

**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 City of Ventura-SCG-DR 02)**

Date Requested: December 15, 2023, Submitted: January 31, 2024

DATA REQUEST NO. 18: At Page 2 of the Application You state that “we remain steadfast in our commitment to commitment to deliver safe, affordable, and increasingly clean energy to our customers and are dedicated to being a leader in the transition to California’s decarbonized energy system as we pursue our mission to becoming the cleanest, safest, and most innovative energy company in America.”

- a. Please explain what You mean by “increasingly clean energy.”
- b. Please explain how You define “being a leader in the transition to California’s decarbonized energy system”.
- c. Please identify and explain how You have measured or will measure whether You are the “cleanest” energy company in America.
- d. Please confirm whether You have utilized the tool of measurement You identified in Your response to Data Request No. 18, subpart “c” to identify Your current ranking in terms of being the “cleanest” energy company in America compared to other energy companies in America.
- e. If Your answer to Data Request No. 18, subpart “d” is “yes,” please provide Your current ranking.
- f. Please identify and explain how You have or will measure whether You are the “safest” energy company in America.
- g. Please confirm whether You have utilized the tool of measurement You identified in Your response to Data Request No. 18, subpart “f” to identify Your current ranking in terms of being the “safest” energy company in America compared to other energy companies in America.
- h. If Your answer to Data Request No. 18, subpart “g” is “yes,” please provide Your current ranking.

RESPONSE 18:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and

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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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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 SoCalGas's sustainability webpage for information on SoCalGas's sustainability strategy accessible here: [Sustainability | SoCalGas](#).
- b. SoCalGas's mission is underscored by the values of doing the right thing, championing people, and shaping the future. As the largest natural gas local distribution company in the nation, the decarbonization efforts of SoCalGas and the customers we serve can help the state achieve its long term climate goals.
- c. SoCalGas analyzes and tracks various initiatives and goals that support the company's decarbonization efforts and does not rely on a single measurement tool or metric. Some of this information is reported externally through various reporting avenues such as Sempra's annual Corporate Sustainability Report accessible here: [2022 Corporate Sustainability Report](#).
- d. As described above in response to 18c, SoCalGas tracks various initiatives and goals that support the company's decarbonization efforts and does not rely on any single measurement tool nor ranking system.
- e. Not applicable.
- f. SoCalGas tracks and analyzes various safety-related initiatives and goals and does not rely on any single measurement tool nor ranking system.
- g. As described in response to 18f, SoCalGas tracks and analyzes various safety-related initiatives and goals and does not rely on any single measurement tool nor ranking system.
- h. Not applicable.

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DATA REQUEST NO. 19:

Relating to Your statement on Page 2 of the Application that You “are a partner in the communities we serve, dedicated to improving local quality of life through devotion of energy, time, and financial support.”

- a. Please explain how You define being “a partner” in the communities You serve.
- b. Please explain how You devote “energy”.
- c. Please explain how You devote “time”.
- d. Please explain what You mean by “financial support” and provide examples thereof.
- e. Please explain how You devoting “energy, time, and financial support” improves local quality of life.

RESPONSE 19:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas also 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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. At SoCalGas, our commitment to provide customers with safe, reliable service goes beyond natural gas. SoCalGas is also dedicated to improving the quality of life in the communities we serve. We give our energy, time, financial support and focus our efforts in areas where we can make a difference. See: <https://www.socalgas.com/our-community>

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- b. See SoCalGas Community page where we describe our commitment to Community, through giving, scholarships, and empowering people. <https://www.socalgas.com/our-community/our-community-areas-of-giving>
- c. See Areas of Giving: <https://www.socalgas.com/our-community/our-community-areas-of-giving>
- d. See Areas of Giving: <https://www.socalgas.com/our-community/our-community-areas-of-giving>. See SoCalGas's GO 77 report at: [2022 REDACTED GO-77 FINAL Redacted.pdf \(socalgas.com\)](#)
- e. As noted above, SoCalGas provides energy, time, and financial support. These are resources that improve local quality of life because they are incremental to what is otherwise available.

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DATA REQUEST NO. 20:

Relating to Your identification on Page 7 of the Application that the Proposed Project includes “installing a perimeter block wall.”

- a. Please explain what You mean by a “perimeter block wall.”
- b. Please explain why You think a “perimeter block wall” is necessary.
- c. Do You propose to install a “perimeter block wall” for safety purposes?
- d. Do You propose to install a “perimeter block wall” to protect the local community from any blasts or explosions that might occur at the Ventura Compressor Station?

RESPONSE 20:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it seeks information that is equally available to the requesting party and fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The south and west perimeter fence lines are currently chain link and chain link with retaining wall, respectively. The project description describes the upgrade of the south and west property lines to masonry block walls.
- b. SoCalGas has experienced vandalism and theft at company facilities. A block wall provides greater security and visual screening of the facility.

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- c. The perimeter block wall is expected to enhance safety by deterring bad actors attempting to cause harm to key natural gas infrastructure.

- d. No.

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DATA REQUEST NO. 21: Relating to Your statement on Page 7 of the Application that Your “proposal for a hybrid design is a result of listening to the community and incorporating its feedback.”

- a. Please produce all Documents purporting to contain this “community feedback.”
- b. Please describe all other, non-written, “community feedback” You received related to the Proposed Project.

RESPONSE 21:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “non-written ‘community feedback’” in subsection b. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas received feedback from the community expressing concerns regarding air quality, the hybrid configuration was a technological response to these concerns. See PEA Appendix G and Feasibility Study at: [2. Final-Feasibility Study SoCalGas_04082022.pdf](#). See

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non-privileged attachments, note attachments have been redacted to protect the privacy of individuals. Two documents that are responsive to this question are protected under attorney-client privilege and are not being produced.

Attachments:

- VCM_A2308019_CoV_SCG_02_Q21_Attach_01_2021MayReport
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_02_2021OctVirtualQandA
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_03_2021OctReport
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_04_2022AprilReport
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_05_2022AprilVirtualQandA
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_06_2023MarchComments
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_07_2023MarchVirtualQandA
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_08_2023MarchComments
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_09_CanvassingLog
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_10_AdPlacementsonSite
 - VCM_A2308019_CoV_SCG_02_Q21_Attach_11_CallAndEmailLog
- b. Since 2021, SoCalGas briefed local stakeholders about the planned project work. This included hosting eight community workshops in April/May 2021 and seven project town halls meetings in October 2021, six public forum meetings in March 2022, and three in March 2023. During these meetings SoCalGas received non-written feedback consisting of general themes related to safety, proximity to schools and neighborhood, as well as closing or relocating.

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DATA REQUEST NO. 22:

Relating to Your statement on Page 7 of the Application that the Proposed Project “promotes California’s decarbonization goals,” please explain how the Proposed Project promotes California’s decarbonization goals.

RESPONSE 22:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it seeks information equally available to the requesting party and fails to identify a relevant time period. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The Proposed Project promotes California’s decarbonization goals, by maintaining adequate inventory at the La Goleta Storage Field. La Goleta is critical to the reliability in the North Coastal System as well as the reliability of SoCalGas’s entire system. The California Council on Science & Technology concludes that “Gas storage provides crucial hourly balancing for the gas system in all seasons. Without gas storage, California would be unable to accommodate the electricity generation ramping that now occurs nearly every day and that may increase as more renewables are added to the grid.”¹ Therefore the Proposed Project aligns not only with SoCalGas’s sustainability strategy to improve local air quality in our communities; it also aligns with and promotes California’s decarbonization goals and increases the State’s climate resilience through the energy transition. The California Air Resources Board’s 2022 Scoping Plan² acknowledges the key role gas-fueled electric generation plays in maintaining reliability and assumes the existing

¹ California Council on Science and Technology, Long-Term Viability of Underground Natural Gas Storage in California: An Independent Review of Scientific and Technical Information at 504 (Conclusion 2.4) (emphasis added), available at: https://ccst.us/wp-content/uploads/Full-Technical-Report-v2_max.pdf.

² California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality (November 16, 2022), available at: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> at 198.

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fleet of gas-fueled electric generation remains as an available resource.”

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DATA REQUEST NO. 23:

Relating to Your statement on Page 8 of the Application that the Proposed Project will not “expand the authorized injection capacity at the La Goleta Storage Field,” will the Proposed Project, if built, potentially increase the amount of gas injected into the La Goleta Storage Field compared to the amount of gas currently injected in the La Goleta Storage Field?

RESPONSE 23:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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.

To the extent that the current limitations at the Ventura Compressor Station require SoCalGas to maintain at least 7.5 BCF of working gas in inventory at the La Goleta Storage Field throughout the winter season, and that the Proposed Project will remove this limitation and restore full use of the authorized working gas inventory capacity of 21.5 BCF, more gas supply could potentially be injected into the La Goleta Storage Field relative to today. There is no expansion of any storage capacity associated with the Proposed Project.

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DATA REQUEST NO. 24:

Relating to Your statement on Page 8 of the Application that the Commission has “recognized the importance of increasing the horsepower and replacing the aging infrastructure at the Ventura Compressor Station and, accordingly, authorized prior versions of the Proposed Project.”

- a. Please provide citations to support Your assertion that the Commission has “recognized the importance of increasing the horsepower and replacing the aging infrastructure at the Ventura Compressor Station.”
- b. Please provide citations to support Your assertion that the Commission has “authorized prior versions of the Proposed Project.”

RESPONSE 24:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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 Application pages 48 and 49. As noted in Commission Decision D.19-09-051 on SoCalGas’ 2019 GRC application, the CPUC found that:

“With respect to the requested amounts for this GRC, we note that other largescale projects are being planned specifically for the **Ventura Compressor Station** and the Honor Rancho Compressor Station (and the Moreno Compressor station for SDG&E). **Because we recognize the importance of the proposed projects and the role of compressor stations in maintaining operational reliability and safety of the gas transmission system, we find that it is prudent and reasonable to authorize the proposed projects and for SoCalGas to have the necessary funding to conduct these projects (and Moreno Compressor station for SDG&E).** At this

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point, we do not find it necessary to deviate from current GRC practice and authorize funding only for specific projects because of the large scope covered in the GRC and because of the many challenges associated with planning and executing multiple and large projects within a specified timeframe. We do however encourage SoCalGas to place a high priority on critical projects under this category as most of its compressors are over 50 years old and because of key risks that need to be mitigated in this area. Therefore, **we find that the requested amounts for Compressor Stations should be authorized.**" [emphasis added] (D.19-09-051 at pps. 116-117 available at: docs.cpuc.ca.gov/PublishedDocs/Published/G000/M316/K704/316704666.PDF).

b. See 24a.

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DATA REQUEST NO. 25:

Regarding the objectives of the Proposed Project, as listed on Page 9 of the Application, is one of Your objectives to respond to and incorporate community feedback?

RESPONSE 25:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects to this request on the ground it is argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of "You" and "Your," SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

As identified on page 51 in the Community Values section and page 133 of the ESJ Goal 1 "Integrate equity and access to CPUC activities and decision-making that will impact the residents of the ESJ community," feedback was incorporated. It is not listed in the Project Objectives on page 9 of the application.

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DATA REQUEST NO. 26:

Regarding gas storage fields and Your statement on Page 11 of the Application that storage fields are “critical throughout the year to support electricity generation.”

- a. Please identify and describe all gas leaks that have occurred at Your gas storage fields in the last 10 years.
- b. Do compressor stations have the potential to leak gas and cause harm to the local community like the harm caused by the Aliso Canyon gas leak?

RESPONSE 26:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it invokes time period dating back 10 years. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See SB1371 report, available at: <https://www.socalgas.com/regulatory/R1501008>
- b. No, compressor stations do not store gas like a storage facility.

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DATA REQUEST NO. 27:

Regarding Your statement at Page 20 in the Application that “Electrification is dependent on local factors, and SoCalGas does not have electrification data specifically for this part of the system.”

- a. Did You consider electrification of load as an alternative in Your Application?
- b. If Your answer to Data Request No. 27, subpart “a” is “yes,” how did You analyze electrification as an alternative if You do not have electrification data specifically for this part of the system?

