

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.1:**

4.1. With respect to the testimony on page 4, lines 3-8:

- 4.1.1. What portion of 2011 southern system minimum flows was represented by the core's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.2. What portion of 2011 southern system minimum flows was represented by the noncore's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.3. What portion of 2011 southern system minimum flows was represented by the electric generation requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.4. What portion of 2012 southern system minimum flows was represented by the core's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.5. What portion of 2012 southern system minimum flows was represented by the noncore's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.6. What portion of 2012 southern system minimum flows was represented by the electric generation requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.7. What portion of 2013 southern system minimum flows was represented by the core's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.8. What portion of 2013 southern system minimum flows was represented by the noncore's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?

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SOUTHERN CALIFORNIA GAS COMPANY  
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(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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- 4.1.9. What portion of 2013 southern system minimum flows was represented by the electric generation requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.1.10. What was the term of the capacity rights on the El Paso Southern Mainline to Ehrenberg that Gas Acquisition purchased?
- 4.1.11. When were the capacity rights for Ehrenberg purchased by Gas Acquisition?
- 4.1.12. Were those capacity rights purchased directly from El Paso or were they brokered capacity?
- 4.1.13. Which other pipelines did Gas Acquisition compare the price of Ehrenberg capacity to?
- 4.1.14. Were those comparison capacity rights to be purchased directly from the corresponding pipeline or were they to be brokered capacity?

**RESPONSE 4.1:**

- 4.1.1 – 4.1.9 SoCalGas and SDG&E object to these questions on the grounds that they requests confidential customer-specific information.
- 4.1.10 November 1, 2013 through October 31, 2018.
- 4.1.11 The Expedited Advice Letter was approved by the CPUC on June 13, 2013, and FERC approval was received July 17, 2013.
- 4.1.12 Directly from El Paso.
- 4.1.13 None
- 4.1.14 N/A

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(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.2:**

4.2. With respect to the testimony on page 4, lines 9-12:

- 4.2.1. What portion of 2008 southern system minimum flows was represented by the core's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.2.2. What portion of 2008 southern system minimum flows was represented by the noncore's requirements on an annual average basis, lowest daily share basis, and highest daily share basis?
- 4.2.3. What portion of 2008 southern system minimum flows was represented by the electric generation requirements on an annual average basis, lowest daily share basis, and highest daily share basis?

**RESPONSE 4.2:**

SoCalGas and SDG&E object to these questions on the grounds that they request confidential customer-specific information.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
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(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.3:**

4.3. Please provide the workpapers including all data for Figure 1.

**RESPONSE 4.3:**

Please refer to SoCalGas/SDG&E response to SCGC Data Request #1 which provides the workpapers for Witness Musich.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.4:**

4.4. With respect to the testimony on page 5, lines 8-9:

- 4.4.1. Please provide SoCalGas' forecast of "greater volumes of Southern System support purchases" for the year 2014.
- 4.4.2. Please provide SoCalGas' forecast of "greater volumes of Southern System support purchases" for the year 2015.
- 4.4.3. Please provide SoCalGas' forecast of "greater volumes of Southern System support purchases" for the year 2016.

**RESPONSE 4.4:**

- 4.4.1 No such forecast exists.
- 4.4.2 No such forecast exists.
- 4.4.3 No such forecast exists.

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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.5:**

4.5. With respect to the testimony on page 6, lines 1-2:

- 4.5.1. Please provide SoCalGas' forecast of increased prices during 2014-2016 for natural gas supplies that would be available to the System Operator for Southern System support purchases.
- 4.5.2. Please identify the gas producing areas from which those supplies would be expected to flow.

**RESPONSE 4.5:**

4.5.1 No such forecast exists.

4.5.2 N/A

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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.6:**

4.6. Please provide the workpapers including all data for Figure 2.

**RESPONSE 4.6:**

Please refer to SoCalGas/SDG&E response to SCGC Data Request #1 which provides the workpapers for Witness Musich.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.7:**

4.7. With respect to the testimony on page 7, lines 6-16:

4.7.1. Please identify each of the electric generation projects that is included in the  
“number of gas-fired generation projects proposed for our service territories.”

