

**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 01)
Date Requested: December 14, 2023, Submitted: January 12, 2024**

- DATA REQUEST NO. 1:** At Page 3 of the Application You state that the “Ventura Compressor Station supports SoCalGas’ safe and reliable delivery of gas for two distinct yet interrelated purposes: (a) to serve core and non-core customer demand in the North Coastal system; and (b) to supply gas to the La Goleta Storage Field for injection and storage, which, in turn supports future customer demand and reliability both in the North Coastal System and across the entirety of SoCalGas’ system.”
- a. Regarding the “two distinct yet interrelated purposes” (i.e., serving core and noncore customer demand in the North Coastal system and supplying gas to the La Goleta Storage Field), please provide a percentage breakdown of how the Proposed Project supports each of these two purposes.
 - b. Please provide a breakdown by percentage of the “customer demand in the North Coastal system” that is attributable to each of the following: core and non-core customers.
 - c. Please explain what You mean by “future customer demand” in the North Coastal System and identify the basis on which You project such “future customer demand” in the North Coastal System.

RESPONSE 1:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. Ultimately all natural gas that passes through the Ventura Compressor Station serves customer demand, as gas withdrawn from the La Goleta Storage Field is used to serve demand. Please refer to pages 19-20 of the Application (available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)) for design throughput for the

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VCM project comprised of summer demand and required injection at the La Goleta Storage Field. Actual demand and injection will vary on an hourly, daily, and seasonal basis.

b.

Core	Noncore
70.4%	29.6%

c. Future demand refers to any demand at a time after the time of injection when withdrawal is required from storage.

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DATA REQUEST NO. 2: Relating to Your statement on Page 3 of the Application that the Ventura Compressor Station is “additionally essential to support reliability for the more than 21 million consumers across SoCalGas’ approximately 24,000-square-mile service territory.”

- a. Please explain how the Ventura Compressor Station is “essential to support reliability for the more than 21 million consumers” across Your service territory.
- b. Can gas flow south from the Ventura Compressor Station to reach the rest of SoCalGas’ integrated gas system?
- c. If Your answer to Data Request No. 2, subpart “b” is “yes,” please explain how gas can flow south from the Ventura Compressor Station to reach the rest of Your integrated gas system.

RESPONSE 2:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. Please refer to pages 11-15 of the Application discussing the role of natural gas storage.
- b. Please refer to page 17 of the Application regarding gas flowing south of Ventura Compressor Station. Natural gas can physically reach some areas of SoCalGas’ system south and east of the Ventura Compressor Station, bypassing the compressor station, and can offset demand in other parts of the system on a displacement basis, allowing other sources of supply to serve demand.
- c. Please refer to 2b.

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DATA REQUEST NO. 3: Relating to Your statement on Page 4 of the Application that “since 2010, gas supply from local California producers has dropped off dramatically” and Your related conclusion on Page 4 that “[a]s a result, almost all gas supply to customers in the North Coastal System now goes through the Ventura Compressor Station” and Your related statement that “[t]his increased dependence on the Ventura Compressor Station ... has resulted in “decreased efficiency and increased strain on almost 40-year-old infrastructure that has a design life of 30 years.”

- a. Please confirm whether You track or monitor forecasted gas supply from local California producers.
- b. If your answer to Data Request No. 3, subpart “a” is “no”, why not?
- c. When did You first become aware that gas supply from local California producers was forecasted to decline?
- d. Please produce all Documents relating to Your knowledge that gas supply from local California producers in the North Coastal System was forecasted to decline.
- e. Please identify and explain the actions You took to mitigate the “decreased efficiency and increased strain” on the Ventura Compressor Station that resulted from “almost all gas supply to customers in the North Coastal System” going through the Ventura Compressor Station commencing when You first became aware that gas supply from local California producers in the North Coastal System was forecasted to decline and continuing through the present day.
- f. Did You consider advocating either at the Commission or with state or federal agencies for increased electrification of customer load as a potential mitigation strategy for the “decreased efficiency and increased strain”?
- g. Did You in fact advocate either at the Commission or with state or federal agencies for increased electrification of customer load?
- h. Did You advocate against increased electrification of customer load?
- i. Did You take actions to mitigate the effects to the Ventura Compressor Station of the “decreased efficiency and increased strain”? If not, please explain why not.
- j. Were You able to safely operate the Ventura Compressor Station despite the “decreased efficiency and increased strain”?

RESPONSE 3:

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 terms/phrases “forecasted to decline.” SoCalGas further objects to this request on the grounds it is compound and argumentative. SoCalGas

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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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. No.
- b. SoCalGas does not forecast gas supplies.
- c. Please refer to Response 3b of this data request. Please refer to Figure 4 on page 19 of the Application for recorded North Coastal System producer supplies.
- d. Please refer to Response 3b of this data request.
- e. Please refer to page 4 of the Application.
- f. No.
- g. No.
- h. No.
- i. Yes.
- j. Yes.