RESPONSE 27:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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.
- b. As described further in the Application (starting on page 77), SoCalGas assessed the amount of non-winter gas load that would need to be reduced to achieve the relevant project objectives. SoCalGas determined that even if all non-winter load was eliminated, it would still fall short of meeting the project objectives. However, to fully respond to the requirements of General Order 177 (GO 177, § VI(A)(4)), SoCalGas provided some high-level analysis to estimate the costs of pursuing this level of electrification. This initial analysis was based on recent, publicly available cost estimates for electrifying campus housing units at California State University Monterey Bay (CSUMB), as presented in PG&E’s Application³. This cost estimate was premised on relatively straightforward electrification that addressed only a limited set of gas appliances and did not require customer-side

³ Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M496/K451/496451495.PDF>

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electric panel/circuit or utility-side electric infrastructure upgrades. Realistically, the building stock in the communities served by the project is likely to include a broader, more diverse set of gas appliances, and at least some portion of buildings are likely to require customer-side electric panel/circuit and/or utility-side electric infrastructure upgrades – factors that will almost certainly cause actual costs to be materially higher than the CSUMB electrification estimate represents. Developing a more accurate estimate of expected electrification cost would require substantial time and financial investment, including potential field surveys of actual gas appliance and electrical system conditions at customer premises. Considering that scaling the low-end estimate based on CSUMB yielded an electrification cost that was an order of magnitude higher than that project cost – accounting only for electrification of the residential sector and not including any feasibility or detailed cost estimates expected to increase costs and challenges associated with this alternative – SoCalGas determined that this alternative could be dismissed at this phase and further analysis that would only prove to make this alternative less viable would not be a prudent use of resources.

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DATA REQUEST NO. 28:

Footnote 15 at Application Page 21 says “SoCalGas does not produce area-specific forecasts ... Figure 15 is based on a systemwide forecast that has been adjusted based on an estimate for the North Coastal System.”

- a. Please explain how You “adjusted” the systemwide forecast to estimate a forecast for the North Coastal System.
- b. Please explain why You selected the methodology described in Your response to Data Request No. 28, subpart “a” for adjusting the systemwide forecast to estimate a forecast for the North Coastal System.

RESPONSE 28:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “methodology” in subsection b. as it assumes a known or specific methodology was used. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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.

Footnote 15 for Figure 5 on page 21 of the Application is incorrect, the figure depicts actual customer demand. Additionally, Footnote 20 for Figure 6 on page 28 is incorrect and is the same actual customer demand.

- a. See Page 20 of the Application b. Gas Demand in the North Coastal System
- b. See 28a.

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DATA REQUEST NO. 29:

The Application at Page 30 says that “When the existing compressors at the Ventura Compressor Station were configured in the 1980s, they were sized taking into account local producer daily supply of 50 to 90 MMcfd. That assumption was true at the time but no longer is: currently, *10 MMcfd or less* (roughly 85% less supply than historically) is typically received from local production.”

- a. Please provide all Documents and other evidence that support Your assertion that the projected producer daily supply of 50 to 90 MMcfd was “true at the time but no longer is.”
- b. Please produce all Documents relating to Your assertion that a forecast of 50 to 90 MMcfd was “true at the time,” including, but not limited to, all Documents or other evidence that suggests a projected producer daily supply of less than 50 to 90 MMcfd.
- c. Please produce all Documents and other evidence that support Your assertion that currently 10 MMcfd or less is typically received from local production.

RESPONSE 29:

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 further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents” and “other evidence” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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- a. SoCalGas did not state that producer supplies were “projected.” As stated in City of Ventura DR 1 Response 3b, SoCalGas does not forecast supplies. See non-privileged attachment for North Coastal producer supplies from 2010 through 2022 used for Figure 4 on page 19 of the Application.

Attachment:

- VCM_A2308019_CoV_SCG_02_Q29_Attach_01_NCostalProducers
- b. See 29a.
 - c. See 29a.

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DATA REQUEST NO. 30:

Please provide all Documents related to Your assertion in the Application at Page 31 that “gas demand [in the North Coastal System] is expected near existing levels over the next decade.

RESPONSE 30:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents related” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

See the Application at page 57 and 2022 California Gas Report available at: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf. Also see Response to Q28 a. and b, and non-privileged attachment.

Attachment:

- VCM_A2308019_CoV_SCG_02_Q30_Attach_01_NCostalDemand

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DATA REQUEST NO. 31:

The Application at Page 32 says that “for two weeks a year, the North Coastal System is completely dependent on the concurrent availability of the Ventura Compressor Station.”

- a. Please explain what You mean by “completely dependent.”
- b. By “completely dependent,” do You mean the entire North Coastal System would lose service if the Ventura Compressor Station goes out of service during this two-week period?
- c. Do You have a contingency plan in case the Ventura Compressor Station, in its current configuration, goes out of service during the two-week period (*e.g.*, during an earthquake or tsunami)?
- d. Is the Ventura Compressor Station in a location designated as a tsunami hazard zone or similar by any state or local agency?
- e. Is the Ventura Compressor Station in a location designated as an earthquake hazard zone or similar by any state or local agency?

RESPONSE 31:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The only source of supply to the North Coastal System from SoCalGas while the La Goleta Storage Field is shut-in for annual compliance activities is through the Ventura Compressor

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Station.

- b. SoCalGas could serve some, but not all, demand on the North Coastal System without the La Goleta Storage Field or the Ventura Compressor Station.
- c. In the unlikely emergency situation where the Ventura Compressor Station goes out of service, due to a force majeure event while the La Goleta Storage Field is shut in for compliance activities, SoCalGas would as soon as practical, resume operations at the storage field as necessary to maintain service to our customers. The compliance activity would then be rescheduled for a later period.
- d. The Ventura Compressor Station is not in a location designated as a tsunami hazard zone or similar by any state or local agency. See Section 5.10.1.6, Flooding (page 5.10-4) of the Hydrology and Water Quality section of the PEA for more detail.
- e. SoCalGas is interpreting “earthquake hazard zone” to mean “Alquist-Priolo Zone for surface fault rupture hazard.” The Ventura Compressor Station is not located within an Alquist-Priolo Zone for surface fault rupture hazard. The Ventura Compressor Station site has been identified by the California Geologic Survey and County of Ventura as being within a liquefaction hazard zone and is therefore potentially subject to liquefaction during a seismic event. Based on the relatively flat topography, there is no potential for lateral spreading to occur at the site. See Section 5.7.1.2, Seismic Hazards (page 5.7-1 through 5.7-3) of the Geology, Soils and Paleontological Resources section of the PEA.

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DATA REQUEST NO. 32:

The Application at Page 36 says that “storage utilization is impacted by the Aliso Canyon Withdrawal protocol.”

- a. What is the Aliso Canyon Withdrawal protocol?
- b. Was the Aliso Canyon Withdrawal protocol implemented as a safety measure to protect against additional leaks at Your Aliso Canyon storage facility?
- c. Please provide a copy of the Aliso Canyon Withdrawal protocol.

RESPONSE 32:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound, argumentative, and calls for speculation. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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. The Aliso Canyon Withdrawal Protocol (ACWP) was a set of requirements implemented by the California Public Utilities Commission (CPUC) that specified what conditions must be met before SoCalGas could withdraw gas from the Aliso Canyon Storage Field. The ACWP was terminated by the CPUC on September 15th, 2023. Available at: [CPUC Letterhead \(Brown\) \(ca.gov\)](#)
- b. See objections.
- c. Available at ACWP: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/news_room/newsupdates/2020/withdrawalprotocol-revised-april12020clean.pdf

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DATA REQUEST NO. 33:

The Application at Page 37 says that “Since the La Goleta Storage Field injection capacity reduction was posted to ENVOY in 2013, SoCalGas was not able to achieve full, or even nearly full, status by the beginning of the winter operating season on two occasions.”

- a. What is “full” status?
- b. What is “nearly full” status?
- c. Who defines “full” status?
- d. How was “full” status defined?
- e. What studies have You undertaken to determine and/or confirm that “full” status is appropriate or safe?

RESPONSE 33:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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 page 35 of the Application for the maximum inventory capacity of the La Goleta Storage Field.
- b. Please refer to page 37 of the Application for the inventories achieved during the two occasions.
- c. The California Geologic Energy Management Division (CalGEM).
- d. The difference in inventory between the minimum and maximum allowable storage reservoir pressures.

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- e. SoCalGas operates and maintains its storage field consistent with CalGEM requirements and procedures approved by CalGEM. CalGEM's electronic database, WellSTAR, contains access to important, sortable data in a single portal to further its commitment to public safety and environmental protection by providing transparency. The release of WellSTAR ensures compliance with CalGEM's Well Stimulation Treatment and Well Maintenance regulations, as well as other state and federal requirements. Link to WellSTAR:
<https://wellstar-public.conservation.ca.gov/>

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DATA REQUEST NO. 34:

Please explain what You mean by a “cold winter” in the Application at Page 37 and whether You would define it as greater than a once-in-every-ten-years event, considering that it has been over 10 years since “the La Goleta Storage Field injection capacity reduction was posted to ENVOY in 2013,” per the Application at 37.

RESPONSE 34:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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.

Please refer to the 2022 California Gas Report (CGR) page 117: “The cold design temperature conditions are based on a statistical likelihood of occurrence of 1-in-35 on an annual basis.” 1-in-35 is in fact greater than 1-in-10. Available at: [California Gas Report | SoCalGas](#)

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DATA REQUEST NO. 35:

The Application at Page 39 says that the “existing compression equipment at the Ventura Compressor Station does not allow for the inventory at the La Goleta Storage Field to be fully recovered year after year if the examination begins with the field fully depleted at the end of the winter season.”

- a. Please identify the years in the previous 10 years in which the La Goleta Storage Field was fully depleted at the end of the winter season.
- b. Did You operate the La Goleta Storage field in a safe and prudent manner over the past 10 years considering that the “existing compression equipment ... does not allow for the inventory at the La Goleta Storage Field to be fully recovered year after year if the examination begins with the field fully depleted at the end of the winter season”?
- c. Please produce all Documents, including any studies or reports, that indicate the prudent and safe level of storage at the La Goleta Storage Field.
- d. What actions have You taken to address Your inability to fully recover the inventory at the La Goleta Storage Field year after year, as You describe at Application Page 39?

RESPONSE 35:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “safe and prudent manner.” 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas

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objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for "all Documents" as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Please refer to page 37 and Figure 9 in the Application.
- b. SoCalGas interprets "safe and prudent manner" as maintaining an inventory sufficient for reliability. Please refer to page 5 and 35 of the Application.
- c. Please refer to Response 35a of this data request and non-privileged attachment.

Attachment:

- VCM_A2308019_CoV_SCG_02_Q35_Attach_01_1987GoletaDOGGRltr
- d. Please refer to the Application in its entirety, specifically pages 47-50 and footnotes 24, 25, 26, 27, 28, and 31.

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DATA REQUEST NO. 36:

The Application at Page 40, Figure 12 (“La Goleta Storage Field Summer Withdrawal Totals”) indicates higher than average withdrawals in 2016 (in excess of 2,600 MMcf) and 2022 (nearly 2,400 MMcf), yet the Application at Page 28, Figure 6 (“North Coastal System Annual Customer Demand and Producer Supply Chart”) does not indicate that annual customer demand in 2016 or 2022 was much different than other years and, if anything, actually decreased from 2013. Please reconcile these two data sets (Figure 12 and Figure 6).

RESPONSE 36:

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 objects to this request on the grounds it is vague and ambiguous, particularly with reference to the term “reconcile” and phrase “much different than other years.” SoCalGas further objects to this request on the ground that it is argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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.

There is nothing to reconcile as the two data sets (Figure 12 and Figure 6) are not in conflict. Please refer to Data Request City of Ventura-SCG-01 Response 2b, available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)

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DATA REQUEST NO. 37:

Regarding Your “commitment” in the Application at Page 46 to “prioritize the new electric compressors as ‘first on’ and ‘last off’ during normal operations of the facility.”

- a. Please describe all elements of this “commitment,” including any exceptions and seasonal variations, and whether You are entering into a binding contract with an entity or local agency to “prioritize the new electric compressors as ‘first on’ and ‘last off’ during normal operations of the facility.”
- b. Please state all laws or Commission rules that bind You to this commitment.
- c. Are You proposing that the CPCN, if any is issued, bind You to this commitment?
- d. Do You propose to honor this commitment year round, or only during certain months?

RESPONSE 37:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound, argumentative, and calls for legal conclusions. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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- a. Electric compressors will be prioritized for use during normal operations of the facility and consistent with SoCalGas' prudent operation practices which include consideration of overall system safety, integrity and reliability. Exceptions would include operation of the facility during power outages, during PSPS events in which electrical supply is shut-off, or during maintenance of an electric-driven compressor. SoCalGas is not entering into a binding contract with regard to electric compressor utilization. The control philosophy, which describes how the compressors would be operated, would be developed during the detailed engineering phase of the project.
- b. See objections.
- c. SoCalGas is committed to complying with the conditions set forth by the Commission in the CPCN language of the CPCN.
- d. Refer to Response 37a.

