

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 CITY OF LONG BEACH DATED MAY 9, 2023

SOCALGAS RESPONSE DATED: MAY 23, 2023

REQUEST 2-1

Please provide copies of the attachments to all data request responses issued to other parties in this proceeding.

CONFIDENTIAL (yes or no):

RESPONSE 2-1

PROTECTED MATERIALS: PROVIDED PURSUANT TO NON-DISCLOSURE

AGREEMENT IN A.22-09-015

The following highlighted files with confidential information and are being provided pursuant to the non-disclosure agreement executed on May 22, 2023, between SoCalGas and City of Long Beach in A.22-09-015:

- a) Please refer to the following list of executable versions of SoCalGas and SDG&E's supporting workpapers in native format:
- Ch 1 Rincon-Yen Storage Overview and Proposal
 - Ch 2 Guo_SCG_weather_design
 - Ch 2 Guo_SCG_peak_day_design
 - Ch 2 Guo_SDGE_weather_design
 - Ch 2 Guo_SDGE_peak-day_design
 - Ch 4 Huang Large EG Cogen
 - Ch 5 Guo_Scg_MDM_Summary_wp
 - Ch 5 Guo_Scg_noncore_Com_wp
 - Ch 5 Guo_Scg_noncore_Ind_wp
 - Ch 5 Guo_ScgRefinery_wp
 - Ch 5 Guo_ScgSmCoGen_wp
 - Ch 5 Guo_Sdge_MDM_Summary_wp
 - Ch 8 Seres Embedded Costs
 - Ch 9_SCG 2024TCAP LRMC Customer Costs
 - Ch 9_SCG 2024TCAP LRMC Distribution Costs
 - Ch 9_SCG 2024TCAP LRMC OM loader
 - Ch 9_SCG 2024TCAP LRMC Customer Costs with SC Summary
 - Ch 9_SCG Cost Allocation workpapers
 - Ch 9_SCG First Page Flowchart Cost Allocation
 - Ch 9_SCG Rate Base 2021 - SRM
 - Ch 10_SDG&E Cost Allocation
 - Ch 10_SDGE 2024TCAP LRMC Customer Costs
 - Ch 10_SDGE 2024TCAP LRMC Customer Costs Min

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- Ch 10_SDGE 2024TCAP LRMC Distribution Costs
- Ch 10_SDGE 2024TCAP LRMC OM Loader
- Ch 10_SDGE 2024TCAP Misc Data
- Ch 10_SDGE Rate Base – 2021 SRM
- Ch 12 Harte H2 Fueling Station Rate
- Ch13_Gas Rates SDGE – TCAP
- Ch13_Gas Rates SCG - TCAP
- Ch13_Partial Electrification, Fixed Charge and CARE Bill – SoCalGas
- Ch 13 SCG TCAP Bill Impact Summary - CARE - Half Vol 10% Cust Red
- Ch13_SCG 2022 PPPS Rate Model – Final
- Ch13_SCG 2024 TCAP NGV Compression Rate Adder
- Ch13_SCG 2024 TCAP Submeter Credit
- Ch13_SCG TCAP Bill Impact Summary – CARE - 15
- Ch13_SCG TCAP Bill Impact Summary – CARE - 120
- Ch13_SCG TCAP Bill Impact Summary – CARE
- Ch13_SDG&E 2024 TCAP NGV Compression Rate Adder
- Ch13_SDG&E 2024 TCAP Submeter Credit
- Ch13_Table 5
- Ch13_Tables 8 and 9
- Protected Material_Ch 3 Payan Gas Price Forecast 2024 to 2027 (Confidentiality Declaration provided)
- Protected Material_Ch 3 Payan Gas Price Forecast Feb 2023 (Confidentiality Declaration provided)

b) Please refer to the following list of digital files for Clean Energy:

- Clean Energy-01 SDG&E Q8E A9E
- Clean Energy-01 SCG Q8E A9E
- Clean Energy-01_Q5
- Clean Energy-01_Q15b
- Clean Energy-01_Q15c
- Clean Energy-01_Q20
- Clean Energy-01_Q21
- Protected_Material_Clean Energy-01_Q3_Q4

c) Please refer to the following list of digital files for California Manufacturers & Technology Association (CMTA):

