

**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 1 FROM CITY OF LONG BEACH DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

REQUEST 1

Regarding SoCalGas' proposal to use 92.06 Billion Cubic Feet ("Bcf") of total inventory capacity (Chapter 1 (Rincon & Yen) at pg. 2, lines 21-23), has the Commission authorized Aliso Canyon to operate at 41.16 Bcf through the CAP period (2024-2027)? If not, how might the authorized inventory at Aliso Canyon change during the CAP period? Please describe any of SoCalGas' assumptions to Aliso Canyon's capacity made in its proposal, including how any increases to Aliso Canyon's maximum capacity (e.g., 68.6 Bcf) would impact SoCalGas' proposal.

CONFIDENTIAL (yes or **no):**

RESPONSE 1

As of May 9 2023, there are no changes to the authorized capacity at Aliso described in section III. A of chapter 1, Prepared Direct Testimony of Manuel Rincon and Jimmy Yen. On April 19, 2023, SoCalGas and SDG&E filed a Petition for Modification of D.21-11-008. which set the interim range of Aliso Canyon storage capacity at zero to 41.16 Bcf, requesting the Commission take expedited action to increase the inventory at Aliso Canyon to 68.6 Bcf.

SoCalGas does not know how the authorized capacity at Aliso may change during the CAP period. For the proposal presented in Chapter 1, SoCalGas assumed that the authorized capacity at Aliso could change during the TCAP period. The proposals in Chapter 1 will not be affected by changes in the authorized capacity at Aliso.

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REQUEST 2

How many days during the winter months of November 2022 to March 2023 met the conditions set by the Aliso Canyon Withdrawal Protocol?

CONFIDENTIAL (yes or **no):**

RESPONSE 2

The data is publicly posted on SoCalGas EBB Envoy (<https://www.socalgas-envoy.com/>) where historical data can be downloaded as an Excel file from Archive. See screenshots below.

	Timely	Evening	Intraday 1	Intraday 2	Intraday 3
OFO Declared:	No OFO	No OFO	No OFO	No OFO	No OFO
Stage:					
Tolerance %:					
Aliso Protocol:	Not Met	Not Met	Not Met	Not Met	Not Met
Forecasted Total Daily Customer Imbalance	N/A	0	0	N/A	N/A
Storage Withdrawal Limit For Balancing	167,770	167,770	167,770	167,770	167,770
Excess Storage Withdrawal For Balancing:	N/A	0	0	N/A	N/A

	Timely	Evening	Intraday 1	Intraday 2	Intraday 3
OFO Declared:	No OFO	No OFO	No OFO	No OFO	No OFO
Stage:					
Tolerance %:					
Aliso Protocol:	Not Met	Not Met	Not Met	Not Met	Not Met
Forecasted Total Daily Customer Imbalance	N/A	0	0	N/A	N/A
Storage Withdrawal Limit For Balancing	167,770	167,770	167,770	167,770	167,770
Excess Storage Withdrawal For Balancing:	N/A	0	0	N/A	N/A

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REQUEST 3

During the winter months of November 2022 to March 2023, what was the average withdrawal capacity made available to customers:

- a. On days that met the Aliso Canyon Withdrawal Protocol
- b. On days that did not meet the Aliso Canyon Withdrawal Protocol

CONFIDENTIAL (yes or no):

RESPONSE 3

SoCalGas posts the withdrawal capacity made available to customers on the Capacity Utilization report. The data is publicly posted on SoCalGas EBB Envoy (<https://www.socalgas-envoy.com/>). The dates when the Aliso Protocol was triggered can be found using the method described in Response 2. Historical data can also be downloaded as an Excel file in the archive section. See screenshots below.