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DATA REQUEST NO. 38:

The Application at Pages 47-48 describes the Direct Testimony of Raymond K. Stanford submitted as part of Your 2016 General Rate Case (“GRC”) application as proposing improvements to the Ventura Compressor Station, including an increase in horsepower, and goes on to say that “the 2016 GRC revenue requirement was authorized.”

- a. Was an increase in horsepower authorized by the Decision in Your 2016 GRC? If so, please provide the citation thereto.
- b. Did You complete the work to increase the horsepower as authorized?
- c. If Your answer to Data Request No. 38, subpart “b” is “no,” why not?

RESPONSE 38:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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. The 2016 rate request included a detailed projection of estimated cost to deliver natural gas from 2016 to 2019. In the direct testimony of Raymond K. Stanford (Gas Engineering), the proposed improvements at the Ventura Compressor Station include an increase in horsepower from 3,300 to 15,000. As described on page RKS-70:

“Future utilization of this station is to meet Goleta’s summer injection requirements and to meet the summer load gas demand on the coastal system impacted by a reduction in local gas production, namely from Pacific Offshore Production Company site. Meeting these needs will require 15,000 horsepower at the Ventura Station.”

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Upon adoption of several settlement agreements in 2015, the 2016 GRC revenue requirement was authorized. Documents available at: [Proceeding - Documents \(ca.gov\)](#)

- b. No. See 2019 GRC Testimony SCG-07-CWP: “The scope of the Ventura Compressor Replacement Project proposed in the 2016 General Rate Case was subject to the same FEED process as Blythe and similarly was revised. The scope revision includes the addition of supporting system replacement and back-up unit design criteria. This revision has impacted both cost and schedule. Due to the expected completion date of later phases extending into 2021 or 2022, there are no explicit cost representations or revenue requirement for this project in this General Rate Case. The project and revised capital expenditures for this project will be presented in a future General Rate Case with a significantly more detailed scope than presented in the TY 2016 General Rate Case forecast. While SoCalGas spent some of its allocation of authorized 2016 capital to complete a substantial FEED for Ventura Station, significant scope change and challenges in permitting and logistics have required us to extend the execution schedule and in-service date beyond this General Rate Case cycle. Ventura Station is critical to the continued ability of SoCalGas to meet its obligation to serve customers. The continued reliable operation of this station will be needed, in part, to compensate for the continued decline in offshore gas supplies entering into the North Coastal pipeline system as the associated gas and oil fields are drawn down. Additional details on the Ventura Compressor Replacement project, including the forecasted capital expenditures and post-test year investment, are provided in the Supplemental Workpaper in Exhibit SCG-07-CWP, Workpaper Group M03350.” Referenced documents available at: [A.17-10-008 - SoCalGas 2019 General Rate Case – October 6, 2017 | SoCalGas](#)
- c. Subsequent to the 2016 GRC filing, additional Front-End Engineering Design (FEED) resulted in cost and scope revisions compared to the scope of work and cost provided in the 2016 GRC. See Response 38b and Application starting on page 47.

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DATA REQUEST NO. 39:

The Application at Page 48 asserts that the Commission “authorized the compressor modernization project and necessary funding ...”

- a. Please provide the citation that supports Your assertion that the Commission “authorized the compressor modernization project and necessary funding ...”.
- b. If the Commission authorized the compressor modernization project and the necessary funding in 2019, why did You not complete the project?

RESPONSE 39:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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. Refer to Response 24.
- b. SoCalGas was well underway with the project as FEED was completed in 2020 and an EPC contract was executed in 2021 to complete detailed engineering design and proceed directly into procurement and construction thereafter. See Application page 49 which states *“SoCalGas commenced detailed design under the EPC contract, but in August 2021, the Commission requested that SoCalGas halt engineering activities, conduct stakeholder outreach, and prepare a feasibility study to evaluate alternative compressor equipment configurations and alternative site locations for the planned project. In response, SoCalGas halted design activities and focused on addressing the Commission’s requests for nearly a year (including the stakeholder outreach activities described infra).”*

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DATA REQUEST NO. 40:

You state in the Application at Page 49 that the Commission “requested that SoCalGas halt engineering activities, conduct stakeholder outreach, and prepare a feasibility study to evaluate alternative compressor equipment configurations and alternative site locations for the planned project.”

- a. Please provide a source/citation for this assertion.
- b. Please produce all Document(s) in which the Commission made this request and that relate to this request.
- c. Please identify the date on which the Commission made this request.
- d. If the Commission told You why it was making this request, please identify the reason the Commission gave You for making this request.
- e. Please identify the alternative site locations You identified in response to this request and why You selected those alternative site locations.
- f. Upon identifying alternative site locations, what due diligence did You undertake to determine whether these site locations were available for purchase?

RESPONSE 40:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge, including, but not limited to, speculation as to the Commission’s reasons for taking certain actions. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request

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for “all Documents” and documents that “relate” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Letter to Scott Drury from Commission Executive Director Rachel Peterson dated August 5, 2021. Publicly available at: [Natural Gas and Oil Pipeline Regulation \(ca.gov\)](#).
- b. Publicly available at: [Natural Gas and Oil Pipeline Regulation \(ca.gov\)](#)
- c. August 5, 2021.
- d. Refer to Response 40b.
- e. See March 2022 Feasibility Study. Publicly available at: [Ventura Compressor Modernization Project | SoCalGas](#)
- f. SoCalGas determined that the site locations were owned by private landowners.

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DATA REQUEST NO. 41:

You state in the Application at Pages 49-50 that in June 2022 You “submitted a letter to the Commission memorializing the completion of the directives” that You described in the Application at Page 49.

- a. Please produce this letter.
- b. Produce all Documents and other evidence that relate to Your assertion that You complied with each Commission directive.

RESPONSE 41:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents” and “other evidence” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Publicly available at: [Natural Gas and Oil Pipeline Regulation \(ca.gov\)](https://www.socalgas.com/natural-gas-and-oil-pipeline-regulation)
- b. Refer to Response 41a and [Ventura Compressor Modernization Project | SoCalGas.](#), See Ventura-SCG-DR 01 Q16a; and Response 21a.

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DATA REQUEST NO. 42:

You state in the Application at Page 50 that You “again modified the scope of the project and included it in [Your] Test Year 2024 GRC Application filed in May 2022.”

- a. How did You modify the scope of the project for inclusion in Your Test Year 2024 GRC Application?
- b. Please explain what You mean by “again” by identifying and explaining the previous modifications.

RESPONSE 42:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the request to explain the term “again” and phrase “explaining the previous modifications” within the context of subsection b. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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. Scope development has been previously explained in the workpapers of 2016 and 2019 GRC testimonies as well within the Procedural History starting on page 47 of the Application. See Response 38.
- b. b. Refer to Response 42a. and Application Page 47 Section III Part H Procedural History.

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DATA REQUEST NO. 43:

Regarding Your discussion of “Community Values” in the Application at Pages 51-53.

- a. Are “Community Values” defined by code, regulation, or precedent? If so, please provide the source.
- b. If Your answer to Data Request No. 43, subpart “a” is no, please provide Your definition of “Community Values.”
- c. Please explain how You know that the Proposed Project “will not adversely affect community values,” per the Application at Page 51.
- d. Are You aware that the City posted for public review from October 31-December 12, 2022 a draft Climate Action and Resilience Plan (“CARP”) that “proposes focused solutions to reduce greenhouse gas emissions while advancing related goals associated with community resilience and climate adaptation?” (City of Ventura, *Climate Action and Resilience Plan*, Public Review Draft October 2022, available at <https://www.planventura.com/related-projects#:~:text=The%20Climate%20Action%20and%20Resilience,31%2DDecember%2012%2C%202022.>)
- e. Do You consider a goal of reducing greenhouse gas emissions to be a “Community Value?”
- f. What studies have You done to support Your assertion in the Application at Page 52 that the Proposed Project “will have a favorable economic impact on both the City and County of Ventura?”
- g. Please produce all Documents that relate to Your assertion in the Application at Page 52 that the Proposed Project “will have a favorable economic impact on both the City and County of Ventura.”
- h. You assert in the Application at Page 52 that You have “been a partner in the community, supporting local nonprofits.” Please describe the support You have given to local nonprofits.
- i. Have You made financial contributions to local nonprofits in the City?
- j. If Your answer to Data Request No. 43, subpart “i” is “yes,” were these financial contributions made with ratepayer (*i.e.* customer) funds?
- k. Please describe the actions You took to “solicit and facilitate community input” (Application at Page 52).
- l. Please produce all Documents in which You address or discuss the community feedback You received in response to the “robust public outreach plan” You described in the Application at Page 52.
- m. Did You exclude any groups or any City representatives or legal counsel for the City from participating in the meetings and open houses You held to obtain stakeholder feedback?

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RESPONSE 43:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and because it fails to identify a relevant time period for subsections of the request. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas's knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for "all Documents" as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See objections.
- b. Not applicable.
- c. As stated in the application on pages 51-53, SoCalGas describes how the project supports community values through supporting the integrity of the integrated electric and gas energy system, reliably serving residents and critical facilities, promoting affordability, reducing emissions, generating local jobs and tax revenue, and incorporating the feedback of the community into the Proposed Project. SoCalGas has been a partner in the community, has implemented a robust public outreach plan to inform the community about the Proposed Project and to solicit and facilitate community input and obtain stakeholder feedback (See PEA Appendix G). As a result of stakeholder feedback, SoCalGas modified the Proposed Project to include a hybrid configuration.

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- d. Yes. The City of Ventura’s Climate Action and Resilience Plan is discussed in the Regulatory Setting of the Greenhouse Gas Emissions Section of the PEA. See Section 5.8.2.4, Local, of the Regulatory Setting of the Greenhouse Gas Emissions Section of the PEA (page 5.8-7).
- e. Yes, as stated in the application on page 51 in the Community Values section, reducing emissions, by replacing the three existing aging gas compressors with a hybrid configuration featuring two new electric compressors and two new gas compressors equipped with state-of-the art emission control technology will enhance reliability and reduce permitted NOx and ROC emissions by approximately 75 percent each compared to the existing compressor units at the facility today.
- f. SoCalGas did not complete an economic study as part of the CPCN Application. As explained in the application, the Project will create temporary construction-related jobs over an approximate 30-month period, estimated to employ up to approximately 130 workers. During the construction period, it is anticipated that the local economy will experience a correlative increase in retail and sales tax revenue due to the workforce employed in the area.
- g. Refer to Response 43f.
- h. Refer to Response 19.
- i. Yes.
- j. No.
- k. Refer to PEA Appendix G.
- l. Refer to Response 21. See also [Ventura Compressor Modernization Project | SoCalGas](#)
- m. No.

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DATA REQUEST NO. 44:

The Application at Page 57 asserts an expected useful life of 50 years for the new compression equipment.

- a. On what basis do You expect a useful life of 50 years?
- b. Have You considered whether the new compression equipment might be a stranded asset?
- c. Please produce all Documents relating to Your consideration of whether the new compression equipment that You propose installing as part of the Proposed Project may end up being a stranded asset.

RESPONSE 44:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase "stranded asset" in subsections b. and c. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. . Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas assumes a 50 year useful life based on the depreciable life of asset category G-368 Compressor Station Equipment, as approved in SoCalGas's TY2019 GRC (D.19-09-051), see <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M316/K704/316704666.PDF>
- b. The useful life is subject to revision in a future GRC. See Application page 59.
- c. No.

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d. N/A based on response to 44b.

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DATA REQUEST NO. 45:

You assert in the Application at Page 64 that You are “in regular communication with first responders, including the Ventura City Fire Department ... the primary emergency response agency for an emergency natural-gas-related incident at the Ventura Compressor Station.”

- a. Please produce copies of all Documents reflecting correspondence with the Ventura City Fire Department.
- b. How many times in each of the previous 10 years has the Ventura City Fire Department responded to a natural-gas-related incident at the Ventura Compressor Station?
- c. For each incident identified in response to Data Request No. 45, subpart “b”, please provide the results of any root cause analysis performed to determine the cause of the natural-gas-related incident.
- d. How does the natural-gas-related incident rate (*i.e.*, number of incidents/year) compare to that same rate at Your other compressor stations?

RESPONSE 45:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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 or otherwise within the custody of requester concerning correspondence with the Ventura City Fire Department, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or

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evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for "all Documents" as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See City of Ventura-SCG-01 Question 8. See non-privileged attachments for documents from 2021, 2022, 2023, note attachments have been redacted to protect the privacy of SoCalGas employees.

