

**TRIENNIAL COST ALLOCATION PROCEEDING PHASE 1 APPLICATION
OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES EFFECTIVE JANUARY 1, 2016**

(A.14-12-017)

(DATA REQUEST ORA-TCAP-SCG-07)

QUESTION 1:

The following questions reference Sempra's proposal to allocate injection/withdrawal rights on a seasonal basis (vs. an annual basis, as has been done until now¹):

- a. Please provide the start and end dates of the "winter" and "summer" seasons, as defined in Table 3 of Mr. Watson's testimony.²
- b. Would injection and withdrawal allocations both use the same definitions of "winter" and "summer"? If not, please answer part (a) for each separately.
- c. Could the definitions of "winter" and "summer" change at any point over the next TCAP period? If so, under what conditions?
- d. If the answer to part (c) is yes, what would the new definitions be?

RESPONSE 1:

- a. Winter = November 1 through March 31st. Summer = April 1 through October 31st.
- b. Yes.
- c. No.
- d. See Response 1.c.

¹ Sempra Response to ORA-DR-05, Q2.

² Sempra Application (Watson) page 10, line 14.

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QUESTION 2:

Please provide monthly nominations of storage withdrawal and injection rights by the core for the past six years.

RESPONSE 2:

CONFIDENTIAL
Submitted under the provisions of
General Order 66-C and Section 583 of the Public Utilities
Code



TCAP ORA DR 7 R2
Nominations.xlsx

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QUESTION 3:

Please describe any changes to physical or technological systems that would need to occur in order to allocate injection/withdrawal rights on a seasonal basis (as proposed in Sempra's application).

RESPONSE 3:

None that SoCalGas and SDG&E are aware of. The proposal is consistent with current realities.

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QUESTION 4:

If injection/withdrawal capacity allocation were to be moved to a seasonal basis as proposed in Sempra's application (vs. an annual basis as currently allocated):

- a. Would all customer groups necessarily need to be allocated on a seasonal basis? If yes, please explain why.
- b. If the answer to part (a) is no, please explain any limitations to allocating some customers on a seasonal basis and some on an annual basis. If no limitations exist, please state as such.
- c. If the answer to part (a) is no, please explain any reasons why Sempra might allocate rights to some customers on a seasonal basis and others on an annual basis.
- d. If the answer to part (a) is no, please identify which category (Balancing, Core, or Unbundled) of customers Sempra might not switch to a seasonal basis and why.
- e. In the event of a switch from annual allocation to seasonal allocation (or vice versa), would there be any phasing of the switching? If so, please explain the phasing.
- f. Are there any other reasons why some customers would not be allocated on a seasonal basis? If so, please explain.

RESPONSE 4:

- a. Balancing rights would be year-round. Core rights would be seasonal per Table 3 in the prepared direct testimony of Steve Watson. Unbundled storage rights would be negotiated on a contract-specific basis, subject to the seasonal totals shown in Mr. Watson's testimony. SoCalGas would not be selling firm injection rights to unbundled storage customers for the winter period. SoCalGas could only sell up to 206 MMcfd of firm withdrawal rights to unbundled storage customers for the summer period.
- b. See a.
- c. Set balancing rights are allocated on a year-round basis because low or high OFOs might be triggered at any time of the year using the same rules and storage allocations.
- d. See b.
- e. Assuming implementation in Q1 2016, no.
- f. None that SoCalGas and SDG&E anticipate.

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QUESTION 5:

Is Sempra aware of any data (internal or external) that predict changes to:

- a. Total injection or withdrawal nominations as a result of long-term weather/climate changes or market forces?
- b. Injection or withdrawal nominations from any single category (Balancing, Core, or Unbundled) as a result of long-term weather/climate changes or market forces?

RESPONSE 5:

- a. No.
- b. No.