego Gas & Electric
858-649-3570
sdge.com
Twitter: [@sdge](https://twitter.com/sdge)

SDG&E ADOPTS NEW RATES IMPACTED BY HISTORICALLY HIGH NATURAL GAS PRICES AFFECTING CUSTOMERS NATIONWIDE

A wide range of assistance programs available to help

SAN DIEGO, January 4, 2023 –San Diego Gas & Electric implemented new natural gas and electric rates effective Jan. 1, 2023, that reflect the increasing costs of providing clean, safe and reliable energy services. The most significant contributor to the increases is the [ongoing, steep rise](#) in the natural gas market, which has impacted energy bills across the nation. Natural gas is not just used for heating and cooking, it's also used to generate 40% of this nation's electricity.



NEWS RELEASE

Media Contact: Anthony Wagner
San Diego Gas & Electric
858-649-3570
sdge.com
Twitter: [@sdge](https://twitter.com/sdge)

SDG&E ANNOUNCES FEBRUARY NATURAL GAS COMMODITY PRICE TO DECLINE 68% COMPARED TO JANUARY

Average natural gas bills in February expected to decrease by \$115

SAN DIEGO, January 31, 2023 – After hitting historic highs this winter due to unprecedented market conditions in the Western United States, San Diego Gas & Electric announced today that the February natural gas commodity price has declined by 68% percent compared to January 2023, plunging from \$3.45 per therm to \$1.11 per therm.

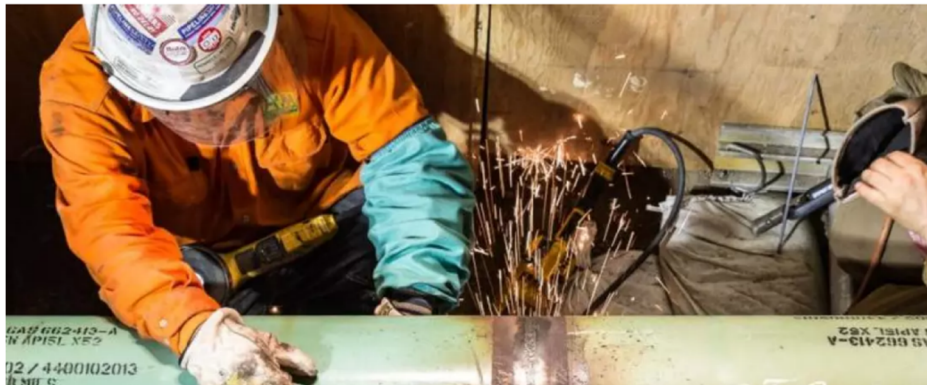
The typical residential customer’s gas bill (commodity plus delivery charges and other mandated fees and taxes) is expected to decrease to ~\$110 in February, from ~\$225 in January. Nevertheless, the average residential gas bill this February is still substantially

Sample News Stories



NEWS

Natural gas prices are way up, so brace for higher SDG&E bills

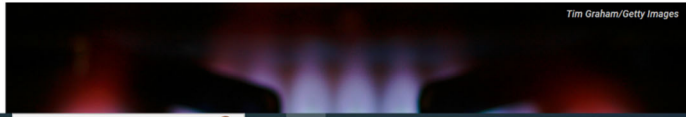


SAN DIEGO

SDG&E Offers Money Saving Tips Amid 19% Increase in Natural Gas Prices

If SDG&E pays SI for natural gas in the commodity market, that's what SDG&E customers pay, the company said

By City News Service • Published December 13, 2022 • Updated on December 13, 2022 at 2:30 pm



Tim Graham/Getty Images

Trending Stories

SAN DIEGO COUNTY BOARD OF SUPERVISORS
How Much Did San Diego Pay While Nathan Fletcher Allegedly Preyed on Staff?

LOCAL

SDG&E warns natural gas prices could rise into the new year

by: Jafet Serrato
Posted: Dec 13, 2022 / 12:59 PM PST
Updated: Dec 13, 2022 / 01:34 PM PST



The logo for San Diego Gas & Electric, or SDG&E, which provides natural gas service to San Diego County.



WORKING FOR YOU

SDG&E gas bills expected to more than double this month

"If it keeps going up, I don't know what I'm gonna do," said SDG&E customer, Tammy Smith.



