

**SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)
(4th DATA REQUEST FROM INDICATED PRODUCERS)**

QUESTION 1:

Your data response 5.3.3 to the 1st Data Request Set from Indicated Producers states: “SoCalGas/SDG&E designate a pipeline as backbone or local transmission based solely on its function.” Your data response 5.3.4 to the 1st Data Request Set from Indicated Producers, which asked for “objective criteria” for distinguishing backbone from local transmission, states: “SoCalGas/SDG&E’s engineers are familiar with the design, operation, and flow of the gas transmission system, and are able to classify each pipeline as performing the backbone or local transmission function.” As used in those data responses,

- 1.1 Please identify and describe in detail each function, characteristic, attribute or criterion used by SoCalGas/SDG&E to designate a pipeline as local transmission.
- 1.2 Please identify and describe in detail each function, characteristic, attribute or criterion used by SoCalGas/SDG&E to designate a pipeline as backbone transmission.
 - 1.2.1 Admit or deny that a function of backbone transmission is to provide long-haul transportation.
- 1.3 Does SoCalGas/SDG&E consider “design, operation, and flow” to be objective criteria?
- 1.4 Is “function” considered by SoCalGas/SDG&E to be different from the specific criteria listed in response 5.3.4, “design, operation, and flow”?
 - 1.4.1 If yes, how does function differ from design?
 - 1.4.2 If yes, how does function differ from operation?
 - 1.4.3 If yes, how does function differ from flow?

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RESPONSE 1:

- 1.1 Please refer page 7 of the Supplemental Direct Testimony of David Bisi in A.11-11-002.
- 1.2 Please refer to Response 1.1 of this data request.
- 1.2.1 SoCalGas/SDG&E are unable to provide a response as “long-haul transportation” as it pertains to the SoCalGas/SDG&E system is undefined. Please refer Response 1.1 of this data request for the functional definition of backbone transmission pipelines on the SoCalGas/SDG&E system.
- 1.3 Yes.
- 1.4 The design, operation, and flow of a pipeline are component characteristics of its function in the transmission system network.
 - 1.4.1 Please refer to Response 1.4 of this data request.
 - 1.4.2 Please refer to Response 1.4.1 of this data request.
 - 1.4.3 Please refer to Response 1.4.2 of this data request.

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QUESTION 2:

Your data response 5.3.4 to the 1st Data Request Set from Indicated Producers, which asked for “objective criteria” for distinguishing backbone from local transmission, states: *“SoCalGas/SDG&E’s engineers are familiar with the design, operation, and flow of the gas transmission system, and are able to classify each pipeline as performing the backbone or local transmission function.”* What is the SoCalGas/SDG&E design standard or criterion for local transmission?

RESPONSE 2:

SoCalGas/SDG&E have no such design standard or criteria.

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QUESTION 3:

Your data response 5.3.4 to the 1st Data Request Set from Indicated Producers, which asked for “objective criteria” for distinguishing backbone from local transmission, states: *“SoCalGas/SDG&E’s engineers are familiar with the design, operation, and flow of the gas transmission system, and are able to classify each pipeline as performing the backbone or local transmission function.”* What is the SoCalGas/SDG&E design standard or criterion for backbone transmission?

RESPONSE 3:

Please refer to Response 2 of this data request.

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QUESTION 4:

Please explain the reason for differences, if any, in the design standard or criterion for local transmission as compared to the design standard or criterion for backbone transmission

RESPONSE 4:

Please refer to Response 2 of this data request.

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QUESTION 5:

What factors constrain or effect SoCalGas/SDG&E's operation of local transmission (including, e.g., EG, MAOP, minimum flow requirements)?

RESPONSE 5:

There are many factors that affect the operation of the SoCalGas/SDG&E pipeline network, such as customer demand requirements, MAOP, system capacities, and minimum flow requirements. However, these factors are not unique to either backbone or local transmission designated pipelines.

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QUESTION 6:

What operating limits constrain or effect SoCalGas/SDG&E's operation of backbone transmission?

RESPONSE 6:

Please refer to Response 5 of this data request.

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QUESTION 7:

Please explain the reason for differences, if any, in the operating limits or constraints for local transmission as compared to those for backbone transmission

RESPONSE 7:

Please refer to Response 5 of this data request.

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QUESTION 8:

Are there specific minimum flow requirements that affect operation of local transmission?

RESPONSE 8:

Yes. The Southern System minimum flow requirement affects local transmission systems in the Southern System, as well as distribution systems and customers connected directly to the backbone transmission pipelines.