Receipt Point	Latest On-System Gross Operating Capacity (Dth)	Latest Scheduled (Dth)		Minimum Flow Requirement	On-System (Dth)		Off-System (Dth)
		On-System	Off-System		Operating Capacity	Gross Operating Capacity	Operating Capacity
Total L&S, N Coastal, & Other CA Production	343,929	89,304		0	343,000	343,929	
Line 85	66,179	66,179		0	66,000	66,179	
North Coastal	165,447	12,313		0	165,000	165,447	
Other	112,303	10,812		0	112,000	112,303	
Total South Desert	961,596	632,573	0	650,757	959,000	961,596	0
Blythe	972,626	632,573	0	0	970,000	972,626	0
El Paso - Ehrenberg	1,252,381	632,573	0	0	1,249,000	1,252,381	0
NBP - Blythe	622,681	0	0	0	621,000	622,681	0
TGN - Otay Mesa	415,121	0	0	0	414,000	415,121	0
Total North Desert	1,292,490	1,152,368	0	0	1,289,000	1,292,490	0
Needles/Topock Area	858,317	820,556	0	0	856,000	858,317	0
Topock	361,977	330,039	0	0	361,000	361,977	0
El Paso - Topock	553,494	312,993	0	0	552,000	553,494	0
Transwestern - Topock	309,837	17,046	0	0	309,000	309,837	0
North Needles	827,234	490,517	0	0	825,000	827,234	0
Transwestern - Needles	827,234	490,517	0	0	825,000	827,234	0
Southern Trails- Needles	0	0	0	0	0	0	0
Kern River/Mojave - Kramer Junction	579,565	331,812	0	0	578,000	579,565	0
Kern River - Kramer Junction	579,565	326,235	0	0	578,000	579,565	0
Mojave - Kramer Junction	579,565	5,577	0	0	578,000	579,565	0
Total Wheeler Ridge	842,274	716,930	0	0	840,000	842,274	0
Kern River/Mojave	842,274	562,157	0	0	840,000	842,274	0
Kern River - Wheeler Ridge	842,274	533,636	0	0	840,000	842,274	0
Mojave - Wheeler Ridge	842,274	28,521	0	0	840,000	842,274	0
North - Wheeler Ridge	570,540	154,773	0	0	569,000	570,540	0
Pacific Gas & Electric	568,535	134,773	0	0	567,000	568,535	0
Elk Hills	173,468	20,000		0	173,000	173,468	
Total:		2,591,175	0				
Forecasted Send Out						3,376,116	
Total Net System Capacity						3,640,116	
Total Off-System Capacity						0	
Storage Withdrawal Capacity						2,103,000	
Net Storage Withdrawal Capacity						1,745,490	

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Receipt Point	Latest Scheduled (Dth)		On-System (Dth)				Off-System (Dth)		Se
	On-System	Off-System	Minimum Flow Requirement	Operating Capacity	Gross Operating Capacity	Operating Capacity	Confirmed (Dth)		
	On-System	Off-System	On-System	Off-System	On-System	Off-System	On-System		
Total LBS, N Coastal, & Other CA Production	343,929	89,304	0	343,000	343,929		89,304	89	
Line 85	66,179	66,179	0	66,000	66,179		66,179	66	
North Coastal	165,447	12,313	0	165,000	165,447		12,313	12	
Other	112,303	10,812	0	112,000	112,303		10,812	10	
Total South Desert	961,596	632,573	0	650,757	959,000	961,596	0	632	
Blythe	972,626	632,573	0	0	970,000	972,626	0	632	
El Paso - Ehrenberg	1,252,381	632,573	0	0	1,249,000	1,252,381	0	632	
NBP - Blythe	622,681	0	0	0	621,000	622,681	0	0	
TON - Otay Mesa	415,121	0	0	0	414,000	415,121	0	0	

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REQUEST 4

How many days during the summer months of April 2022 to October 2022 met the conditions set by the Aliso Canyon Withdrawal Protocol?

CONFIDENTIAL (yes or **no**):

RESPONSE 4

See Response 2. SoCalGas has not done the requested analysis.

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SO CAL GAS RESPONSE DATED: MAY 23, 2023

REQUEST 5

During the summer months of April 2022 to October 2022, what was the average withdrawal capacity made available to customers:

CONFIDENTIAL (yes or **no):**

- a. On days that met the Aliso Canyon Withdrawal Protocol

RESPONSE 5a

See Response 3. SoCalGas has not done the requested analysis.

- b. On days that did not meet the Aliso Canyon Withdrawal Protocol

RESPONSE 5b

See Response 3. SoCalGas has not done the requested analysis.

