

Data Request Number: CEJA-SEU-06
Proceeding Name: A2205015_016 - SoCalGas and SDGE 2024 GRC
Proceeding Number: A2205015_016 2024 GRC
Publish To: California Environment Justice Association
Date Received: 8/29/2022
Date Responded:9/13/2022

General Objections to Data Request CEJA-SCG-006:

SoCalGas generally objects to the data request to the extent that it includes requests for information that generally falls within the TSA Pipeline Security Guidelines or within confidential customer information. SoCalGas maintains publicly accessible gas transmission and high-pressure distribution pipeline interactive maps on its website accessible here: <https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>. Additionally, to enhance transparency and awareness, SoCalGas also provides customers with a consolidated, searchable map that provides methane emissions data collected since 2016 for distribution mains and service lines. The data is collected through the company's various routine surveying practices and operational and maintenance practices performed on its distribution pipeline system. The data is updated on an annual basis (June to July). This information can be accessed here: <https://www.socalgas.com/stay-safe/distribution-pipelines-emissions-map>.

SoCalGas also generally objects to this data request to the extent that the requests demand information concerning the purpose and need for the Ventura Compressor Modernization Project which was litigated in the 2019 General Rate Case (“GRC”). As noted in Commission Decision (“D.”) 19-09-051, the CPUC recognized the importance of maintaining operational reliability and safety of the gas transmission system, finding 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 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

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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.” D.19-09-051 at pp. 116–117 (emphasis added).

SoCalGas reiterates its general objection as stated in Data Request CEJA-SCG-003 to the extent that any requests conflate the analysis in SoCalGas’s March 2022 Feasibility Study of Potential Alternatives for the Ventura Compressor Station Modernization Project (“Feasibility Study”) with SoCalGas’s request in the 2024 GRC.

Subject to these objections, SoCalGas provides the responses herein.

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1. Please provide a map of the SoCalGas' gas system that legibly identifies as many of the following as possible: major transmission and distribution pipelines, compressor stations, M&R stations, storage facilities, and supply points.

SoCalGas Response 1:

SoCalGas incorporates the General Objections stated above. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas maintains its pipeline information that is available to the public on its website:

- Transmission and high-pressure distribution pipelines:
<https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>
- Distribution mains and services:
<https://www.socalgas.com/stay-safe/distribution-pipelines-emissions-map>

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2. Please separately identify all commercial, industrial, and transport customers downstream of the Olive St. (Ventura) compressor station. For each customer identified, please provide annual usage (Mcf) for each of the last 5 years. Please provide this and all proceeding responses in unlocked spreadsheet format with all formulae, calculations, and data present and unlocked when available.

SoCalGas Response 2:

SoCalGas incorporates the General Objections. SoCalGas objects to the request in that it seeks information that is protected customer data and data covered by the California Consumer Privacy Act. SoCalGas objects to this request on the grounds that it calls for speculation. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

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3. Please identify any large (C&I or transport) customers downstream of the Olive St. (Ventura) compressor station that the Company expects to no longer service within the next 10 years.

SoCalGas Response 3:

SoCalGas incorporates the General Objections. SoCalGas objects to the request in that it seeks information that is protected customer data and data covered by the California Consumer Privacy Act. SoCalGas objects to this request on the grounds that it calls for speculation. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

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4. Please provide hydraulic modeling data that demonstrates the impact of the Ventura Compressor Modernization (“VCM”) project on downstream customers and pressure at the Goleta storage facility. In this response, please specifically provide:

- a. Pressures at key nodes under design day conditions with and without the VCM project in service that demonstrate areas that would currently experience low pressure (identify the threshold SCG uses for low pressure)
- b. Pressures at key nodes under design day conditions without the compressor station in service at all that demonstrates areas that would experience low pressure.

SoCalGas Response 4a:

SoCalGas incorporates the General Objections stated above. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

SoCalGas Response 4b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

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5. Please provide the number of days or hours that the Goleta storage facility has been in a “filling” state in each of the last 5 years while the Olive St. (Ventura) compressor was operational. Inasmuch as such data is unavailable, please provide the number of days or hours that the Goleta storage facility has been in a filling state in each of the last 5 years, regardless of the status of the Olive St. (Ventura) compressor station.

SoCalGas Response 5:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

The following information is for the 5-year period from September 1, 2017, through August 31, 2022.

2017	103 Days on Injection
2018	229 Days on Injection
2019	221 Days on Injection
2020	226 Days on Injection
2021	219 Days on Injection
2022	143 Days on Injection (as of September 1, 2022).

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6. Please provide the minimum volume (Mcf) at the Goleta storage facility that SCG requires to meet it's expected annual demand for each of the last 5 years. In this response, indicate the volumes above the minimum storage volumes required to maintain outlet pressure. In other words, what volumes did the Company plan to be available for withdrawal each year.

SoCalGas Response 6:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

For the past several years, SoCalGas has planned to maintain a minimum of 7.5 billion cubic feet ("BCF") of inventory in the La Goleta storage field ("La Goleta") through the end of the winter season. As explained in the Winter Technical Assessments:

"The Ventura compressor station is necessary to fill the Goleta storage field, and because of the capacity at the station, if SoCalGas were to draw La Goleta inventory down to near zero inventory, it is expected that the field could not be refilled in the summer ... operating season to sufficient levels needed to support winter ... demand. SoCalGas will therefore manage its system to maintain 7.5 BCF at La Goleta through March ..."¹

¹ Winter 2021-22 Technical Assessment, page 8-9.