Author: Shannon Handy
Published: 5:40 PM PST January 4, 2023
Updated: 5:41 PM PST January 4, 2023



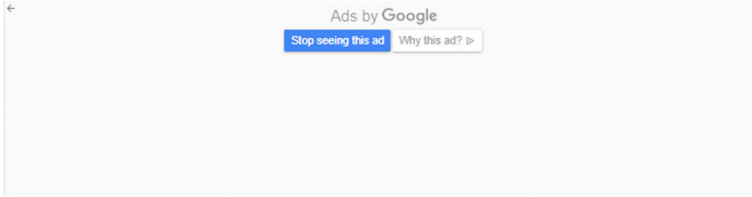
Ads by Google

Stop seeing this ad

Why this ad? >



Home » Life » This Article



LIFE

Natural Gas Prices Increasing 19% in Cold Weather, SDG&E Provides Tips to Save



by Debbie L. Sklar December 13, 2022

Share this:

The San Diego Union-Tribune

PODCASTS AND LIVESTREAMS

SDG&E natural gas prices will double in January. Here's what you need to know.



(U-1)

Get the story behind the story every day. Host Kristy Totten interviews Union-Tribune reporters, newsmakers and experts about what matters in San Diego.

BY KRISTY TOTTEN
JAN. 9, 2023 6:53 PM PT



SUBSCRIBERS ARE READING >



Social Media Sample Posts, including those shared by the CPUC and Local Elected Officials

Social Media – Exhibit

Organic social media campaign ran from December 2022 – February 2023 and connected customers to sdge.com/MyEnergy and the NewsCenter sdgenews.com. Our social media posts were RT'd by the CPUC and local elected officials.

California PUC Retweeted



SDG&E @SDGE · Jan 4

🔔 Rate transparency is something we take seriously. New rates are impacted by historically high natural gas prices affecting customers nationwide.

📱 We are offering customers bill-saving tips & tools at:

ow.ly/nYtn50MivoN

⚡ Additional resources: sdge.com/myenergy

The infographic is divided into two main columns. The left column features a large yellow bell icon with a red '1' inside, next to a calendar icon. Below this is an important message and four energy-saving tips: 'Lower the thermostat on your water heater', 'Keep your furnace clean', 'Wash with cold water', and 'Block the wind/cold'. The right column features a bar chart titled 'SDG&E NATURAL GAS RATE \$/therm' showing a significant increase in the 'Winter' period. Below the chart is another important message and two program descriptions: 'Level Pay Program' and 'Assistance Programs'.

Winter bills could soar due to extraordinary market conditions nationally

SDG&E NATURAL GAS RATE
\$/therm

Important message: Natural gas prices at historic high
Winter bills could soar due to extraordinary market conditions nationally

Lower the thermostat on your water heater

Keep your furnace clean

Wash with cold water


Block the wind/cold

Level Pay Program
Customers who wish to have more predictable bills month to month are encouraged to sign up for our Level Pay program at sdge.com/LPP.

Assistance Programs
We offer a variety of assistance programs, including bill discounts, debt relief, payment plans, energy efficiency programs at sdge.com/assistance.

California PUC Retweeted

 **SDG&E**  @SDGE · Jan 4

 Three things you should know about natural gas rates. Learn more at ow.ly/nYtn50MivoN.

Three things you should know *About natural gas rates*



Gas Prices Change Monthly

The price of natural gas is updated every month based on market conditions and is influenced by several factors including weather, usage, storage levels & more.



Cold Weather + Increased Use = Higher Bills

Residential natural gas use is typically highest in January when the weather in our region is usually the coldest.



We Don't Profit From Rising Market Prices

We do not mark up the cost of the gas we buy on the commodity market on behalf of our customers. If SDG&E pays \$1 to purchase natural gas, that's what you will pay too.

California PUC Retweeted

SDG&E @SDGE · Jan 6



🔔 Your natural gas questions answered. Learn more at ow.ly/nYtn50MivoN.

Your Questions Answered
Natural gas prices at historic high SDGE

While natural gas market prices may be lower elsewhere in the country, they remain elevated in the Pacific region where gas demand is high due to cold weather and low storage levels. There is a significant price differential between gas market prices on the East Coast and West Coast. It's also important to know that the current prices for gas that customers are seeing are for January only. Gas prices are updated monthly based on forecasted market conditions. If prices come down, customers will see that reflected on their bill. SDG&E does not make money from rising market prices. If we pay \$1 to buy gas in the market, that's what our customers pay.

