

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

**Question 1**

1. Weather Design Chapter 2:

- a) Please re-run all your calculations, equations and models including recorded 2022 actual data with the most recent 20 years (2002-2022).

**Response a)**

SoCalGas objects to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the Weather Design in SoCalGas' testimony does not include recorded data for 2022 and SoCalGas further objects that undergoing such a study at this time is unduly burdensome.

- b) Please re-run all your calculations, equations and models including recorded 2022 actual weather data with the most recent 10 years (2012-2022) for average year and cold year.

**Response b)**

See Response 1a.

- c) Provide all supporting documentation, including workpapers in Microsoft Excel format that include all formulas, calculations, active cells, and links for questions a) and b).

**Response c)**

See Response 1a.

- d) Please provide the results for questions a) and b) in the same format as the Tables within Chapter 2 Testimony.

**Response d)**

See Response 1a.

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

**Question 2**

2. Residential, Core Markets (including NGV), The Gas Price Forecast, and The Core Brokerage Fee, Chapter 3:

a) Please re-run the End-Use Model and update the Model with recorded 2022 data for all the variables that are applicable.

i. Use the most recent 10 years of data (2012-2022) for all applicable variables and re-run the Model.

**Response a)i.**

SoCalGas objects to this request on the ground that it is beyond the scope of the witness's testimony inasmuch as the End-Use Model in SoCalGas' testimony does not include recorded data for 2022 and SoCalGas further objects that undergoing such a study at this time is unduly burdensome.

ii. Please include the results from question 1 to re-run your calculations and Model.

**Response a)ii.**

See Response 1a)i.

iii. Is the End-Use Model updated with the most recent data for all their variables?

**Response a)iii.**

See Response 1a)i.

iv. Provide the results in the same format as the Tables included in Chapter 3.

**Response a)iv.**

See Response 1a)i.

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

- b) Please provide recorded 2022 customer count actual data same format as in SDG&E workpapers page 4 for SDG&E Gas Meter Forecast.

**Response 2b).**

See Excel file, Cal\_Advocates-001\_Q2b.xlsx

- c) Please provide recorded 2022 customer count actual data same format as in workpapers page 79 for SCG connected meter forecast and SCG active meter forecast.

**Response 2c).**

See Excel file, Cal\_Advocates-001\_Q2c.xlsx

- d) Table 6, workpapers page 426, please explain the rationale for forcing peak day usage for the purpose of revenue allocation to be restricted to December, when the peak day over the past 10, 20, and 30 years is more often not in December.

**Response 2d).**

SDG&E objects on the ground the question is vague and ambiguous inasmuch as this question does not specify which workpaper it refers to. Subject to and without waiving the foregoing, SDG&E respond as follows: SDG&E answers this question based on the question refers to table 6 page 426 of Chapter-3-SDGE workpapers.

As stated in footnote 15 in page 7 of Chapter 2, "The temperature SDG&E uses to define a peak day is determined from an analysis of the annual minima of SDG&E's daily system-average temperatures in order to estimate a probability model for the annual minimum daily temperature." Annual peak temperature does not always happen in December, as shown in table 6 page 426 of Chapter-3-SDGE workpapers.

- i. Please provide alternative modeling, allowing peak day forecast to capture actual peak day over the past 10 years.

**Response 2d)i.**

SoCalGas and SDG&E object to this request on the ground that the term "alternative modeling" method is vague and ambiguous. SoCalGas and SDG&E further object on the ground that this request seeks information that is beyond the scope of the witness's testimony inasmuch as the witness did not propose this method and have not discussed this "alternative modeling" in this proceeding.

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

- ii. Please explain the difficulties in acknowledging actual peak day for the purposes of allocation revenue between classes.

**Response 2d)ii.**

SoCalGas and SDG&E object to this request on the ground that the term “acknowledging actual peak day” method is vague and ambiguous. SoCalGas and SDG&E further object on the ground that this request seeks information that is beyond the scope of the witness’s testimony inasmuch as the witness did not propose this method and have not discussed this method in this proceeding.

**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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 3**

3. Are SDG&E and SCG using Employment Elasticities that are 14 or more years old? If so, please clarify the exact age of the employment elasticities used by SDG&E and SCG.

**Response 3**

Yes. It is 20 years old.

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

**Question 4**

4. Please explain in detail when the last time was that SDG&E and SCG updated their Employment Elasticity used in their model.
  - a) If SCG and SDG&E have not updated their Employment Elasticity model, please explain why SDG&E and SCG's forecasting group has not generated more up to date Employment Elasticities.

**Response 4a).**

See Response 3. The employment elasticities by market segment were estimated in 2003 in preparation for the 2005 Cost Allocation Proceeding. Estimating the elasticities by market segment requires robust data in very granular level of detail and some of the data is not readily available.

**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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 5**

5. Are SDG&E and SCG using Price Elasticities that are 14 or more years old? If so, please clarify the exact age of the price elasticities used by SDG&E and SCG.

**Response 5**

Yes. It is 20 years old.

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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023

SOCALGAS RESPONSE DATED: MAY 25, 2023

**Question 6**

6. Please explain in detail when SDG&E and SCG last updated their Price Elasticity used in their models.

- a) If SCG and SDG&E have not updated their price elasticity models, please explain why SDG&E and SCG's forecasting group has not generated more up to date Price Elasticities.

**Response 6a).**

See Response 5. The SoCalGas and SDG&E price elasticities by market segment were estimated in 2003 in preparation for the 2005 Cost Allocation Proceeding. The empirical work is very labor intensive. Estimating the elasticities for each of the corresponding segmentation groups in the model requires robust data in very granular level of detail and some of the data is not readily available.

**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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 7**

7. Please provide any currently available study/studies that validate the Core Employment and Price Elasticities.

**Response 7**

The baseline price-based elasticity estimates are well within the range of estimates from existing literature.

RAND (2005) states that their empirical research has determined that in a 20-year study, the price elasticity of demand for gas has remained fairly constant.



AGA paper on Elasticities\_ Joutz Fred



Rand paper on Elasticities 2005.pdf



Maximilian



Jessee



Dave Costello Paper Elasticities 2006.pc



Bohi Douglas 1981 Publication.pdf



\_Introduction to Elasticities for ARB\_Re

**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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 8**

8. Noncore and Consolidated Demand Forecast, chapter 5:

a) Please update the conversion of Dth to Mcf for 2022 for SCG and SDG&E.

**Response 8a).**

SoCalGas and SDG&E object on the ground that the request seeks information that is unduly burdensome to prepare. SoCalGas and SDG&E note that they used a conversion factor based on published California Gas Report (CGR) 2022 in this proceeding.

b) Please update the 36-month most recent recorded Receipts and Deliveries including 2022 recorded data. Provide updated values as illustrated in Table 2 of workpapers page 148 for SCG and SDG&E page 156.

**Response 8b).**

See Excel file, CalAdvocate-001\_Q8b.

**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 DR PAO-SCG & SDG&E-001-MPS FROM CAL ADVOCATES  
DATED MAY 11, 2023**

**SOCALGAS RESPONSE DATED: MAY 25, 2023**

**Question 9**

9. If SCG and SDG&E are not able to provide the requested information to all the questions above, state the reason(s) in the response.

**Response 9.**

See responses provided above.