

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-68)**

**Date Requested: February 24, 2017
Date Responded: March 13, 2017**

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
7. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
 10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
 11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
 12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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Subject: Follow-ups to Discovery Responses in Cost Effectiveness Analysis in A.15-09-013

QUESTION 1:

In Response to ORA-43 Q. 6, Applicants state:

QUESTION 6:

Without Moreno compression station in service, if the Applicants' Proposal to build Line 3602 and derate Line 1600 were to be authorized:

- A. What would be the MOP, MinOP, expected OP, and the MAOP for Line 1600? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- B. What would be the MOP, MinOP, expected OP, and the MAOP for Line 3010? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- C. What would be the MOP, MinOP, expected OP, and the MAOP for Line 3602? What would the average annual and maximum seasonal mmcf/day flowing through the pipe?

RESPONSE 6:

As set forth in the Moreno Compressor Station-Operation Analysis, Attachment XII to the Prepared Direct Testimony of Neil Navin, SDG&E and SoCalGas expect that construction and operation of the proposed Line 3602 and the derating of Line 1600 will result in reduced operation of the Moreno Compressor Station. However, SDG&E and SoCalGas do not plan to operate without Moreno Compressor Station. Please refer to the response to Question 5 above for pressures and flows.

Further, the CEA dated March 2016, at page 31, Table 7 shows the amount of approximately \$5.86 million of estimated annual cost savings resulting from assuming reduced operations at Moreno Compressor Station (MCS) for the Proposed Project and certain Alternatives. Footnote 77 on the same page states the assumption that MCS "operations will be reduced by 95% to function minimally as a safeguard during extreme or unplanned capacity interruption scenarios for a 36" line."

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With the above response in ORA-43 Q.6 in mind, please confirm that the abovementioned assumption in the CEA Footnote 77 regarding MCS operations is still true and the estimated annual cost savings shown at page 31 Table 7 still remains accurate. If there are any changes to identify, please provide them, and explain the reasons for them.

RESPONSE 1:

The information and responses cited in this question remain valid at the present time based upon the existing equipment and assumptions set forth in SDGE-8-R: Updated Prepared Direct Testimony of Norm G. Kohls at Attachment XII – Moreno Compressor Station Operation Analysis. Moreno Compressor Station is a primary component of the SDG&E Gas Transmission System that must be maintained for system reliability. Any modifications to the station equipment in the future may result in changes or updates to the analysis. If changes or updates are necessary, SDG&E and SoCalGas (Applicants) will make them at the appropriate time.

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QUESTION 2:

In Response to ORA-57 Q. 1(b) & 1(c), which was a follow up on ORA-11 Q. 9, Applicants state:

QUESTION 1 (b):

Since the agreement between PG&E and SCG/SDG&E has been in place, has the agreement ever been used? If so, describe circumstances under which its use was triggered.

RESPONSE 1 (b):

PG&E was billed for inter-utility service related to the storage of gas under the terms of the Emergency Assistance Agreement. Per these terms, PG&E had transported a total of 1,021,496 MMBtu into SoCalGas' system for storage in anticipation of a potential core curtailment on PG&E's system. PG&E was billed at an agreed upon rate of \$0.155 per MMBtu for a total of \$158,331.88.

QUESTION 1 (c)

Have the terms of this agreement ever been revisited considering the Applicants' perceived need to address the probability of outages either on Line 3010 or the loss of all compression on Moreno, or both. Why or why not? If the agreement could not help SoCalGas/SDG&E receive gas in the Southern System, state why it cannot.

RESPONSE 1 (c):

No. An Emergency Assistance Agreement with PG&E would not be of assistance because PG&E has no interconnection with the SoCalGas and SDG&E system that could deliver gas in lieu of a capacity loss due to a Moreno Compressor outage or a Line 3010 outage.

Note that previously in ORA-11 Q. 9 asked:

Does SoCalGas/SDG&E have any agreements or contracts in place that provide for making additional gas supplies available via other systems in the advent of an emergency or force majeure? If so, please identify and provide all such agreements, and explain.