- CMTA-01 3c ii and iii
- CMTA-01 3c i SDG&E
- CMTA-01 3c i SoCalGas

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- CMTA-01 Q3 a and b
 - CMTA-DR-01 Q2
- d) Please refer to the following list of digital files for Indicated Shippers (IS):
- IS-03_Q3-13
- e) Please refer to the following list of digital files for Southern California Gas Coalition (SCGC):
- SCGC DR-07_Q7.1-SDG&E Capacity Reports (10 reports)
 - SCGC-02_Q1
 - SCGC-06_Q6.1.1
 - SCGC-06_Q6.3.3_FERC O&M A&G
 - SCGC-08_Q2
 - Protected Material_SCGC-04_Q3
 - Protected Material_SCGC-04_Q4
 - Protected Material_SCGC-05_Q3_Final Report Phase A1 – August 29, 2022
- f) Please refer to the following list of digital files for TURN:
- TURN 2 -Q3
 - TURN 2 -Q23
 - TURN 2 -Q2
 - TURN 2 -Q4
 - TURN 2 -Q6
 - TURN 2 -Q25
 - TURN 2 -Q27
 - TURN 2 -Q28
 - TURN 2 -Q5
 - TURN-04_Q12
 - TURN-04_Q20b
 - TURN04_Q14-SCG_Storage
 - ferc_scg_annual_rpt_2022
 - SDG&E – Form 1 & 2 2022
 - Protected Material_TURN-02_Supplemental2_Q27-Q29

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REQUEST 2-2

Regarding the proposal to allocate the revenues recorded in the Balancing Plus Services Memorandum Account (“BPSMA”) using each class’s share of average year throughput (Chapter 13 (Chaudhury) at pg. 32, lines 3-8), which is the same method used for allocating load balancing costs:

- a. Is this allocation method consistent with how SoCalGas proposes to allocate the balancing plus function embedded storage costs?
 - i. If so, please explain if there are any differences between the allocation of the load balancing function and balancing plus function embedded storage costs.
 - ii. If not, please explain how SoCalGas proposes to allocate the embedded storage costs allocated to the balancing plus function and to justify this allocation, and why it should be different from the allocation of revenues recorded in the BPSMA.

CONFIDENTIAL (yes or **no):**

RESPONSE 2-2 a.

Yes

RESPONSE 2-2 ai.

There are no differences.

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REQUEST 2-3

Please refer to discussion of SoCalGas' proposed winter withdrawal capacity to core customers (Chapter 1 (Rincon & Yen) at pg. 6, lines 8-21.

CONFIDENTIAL (yes or **no):**

a. How much flowing supply is forecast to be available to meet the 3,355 Million Cubic Feet per day ("MMcf/d") 1-in-35 peak cold day demand in the CAP period (2024-2027)?

RESPONSE 2-3 a.

SoCal Gas did not forecast available flowing supply or conducted any resource adequacy study for the purpose of Chapter 1, Direct Testimony of Manuel Rincone & Jimmy Yen of the Cost Allocation proceeding.

b. Is 1,140 MMcf/d of winter withdrawal capacity adequate to meet the 1-in-35 peak cold day demand in addition to available flowing supply?

RESPONSE 2-3 b.

See Response 2-3 a.

c. Is 1,880 MMcf/d of winter withdrawal capacity adequate to meet the 1-in-35 peak cold day demand in addition to available flowing supply?

RESPONSE 2-3 c.

See Response 2-3 a.

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REQUEST 2-4

Reference Chapter 1 (Rincon & Yen) at pg. 9, lines 14-18: “Therefore, under the current end of the month constraint customers can inject 12,000 MMcf of imbalance gas over a storage cycle by moving from an aggregate negative imbalance position of 6,000 MMcf to an aggregate positive imbalance position of 6,000 MMcf. Imbalance customers, then, have effective command over 12,000 MMcf of storage capacity, an amount that significantly exceeds their current storage allocation.”

CONFIDENTIAL (yes or **no):**

a. Did storage customers ever inject 12,000 MMcf of imbalance gas over a storage cycle at any point between April 2021 to March 2022?

RESPONSE 2-4 a.

Between April 2021 and March 2022 imbalance customers moved from a negative imbalance position of 2,059,496Dth on 10/23/2021 to a positive position imbalance position of 8,523,874Dth on 01/21/2022 suggesting net injections over the period of 10,583,370Dth, a volume lower than 12,000MMcf.

i. If so, please provide the relevant data showing that this occurred and when.

RESPONSE 2-4 ai.