California PUC Retweeted

SDG&E @SDGE · Jan 9



🔔 Below are a few tips to help you reduce your gas usage this winter.
📱 Learn more about the programs we have available to help our customers, including debt relief and bill discounts: sdge.com/assistance
⚡ Additional bill-saving tips: sdge.com/myenergy

Four Energy-Saving Tips For your home SDGE

- Lower the thermostat on your water heater
- Keep your furnace clean
- Wash with cold water
- Block the wind/cold

Here for you. Customer resources SDGE

- Level Pay Program**
Customers who wish to have more predictable bills month to month are encouraged to sign up for our Level Pay program at sdge.com/LPP.
- Assistance Programs**
We offer a variety of assistance programs, including bill discounts, debt relief, payment plans, and energy efficiency programs at sdge.com/assistance.
- Ways to Cut Your Winter Energy Bill**
We have created a dedicated webpage with tools and tips that could help customers reduce energy use at sdge.com/MyEnergy.

California PUC Retweeted



SDG&E @SDGE · Jan 10

Entirely funded by shareholder dollars, \$1 million is now available through our Neighbor-to-Neighbor (N2N) program that provides up to \$300 in one-time grants to help offset past-due bills for customers experiencing financial hardship. Learn more at ow.ly/b8i650Mn0QT.



SDG&E TO MAKE \$1 MILLION AVAILABLE TO HELP CUSTOMERS WITH UTILITY BILLS VIA NEIGHBOR-TO-NEIGHBOR PROGRAM

California PUC Retweeted



SDG&E @SDGE · Jan 10

\$1 millón de fondos de accionistas ahora están disponibles a través del programa Neighbor-to-Neighbor que ofrece subvenciones únicas de hasta \$300 para ayudar a compensar las facturas vencidas de los clientes que están experimentando dificultades financieras. ow.ly/luLa50Mn1VP



SDG&E DESTINARÁ \$1 MILLÓN PARA AYUDAR A LOS CLIENTES CON SUS FACTURAS DE SERVICIOS PÚBLICOS A TRAVÉS DEL PROGRAMA NEIGHBOR-TO-NEIGHBOR

California PUC Retweeted

SDG&E @SDGE · Jan 18




🔔 Take control of your energy bill this winter by reducing your gas usage with this tip.

📱 Here are ways we are helping our customers: sdge.com/assistance


⚡ Additional bill-saving tips: sdge.com/MyEnergy

💬 Natural gas prices FAQs: ow.ly/NpBA50Mua0L

Quick Energy-Saving Tip
Don't get burned by hot water



Lower the thermostat on your water heater to 120°F, if possible.

 Learn more, including bill saving and energy management resources at sdge.com/MyEnergy.

California PUC Retweeted

SDG&E @SDGE · Jan 19



🔔 Below are a few tips to help you reduce your gas usage this winter.

📱 Ways we are helping our customers, including assistance programs: sdge.com/assistance.

⚡ Additional bill-saving tips: sdge.com/MyEnergy.

💬 Natural gas prices FAQs: ow.ly/NpBA50Mua0L.

<p>Here for you. <i>Customer resources</i> </p>	<p>Four Energy-Saving Tips <i>For your home</i> </p>	
<p> Level Pay Program Customers who wish to have more predictable bills month to month are encouraged to sign up for our Level Pay program at sdge.com/LPP.</p>	<p> Lower the thermostat on your water heater</p>	<p> Keep your furnace clean</p>
<p> Assistance Programs We offer a variety of assistance programs, including bill discounts, debt relief, payment plans, and energy efficiency programs at sdge.com/assistance.</p>	<p> Wash with cold water</p>	<p> Block the wind/cold</p>
<p> Ways to Cut Your Winter Energy Bill We have created a dedicated webpage with tools and tips that could help customers reduce energy use at sdge.com/MyEnergy.</p>	<p> Learn more, including bill saving and energy management resources at sdge.com/MyEnergy.</p>	

California PUC Retweeted



SDG&E @SDGE · Jan 19



🔔 A continuación se presentan consejos para ayudarle a reducir su consumo de gas este invierno.

