

**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 15 FROM SOUTHERN CALIFORNIA GENERATION  
COALITION DATED MAY 22, 2023)**

**SOCALGAS RESPONSE DATED: JUNE 5, 2023**

**QUESTION 15.1**

15.1. Regarding the response to Question 8.2 which provides the monthly volumes of gas falling under the G-IMB tariff, Buy Back Rate.

15.1.1. Who pays for and takes ownership of the volumes of gas purchased from the imbalance customer(s) under the Buy Back Rate; is this the Gas Acquisition Department?

**RESPONSE 15.1.1.**

Yes, it is for noncore and CTA G-IMB imbalance charges. SoCalGas takes title to customer imbalance gas subject to the monthly cash out provisions of Schedule No. G-IMB. Credit entries for revenues associated with noncore standby and buyback services under Schedule No. G-IMB are made to the Purchased Gas Account (PGA) described in the SoCalGas Preliminary Statement. The purpose of this account is to balance the recorded cost of gas for the Single Gas Portfolio to provide procurement service for both SoCalGas and SDG&E customers with the corresponding revenue from the sale of that gas. The PGA is administered by the Gas Accounting group in the Utility Gas Procurement Department.

Any gas purchased under the Buy Back Rate of imbalances created by the Utility Gas Procurement Department are sold by the System Operator. Credit entries for 100% of the net revenues associated with the System Operator providing transportation balancing services under Schedule No. G-IMB to the Utility Gas Procurement Department are made to the Noncore Fixed Cost Account (NFCA).

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15.1.2. Where are the Buy Back volumes stored?

**RESPONSE 15.1.2.**

All G-IMB cash out gas is allocated to and from the PGA.

15.1.3. Are Buy Back volumes used to offset the cumulative daily imbalance figures?

**RESPONSE 15.1.3.**

Yes.

15.1.4. If the answer to Q.15.1.4 is “yes,” please describe in detail how this once a month phenomenon is reflected in an ongoing daily figure, e.g., is the total Buy Back volume for the preceding month reflected in the cumulative daily imbalance figure on a specific day during the following month?

**RESPONSE 15.1.4.**

The Noncore Billing System begins sending Envoy monthly imbalance positions on the last business day before the monthly trading window opens. The system continues to send updates until the last day of trading. Updates are only sent if there is a change from the original position. The Cumulative Customer Imbalance (CCI) is adjusted based on these updates.

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15.1.5. If the answer to Q.15.1.4 is “no,” please explain why the Buy Back volumes would continue to be considered to be part of the imbalance volumes after they have been effectively “cashed out.”

**RESPONSE 15.1.5.**

See Response 15.1.4.

15.1.6. Who provides the gas provided to an imbalance customer under the G-IMB, Standby Procurement tariff; is this the Gas Acquisition Department?

**RESPONSE 15.1.6.**

Standby Procurement gas sold to a customer is allocated from the PGA.

15.1.7. Who receives the monies paid by the imbalance customer buying gas under the Standby Procurement tariff; is this the Gas Acquisition Department?

**RESPONSE 15.1.17.**

See Response 15.1.1.

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15.1.8. Are Standby Procurement volumes used to offset the cumulative daily imbalance figures?

**RESPONSE 15.1.8.**

See Response 15.1.4.

15.1.9. If the answer to Q.15.1.4 is “yes,” please describe in detail how this once a month phenomenon is reflected in an ongoing daily figure, e.g., is the total Standby Procurement volume for the preceding month reflected in the cumulative daily imbalance figure on a specific day during the following month?

**RESPONSE 15.1.9.**

Please see Response 15.1.4.

15.1.10. If the answer to Q.15.1.4 is “no,” please explain why the Standby Procurement volumes would continue to be considered to be part of the imbalance volumes after they have been effectively “cashed out.”

**RESPONSE 15.1.10.**

Please see Response 15.1.4.