

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER
VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN
CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE
DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CAUSE-SCG-06)**

Date Requested: February 15, 2024, Submitted: March 1, 2024

QUESTION 1: Pages 30-31 of the CPCN Application states that “SoCalGas reduced the injection capacity of the La Goleta Storage Field by 50 MMcfd and posted this reduction to its electric bulletin board, ENVOY. This reduction in capacity took place in March 2013, and the limitation is still in effect.” Page 32 of the CPCN Application notes “an additional 20 MMcfd reduction in La Goleta Storage Field injection capacity since 2017 (in addition to the 50 MMcfd reduction in 2013 noted above for a total existing reduction of 70 MMcfd).”

- a. Would increasing storage injection capacity at the La Goleta Storage Field by 70 MMcfd from current levels to address the “total existing reduction of 70 MMcfd” result in an increase in operational costs or capital investments in the La Goleta Storage Field? If yes, please identify the increased operational costs or capital investments.

RESPONSE 1:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas additionally objects to this request on the grounds the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Please refer to Response 9 of CAUSE DR2.

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QUESTION 2: SoCalGas response to Data Request CAUSE-SCG-05, Q.1 provides actual customer demand on the North Coastal System for the past 10 years up to September 2023. Please provide an update to this response that provides actual customer demand on the North Coastal System for all of 2023.

RESPONSE 2:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 et seq.; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

In order to determine whether information was sufficiently aggregated to comply with applicable confidentiality laws, a 15/15 Rule analysis was applied. The 15/15 Rule comes from the Public Utilities Commission’s decisions setting forth a mechanism for assessing whether customer usage data is sufficiently aggregated to protect customer confidentiality. The 15/15 Rule generally provides that aggregated or anonymized customers’ specific information must be made up of at least 15 customers and a single customer’s load must be less than 15% of an assigned category. If the number of customers in the compiled data is less than 15, or if a single customer’s load is more than 15% of the total data, the 15/15 Rule provides for combining categories or removing non-conforming customer information before the information is released, or otherwise protecting the customer information from public disclosure. Accordingly, the noncore customer classes (noncore C&I, enhanced oil recovery (EOR) and electric generation (EG)) actual customer demand data is aggregated.

	Residential	Core C&I	Noncore	Total
2023 Total	9,414,544	5,850,788	4,899,675	20,165,007

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QUESTION 3: SoCalGas response to Data Request CAUSE-SCG-05, Q.3 provides average winter daily demand in MMcfd on the North Coastal System from 2014 to September 2023. Please provide an update to this response that provides average winter daily demand in MMcfd for all of 2023.

RESPONSE 3:

SoCalGas objects to this request on the grounds it is compound and argumentative. SoCalGas additionally objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Average Winter Daily Mmcf	
YEAR	TT_Mmcf
2023	70.06

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QUESTION 4: SoCalGas response to Data Request CAUSE-SCG-03, Q.7 provides annual maximum and minimum inventory levels in bcf for the La Goleta Storage Field from 2015 through November 1, 2023. Please provide an update to this response that provides the annual maximum and minimum inventory level for the La Goleta Storage Field in bcf for all of 2023.

RESPONSE 4:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The requested data is available on SoCalGas' Electronic Bulletin Board ENVOY Homepage at <https://www.socalgasenvoy.com/>. Once the Homepage is accessed hover your cursor over the Storage Inventory graph to determine the daily inventory for each storage field including Goleta for any day between July 1, 2021, and after.

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QUESTION 5: Page 33 of the CPCN Application states that “The current compressor station configuration cannot compress and flow the 160 MMcfd of gas that is currently needed for reliable system operation in the summer operating season, not the 120 MMcfd of gas that is required to be flowed in the winter operating season.” Response to Data Request CAUSE-SCG-05, Q.3 identifies average daily winter demand between 2014 and 2023 as ranging from 68.20 to 80.88 MMcfd.

- a. Please explain why “120 MMcfd of gas is required to be flowed in the winter operating season.” Please include an explanation of why 120 MMcfd is required when average winter daily demand has not exceeded 80.88 MMcfd between 2014 and 2023.

RESPONSE 5:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. As described in the Application, Section III. A. 3. SoCalGas’s Obligation to Provide Reliable Service on pages 21 through 23, the CPUC has mandated that SoCalGas design its system to serve demand on peak days, which are by definition greater than average.