📱 Formas en que estamos ayudando a nuestros clientes:

sdge.com/assistance

⚡ Consejos para ahorrar: sdge.com/MiEnergia

💬 Preguntas frecuentes: ow.ly/xyjg50MucXf

Cuatro consejos para ahorrar energía en el hogar		Estamos aquí para usted. Recursos para clientes	
<p>Baje el termostato de su calentador de agua</p>	<p>Mantenga el horno limpio</p>	<p>Programa de Pago Nivelado (Level Pay) Se recomienda a los clientes que deseen recibir facturas más predecibles de un mes a otro a inscribirse en nuestro programa de pago nivelado (Level Pay) en sdge.com/LPP.</p>	
<p>Lave con agua fría</p>	<p>Bloquee el viento/frío</p>	<p>Programas de asistencia Ofrecemos varios programas de asistencia, como descuentos en facturas, condonación de deudas, planes de pago, programas de eficiencia energética y más en sdge.com/assistance.</p>	
<p>Obtenga más información y recursos para ayudarle a ahorrar en su factura y administrar su uso de energía en sdge.com/MiEnergia.</p>		<p>Formas de reducir su factura de invierno Hemos desarrollado una página web con herramientas y consejos que podrían ayudar a nuestros clientes a ahorrar: sdge.com/MiEnergia.</p>	

California PUC Retweeted

SDG&E @SDGE · Jan 23





🔔 Take control of your energy bill this winter by reducing your gas usage with this tip.

📱 Here are ways we are helping our customers: sdge.com/assistance

⚡ Additional bill-saving tips: sdge.com/MyEnergy

💬 Natural gas prices FAQs: ow.ly/NpBA50Mua0L

Quick Energy-Saving Tip
Keep your furnace clean



Check furnace filters once a month and replace them regularly.

💡 Learn more, including bill saving and energy management resources at sdge.com/MyEnergy.


California PUC Retweeted

SDG&E @SDGE · Jan 24



👉 Additional ways we are helping our customers: sdge.com/assistance.

💬 Natural gas prices FAQs: ow.ly/NpBA50Mua0L.



sdgenews.com
Have Questions about Natural Gas Prices? We've...
In recent days, we have received several questions about natural gas prices. We have answers to you...

California PUC Retweeted



SDG&E @SDGE · Jan 30

Here for you.

Here are ways we are helping our customers, including assistance programs: sdge.com/assistance

Additional bill-saving tips: sdge.com/MyEnergy

Natural gas prices FAQs: ow.ly/NpBA50Mua0L

Here for you.
Customer resources





Level Pay Program
Customers who wish to have more predictable bills month to month are encouraged to sign up for our Level Pay program at sdge.com/LPP.



Assistance Programs
We offer a variety of assistance programs, including bill discounts, debt relief, payment plans, and energy efficiency programs at sdge.com/assistance.




Ways to Cut Your Winter Energy Bill
We have created a dedicated webpage with tools and tips that could help customers reduce energy use at sdge.com/MyEnergy.

California PUC Retweeted

SDG&E @SDGE · Jan 31



🔔 After hitting a historic high in January due to unprecedented natural gas market conditions in the Western U.S., today we announce that the February natural gas commodity price has declined by 68% percent compared to January 2023: ow.ly/5wXn50MF45y.



SDG&E ANNOUNCES FEBRUARY NATURAL GAS COMMODITY PRICE TO DECLINE 68% COMPARED TO JANUARY

ALT

California PUC Retweeted

SDG&E @SDGE · Feb 2



🔔 Following a decision made today by the [@californiapuc](https://twitter.com/californiapuc), 2 of the 3 scheduled installments of the CA Climate Credit have been moved up to provide winter bill relief to SDG&E customers: ow.ly/6ojZ50MHi2U.



CA CLIMATE CREDIT MOVED UP TO PROVIDE WINTER BILL RELIEF TO SDG&E CUSTOMERS

ALT

California PUC Retweeted



SDG&E @SDGE · Feb 6

Residential customers with natural gas service will see a \$43.40 credit on their February bill. Learn more about the CA Climate Credit, how you're helping to fight climate change and when the next climate credit is expected to hit your bill this year at ow.ly/6ojZ50MHi2U.



