SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)
(3rd DATA REQUEST FROM THE INDICATED PRODUCERS)

QUESTION 1:

The GAS Market OIR Report on Receipt Point Utilization dated April 16, 2012 ("Report") has slightly different zonal capacity values ("Available Capacity") as compared to the zonal values set forth in Schedule No. G-BTS ("Total Transmission Zone Firm Access"). Please explain the reason for the differences and state if G-BTS values should be updated with the values listed in the Report

RESPONSE 1:

No, there is no need to restate the firm zonal access values provided in the G-TBS tariffs. The G-TBS tariffs set forth firm zonal access values of 1210, 1590, 765 and 310 MMcf/d for Southern zone, Northern zone, Wheeler Ridge zone, and California zone, respectively. These values, restated in dths using 2010 conversion values, are presented in the Gas Market OIR Reports as "firm capacities" for each zone. Utilization factors are derived in that report by dividing daily scheduled quantities (in dths) by these firm zonal capacities.

The Gas Market OIR Report does not provide a different set of "available capacities". Instead, in two footnotes the report simply notes that firm capacity was not "available" during certain force majeure events and that a small amount of "other" LA Basin California capacity was "available" in addition to the 310 MMcfd (357 Mdth/d) of Line 85/Coastal firm capacities.

QUESTION 2:

Please explain why the G-BTS tariff has different zonal areas and how the Total Transmission Zone Firm Access capacity values set forth in Schedule G-BTS were determined for each zone. As part of this response, explain why the Southern, Northern and Wheeler values are less than the sum of the Specific Points of Access for these zones.

RESPONSE 2:

The G-BTS tariff zonal values were established in D.06-12-031 and more recently reaffirmed in AL 3706-A. The logic of the zonal areas is that receipts in one zonal area do not significantly affect the system's ability to take receipts in another zone.

Within a zone, however, the ability to take receipts at one point may be influenced by the level of receipts at another receipt point within that zone. This effect is illustrated by the fact that Southern, Northern and Wheeler values are less than the sum of the Specific Points of Access for that zone. Underlying these zonal constraints are facility constraints downstream of the receipt points in those zones.

QUESTION 3:

Please explain under what circumstances the daily receipts for a particular zone can exceed the Total Transmission Zone Firm Access capacity value.

RESPONSE 3:

The Gas Market OIR Report on Receipt Point Utilization dated April 16, 2012 clearly shows that this does not happen in any of the zones except for Wheeler Ridge.

The Wheeler Ridge firm capacity value is based on conservative assumptions, especially with regard to the pressures of the upstream pipes (Kern/Mojave & PG&E) that feed into that zone. On some days when pressures from those upstream pipes exceed the conservative assumptions used to set the 365-day firm capacity value reflected in the G-TBS tariffs, SoCalGas can make up to 100 MMdth/day available in addition to the firm 792 MMdth/day figure.