Attachments:

- VCM_A2308019_CoV_SCG_02_Q45_Attach_01_2021FireCorr
 - VCM_A2308019_CoV_SCG_02_Q45_Attach_02_2022FireCorr
 - VCM_A2308019_CoV_SCG_02_Q45_Attach_03_2023SignInSheet
- b. There has been one instance when the VCFD has responded to a natural gas incident. SoCalGas provides updates to the City of Ventura, which include Ventura City Fire Chief David Endaya. Ventura City Fire has participated in several briefings with SoCalGas. Ventura City Fire was invited to tour the Ventura Compressor Station and several personnel attended the tour on February 23rd, 2022. Additionally, SoCalGas offers fire districts throughout our service territory annual natural gas safety workshops.
 - c. On July 2, 2021, a safety shutdown took place while performing a control system verification check. A system reboot was triggered resulting in the station going into a failsafe mode, shutting down and depressurizing all running units. See City of Ventura-SCG-01 Data Request Question 8.
 - d. SoCalGas objects as "natural gas related incidents" is not defined, SoCalGas responds incidents as described in 45C are not compared between compressor stations.

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DATA REQUEST NO. 46:

According to the Application at Pages 66-67, You have not determined the size of the electric-driven compressors You propose to install as part of the Proposed Project.

- a. Why not?
- b. When will You decide the size of the electric-driven compressors?
- c. On what basis and in consideration of which factors will You base the size of the electric-driven compressors?
- d. Please explain how You have estimated total costs for the Proposed Project without knowing the final size of the electric-driven compressors.

RESPONSE 46:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas has estimated the electric-driven compressors (EDC) to have a range between 2000-2500hp based on preliminary engineering; however, further engineering by a compressor vendor during FEED will need to be completed to finalize the EDC sizing.
- b. After completion of Front-End Engineering Design (FEED).

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- c. Design suction and discharge pressures and temperatures, station design flow, equipment performance guarantees.
- d. SoCalGas obtained vendor pricing which was based on the assumed horsepower. The range in available compressor sizes required to meet the project demands are limited and the potential difference in cost from one size to another falls within the estimate accuracy range of a Class 3 estimate⁴.

⁴ AACE (Association for the Advancement of Cost Engineering) Class 3 estimate range of accuracy +30%/-20%

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DATA REQUEST NO. 47:

Regarding Your assertion in the Application at Page 67 that “GHG emissions associated with the projected future operation of the Proposed Project are anticipated to be similar to those associated with the operation of the existing Ventura Compressor Station.”

- a. How do You explain that the total greenhouse gas (“GHG”) emissions will be similar, considering the inclusion of two electric-driven compressors and Your “commitment” in the Application at Page 46 to “prioritize the new electric compressors as ‘first on’ and ‘last off’ during normal operations of the facility?”
- b. Would GHG emissions associated with the projected future operation of the Proposed Project be similar to the operation of the existing Ventura Compressor Station if You used only electric-driven compressors as part of the Proposed Project?
- c. In asserting that GHG emissions associated with the projected future operation of the Proposed Project are anticipated to be similar to those associated with the operation of the existing Ventura Compressor Station,” what assumptions are You making about Your anticipated usage of the gas-driven compressors and electric- driven compressors as part of the Proposed Project?

RESPONSE 47:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge, including, but not limited to, the hypothetical premise of subsection b. SoCalGas objects to the extent the request

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seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas will prioritize the operation of the electric units on a "first-on and last-off basis," as described in our response to 37 and 59c. GHG emissions for the existing facility were calculated based on actual historical operations of existing equipment. Total emissions for the existing facility total approximately 4,994 metric tons of CO₂e per year. The Proposed Project anticipates installing two 2,500 nominal HP electric compressors with two 1,900 HP natural gas compressors (Case 1); however, it is possible that two smaller electric compressors would be installed at the Project Site (2,000 nominal HP) along with the two 1,900 HP natural gas compressors (Case 2). Case 1 is estimated to be approximately 4,368 metric tons per year of CO₂e and Case 2 is estimated to be approximately 5,397 metric tons per year of CO₂e. See PEA Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section (pages 5.8-8 through 5.8-14) and Response to PEA Completeness Review Section 5.8.4 (pages RTC-36 and RTC-37) and Appendix B, Air Quality and GHG Technical Report.
- b. As detailed in PEA Chapter 4, Description of Alternatives, under Section 4.2, Alternatives Eliminated from Further Consideration, under subheading 4.2.5, All-Electric Compression Alternative (pages 4-8 through 4-11), the all-electric compressor alternative was dismissed from further consideration. As such, this alternative was not analyzed further and the GHG emissions were not calculated.
- c. See response to question 47a. See Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section of the PEA (pages 5.8-8 through 5.8-14) and Section 5.8.4 (pages RTC-36 and RTC-37) and Appendix B, Air Quality and GHG Technical Report, in the Response to PEA Completeness Review.

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DATA REQUEST NO. 48:

You describe the State’s GHG emission reduction goals throughout the Application, including at Pages 67-68. You also assert on Page 68 that the “Proposed Project would not conflict with the State’s GHG reduction and carbon neutrality goals by modernizing the existing Ventura Compressor Station’s compression equipment and operating the proposed new electric driven compressors with a “first-on” and “last-off” protocol. And even assert that the Proposed Project actually “supports” the “State’s ability to achieve [its] 2030 and 2045 GHG reduction and carbon neutrality goals ...” Yet, You also state at Page 67 that “GHG emissions associated with the projected future operation of the Proposed Project are anticipated to be similar to those associated with the operation of the existing Ventura Compressor Station.”

- a. Please explain how the Proposed Project “would not conflict with the State’s GHG reduction and carbon neutrality goals”.
- b. Please explain how the Proposed Project “supports” the “State’s ability to achieve [its] 2030 and 2045 GHG reduction and carbon neutrality goals ...”.

RESPONSE 48:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous by quoting various sections of the Application, thereby creating a vague, compound, and argumentative set of requests. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The Project is not expected to conflict with the state’s GHG reduction and carbon neutrality goals as specified in the State’s Climate Change Scoping Plan. See PEA Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions, Impact 5.8b (pages 5.8-13 through 5.8-14) for further explanation.

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- b. By supporting the need for the project of “The critical importance of maintaining adequate inventory at the La Goleta Storage Field, which impacts reliability in the North Coastal System as well as the reliability of SoCalGas’s entire system, it supports the California Council on Science & Technology conclusion “Gas storage provides crucial hourly balancing for the gas system in all seasons. Without gas storage, California would be unable to accommodate the electricity generation ramping that now occurs nearly every day and that may increase as more renewables are added to the grid.” Available at: ccst.us/wp-content/uploads/Full-Technical-Report-v2_max.pdf The Proposed Project could support achieving carbon neutrality goals because it would help to bridge the transition to more renewable energy sources as they come online in future years. See PEA Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions, Impact 5.8b (pages 5.8-13 through 5.8-14) for further explanation.

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DATA REQUEST NO. 49:

Regarding Your “objectives of the Proposed Project” that You identify and list on Pages 75-76 of the Application.

- a. Your list of objectives does not include siting the Proposed Project outside of an ESJ Community. Why not?
- b. Your list of objectives does not include alignment with community preferences. Why not?
- c. Do You consider “NOx” to be a greenhouse gas?
- d. Your list of objectives does not include the reduction of GHGs. Why not?
- e. Your list of objectives includes “installing new compressors equipped with state- of-the-art emission control technology.” Could You add this emission control technology to the existing compressor facilities at the Ventura Compressor Station?

RESPONSE 49:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas considered certain alternative locations that meet the purpose and need of the project, some of which are located in an ESJ community. Thus, an objective for relocating the compressor station to one of the alternative site locations would not be enough of a

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differentiator of the Proposed Project and the Alternatives in the Application.

- b. SoCalGas has conducted extensive community outreach and meaningfully incorporated feedback as noted in the Application. Foundationally, the Proposed Project must meet the purpose and need of the project.
- c. See objections..
- d. GHGs are a global concern. The Proposed Project scope in terms of the type of equipment and the hybrid configuration is the same at each of the evaluated project locations. As such, the maximum GHG emissions would be the same regardless of location. Thus, an objective for reducing GHG emissions would not differentiate the Proposed Project and the alternatives in the Application.
- e. Yes, an equivalent emissions control technology can be applied to the existing compressor facilities.

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DATA REQUEST NO. 50: Regarding the non-pipeline alternative You entitled the “Gas End-Use Electrification Non- Pipeline Alternative” beginning at Page 77 of the Application.

- a. Please provide all Documents that discuss the decision to conduct a “high-level evaluation” of this alternative instead of an in-depth evaluation.
- b. On what basis did You conclude that this alternative “would need to fully eliminate the summer operating season gas end-use demand supported by the Ventura Compressor Station through end-use electrification”?
- c. What volumes of gas did You assume as the “gas end-use demand supported by the Ventura Compressor Station” when considering this alternative?
- d. What analyses were behind Your conclusion that this alternative requires “reduction of gas demand by converting over about 238,000 customers from gas to electric end uses”?
- e. Please provide all Documents related to the analyses You identified in response to Data Request No. 50, subpart “d”.
- f. Regarding Your response to Data Request No. 50, subpart “d,” did You consider a scenario in which less than 100 percent of those customers were converted from gas to electric end uses? If not, why not?
- g. On what basis did You conclude that this alternative requires not only “converting over about [sic] 238,000 customers from gas to electric end uses,” but also “increasing electric capacity and supply through installation of additional electric generation sources and infrastructure in the region that do not rely on natural gas provided by the Ventura Compressor Station”?
- h. At Page 78 of the Application, You state, referring to full electrification of the “summer season gas demand supported by the Ventura Compressor Station,” that “it is unlikely that this effort would be feasible to execute in a comparable timeframe as the Proposed Project, increasing the risks associated with deferring realization of the project objectives.”
 - i. In what timeframe could this be accomplished?
 - ii. Why does it matter whether this could be completed in a “comparable timeframe”?
 - iii. Considering Your statements in the Application at Page 8 that the Commission already “authorized prior versions of the Proposed Project,” please admit or deny that the deferred realization of the project objectives has been created or at least exacerbated by Your own failure to act in a timely manner.
- i. Identify the number of customers and their associated load You were referencing when You said in the Application at Page 78 that “some customers supplied by the North Coastal System use natural gas to generate electricity.”
- j. How do You “support efforts to decarbonize California’s integrated

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- energy system,” as You stated in the Application at Page 79.
- k. Have You, Sempra, or San Diego Gas & Electric Company (“SDG&E”) ever lobbied against California’s efforts to decarbonize?
 - l. On what grounds have You concluded that it is acceptable for You, a regulated utility, to not “continue to pursue the gas end-use electrification non-pipeline alternative to the Proposed Project,” which statement You made in the Application at Page 79.
 - m. Do You deny that the Commission should decide whether You should continue to pursue the gas end-use-electrification electrification non-pipeline alternative?

RESPONSE 50:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and given that it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “deferred realization of the project objectives”, and additionally the request to admit or deny a vague and compound statement in subsection h.iii. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the continuing nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge, including, but not limited to, the premise of subsection m. calling for SoCalGas to speculate about what the Commission “should” or should not do. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas

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responds as follows.

- a. No documents. Please see response to question 27.b.
- b. Please see discussion in application at page 76
- c. Please see discussion in application at page 76
- d. Please see discussion in application at page 76
- e. Two documents that are responsive to this question are protected under attorney-client privilege.
- f. As discussed in the Application on page 76, even at 100% electrification this non-pipeline alternative did not meet the project objectives. Partial electrification would only exacerbate this deficiency.
- g. SoCalGas assumed that these electrified gas end uses would continue to serve a purpose for customers and would therefore require incremental electric-side resources of some kind to operate. SoCalGas did not attempt to quantify this resource need, and our analysis dismissing electrification as an alternative did not rely on this – however, we do believe this would be a material, non-zero consideration for this alternative that would only add cost and challenge making the alternative less viable.
- h. See below.
 - i. SoCalGas has not estimated the time frame. It is currently not within SoCalGas' authority or ability to drive such an effort.
 - ii. Delays to the project can have an impact on reliability risk.
 - iii. SoCalGas interprets “deferred realization of the project objectives has been created or at least exacerbated by Your own failure to act in a timely manner” to mean that the objectives changed due to the time since the 2016 GRC.

The delay of the Proposed Project did not change the Proposed Project objectives.