In Response to ORA-11 Q. 9, SCG/SDG&E stated:

"SDG&E and SoCalGas do have one agreement that could possibly provide for additional gas supplies via another system in the case of an emergency or force majeure. SoCalGas and Pacific Gas and Electric Company entered into an

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agreement dated 1988 which provided that either utility could request of the other gas volumes in any amount sufficient to make up the deficiency in its own gas supplies for its P-1/P-2A customers' requirements.

With all the above responses in mind, please clarify the following below:

- (a) Would it be accurate to say that PG&E had transported a total of 1,021,496 MMBtu into SoCalGas' system for storage in anticipation of a potential core curtailment on PG&E's system because PG&E has an interconnection with the SoCalGas and SDG&E system that could deliver gas supplies and have them parked into the SoCalGas gas storage? If this statement is not accurate, please explain which part is inaccurate. If the statement is accurate, then please identify the point of interconnection between PG&E's system with the SoCalGas and SDG&E system which makes the transportation of gas supplies between them possible and describe the maximum capacity of gas flow that could be handled.
- (b) If the situation were the other way around, that is, if SoCalGas/SDG&E have an anticipated potential curtailment event, is it possible for SoCalGas and SDG&E to request PG&E to purchase gas supplies and park them in PG&E's gas storage as SoCalGas/SDG&E peak gas supply held in reserve for a certain time period under the Emergency Assistance Agreement? Please respond first with a yes or no answer, and then explain your response.
- (c) Would it be accurate to say that an Emergency Assistance Agreement with PG&E involves only the request for gas supplies, and not transportation capacity, and would not be of assistance because PG&E has no interconnection with the SoCalGas and SDG&E system that could replace a capacity loss due to a Moreno Compressor outage or a Line 3010 outage? If the statement is not accurate, please explain the reason for the inaccuracy and provide an accurate restatement that explains why an Emergency Assistance Agreement could not replace a capacity loss due to a Moreno Compressor outage or a Line 3010 outage.

RESPONSE 2:

- (a) Yes. For this specific transaction, PG&E scheduled gas into the SoCalGas system from the El Paso, Transwestern, Kern/Mojave and PG&E (at Kern River Station) systems. The points of interconnection used to deliver the stored gas for this transaction into the PG&E system are unknown. The agreement lists existing points of interconnection at Buttonwillow, Kern River (Station), Kettleman, Topock, and Pisgah.

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- (b) Yes. It is possible to do so under the agreement. Gas stored on PG&E's system would be delivered to the SoCalGas system at one of the specified Points of Interconnection. However, none of this gas could be physically delivered to the SDG&E system from these points.
- (c) Yes.

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QUESTION 3:

In various responses to ORA-59 in Q. 1, 3, and 4, and to ORA-33 Q. 4, Applicants state:

QUESTION 1:

SoCalGas/SDG&E have energy efficiency and demand response programs which are demand side variables that affect load. Please describe the role of energy efficiency and demand response programs in the scenario analysis, if any. If these demand-side resources have no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding these programs in the scenario analysis.

RESPONSE 1:

The electric demand values used in the CEA scenario analysis (see CEA page 68, table 35) are considered to be net of effects of energy efficiency and demand response programs. For additional insight, please see page 17 of the Prepared Direct Testimony of Ali Yari for a discussion on demand response programs and impacts on potential outages.

Further, in Response to ORA-59 Question 3, Applicants state:

QUESTION 3:

Please describe the role of renewable energy generation in the scenario analysis, if any. If the renewable energy generation has no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 3:

In the CEA, renewable energy is a component of the overall electric supply as outlined in the CEA in Table 35 at page 68. In addition to the renewable electric quantities shown in the subject table, it should be noted that electric imports also include electricity that is generated from renewable resources. In addition, behind-the-meter solar generation such as residential rooftop solar reduces the electric demand which the utility must supply. The electric demand values utilized in the scenario analysis account for this and are considered net of any behind-the-meter solar generation. For additional insight, see the Prepared Direct Testimony of Ali Yari, page 16, for the discussion of renewable energy in San Diego and the impacts during a gas curtailment or interruption.

