

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-1

Please provide a detailed description of the data and methodology supporting SoCalGas's proposed allocation to NGV customer class. Please provide all supporting workpapers.

Response 2-1

Please see Chapter 5, Prepared Testimony of Wei Bin Guo, and its workpapers for the detailed description of the data and methodology.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS &
ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND
IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-2

2-2. Please provide a detailed explanation of how SoCalGas differentiates between utility-owned and customer-owned NGV stations to determine its NGV core storage allocation. Please provide all supporting workpapers.

Response 2-2

There is no differentiation between utility-owned and customer-owned NGV stations to determine its NGV core storage allocation. See Response 2-1 for more details.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-3

2-3. Please provide a table reflecting SoCalGas's core storage allocations by customer class as authorized in the prior two cost allocation proceedings.

Response 2-3

SoCalGas's core storage allocations by customer class for last TCAP are detailed in Chapter 5, Prepared Testimony of Wei Bin Guo, and its workpapers on <https://www.socalgas.com/regulatory/A18-07-024>. SoCalGas's core storage allocations by customer class for TCAP filed in 2015 are detailed in Prepared Direct Testimony of Bruce Wetzel and its workpapers on <https://www.socalgas.com/regulatory/A15-07-014>.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Core Nonresidential Transportation Rates

Question 2-4.

2-4. Concerning Table 3, “Core Nonresidential Transportation Rates” in Appendix C to the Application:

- a. Table 3, Column A reflects March 1, 2022 volumes and Column D reflects forecast January 1, 2024 volumes. Please explain whether column D reflects the forecast average for the year, or a 4-year average.

Response 2-4 a.

Applicants object to the extent the question misstates testimony and to the extent the question is vague and ambiguous. Chapter 13, Prepared Direct Testimony of Sharim Chaudhury, Appendix C does not have a Table 3. For the purposes of answering this question, Applicants will assume the question is referring to Chapter 13, Appendix A.

Chapter 13, Appendix A, Table 3, Column A reflects a three-year volumetric average from 2017 to 2019. Chapter 13, Appendix A, Table 3, Column D reflects a four-year volumetric average from 2024 to 2027.

- b. Appendix C, Table 3, Line 34, reflects a forecast decrease in total uncompressed NGV volumes between March 2022 volumes (column A) and January 2024 volumes (column D). Appendix C, Table 3, Line 35 reflects a forecast increase in compressed NGV volumes between March 22 volumes (column A) and January 2024 volumes (column D).

Please provide a detailed description of the assumptions and methodology supporting SoCalGas’s forecast decrease in uncompressed NGV volumes and increase in compressed NGV volumes.

Response 2-4b.

Applicants object to the extent the question misstates testimony and to the extent the question is vague and ambiguous. Chapter 13, Prepared Direct Testimony of Sharim Chaudhury, Appendix C does not have a Table 3. For the purposes of answering this question, Applicants will assume the question is referring to Chapter 13, Appendix A.

Uncompressed volumes for the proposed rates used a 4-year average growth rate (2018-2021) to project future growth (see Chapter 3 Workpapers, page 347). G-NGV customer class volumes declined significantly due to the COVID-19 pandemic resulting in lower volumes for the proposed rate compared to present rates.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Compressed volumes for the proposed rates used a 3-year average growth rate (2019-2021) to project future growth (see Chapter 3 Workpapers, page 347). A reduction in growth rate was applied starting in 2026 in anticipation of limits to station capacity/utilization. Utility station volumes were not adversely impacted due to the COVID pandemic resulting in higher volumes for the proposed rate compared to present rates.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

- c. Please produce all relevant supporting workpapers.

Response 2-4c.

Workpapers for relevant sections are available at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#).

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-5

2-5. Chapter 3, page 9 of the Prepared Direct Testimony of Rose-Marie Payan indicates that SoCalGas expects NGV throughput to increase from 15,252 Mdth in 2021 to 16,136 Mdth in 2024 and 17,311 Mdth by 2027.

- a. Please provide a detailed explanation of the assumptions and methodology supporting SoCalGas's forecast NGV throughput increase.

Response 2-5a.

See response to Question 2-4b.

- b. The forecast increase addressed in Chapter 3 does not align with the forecast NGV volume decrease reflected in Appendix C, Table 3 on Line 46. Please provide a detailed explanation of this apparent discrepancy between the trends and the figures presented.

Response 2-5b.

Chapter 13, Appendix C does not have a Table 3. For the purposes of answering this question, we will assume you are referring to Chapter 13, Appendix A.

See response to Question 2-4a. A comparison of a multi-year average forecast to a single-year forecast is unlikely to result in alignment.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

- c. Please include all supporting workpapers.