The Ventura Compressor Modernization has undergone engineering scope changes which have resulted in schedule adjustments as documented in SoCalGas GRC testimonies prior to the filing of the CPCN. A summary of previous updates can be found in the Application starting on page 47. See Response 38.

- i. Please see the table in the application at page 76. SoCalGas objects to this request on the

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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.) In order to determine whether information was sufficiently aggregated to comply with applicable confidentiality laws, a 15/15 Rule analysis is 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 transport customer class data (Non-core, Enhanced Oil Recovery (EOR), and Electric Generation (EG)) is aggregated as there are less than 15 active EG or EOR customers.

- j. Reducing carbon intensity across all economic sectors is foundational to achieving California's net zero GHG emission goals. It requires energy efficiency, renewable electricity, renewable gases, long duration storage, carbon management, and other technologies to be viable at scale. A successful energy transition requires leadership, innovation, effective policy, and broad collaboration. SoCalGas supports efforts to decarbonize California's integrated gas and electric energy system through various means. Many of our efforts are outlined in the sustainability page of SoCalGas's website, found here: [Sustainability | SoCalGas](#)
- k. See objections.
- l. Please see response to Question 27.b.
- m. SoCalGas's has determined that this alternative is not viable to meet the objectives of the project based on a high-level evaluation.

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DATA REQUEST NO. 51:

Regarding the non-pipeline alternative You entitled the “Energy Efficiency Non-Pipeline Alternative” beginning at Page 77 of the Application.

- a. Please provide all Documents that discuss the decision to conduct a “high-level analysis” of this alternative instead of an in-depth evaluation.
- b. You state in the Application at Page 80 that You have experience implementing energy efficiency programs and have in fact “reduced over 1.2 million metric tons of carbon dioxide equivalent (MT CO₂e) and avoided \$1 billion in energy costs” from 2016-2020. Were these reductions required by statute or rule?
- c. You state in the Application at Page 80 that You expect “future customer participation in energy efficiency programs to remain similar to the historical average, absent a substantial change in customer behavior or the programs themselves.” Please produce all Documents that show that You considered attempting to change customer behavior or program design.
- d. Regarding Your observation in the Application at Page 80 of an “average 0.2% reduction in demand in the North Coastal System while utilizing currently available energy efficiency programs,” have You conducted any studies to assess the potential reduction in demand associated with the use of different or modified energy efficiency programs?
- e. If Your answer to Data Request No. 51, subpart “d” is “yes,” please describe the results of those studies and produce all Documents referenced.
- f. Regarding Your assertion at Page 80 of the Application that while “further incentives may reduce demand, it is not expected that they would eliminate customer demand altogether
 - i. What percentage of customer demand could be eliminated by further incentives?
 - ii. Please produce all Documents related to reduction in demand by further incentives.

RESPONSE 51:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due

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to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous because it refers to the incorrect page (77 rather than 79) of the Application for the quoted materials, and particularly with reference to the phrases “in-depth evaluation” in subsection a., “considered attempting to change customer behavior or program design” in subsection c., and “use of different or modified energy efficiency programs” in subsection d. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. No documents exist in response to this question.
- b. The CPUC provides authorization to SoCalGas to administer energy efficiency programs for its customers. The impacts referenced in the question above are a result of the successful implementation of SoCalGas’ energy efficiency programs in those years.
- c. SoCalGas did not conduct an additional analysis to alter consumer behavior through existing energy efficiency programs. Thus, no documents exist in response to this question.
- d. No
- e. Not Applicable
- f. See below.
 - i. SoCalGas has not conducted any additional analysis related to this matter, thus no documents exist in response to this question. Generally, SoCalGas’ experience in administering energy efficiency programs has shown that when incentives are increased, customer participation also increases. However, energy efficiency programs are designed to support customers efforts to use energy more efficiently, and do not provide solutions to avoid the usage of energy altogether.
 - ii. Not applicable.

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DATA REQUEST NO. 52:

Why did You consider the “Gas End-Use Electrification Non-Pipeline Alternative” and the “Energy Efficiency Non-Pipeline Alternative” as two separate, distinct alternatives instead of considering some combination of electrification and energy efficiency as an alternative to the Proposed Project?

RESPONSE 52:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “some combination of electrification and energy efficiency.” SoCalGas further objects to this request on the grounds it is argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

As discussed in the Application at page 76, demand side reductions combined with gas-use electrification fall far short of meeting project objectives. As such, it was determined that further detailed review or permutations of these solutions was not a prudent use of resources.

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DATA REQUEST NO. 53:

Regarding Your statement at Page 81 of the Application that You continue “to believe energy efficiency is a critical tool to lead the transition to a resilient and affordable decarbonized integrated energy system.”

- a. What studies have You undertaken to reach this belief?
- b. Have You undertaken any studies to consider how new innovative energy efficiency programs might better advance the goal of decarbonization?
- c. How do You define a “decarbonized integrated energy system”?
- d. Is “decarbonization” a term You created?
- e. Whose goal is it to “decarbonize the integrated energy system”?
- f. Are You aware that natural gas contains methane, a compound that contains carbon atoms?

RESPONSE 53:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). . SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. No. Please refer to the CPUC website where they discuss the importance and success of Energy Efficiency programs in California. <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency>
- b. No.

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- c. SoCalGas does not have an official definition but uses the phrase here to refer to the *interdependencies between the gas and electric systems to reach decarbonization goals*.
- d. No.
- e. The State's. An example of a California policy that addresses carbon neutrality is Executive Order B-55-18, which established a goal for California to reach carbon neutrality as soon as possible and no later than 2045.⁵

The state's goal is to achieve carbon neutrality by 2045. Also, but not limited to reference to AB 32, CARB's 2022 Scoping Plan, SB 350 energy efficiency measures, etc.

- f. Yes.

⁵ Executive Order B-55-18, signed by Governor Edmund G. Brown on September 10, 2018. For more information, see <https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>

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DATA REQUEST NO. 54:

Regarding the “Renewable Natural Gas Supply Non-Pipeline Alternative” You begin describing in the Application at Page 81, please describe Your “high-level analysis” and produce all Documents relating to this “high-level analysis.”

RESPONSE 54:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The high-level analysis is described on page 81. Two documents that are responsive to this question are protected under attorney-client privilege and are not being produced.

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DATA REQUEST NO. 55:

You state in the Application at Page 83 that You “do not believe RNG would be a viable option in the near term for purposes of serving customer demand in the North Coastal System to the extent it could eliminated the need for the Proposed Project.”

- a. What do You mean by “near term”?
- b. Please identify and produce the studies You undertook or reviewed that considered whether RNG would be a viable option in the “near term”.
- c. Could RNG reduce, if not eliminate, the need for the Proposed Project? For example, could RNG obviate what You believe to be the need to replace all the compressors?

RESPONSE 55:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas objects to this request on the grounds it is vague and ambiguous SoCalGas further objects to this request on the grounds it is compound, argumentative, and calls for speculation. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas meant near-term to represent a period for which can directly forecast availability with sufficient confidence to rely on these resources to maintain reliable service. Based on

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the information available today, as discussed in the Application, SoCalGas is unable to forecast local renewable gas supplies sufficiently meeting the project objectives. Several factors which could influence the future availability of renewable gas supplies, including hydrogen and synthetic renewable natural gas, are too uncertain to be incorporated in a “near-term” estimate to be relied on in the context of this Application.

- b. Please see discussion and citations in the Application starting on page 81. There was no specific study that SoCalGas undertook or reviewed for RNG supplies that could support/supplant the Proposed Project. Information regarding RNG projects is available on the Biomethane Monetary Incentive reservation list at <https://www.cpuc.ca.gov/industries-and-topics/natural-gas/renewable-gas>
- c. If RNG were to be available in sufficient volumes at the necessary times and locations to meet the project objectives, perhaps, RNG could meet some of the Proposed Project objectives. However, the lack of currently available and expected near term RNG would make this alternative far from reasonable. See Application page 82-84.

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DATA REQUEST NO. 56:

Regarding the “high-level analysis of using market mechanisms, via [Your] authorized rules, to eliminate the need for the Proposed Project”, as described in the Application at Pages 84-85.

- a. Please produce all Documents related to Your “high-level analysis.”
- b. Please explain what You mean by “via its authorized rules.”
- c. Please explain why You did not consider proposing new rules in addition to those already authorized.
- d. Regarding Your assertion at Application Page 85 that the “potential impacts of market mechanisms on energy infrastructure are currently undetermined,” please identify the actions You took to try and determine the potential impacts of market mechanisms on energy infrastructure.
- e. Regarding Your statement that “Reducing the working inventory at the La Goleta Storage Field ... could additionally negatively impact affordability,” please identify the basis for this claim, including any studies You conducted or caused to be conducted, and please produce those same studies.

RESPONSE 56:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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- a. If there is not incremental supply available within the defined market area available to customers, when market mechanisms are triggered the only options for customers are to pay the penalty or self-curtail or be curtailed . [Two documents that are responsive to this question are protected under attorney-client privilege and are not being produced.](#)
- b. Please see SoCalGas Tariff Rules 23, 30 and 41 for documents supporting high level analysis. Available at: [SoCalGas - Rules.](#)
- c. New rules would not increase local supplies that are currently available. As stated on Page 85 in the Application: “While market mechanisms are effective for balancing supply and demand on an intraday, daily, and monthly basis across the SoCalGas system, they do not incentivize an increase in local supply, which means they do not support long-term reliability needs, so SoCalGas does not intend to study this alternative further.”
- d. As stated on Page 85 in the Application: “This non-pipeline alternative was dismissed from further consideration because, if implemented, it would not eliminate the need for the Proposed Project, nor does it satisfy any of the objectives of the Proposed Project. Reducing the working inventory at the La Goleta Storage Field would do the opposite of what the Proposed Project seeks to do; it would jeopardize reliable service not only to the North Coastal System, but to the entire SoCalGas system and larger integrated energy system. Moreover, it could additionally negatively impact affordability. Adding an OFO rule for the North Coastal System would not be effective because there simply is not enough gas supply in the region to meet customer demand; thus, the Ventura Compressor Station would still be needed to serve demand. Finally, curtailments necessarily do not provide reliable service to all customers in the North Coastal System.”
- e. Reducing working storage inventory potentially increases the need for flowing supplies during periods of high demand when gas prices are higher.

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DATA REQUEST NO. 57:

Regarding the “All-Electric Compression Alternative” You describe in the Application beginning at Page 88.

- a. Why did You conduct a “high-level analysis” instead of a more thorough analysis?
- b. Please describe Your “high-level analysis” and produce all related Documents.
- c. Please provide all facts supporting Your conclusion in the Application at Page 88 that this alternative would require “a new on-site substation” and produce all related Documents.
- d. Please provide all facts supporting Your conclusion in the Application at Page 88 that this alternative would require “an additional acre of space beyond the eight acres SoCalGas owns at the site of the existing compressor station.”
- e. Please identify all actions You took to determine whether You could acquire an additional acre of space at the existing compressor station site.
- f. Did You consider completing this All-Electric Compression Alternative at another location, such as the Road Site?
- g. Please identify all electrical outages You have experienced at the existing Ventura Compressor Station within the previous 10 years and for each outage provide the duration of that outage.
- h. Regarding Your assertion in the Application at Page 88 that “incorporating BESS could only provide supplemental power sufficient for administrative needs (e.g., the office building), not the compressors[,],” please produce the studies or reports on which You base this conclusion.
- i. Footnote 55 at Application Page 88 states that the length of time a battery energy storage system (“BESS”) could supply power would likely be “between 3 and 5 days at most.” On what basis did You determine that 3 to 5 days of backup power was insufficient?
- j. How many days up backup power do You consider sufficient to support an all-electric compressor alternative?
- k. Regarding Your statement at Page 90 of the Application that the “required onsite substation for this alternative would displace the infrastructure required to build the new facility and therefore is an infeasible option[,],” would the required onsite substation make an all-electric compression alternative an “infeasible option” if You selected a different location for the Proposed Project that had a footprint large enough to accommodate the onsite substation, such as the Road Site?
- l. Regarding Your other option for standby generation described at Page 90 of the Application that includes “a combination of an electrical substation ... and the natural gas engine solution for back-up power.”