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QUESTION 6: Page 2-8 of the PEA states that “The average daily summer demand used in the design of the Project is 60 MMcfd.”

- a. What is the average daily winter demand used in the design of the Project?

RESPONSE 6:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas did not use an average daily winter demand to design the Project.

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QUESTION 7: Page 2-8 of the PEA states that “The average daily flow *requirement* to fill the La Goleta Storage Field from 0 to 21.5 Bcf in the 214-day summer season is another 100 MMcfd on top of the forecasted average daily demand.”

- a. Does “requirement” as used in this sentence refer to a regulatory requirement? If so, please provide the applicable regulation. If not, please explain the requirement referenced in this sentence.

RESPONSE 7:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Please refer to Response 5 to this data request. As further described in that section of the Application, storage is an integral part to meeting the requirements of that mandate.

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QUESTION 8: SoCalGas response to Data Request CEJA-SEU-01 (July 28, 2022) in A.22-05-015 states in part “Historically, each compressor has run an average of 4,000 hours per year, however, operational needs now and in the future dictate the frequency with which the compressors operate. Operating hours are only indicative of the amount of time a unit is operating but do not indicate overall system demand requirements.” Please explain why operating hours do not indicate overall system demand requirements.

RESPONSE 8:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The operating hours of the individual units at Ventura Compressor Station are only indicative of the time that each particular unit is operating. Operating hours can’t be directly correlated with system demand conditions. In addition to system demand, operating hours are impacted by compressor unit availability, availability of pipelines, storage inventory/availability, and system wide operating conditions.

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QUESTION 9: The CPCN Application at 4 states that for the existing compressors at the Ventura Compressor Station “a 25% capacity reduction was taken in 2017 (to compensate for operational changes to maintain a minimum engine torque) to support consistent operating performance.” The PEA at 2-8 states that “the existing Ventura Compressor Station only has an average throughput capacity of 90 MMcfd.”

- a. Does the 90 MMcfd average throughput capacity of the existing Ventura Compressor Station referenced at page 2-8 of the PEA account for the 25 percent capacity reduction in 2017? If yes, please explain how this was accounted for.
- b. Does the 90 MMcfd average throughput capacity of the existing Ventura Compressor Station referenced at page 2-8 of the PEA account for maintenance events referenced on page 43 of the CPCN? If yes, please explain how this was accounted for.

RESPONSE 9:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. No. 90 MMcfd is the published design capacity for the station.
- b. No. 90 MMcfd is the published design capacity for the station.

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QUESTION 10: What is the average throughput capacity of the 3,250 HP electric compressor at Sylmar.
(Horsepower of this compressor is referenced in Data Request CEJA-SEU-001, Q.7 in A.22-05-015.)

RESPONSE 10:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The design throughput capacity of the Sylmar Compressor Station is 43 million standard cubic feet per day.

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QUESTION 11: 49 CFR 192.903 outlines a number of key definitions pertaining to the calculation of potential impact circles, or the distance within which the potential failure of gas infrastructure could have significant impact on people or property.

- a. Please provide the size and location of any High Consequence Areas related to the Proposed Project.
- b. Please provide the potential impact circle of the Proposed Project.
- c. Please provide the method and inputs used to calculate the potential impact circle.
- d. Please provide the numerical Class classifications of locations near the Proposed Project, as defined by 49 CFR 192.5.
- e. Please list any identified sites within the potential impact circle.
- f. If any of the previous information has not been identified, please explain why.

RESPONSE 11:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

49 CFR 192.903 provides guidance on identifying and assessing risks as part of the integrity management program of gas transmission pipelines and is not intended for the design of new compressor stations. Risk analysis for design of new compressor stations is performed during the design phase in the form of a HAZOP (Hazard and Operability Analysis) or PHA (Process Hazard Analysis). The DOT transmission pipelines within the fence line of the compressor station will not change as a result of the Proposed Project.

- a. Not applicable since the Proposed Project is a compressor station.
- b. Not applicable since the Proposed Project is a compressor station.
- c. Not applicable since the Proposed Project is a compressor station.
- d. Not applicable since the Proposed Project is a compressor station.