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REQUEST 6

SoCalGas' proposes to reduce inventory allocation to core customers from 82.5 Bcf to 72 Bcf.

- a. Would this reduce allocated inventory to wholesale core customers who would continue to receive 3% of the core allocation (Chapter 1 (Rincon & Yen) at pg. 7, lines 1-3)?
- b. If the answer to part (a) above is yes, please justify this proposed decrease.

CONFIDENTIAL (yes or **no**):

RESPONSE 6a

Yes.

RESPONSE 6b

SoCalGas does not differentiate amongst core customers.

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REQUEST 7

Does SoCalGas propose to eliminate the unbundled storage program? Why or why not?

CONFIDENTIAL (yes or **no**):

RESPONSE 7

SoCalGas is not allocating any capacity to the Unbundled Storage Program in this CAP. Instead, SoCalGas proposal allocates the capacity to the Balancing Plus program.

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REQUEST 8

Please describe the differences between the services offered for sale under the unbundled storage program and the proposed Balancing Plus storage program (Chapter 1 (Rincon & Yen) at pg. 7, starting at line 6).

CONFIDENTIAL (yes or **no):**

RESPONSE 8

The services provided to Balancing Plus buyers are equal to those provided to previous buyers of Unbundled Storage; however, Unbundled Storage sales are done bilaterally, while under the Balancing Plus Program, sales are made exclusively via auction as described in the proposal. The treatment of unsold assets also differs. Under the proposal, unsold Balancing Plus assets are made available to balancing customers as explained in Chapter 1, Direct Prepared Testimony of Manuel Rincon and Jimmy Yen, at page 8, starting on line 4. Unsold Unbundled Storage assets were not made available for balancing.

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REQUEST 9

Please explain why the proposal described under “Additional Scenarios” (Chapter 1 (Rincon & Yen) at pg. 13, starting at line 10) is superior to how storage allocations change based on Aliso Canyon operating conditions as authorized currently under D.20-02-045.

CONFIDENTIAL (yes or **no):**

RESPONSE 9

Unlike D.20-02-045, the proposal described in “Additional Scenarios” treats all customers equally by allocating additional available storage capacities to all customer classes. If a customer has a greater need for storage, the customer may purchase it via auction through the Balancing Plus Program.

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REQUEST 10

Please describe in detail which aspects of SoCalGas' proposals require system enhancements to the SoCalGas Envoy and Special Contract Billing Systems (Chapter 1 (Rincon & Yen) at pg. 16, lines 5-6).

CONFIDENTIAL (yes or **no):**

RESPONSE 10

All changes described in Chapter 1, Direct Prepared Testimony of Manuel Rincon and Jimmy Yen, with the exception of the change in the Standard Procurement Rate described in section VIII require enhancements.

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REQUEST 11

Please refer to the proposed attrition mechanism for embedded costs (Chapter 8 (Seres) at pg. 19, lines 9-17)

- a. Please confirm that the escalation applied to embedded costs would exclude any capital exceptions as indicated on pg. 19, footnote 61.
- b. Does SoCalGas propose to use the escalation factors adopted by the Commission in its 2024 GRC (A.22-05-015) if they differ from those proposed in Khai Nguyen's testimony? Why or why not?
- c. Would the escalation rates apply to the \$2.1 million embedded cost of the Aliso Canyon Turbine Replacement shown in Table 22?

CONFIDENTIAL (yes or no)

RESPONSE 11a

Yes, the escalation applied to the embedded costs would exclude the capital exceptions in Khai Nguyen's PTY testimony. Footnote 61 in Chapter 8 reflects IHS/Markit Global Insight escalation factors which are consistent with Scott Wilder's 2024 GRC Cost Escalation testimony (SCG-36 at SRW-5) and the escalation rates used by the PTY testimony.

RESPONSE 11b:

Chapter 8 (Seres) proposal reflects cost escalation factors that are consistent with the 2024 GRC cost escalation as proposed by Scott Wilder. It does not include the capital exceptions that are part of Khai Nguyen's PTY testimony because the PTY testimony focuses on the overall revenue requirement increase which includes cost escalation along with capital exception adders.

RESPONSE 11c:

Yes