

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-33)**

Date Requested: August 16, 2016

Date Responded: August 30, 2016

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: 2016 California Gas Report

QUESTION 1:

Please confirm that the 2016 California Gas Report (CGR) SDG&E component is prepared by SoCalGas and/or SDG&E staff as shown on page 140 of the CGR.

RESPONSE 1:

The 2016 California Gas Report (CGR) SDG&E component is prepared by SoCalGas and SDG&E staff.

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QUESTION 2:

Please confirm that total gas consumption for all electric generation is forecast to decrease 14 Bcf between 2015 and 2035, from 72 Bcf in 2015 to 58 Bcf in 2035, as indicated on page 115 of the 2016 California Gas Report.

RESPONSE 2:

Yes, the above information in the 2016 CGR refers to the dry hydro forecast for electric generation (EG) in SDG&E's service territory. Applicants note that while total gas quantities for electric generation are forecast to decrease on an annualized basis, conclusions cannot be drawn that this forecast also applies to the peak daily and peak hourly gas demands for which the gas system must be able to supply in the future. The gas system must retain the capacity and operational flexibility to quickly respond and serve local gas fired electric generation when called upon to make up for rapid changes in the growing portfolio of intermittent renewable electric generation. Please reference the direct testimony of Dave Bisi at pages 11 through 16 for further explanation.

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QUESTION 3:

Please confirm that total gas consumption for all electric generation is forecast to decrease between 2015 and 2035, including for a normal hydro year and under a 1-in-10 dry hydro year conditions.

RESPONSE 3:

Yes, this is true for electric generation in SDG&E's service territory. Applicants note that while total gas quantities for electric generation are forecast to decrease on an annualized basis, conclusions cannot be drawn that this forecast also applies to the peak daily and peak hourly gas demands for which the gas system must be able to supply in the future. The gas system must retain the capacity and operational flexibility to quickly respond and serve local gas fired electric generation when called upon to make up for rapid changes in the growing portfolio of intermittent renewable electric generation. Please reference the direct testimony of Dave Bisi at pages 11 through 16 for further explanation.

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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.

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QUESTION 5:

Has SoCalGas and/or SDG&E conducted any studies for natural gas requirements and supplies to SoCalGas and SDG&E that examine short-term (rather than the average) natural gas demand under the assumptions used in the 2016 California Gas Report? If so, please provide them.

RESPONSE 5:

SDG&E and SoCalGas have not conducted any short-term (*i.e.*, monthly, daily, hourly) studies for natural gas requirements and supplies under the assumptions used in the 2016 CGR. The forecasting models used for the non-EG markets produce annual forecasts only. Any shorter-term forecasts were extrapolated from these annual forecasts. For the EG market, the Market Analytics model can simulate and dispatch power plants hourly. However, the assumptions and input data used for the 2016 CGR were based on long term averages which, for short-term forecasting purposes, possess unrealistically dampened volatility. As a consequence, no short-term studies were performed under 2016 CGR assumptions.