**SOUTHERN CALIFORNIA GAS COMPANY**
**SAN DIEGO GAS & ELECTRIC COMPANY**
**ORDER INSTITUTING RULEMAKING TO ESTABLISH POLICIES, PROCESSES AND**
**RULES TO ENSURE SAFE AND RELIABLE GAS SYSTEMS IN CALIFORNIA AND PERFORM LONG-TERM GAS SYSTEM PLANNING**
**(R.20-01-007)**
**(6th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**
**DATA RECEIVED: 8-17-20**
**DATE RESPONDED: 9-3-20**

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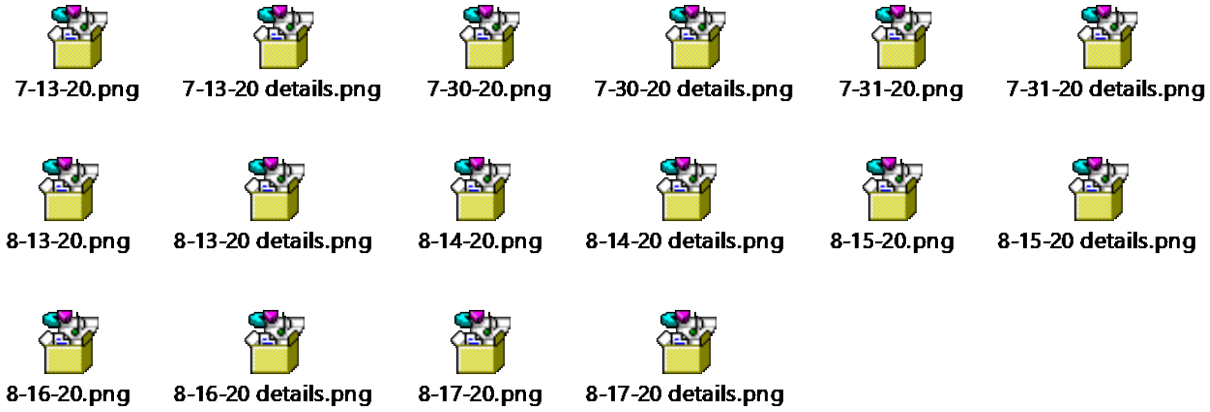
## QUESTION 6.1.1

6.1. Please see the following screen prints from Envoy's Low OFO Calculation screen including the Activity Log and the Details to the calculation for the dates: July 13, 2020, July 30, 2020, July 31, 2020, August 13, 2020, August 14, 2020, August 15, 2020, August 16, 2020 and August 17, 2020.




6.1.1. Please confirm that Condition 1 of the Aliso Canyon Protocol was met for each of these dates.

## RESPONSE 6.1.1

Confirmed.

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**QUESTION 6.1.2**

6.1.2. Please confirm that per D.20-02-045, pp. 13-14, the amount of storage capacity available for load balancing services during the summer months is 840 MMcf/d when Aliso Canyon is available and 350 MMcf/d when Aliso Canyon is not available.

**RESPONSE 6.1.2**

SoCalGas confirms that, per D.20-02-045:

- Summer load balancing withdrawal is 840 MMcf/d when Aliso Canyon is available (Table 1 pg. 13); and
- Summer load balancing withdrawal is 350 MMcf/d when Aliso Canyon is not available (Table 2 pg. 14).

However, Ordering Paragraph 5 of D.20-02-045 additionally states that daily available capacities are to be prorated. The storage capacities available for load balancing are summarized in this SoCalGas ENVOY® Critical Notice which was compiled based on D.20-02-045:

https://scgenvoy.sempra.com/ebb/attachments/1588209243468_Notice_of_May_1_2020_Balancing_Capacity_Changes.pdf

Please see the following SoCalGas ENVOY® Critical Notice dated September 3, 2020, providing additional information regarding an upcoming change to the way these prorations are calculated:

https://scgenvoy.sempra.com/ebb/attachments/1599144851129_September_2020_Balancing_Capacity_Changes.pdf

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**QUESTION 6.1.3**

6.1.3. On July 13, the storage withdrawal limit for balancing was 366,130 for the Evening cycle but was increased to 1,147,908 for Intraday 1 cycle.