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DATA REQUEST NO. 4: Regarding Your description of the natural gas system on Page 10 of the Application, including Your statement that “Ten compressor stations located along the transmission pipelines, include the Ventura Compressor Station, provide the pressurization needed to move the gas through the pipelines.”

- a. Do You have any all-electric compressor stations in Your system?
- b. If Your answer to Data Request No. 4, subpart “a” is “yes,” please identify those all-electric compressor stations by name and location.
- c. For any all-electric compressor stations You identified in response to Data Request No. 4, subpart “b”, please identify and describe all safety and reliability issues at those all-electric compressor stations that You reasonably attribute to the associated compressor station being all-electric.
- d. Are You aware of any all-electric compressor stations in the United States, aside from any in Your system?
- e. Are You aware of any safety or reliability issues that have occurred at any all-electric compressor stations in the United States for which a root cause analysis of the safety or reliability issues determined that the root cause was the compressor station being all-electric?
- f. If Your answer to Data Request No. 4, subpart “e” is yes, please describe those safety or reliability issues.
- g. Do You have any other compressor stations in Your system, aside from the Ventura that are located across the street from an elementary school?
- h. Do any of Your executive-level employees (i.e., Vice President or above) live across the street or within one mile of a compressor station?

RESPONSE 4:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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 and argumentative and seeks disclosure of information which would constitute an unwarranted invasion of personal privacy. 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. 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. 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

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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. Yes.
- b. Sylmar Station. The station is located in the City of Los Angeles in the Sylmar area of the city.
- c. SoCalGas has not experienced any safety or reliability issues at the Sylmar Station.
- d. SoCalGas does not maintain a list of electric compressor stations in the United States.
- e. SoCalGas does not maintain safety or reliability statistics or information for electric compressor stations in the United States
- f. Not applicable.
- g. No.
- h. See objections above.

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DATA REQUEST NO. 5: What is the cost of delivered gas from the Pacific Gas and Electric Company (“PG&E”) system compared to the cost of delivered gas from Your system? Please break your response down by customer class (e.g., core v. non-core, transportation customers, electric generation end users, etc.).

RESPONSE 5:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas’ tariff rates are available here: <https://tariff.socalgas.com/regulatory/tariffs/tariffs-rates.shtml>. PG&E’s Tariff Rates are available here: [Tariffs \(pge.com\)](https://www.pge.com/tariffs)

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DATA REQUEST NO. 6: The Application at Page 18, footnote 13 states that “While SoCalGas has the infrastructure to receive some supply from PG&E at Kettleman Station for delivery to the North Coastal distribution system in San Luis Obispo County at Morro Bay, it is neither a reliable nor guaranteed source. Delivery is limited by the distribution system that receives the supply, so it is insufficient to serve the whole North Coastal System demand ...” Further, that “Morro Bay supplies are an as-available service from PG&E and PG&E did not agree to provide firm deliveries at Kettleman Station when so requested by SoCalGas. As such, SoCalGas does not operate its system with reliance on this potential source.”

- a. Please explain exactly what You asked PG&E to provide when You requested “firm deliveries at Kettleman Station,” including, but not limited to, whether You requested guaranteed volumes, the duration of the commitment You requested, the price You offered to pay, the method for memorializing the agreement (e.g., whether You sent PG&E a draft contract), etc.
- b. Please produce all Documents relating to Your request of PG&E to provide “firm deliveries at Kettleman Station.”
- c. Why did You ask PG&E to provide firm deliveries at Kettleman Station?
- d. Provide the date on which You asked PGE& to provide firm deliveries at Kettleman Station.
- e. What reason did PG&E give for not agreeing to provide firm deliveries at Kettleman Station?
- f. How do You measure reliability?
- g. Regarding Your assertion in footnote 13 that “it is neither a reliable nor guaranteed source,” are you suggesting that PG&E does not provide reliable service?
- h. Please provide reliability statistics for the past 10 years for Your system compared to PG&E’s gas system.
- i. Please provide the number of safety violations for the past 10 years for Your system and for PG&E’s gas system.
- j. Regarding Your assertion that delivery is “limited by the distribution system that receives the supply, so it is insufficient to serve the whole North Coastal System demand,” are You saying that the SoCalGas distribution system is insufficient to supply the North Coastal System demand?
- k. Regarding Your statement that You “do not operate [Your] system with reliance on this potential source,” could You operate a portion of Your system with reliance on this “potential source”?
- l. Please confirm whether Your inclusion of footnote 13 was in response, in whole or in part, to the April 20, 2023 email from the City to You, a copy of which is part of Exhibit 1 to the City’s Protest of the City of Buenaventura, California, a Municipal Corporation of the Application, filed in this proceeding on or about October 6, 2023.
- m. In drafting footnote 13, did You assume that under this alternative scenario You would have the duty to serve all or part of the North Coastal System demand?
- n. Would Your statement in footnote 13 be different if You assumed that PG&E has the duty to serve all or part of the North Coastal System?

