

**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)

(2nd DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

DATA RECEIVED: 1-15-19

DATE RESPONDED: 1-31-19

SUPPLEMENTAL DATE RESPONDED: 2-13-19

QUESTION 2.4:

With respect to the statement on page 12 of Dandridge Direct Testimony: "With 8% monthly balancing, the maximum amount of inventory needed for balancing is 8% of monthly send out. Using historical data over the January 2013 - December 2017 period, 8% of the actual monthly send out ranged from 5 Bcf to 8 Bcf. We estimate that 8 Bcf of inventory space will cover any positive cumulative imbalances, and another 8 Bcf of inventory space and its gas supply will cover any negative cumulative imbalances, hence we propose a total of 16 Bcf storage inventory for balancing."

- 2.4.1. Please provide a copy of historical data in Excel format over the January 2013-December 2017 that was referenced in this discussion.
- 2.4.2. Please provide a copy of each study, memorandum, or report that discusses the need for storage inventory for the balancing function.
- 2.4.3. Please provide a copy of each study, memorandum, or report that discusses the amount of storage inventory needed for the balancing function.
- 2.4.4. Please provide a copy of each study, memorandum, or report that discusses the need for storage inventory to cover negative cumulative imbalances.
- 2.4.5. Please provide a copy of each study, memorandum, or report that discusses the need for storage inventory to cover positive cumulative imbalances.

ORIGINAL RESPONSE 2.4:

- 2.4.1. Please refer to the Chapter 1 workpapers, sheet "Monthly % INV assessment."
- 2.4.2. Please refer Chapter 1 Section VI. Furthermore, high inventory balancing is needed as is shown in response 2.4.1, and low inventory balancing is needed as can be seen in ENVOY, Cumulative Customer Imbalance position. For example, customers were in a cumulative negative imbalance position in March'17, at negative 5.4 Bcf, and a positive 7.3 Bcf in August'18. The current balancing rules allow for each customer an 8% monthly imbalance.
- 2.4.3. Please refer to Response 2.4.2.
- 2.4.4. Please refer to Response 2.4.2.
- 2.4.5. Please refer to Response 2.4.1.

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SUPPLEMENTAL RESPONSE 2.4 (subparts 2.4.2 through 2.4.5):

- 2.4.2. Aside from Chapter 1 and accompanying workpapers referenced in Response 2.4.1, Applicants do not have any additional studies, memoranda, or reports that discuss the need for storage inventory for the balancing function. The original response also provided additional information related to cumulative imbalances from Envoy.
- 2.4.3. Aside from Chapter 1 and accompanying workpapers referenced in Response 2.4.1., Applicants do not have any additional studies, memoranda, or reports that discuss the amount of storage inventory needed for the balancing function. The original response also referenced additional information related to cumulative imbalances from Envoy.
- 2.4.4. Aside from Chapter 1 and accompanying workpapers referenced in Response 2.4.1., Applicants do not have any studies, memoranda, or reports that discuss the need for storage inventory to cover negative cumulative imbalances. The original response also referenced additional information related to cumulative imbalances from Envoy.
- 2.4.5. Aside from Chapter 1 and accompanying workpapers referenced in Response 2.4.1., Applicants do not have any studies, memoranda, or reports that discuss the need for storage inventory to cover positive cumulative negative imbalances.