

Joseph Mock Director Regulatory Affairs

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October 24, 2022

Rachel Peterson Executive Director California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

## Subject: Request for Extension of Time to Comply with the Assigned Commissioner's Scoping Memo and Ruling Related to the Ventura Compressor Modernization Project Application Requirement

Dear Ms. Peterson:

Pursuant to Rule 16.6 of the California Public Utilities Commission's (Commission or CPUC) Rules of Practice and Procedure, Southern California Gas Company (SoCalGas) requests an extension of time to comply with the Assigned Commissioner's Scoping Memo and Ruling issued October 3, 2022, in Application (A.) 22-05-015 (consolidated), SoCalGas's Test Year (TY) 2024 General Rate Case (GRC) proceeding, related to the Ventura Compressor Modernization (VCM) Project application requirement.

## **Background**

SoCalGas filed its TY 2024 GRC Application, A.22-05-006 (consolidated) on May 16, 2022. Among other things, SoCalGas included within the scope of its GRC request its VCM Project. In the Assigned Commissioner's Scoping Memo and Ruling addressing SoCalGas's TY 2024 GRC Application, issued on October 3, 2022, the Commission found that the VCM Project should be reviewed in a separate application rather than in the current GRC application. The Scoping Memo noted that a determination on SoCalGas's preferred alternative is needed as soon as possible, and that moving the evaluation of the VCM Project into a separate proceeding will be a more efficient way to review and resolve the specific issues outside of the extended GRC timeline. Therefore, SoCalGas was directed to file a separate formal application for its VCM Project with its preferred project alternative within 45 days of the issuance of the Scoping Memo (i.e., by November 17, 2022). This new application was directed to include information on SoCalGas's detailed feasibility analysis of alternative sites and equipment configurations, including emissions profiles of the alternatives studied, if applicable,

supporting documents on its preferred project alternative, and the facility's revenue requirement, rate treatment, and regulatory accounting.

SoCalGas was additionally directed to confirm within 10 days of the Scoping Memo's issuance whether SoCalGas would in fact file a separate application regarding the VCM Project, as well as to provide a list of exhibits, testimony, and exhibits submitted as part of the GRC application that include information on the VCM Project. SoCalGas complied with this requirement on October 13, 2022.

## Extension Request for VCM Project Application Requirement

As noted above, the Scoping Memo ordered SoCalGas to file the VCM Project application by November 17. Preparing a well-developed application in the manner directed with supporting testimony and workpapers will require a substantial amount of time and effort. While we agree that a determination on SoCalGas's preferred alternative is needed as soon as possible, it is our intent to submit a comprehensive application for the Commission's review. As noted in our October 13, 2022 compliance filing, and reiterated herein, SoCalGas requests a modest extension of time – to December 15, 2022 – to comply with the directive to file the VCM Project application.<sup>1</sup>

Because the VCM Project is now effectively outside the scope of the TY 2024 GRC, it is not clear if the presiding officer has the authority to authorize this extension of time request. Therefore, SoCalGas submits this request to you under Rule 16.6 to ensure the request may be properly addressed.

SoCalGas has notified the CPUC's Energy Division of this extension request.

Thank you for your consideration.

Sincerely,

<u>/s/ Joseph Mock</u> Joseph Mock Director - Regulatory Affairs

cc: <u>aljextensionrequests@cpuc.ca.gov</u> <u>EDTariffUnit@cpuc.ca.gov</u> Service List A.22-05-015/A.22-05-016

<sup>&</sup>lt;sup>1</sup> On October 19, 2022, the City of Buenaventura filed a Motion in the TY 2024 GRC proceeding which, among other things, supported SoCalGas's request to file the VCM Project Application by December 15, 2022. The Motion seeks additional relief that appears to go beyond the scope of the Scoping Memo and Ruling; SoCalGas has responded to that Motion within the proceeding.