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- o. Did You study the alternative of transferring the duty to serve the North Coastal System, in whole or in part, to PG&E? If so, please provide copies of all Documents that relate thereto.
- p. Did You study whether it would be in the best interests of customers in the North Coastal System to transfer the duty to serve the North Coastal System to PG&E? If so, please provide copies of all Documents that relate thereto.
- q. Did You study whether it would be in the best interests of Your remaining customers to transfer the duty to serve the North Coastal System to PG&E? If so, please provide copies of all Documents that relate thereto.
- r. Did You identify or study the costs, if any, of expanding either Your or PG&E's facilities so that PG&E can serve the North Coastal System? If so, please provide copies of all Documents that relate thereto.
- s. Do You consider transferring the duty to serve the North Coastal System to PG&E, in whole or in part, a reasonable alternative to the Proposed Project?
- t. For how many years has PG&E been delivering gas to You to serve the North Coastal System?
- u. For each of the years that PG&E has been delivering gas to You to serve the North Coastal System, what volumes and what percentage of the North Coastal System load was served by gas delivered by PG&E?

RESPONSE 6:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." 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, calls for speculation, 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

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- a. SoCalGas inquired, informally, if PG&E had capacity to provide firm off-system deliveries at Kettleman Station. PG&E's stated that they did not have capacity. Since no firm off-system was available, there was no further discussion of price, duration or contractual details.
- b. There are no substantive documents. The inquiry took place over the course of two phone calls. There were emails to set up the call. See attached.
Attachment:
 - VCM_A2308019_CoV_SCG_01_Q06_Attach_01_Correspondence_Redacted
- c. SoCalGas was evaluating PG&E and firm deliveries at Kettleman as a potential non-pipeline alternative for the Ventura Compressor Station project application.
- d. The inquiry was initiated in an email on February 23, 2023 and subsequent conference calls occurred on April 6, 2023 and September 18, 2023.
- e. Providing firm off-system deliveries impaired their ability to meet their own peak design day standards.
- f. SoCalGas complies with CPUC Decision D.22-07-002, Order 10: "The following definition of reliability is adopted: *Gas reliability is a measure of the gas system's capacity and ability to deliver uninterrupted service. It consists of adequate physical and operational capacity to transport gas in amounts sufficient to meet customer demand.*" Available at:
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M495/K983/495983692.PDF>
- g. No, the service definition at Kettleman Station is stated in the Master Exchange Agreement (MEA), see attached, between SCG and PG&E. Here are two excerpts that address the obligation to serve. Service may be terminated by either party with 90 days' notice. See page 10, paragraph 4.4 of the attached Agreement. Service at the sole discretion of each party, with no liability for failure to deliver, and limited by each party's capacity and facilities. See page 11, paragraph 4.9 of the attached Agreement.
Attachment:
 - VCM_A2308019_CoV_SCG_01_Q0_Attach_02_MasterExchangeAgmt
- h. The requested statistics do not exist.
- i. 53. SoCalGas' safety violations are found at the following link:
<https://www.cpuc.ca.gov/regulatory-services/enforcement-and-citations/pipeline-citations>
SoCalGas does not have PG&E safety statistics.
- j. This statement is taken out of context. SoCalGas' distribution system is adequately sized to serve its customers when supplied by SoCalGas' transmission system. SoCalGas' distribution system was not designed to receive supplies from PG&E and redeliver it to the entire North Coastal System, and it is therefore insufficient to serve the whole North Coastal System with supplies solely from PG&E.
- k. No.
- l. No.
- m. Yes. SoCalGas has a mandated obligation to serve.
- n. No. PG&E does not have an obligation to serve customers on SoCalGas' system or territory.
- o. No.
- p. No.

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- q. No.
- r. No.
- s. No.
- t. The Master Exchange Agreement (see attachment in 6g) was executed on March 1, 1990. The Morro Bay Tap was effective 11/01/1992 on a “standby” status. After the purchase of Line 306 from PG&E in 2021, the exchange point is now at Kettleman Station (upstream end of L306).
- u. SoCalGas originally received deliveries from PG&E at Morro Bay. In May of 2021 SoCalGas purchased Line 306/307 from PG&E and began receiving deliveries at Kettleman Station Interconnect. The table below shows annual deliveries to those points. Information prior to 2020 is unavailable due to record retention polices. The readily available information is provided below in the table. The North Costal System annual load is outlined the CAUSE-SCG-05 Data Request Question 1 available at: [Ventura Compressor Modernization Project \(VCM\)-CPCN Application | SoCalGas](#)

Year	Total (MCF*)
2020	7,057,368
2021	8,466,229
2022	2,363,593
2023 (January through November)	5,421,366
*Total MCF is estimated from dekatherms (Dth) using 1028 heating value	

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DATA REQUEST NO. 7: Regarding the North Coastal System described and discussed in the Application

- a. Please produce a map showing the boundaries and location of the North Coastal System.
- b. If no map of the North Coastal System boundaries exists, please describe the North Coastal System boundaries by reference to cities, counties, landmarks, etc.
- c. Please identify all franchises within the North Coastal System.
- d. Please produce all Commission Orders authorizing You to serve the North Coastal System.

