

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

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

(A.15-06-020)

(Data Request SCE-SEMPRA-DR-01)

QUESTION:

According to the October 27, 2016 Operational Hub Positions report, a Net HUB position of 4,092,421 Dth of Parks is scheduled for withdrawal January through March of 2017. SCE understood that with Aliso Canyon unavailable, SoCalGas was using all available gas storage for existing unbundled contracts that are active, core, and load balancing. The TCAP Phase 1 core storage allocation of 83 Bcf and the balancing storage allocation of 5.1 Bcf exceeds the current gas storage available to SoCalGas.

1. Please describe how the HUB was able to provide 4 BCF for parking service.
2. Please provide dates with corresponding volumes when gas was parked on SoCalGas' system.
3. What is the allocation of gas storage between all core (including SoCalGas/SDG&E, Long Beach, Southwest Gas, etc.), system balancing, HUB service, and other unbundled storage that is currently physically available to SoCalGas/SDG&E as of November 1, 2016?
4. How much gas storage must be available to SoCalGas/SDG&E before the remaining unbundled gas storage is available to customers?
5. Does HUB have preferential access to unbundled gas storage ahead of other unbundled gas storage customers?

RESPONSE:

Pursuant to Rule 10.1, Southern California Gas Company (SoCalGas) objects to these Data Requests (DRs) based on the following grounds:

1. Irrelevant. The information sought by SCE is not relevant to the subject matter of this proceeding as it will not be admissible as evidence as this proceeding is effectively closed;
2. Untimely. The information sought by SCE is untimely as SCE had well over one-year to make this request and only now makes the request when the proceeding is effectively closed.
3. Vague and ambiguous as to timeframe.

SoCalGas reserves all rights including, without limitation, the right to oppose the use of this information in this proceeding. This response is not intended to be and does not constitute a waiver of any kind. Subject to and without waiving these objections, SoCalGas responds as follows:

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1. The approximately 4 Bcf of gas was already parked in the unbundled storage program prior to the Aliso Canyon incident.
2. The attached table shows net Hub positions at the end of the months November 2015 through October 2016.

Month	Ending HUB Position
Nov-15	14,976,509
Dec-15	12,921,509
Jan-16	12,530,299
Feb-16	12,310,798
Mar-16	11,908,777
Apr-16	10,460,947
May-16	9,024,748
Jun-16	7,635,020
Jul-16	5,310,981
Aug-16	4,092,421
Sep-16	4,092,421
Oct-16	4,092,263

3. As of November 1, 2016, the inventories allocated to storage as required by the Phase 1 TCAP decision are: 83 Bcf core; 8 Bcf balancing; and 47 Bcf unbundled storage, which includes the park program. Long Beach and Southwest hold just over 2 Bcf of unbundled storage rights.
4. SoCalGas will re-evaluate whether new, additional gas storage can be provided to unbundled storage customers when injection at Aliso Canyon resumes.
5. No. SoCalGas, however, has the discretion to sell unbundled storage inventory in the GTBS program or in the park program.