

**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

QUESTION 2.1:

In A.14-12-017, SoCalGas provided SCGC in response to SCGC-01, Q.1.1, with the following data regarding its daily storage capacity in Excel format:

- 2.1.1. Daily winter injection capacity for 11/1/2010-3/31/2014—please extend this data through the winter of 2017/2018.
- 2.1.2. Daily summer injection capacity for 4/1/2014-10/31/2014—please extend this data through the summer of 2018.
- 2.1.3. Daily summer withdrawal capacity for 4/1/2012-10/31/2014—please extend this data through the summer of 2018.
- 2.1.4. Please also provide daily winter withdrawal capacity for the winters of 2012/2013, 2013/2014, 2014/2015, 2015/2016, 2016/2017, 2017/2018.

We have attached a copy of the workbook provided in A.14-12-017 for your reference.



Attachment.xlsx

RESPONSE 2.1:

See attached excel workbook tabs for response 2.1.1 through 2.1.4.



SCGC-02-21

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QUESTION 2.2:

Please provide copies of the 2015, 2016, and 2017 Annual Reports to the CPUC for SoCalGas and for SDG&E's gas division.

RESPONSE 2.2:

See attached copies.



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QUESTION 2.3:

With respect to the statement on page 14 of Dandridge Direct Testimony: “21 Bcf will provide the inventory required to provide a withdrawal deliverability of 1,240 MMcfd for all customers on the system, on a year-round basis.”

- 2.3.1. Please provide a copy of each study, memorandum, or report that discusses the need for 21 Bcf in inventory in order to meet a withdrawal deliverability of 1,240 MMcfd.
- 2.3.2. Table 3 shows the proposed summer withdrawal capacity of 840 MMcfd and a proposed winter withdrawal capacity of 400 MMcfd for the balancing function. Under the Applicants’ proposal noncore customers can only utilize storage capacity for balancing purposes, why is it appropriate for noncore customers to pay for storage inventory required to provide 1,240 MMcfd of withdrawal capacity?
- 2.3.3. If under the Applicants’ proposal 16 Bcf of storage inventory is dedicated to the balancing function, why doesn’t this 16 Bcf represent sufficient inventory to support the 840 MMcfd of summer withdrawal capacity and 400 MMcfd of winter withdrawal capacity that is dedicated to the balancing function?

RESPONSE 2.3:

- 2.3.1. The discussion of the need for the 21 Bcf in inventory resides in the TCAP testimony. Additional discussions may reside in prior data request responses. For example, please see responses to data request from Indicated Shippers, Set #1 (including, Q7) for additional discussion
- 2.3.2.&
- 2.3.3. The 21 Bcf of storage inventory allocated to the new reliability function provides a withdrawal capacity of 1,240 MMcfd on a year-round basis, which is to accommodate both core and balancing withdrawal. This is split in the 151 days of winter by 840 MMcfd for Core Reliability and 400 MMcfd for balancing, and the 214 days of summer by 400 MMcfd for Core Reliability and 840 MMcfd for balancing. Additionally, noncore customers will pay for only a portion of the balancing function. Therefore, noncore customers are not paying for the inventory required to produce 1,240 MMcfd of withdrawal capacity, but rather only a portion of the inventory required to provide withdrawal for the noncore portion of the balancing function. This allows the balancing function to continue to withdraw at the firm rate for summer or winter until the remaining

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inventory for the balancing function is 0 Bcf. Without the new reliability function, if the remaining inventory for balancing is 0 Bcf, there would not be sufficient withdrawal for the balancing function.

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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.

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.