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QUESTION 9:

Are there specific minimum flow requirements that affect operation of backbone transmission?

RESPONSE 9:

Please refer to Response 8 of this data request.

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QUESTION 10:

Please explain the reason for differences, if any, in your flow requirements for local transmission as compared to your flow requirements for backbone.

RESPONSE 10:

SoCalGas/SDG&E do not issue minimum flow requirements for local transmission systems.

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QUESTION 11:

Your data response 5.4.3 to the 1st Data Request Set from Indicated Producers states: *“For those pipelines with both backbone and local transmission parts, costs were prorated between backbone and local transmission based on the percent of the total mileage for each part of the pipeline. For example, Line 324 was determined to change from a backbone to local transmission pipeline at a point three quarters of its entire length.”* As used in this data response,

- 11.1. Please explain what exactly is a backbone transmission part?
- 11.2. Please explain what exactly is a local transmission part?
- 11.3. In differentiating between backbone parts and local transmission parts, what factors distinguish a local transmission part from a backbone transmission part?
- 11.4. In differentiating between backbone parts and local transmission parts, does size matter?
- 11.5. In differentiating between backbone parts and local transmission parts, does pressure matter?
- 11.6. In differentiating between backbone parts and local transmission parts, do operating limits or constraints matter?
- 11.7. In differentiating between backbone parts and local transmission parts, what relevance does mileage have?
- 11.8. For Line 324, describe exactly how and why the line *“was determined to change from a backbone to a local transmission pipeline at a point three quarters of its entire length.”*
- 11.9. For every pipeline *“with both backbone and local transmission parts”*, were the factors affecting the distinction between parts exactly the same? If not, describe in detail the differences.
- 11.10. Did SoCalGas/SDG&E evaluate the nature of each pipeline under a variety of supply and demand conditions to determine which pipelines

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consistently provide backbone transmission service or local transmission service or which “parts” consistently provide backbone transmission service or local transmission service? If so, list the various supply and demand conditions and explain how those varied conditions differ from the conditions over the past 4 years.

RESPONSE 11:

- 11.1 For purposes of response 5.4.3 to Indicated Producers 1st Data Request in this proceeding, it is the segment of that pipeline performing that transmission function.
- 11.2 Please refer to Response 11.1 of this data request.
- 11.3 Please refer to page 7 and 8 of the Supplemental Direct Testimony of David Bisi in A.11-11-002.
- 11.4 Please refer to Response 11.3 of this data request.
- 11.5 Please refer to Response 11.3 of this data request.
- 11.6 Please refer to Response 5 and Response 11.3 of this data request.
- 11.7 Please refer to Response 11.3 of this data request.
- 11.8 Please refer to Response 11.3 of this data request.
- 11.9 Yes.
- 11.10. No. Please refer to Response 11.3 of this data request.

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QUESTION 12:

Before the establishment of the Otay Mesa receipt point, were any pipeline or portions of any pipelines in SDG&E's Rainbow Corridor classified as backbone transmission?

- 12.1. If so, identify the specific "parts" or segments, by location, of the backbone transmission.
- 12.2. If so, what were the factors that SoCalGas or SDG&E used to distinguish the pipelines or parts as local or backbone transmission?

RESPONSE 12:

12. No, the Rainbow Corridor is not part of the SDG&E system. The pipelines in SoCalGas' Rainbow Corridor were classified as local transmission pipelines prior to the establishment of the Otay Mesa receipt point.

12.1 N/A

12.2 N/A

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QUESTION 13:

With the exception of the addition of the Otay Mesa receipt point, have any other characteristics, uses, flows or functions of the pipelines in the Rainbow Corridor changed since September 2004? If so, please explain the changes in detail, including pipeline or pipeline “part”, location, date of change, and the specific nature of the change.

RESPONSE 13:

Pipeline flowrates on the SoCalGas/SDG&E system are a function of where supplies are delivered into the system and of customer demand, which are continuously in change as gas purchases vary, customers are added or removed, and distribution systems are changed. A temporary change in pipeline characteristics to Line 1027 in the Rainbow Corridor occurred in September 2012 when SoCalGas found anomalies in the pipeline, which required SoCalGas to reduce the operating pressure of the pipeline.

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QUESTION 14:

Does SoCalGas/SDG&E anticipate that deliveries through Otay Mesa will increase during the TCAP period? If so, provide all facts, documents or other information supporting this conclusion.

RESPONSE 14:

SoCalGas/SDG&E have made no forecast regarding the utilization of the Otay Mesa receipt point.