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PREPARED DIRECT TESTIMONY OF EDUARDO MARTINEZ
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY
AND SAN DIEGO GAS & ELECTRIC COMPANY
(WEATHER DESIGN)

September 30, 2025

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1 **CHAPTER 2**

2 **PREPARED DIRECT TESTIMONY OF EDUARDO MARTIENZ**

3 **(WEATHER DESIGN)**

4 **I. PURPOSE**

5 The purpose of my prepared direct testimony is to present the weather design used in the
6 forecasts of Southern California Gas Company's (SoCalGas) and San Diego Gas & Electric
7 Company's (SDG&E) weather-sensitive gas market segments.

8 **II. SOCALGAS WEATHER DESIGN**

9 This section discusses the temperature assumptions that underline the forecasts for gas
10 demand for SoCalGas's temperature-sensitive market segments and presents the temperature
11 design values for average year and cold year weather. This section also discusses the
12 temperature design values used to forecast peak day gas demand for the temperature-sensitive
13 market segments.

14 **A. SoCalGas Average Year and Cold Year Weather Design**

15 Temperature variations can cause significant changes in winter gas demand due to space
16 heating, particularly in the residential and commercial markets. Recognizing this, the gas
17 demand forecasts are prepared for two temperature designs—average and cold—to quantify
18 changes in demand due to cold weather. SoCalGas creates these temperature designs using the
19 concept of a Heating-Degree-Day (HDD),¹ a measure of the coldness of a month or year. One

¹ For SoCalGas, daily values of system-wide average temperatures are calculated from a six-zone temperature monitoring procedure. From this daily system average temperature data, a corresponding daily value of Heating Degrees (HD) is computed from the formula, $HD = \max\{0, 65-T\}$, where T is the daily system average temperature. For each calendar month, the accumulated number of HD is determined, upon which an annual total is calculated. Accumulated values of HD for a specified number of days (>1) are called Heating-Degree-Days (HDD).

1 HDD is accumulated, daily, for each degree that the daily average temperature is below 65
2 degrees Fahrenheit (°F).

3 The Average Year and Cold Year scenarios are calculated and defined in terms of HDD.
4 In this cost allocation proceeding (CAP), SoCalGas has included a climate warming trend that
5 gradually reduces HDDs over the forecast period.² First, average temperature year values were
6 computed as the simple average of annual HDDs for the calendar years 2005 through 2024:
7 1,239 HDD's for SoCalGas. Corresponding 1-in-35 cold year HDDs were 1,465 for SoCalGas.
8 For the forecast period, projected annual HDDs were reduced each year by 7 HDD's. Projected
9 average year and cold year HDDs both drop by 7 annually: from 1,232 and 1,458 in year 2025,
10 to 1,197 and 1,423 in year 2030. The annual reductions are based on the latest 20-year trend in
11 20-year-averaged HDD's. That is, they are based on the observed trend in changes starting with
12 average HDDs for years 1986-2005, then 1987-2006, then 1988-2007, and so on, ending with the
13 average HDDs for years 2005-2024.

14 The Cold Year HDD value is calculated according to the criterion that it is expected to be
15 exceeded with an average frequency of once out of every 35 years. Based on this criterion, the
16 Cold Year HDD value is calculated as 2.025 standard deviations more than the Average Year
17 HDD. The resulting SoCalGas Cold Year HDD value is 1,465 HDD. In this CAP, the standard
18 deviation has been calculated using an approach that compensates for the annual HDD values for
19 the years 2014-2018 in SoCalGas's service territory being dramatically lower than in any
20 preceding year going back to 1950. Ignoring this warm weather and using a typical standard

² SoCalGas and SDG&E proposed the similar climate warming trend assumptions in the 2024 Cost Allocation Proceeding (Application (A.) 22-09-015) and the warming trend was adopted by the Commission.

deviation calculation³ for HDD based on the 20-year period (2005-2024) produces a standard-deviation number that is excessively large,⁴ leading to an unrealistically high Cold Year HDD value. Instead, the standard deviation proposed for this CAP is calculated based on an HDD dataset that controls for the warm weather regime that lasted from 2014 to 2018.⁵ In this dataset, the annual HDD values for the years 2014-2018 have been adjusted higher to account for a shift in the level of annual HDD⁶ and then combined with the unadjusted, actual annual HDD values for the preceding years 2005-2013 and succeeding years 2019-2024. The standard deviation

³ The typical calculation for the standard deviation is:

$$\text{standard deviation} = \sqrt{\frac{1}{n-1} \sum_{i=1}^n (x_i - \bar{x})^2}$$

⁴ SoCalGas's typical standard deviation calculation for the 20 years before the warm weather regime (years 1994-2013), results in a standard deviation of 145.1. The same calculation for the most recent 20 years (years 2005-2024), results in a standard deviation of 204.6, an increase of 41%. Using this approach would therefore imply that, on an annual basis, cold weather had become much more volatile since 2013.