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- i. Is installing an electrical substation a component of the Proposed Project?
- ii. Is installing an electrical substation a necessary component of the Proposed Project and, if so, why?
- iii. You mention as an option to meet the power requirement the “installation of a 10 MW gas turbine power generator package outfit.” Would installing a 10 MW gas turbine power generator package outfit obviate the need for a substation?
- iv. Could the installation of 10 MW of solar or wind instead of a 10 MW gas turbine power generator package outfit be an option to meet the power requirement?
- v. You state at Page 90 that “an onsite stepdown, oil-filled transformer would also be required[]”. Could You use a natural ester fluid derived from renewable vegetable oils, such as Cargill’s FR3 dielectric fluid, instead of mineral oil to fill the transformer?
- m. You state in the Application at Page 90 that the “additional plot space required for this option in the configuration explained above will not fit within the existing 8- acre site.” Did You consider eliminating the proposed 4,641-sf permanent office building “for support staff” that You have identified as part of the scope of the Proposed Project (*e.g.*, at Application Page 26)?
- n. Did You consider constructing a single two-story building with a warehouse on one floor and office space on the other? If not, why not?
- o. What actions did You take, if any, to investigate whether You could purchase or lease additional land adjacent to the existing Ventura Compressor Station?
- p. Please provide a list of all electrical outages, including the start and end times of the outages, at the Ventura Compressor Station for the previous 10 years.
- q. Please provide a list of all electrical outages attributable to SCE Public Safety Power Shutoffs (“PSPS”) at the Ventura Compressor Station for the previous 10 years.
- r. Please identify the average outage time at the Ventura Compressor Station associated with all PSPS events that SCE implemented for the previous 10 years.
- s. How do You define an “extended PSPS event,” which You reference in the Application at Page 91.
- t. Identify the basis for Your assertion that “neither on-site solar nor battery solutions can compensate for an extended PSPS event.”
- u. Please provide all communications You have had with SCE regarding the “All-Electric Compression Alternative” You describe in the Application beginning at Page 88.

RESPONSE 57:

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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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas's knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas conducted a high-level desktop analysis because after this analysis, SoCalGas determined that an all electric alternative would not meet the purpose and need of the project. See March 2022 Feasibility Study Work Cited. Publicly available at: [Ventura Compressor Modernization Project | SoCalGas](#).
- b. An electric motor study was completed by SoCalGas engineering consultant in October of 2021 to develop conceptual layouts for hybrid and all-electric configurations and preliminary cost estimates. In July 2023, SoCalGas estimated the size of a gas turbine package and auxiliaries needed to serve as a backup power option for the All-Electric Compression alternative. SoCalGas used plot plans and equipment brochures found online to estimate plot space needed for this back-up power solution. In July 2023, a SoCalGas engineering consultant performed a backup study analysis using redundant electrical feeds from Southern California Edison. The engineering consultant was contracted to research what neighboring SCE stations could support the proposed load for the all-electric

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compression alternative, draft potential transmission line routes for each station, draft preliminary single line diagrams and plot plans for a substation on site. See non-privileged attachments, note, attachments have been redacted to protect the privacy of SoCalGas employees and contractors and to remove attorney client privilege information label. .

Attachments:

- VCM_A2308019_CoV_SCG_02_Q57_Attach_01_BackupPowerDocs
- VCM_A2308019_CoV_SCG_02_Q57_Attach_02_EleMotorAnalysis
- VCM_A2308019_CoV_SCG_02_Q57_Attach_03_IGPTechDesc
- VCM_A2308019_CoV_SCG_02_Q57_Attach_04_Spirit12Tech
- VCM_A2308019_CoV_SCG_02_Q57_Attach_05_GasTurbineGen

- c. See Response 57b and March 2022 Feasibility Study Work Cited. Publicly available at: [Ventura Compressor Modernization Project | SoCalGas](#)
- d. The statement was made based on consultation with SoCalGas engineering consultant. Reference Backup Power Study information provided in 57b. Backup power study plot space areas is approximately 210’x190’ plus fire department access yields about an acre. Additionally see response to CAUSE-SCG-03 Question 1a for conceptual plot plan. Available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)
- e. None. The all-electric alternative was dismissed therefore no action to acquire additional acreage at the existing site was pursued.
- f. No.
- g. See table below identifying all electrical outages experienced at the existing Ventura Compressor Station within the previous 10 years.

Date	Duration (hours)
12/31/2022	0.5
3/10/2022	2.6
10/21/2021	0.1
2/8/2021	0.5
1/19/2021	13.2
9/5/2020	2.5
9/25/2019	1.5
9/24/2019	2

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Date	Duration (hours)
6/7/2019	0.3
4/19/2019	0.5
12/15/2018	0.6
11/29/2018	1
2/28/2018	0.3
12/6/2017	4
12/5/2017	5.1
11/24/2017	1.7
2/28/2017	0.3
1/22/2017	0.1
11/6/2016	0.8
10/16/2016	0.2
7/14/2016	0.1
12/2/2015	0.2
11/16/2015	2.1
10/13/2015	1.2
10/9/2015	11.6
9/15/2015	0.4
6/11/2015	0.2
4/7/2015	0.2
6/27/2014	0.5
4/10/2014	1.6
3/2/2014	0.3

- h. See March 2022 Feasibility Study Work Cited. Publicly available at: [Ventura Compressor Modernization Project | SoCalGas](#)
- i. See March 2022 Feasibility Study Work Cited. Publicly available at: [Ventura Compressor Modernization Project | SoCalGas](#)
- j. As described on page 32 of CPCN “the La Goleta Storage Field is required to be shut in to undergo inventory verification twice each year, for approximately 7 days each. Thus, for two weeks each year, the North Coastal System is completely dependent on the concurrent availability of the Ventura Compressor Station.” Additionally, wildfire and PSPS events pose an ever-present threat to the area and therefore would need to be factored in. Battery storage would need to be designed to meet all-electric load for a minimum of 7 days.

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- k. The Road Site alternative was considered using the hybrid configuration therefore this analysis has not been conducted.
- l. See below.
- i. No.
 - ii. No, as stated in the PEA page 3-5, a modified electric interconnection is planned, which is a component of the project.
 - iii. No. See CAUSE Data Request 3 Question Response 1 with plot plan attachment. Available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)
 - iv. Installing 10 MW of wind or solar onsite is not feasible. Most wind turbines range in height from 80 to 120 meters with a rotor sweep of about 130 meters.⁶ A utility-scale solar power plant may require between 5 and 10 acres per megawatt (MW) of generating capacity.⁷
 - v. Unknown. The type of oil used in electric transformers would be evaluated during detailed design.
- m. No.
- n. No, at the time this was not an operational preference.
- o. No action was taken to purchase or lease additional land adjacent to the existing Ventura Compressor Station for operational use. See 57 e.
- p. See 57g. Start and end times are not available.
- q. Based on available station data, SoCalGas has observed a loss in electric service due to PSPS events as follows:
- January 19, 2021: 13.2 hours
 - December 6, 2017: 4 hours

⁶ [Wind Turbines: the Bigger, the Better | Department of Energy](#). Accessed January 24, 2024.

⁷ [Utility Scale Solar Power. seia.org](#). Accessed January 24, 2024.

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- December 5, 2017: 5.1 hours⁸
- r. 7.4 hours
- s. PSPS events are triggered by extreme weather or wildfire conditions, which may span over a small or large area and last for an extended period of time. An extended PSPS event therefore may not be limited only to duration but also to location and extent of area affected. SoCalGas notes that power loss may also occur from wildfire damage to power lines, which when damaged may take hours, days or weeks to repair. Ventura County Fire Dept PSPS Guidance explains preparation for 3-5 days. [SCE Public Safety Power Shutoff \(PSPS\) & Cooling Centers – Ventura County Fire Department \(vcfd.org\)](https://www.vcfd.org/psps-cooling-centers)
- t. A battery energy storage system (BESS) could offer onsite generation capabilities. A BESS could be incorporated for supplemental power for administrative needs (e.g., office building) and potentially to provide supplemental power to electric compressors in the event of a power failure. However, “most large-scale batteries currently use lithium-ion technology, and can discharge for about four hours at most.”⁹ The length of time that a BESS could supply power would be contingent on the size and capacity of the BESS, likely between 3 to 5 days at most.
- u. See non-privileged attachment between SoCalGas’s engineering consultant and SCE. Note, attachment have been redacted for to protect the privacy of SoCalGas employees and contractors.
- Attachment: VCM_A2308019_CoV_SCV_02_Q57_Attach_06_20210825Email

⁸ SoCalGas experienced a power loss on December 5, 2017 and December 6, 2017, which occurred during the Thomas Fire. Resolution ESRB-8 was adopted on July 12, 2018, and established standards for reasonableness, notification, mitigation, and reporting by investor owned utilities other than San Diego Gas & Electric. Since specific reporting for PSPS events was not available at the time, SoCalGas infers that the loss of power was due to a PSPS, however, note that the power loss also could have been caused by the destruction of a power line.

⁹ America’s Power Grid is Increasingly Unreliable.” Wall Street Journal. February 18, 2022. Accessed online February 18, 2022: <https://www.wsj.com/articles/americas-power-grid-is-increasingly-unreliable-11645196772>.

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DATA REQUEST NO. 58:

Regarding Table 4 – Comparison of Proposed Project and Dismissed Alternatives to Project Objectives at Page 94 of the Application, please identify each of the eight objectives referenced in Table 4 by number.

RESPONSE 58:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is contained in the Application and thus, publicly and readily available. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

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DATA REQUEST NO. 59:

Regarding Your description of the Proposed Project beginning at Page 95 of the Application.

- a. What do You mean when You reference the “two new electric compressors with zero local emissions that provide additional horsepower[]” (emphasis added)?
- b. Do You plan to use the two new electric compressors to provide the “additional horsepower” only when the horsepower of the gas compressors is insufficient to safely operate the compressor station?
- c. You state at Application Page 46 Your intent to “prioritize the new electric compressors as ‘first on’ and ‘last off’ during normal operations of the facility. Please:
 - i. Define “normal operations” and
 - ii. State the circumstances under which the gas compressors would be utilized.
- d. Have You determined whether Your plan to install a new 8-foot-tall perimeter block wall is permitted by applicable local code?

RESPONSE 59:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and

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no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The project proposes adding two new electric-motor-driven compressors that are rated at 2,500 nominal HP (estimated horsepower) each. Impacts of criteria pollutant emissions are analyzed within the local area or air basin, in this case within Ventura County. The two new electric compressors will have zero criteria pollutant emissions.
- b. No. Please refer to Response 37a and 59c..
- c. See below.
 - i. Normal operations is defined as the conditions under which all compressor units are operationally available and station power feed is available. Operations and maintenance activities such as compliance testing, planned or unplanned maintenance are considered outside “normal operations”.
 - ii. The intention is to run the gas compressors only if the electric compressors are down for maintenance or if the demand is higher than the combined capacity of the electric compressors.
- d. Yes.

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DATA REQUEST NO. 60:

The Application at Page 113 says that the “cost estimate for the Proposed Project is at Class 3— further developed than for the other alternatives because [You] could utilize some of the previous Front-End Engineering Design (FEED) information that was developed for a prior iteration of the project after it was authorized by the Commission[.]”, whereas “estimates for all other alternatives have been developed based on preliminary site consideration and construction assumptions, and thus are considered Class 5 estimates with a broader range of accuracy.”

- A. Please explain why You could not use “previous Front-End Engineering Design (FEED) information” for the Road Site.

RESPONSE 60:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous due, in part, to the incomplete and argumentative hypothetical underlying the premise of the request. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The project maturity for the alternative sites is 0-2% complete. Engineering components within Front End Engineering Design such as site survey and geotechnical studies are location specific and have not been conducted at the alternative sites.

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DATA REQUEST NO. 61:

Regarding Table 6 – Proposed Project and Project Alternatives Cost and In-Service Date Comparison at Application Page 114.

- a. Please explain why the Road Site is more expensive (\$896 million compared to \$578 million) than the Proposed Project.
- b. Do You agree that Table 6 indicates that the Proposed Project could cost \$578 million?
- c. Do You agree that Table 6 indicates that the Road Site could cost \$896 million?
- d. Please produce all Documents relating to the total project cost estimates You included in Table 6.

RESPONSE 61:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents relating” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. There are site-specific characteristics which drive the higher cost for this alternative’s assumed additional sitework, piling, extension of natural gas transmission pipelines and anticipated soil remediation required at the site. Beyond the site-specific characteristics,

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the overall schedule for this alternative extends due to the new land acquisition required. The additional project duration will impact overall costs including company labor required and the overall escalation of all project related costs.

- b. Yes. This estimate is based on a schedule with an in service date of April 2032.
- c. Yes. This estimate is based on a schedule with an in-service date of June 2036. Yes, see table 6 of the application.
- d. See non-privileged attachments.

Note, attachments have been redacted for to protect the privacy of SoCalGas employees and contractors, in accordance with contractor agreements, and to remove attorney client privilege information labels.

