**TRIENNIAL COST ALLOCATION PROCEEDING PHASE 1 APPLICATION
OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES EFFECTIVE JANUARY 1, 2016**

(A.14-12-017)

(4th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)
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QUESTION 4.1:

With respect to the response to SCGC-02, Q.2.1.2, in the formula "Cycle 2 (or 1) confirmed receipts – Send out forecast – net withdrawal confirmations from storage accounts in cycle 2 (or 1) = estimated cycle 2 (or 1) withdrawals used for customer balancing", is it SoCalGas' understanding that "net withdrawal confirmation from storage accounts" is always a negative number?

RESPONSE 4.1:

Net withdrawals will always be a negative number.

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QUESTION 4.2:

What is the conversion rate between capacity in MMcfd and energy in dth that SoCalGas believes is correct to use in this proceeding?

RESPONSE 4.2:

This analysis assumed 1.03 dth/mcf, consistent with the average btu content of the storage fields.

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QUESTION 4.3:

With regard to the daily "Forecasted negative imbalance Cycle 2 (Dth)" figures shown in column C of the Excel workbook, "lowOFO backcast scgcdr wactuals.xlsx" that was provided in response to Q.2.1.3:

4.3.1   Selecting a minimum of two days within the most recent six months of the data included in that workbook (in other words corresponding to rows 550-731), please show the mathematical derivation of the figure in column C.

4.3.2   Please show where on Envoy each figure used in the derivation can be obtained, citing the specific file name, page number, and showing the explicit location of the data on the page.

RESPONSE 4.3:

4.3.1
For all rows 550-731, in dths:
Forecasted negative imbalance Cycle 2 =
Minimum [Cyc 1 Confirmed Receipt
- Cyc 1 Forecasted Sendout
+ Cyc 1Confirmed Net Storage Activity
+ 165851
- 0.300 * (Actual Receipt$_{t-2}$ - Cyc 1 Confirmed Receipt$_{t-2}$)
+ 0.302 * (Cyc 5 Scheduled Net Storage Activity$_{t-2}$ - Cyc 1 Confirmed Net Storage Activity$_{t-2}$)
+ 0.337 * (Cyc 3 Scheduled Net Storage Activity$_{t-1}$ - Cyc 1 Confirmed Net Storage Activity$_{t-1}$), 0]

4.3.2

Variable	Webpage	File Name	Page No.	Column
Confirmed Receipt	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	J:K
Actual Receipt	Daily Operations → Archive	daily_operations_m_yyyy.xls	1	P
Forecasted Sendout	OFO Calculation → Archive	ofo_archive_m_yyyy.xls	1	C
Confirmed Net Storage Activity	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	J
Scheduled Net Storage Activity	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	L

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QUESTION 4.4:

With regard to the daily "Forecasted negative imbalance Cycle 3 (Dth)" figures shown in column D of the Excel workbook, "lowOFO backcast scgcdr wactuals.xlsx" that was provided in response to Q.2.1.3:

4.4.1   Selecting a minimum of two days within the most recent six months of the data included in that workbook (in other words corresponding to rows 550-731), please show the mathematical derivation of the figure in column D.

4.4.2   Please show where on Envoy each figure used in the derivation can be obtained, citing the specific file name, page number, and showing the explicit location of the data on the page.

RESPONSE 4.4:

4.4.1
For all rows 550-731, in dths:
Forecasted negative imbalance Cycle 3 =
Minimum [Cyc 2 Confirmed Receipt
- Cyc 2 Forecasted Sendout
+ Cyc 2 Confirmed Net Storage Activity
+ 5598
- 0.239 * (Actual Receipt$_{t-2}$ – Cyc 2 Confirmed Receipt$_{t-2}$)
+ 0.255 * (Cyc 5 Scheduled Net Storage Activity$_{t-2}$ – Cyc 2 Confirmed Net Storage Activity$_{t-2}$)
+ 0.411 * (Cyc 4 Confirmed Net Storage Activity$_{t-1}$ – Cyc 2 Confirmed Net Storage Activity$_{t-1}$), 0]

4.4.2

Variable	Webpage	File Name	Page No.	Column
Confirmed Receipt	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	J:K
Actual Receipt	Daily Operations → Archive	daily_operations_m_yyyy.xls	1	P
Forecasted Sendout	OFO Calculation → Archive	ofo_archive_m_yyyy.xls	1	C
Confirmed Net Storage Activity	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	J
Scheduled Net Storage Activity	Capacity Utilization → Archive	capacity_m_yyyy.xls	1	L

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QUESTION 4.5:

With respect to the response to SCGC-02, Q.2.2.1 in which SoCalGas stated, "SoCalGas has not yet finalized its high OFO forecast methodology:"

4.5.1   When would SoCalGas expect to have its high OFO forecast methodology completed?

4.5.2   Why wouldn't SoCalGas use a high OFO forecast methodology that is analogous to the low OFO forecast methodology that SoCalGas presented in response to SCGC-02, Q.2.1.2, except replacing the term "net withdrawal confirmation from storage accounts in cycle 2 (or 1)" with "net injection confirmation to storage accounts in cycle 2 (or 1)"?

4.5.3   Please send the high OFO forecast methodology to SCGC as soon as it is completed.

RESPONSE 4.5:

4.5.1

SoCalGas expects to have a preliminary new high OFO forecast methodology done before the end of 2015. SoCalGas expects to adjust the methodology to improve its accuracy as time and new data warrant.

4.5.2

SoCalGas will probably use lower intercept terms in equations for high OFO triggering purposes. And, as stated above, the equations in 4.3 and 4.4 may change as new events and data warrant.

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QUESTION 4.6:

With respect to the response to SCGC-02, Q.2.2.4 and Q.2.2.5, if the storage fields were full in late October so the total injection capacity on the system was only 850 MMcfd instead of the 915 MMcfd of nominal summer injection capacity:

4.6.1   Please state the level of firm core injection capacity in MMcfd that would apply in this situation and explain how it would be determined.

4.6.2   Please state the level of firm balancing injection capacity in MMcfd that would apply in this situation and explain how it would be determined.

4.6.3   Please state the level of firm unbundled injection capacity in MMcfd that would apply in this situation and explain how it would be determined.

RESPONSE 4.6:

4.6.1

Assuming the Aliso expansion is in place, a high OFO has been called, and all firm storage customers fully nominate their firm injection rights, then the core would have 68% (388/(388+182)) of capacity after the balancing set aside: 0.68 x (850 – 345) = 344 MMcfd.

4.6.2

If a high OFO were called, then 345 MMcfd. If balancing customers were using less than 345 MMcfd and no high OFO had been called, then we would expect core and unbundled storage customers to be able to more fully utilize their rights of 388 MMcfd and 182 MMcfd, respectively.

4.6.3

Assuming the Aliso expansion is in place, a high OFO has been called, and all firm storage customers fully nominate their firm injection rights, then unbundled storage customers would have 32% (182/(388+182)) of capacity after the balancing set aside: 0.32 x (850 – 345) = 161 MMcfd.