

**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 SHELL ENERGY DATED MAY 24, 2023**

**SOCALGAS RESPONSE DATED: JUNE 8, 2023**

**Question 1:**

Referencing Chapter 11 (Borkovich) and SoCalGas' proposal to offer a new rate option, G-BTS5:

- a. Please explain what scheduling priority the new G-BTS5 rate will have relative to other BTS rates.

**Response 1a:**

G-BTS5 contracts will have the same priority as G-BTS1 and G-BTS2 contracts.

- b. In the event that G-BTS5 is approved after commencement of the open season in 2023, please confirm or deny whether shippers have the option to convert from a BTS1 or BTS2 rate to the new G-BTS5 rate. If denied, please explain why not. If confirmed, please provide any limiting circumstances or applicable processes for a shipper to take this option.

**Response 1b:**

Converting existing G-BTS1 and G-BTS2 contracts to the G-BTS5 rate during the October 1, 2023-26 term was not proposed in Chapter 11 Prepared Direct Testimony of Paul Borkovich.

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**Question 2:**

Referencing SoCalGas' existing Rule 30, please confirm that the Confirmation Order set forth in Rule 30, Section D.3 has allowed scheduled interruptible to flow before firm in Cycle 5, since scheduled interruptible cannot be bumped below elapsed pro rata scheduled quantity (EPSQ) in Cycle 5, resulting in system capacity limitation (CCR-C Allocations) cutting new firm before scheduled interruptible.

**Response 2:**

Yes. Cycle 4 interruptible elapsed pro rata scheduled quantities have priority over new firm BTS nominations in Cycle 5. The lower priority nominations are cut prior to higher priority nominations when total BTS nominations exceed system capacity.

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**Question 3:**

Referring to the May 2023 Customer Forum, please explain in detail why CCR-C allocations are only on Cycle 5 on Non-OFO days but on High OFO Days, CCR-C allocations occur on Cycles 3, 4, and 5.

**Response 3:**

On July 28, 2010, SoCalGas filed Advice No. 4139 to, among other things, revise the allocation of receipt point capacity during the Intraday 1 cycle (Cycle 3) due to a system capacity limitation during an OFO event. The requested allocation process for management of over nominations on High OFO days was developed in settlement discussions with all of the parties to the Firm Access Rights (FAR) Update Proceeding (A.10-03-028) concerning OFO events. SoCalGas and the FAR Update parties were able to achieve consensus on the changes concerning OFO events requested to Rule Nos. 30 and 41. The Commission approved Advice No. 4139 effective September 1, 2010.

On July 10, 2015, SoCalGas filed Advice No. 4835 to revise Rule 30 to clarify how BTS nominations are confirmed during the last BTS scheduling cycle when total nominations exceed system capacity for both OFO and non-OFO days. This clarification was explained in the 2015 Customer Forum Annual Report and reviewed with customers in the subsequent 2015 Customer Forum meeting.

The System Operator is required to manage the system in a safe and reliable manner. Cutting nominations during the last pipeline scheduling cycle (currently Intraday 3 or Cycle 5) on any day when the system is over nominated (CCR-C allocations) prevents system over pressurization. This process was formalized in SoCalGas Tariff Rule 30 by Commission approval of Advice No. 4835.

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**Question 4:**

Please provide illustrative rates for all BTS schedules, including SoCalGas' proposed G-BTS5 rate, for calendar years 2024-2026. For proposed G-BTS5, please provide illustrative rates based on a range of volume proxy values.

**Response 4:**

Listed below are the BTS rates for calendar year 2024 to 2026 from [Chapter 13 Prepared Direct Testimony of Iftekharul \(Sharim\) Chaudhury](#) at Tables 1 and 3:

Type	Units	TCAP			
		<u>1/1/2024</u>	<u>TCAP 1/1/2025</u>	<u>TCAP 1/1/2026</u>	<u>TCAP 1/1/2027</u>
BTS	\$/dth/day	0.50099	0.50268	0.51054	0.51988

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**Question 5:**

Please serve Shell Energy with all data responses served by SoCalGas and/or SDG&E at the time they are served on other parties to this proceeding. Please note that this request, as with the others, is continuing in nature.

**Response 5:**

Data responses relative to A.22-09-015 can be found at [A.22-09-015 - SoCalGas and SDG&E 2024 Cost Allocation Proceeding | SoCalGas](#) and at [SoCalGas and SDG&E 2024 Cost Allocation Proceeding \(TCAP\) | San Diego Gas & Electric \(sdge.com\)](#).