

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

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

(A.15-06-020)

(2ND DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

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

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- 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:

Response 2.1 is still being developed and will be provided by November 20, 2015.

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QUESTION 2.2:

2.2. With respect to Mr. Nguyen’s testimony at page 3, which states: “If it is necessary to extend a curtailment to include firm service, customers in the second and third curtailment queues are curtailed. Unlike interruptible service customers, firm service customers are not curtailed pro rata. Rather, they are curtailed 100% in blocks. Each customer has a randomly assigned queue position within a curtailment block.”

2.2.1. How many curtailment blocks are established by this system for each queue?

2.2.2. How much total load is represented by each of the curtailment blocks?

2.2.3. Is each curtailment block made up of customers located throughout the SoCalGas system?

2.2.4. If the answer to the previous question is “no,” please explain the geographic breakdown of customers in the curtailment blocks

RESPONSE 2.2:

2.2.1: There are two firm queues in this system, one for Utility Electric Cogeneration and Cogeneration (#1) and the second for all other noncore firm customers (#2). Firm queue #1 has 28 blocks. Firm queue #2 has 51 blocks.

2.2.2: Each curtailment block represents an aggregated customer load based on peak day usage of 20 MMCF per day. If a customer has a load greater than 20 MMCF per day, they would be listed separately as one whole block.

2.2.3: The blocks are developed randomly from customers throughout the system. For blocks that consist of a single customer or small number of customers, the block itself would not be made up of customers throughout the system.

2.2.4: See Response 2.2.3.

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QUESTION 2.3:

With respect to Mr. Nguyen's discussion of administrative burden on page 3, how many customers are assigned to each of the curtailment blocks identified in response to Q.2.2.1?

RESPONSE 2.3:

There are two firm queues in this system, one for Utility Electric Cogeneration and Cogeneration (#1) and the second for all other firm noncore meters (#2).

Firm queue #1(UEG and Cogen) has 28 blocks. There are between 1 - 23 meters for each block in this queue.

Firm queue #2 (Other firm noncore) has 51 blocks. There are between 1 - 48 meters for each block in this queue.

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QUESTION 2.4:

With respect to Mr. Nguyen's testimony at page 4 that states: "If firm service has to be curtailed, EG customers are curtailed first on a pro rata basis based on allocations made by SDG&E." Please explain the "allocations made by SDG&E."

RESPONSE 2.4:

See SDG&E Rule 14 Section M.1.b(3). The maximum authorized hourly contract quantity a customer is entitled to use during a noncore gas transportation service curtailment is set forth in the customer's Request for Retail Noncore Gas Services Agreement (Agreement).

In order to determine the pro-rata share that each EG customer with firm contract quantities is allowed to operate at, SDG&E determines the percentage of the firm contract quantities that need to be curtailed in order to achieve the volume of gas required for the curtailment.

SDG&E calculates the percentage by dividing the volume of gas required to be curtailed by the total firm hourly contract quantities of the EG customers for the curtailment day.

SDG&E applies the percentage against each customer's contract quantities and advises the customer of their maximum authorized contract quantity during the curtailment.

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QUESTION 2.5:

2.5. With respect to Mr. Nguyen’s testimony at page 4 that states: “If further curtailment is necessary, then other firm service noncore customers are curtailed by rotating blocks. The blocks are contained in two ordered customer lists. One list contains noncore firm cogeneration customers, and the second list contains the remaining noncore firm, non-EG customers. A customer’s order position on the lists is determined by lottery or by other non-discriminatory means. Each list is maintained to accommodate new customers as well as customers departing the list. Blocks are groups of customers aggregated in an operationally feasible way.”

2.5.1. How many curtailment blocks are established for each of the lists?

2.5.2. Are the “groups of customers aggregated in an operationally feasible way” located in adjacently in a geographical manner?

2.5.3. If the answer to the previous question is “no,” please explain in detail what constitutes aggregating customers in an operationally feasible way.

RESPONSE 2.5:

2.5.1: There are 2 blocks of Cogen and 2 blocks of non-EG.

2.5.2: Yes, customers are aggregated into operationally feasible blocks all within the County of San Diego.

2.5.3: N/A

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QUESTION 2.6:

With respect to Mr. Nguyen's testimony regarding curtailment baseline quantities on page 5, would curtailment baseline quantities be established for electric generation customers as well as cogeneration and non-EG noncore load?

RESPONSE 2.6:

Yes.

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QUESTION 2.7:

If the answer to the previous questions is “no,” please explain why not.

RESPONSE 2.7:

N/A

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QUESTION 2.8:

Would the System Operator depend entirely upon the Grid Operators to determine the then current operating characteristics of each of the electric generation customers in the affect local service zone during a curtailment?

RESPONSE 2.8:

No.

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QUESTION 2.9:

If the answer to the previous question is “no,” please explain in detail how the System Operator would determine the then current operating characteristics for each of the electric generation customers in the affect local service zone during a curtailment?

RESPONSE 2.9:

SoCalGas monitors the flow rates of all large electric generation customers in real time 24 hours a day. During a curtailment event, this information, along with input from the Grid Operators, will establish the operating parameters for EG plants in the affected zone to support both electric grid and gas system reliability.

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QUESTION 2.10:

- 2.10. Per Mr. Nguyen's testimony on page 6, regarding the proposed contracting process:
- 2.10.1. How much notice to end its contract would SoCalGas require for a customer under a month-to-month contract?
- 2.10.2. How frequently does SoCalGas expect to update the curtailment baseline quantities for each customer?

RESPONSE 2.10:

- 2.10.1: SoCalGas requires a 20 day notice to end contracts.
- 2.10.2: SoCalGas expects to update the curtailment baseline quantities once per year for each customer.