⁵ The same approach to control warm weather regime from 2014 to 2018 when estimating standard deviation was proposed by SoCalGas in A.22-09-015 and was adopted by the Commission.

⁶ A regression with a time trend and a dummy variable for the years 2014-2018 has been used to estimate the shift in the level of annual HDD that occurred from 2014 to 2018. A dummy variable takes the value one for some observations to indicate the presence of an effect or membership in a group and zero for the remaining observations. Estimating the effect of the dummy variable gives an estimate of that effect or the impact of membership in that group. A dummy variable is used here to estimate the average effect on annual HDD of a given year having membership in the group of years 2014-2018. The dataset is SoCalGas system-wide annual HDD for the years 2005-2024. The regression equation is:

$$HDD_t = \alpha + \beta * t + \beta_{2014-2018} * D_{2014-2018} + \varepsilon$$

where $D_{2014-2018}$ is a dummy variable for the years 2014-2018 and $\beta_{2014-2018}$ is the corresponding dummy coefficient. This regression equation estimates average HDD over the period 2005-2024 controlling for time trends in HDD and the warm weather regime of years 2014-2018. It's important to note that p-value for the estimate of $\beta_{2014-2018}$ is 0.001% indicating an extremely low probability that membership in the group of years 2014-2018 had no effect on annual HDD's.

The dummy variable's estimated effect, $\beta_{2014-2018}$, is subtracted from the actual annual HDD data for years 2014-2018 to adjust the data to remove the level shift.

calculation has been performed using this adjusted dataset.⁷ Finally, this standard deviation estimate is multiplied by 2.025, as previously described, and added to the Average Year HDD value to arrive at the Cold Year HDD value of 1,465 HDD.

Monthly rounded HDDs for the starting-point Cold Year and Average Year Designs are shown below in Table 1.⁸ These figures are reduced by 7 HDD per year through the forecast period, with the monthly reductions made proportionally to the monthly HDD's shown in Table EM-1.

**Table EM 1:
SoCalGas Heating Degree Days Weather Design (for year 2024)**

	Cold Year	Average Year
	1-in-35	1-in-2
Month	Design	Design⁹
January	307.9	260.4
February	261.6	221.2
March	207.6	175.6
April	116.9	98.9
May	55.7	47.1
June	11.1	9.3
July	2.2	1.9
August	1.7	1.4
September	5.0	4.2
October	29.1	24.6
November	141.9	120.0
December	324.3	274.3
	1,465	1,239

⁷ The resulting standard deviation is 111.7.

⁸ The monthly starting-point values for Average Year HDD were calculated as the arithmetic average of the respective month's 20 years of observed monthly HDD. The monthly values for the Cold Year HDD were calculated by multiplying a proportion for each calendar month times the Cold Year HDD annual value. The proportion for each calendar month is that month's HDD total relative to the annual HDD total based on the Average Year data.

⁹ SoCalGas also refers to the Average Year HDD data (monthly or annual) as a "1-in-2" design because the average or expected value has the characteristic that there is a 50% (*i.e.*, 1-in-2) chance of observing a larger value.

B. SoCalGas Peak Day Temperature Designs

SoCalGas plans and designs its system to provide continuous service to its core (retail and wholesale) customers under an extreme peak day event.¹⁰ The extreme peak day design criterion is defined as a 1-in-35-year event;¹¹ this corresponds to a system average temperature of 40.6°F, or 24.4 HDDs, on a peak day. Although the gas demand for most of SoCalGas's noncore retail markets is not HDD-sensitive, the noncore commercial segment does exhibit a small but statistically significant HDD load sensitivity. For such SoCalGas noncore markets, SoCalGas uses a less extreme, but more frequent, 1-in-10-year likelihood peak day temperature¹² of 42.3°F, or 22.7 HDDs.

III. SDG&E WEATHER DESIGN

This section discusses the temperature assumptions that underlie the forecasts for gas demand for SDG&E's temperature-sensitive market segments and presents the temperature design values for average year and cold year weather. It also discusses the temperature design values that are used to forecast the peak day gas demand for SDG&E's temperature-sensitive market segments.