Response 2.5c.

Workpapers for relevant sections are available at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#).

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-6

2-6. Does SoCalGas expect to open additional public-access NGV stations between 2023 and 2027?

Response 2-6

No, SoCalGas does not expect to open additional public-access NGV stations between 2023 and 2027.

- a. Please provide a detailed explanation in support of these expectations.

Response 2-6a.

SoCalGas has not requested capital funding for additional public-access NGV stations in the most recent General Rate Case proceeding. As a result, SoCalGas does not expect to construct any new public-access NGV stations between 2023 and 2027.

- b. If SoCalGas does expect to open additional public-access NGV stations:

Response 2-6b.

See response to Question 2-6.

- i. Please provide list of those stations, their locations, and expected operation dates.

Response 2-6bi.

Not applicable.

- ii. Please explain why Workpaper NGV-2 table 2 does not reflect any additional public-access stations through 2035.

Response 2-6bii.

Not applicable.

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-7

2-7. Workpaper NGV-2, supporting Chapter 3, reflects that SoCalGas forecasts an increase in uncompressed meter counts between 2023 and 2027. Workpaper NGV-2 also reflects that SoCalGas forecasts an increase in compressed Fleet meter counts and expects public-access meter counts to remain steady over that same time period.

- a. Please provide a detailed explanation of the relationship between the forecast increase in uncompressed NGV meter counts reflected in Workpaper NGV-2 and the forecast decrease in uncompressed NGV volumes reflected in Appendix C, Table 3 on Line 34.

Response 2-7a.

Chapter 13, Appendix C does not have a Table 3. For the purposes of answering this question, we will assume you are referring to Chapter 13, Appendix A.

The meter count forecast in Workpaper NGV-2 was performed separately from the volume forecast (see Chapter 3 Workpapers, page 345 to page 346).

- b. Please provide a detailed explanation of the relationship between the forecasts for compressed fleet and public access NGV meters and forecast increase in compressed NGV volumes reflected in Appendix C, Table 3.

Response 2-7b.

Chapter 13, Appendix C does not have a Table 3. For the purposes of answering this question, we will assume you are referring to Chapter 13, Appendix A.

The meter count for public access NGV stations remained constant over the forecast period and did not impact the associated volume forecast. The meter count for private NGV stations was based on anticipated utility fleet NGV purchases that impacted both the number of private stations (meter count) and volume over the forecast period (see Chapter 3 Workpapers, page 345 to page 348).

- c. Please provide all supporting workpapers.

Response 2-7c.

Workpapers for relevant sections are available at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#).

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-8

2-8. Chapter 5, Direct Testimony of Wei Bin Guo, page 8 reflects that SoCalGas forecasts NGV annual average meter counts to increase from 373 to 393.

- a. Please provide a detailed explanation of the data and methodology supporting this forecast.

Response 2-8a.

Meter counts for the proposed rates used a 4-year average growth rate (2018-2021) to project future growth (see Chapter 3 Workpapers, page 347). A reduction in growth rate was applied starting in 2026 since meter counts do not increase as quickly as volume.

- b. Please provide all supporting workpapers.

Response 2-8b.

Workpapers for relevant sections are available at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#).

APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

DATA REQUEST SET 2 FROM CLEAN ENERGY DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

Question 2-9

2-9. Chapter 9, Direct Testimony of Marjorie Schmidt-Pines addresses cost allocation to individual customer classes. Concerning the costs allocated to the NGV customer class:

- a. Please provide a detailed explanation of how SoCalGas differentiates between the costs to serve stations not available to the public, costs to serve public-access NGV stations, and customer-owned NGV stations.

Response 2-9a.

There is no differentiation between the uncompressed commodity charge and transportation charge to serve NGV stations owned by the utility or by customers. The only differentiated charge is the G-NGV compression surcharge that is only applied to utility owned public access NGV stations. As stated in Chapter 13, page 29, “A compression surcharge or compression rate adder is intended to cover the cost of providing compressed natural gas (CNG) to motor vehicles fueling at public access CNG vehicle refueling stations owned and operated by Applicants. The compression rate adder is charged to customers on a volumetric basis. This adder is incremental to the uncompressed commodity charge and transportation charge.”

- b. Please provide a detailed explanation of what public-access station costs are reflected in uncompressed rates.

Response 2-9b.

No public-access station costs are reflected in uncompressed rates.

- c. Please provide all supporting workpapers.

Response 2-9c.

Workpapers for relevant sections are available at A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas: [Chapter-9.pdf \(socialgas.com\)](#). [Chapter-13.pdf \(socialgas.com\)](#)