🔄 Councilmember Jennifer Campbell Retweeted



SDG&E @SDGE · Jan 31

🔔 After hitting a historic high in January due to unprecedented natural gas market conditions in the Western U.S., today we announce that the February natural gas commodity price has declined by 68% percent compared to January 2023: ow.ly/5wXn50MF45y.



SDG&E ANNOUNCES FEBRUARY NATURAL GAS COMMODITY PRICE TO DECLINE 68% COMPARED TO JANUARY

ALT

🔄 Councilmember Jennifer Campbell Retweeted



SDG&E @SDGE · Feb 2

🔔 Following a decision made today by the [@californiapuc](https://twitter.com/californiapuc), 2 of the 3 scheduled installments of the CA Climate Credit have been moved up to provide winter bill relief to SDG&E customers: ow.ly/6ojZ50MHi2U.



CA CLIMATE CREDIT MOVED UP TO PROVIDE WINTER BILL RELIEF TO SDG&E CUSTOMERS

ALT

↻ Councilmember Jennifer Campbell Retweeted



SDG&E @SDGE · Feb 27



💙💛💚 Today, we are proud to announce that we are providing \$16 million in shareholder funding to help customers with bill assistance & bolster community resources for residents who may be struggling financially. ow.ly/z7vY50N3zkC



**SDG&E
ANNOUNCES
\$16 MILLION IN
RELIEF**

FOR CUSTOMERS AND COMMUNITY
ASSISTANCE FUNDING

Councilmember Jennifer Campbell Retweeted



SDG&E @SDGE · Feb 28

🚨 After hitting a historic high in Jan. due to unprecedented natural gas market conditions in the West, today we announce that the March natural gas commodity price has declined by ~ 83% compared to Jan., plunging from \$3.45 per therm to \$0.60 per therm. ow.ly/MBvs50N5j4I



**SDG&E ANNOUNCES MARCH
NATURAL GAS COMMODITY
PRICE TO DECLINE BY ~ 83%
COMPARED TO JANUARY**

💬 10

🔄 5

❤️ 13

📊 3,974




Bilingual (ENG/SPA) Social Media CBO Tool Kit:



SDG&E Community Partners: Social Media Toolkit
Socios de la comunidad SDG&E: Kit de herramientas para redes sociales

We have many SDG&E, federal, state and local assistance programs to help with your monthly utility bills

While the decline in natural gas commodity cost is welcome news, we recognize that many customers are still struggling with high bills. We continue to work diligently to connect customers with assistance programs and develop solutions to provide financial relief. 

As a trusted community partner, we thank you in advance for sharing these social media posts with your audience to help amplify a wide range of customer assistance programs and resources that are available to help your clients/constituency manage their energy bill.

In your posts, please feel free to tag us on our social media accounts found below and route your audience to sdge.com/assistance for more information.

--- --- ---

Tenemos muchos programas de asistencia SDG&E, federales, estatales y locales para ayudarlo con sus facturas mensuales de servicios públicos

Aunque la reducción en el costo del producto básico de gas natural es una buena noticia, reconocemos que muchos de nuestros clientes todavía están luchando con facturas altas. Continuamos trabajando con diligencia para conectar a los clientes con programas de asistencia disponibles y desarrollar soluciones para brindar alivio financiero.

Como socio comunitario confiable, le agradecemos de antemano por compartir estas publicaciones en las redes sociales con su audiencia para ayudar a amplificar una amplia gama de programas de asistencia y recursos que están disponibles para ayudar a sus clientes y constituyentes a administrar su factura de energía.

En sus publicaciones, no dude en etiquetarnos en nuestras cuentas de redes sociales que se encuentran a continuación y dirigir a su audiencia a sdge.com/assistance para obtener más información.

If you have any questions, please don't hesitate to contact Rick Cervantes at rcervant@sdge.com.

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[/SANDIEGOGASANDLECTRIC](https://www.facebook.com/SANDIEGOGASANDLECTRIC)



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Sample Posts

1. 📢 A message from our community partner, @SDGE: We recognize that many customers are still struggling with high bills, and we continue to work diligently to connect customers with assistance programs & develop solutions to provide financial relief. Here are a few of our assistance programs that are available to you. Learn more at sdge.com/assistance.