Attachments:

- VCM_A2308019_CoV_SCG_02_Q61_Attach_01_Estimates
- VCM_A2308019_CoV_SCG_02_Q61_Attach_02_SuppDocsEst
- VCM_A2308019_CoV_SCG_02_Q61_Attach_03_OpsCost
- VCM_A2308019_CoV_SCG_02_Q61_Attach_04_ModelReview.nwd

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DATA REQUEST NO. 62:

You state in the Application at Page 116 that a “four gas-compressor-configuration ... was authorized in [Your] 2019 GRC.”

- a. Aside from the Footnote 28 citation You included at Page 49 of the Application, please identify the basis for Your assertion that the Commission “authorized” the “four gas-compressor-configuration.”
- b. Please produce all Documents related to Your assertion that a “four gas-compressor configuration” was authorized in Your 2019 GRC.
- c. Please explain why You did not construct the “four gas-compressor configuration” promptly after the alleged authorization.

RESPONSE 62:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “promptly after the alleged authorization.” SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See Response 24.

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- b. See Response 24.
- c. See Response 39.

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DATA REQUEST NO. 63:

Regarding Your assertion in the Application at Page 116 that “in August 2021, the Commission requested that SoCalGas halt engineering activities, conduct stakeholder outreach, and prepare a feasibility study to evaluate alternative compressor equipment configurations and alternative site locations for the planned project.”

- a. Please identify the date on which the Commission made this request and produce all Documents relating to this request, including Documents prior to August 2021.
- b. If the Commission told You why it was making this request, please identify the reason the Commission gave You for making this request.

RESPONSE 63:

SoCalGas objects to the request as being duplicative of Data Request No. 40, above, and as such, this request is unduly burdensome as well as being not relevant and overly broad 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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge, including, but not limited to, speculation as to the Commission’s reasons for taking certain actions. SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all Documents relating to this request” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Refer to Response 40c.

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b. Refer to Response 40b.

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DATA REQUEST NO. 64:

Regarding Your statement in the Application at Page 117 that the “Proposed Project includes installing an emergency/standby gas engine generator with enclosure to provide back-up power to run the gas compressors during a power outage,” please explain whether You could use an emergency/standby gas engine generator to provide back-up power to run the all-electric compressors during a power outage if You were to construct the “All-Electric Compression Alternative” You describe in the Application beginning at Page 88. If not, why not?

RESPONSE 64:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous because it is premised upon an incomplete and argumentative hypothetical. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Utilization of gas engine generators similar to those in the Proposed Project to provide backup power for the all-electric alternative is impractical as it would require approximately 17 generators to meet the power demand. As described on page 90 of the Application, a gas engine turbine package application was conceptually analyzed however due to the limited plot space it was deemed infeasible.

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DATA REQUEST NO. 65:

Regarding the “accompanying Prepared Direct Testimony of Sakif Wasif” that You reference in the Application at Page 121, please produce this testimony.

RESPONSE 65:

SoCalGas objects to this request on the grounds that the information sought is publicly available, and thus equally available to the requesting entity. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)

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DATA REQUEST NO. 66:

Is one strategy for keeping Your rates low keeping the Ventura Compressor Station sited in an ESJ Community?

RESPONSE 66:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous with reference to the phrase “strategy for keeping Your rates low” and because the request is premised on an incomplete and argumentative hypothetical. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

No.

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DATA REQUEST NO. 67:

The Application at Page 125 says that You are “experienced in designing and managing major gas construction projects rigorous controls, including for cost.”

- a. Please identify all “major gas construction projects” within the previous 10 years that You are referring to here.
- b. For each project identified in response to Data Request No. 65 [sic][7], subpart “a,” please provide the estimated cost and the final cost.

RESPONSE 67:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, due to its request for information dating back 10 years. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas defines major gas construction projects as projects exceeding \$50 million in cost. See below for a list of major gas construction projects from 2012- 2023.

Project Name¹	Completion Date	Estimated Cost² (\$MM)	Capital Expenditure (\$MM)¹
Blythe Compressor Modernization	October 2021	\$335MM	\$338.7MM
Aliso Canyon Turbine Replacement	May 2018	\$275.4MM	\$297.1MM
Line 3000 Transmission Integrity Management Program (TIMP) Replacement	November 2021	\$174.7MM	\$161.4MM
Pipeline Safety Enhancement Plan (PSEP) – Supply Line 45-120	December 2017	\$85.0MM	\$92.0MM
PSEP – Line 6914	May 2016	\$89.2MM	\$84.9MM
Line 235W Replacement	June 2021	\$99.9MM	\$75.2MM
Honor Rancho Inventory Expansion	October 2015	\$61.7MM	\$59.6MM

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Project Name¹	Completion Date	Estimated Cost² (\$MM)	Capital Expenditure (\$MM)¹
Line 6916	December 2012	\$55.5MM	\$58.1MM
PSEP – SL 36-9-09	July 2016	\$51.4MM	\$53.9MM
PSEP – SL 37-18 Replacement	April 2017	\$47.1MM	\$50.4MM
Line 4000 TIMP Remediation	October 2021	\$65.3MM	\$54.7MM
¹ Capital Expenditure values shown in the table are fully loaded.			
² Fully Loaded Work Order Authorization estimate.			

b. See Response 67a.

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DATA REQUEST NO. 68:

In the Application at Page 132 YOU state that YOU have “undertaken a robust outreach plan to pursue social equity and inclusivity ...”

- a. Please explain how keeping the existing Ventura Compressor Station sited in an ESJ aligns with Your alleged plan to “pursue social equity and inclusivity.”

RESPONSE 68:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas further objects to this request on the grounds it is argumentative and asks a question that is not a reasonable interpretation of the quoted phrase. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. 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 stated in the application, SoCalGas has undertaken a robust outreach plan to pursue social equity and inclusivity, particularly in the community around the Ventura Compressor Station, which has provided local stakeholders with meaningful opportunities for engagement, consistent with ESJ Goals 1 and 5. Goal 1 is *Consistently integrate equity and access considerations throughout CPUC regulatory activities*. Goal 5 is *Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC’s decision-making process and benefit from CPUC programs*. As explained in the application, through the regulatory process, engagement with the community, and outreach to the community, residents are able to participate in this process with the CPUC and provide meaningful input for the CPUC to evaluate the project. The CPUC is the ultimate decisionmaker and will take into account community input and SoCalGas ratepayer impacts when considering the project and alternatives.

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DATA REQUEST NO. 69:

You assert in the Application at Page 132 that safety is “paramount at SoCalGas.” Websters defines “paramount” as “superior to all others” and Oxford Languages defines “paramount” as “more important than anything else; supreme.”

- a. Please confirm that You prioritize safety above everything else.
- b. If You do not define “paramount” as “superior to all others” or “more important than anything else,” please explain what You mean by “paramount” when You say in the Application at Page 132 that “safety is paramount at SoCalGas.”

RESPONSE 69:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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- a. Yes. As reflected in SoCalGas's Safety Plan, SoCalGas has designed its Gas Safety Plan to among other things to implement the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority.
- b. Not applicable.

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DATA REQUEST NO. 70:

The Application at Pages 132-33 addresses “ESJ Goal 1 – Integrate equity and access to CPUC activities and decision-making that will impact the residents of the ESJ community.” Please identify and describe with specificity all actions You have taken to “integrate equity and access to CPUC activities and decision-making that will impact the residents of the ESJ community” in which the Ventura Compressor Station is currently located.

RESPONSE 70:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See Appendix G of the PEA and Response 21a.

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DATA REQUEST NO. 71:

You state in the Application at Page 133 that You “prepared a feasibility study to evaluate alternative site locations and equipment configurations at the existing compressor station.”

- a. Please identify this “feasibility study” by name, date, and author.
- b. Please produce a copy of this study, including any amended or revised versions.

RESPONSE 71:

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 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Feasibility Study of Potential Alternatives Ventura Compressor Station Modernization Project. March 2022. Prepared by SoCalGas with Technical Input from Dudek, Burns & McDonnell and SPEC Services.
- b. See SoCalGas website: [Ventura Compressor Modernization Project | SoCalGas](#)

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DATA REQUEST NO. 72:

Regarding Footnote 82 at Application Page 134, which states in part that “SoCalGas is committed to improve air quality. More than one-third of SoCalGas’ fleet vehicles are running on clean fuel, and two of our largest facilities are powered with fuel cells.”

- a. Please identify the date on which SoCalGas committed to improving air quality and confirm whether this date occurred prior to or after the Aliso Canyon leak.
- b. Please define “clean fuel” in the context of Your assertion that “[m]ore than one- third of SoCalGas’ fleet vehicles are running on clean fuel[.]”

RESPONSE 72:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “the date on which SoCalGas committed to improving air quality.” SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. The referenced statement on page 134 in its complete form is as follows: “One of SoCalGas’s sustainability strategy prioritization areas is protecting the climate and improving local air quality.” This statement is referenced in SoCalGas’s Sustainability Strategy document that was published in January 2022. The Aliso Canyon incident occurred in October 2015- February 2016.
- b. More than one third of SoCalGas’ over-the-road fleet use alternative fuel vehicles, which include electric, hybrid, renewable gas, and fuel cell electric vehicles. Clean fuels may

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include alternative fuels such as hydrogen, biogas, synthetic natural gas, biofuels, and synthetic gaseous and liquid fuels.

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DATA REQUEST NO. 73:

The Application at Page 135 says that “With the operation of the electric units on a first- on and last-off basis, the Proposed Project is anticipated to reduce direct GHG emissions from the gas compressors.” (emphasis added)

- a. Please quantify the anticipated reduction by providing the current annual direct GHG emissions from the gas compressor and the anticipated annual direct GHG emissions from the gas compressors if the Proposed Project is built.
- b. Please explain what You mean by “direct GHG emissions”.

RESPONSE 73:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See response to request 47a and refer to Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section of the PEA (pages 5.8-8 through 5.8-14) and Section 5.8.4 (pages RTC-36 and RTC-37) and Appendix B, Air Quality and GHG Technical Report, in the Response to PEA Completeness Review.
- b. Direct GHG emissions are those actually emitted by Project construction and operation, while indirect GHG emissions are those associated with the purchase of electricity, heating, etc. See Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section of the PEA (pages 5.8-8 through 5.8-14) and Section 5.8.4 (pages RTC-36 and RTC-37) and Appendix B, Air Quality and GHG Technical Report, in the Response to PEA Completeness Review

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DATA REQUEST NO. 74:

On Page 67 of the Application You state that “GHG emissions associated with the proposed future operation of the Proposed Project are anticipated to be similar to those associated with the operation of the existing Ventura Compressor Station.”

- a. Please confirm whether the Proposed Project would reduce GHG emissions compared to the existing Ventura Compressor Station.
- b. Please explain what You mean by “similar” by providing the annual GHG emissions from Your operation of the existing Ventura Compressor Station and the anticipated annual GHG emissions from Your operation of the Proposed Project, if constructed.

RESPONSE 74:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly because subsection a. requests confirmation of a sentence from the Application while mischaracterizing that same sentence. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See Response 47a and see Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section of the PEA under Impact 5.8a (pages 5.8-8 through 5.8-13) and Section 5.8 (RTC-36 and RTC-37) and Appendix B,, Air Quality and GHG Technical Report, in the Response to PEA Completeness Review.
- b. See Response 47a and see Section 5.8.4, Impact Analysis of the Greenhouse Gas Emissions Section of the PEA under Impact 5.8a (pages 5.8-8 through 5.8-13) and Section 5.8 (RTC-36 and RTC-37) and Appendix B, Air Quality and GHG Technical Report, in the Response to PEA Completeness Review.

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DATA REQUEST NO. 75:

The Application at Page 135 says the “Proposed Project is thus consistent with an increased investment in clean energy resources.”

- a. Please provide Your definition of “clean energy resources” in this context.
- b. Please explain why You have defined “clean energy resources” as provided in Your response to Data Request No. 75, subpart “a”.

RESPONSE 75:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas objects to this request on the grounds it is vague and ambiguous. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). With respect to the definition of “You” and “Your,” SoCalGas objects that application of that definition to this request makes the request unintelligible and overbroad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. In this context, the term “clean energy resources” references Environmental and Social Justice (ESJ) Goal 2 from the CPUC’s ESJ action plan.¹⁰ The proposed project is anticipated to reduce direct GHG emissions from the gas compressors.
- b. The definition of clean energy resources was defined to be similar to the State of California’s definition of clean energy resources.