RESPONSE 7:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. Please refer to page 15 and Figure 3 in the Application for a description and map of the North Coastal System. Additionally, please see the following link for tariff maps depicting service zones on the SoCalGas system available at: https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-MAPS_Local_Svc_Zones.pdf

As described in the Application, the “North Coastal System” is comprised of the entire North Coastal System Local Service Zone on pages 3, 4, 7, and 8, and the Coastal System Local Service Zone on pages 4, 7, and 8 generally west of California State Route 33 where the Ventura Compressor Station is located.

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- b. Not applicable.
- c. See the List of Cities and Communities Served by SoCalGas at:
https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-CITIES_CITIES.pdf
- d. See the approved List of Cities and Communities Served by SoCalGas as approved by the CPUC in Advice Letters 4033 available at:
https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/submittals/GAS_4033.pdf and Advice Letter 4530 available at: [GAS_4530.pdf \(socalgas.com\)](https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/submittals/GAS_4530.pdf)

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DATA REQUEST NO. 8: Regarding the Ventura Compressor Station in its current configuration

- a. Please provide the Occupational Safety and Health Administration (“OSHA”) Total Recordable Incident Rate for each of the previous 10 years.
- b. How many times in each of the previous 10 years have You experienced incidents at the Ventura Compressor station rising to the level of a “safety incident” or prompting You to institute a safety stand down?
- c. How many times in each of the previous 10 years has the fire department or other emergency responders been called to or arrived at the Ventura Compressor Station?

RESPONSE 8:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” 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 terms/phrases “safety incident.” 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 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. SoCalGas does not maintain a Total Recordable Incident Rate (TRIR) rate at the facility-level; consequently, this information is not available for the Ventura Compressor Station.
- b. SoCalGas understands the term “safety incident” to meet the criteria established by OSHA for “Recording and Reporting Occupational Injuries and Illnesses” defined in OSHA Standard 1904.39. In the past ten years, there have been no safety incidents at Ventura Compressor Station that required reporting pursuant to Standard 1904.39 and no incidents that have prompted a safety stand down. SoCalGas does proactively hold tailgate meetings throughout construction and maintenance activities to share jobsite safety information.
- c. SoCalGas interprets this question to apply to non-routine business activities at the Ventura Compressor Station. Routine business activities such as first responder training/tours or

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agency inspections are not included. The Ventura City Fire Department is the primary emergency response agency for a natural-gas-related emergency incident and the Ventura City Police Department for a law enforcement incident at the facility. SoCalGas notes that the fire department, law enforcement or emergency responders may be dispatched to the Ventura Compressor Station but not make contact with company staff. In this instance, SoCalGas would have no data available. Based on SoCalGas's available information dating to 2019, there has been one instance where the fire department, law enforcement or other emergency responders have been called to or arrived at the Ventura Compressor Station.

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DATA REQUEST NO. 9: Regarding Your assertion in the Application at Page 60 that “SoCalGas takes its safety commitment seriously.”

- a. When did You start taking Your safety commitment seriously?
- b. Did the Aliso Canyon leak occur before or after You began taking Your safety commitment seriously?
- c. Was the Aliso Canyon incident in line with, or a violation of, Your safety culture?
- d. Has the Commission instituted any investigations, formal or informal, into Your safety culture?
- e. If Your answer to Data Request No. 9, subpart “d” is “yes,” please describe the results of the investigation(s) and produce all Documents issued by the Commission and other governmental agencies.
- f. Have You received any notices of safety violations or safety citations from the Commission or any other federal, state, or local agency?
- g. If Your answer to Data Request No. 9, subpart “f” is “yes,” please provide dates and a description of each notice of safety violation and/or citation and whether any corrective action was ordered.
- h. How many deaths or injuries have been attributed to Your equipment as the result of an internal or external investigation during the previous 10 years?
- i. Have You been investigated by the Commission for potential violations of other non-safety regulations, including but not limited to the Commission’s Rule 1?
- j. If Your answer to Data Request No. 9, subpart “i” is yes, please describe those investigations and produce all Documents related thereto.