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In Response to ORA-59 Question 4, Applicants state:

QUESTION 4:

Please describe the role of renewable energy generation in the scenario analysis, if any. If the renewable energy generation has no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 4:

In the CEA, renewable energy is a component of the overall electric supply as outlined in the CEA in Table 35 at page 68. In addition to the renewable electric quantities shown in the subject table, it should be noted that electric imports also include electricity that is generated from renewable resources. In addition, behind-the-meter solar generation such as residential rooftop solar reduces the electric demand which the utility must supply. The electric demand values utilized in the scenario analysis account for this and are considered net of any behind-the-meter solar generation. For additional insight, see the Prepared Direct Testimony of Ali Yari, page 16, for the discussion of renewable energy in San Diego and the impacts during a gas curtailment or interruption.

In Response to ORA-33 Question 4, Applicants state:

QUESTION 4:

Please confirm that SDG&E's electric generation forecast numbers do "not include the doubling of energy efficiency programs, as mandated in SB 350, due to timing constraints" as described on page 72 under SoCalGas' natural gas forecast.

RESPONSE 4:

Yes.

In, addition, to the above responses, Mr. Yari's Testimony states on page 14:

The peak electrical demand is projected to reach up to 5,372 MW in 2016 climbing at an annual growth rate that varies, but typically is around 1 percent per year through 2025.

And Mr.Yari also states on page 17 of his testimony:

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Although SDG&E does have Demand Response (DR) programs, the amount of DR is very limited and would not have any significant impact in resolving the problems of potential blackouts. The number of DR programs available depends upon the season.

With all of the above responses and the statements from Mr. Yari's testimony in mind, please clarify as follows:

- (a) Would it be accurate to say the projected peak electrical demand of 5,372 MW in 2016 growing through 2025 at 1 percent per year is "net of the effects" because the energy efficiency/demand response programs that are currently committed in SDG&E's area to date are already included, which means the peak demand forecast includes only currently committed programs and does not include any future energy efficiency/demand response targets that are still uncommitted? Please first respond with a yes or no, and then explain your response.
- (b) Would it be accurate to say the projected peak electrical demand of 5,372 MW does not include the doubling of energy efficiency programs mandated in SB 350? If not, please explain the reason for the inaccuracy of the statement and provide an accurate restatement that describes the peak demand of 5,372 MW in relation to the doubling of energy efficiency programs mandated in SB 350.
- (c) Would it be accurate to refer to the projected peak electrical demand of 5,372 MW growing at around 1 percent per year through 2025 as one based on a 1-in10- year demand forecast with no Additional Achievable Energy Efficiency (AAEE)? Please first respond with a yes or no, and then explain your response.

Unless CEC has a more recent definition, the term AAEE is used here as described in the Supplement to California Energy Demand 2014-2024 Revised Forecast, p.2 which states : "Committed efficiency savings reflect savings from initiatives that have been approved, finalized, and funded, whether already implemented or not. There are also likely additional savings from initiatives that are neither finalized nor funded but are reasonably expected to occur, 10

- (d) The updated demand forecast from the CEC for 2016-2027 is available at http://www.energy.ca.gov/2016_energypolicy/documents/2016-12-08_workshop/mid_demand_case.php. If the forecast of peak electrical demand for SDG&E were to be based on the CEC demand update forecast 2016-2027 which starts from year 2016 with 4,697 MW which grows to 4,769 MW in year 2025 at an average of 0.15% per year, would it then be accurate to refer to the projected peak electrical demand as one

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based on a 1-in-10 year demand forecast with no AAEE? Please first respond with a yes or no, and then explain your response.