6.1.3.1. Please explain in detail why the storage withdrawal limit was increased between the Evening and Intraday 1 cycles.

6.1.3.2. Please explain in detail why the storage withdrawal limit was increased to 1,147,908 for the Intraday 1 and Intraday 2 cycles.

6.1.3.3. Please explain in detail why the storage withdrawal limit was increased further to 1,158,108 for the Intraday 3 cycle.

6.1.3.4. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.3.5. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.3.1**

Please see the attached Excel file “SCGC-06 R.20-01-007.”

SCGC-06
R.20-01-007

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Because a condition for the Aliso Canyon Withdrawal Protocol (ACWP) was met for Intraday 1 cycle, the Withdrawal Capacity was increased as Aliso Canyon capacity was made available for nominations and balancing. The percent allocated to the balancing function also increased from 47% to 68% because the ACWP was met.

Storage withdrawal limit for balancing =
(Withdrawal Capacity) * (% Allocated to the Balancing Function)
Evening Storage withdrawal limit for balancing =
(779,000) * (0.47) = 366,130
Intraday 1 Storage withdrawal limit for balancing =
(1,688,100) * (0.68) = 1,147,908

**RESPONSE 6.1.3.2**

See Response 6.1.3.1.

**RESPONSE 6.1.3.3**

Due to BTU fluctuation.

**RESPONSE 6.1.3.4**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but since the System Operator declared an OFO on Cycle 2 based on higher than maximum authorized capacities, then an OFO would have been declared even if the limits were in place. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.3.5**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.4**

6.1.4. On July 30, the storage withdrawal limit for balancing was 380,700 for the Evening cycle but was increased to 1,119,581 for Intraday 1 cycle.

6.1.4.1. Please explain in detail why the storage withdrawal limit was increased between the Evening and Intraday 1 cycles.

6.1.4.2. Please explain in detail why the storage withdrawal limit was increased to 1,119,581 for the Intraday 1 cycle.

6.1.4.3. Please explain in detail why the storage withdrawal limit was increased further to 1,185,920 for the Intraday 2 cycle.

6.1.4.4. Please explain why the storage withdrawal limit was decrease to 819,680 for the Intraday 3 cycle.

6.1.4.5. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Intraday 1 and Intraday 2 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.4.6. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing by D.20-02-045 during the Intraday 1 and Intraday 2 cycles.

**RESPONSE 6.1.4.1**

See Excel file included in Response 6.1.3.1.

Because a condition for the Aliso Canyon Withdrawal Protocol (ACWP) was met for Intraday 1 cycle, the Withdrawal Capacity was increased as Aliso Canyon capacity was made available for nominations and balancing. The percent allocated to the balancing function also increased from 47% to 68% because the ACWP was met.

Storage withdrawal limit for balancing =
(Withdrawal Capacity) * (% Allocated to the Balancing Function)
Evening Storage withdrawal limit for balancing =
(810,000) * (0.47) = 380,700
Intraday 1 Storage withdrawal limit for balancing =
(1,646,442) * (0.68) = 1,119,581

**RESPONSE 6.1.4.2**

See response 6.1.4.1

**RESPONSE 6.1.4.3**

Due to BTU fluctuation

**RESPONSE 6.1.4.4**

It was a user error. The corrected capacity is reflected in the Capacity Utilization Screen.

**RESPONSE 6.1.4.5**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.4.6**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.5**

6.1.5. On July 31, the storage withdrawal limit for balancing was 421,590 for the Timely cycle but was increased to 1,186,056 for the Evening and Intraday 1 cycles.