Please identify the proposed capacity and location of each of these projects

**RESPONSE 4.7:**

SoCalGas and SDG&E object to this request on the grounds that it is unreasonably burdensome. Information about proposed gas-fired electric generation projects is equally available to SCGC on the California Energy Commission (CEC) website, in public filings at the CEC, and in a variety of public sources such as newspapers.



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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.8:**

4.8. If a project obtains the required permits from the CEC, does this guarantee that the project will be completed and brought on line?

**RESPONSE 4.8:**

Please see our response to question 4.7. In addition, questions regarding the scope and nature of CEC permits are more properly addressed to the CEC and the parties obtaining those permits.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
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**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.9:**

4.9. With respect to the testimony on page 8, lines 6-10:

- 4.9.1. Please identify the producing basins that experienced the well freeze-offs during this period.
- 4.9.2. What were the delivery levels at each of the receipt points into SoCalGas' system during the period, February 1-5, 2011?
- 4.9.3. How much gas was withdrawn from storage during this period?

**RESPONSE 4.9:**

- 4.9.1 Please see: <http://www.ferc.gov/legal/staff-reports/08-16-11-report.pdf>
- 4.9.2 Data is available on SoCalGas Envoy website at <https://scgenvoy.sempra.com/>
- 4.9.3. Data is available on SoCalGas Envoy website at <https://scgenvoy.sempra.com/>

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**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.10:**

- 4.10. With respect to the testimony on page 8 lines 11-21:
- 4.10.1. What steps did the System Operator take to procure additional volumes for February 2, 2011?
  - 4.10.2. What volume of gas did the System Operator procure for that date?
  - 4.10.3. What occurrences took place that led the System Operator to conclude that “supplies were being bid away by East-of-California customers served by the apparently more distressed El Paso system”?
  - 4.10.4. What was the demand on the Southern System on February 2, 2011?
  - 4.10.5. What was the amount of flowing gas that SoCalGas was able to divert from the northern part of the system into the Southern System through Chino and/or Prada Stations on that date?

**RESPONSE 4.10:**

- 4.10.1 Please refer to SoCalGas Advice Letter 4282.
- 4.10.2 Please refer to SoCalGas Advice Letter 4282.
- 4.10.3 Please refer to Response 4.9.1. The Hub was unable to obtain all of the supplies requested by the System Operator.
- 4.10.4 For the purposes of this response, SoCalGas and SDG&E define the “Southern System” as the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego. The Southern System demand on 2/2/2011 is estimated at 991 MMcfd.
- 4.10.5 SoCalGas was able to transport 190 million cubic feet (MMCF) of gas to the Southern System via the Chino and Prado crossovers on 2/2/2011.

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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.11:**

4.11. With respect to the testimony on page 9, lines 5-8:

- 4.11.1. If the North-South Pipeline were in place, how long would it take to deliver gas from Honor Rancho into the Southern System?
- 4.11.2. How much gas would be available from Honor Rancho in MDth/day to deliver into the Southern System?
- 4.11.3. How many days could Honor Rancho sustain this level of withdrawal?

**RESPONSE 4.11:**

- 4.11.1 When SoCalGas and SDG&E see a shortfall in supply on the Southern System via the scheduling process, Honor Rancho can contribute to the planned mix of supplies on the Northern System that can be transported on the North-South Pipeline.
- 4.11.2 Please refer to Response 2.10.1 to SCGC's 2<sup>nd</sup> Data Request in A.13-12-013.
- 4.11.3 The Honor Rancho storage field can sustain its maximum deliverability for approximately 20 days, assuming full storage inventory and that it is not replenished.

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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.12:**

- 4.12. With respect to the testimony on page 9, lines 11-16:
- 4.12.1. What was the core gas requirement on the Southern System during January 14-15, 2013?
  - 4.12.2. What was the noncore gas requirement on the Southern System during January 14-15, 2013?
  - 4.12.3. What was the electric generation gas requirement on the Southern System during this period?
  - 4.12.4. What volume of gas was brought into SoCalGas' system through Otay Mesa during this period?
  - 4.12.5. What was the amount of flowing gas that SoCalGas was able to divert from the northern part of the system into the Southern System through Chino and/or Prada Stations during this period?
  - 4.12.6. What volume of gas was brought in across Line 6916 during this period?

**RESPONSE 4.12:**

For the purposes of this response, SoCalGas and SDG&E define the "Southern System" as the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego, and "requirement" as meaning demand.

