**QUESTION 2.1:**

2.1. With respect to Tuan Nguyen’s direct testimony at page 2, Table 1, please provide the following information for each local service zone listed in the table:

2.1.1. Peak core daily loads for summer season

2.1.2. Peak core daily loads for winter season

2.1.3. Average core daily loads for summer season

2.1.4. Average core daily loads for winter season

2.1.5. Standard deviation of core daily loads during summer season

2.1.6. Standard deviation of core daily loads during winter season

2.1.7. Number of core customers

2.1.8. Peak noncore commercial/industrial daily loads for summer season

2.1.9. Peak noncore commercial/industrial daily loads for winter season

2.1.10. Average noncore commercial/industrial daily loads for summer season

2.1.11. Average noncore commercial/industrial daily loads for winter season

2.1.12. Standard deviation of noncore commercial/industrial daily loads during summer season

2.1.13. Standard deviation of noncore commercial/industrial daily loads during winter season

2.1.14. Number of noncore commercial/industrial customers

2.1.15. Peak noncore electric generation daily loads for summer season

2.1.16. Peak noncore electric generation daily loads for winter season

2.1.17. Average noncore electric generation daily loads for summer season

2.1.18. Average noncore electric generation daily loads for winter season

2.1.19. Standard deviation of noncore electric generation daily loads during summer season

2.1.20. Standard deviation of core daily loads noncore electric generation winter season

2.1.21. Number of noncore electric generation customers

2.1.22. Peak noncore cogeneration daily loads for summer season

2.1.23. Peak noncore cogeneration daily loads for winter season

2.1.24. Average noncore cogeneration daily loads for summer season

2.1.25. Average noncore cogeneration daily loads for winter season

2.1.26. Standard deviation of noncore cogeneration daily loads during summer season

2.1.27. Standard deviation of noncore cogeneration daily loads during winter season

2.1.28. Number of noncore cogeneration customers

**RESPONSE 2.1:**

SoCalGas and SDG&E object to this request on the grounds that it seeks confidential customer data. Information by zones is not sufficiently aggregated for the EG market segment and some of the noncore cogeneration segment. Without waiving this objection, and subject thereto, SoCalGas and SDG&E respond as follows:

Please refer to the attached spreadsheet ‘SCGC DR2.1’ for Responses 2.1.1 through 2.1.28, excluding the average daily load data. Responses to this data request are based on daily operational (i.e. not billing) data for the entire SoCalGas and SDG&E gas transmission system, and should be considered as estimates for the noted time periods. Those responses which would divulge customer confidential data have been indicated with “CONFD”.

For the purposes of this response, SoCalGas and SDG&E utilized the most recent full operating year. “Summer” was defined as April through October, 2014, and “winter” as November 2014 through March 2015. Customer counts were taken at 2014 year-end.

Peak demand is the non-coincidental daily peak for each customer class across the entire system. Average demand is the average of all days in the respective summer and winter months. Standard deviation is taken from the daily demand in the respective summer and winter months. These values were then allocated to the zones based on the methodology described below.

Core load was allocated to each zone by the number of customers in each zone. Noncore commercial/industrial load was allocated using 2014 yearly aggregate demand. Noncore cogeneration load was allocated to each zone by the number of customers in each zone.

At a December 10, 2015, meet-and-confer, after discussing SoCalGas and SDG&E’s inability to provide average daily load for the EG market due to customer confidentially requirements, SCGC modified its request related to the average daily load data. The modified request is to provide each customer group’s (core, noncore commercial/industrial, noncore electric generation, and noncore cogeneration) relative contribution to the total average daily load in each zone by season, while not providing the absolute level of average daily load in each zone. This data is provided in the attached spreadsheet ‘SCGC DR2.1 – AVG.’