¹⁰ 2022-04, CPUC, “Environmental & Social Justice Action Plan”, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>

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DATA REQUEST NO. 76:

The Application at Page 136 says Your “mission is to build the cleanest, safest, and most innovative energy infrastructure company in America.”

- a. Please provide Your mission statement or other Document in which You have memorialized this “mission”.
- b. How do You measure Your performance against Your “mission [] to build the cleanest, safest, and most innovative energy infrastructure company in America”?
- c. Are You proposing to build a hydrogen gas system?

RESPONSE 76:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas also objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas further objects to this request on the grounds it is compound and argumentative. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. See [Our Mission | SoCalGas](#)
- b. See Response to 18c – 18h.
- c. This Application does not propose to build a hydrogen gas system.

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DATA REQUEST NO. 77:

The Application at Page 144 says that “Third-party inspections from regulatory agencies are also anticipated to provide additional safety oversight.”

- a. Please identify the “regulatory agencies” to which You are referring here.
- b. Please identify the anticipated “third-party inspections” You are anticipating.
- c. Please explain the basis anticipating these “third-party inspections.”

RESPONSE 77:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to this request on the grounds that it calls for speculation regarding facts that are not within SoCalGas’s knowledge. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas may be subject to inspections including but not limited to the following agencies: CPUC; OSHA; Cal/OSHA; Department of Toxic Substance Control (oversight of any Removal Action Workplan); Ventura County Fire Department (the certified unified program agency [CUPA]); Ventura County Air Pollution Control District; Ventura City Fire Department; Ventura City Building & Safety Division
- b. Routine inspections from the agencies noted in 77a.
- c. Routine inspections for compliance with regulatory requirements.

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DATA REQUEST NO. 78:

The Application at Page 145 says that You have “safely and reliably operated the Ventura Compressor Station for many years.”

- a. Please define “many years”.
- b. As to those years identified in Your response to Data Request No. 78, subpart “a”, please identify and provide relevant information on every blowdown, identified danger or safety risk, OSHA recordable, fires, leaks, or other safety risk that occurred or that You identified during those “many years”.
- c. Please confirm whether You track the safety incident rate, or similar, of each of Your compressor stations.
- d. To the extent You track a safety incident rate or similar at Your compressor stations, please provide data sufficient to compare the safety incident rate at the Ventura compressor station in comparison to Your other compressor stations.

RESPONSE 78:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas objects to this request on the grounds it is vague and ambiguous. 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. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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- a. The station was originally constructed in 1923 and the “many years” stated in the Application meant 101 years.
- b. See Data Request CAUSE- SCG-01 Supplement 1 Question 1, Data Request CAUSE-SCG-02 Question 13, Data Request City of Ventura-SCG-01 Question 8 and Question 10d. Available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)
- c. Yes. See City of Ventura-SCG-01 Question 8a. Available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)
- d. See City of Ventura-SCG-01 Data Request Question 8a.

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DATA REQUEST NO. 79:

The Application at Page 145 says that Your “senior public affairs manager has been in contact with the City of Ventura regularly via phone, email, and virtual meetings about the Proposed Project and other issues since 2019.”

- a. Please explain what You mean by and identify all “other issues.”
- b. Please explain what You mean by “in contact with”.
- c. Please identify, summarize, and produce all communications and Documents purporting to contain communications between You and the City of Ventura, including any agents of the City of Ventura (*e.g.*, legal counsel).
- d. Please identify all persons at the City of Ventura with whom You communicated.

RESPONSE 79:

SoCalGas objects to this request as being duplicative of Data Request No. 1 and therefore unduly burdensome and harassing in addition to being not relevant and overly broad 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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling, and to the extent it fails to identify a relevant time period. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. 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, namely the information sought in subsections a., c., and d., is equally available to and within the custody and control of the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines will be knowingly disclosed. SoCalGas objects to the request for “all communications” and “all Documents” and “all persons” and “all ‘other issues’” as overbroad and unduly burdensome. SoCalGas will produce documents sufficient to respond to the request. Subject to and without

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waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas has been in contact with the City of Ventura regarding including but not limited to the following: pipeline repairs within the City, pipeline projects within the City, soil remediation at the Ventura Compressor Station, Ventura Compressor Station blowdown, Ventura Compressor Station leak repair, Ventura Compressor Station methane monitors, Ventura Compressor Modernization project, and emergency response at the Ventura Compressor Station.
- b. Senior public affairs manager has communicated to the City of Ventura regularly via phone, email, and virtual meetings about the Proposed Project and other issues since 2019. See response 79a for other issues.
- c. Please see appendix G. Which contains communications until July 12, 2023. Thereafter, numerous additional communications occurred including;
 - 8/17/2023, emailed a project newsletter,
 - 8/24/2023, via email informed city that the CPCN application was filed.
 - 9/11/2023, emailed city and informed them that the soil remediation work was completed at the compressor station. Mayor responded, thanking SoCalGas for the update.
 - 11/30/2023 emailed city a project newsletter.
 - 12/18/2023 emailed City Manager regarding leak repair.

See non-privileged attachments. Note, attachments have been redacted for to protect the privacy of SoCalGas employees.

Attachments:

- VCM_A2308019_CoV_SCG_02_Q79_Attach_01_20230818
 - VCM_A2308019_CoV_SCG_02_Q79_Attach_02_20230824
 - VCM_A2308019_CoV_SCG_02_Q79_Attach_03_20230915
 - VCM_A2308019_CoV_SCG_02_Q79_Attach_04_20231130
 - VCM_A2308019_CoV_SCG_02_Q79_Attach_05_20231218
- d. SoCalGas communicates with various city officials depending on the topic. Specific to the compressor station modernization project, the following city officials were provided updates. Note some individuals may have been hired or retired or are no longer with the

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city, so not every individual below may not have received every update but including for historical reference.

Organization	Title	First Name	Last Name
City of Ventura	City Manager	Bill	Ayub
City of Ventura	Interim Assistant City Manager	Brad "Brick"	Connors
City of Ventura	Assistant City Manager	Akbar	Alikhan
City of Ventura	Hired by City outside counsel	Howard	Goloub
City of Ventura	City Attorney	Andy	Heglund
City of Ventura	Public Information Officer	Heather	Sumagaysay
City of Ventura	Community Development Director	Neda	Zayer
City of Ventura	Chief Building Official	Shawn	Huff
City of Ventura	Public Works Director	Phil	Nelson
City of Ventura	Emergency Manager	Mack	Douglass
City of Ventura	Mayor	Joe	Schroeder
City of Ventura	Deputy Mayor	Jeannette	Sanchez-Palacios
City of Ventura	Councilmember	Jim	Duran
City of Ventura	Councilmember	Bill	McReynolds
City of Ventura	Councilmember	Doug	Halter
City of Ventura	Councilmember	Mike	Johnson
City of Ventura	Councilmember	Liz	Campos
City of Ventura	Senior Building Inspector	Tim	Fiske
Ventura City Fire	Fire Chief	David	Endaya
Housing Authority of the City of San Buenaventura	Policy and Community Affairs Manager	Ricardo	Torres
Housing Authority of the City of San Buenaventura	Chief Executive Officer	Jeffrey	Lambert
Housing Authority of the City of San Buenaventura	Resident Services Coordinator	Maria	Martinez
Ventura City Fire	Battalion Chief	Matt	Brock

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DATA REQUEST NO. 80:

You state in the Application at Page 148 that You “conducted extensive stakeholder outreach about the Proposed Project and [have] incorporated certain feedback.”

- a. Please identify all feedback You received about the Proposed Project as a result of Your alleged “extensive stakeholder outreach”
- b. Please produce all Documents containing all feedback You have received as a result of Your alleged “extensive stakeholder outreach.”
- c. Please identify and describe all feedback You received as a result of Your alleged “extensive stakeholder outreach” that You did not incorporate. Please identify the person or entity that provided this feedback that You did not incorporate.
- d. Please produce all Documents concerning the Proposed Project sent to and received from Commission staff since the *Assigned Commissioner’s Scoping Memo and Ruling* was issued on or about October 3, 2022, in proceeding A.22- 05-016.

RESPONSE 80:

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 objects that this request is overly broad and unduly burdensome at this stage of the proceeding, prior to issuance of a scoping ruling. SoCalGas further objects on the grounds that this request is designed to harass SoCalGas and constitutes an unwarranted annoyance due to the request being an undue burden. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with reference to the phrase “all Documents containing all feedback” in subsection b. 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, unduly burdensome and are beyond what are permitted under applicable rules and codes. Special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Such a request exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure and no information protected by such privileges or evidentiary doctrines

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will be knowingly disclosed. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- e. See Response 21.
- f. See Response 21.
- g. See Response 21. SoCalGas did not incorporate all feedback for various reasons. The themes of feedback that were not incorporated were more instigative in nature as opposed to constructive or raising the level of discourse. Those themes included closing the facility, as well as reference(s) to incineration zones. SoCalGas is aware of the sentiment from some that the compressor station should be closed; however, the facility is needed to continue serving customers in Ventura and up and down the Central Coast which is why the feasibility study was conducted to identify alternative sites. Additionally, SoCalGas recognizes the concerns the community has expressed as to the safety of the compressor station, what is being done to maintain and enhance safety, and have shared that with the community in various forms (the dedicated webpage, newsletters and during the virtual and in-person meetings). See attachments in Response 21.
- h. See the following links and attachments for all documents sent to and received from Commission staff since 10/3/2022 through 1/30/2024. Note, attachments have been redacted to protect the privacy of SoCalGas employees.
 - [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)
 - [Ventura Compressor Modernization Project | SoCalGas](#)
 - [Natural Gas and Oil Pipeline Regulation \(ca.gov\)](#)
 - [Proceeding - Documents \(ca.gov\)](#)
 - [Proceeding - Documents \(ca.gov\)](#)

Attachments:

- VCM_A2308019_CoV_SCG_02_Q80_Attach_01_20221024LtrReqExt
- VCM_A2308019_CoV_SCG_02_Q80_Attach_02_20221108LtrGrantExt
- VCM_A2308019_CoV_SCG_02_Q80_Attach_03_20221123LtrReqGuidance
- VCM_A2308019_CoV_SCG_02_Q80_Attach_04_20221205LtrGrantingExt
- VCM_A2308019_CoV_SCG_02_Q80_Attach_05_20230306EmailProjDesc
- VCM_A2308019_CoV_SCG_02_Q80_Attach_06_20230307EmailProjDesc
- VCM_A2308019_CoV_SCG_02_Q80_Attach_07_20230317Email

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- VCM_A2308019_CoV_SCG_02_Q80_Attach_08_20230324Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_09_20230330Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_10_20230331LtrReqExt
- VCM_A2308019_CoV_SCG_02_Q80_Attach_11_20230407LtrGrantExt
- VCM_A2308019_CoV_SCG_02_Q80_Attach_12_20230427Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_13_20230503Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_14_20230509EmailMOU
- VCM_A2308019_CoV_SCG_02_Q80_Attach_15_20230522LetterPFDeposit
- VCM_A2308019_CoV_SCG_02_Q80_Attach_16_20230523EmailFedEx
- VCM_A2308019_CoV_SCG_02_Q80_Attach_17_20230524DraftPEA
- VCM_A2308019_CoV_SCG_02_Q80_Attach_18_20230524Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_19_20230602Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_20_20230606Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_21_20230615Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_22_20230623EmailPFPEA
- VCM_A2308019_CoV_SCG_02_Q80_Attach_23_20230822EmailPayment
- VCM_A2308019_CoV_SCG_02_Q80_Attach_24_20230824LetterFee
- VCM_A2308019_CoV_SCG_02_Q80_Attach_25_20230905EmailPEAAAttach
- VCM_A2308019_CoV_SCG_02_Q80_Attach_26_20230906Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_27_20230908Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_28_20230915Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_29_20230922Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_30_20231005EmailStateClear
- VCM_A2308019_CoV_SCG_02_Q80_Attach_31_20231024Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_32_20231113EmailMtg
- VCM_A2308019_CoV_SCG_02_Q80_Attach_33_20231117Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_34_20231120Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_35_20231123EmaiRespPEARev
- VCM_A2308019_CoV_SCG_02_Q80_Attach_36_20231201Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_37_20231226Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_38_20231226Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_39_20240102Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_40_20240104Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_41_20240108Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_42_20240108Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_43_20240117ExParteMtg
- VCM_A2308019_CoV_SCG_02_Q80_Attach_44_20240122Invoice
- VCM_A2308019_CoV_SCG_02_Q80_Attach_45_20240125Email
- VCM_A2308019_CoV_SCG_02_Q80_Attach_46_202401236Email

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