- 4.12.1 SoCalGas and SDG&E do not estimate separately the core and non-EG noncore Southern System demand. The total core and non-EG noncore demand during this period is estimated at 693 MMCF on 1/14/13 and 686 MMCF on 1/15/13.
- 4.12.2 Please refer to Response 4.12.1.
- 4.12.3 The Southern System electric generation demand during this period was 343 MMCF on 1/14/2013 and 314 MMCF on 1/15/2013.
- 4.12.4 Volumes delivered at Otay Mesa during this period are available on Envoy.

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NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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- 4.12.5 SoCalGas transported 49 MMCF on 1/14/2013 and 45 MMCF on 1/15/2013 to the Southern System via the Chino and Prado crossovers.
  
- 4.12.6 SoCalGas transported 73 MMCF on 1/14/2013 and 66 MMCF on 1/15/2013 on L6916.

**SAN DIEGO GAS & ELECTRIC COMPANY  
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(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.13:**

- 4.13. With respect to the testimony on page 9, lines 18-20:
- 4.13.1. What was the core gas requirement on the Southern System during June 29-July 3, 2013?
  - 4.13.2. What was the noncore gas requirement on the Southern System during June 29-July 3, 2013?
  - 4.13.3. What was the electric generation gas requirement on the Southern System during this period?
  - 4.13.4. What volume of gas was brought into SoCalGas' system through Otay Mesa during this period?
  - 4.13.5. What was the amount of flowing gas that SoCalGas was able to divert from the northern part of the system into the Southern System through Chino and/or Prada Stations during this period?
  - 4.13.6. What volume of gas was brought in across Line 6916 during this period?

**RESPONSE 4.13:**

For the purposes of this response, SoCalGas and SDG&E define the "Southern System" as the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego, and "requirement" as meaning demand.

- 4.13.1 SoCalGas and SDG&E do not estimate separately the core and non-EG noncore Southern System demand. The total core and non-EG noncore demand during this period is estimated at 273 MMCF on 6/29/2013, 277 MMCF on 6/30/2013, 300 MMCF on 7/1/2013, 304 MMCF on 7/2/2013, and 307 MMCF on 7/3/2013.
- 4.13.2 Please refer to Response 4.13.1.
- 4.13.3 The Southern System electric generation demand during this period was 416 MMCF on 6/29/2013, 394 MMCF on 6/30/2013, 464 MMCF on 7/1/2013, 426 MMCF on 7/2/2013, and 329 MMCF on 7/3/2013.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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- 4.13.4 Please refer to Response 4.12.4.
- 4.13.5 SoCalGas transported no volumes to the Southern System via the Chino and Prado crossovers during this period.
- 4.13.6 SoCalGas transported 52 MMCF on 6/29/2013, 50 MMCF on 6/30/2013, 55 MMCF on 7/1/2013, 55 MMCF on 7/2/2013, and 52 MMCF on 7/3/2013 on L6916.



**SAN DIEGO GAS & ELECTRIC COMPANY  
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(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.14:**

- 4.14. With respect to the testimony on page 9, lines 20-23:
- 4.14.1. What was the core gas requirement on the Southern System during August 29-September 6, 2013?
  - 4.14.2. What was the noncore gas requirement on the Southern System during August 29-September 6, 2013?
  - 4.14.3. What was the electric generation gas requirement on the Southern System during this period?
  - 4.14.4. What volume of gas was brought into SoCalGas' system through Otay Mesa during this period?
  - 4.14.5. What was the amount of flowing gas that SoCalGas was able to divert from the northern part of the system into the Southern System through Chino and/or Prada Stations during this period?
  - 4.14.6. What volume of gas was brought in across Line 6916 during this period?

**RESPONSE 4.14:**

For the purposes of this response, SoCalGas and SDG&E define the "Southern System" as the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego, and "requirement" as meaning demand.

