

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

Question 11.1.

11.1. With respect to SoCalGas workpaper Ch 8 Seres Embedded Costs.xlsx at the tab labeled “2021 SoCalGas Rate Base,” cell D22: please explain where in the 2020 TCAP decision the Commission directed SoCalGas to set Customer Advances for Construction to zero by providing the citation to the decision and relevant page, a quotation of the relevant language, and an explanation of why SoCalGas believes that the language directs this action.

Response 11.1.

In Decision 20-02-045:

- Conclusion of Law 9 at page 98:
9. Customer Advances for Construction (CAC) amounts should be assigned to distribution despite the change being immaterial in this proceeding.

- Ordering Paragraph 4 at pages 102-103:
4. San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) are authorized to allocate transmission and storage costs in the following manner:
e) ... and assign Customer Advances for Construction amounts to distribution.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

Question 11.2.

11.2. With respect to workpaper to Table 21, which is pasted below for reference:

Table 21 Reference (Reallocation)

		EG 1-in-10 peak day demand and Data from 2020 CGR page 144-146							
		2024		2025		2026		2027	
		SoCalGas and SDG&E		SoCalGas and SDG&E		SoCalGas and SDG&E		SoCalGas and SDG&E	
EG Demand Served Directly from Backbone -->	A	Percent Total	27.8%	Percent Total	35.0%	Percent Total	29.4%	Percent Total	25.0%
	B	Cold-Year Annual Average Demand (MMcfd)	2,480	Cold-Year Annual Average Demand (MMcfd)	2,474	Cold-Year Annual Average Demand (MMcfd)	2,457	Cold-Year Annual Average Demand (MMcfd)	2,307
A x B -->	C	Direct from Backbone (MMcfd)	691	Direct from Backbone (MMcfd)	866	Direct from Backbone (MMcfd)	722	Direct from Backbone (MMcfd)	569
Envoys Total Backbone Receipt Capacity -->	D	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435
C / D -->		% of Backbone w/Local Transmission Function	20.1%	% of Backbone w/Local Transmission Function	25.2%	% of Backbone w/Local Transmission Function	21.0%	% of Backbone w/Local Transmission Function	17.4%

		Daily EG Cold Year Demand Forecast for the Year and Data from 2020 CGR page 144-146									
		2024		2025		2026		2027		Average	
		SoCalGas and SDG&E		SoCalGas and SDG&E		SoCalGas and SDG&E		SoCalGas and SDG&E		Average	
EG Demand Served Directly from Backbone -->	A	Percent Total	22.5%	Percent Total	22.3%	Percent Total	22.3%	Percent Total	21.9%	average	22.3%
	B	Cold-Year Annual Average Demand (MMcfd)	2,480	Cold-Year Annual Average Demand (MMcfd)	2,474	Cold-Year Annual Average Demand (MMcfd)	2,457	Cold-Year Annual Average Demand (MMcfd)	2,307	average	2,452
A x B -->	C	Direct from Backbone (MMcfd)	558	Direct from Backbone (MMcfd)	552	Direct from Backbone (MMcfd)	548	Direct from Backbone (MMcfd)	525	average	546
Envoys Total Backbone Receipt Capacity -->	D	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435	Total Receipt Capacity (MMcfd)	3,435	average	3,435
C / D -->		% of Backbone w/Local Transmission Function	16.2%	% of Backbone w/Local Transmission Function	16.1%	% of Backbone w/Local Transmission Function	16.0%	% of Backbone w/Local Transmission Function	15.3%	average	16%

11.2.1. Referring to 2024 in the workpaper to Table 21, please confirm that the amount, 2,480 MMcf/d, shown as cold-year average demand in line B is taken from Table 35, page 146, line 28, of the 2020 CGR and that the figure corresponds to the total system throughput, not just the supply taken by the electric generators, which amounts to 654 (line 21) plus 106 (line 25). An excerpt from Table 35 is reproduced for convenience below:

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)

