SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
NORTH-SOUTH PROJECT REVENUE REQUIREMENT
(A.13-12-013)
(3RD DATA REQUEST FROM TURN)

QUESTION 1:

Regarding the 19,320 Mdth of gas purchased in the Sept. 2012 to Aug. 2013 time period:

a. Please explain if the purchase time period was related to extreme weather conditions in the winter period

b. Why was the cost of $10.35/Dth so high? Did SoCalGas have any futures positions for deliveries at Blythe during the winter period (Nov. 2012 - Feb. 2013) that helped to moderate these costs? If not, why not?

RESPONSE 1:

a. The purchase time period coincides with the period of SoCalGas' Annual Compliance Reports on Southern System Reliability purchases.

b. The cost of Southern System purchases in that period was not $10.35/dth. The net cost shown is $0.41/dth. SoCalGas did not purchase future positions for deliveries at Blythe during this winter period because the System Operator does not have the regulatory authority to hedge Southern System support purchases with futures positions.

QUESTION 2:

Please confirm that the only curtailment of service for Southern System non-core customers in the last ten years has been of non-core customers that chose low-cost and less-reliable interruptible service. If this is not the case, please provide data on curtailed non-core volumes disaggregated by firm and non-firm.

RESPONSE 2:

Both firm and interruptible service have the same tariff rate.

In the last ten years the Southern System experienced two curtailments which affected transportation service to noncore customers. These curtailments affected both interruptible and firm noncore transportation service customers.

The first curtailment, a localized curtailment as defined in SoCalGas tariff Rule 23.F., occurred on February 3, 2011. The total estimated volume curtailed, i.e. noncore customers asked to reduce or stop consumption, was 200 MMcf, of which approximately 131 MMcf was interruptible service and 69 MMcf was firm service.

The second curtailment, an emergency curtailment as defined in SoCalGas tariff Rule 23.E.and SDG&E tariff Rule 14.G., occurred on February 6, 2014. One interruptible noncore electric generation customer that was in service was asked to fully curtail (stop gas usage), and all other electric generation customers, including both firm and interruptible, were instructed to hold at their current load as it was at the initiation of their curtailment. SoCalGas and SDG&E do not know how much each of those generators would have burned absent the curtailment orders, and therefore cannot reasonably estimate the curtailed volumes and their respective firm and interruptible portions.

QUESTION 3:

Please confirm that one curtailment of non-core customer service in the past ten years was due to a pipeline rupture on SoCalGas' system that could not have been avoided if the North-South pipeline had already been operational.

RESPONSE 3:

SoCalGas and SDG&E object to this question on the grounds that it is vague and confusing. It is unclear to SoCalGas and SDG&E what "rupture" TURN is referring to. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows: Other than pipeline outages resulting from third-party damage, SoCalGas and SDG&E are unaware of any such curtailment of noncore customer service in the past ten years.