

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

**APPLICATION FOR AUTHORITY TO
REVISE THEIR CURTAILMENT PROCEDURES**

(A.15-06-020)

(8TH DATA REQUEST FROM THE INDICATED SHIPPERS)

QUESTION 08-01:

In response to Indicated Shippers Data Response 04-03, Sempra Utilities responded:

SoCalGas has informally been using zones for more than 15 years. The zones were originally informally developed to provide a quick common reference to general regions of the transmission system by several departments in operations and planning. Zones were generally defined based upon the design and operation of the SoCalGas and SDG&E transmission system, which limit where physical gas supplies can be transported. There was nothing inherently special about the zones, and the informal process did not require any management review or approval.

For the purpose of this application, the zones that originally referred to a general region of the transmission system needed to be clearly defined on a tariff-level map to limit each customer to only one zone that they are physically served from. The zones are still defined based upon the design and operation of the SoCalGas and SDG&E transmission system. The North Valley System and the Southern System – South of Moreno are both currently subject to the capacity open season process.

The local service zones themselves have not been used beyond a point of reference for planning and operations. Zones are subject to change over time as required, as stated in the Prepared Direct Testimony of David Bisi, page 6 lines 9-12, “Should operational considerations such as customer demand patterns or gas transmission system changes warrant either a modification to the zone boundaries, the combination of zones, or the creation of new zones, SoCalGas will submit the changes to the tariff map and zone descriptions by Tier 2 Advice Letter.”

Indicated Shippers 06-14 followed up on questions posed by Indicated Shippers in 04-03 that the Sempra response failed to respond to. Specifically, Indicated Shippers asked:

- a) What SoCalGas department originally developed the zones?
- b) Did Sempra management specifically review the local curtailment zones when reviewing this application?
- c) Have the local zones changed in size or physical attributes since first developed and used within the Sempra organization?
- d) Since the zones were first developed, have zones been created or eliminated?

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- e) Were any changes made to the size or physical attributes of the zones in the development of this proposal?
- f) If the answer to Question 06-14(e) is yes, what changes were made?

In its response to 06-14, Sempra utilities stated: "All of these questions are answered in Response 04-03."

Please provide the language in Response 04-03 that is directly responsive to each of the Indicated Shippers questions posed in a.-f. To the extent that the language of 04-03 is not responsive to the specific questions posed in 06-14 a.-f, please provide responsive answers.

RESPONSE 08-01:

- a. Per Response 04-03, "The zones were originally informally developed to provide a quick common reference to general regions of the transmission system by several departments in operations and planning."
- b. Per Response 04-03, "There was nothing inherently special about the zones, and the informal process did not require any management review or approval." Management is appraised before SoCalGas or SDG&E submit any application.
- c. Per Response 04-03, "SoCalGas has informally been using zones for more than 15 years," and "Zones are subject to change over time as required" The informal nature of the zones and any changes to the transmission system may have led to changes in the zones. It is quite likely that in the long history of SoCalGas that the informal references to general regions of the transmission system have been created, eliminated, or changed, but SoCalGas has no record of these changes.
- d. See Response 08-01(c).
- e. Per Response 04-03, "For the purpose of this application, the zones that originally referred to a general region of the transmission system needed to be clearly defined on a tariff-level map to limit each customer to only one zone that they are physically served from." Therefore, minor changes to the boundaries between zones may have been necessary for this application.
- f. See Response 08-01(e).