6.1.5.1. Please explain in detail why the storage withdrawal limit was increased between the Timely and Evening cycles.

6.1.5.2. Please explain in detail why the storage withdrawal limit was increased to 1,186,056 for the Timely and Evening cycles.

6.1.5.3. Please explain in detail why the storage withdrawal limit was increased further to 1,185,920 for the Intraday 2 and Intraday 3 cycles.

6.1.5.4. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.5.5. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.5.1**

See Excel file included in Response 6.1.3.1.

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Because a condition for the Aliso Canyon Withdrawal Protocol (ACWP) was met for Evening cycle, the Withdrawal Capacity was increased as Aliso Canyon capacity was made available for nominations and balancing. The percent allocated to the balancing function also increased from 47% to 68% because the ACWP was met.

Storage withdrawal limit for balancing = (Withdrawal Capacity) * (% Allocated to the Balancing Function)
Timely Storage withdrawal limit for balancing equals: (897,000) * (0.47) = 421,590
Evening Storage withdrawal limit for balancing equals: (1,744,200) * (0.68) = 1,186,056

**RESPONSE 6.1.5.2**

See Response 6.1.5.1.

**RESPONSE 6.1.5.3**

Due to BTU fluctuation. To clarify, this is a decrease, not an increase.

**RESPONSE 6.1.5.4**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Evening or Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.5.5**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.6**

6.1.6. On August 13, the storage withdrawal limit for balancing was 367,070 for the Evening cycle but was increased to 1,129,874 for Intraday 1 cycle.

6.1.6.1. Please explain in detail why the storage withdrawal limit was increased between the Evening and Intraday 1 cycles.

6.1.6.2. Please explain in detail why the storage withdrawal limit was increased to 1,129,874 for the Intraday 1 cycle.

6.1.6.3. Please explain in detail why the storage withdrawal limit was increased further to 1,130,160 for the Intraday 2 cycle and to 1,147,908 for the Intraday 3 cycle.

6.1.6.4. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.6.5. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.6.1**

See Excel file included in Response 6.1.3.1.

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Because a condition for the Aliso Canyon Withdrawal Protocol (ACWP) was met for Intraday 1 cycle, the Withdrawal Capacity was increased as Aliso Canyon capacity was made available for nominations and balancing. The percent allocated to the balancing function also increased from 47% to 68% because the ACWP was met.

Storage withdrawal limit for balancing =

(Withdrawal Capacity) * (% Allocated to the Balancing Function)

Evening Storage withdrawal limit for balancing =

(781,000) * (0.47) = 367,070

Intraday 1 Storage withdrawal limit for balancing =

(1,661,580) * (0.68) = 1,129,874

**RESPONSE 6.1.6.2**

See response 6.1.6.1

**RESPONSE 6.1.6.3**

Due to BTU fluctuation.

**RESPONSE 6.1.6.4**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.6.5**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.7**

6.1.7. On August 14, the storage withdrawal limit for balancing was 1,130,364 for the Timely cycle but was increased to 1,147,908 for Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

6.1.7.1. Please explain in detail why the storage withdrawal limit was established at 1,130,364 for the Timely cycle.

6.1.7.2. Please explain in detail why the storage withdrawal limit was increased between the Timely and Evening cycles.

6.1.7.3. Please explain in detail why the storage withdrawal limit was increased to 1,147,908 for the Evening, Intraday 1, Intraday 2 and Intraday 3 cycles.

6.1.7.4. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.7.5. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

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**RESPONSE 6.1.7.1**

See Excel file included in Response 6.1.3.1.

Because a condition for the Aliso Canyon Withdrawal Protocol was met on the Timely Cycle, Aliso Canyon capacity was made available for nominations and balancing, and the percent allocated to the balancing function was 68%.

Storage withdrawal limit for balancing =

(Withdrawal Capacity) * (% Allocated to the Balancing Function)

Timely Storage withdrawal limit for balancing =

(1,662,300) * (0.68) = 1,130,364

**RESPONSE 6.1.7.2**

Due to BTU fluctuation.