SOCALGAS RESPONSE DATED: MAY 25, 2023

**TABLE 35 – SoCalGas: TABLE 3-SCG
ANNUAL GAS SUPPLY AND REQUIREMENTS – MMcf/d
ESTIMATED YEARS 2020-2024
COLD TEMPERATURE YEAR (1-IN-35 COLD YEAR EVENT) AND DRY HYDRO YEAR**

LINE		2020	2021	2022	2023	2024	LINE
CAPACITY AVAILABLE							
1	California Line 85 Zone (California Producers)	60	60	60	60	60	1
2	California Coastal Zone (California Producers)	150	150	150	150	150	2
Out-of-State Gas							
3	Wheeler Ridge Zone (KR, MP, PG&E, OEH) ¹⁾	765	765	765	765	765	3
4	Southern Zone (EPN, TGN, NBP) ²⁾	1,210	1,210	1,210	1,210	1,210	4
5	Northern Zone (TW, EPN, GST, KR) ³⁾	990	990	990	1,250	1,250	5
6	Total Out-of-State Gas	2,965	2,965	2,965	3,225	3,225	6
7	TOTAL CAPACITY AVAILABLE ⁴⁾	3,175	3,175	3,175	3,435	3,435	7
GAS SUPPLY TAKEN							
8	California Source Gas ⁵⁾	63	63	63	63	63	8
9	Out-of-State	2,477	2,534	2,550	2,497	2,417	9
10	TOTAL SUPPLY TAKEN	2,540	2,597	2,613	2,560	2,480	10
11	Net Underground Storage Withdrawal	0	0	0	0	0	11
12	TOTAL THROUGHPUT ⁶⁾	2,540	2,597	2,613	2,560	2,480	12
REQUIREMENTS FORECAST BY END-USE ⁷⁾							
13	CORE ⁸⁾						
14	Residential	683	677	667	668	648	13
15	Commercial	218	217	222	219	215	14
16	Industrial	55	53	53	52	51	15
17	NGV	42	43	43	44	45	16
17	Subtotal-CORE	998	989	985	974	959	17
18	NONCORE						
19	Commercial	52	52	52	53	52	18
20	Industrial	391	386	389	391	393	19
21	EOR Steaming	32	32	32	32	32	20
21	Electric Generation (EG)	669	727	740	706	654	21
22	Subtotal-NONCORE	1,144	1,197	1,214	1,183	1,131	22
23	WHOLESALE & Core	200	201	201	200	200	23
24	INTERNATIONAL Noncore Excl. EG	53	53	54	54	54	24
25	Electric Generation (EG)	113	124	126	118	106	25
26	Subtotal-WHOLESALE & INTL.	366	378	381	372	359	26
27	Co. Use & LUAF	32	33	33	32	31	27
28	SYSTEM TOTAL THROUGHPUT ⁹⁾	2,540	2,597	2,613	2,560	2,480	28

Response 11.2.1.

Confirmed.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.2. Referring to 2025, 2026, and 2027 in the workpaper to Table 21, please confirm that the amounts, 2,474 MMcf/d, 2457 MMcf/d, and 2397 MMcf/d, respectively, shown as cold-year average demand in line B are taken from Table 36, page 147, line 28, of the 2020 CGR and that the figures correspond to the total system throughput, not just the supply taken by the electric generators, which amounts to 654 (line 21) plus 107 (line 25) MMcf/d for 2025, 655 (line 21) plus 104 (line 25) MMcf/d for 2026 and 621 (line 21) plus 98 (line 25) MMcf/d for 2027. An excerpt from Table 36 is reproduced for convenience below:

**TABLE 36 – SoCalGas: TABLE 4-SCG
ANNUAL GAS SUPPLY AND REQUIREMENTS – MMcf/d
ESTIMATED YEARS 2025-2035
COLD TEMPERATURE YEAR (1-IN-35 COLD YEAR EVENT) AND DRY HYDRO YEAR**