📢 Un mensaje de nuestro socio comunitario, @SDGE: Reconocemos que muchos clientes todavía están luchando con facturas altas y seguimos trabajando diligentemente para conectar a los clientes con programas de asistencia y desarrollar soluciones para brindar alivio financiero. Estos son algunos de nuestros programas de asistencia que están disponibles para usted. Obtenga más información en sdge.com/assistance.

English Graphic (Please feel free to include additional customer assistance program social media graphics from the appendix found at the end of the document.):

We are here for you.
Assistance programs

Neighbor-to-Neighbor Fund	CARE - Save up to 30% on your electric & gas bill
FERA - Save 18% on your electric bill	LIHEAP Federal Utility Assistance
More Time to Pay Your Bill	Debt Forgiveness

See if you qualify & learn more at sdge.com/assistance.

Spanish Graphic (No dude en incluir imágenes de redes sociales adicionales de programas de asistencia en el apéndice que se encuentra al final del documento.):

Estamos aquí para usted.
Programas de asistencia

Fondos del programa Neighbor-to-Neighbor	CARE - Ahorre hasta un 30% en su factura de electricidad y gas
FERA - Ahorre un 18% en su factura de electricidad	Asistencia financiera federal a través de LIHEAP
Más tiempo para pagar su factura	Condonación de deudas

Vea si califica y obtenga más información en sdge.com/assistance.

2. 📢 A message from our community partner, @SDGE: Under the federally funded Low-Income Home Energy Assistance Program (LIHEAP), about \$10 million is available to help SDG&E customers who are past due on their bill payments. About \$7 million of that amount was allocated for 2021-2022 and is expected to expire by June 30, 2023. See if you qualify and learn more at sdge.com/LIHEAP.

📢 Un mensaje de nuestro socio comunitario, @SDGE: Bajo el Programa de Asistencia de Energía para Hogares de Bajos Ingresos (LIHEAP, por sus siglas en inglés), financiado con fondos federales, cerca de \$10 millones están disponibles para ayudar a los clientes de SDG&E que están atrasados en el pago de sus facturas. Aprox. \$7 millones de esa cantidad se asignaron para el 2021 al 2022 y se espera que expiren el 30 de junio de 2023. Vea si califica y obtenga más información en sdge.com/LIHEAP.

English Graphic:



We are here for you.
Assistance programs



LIHEAP Federal Utility Assistance

Families in need may qualify for financial assistance toward their past-due energy bills under the Low-Income Home Energy Assistance Program (LIHEAP).

See if you qualify & learn more at sdge.com/LIHEAP.

Spanish Graphic:



Estamos aquí para usted.
Programas de asistencia



Asistencia del programa federal LIHEAP

Familias que están luchando para pagar sus facturas de energía vencidas pueden calificar para recibir asistencia financiera bajo el Programa de Asistencia de Energía para Hogares de Bajos Ingresos (LIHEAP, por sus siglas en inglés).

Vea si califica y obtenga más información en sdge.com/LIHEAP.

3. 📢 A message from our community partner, @SDGE: We continue to work diligently to connect customers with assistance programs and develop solutions to provide financial relief like the Neighbor-to-Neighbor Fund. Learn more at sdge.com/assistance.

📢 *Un mensaje de nuestro socio comunitario, @SDGE: Continuamos trabajando con diligencia para conectar a los clientes con programas de asistencia disponibles y desarrollar soluciones para brindar alivio financiero como el fondo de vecino a vecino. Obtenga más información en sdge.com/assistance.*

English Graphic:



We are here for you.
Assistance programs



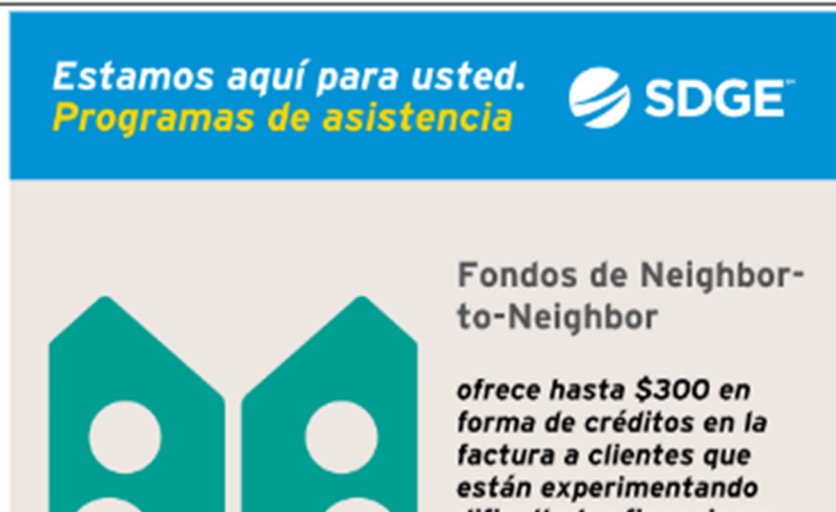
Neighbor-to-Neighbor Fund




Provides up to \$300 toward your SDG&E bill for customers who are experiencing temporary financial hardship but are not eligible for other state and federal assistance.

See if you qualify & learn more at sdge.com/assistance.


Spanish Graphic:



Estamos aquí para usted.
Programas de asistencia



Fondos de Neighbor-to-Neighbor



ofrece hasta \$300 en forma de créditos en la factura a clientes que están experimentando

SDGE News articles posted to sdgenews.com

The following articles and corresponding were posted to SDG&E’s News center webpage, which is accessible on sdge.com or directly at sdgenews.com.

Publication Date	Headline
June 22, 2022	Energy Market Trend: Natural Gas Prices Continue to Rise SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post #1 • Social Media Post #2-
Dec 13, 2022	Amid Soaring Natural Gas Prices Nationwide, SDG&E Offers Customers Bill-Saving Tips and Tools SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1 (English / Spanish)
Jan 3, 2023	SDG&E Adopts New Rates Impacted By Historically High Natural Gas Prices Affecting Customers In The Pacific Region SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1 • Social Media Post Example #2
Jan 4, 2023	SDG&E adopta nuevas tarifas afectadas por precios históricamente altos del gas natural que afectan a clientes en el oeste del país SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1 • Social Media Post Example #2
Jan 13, 2023	SDG&E’s Commentary in the San Diego Union-Tribune Outlines Reasons for High Bills and Customer Assistance Programs SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1
Jan 17, 2023	Have Questions about Natural Gas Prices? We’ve Got Answers SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1 (English / Spanish) • Social Media Post Example #2 (English / Spanish)
Jan 31, 2023	SDG&E Announces February Natural Gas Commodity Price To Decline 68% Compared To January SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1
Jan 31, 2023	SDG&E anuncia que el precio del producto básico del gas natural de febrero disminuirá un 68% en comparación con enero SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1

Feb 16, 2023	SDG&E Provides Update On Natural Gas Prices – Critical Out-Of-State Pipeline Service Restored SDGE San Diego Gas & Electric - News Center (sdgenews.com) <u> </u>
Feb 28, 2023	SDG&E Announces March Natural Gas Commodity Price To Decline By ~ 83% Compared To January SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1
Feb 28, 2023	SDG&E anuncia que el precio del producto básico del gas natural de marzo disminuirá aprox. un 83% en comparación con enero SDGE San Diego Gas & Electric - News Center (sdgenews.com) <ul style="list-style-type: none"> • Social Media Post Example #1

LIHEAP and Neighbor to Neighbor (N2N) programs

The following summary tables below provide more details regarding the increases for both the LIHEAP and NTN programs:

LIHEAP Pledge Counts (cumulative)

Month	2022	2023	% Difference
January	503	490	-2.6
February	873	1,272	+45.7
March	1,456	2,079	+42.8

LIHEAP Pledge Amount (cumulative)

Month	2022	2023	% Difference
January	\$399,622	\$444,170	+11.1
February	\$635,114	\$1,087,589	+71.2
March	\$1,014,278	\$1,853,213	+82.7

NTN Pledge Counts (cumulative)

Month	2022	2023	% Difference
January	19	69	+263.2
February	44	129	+193.2
March	66	505	+665.2

NTN Pledge Amount (cumulative)

Month	2022	2023	% Difference
January	\$3,134	\$19,492	+522.0
February	\$7,086	\$37,895	+434.8
March	\$10,235	\$223,402	+2,082.7