

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(DATA REQUEST CAL ADVOCATES-DR-055)

DATA RECEIVED: 3-14-19

DATE RESPONDED: 3-28-19

The following data request questions pertain to Chapter 1 of the Applicants testimony, the Prepared and Direct Testimony of Michelle Dandridge.

QUESTION 1:

For the firm winter withdraw capacity described on page 5 of Ms. Dandridge's testimony, lines 7 - 13, please answer the following questions:

- a. Please explain why the Applicants excluded the winter month of February from the data on system-wide withdrawal capacity;
- b. Please provide the system-wide withdrawal capacity as posted on ENVOY for the month of February for the years 2013 through 2019. Please provide the data in the same Excel spreadsheet format as the "withdrawal winter" tab of Ms. Dandridge's workpapers for Chapter 1.

RESPONSE 1:

- a. The winter months of December and January represent Applicants' peak winter months historically, and the 1-in-35 Peak Day design standard is expected to occur specifically within these two months. Thus, Applicants' assessment was primarily focused on the operationally available withdrawal capacity within these months. See Chapter 1 (Dandridge) at p. 5, lines 13-15, which states that the proposed withdrawal capacity "*should only be reduced in February or March, a period in which the core's need for its full firm rights typically drops several hundred MMcfd as the weather gets warmer.*"
- b. See attachment Cal PA DR55-1b.xlsx.

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QUESTION 2:

For the firm summer withdraw capacity described on page 5 of Ms. Dandridge's testimony, lines 16 – 23, please answer the following questions:

- a. Please provide the system-wide withdrawal capacity as posted on ENVOY for the summer months of April – October in the years 2015 through 2018. Please provide the data in the same Excel spreadsheet format as the "withdrawal summer" tab of Ms. Dandridge's workpapers for Chapter 1.
- b. Explain the Applicants' rationale for using data from the three summers preceding the Aliso Canyon incident versus using data from the three summers following the Aliso Canyon incident;
- c. Clarify how Aliso Canyon's reduced working storage inventory of 68.6 Bcf impacts system-wide withdrawal capacity for the summer months.

RESPONSE 2:

- a. See attachment Cal PA DR55-2a.xlsx.
- b. Applicants used data from the three summer periods preceding the Aliso Canyon incident because that period aligns more closely with Applicants' comprehensive storage proposal based on unrestrictive injection and withdrawal utilization of the Aliso Canyon storage facility. In late January 2016, Aliso Canyon's capacities were discontinued from all future postings within the balance of "Operationally Available Capacity" in ENVOY. Accordingly, any operationally available capacity posted from that time forward represents only what was available at the three remaining storage fields. Applicants do not deem the capacities posted during the three summers following the Aliso Canyon incident as being indicative of what would be available under Applicants' proposals because our proposals are predicated on the balance of four fields working together.
- c. The reduced working storage inventory at Aliso Canyon does not directly tie into Applicants' proposed injection and withdrawal capabilities. For the proposed 2020 TCAP firm injection and withdrawal capacities during the winter and summer months, Applicants analyzed posted injection and withdrawal capacities on ENVOY, and accounted for the reduction in capabilities due to Storage Safety Enhancement Plan safety enhancements.

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QUESTION 3:

As a follow up to the Applicants response to Cal Advocates DR029, Questions 2 and 3, a), please answer the following questions:

- a. Clarify why it is reasonable for the Applicants to establish injection and withdrawal capacities using data prior to the Aliso Canyon well incident when Aliso Canyon's capacity was 86 Bcf and the current maximum allowable operating capacity at Aliso Canyon according to the Applicants' response to Cal Advocates DR 029, Question 1 is 68.6 Bcf.2
- b. Explain why the Applicants did not utilize 2016, 2017 or 2018 injection capacity data as the reference point for their injection recommendation for the 2020 TCAP or withdrawal capacity data from the winters of 2015/2016, 2016/2017 or 2017/2018 as the reference point for their firm winter withdrawal capacity recommendation for the 2020 TCAP.
- c. Explain how the reduced storage inventory of 68.6 Bcf at Aliso Canyon impacts the Applicants' injection and withdrawal proposals for the 2020 TCAP period.

RESPONSE 3:

- a) See Response 2b.
- b) See Response 2b.
- c) See Response 2c.