**RESPONSE 6.1.7.3**

Due to BTU fluctuation.

**RESPONSE 6.1.7.4**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Timely, Evening or Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.7.5**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.8**

6.1.8. On August 15, the storage withdrawal limit for balancing was 376,000 for the Timely cycle but was increased to 1,147,908 for all remaining cycles.

6.1.8.1. Please explain in detail why the storage withdrawal limit was increased between the Timely and Evening cycles.

6.1.8.2. Please explain in detail why the storage withdrawal limit was increased to 1,147,908 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

6.1.8.3. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.8.4. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.8.1**

See Excel file included in Response 6.1.3.1.

Because a condition for the Aliso Canyon Withdrawal Protocol (ACWP) was met for Evening cycle, the Withdrawal Capacity was increased as Aliso Canyon capacity was

made available for nominations and balancing. The percent allocated to the balancing function also increased from 47% to 68% because the ACWP was met.

Storage withdrawal limit for balancing = (Withdrawal Capacity) * (% Allocated to the Balancing Function)

Timely Storage withdrawal limit for balancing

= (800,000) * (0.47) = 376,000

Evening Storage withdrawal limit for balancing

= (1,688,100) * (0.68) = 1,147,908

**RESPONSE 6.1.8.2**

See response 6.1.8.1

**RESPONSE 6.1.8.3**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Evening or Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.8.4**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.9**

6.1.9. On August 16, the storage withdrawal limit for balancing was 1,147,840 for the Timely cycle but was increased to 1,154,640 for the Intraday 2 and Intraday 3 cycles.

6.1.9.1. Please explain in detail why the storage withdrawal limit was increased between the Intraday 1 and Intraday 2 cycles.

6.1.9.2. Please explain in detail why the storage withdrawal limit was increased to 1,154,640 for the Intraday 2 and Intraday 3 cycles.

6.1.9.3. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Timely, Evening Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.9.4. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.9.1**

Due to BTU Fluctuation.

**RESPONSE 6.1.9.2**

Due to BTU Fluctuation.

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**RESPONSE 6.1.9.3**

See Excel file included in Response 6.1.3.1 for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Timely, Evening or Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.9.4**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.

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**QUESTION 6.1.10**

6.1.10. On August 17, the storage withdrawal limit for balancing was 1,154,640 for the Timely, Evening, and Intraday 1 cycles but was increased to 1,156,680 for Intraday 2 cycle.

6.1.10.1. Please explain in detail why the storage withdrawal limit was increased between the Intraday 1 and Intraday 2 cycles.

6.1.10.2. Please explain in detail why the storage withdrawal limit was increased to 1,156,680 for the Intraday 1 and Intraday 2 cycles.

6.1.10.3. Please identify the level of storage withdrawal capacity authorized by D.20-02-045 for the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles and explain whether the System Operator would have had to declare a Stage 2 Low OFO or higher had the storage withdrawal limit during the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles been limited to the level of storage allocated to load balancing in D.20-02-045.

6.1.10.4. Please explain why the storage withdrawal limit was increased to a level that was in excess of the capacity allocated to load balancing during the Timely, Evening, Intraday 1, Intraday 2, and Intraday 3 cycles.

**RESPONSE 6.1.10.1**

Due to BTU Fluctuation.

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**RESPONSE 6.1.10.2**

Due to BTU Fluctuation.

**RESPONSE 6.1.10.3**

Please see spreadsheet for storage withdrawal capacities allocated to load balancing for each cycle in the gas day. The storage withdrawal capacities for balancing were not limited to those authorized in D. 20-02-045, but if the limits were in place, SoCalGas would not have declared an OFO for Timely, Evening or Intraday 1. Also, SoCalGas does not declare OFOs for Intraday 2 and Intraday 3 cycles.

**RESPONSE 6.1.10.4**

See SoCalGas ENVOY ® critical notice dated September 3, 2020, referenced in Response 6.1.2.