Confidential and Protected Materials provided pursuant to the Non-Disclosure Agreement between SoCalGas and Central Coast Alliance for a Sustainable Economy (CAUSE).

Class location of the DOT Transmission pipelines at the Ventura Compressor Station is [REDACTED]

- e. Not applicable since the Proposed Project is a compressor station.
- f. Not applicable since the Proposed Project is a compressor station.

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QUESTION 12: The PEA at 5.8-1 provides compressor leak and venting data “based on CARB’s Oil and Gas reports.” The PEA states on this basis that there were “24 leaks from components in fugitive service in 2021 and 17 in 2022.” The PEA also provides venting and leak totals of 398 thousand Mscf in 2021 and 803 Mscf in 2022, and that leaks were 12% and 9% of these totals for 2021 and 2022 respectively. The remaining percentages in this reporting category are attributed to “compressor-vented emissions.”

- a. Does SoCalGas have additional leak and venting data that is not included in CARB’s Oil and Gas reports? If so, please provide this data.
- b. Please define “components in fugitive service.”
- c. Do the leaks identified in the PEA (24 and 17) account for all of the emissions attributed to leaks for 2021 and 2022 in the Oil and Gas report? If not, please explain why the additional leaks are not counted, and how they are measured.

RESPONSE 12:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Yes. Available at www.socalgas.com/regulatory/R1501008 S.
- b. Fugitive service is defined by CARB Oil and Gas Regulation Section 95667 a(9). Available at: [Oil and Gas Final Regulation Order \(ca.gov\)](#)
- c. Yes.

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QUESTION 13: The PEA at 5.8-1 states that 88% of emissions in 2021 and 91% of emissions in 2022 reported in CARB's Oil and Gas report are from venting. SoCalGas response to Data Request CAUSE-SCG-02, Q.13 states that no blowdowns "are known to have occurred since July 2021."

- a. Does SoCalGas distinguish between methane emissions that are vented and methane emissions that are released in a blowdown event? If yes, please explain how SoCalGas differentiates between vented emissions and emissions from a blowdown event?
- b. Besides planned and unplanned blowdowns, what ways does SoCalGas use to vent gas from the compressor station?
- c. Is the gas released in planned and unplanned blowdowns included in compressor-vented emission in the Oil and Gas report? If not, please explain why.

RESPONSE 13:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Yes. The definitions are provided in the SB1371 appendices at:
www.socalgas.com/regulatory/R1501008
- b. The SB1371 appendices detail all the ways that SoCalGas vents gas from the compressor station.
- c. No. The CARB Oil and Gas Report does not require reporting of blowdowns from compressors. The SB1371 report is the comprehensive report of all methane emissions from the compressor station.
www.socalgas.com/regulatory/R1501008

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QUESTION 14: SoCalGas response to Data Request CAUSE-SCG-02, Q.13 states that no blowdowns “are known to have occurred since July 2021.”

- a. Please describe SoCalGas’ monitoring and record keeping process for blowdown events. In your response, please describe any changes to SoCalGas’ monitoring or record keeping process that has occurred from 2017 to the present.
- b. When are blowdowns identified and recorded by SoCalGas following their occurrence?
- c. What are the circumstances under which a blowdown event would not be “known” by SoCalGas?
- d. Have there been any operational changes by SoCalGas that would reduce the likelihood of blowdowns at the Ventura Compressor Station since July 2021?
- e. Have there been any changes in the North Coastal System that would reduce the likelihood of blowdowns at the Ventura Compressor Station since 2021?
- f. Does the increase in venting from 2021 to 2022, as provided at PEA 5.8-1, reduce the need for blowdowns?

RESPONSE 14:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See CAUSE-SCG-01 Question 1a response.
- b. Blowdowns are reported consistent with forms 7011, 3466, and GS 223.0155 (provided in CAUSE-SCG-01, Q1 attachments).
- c. None. Blowdowns events are planned events and are documented. For blowdown events, documentation is completed and submitted to reporting groups within SoCalGas within 60 days of the event.
- d. No operational changes have taken place since July 2021. The proactive maintenance of the units has contributed to the reduction in unit blowdowns.
- e. No changes to the Northern Coastal System since 2021.
- f. No. Blowdowns are completed, if necessary, for operational or maintenance requirements.