- (e) Please confirm whether SoCalGas/SDG&E expects to update the forecast of peak electrical demand based on the CEC demand update forecast 2016-2027 as described in item (d) above or to the latest one adopted in Docket No. 16-IEPR-05 by the CEC Resolution adopting the California Energy Demand Updated Forecast 2017-2027 that incorporate AAEE with docketed date of January 30, 2017. If SoCalGas/SDG&E does expect to update this forecast, please identify the date of such an update.
- (f) On October 31, 2016, SDG&E submitted its semi-annual report on its gas system capacity planning and demand forecasts pursuant to D.02-11-073 in the Gas Transmission OII (I.00-11-002). Compared to the previous report submission, SDG&E's Long Term Demand Forecast, shows lower total forecast demand under the 1-in-10 year cold day forecast from 2021/2022 onwards through 2035/2036. Total demand in the most recent submission is forecast to decrease from 581 MMcfd in 2021/2022 to 546 MMcfd in 2035/36. This is lower than the previous forecast submitted earlier in 2016 which showed total demand growing from 590 MMcfd to 617 MMcfd in the same period. Does SoCalGas/SDG&E expect to update the forecast of peak demand in this proceeding based on this recent submission described? If not, why not?
- (g) Continuing with the long term demand forecast described in item (f) above under the 1-in-10 year cold day forecast, ORA notes the that the demand forecast for the core and the EG class in the October 2016 submission decreased compared to the prior submission. For the core class, demand is forecast to rise from 366 MMcfd in 2016/2017 to 381 MMcfd in 2035/2036 while for the EG class, demand is forecast to decline from 152 MMcfd to 103 MMcfd during the same period. The previous forecast showed the core class demand growing from 350 MMcfd in 2016/2017 to 382 MMcfd in 2035/2036 while the EG class had demand growing from 165 MMcfd to 174 MMcfd during the same period. Please explain the reasons which account for the rise in the core class demand forecast and the decline in the EG class forecast as noted.

RESPONSE 3:

- (a) Yes, this is a correct statement. The forecast containing 5,372 MW as the peak demand for 2016 is the CEC's 2014 IEPR Mid Demand forecast, assuming 1-in-10 high temperature weather conditions. Please note that SDGE-4-R: Updated Prepared Direct Testimony of S. Ali Yari, was based on the CEC California Energy Demand Updated Forecast 2017-2027, and states:

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“The peak electrical demand is projected to reach up to 4,693 MW in 2017 climbing at an annual growth rate that varies, and averages about 0.2 percent per year through 2027.” See SDGE-4-R at page 14.

The cited source is California Energy Commission, 2016 California Energy Demand Electricity Forecast Update – *Final CEDU2016 SDGE Mid Demand Case*, January 23, 2017:

http://www.energy.ca.gov/2016_energy_policy/documents/2016-12-08_workshop/mid_demand_case.php

Please note that following the Applicants’ service of Updated Prepared Direct Testimony on February 21, 2017, the CEC corrected its forecast for SDG&E’s service territory to 4,860 MW in 2017 with no AAEE:

http://www.energy.ca.gov/2016_energy_policy/documents/2016-12-08_workshop/mid_demand_case.php

Specifically, see tab “SDGE Form 1.5-Mid” at:

http://docketpublic.energy.ca.gov/PublicDocuments/16-IEPR-05/TN216257_20170227T142915_Corrected_CEDU_2016_SDGE_Mid_Demand_Case.xlsx.

The CEC corrected its forecast for SDG&E’s service territory to 4,811 MW in 2017 with the incorporated Mid Case AAEE.

http://www.energy.ca.gov/2016_energy_policy/documents/2016-12-08_workshop/LSE-BA_Forecasts.php

Specifically, see tab “SDGE Form 1.5-d” at:

http://docketpublic.energy.ca.gov/PublicDocuments/16-IEPR-05/TN216264_20170227T144018_Corrected_LSE_and_BA_Tables_Mid_Baseline_Mid_AAEE.xlsx.

- (b) Yes, it is correct to say that the forecast mentioned above does not include AAEE that may result from SB 350’s mandate that the Commission identify “all potentially achievable cost-effective electricity efficiency savings and establish efficiency targets for an electrical corporation to achieve.” See Public Utilities Code § 454.55(a).
- (c) Yes, the forecast mentioned above is a 1-in-10 forecast that does not incorporate AAEE. The 1-in-10 forecast with incorporated AAEE was published on 2/27/2017 with a 2017 forecast of 4,811 MW.