- 4.14.1 SoCalGas and SDG&E do not estimate separately the core and non-EG noncore Southern System demand. The total core and non-EG noncore demand during this period is estimated at 236 MMCF on 8/29/13, 183 MMCF on 8/30/13, 194 MMCF on 8/31/13, 213 MMCF on 9/1/13, 242 MMCF on 9/2/13, 240 MMCF on 9/3/13, 246 MMCF on 9/4/13, 240 MMCF on 9/5/13, and 239 MMCF on 9/6/13
- 4.14.2 Please refer to Response 4.14.1.
- 4.14.3 The Southern System electric generation demand during this period was 503 MMCF on 8/29/13, 606 MMCF on 8/30/13, 451 MMCF on 8/31/13, 436 MMCF

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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on 9/1/13, 445 MMCF on 9/2/13, 537 MMCF on 9/3/13, 574 MMCF on 9/4/13, 575 MMCF on 9/5/13, and 515 MMCF on 9/6/13.

- 4.14.4 Please refer to Response 4.13.4.
- 4.14.5 SoCalGas transported 0 MMCF on 8/29/13, 23 MMCF on 8/30/13, 0 MMCF on 8/31/13, 0 MMCF on 9/1/13, 0 MMCF on 9/2/13, 4 MMCF on 9/3/13, 3 MMCF on 9/4/13, 0 MMCF on 9/5/13, and 0 MMCF on 9/6/13 to the Southern System via the Chino and Prado crossovers during this period.
- 4.14.6 SoCalGas transported 53 MMCF on 8/29/13, 60 MMCF on 8/30/13, 60 MMCF on 8/31/13, 60 MMCF on 9/1/13, 41 MMCF on 9/2/13, 46 MMCF on 9/3/13, 52 MMCF on 9/4/13, 46 MMCF on 9/5/13, and 32 MMCF on 9/6/13 on L6916.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.15:**

- 4.15. With respect to the testimony on page 10, lines 2-19:
- 4.15.1. What was the core gas requirement on the Southern System during December 6-11, 2013?
  - 4.15.2. What was the noncore gas requirement on the Southern System during December 6-11, 2013?
  - 4.15.3. What was the electric generation gas requirement on the Southern System during this period?
  - 4.15.4. What volume of gas was brought into SoCalGas' system through Otay Mesa during this period?
  - 4.15.5. What was the amount of flowing gas that SoCalGas was able to divert from the northern part of the system into the Southern System through Chino and/or Prada Stations during this period?
  - 4.15.6. What volume of gas was brought in across Line 6916 during this period?

**RESPONSE 4.15:**

For the purposes of this response, SoCalGas and SDG&E define the "Southern System" as the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego, and "requirement" as meaning demand.

- 4.15.1 SoCalGas and SDG&E do not estimate separately the core and non-EG noncore Southern System demand. The total core and non-EG noncore demand during this period is estimated at 484 MMCF on 12/6/13, 499 MMCF on 12/7/13, 568 MMCF on 12/8/13, 638 MMCF on 12/9/13, 490 MMCF on 12/10/13, and 494 MMCF on 12/11/13
- 4.15.2 Please refer to Response 4.15.1.
- 4.15.3 The Southern System electric generation demand during this period was 347 MMCF on 12/6/13, 338 MMCF on 12/7/13, 418 MMCF on 12/8/13, 284 MMCF on 12/9/13, 291 MMCF on 12/10/13, and 360 MMCF on 12/11/13.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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- 4.15.4 Please refer to Response 4.14.4.
- 4.15.5 SoCalGas transported no volumes to the Southern System via the Chino and Prado crossovers during this period.
- 4.15.6 SoCalGas transported 32 MMCF on 12/6/13, 30 MMCF on 12/7/13, 49 MMCF on 12/8/13, 32 MMCF on 12/9/13, 38 MMCF on 12/10/13, and 49 MMCF on 12/11/13 on L6916.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.16:**

4.16. With respect to the testimony on page 10, lines 9-16:

- 4.16.1. If the North-South Pipeline were in place, how long would it have taken to deliver gas from Honor Rancho into the Southern System in response to the unexpected shortfall on December 9?
- 4.16.2. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?

**RESPONSE 4.16:**

With respect to the testimony on page 10, lines 9-16, SoCalGas and SDG&E do not believe that either the North-South Pipeline nor deliveries from Honor Rancho would have been able to support the Southern System on December 9, 2013. SoCalGas and SDG&E were short of supply across their entire system during that event, and there were no supplies available on its Northern System to transport to the Southern System.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.17:**

4.17. Please provide the workpapers including all data for Figure 3.

**RESPONSE 4.17:**

Please refer to SoCalGas/SDG&E response to SCGC Data Request #1 which provides the workpapers for Witness Musich.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.18:**

4.18. With respect to the testimony on page 16, lines 13-15:

4.18.1. Is it this witnesses' belief that if firm capacity were maintained on El Paso for delivery at Blythe, the capacity holder would be unable to obtain supplies of gas to deliver to Blythe under all circumstances?