LINE		2025	2026	2027	2030	2035	LINE
CAPACITY AVAILABLE							
1	California Line R5 Zone (California Producers)	60	60	60	60	60	1
2	California Coastal Zone (California Producers)	150	150	150	150	150	2
Out-of-State Gas							
3	Wheeler Ridge Zone (KR, MP, PG&E, OEH) ^{1f}	765	765	765	765	765	3
4	Southern Zone (EPN, TGN, NBP) ²	1,210	1,210	1,210	1,210	1,210	4
5	Northern Zone (TW, EPN, QST, KR) ^{3j}	1,250	1,250	1,250	1,250	1,250	5
6	Total Out-of-State Gas	3,225	3,225	3,225	3,225	3,225	6
7	TOTAL CAPACITY AVAILABLE ^{4f}	3,435	3,435	3,435	3,435	3,435	7
GAS SUPPLY TAKEN							
8	California Source Gas ^{5f}	63	63	63	63	63	8
9	Out-of-State	2,411	2,394	2,334	2,185	2,155	9
10	TOTAL SUPPLY TAKEN	2,474	2,467	2,397	2,248	2,218	10
11	Net Underground Storage Withdrawal	0	0	0	0	0	11
12	TOTAL THROUGHPUT ^{6f}	2,474	2,467	2,397	2,248	2,218	12
REQUIREMENTS FORECAST BY END-USE ^{7f}							
CORE ^{8f}							
13	Residential	641	632	623	598	593	13
14	Commercial	210	205	201	191	180	14
15	Industrial	50	49	48	45	40	15
16	NGV	45	46	47	49	52	16
17	Subtotal-CORE	948	933	920	883	865	17
NONCORE							
18	Commercial	53	52	52	52	52	18
19	Industrial	395	395	391	380	369	19
20	ECR Steaming	32	32	32	32	32	20
21	Electric Generation (EG)	654	655	621	537	533	21
22	Subtotal-NONCORE	1,134	1,135	1,096	1,000	985	22
WHOLESALE & INTERNATIONAL							
23	Core	200	199	199	198	199	23
24	INTERNATIONAL Noncore Excl. EG	54	54	54	54	54	24
25	Electric Generation (EG)	107	104	98	85	85	25
26	Subtotal-WHOLESALE & INTL.	361	358	350	337	339	26
27	Co. Use & LUAF	31	31	30	28	28	27
28	SYSTEM TOTAL THROUGHPUT ^{9f}	2,474	2,467	2,397	2,248	2,218	28

Response 11.2.2.

Confirmed.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.3. Please explain why it would be appropriate for any of the years 2024-2027 to multiply the percentage of EG demand served from the backbone system times the entire system throughput in attempting to attribute the amount of the backbone system that might be attributed to providing local transmission services.

Response 11.2.3.

SoCalGas calculated the percentage of the EG demand that is served directly from the backbone system and used that percentage to determine the contribution of the total system throughput that is providing a local transmission function to those customers.

11.2.4. Is SoCalGas claiming that, in 2024, because 27.8% of EG customer loads are projected to be served directly from the backbone that somehow 27.8% of all customer loads are projected to be served directly from the backbone system?

Response 11.2.4.

No.

11.2.5. Is SoCalGas claiming that, in 2025, because 35.0% of EG customer loads are projected to be served directly from the backbone that somehow 35.0% of all customer loads are projected to be served directly from the backbone system?

Response 11.2.5.

No.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.6. Is SoCalGas claiming that, in 2026, because 29.4% of EG customer loads are projected to be served directly from the backbone that somehow 29.4% of all customer loads are projected to be served directly from the backbone system?

Response 11.2.6.

No.

11.2.7. Is SoCalGas claiming that, in 2026, because 25.0% of EG customer loads are projected to be served directly from the backbone that somehow 25.0% of all customer loads are projected to be served directly from the backbone system?

Response 11.2.7.