RESPONSE 9:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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 terms/phrases “safety violations”, “safety citations, and “non-safety regulations”. 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. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. 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

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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. SoCalGas' approach to safety is built on our tradition of providing safe and reliable service for 150 years and is summarized in our Commitment to Safety statement (available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M312/K540/312540512.PDF>), which is embraced and endorsed by every member of our senior management team: SoCalGas' longstanding commitment to safety focuses on three primary areas – employee/contractor safety, customer/public safety and the safety of gas delivery system. This safety focus is embedded in what we do and is the foundation for who we are – from initial employee training, to the installation, operation and maintenance of our utility infrastructure, and to our commitment to provide safe and reliable service to our customers. To promote these principles throughout, and to foster a culture of continuous safety improvement, “[t]he company continuously strives for a work environment where employees at all levels can raise pipeline infrastructure, customer safety, and employee safety concerns and offer suggestions for improvement.”¹
- b. See objections above.
- c. See objections above.
- d. Yes. the Commission opened I.19-06-014 (Safety Culture OII).
- e. The Safety Culture OII documents are publicly available at the following link: https://apps.cpuc.ca.gov/apex/f?p=401:56:::RP,57,RIR:P5_PROCEEDING_SELECT:11906014
- f. Yes, CPUC Gas Safety Citations /Violations are posted at the following CPUC link: <https://www.cpuc.ca.gov/regulatory-services/enforcement-and-citations/pipeline-citations>
- g. See response to 9 f.
- h. See objections above.
- i. Yes.
- j. See objections above.

¹ I.19-06-014 SoCalGas Response to Order Instituting Investigation July 29, 2019

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DATA REQUEST NO. 10: Footnote 38 of the Application at Page 65 describes a “fence-line methane monitoring system” that You claim to be “calibrating, testing, and evaluating,” and which, as You say, will “be capable of continuously detecting levels of methane at the facility perimeter” once it is operational in Q4 of 2023.

- a. What is the earliest date by which You could install such a system?
- b. Were You ordered by the Commission to install such a system?
- c. What system do You have in place to monitor methane at the facility perimeter now?
- d. Do You know how much total methane You have leaked or flared into the atmosphere and local community from the Ventura Compressor Station?
- e. Please provide methane leak volumes from the Ventura Compressor Station for each of the previous 10 years.
- f. Please produce all Documents that study the health effects of methane leaks from the Ventura Compressor Station for the previous 10 years.
- g. If Your answer to Data Request No. 10, subpart “c” is “none,” how does it align with Your safety culture to not track methane emission levels at the facility perimeter?

RESPONSE 10:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” 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 speculative. 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. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. 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 fence-line methane monitoring system was installed in November 2022.
- b. No.

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- c. SoCalGas has installed methane monitoring system which consists of four open path tunable diode laser sensors with sensing capabilities from 0 to 2500 ppm/m.
- d. SoCalGas does not flare natural gas at the Ventura Compressor Station. Methane emissions are provided in SoCalGas's annual SB1371 report. Available at: [R. 15-01-008 – Natural Gas Leakage Abatement Rulemaking | SoCalGas](#)
- e. Please see the response to Question 10d.
- f. No health study exists on the health effects of methane from the Ventura Compressor Station.
- g. Not applicable.

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DATA REQUEST NO. 11: Regarding the “essential site criteria” that You define as “those criteria that must be met to construct and operate a compressor station” and list on Page 70 of the Application as “(a) Property acreage is at least 8 acres, but ideally 10 acres or larger, especially for sites with slopes greater than an average of 15% to account for graded cut/fill sloped [footnote omitted]; (b) the site must be owned by private property owners or SoCalGas (i.e., not a local, state, or federal agency); (c) the site is compatible with Federal Aviation Administration (FAA) requirements for land use; and (d) the site is not within a Federal Emergency Management Agency (FEMA) mapped floodway.”

- a. Who determined that these are acceptable essential site criteria?
- b. When did the person or entity You identified in Your response to subpart “a” determine that these are acceptable site criteria?
- c. As to each essential site criterion, state the basis for its inclusion.
- d. Why is it essential that the property not be owned by a local, state, or federal agency?
- e. Why is it essential for the site to not be in a FEMA mapped floodway?
- f. Why is it not essential for the site to not be in a mapped tsunami hazard zone (e.g., an area identified on a California Department of Conservation Tsunami Hazard Area Map)?
- g. Why is it not essential for the site to not be in an earthquake hazard zone (e.g., a Seismic Hazard Zone as identified and mapped by the California Department of Conservation)?
- h. Have You accounted for the potential for tsunamis and seismic events in designing the Proposed Project?
- i. Why do You not consider it essential to avoid siting the Proposed Project in an ESJ Community?
- j. Please produce all Documents that relate to Data Request No. 11, subpart “i”.
- k. Was cost for the Proposed Project a factor You considered in listing alternative sites?

RESPONSE 11:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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 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. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome.