4.18.2. If the answer to the previous question is "yes," please provide a copy of all studies, reports, analyses, and communications that supports the witnesses' belief.

4.18.3. Is it this witnesses' belief that if firm capacity were maintained on El Paso for delivery at Blythe, the capacity holder would be unable to obtain supplies of gas to deliver to Blythe under extreme weather circumstances?

4.18.4. If the answer to the previous question is "yes," please define extreme weather circumstances and provide a copy of all studies, reports, analyses, and communications that supports the witnesses' belief.

4.18.5. Is it this witnesses' belief that if firm capacity were maintained on El Paso for delivery at Blythe, the capacity holder would be only able to obtain supplies of expensive gas to deliver to Blythe?

4.18.6. If the answer to the previous question is "yes," please define what would constitute expensive gas and provide a copy of all studies, reports, analyses, and communications that supports the witnesses' belief.

**RESPONSE 4.18:**

SoCalGas and SDG&E object to these questions on the grounds that they are ambiguous and confusing. The questions do not appear to have a direct relationship to the referenced testimony. In addition, the questions ask about a particular witnesses' personal beliefs, then request studies, analyses, etc. from SoCalGas and SDG&E to back up those personal beliefs. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows:

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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Yes, SoCalGas and SDG&E believe there is the potential for both supply and capacity curtailments on upstream pipelines. SoCalGas and SDG&E do not have any studies or analyses forecasting future curtailments and other problems on upstream pipelines. Past operational information for the upstream interstate pipelines is equally available to SCGC.



**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.19:**

4.19. With respect to the testimony on page 17, lines 11-20:

- 4.19.1. How much capacity does SoCalGas believe it would need to hold under a scenario where SoCalGas would “contract for basin supplies and interstate capacity to meet anticipated Southern System flow requirements”?
- 4.19.2. What is the estimated cost associated with holding this level of interstate capacity?
- 4.19.3. What is the estimated cost associated with holding basin supply contracts for this level of capacity?
- 4.19.4. How many times has gas been shut in on the basins serving El Paso’s Southern Mainline during the last five years?

**RESPONSE 4.19:**

- 4.19.1 Based on the forecast presented in the TCAP, we expect future capacity needs to be at least equivalent to current needs.
- 4.19.2 Please refer to El Paso tariffs.
- 4.19.3 SoCalGas has not estimated the premiums necessary for long term supplies to support the Southern System.
- 4.19.4 SoCalGas does not have the requested information about El Paso’s system operations. To the extent this information is public it is equally available to SCGC.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.20:**

4.20. With respect to the testimony on page 21, line 24, and page 22, lines 1-2:

4.20.1. How many times has service been curtailed simultaneously on El Paso's Northern Mainline, El Paso's Southern Mainline, Transwestern, and Questar during the last five years?

4.20.2. How many times has gas been shut in simultaneously on the basins serving El Paso's Northern Mainline, El Paso's Southern Mainline, Transwestern, and Questar during the last five years?

**RESPONSE 4.20:**

4.20.1 SoCalGas and SDG&E object to the question on the grounds that it appears to be misstating the referenced testimony. The referenced testimony does not indicate that all supply basins will be shut in simultaneously. SoCalGas and SDG&E also object to this question on the grounds that it is unreasonably burdensome because it requests interstate pipeline operational information that is equally available to SCGC.

4.20.2 Please refer to Response 4.20.1.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)**

**(4<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

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**QUESTION 4.21:**

4.21. With respect to the testimony on page 22, lines 3-9:

4.21.1. Please explain why the witness believes an option to “fully use existing Southern Zone receipt capabilities” would be valuable given her testimony that supplies delivered at this receipt point will be unavailable in the future.

**RESPONSE 4.21:**

4.21.1 Please refer to Response 2.11.5 to SCGC’s 2<sup>nd</sup> Data Request in A.13-12-013.