No.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.8. Given that the 1-in-10 peak day forecast from the 2020 CGR shows the following Table 30 from page 140:

**TABLE 30 – WINTER 1-IN-10 YEAR COLD DAY DEMAND CONDITION
(MMcf/d)**

Year	SoCalGas Core ⁽¹⁾	SDG&E Core ⁽²⁾	Other Core ⁽³⁾	Noncore Non-EG ⁽⁴⁾	EG ⁽⁵⁾	Total Demand
2020	2,752	400	103	661	1,068	4,983
2021	2,732	399	104	659	1,072	4,967
2022	2,718	400	105	664	1,105	4,992
2023	2,698	398	105	668	1,106	4,975
2024	2,676	397	106	671	1,089	4,940
2025	2,652	395	107	674	1,119	4,948
2026	2,626	394	108	674	1,101	4,902

Notes:

(1) 1-in-10 peak temperature cold day SoCalGas core sales and transportation.
(2) 1-in-10 peak temperature cold day SDG&E core sales and transportation.
(3) 1-in-10 peak temperature cold day core demand of SWG, City of Long Beach, and City of Vernon.
(4) Noncore-Non-EG includes noncore Non-EG end-use customers of SoCalGas, SDG&E, SWG, City of Long Beach, City of Vernon, and all end-use customers of Ecogas.
(5) EG includes UEG/EWG Base Hydro, large cogeneration, industrial and commercial cogeneration (<20 MW), refinery-related cogeneration, and EOR-related cogeneration.

The EG peak day 1-in-10 demand is forecasted to be 1,089 MMcf/d in 2024. Please confirm the 691 MMcf/d shown in the workpaper to Table 21 as A x B amounts to 63% of the projected EG peak day 1-in-10 demand shown in Table 30 above.

Response 11.2.8.

SoCalGas does not confirm this.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.9. Please explain why 63% of projected EG peak day demand would be a correct figure to use in the determination of “reallocation” of the backbone system to local transmission function when according to SoCalGas’s workpapers only 27.8% of EG demands are served from the backbone system.

Response 11.2.9.

63% of projected EG peak day demand is not a correct figure and was not used in Chapter 8 (Seres) testimony nor was it used to determine the “reallocation” of the backbone system to local transmission function.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.10 Regarding the 2025 figure in the workpapers to Table 21, since SoCalGas is claiming that 35.0% of EG loads will be served from the backbone system, which it claims is 866 MMcf/d as the A x B figure. However, as shown above in Table 30 from the 2020 CGR, the projected EG peak day 1-in-10 demand is forecasted to be 1,119 MMcf/d in 2025, which means that the 866 MMcf/d represents 77% of the projected EG peak day 1-in-10 demand for 2025. Please explain why 77% of projected EG peak day demand is the correct figure to use in the determination of “reallocation” of the backbone system to local transmission function when according to SoCalGas’s workpapers only 35.0% of EG demands are served from the backbone system.

Response 11.2.10.

77% of projected EG peak day demand is not a correct figure and was not used in Chapter 8 (Seres) testimony nor was it used to determine the “reallocation” of the backbone system to local transmission function.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

11.2.11. Regarding the 2026 figure in the workpapers to Table 21, since SoCalGas is claiming that 29.4% of EG loads will be served from the backbone system, which it claims is 722 MMcf/d as the A x B figure. However, as shown above in Table 30 from the 2020 CGR, the projected EG peak day 1-in-10 demand is forecasted to be 1,101 MMcf/d in 2025, which means that the 866 MMcf/d represents 66% of the projected EG peak day 1-in-10 demand for 2025. Please explain why 66% of projected EG peak day demand is the correct figure to use in the determination of “reallocation” of the backbone system to local transmission function when according to SoCalGas’s workpapers only 29.4% of EG demands are served from the backbone system.

Response 11.2.11.

66 % of projected EG peak day demand is not a correct figure and was not used in Chapter 8 (Seres) testimony nor was it used to determine the “reallocation” of the backbone system to local transmission function.

**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 11 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

Question 11.3.

11.3. Please provide a copy of the attachments to TURN-02, Supplement.

Response 11.3.

See digital files, SDG&E – Form 1& 2 2022.pdf, and ferc_scg_annual_rpt_2022.pdf.