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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. SoCalGas
- b. March 2022
- c. Essential site criteria are those criteria that must be met to construct and operate a compressor station. The basis for each essential site criterion noted on Page 70 of the Application are as follows:
 - Site Acreage: SoCalGas operates nine compressor stations on its integrated gas transmission system. The property acreage of these compressor stations vary in size from less than an acre to more than 100 acres, with a median size of 39 acres and an average size of roughly 40 acres. To safely operate a compressor station, adequate space within and around buildings and pipelines is necessary, which is dependent on the operational needs of the particular facility. The existing station is operating on 8 acres but given that the median compressor station size for SoCalGas' 9 compressor stations is 39 acres and the average compressor station size is 40 acres, at least 10 acres is needed for a new compressor station to provide for operational needs and to address slopes/grading.
 - Property Ownership: As a public utility, SoCalGas has the ability to condemn private land through the eminent domain process. Eminent domain is the process by which a government agency or utility can take property for public benefit as long as the property owner is adequately compensated.
 - FAA Requirements: The FAA sets forth guidance for development near airports and land use compatibility. This guidance is typically implemented at the regional level by Airport Land Use Commissions (ALUC).² Certain types of land uses are limited or prohibited near airports for safety reasons, such as industrial-scale land uses and utility-scale solar arrays, due to glare.
 - FEMA Floodway: FEMA regulatory floodways are defined as "the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height".³ Further, "[t]he community is responsible for maintaining the floodway

² The California Public Utilities Code, Sections 21670 et seq., requires the County Board of Supervisors to establish an ALUC in each county with an airport operated for the benefit of the public. The Code also sets forth the range of responsibilities, duties, and powers of the ALUC. In Ventura County, the Board of Supervisors has designated the Ventura County Transportation Commission to act as the ALUC for the County.

³ FEMA Glossary. <https://www.fema.gov/glossary/floodway>.

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to mitigate flood hazards; the community must not allow any activities causing a rise in the Base Flood Elevation (BFE) in the regulatory floodway”.⁴

- d. The existing Ventura Compressor Station is owned by SoCalGas. SoCalGas determined that private land control was an essential site criterion because SoCalGas may need to acquire property through the eminent domain process as a last resort if a landowner of an alternative site location does not voluntarily sell property.
- e. The existing Ventura Compressor Station is not located in a mapped FEMA floodway. SoCalGas determined that avoidance of a FEMA floodway is an essential site criterion for an alternative site location because as a prudent operator, SoCalGas would not voluntarily select a compressor station site that is within a “channel of a river or other watercourse and the adjacent land area.”
- f. The existing Ventura Compressor Station is not located in a mapped tsunami hazard zone. SoCalGas did not identify a mapped tsunami hazard zone as an essential site criterion for a compressor station because these areas generally follow the coastline and extend inland in low-lying areas that follow coastal sloughs/wetlands and waterways, which are also typically mapped FEMA Floodway.
- g. Like many other critical facilities such as hospitals, government buildings, fire stations, schools, etc., seismic hazard zone risk can generally be addressed by implementing measures at the recommendation of a geologist, geotechnical engineer, and/or civil/structural engineer and following standard building code requirements. Much of the State of California is affected by mapped seismic hazard zones.
- h. SoCalGas has not accounted for tsunamis because as noted on Page 5.10-4 of the PEA (available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#)), the Project Site is not within a tsunami inundation zone and is located 1.5 miles north of the coast, at an elevation of about 65 feet above mean sea level. SoCalGas has accounted for seismic events as noted in the PEA, Appendix I: Preliminary Report of Geotechnical Investigation. Detailed engineering design of the selected project will also take into account seismic constraints.
- i. Essential site criteria are those criteria that must be met to physically construct and physically operate a compressor station. Since 1923, a compressor station has been located at the current Ventura Compressor Station site and the current equipment has been onsite since the 1980s. SoCalGas is seeking to improve emissions at the compressor station, consistent with the CPUC’S ESJ Action Plan.
- j. Please refer to the CPCN Application Page 109-110 for further information regarding consideration of ESJ.
- k. SoCalGas is interpreting this question to mean whether SoCalGas accounted for costs when identifying alternative sites. No SoCalGas did not consider the costs of the Proposed Project when identifying alternative sites. Alternative site locations were identified based on the ability to meet the purpose and need of the project.

⁴ FEMA “Guidance for Flood Risk Analysis and Mapping. Floodway Analysis and Mapping.” November 2019

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DATA REQUEST NO. 12: Regarding alternatives

- a. Please identify all alternatives You considered but did not include in Your Application.
- b. Please produce all Documents that relate to the alternatives identified in response to Data Request No. 12, subpart “a.”