The data is available in the following links:

- [10/23/2021 \(socalgas-envoy.com\)](https://socalgas-envoy.com/10/23/2021)
- [01/21/2022 \(socalgas-envoy.com\)](https://socalgas-envoy.com/01/21/2022)

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REQUEST 2-5

Reference Chapter 1 (Rincon & Yen) at pg. 10, lines 8-10: “As explained in the Core Storage Allocation Section, core customers may require access to their full assets to meet a 1-in-35 cold year demand. Under the current regime, some of those assets may be utilized by balancing customers.”

CONFIDENTIAL (yes or no):

- a. Please define the term “assets” as used in this quote.

RESPONSE 2-5 a.

Gas in a storage account.

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REQUEST 2-6

SoCalGas discusses how injection capacity depends on storage inventory levels (Chapter 1 (Rincon & Yen) at pg. 3).

- a. Does withdrawal capacity similarly depend on inventory level? If so, what inventory level is needed to support the withdrawal capacity needed to meet a core 1-in-35 peak cold day demand of 3,355 MMcf/d? Assume for purposes of this question that the Aliso Canyon Withdrawal Protocol allows withdrawal from Aliso Canyon.

CONFIDENTIAL (yes or **no):**

RESPONSE 2-6

Yes. Demand can be met with storage withdrawals or flowing supply. Therefore, the withdrawal and the inventory needed to meet a cold day demand of 3,355 MMcf/d will also depend on the available flowing supply. As stated in response 2-3, SoCal Gas did not forecast available flowing supply or conducted any resource adequacy study for the purpose of Chapter 1, Direct Testimony of Manuel Rincon & Jimmy Yen of the Cost Allocation proceeding.

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REQUEST 2-7

Reference Chapter 1 (Rincon & Yen) at pg. 10, lines 14-17: “Yet, from November 1 to the end of March balancing customers could have withdrawn about 11,500 MMcf by potentially moving from a positive imbalance of 5,600 MMcf to a negative imbalance of 5,900 MMcf, which would have included gas stored by other customers.”

a. Please confirm the 11,500 MMcf withdrawal did not occur and that SoCalGas is only referencing a hypothetical situation. Otherwise, please provide the data showing that this withdrawal occurred.

CONFIDENTIAL (yes or **no):**

RESPONSE 2-7:

The 11,500 MMcf of withdrawal did not occur as described; however, imbalance customers were in fact allowed to make those withdrawals without incurring penalties.

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REQUEST 2-8

Please refer to the proposed 2,500 MMcf limit, which caps “the amount of gas that balancing customers can in aggregate borrow from other storage customers to approximately 110% of the average daily demand estimated in the 2022 CGR.” (Chapter 1 (Rincon & Yen at pg. 12, lines 1-4).

a. Please provide any analysis SoCalGas relied upon to determine the 110% of average daily demand limit.

b. Please justify using 110% of average daily demand compared to 100% or 120% of average daily demand.

CONFIDENTIAL (yes or **no):**

RESPONSE 2-8a:

SoCal Gas looked at the cumulative customers imbalance posted on Envoy and determined that a limit of 2,500 MMcf, or approximately 110% of the expected average daily demand would likely result in a small number of OFOs.

RESPONSE 2-8b:

Based on the prior response, SoCal Gas determined that a 100% limit would result in a greater number of OFOs, while a 120% limit would not be binding.

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REQUEST 2-9

Please refer to Chapter 8 (Seres) at pg. 15, lines 10-12: “A considerable number of larger customers are served directly off the backbone transmission system without using local transmission lines. In other words facilities that are identified as backbone serve a local transmission function as well.”

CONFIDENTIAL (yes or **no):**

a. Please confirm that all of the “larger customers” referenced above take service under Schedule GT-TLS or else confirm which rate schedule these customers take service under.

RESPONSE 2-9a.

Yes. The customers are either on SoCalGas or San Diego Gas & Electric Schedule GT-TLS.

b. Are any of these “larger customers” wholesale customers? If so, how many?

RESPONSE 2-9b.

No.

c. How many of these “larger customers” fit into each of the following categories:

- i. Commercial/Industrial
- ii. Enhanced Oil Recovery
- iii. Electric Generation

RESPONSE 2-9 ci, cii, ciii.

- i. Commercial/Industrial - 0
- ii. Enhanced Oil Recovery - 0
- iii. Electric Generation - 16