A. SDG&E's Average Year and Cold Year Weather Design

As with SoCalGas, the core demand forecasts for SDG&E are prepared for two temperature designs —average and cold—to quantify changes in space heating demand due to weather. HDDs for SDG&E are defined similarly as for SoCalGas but use a daily system-

¹⁰ The temperature SoCalGas uses to define a peak day is determined from an analysis of the annual minima of SoCalGas's daily system-average temperatures. These temperatures are used to estimate a probability model for the annual minimum daily temperature. The extreme peak day temperature value is determined from a calculation using this estimated model such that the chance we would observe a lower value than this extreme peak day temperature is 1/35 or about 2.86%.

¹¹ System planning criterion ordered by Decision (D.) 02-11-073.

¹² System planning criterion ordered by D.02-11-073.

1 average temperature calculated from an average of three weather station locations in SDG&E's
2 service territory.

3 The Average and Cold Year scenarios for SDG&E are calculated using the same
4 methodologies used for SoCalGas. SDG&E has also included a climate warming trend that
5 gradually reduces HDDs by 6 per year over the forecast period. First, the average temperature
6 year value was computed as the simple average of annual HDDs for the calendar years 2005
7 through 2024: 1,179 HDDs for SDG&E. Like SoCalGas, SDG&E's service territory
8 experienced an unusual warm weather regime from 2014 to 2018. To address this anomaly, the
9 SDG&E Cold Year scenario was calculated using the same approach as for SoCalGas.¹³ The
10 resulting 1-in-35 Cold Year HDDs are 1,437 for SDG&E: 258 HDDs higher than for the
11 Average Year. With the assumed warming trend, projected average year and cold year HDDs
12 were then both set to drop by 6 HDDs annually: from 1,173 and 1,431 in year 2025, to 1,143 and
13 1,401 in year 2030.

14 Monthly starting-point HDD values¹⁴ are shown in Table EM-2. These figures are
15 reduced by 6 HDDs per year through the forecast period, with the monthly reductions made
16 proportionally to the monthly HDD's shown in Table EM-2.

¹³ The same approach to control warm weather regime from 2014 to 2018 when estimating standard deviation was proposed by SDG&E in A.22-09-015 and was adopted by the Commission.

¹⁴ The monthly starting-point values for Average Year HDD were calculated as the arithmetic average of the respective month's 20 years of observed monthly HDD. The monthly values for the Cold Year HDD were calculated by multiplying a proportion for each calendar month times the Cold Year HDD annual value. The proportion for each calendar month is that month's HDD total relative to the annual HDD total based on the Average Year data.

**Table EM-2:
SDG&E Heating Degree Days Weather Design (for year 2024)**

	Cold Year	Average Year
Month	1-in-35 Design	1-in-2 Design
January	300.5	246.6
February	262.3	215.2
March	215.0	176.4
April	127.3	104.4
May	60.7	49.8
June	10.1	8.3
July	0.6	0.5
August	0.2	0.1
September	1.2	1.0
October	23.5	19.3
November	128.5	105.4
December	307.0	251.9
	1,437	1,179

B. SDG&E's Peak Day Temperature Designs

SDG&E plans and designs its system to provide continuous service to its core customers under an extreme peak day event.¹⁵ The extreme peak day design criterion is defined as a 1-in-35 annual event; this corresponds to a system average temperature of 43.6°F, or 21.4 HDD, on a peak day. Like SoCalGas's noncore commercial segment, SDG&E's noncore commercial segment exhibits a small but statistically significant HDD load sensitivity. SDG&E uses a less extreme, but more frequent, 1-in-10-year likelihood peak day temperature of 45.0°F, or 20.0 HDDs.

This concludes my prepared direct testimony.

¹⁵ The temperature SDG&E uses to define a peak day is determined from an analysis of the annual minima of SDG&E's daily system-average temperatures in order to estimate a probability model for the annual minimum daily temperature. The extreme peak day temperature value is determined from a calculation using this estimated model such that the chance we would observe a lower value than this extreme peak day temperature is 1/35 or about 2.86%.

1 **IV. QUALIFICATIONS**

2 My name is Eduardo Martinez. I am employed by SoCalGas as a Gas Demand Forecast
3 Manager. My business address is 555 West Fifth Street, Los Angeles, California, 90013-1011. I
4 received a Bachelor's degree in International Business from California State University Fullerton
5 and Master's degree in Economics from California State University Long Beach. Prior to
6 SoCalGas, I worked in economist and load forecasting positions at Southern California Edison,
7 Moody's Analytics, Los Angeles County Economic Development Corporation, State
8 Department, and Bureau of Labor Statistics.

9 I have not previously testified before the Commission.