RESPONSE 12:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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 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. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. 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. Alternatives considered but not included in the CPCN Application include the following:
 - Increased Horsepower: This option proposed 15,000 HP 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.
 - All-Gas Compression: This option would result in the construction of a new compressor building and installation of four new natural gas engine-driven compressors at 1,900 HP each at the existing compressor station site. The existing three 1,100 HP natural gas reciprocating compressors would remain in operation until the new equipment is commissioned and in service. The existing compressors would then be decommissioned and removed and the old compressor building demolished. The existing office trailer and

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storage containers would be demolished/removed after a new office and a warehouse are constructed onsite.

- Compressor Station Removal: The Compressor Station Removal Alternative would result in the decommissioning of the existing compressor station and removal of the onsite infrastructure, without relocating compression to a new location. Compression from the Ventura Compressor Station to move natural gas north to Santa Barbara and San Luis Obispo counties would no longer be provided.
 - 3/1 Hybrid Compression: The 3/1 Hybrid Compression option would result in the installation of three new 1,900 HP electric compressors and one 1,900 HP natural gas compressor. Electricity would be provided by the Southern California Edison (SCE) electric grid and require a new onsite substation and potentially one new circuit, with an additional circuit for redundancy.
 - La Goleta Storage Field: The La Goleta Storage Field Alternative would result in the installation of new compression equipment at the La Goleta Storage Field. The Ventura Compressor Station provides the necessary pressure to supply the Coastal System north of the Ventura Compressor Station and to support injection at the La Goleta Storage Field. With the loss of compression at the Ventura Compression Station, new compression equipment would be installed to offset the loss of pipeline pressure currently provided by the Ventura Compressor Station and support injection.
 - Petrochem: Approximately 15-acre industrial site designated and zoned for industrial uses located approximately 13,500 feet northwest of the compressor station on the west side of State Route (SR) 33 within the County of Ventura.
 - County Line: Approximately 12.33-acre vacant parcel of land designated and zoned for agriculture located within County of Ventura at the county line between Santa Barbara/Ventura counties approximately 12 miles northwest of the existing compressor station.
- b. Documents can be found at: SoCalGas 2016 GRC Application A.14-11-004 ([A.14-11-004 - SoCalGas 2016 General Rate Case – November 14, 2014 | SoCalGas](#)), SoCalGas 2016 GRC Application A.17-10-008 (<https://www.socalgas.com/regulatory/A17-10-008>) and, SoCalGas' March 2022 Feasibility Study ([Ventura Compressor Modernization Project | SoCalGas](#)).

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DATA REQUEST NO. 13: Regarding Table 3 at Page 76 of the Application.

- a. Please provide a breakdown of each Customer Class (e.g., Core – Residential, Core – Commercial and Industrial, etc.) stating that Customer Class’s percentage of overall load.
- b. Please identify the customers in the “Non-Core – Enhanced Oil Recovery” Customer Class, anonymized to the extent necessary to comply with the Commission’s customer privacy rules.
- c. For each customer You identified in response to Data Request No. 13, subpart “b,” please confirm whether this customer still operates its Enhanced Oil Recovery facility.
- d. Please identify the customers in the “Electric Generation” Customer Class, anonymized to the extent necessary to comply with the Commission’s customer privacy rules, and for each customer provide the nameplate capacity of that customer’s electric generation facility.
- e. For each customer You identified in response to Data Request No. 13, subpart “d,” please confirm whether this customer still utilizes its facility to generate electricity.

RESPONSE 13:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. SoCalGas objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 et seq.; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) 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

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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. Below is the breakdown for 2022.

Year	Residential	Core C&I	Noncore
2022	42.7%	27.8%	29.6%

- b. SoCalGas objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 et seq.; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.)
- c. See response to 13 b.
- d. See response to 13 b.
- e. See response to 13 b.

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DATA REQUEST NO. 14: Regarding the Road Site alternative, as described in the Application at Pages 100-102.

- a. Please identify all actions You undertook to determine whether You could purchase, lease, or otherwise occupy this site for a new compressor station.
- b. Regarding Footnote 60 at Page 101 of the Application, please explain what You mean that You “reached out to the property owner.”
- c. Did You make an offer to purchase this site?
- d. Please produce all Documents that relate to Data Request No. 14, subparts “a”, “b”, and “c”.
- e. What is the Road Site currently used for?
- f. Please explain what You mean when You say “[e]ven if eminent domain were available to acquire the property ...”
- g. Do You have the power of eminent domain?
- h. Please identify all instances in the previous 10 years in which You have used eminent domain to acquire property.
- i. Provide support for your assertion at Page 101 that “it could take years through the court system” to acquire this property by eminent domain.
- j. Are You aware of any rights You have to take possession to property prior to agreeing upon a fair market value compensation?
- k. Is the Road Site located across the street from an elementary school?

RESPONSE 14:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas 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. 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. 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. 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).