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- (d) Please visit the CEC's website to find the correct peak forecast information, corrected on 2/27/2017.

http://www.energy.ca.gov/2016_energypolicy/documents/2016-12-08_workshop/mid_demand_case.php (with no AAEE)

http://www.energy.ca.gov/2016_energypolicy/documents/2016-12-08_workshop/LSE-BA_Forecasts.php (with Mid Case AAEE)

- (e) The most recent CEC demand forecast was not adopted early enough for inclusion in Applicants' most recent forecast of the 1-in-10 cold day gas demand due to electric generation (Cold Day EG Forecast), which is presented in SDGE-12: Supplemental Testimony of SDG&E and SoCalGas at 84, Table 5. Applicants do not expect to update the Cold Day EG Forecast in this application based on the most recent CEC forecast. As explained in SDGE-12: Supplemental Testimony of SDG&E and SoCalGas at 88-89, the most recent CEC forecast is not materially different from the earlier CEC forecast and its incorporation into the Cold Day EG Forecast would likely only result in immaterial reductions to the forecast. Furthermore, it is important to note that the Proposed Project is not driven by a need for more capacity to serve peak daily demand with all system facilities in service.
- (f) Yes. Applicants have updated the peak demand forecasts in this proceeding based on the October 31, 2016 Gas Capacity Planning and Demand Forecast Semi-Annual Report (October Report). Please see SDGE-12: Supplemental Testimony of SDG&E and SoCalGas at 84, Table 5 for the updated forecasts of peak demand.
- (g) The October Report contains updated core peak demand forecasts as compared to the core peak demand forecasts in the April 29, 2016 Gas Capacity Planning and Demand Forecast Semi-Annual Report (April Report). The updated core peak demand forecasts were based on higher employment forecasts and lower natural gas price forecasts which increased the core commercial and industrial components of the core peak demand forecasts. Also, the October Report core peak demand forecasts incorporated historical 2015 consumption data while the earlier April report core peak demand forecasts incorporated forecasted 2015 consumptions. The 2015 historical core commercial and industrial consumptions were higher than forecasted which contributed to the increase in the October Report core peak demand forecasts.

For the EG market, the lower October Report forecast was caused by the incorporation of the update to the CEC's California Energy Demand (CED) forecast as well as changes to Renewables Portfolio Standards (RPS) assumptions. The EG forecast in the April Report

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was created using the December 2014 CED forecast under an assumed RPS level of 33% achieved by year 2020 and maintained in subsequent years. The EG forecast in the October Report was created using the December 2015 CED forecast, which was lower than its predecessor, under a higher assumed RPS level of 50% achieved by year 2030 and maintained in subsequent years.

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QUESTION 4:

In the previous proceeding, A.13-12-013, ORA received a discovery response to ORA-02 Q.2b where SoCalGas/SDG&E showed the Otay Mesa total gas deliveries in Dths (10,043,000 Dths) from 6/1/2008 through 9/17/2014 that was available as of the date of the response. The data in the response also shows the average daily deliveries for the period in question (4,368 Dths/day) and the number of days deliveries were made at the receipt point (154) as well as the percentage of those delivery days (7%) in relation to the total number of days in the period (2,299 days). Please provide ORA with an update to the response to ORA-02 Q.2b up to the latest available date in 2017. If 2017 data is not available, please explain when it becomes available.

RESPONSE 4:

The attachment to this response provides the volume of supplies received into the Southern System at Otay Mesa from 06/01/2008 to 02/28/2017 and provides the total deliveries in Dth (10,352,000 Dth). It also shows the average daily deliveries for the period in question (3,240 Dth/day) and the number of days deliveries were made at the receipt point (168) as well as the percentage of those delivery days (5%) in relation to the total number of days in the period (3,195 days). These statistics demonstrate that deliveries to Otay Mesa were not significant. Otay Mesa receipts as a percentage of total SDG&E throughput during the indicated period is approximately 1%.

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QUESTION 5:

In Ordering Paragraph #3 of D.07-05-022, the Commission approved the SoCalGas/SDG&E Application in A.06-10-034 for authority to support reliable deliveries at Otay Mesa. Please confirm whether SoCalGas/SDG&E actually made use of this authority to solicit bids for additional system capacity as approved in D.07-05-022. If SoCalGas/SDG&E did not make use of the authority in D.07-05-022 as described, please explain the reason for this.

RESPONSE 5:

No. Service was no longer timely due to the pending implementation of the Firm Access Rights (FAR) proceeding, A.04-12-004, as approved by D.06-12-031.