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Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. Property ownership identification.
- b. See attached correspondence.
Attachment:
 - VCM_A2308019_CoV_SCG_01_Q14_Attach_01_DevilsCanyonRoadCorrespondence
- c. No.
- d. See Attachment in 14b.
- e. Please refer to the SoCalGas PEA Page 1-7, which states that the Devil’s Canyon Road alternative site is "approximately 12.88-acre oil extraction site designated for open space uses and zoned for agriculture."
- f. If the property could not be acquired through voluntary acquisition, SoCalGas would have to consider whether eminent domain would be appropriate for the acquisition.
- g. Yes. Pursuant to California Public Utilities Code section 613, SoCalGas may condemn any property necessary for the construction and maintenance of its gas plant.
- h. In the past 10 years, SoCalGas has acquired property through eminent domain for six projects, see below.

Project Name
Santa Ana Gas Station acquisition
Line 404/Line 406 Placco
Line 1185 Remediation
Line 2001 West Santa Ana River
Supply Line 36-1032 Sections 13 & 14
Supply Line 33-750 Haskell Station

- i. To acquire property through eminent domain litigation involves multiple processes (even before litigation) and is subject to formal challenge at various stages of the process.
- j. SoCalGas could seek prejudgment possession after filing eminent domain litigation, but it could be subject to challenge by the property owner and, ultimately, would be subject to the court’s ruling.
- k. No.

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DATA REQUEST NO. 15: The Application at Page 111 says the City “has been briefed on the CPCN application process, milestones, and opportunities to engage.”

- a. Please identify by name and job title the person or persons at the City that You briefed, the dates on which You briefed them, and the substance of the briefing.
- b. Produce all Documents relating to Your briefing of the City on the CPCN application process.

RESPONSE 15:

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 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. SoCalGas objects to the request for “all Documents” as overbroad and unduly burdensome. 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. Please refer to the SoCalGas PEA Appendix G: Agency Consultation and Public Outreach Report and Records of Correspondence. After the Applications and accompanying PEA was submitted, SoCalGas have not briefed city officials verbally. However, SoCalGas did send a newsletter to city officials, and it contained an update about the application’s status. See attached.

Attachment:

- VCM_A2308019_CoV_SCG_01_Q15_Attach_01_CityCorrespondence

- b. See response 15a.

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DATA REQUEST NO. 16: You state in the Application at Page 148 that You have “responded to many Commission issued data requests for this project.”

- a. Please identify the proceeding and context in which the Commission issued these data requests (e.g., prior rate cases, this proceeding, etc.).
- b. Please produce all Commission-issued data requests related to “this project” as well as Your responses thereto.

RESPONSE 16:

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 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

- a. SoCalGas received and responded to six data requests from the CPUC Energy Division about the Ventura Compressor Modernization Project between May 2021 and May 2022. These data requests were received outside the scope of a formal proceeding. These data requests and responses can be found here: [Natural Gas and Oil Pipeline Regulation \(ca.gov\)](https://www.cpuc.ca.gov/natural-gas-and-oil-pipeline-regulation). SoCalGas received and responded to one data request from the CPUC Safety and Enforcement Division (SED) about the Ventura Compressor Modernization Project in August 2021. See attached. Attachment:
 - VCM_A2308019_CoV_SCG_01_Q16_Attach01_SED_DR1_08192021
- b. See 16a

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DATA REQUEST NO. 17: Please produce all data requests relating to the Ventura Compressor Modernization project (i.e., the Proposed Project) and variants thereof and Your responses thereto that You received and responded to in any Commission proceeding, inclusive of, but not exclusive to, this proceeding and proceeding A.22-05-016, and for each response to this Data Request No. 17, identify the proceeding.

RESPONSE 17:

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 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).

Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Data requests related to this proceeding, A.23-08-019 are available at: [Ventura Compressor Modernization Project \(VCM\)- CPCN Application | SoCalGas](#). Data requests in A.22-05-015 (SoCalGas 2024 General Rate Case (GRC)), A.17-10-008 (SoCalGas 2019 GRC), and A.14-11-004 (SoCalGas 2016 GRC) related to the Ventura Modernization Project are attached.

Attachments:

- VCM_A2308019_CoV_SCG_01_Q17_Attach01_A1411004_ORA_SCG_DR092
- VCM_A2308019_CoV_SCG_01_Q17_Attach02_A1411004_SCGC_DR03
- VCM_A2308019_CoV_SCG_01_Q17_Attach03_A1710008_TURN_DR051
- VCM_A2308019_CoV_SCG_01_Q17_Attach04_A2205015_SCGC_SCG_DR002Q910
- VCM_A2308019_CoV_SCG_01_Q17_Attach05_A2205015_CEJA_SCG_003
- VCM_A2308019_CoV_SCG_01_Q17_Attach06_A2205015_CEJA_SCG_06
- VCM_A2308019_CoV_SCG_01_Q17_Attach07_A2205015_CEJA_SEU_001

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- VCM_A2308019_CoV_SCG_01_Q17_Attach08_A2205015_PAO_SCG_052