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7. Please provide the maximum number of days in a year that the Olive street (Ventura) compressor station could remain out of service before:
- a. The Goleta storage facility would become underfilled for the year
 - b. Customer outages would occur

SoCalGas Response 7a:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas's injection into La Goleta generally occurs from April 1 through October 31 during the warmer summer months. If La Goleta is drawn down to the minimum levels provided in the above response to Question 6 during the winter season (generally November through March) any outage at the existing Ventura compressor station during the injection months may impede the ability to reach maximum inventory levels.

SoCalGas Response 7b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas has not made this analysis to determine the number of days that would impact customers under all possible conditions.

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8. Refer to the Feasibility Study of Potential Alternatives for the VCM, pg. 20 which states “Under most operational conditions, the customers cannot be served with only one compressor in service [...]”.

- a. Please provide the basis for this claim including sufficient data to replicate SoCalGas’ finding;
- b. Please provide the size of the “one compressor” that SoCalGas is referencing;
- c. Please identify the capacity/compressor size/other metric threshold at which SoCalGas believes that customers can be served under “most operational conditions”.

SoCalGas Response 8:

For responses to Questions 8a-8c, SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas objects to the extent that the request conflates the analysis in SoCalGas’s March 2022 Feasibility Study with the request in the 2024 General Rate Case.

SoCalGas Response 8a:

SoCalGas incorporates the General Objections.

SoCalGas Response 8b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas objects to the extent that the request

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SoCalGas Response 8b: -Continued

conflates the analysis in SoCalGas's March 2022 Feasibility Study with the request in the 2024 General Rate Case.

SoCalGas Response 8c:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas objects to the extent that the request conflates the analysis in SoCalGas's March 2022 Feasibility Study with the request in the 2024 General Rate Case.

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9. Has SoCalGas considered a new tap on the PG&E supply in the Morro Bay region to connect to the Company's high-pressure distribution or transmission pipelines in the area as a standalone alternative to the proposed VCM project or in conjunction with a reduced scope/size VCM project? If so, please provide all data relating to this comparison.

SoCalGas Response 9:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

No, because the Morro Bay tap is too far north and would not be able to sustain the costal transmission system.

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10. Refer to SoCalGas' response to CEJA-SEU-001, Question 9. Regarding the gas supply from PG&E, please provide:

- a. Annual throughput at the tap/M&R station for each of the last 5 years;
- b. Whether increased gas from this supply point is limited by current infrastructure, contractual agreements with PG&E or both. Please provide a detailed explanation to support your response.

SoCalGas Response 10a:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

SoCalGas Response 10b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

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11. Refer to SoCalGas' response to CEJA-SEU-001, Question 9. Regarding the pipelines that connect the Morro Bay area distribution system to the Ventura area distribution system. Please provide the number of miles of main that connect these systems separated:

- a. by diameter,
- b. by MAOP, and
- c. by type (distribution or transmission).

SoCalGas Response 11:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas maintains its pipeline information that is available to the public on its website:

Transmission and high-pressure distribution pipelines:

<https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>

Distribution mains and services:

<https://www.socalgas.com/stay-safe/distribution-pipelines-emissions-map>

The National Pipeline Mapping System ("NPMS") Public Viewer provides information about pipelines owned and operated by other entities (such as PG&E). The NPMS Public Viewer can be accessed here: <https://pvnps.phmsa.dot.gov/PublicViewer/>

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12. Regarding the pipe identified in SoCalGas' response to Question 11 above, please provide a map that displays:

- a. The distribution main and transmission main in the Morro Bay and Ventura areas as well as all such pipeline between the two,
- b. The approximate locations of all transport customers, and
- c. The approximate locations of all large C&I customers.

SoCalGas Response 12a:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas maintains its pipeline information that is available to the public on its website:

Transmission and high pressure distribution pipelines:

<https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>

Distribution mains and services:

<https://www.socalgas.com/stay-safe/distribution-pipelines-emissions-map>

The National Pipeline Mapping System ("NPMS") Public Viewer provides information about pipelines owned and operated by other entities (such as PG&E). The NPMS Public Viewer can be accessed here: <https://pvnpm.phmsa.dot.gov/PublicViewer/>

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SoCalGas Response 12b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to the request in that it seeks information that is protected customer data and data covered by the California Consumer Privacy Act.

SoCalGas Response 12c:

See response to Question 12b above.

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13. Refer to SoCalGas' response to CEJA-SCG-003, Question 6-a.
- a. Please provide the basis for the statement that “The expected growth in electrification poses considerable uncertainty on when [...] will the impact be on gas demand”.
 - b. In the referenced response, is the Company referencing something other than gas-fired electric generation when speaking about the relationship between increasing electrification and increasing load uncertainty?

SoCalGas Response 13a:

SoCalGas incorporates the General Objections. SoCalGas further objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the request for information concerning what is in the California Gas Report. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Please refer to the 2020 California Gas Report accessible here:
<https://www.socalgas.com/regulatory/cgr>

SoCalGas Response 13b:

See response to Question 13a.

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14. Refer to the Company's response to CEJA-SCG-003, Question 12. Please confirm the following:

- a. That in the preparation of the Hybrid Option in the Company's feasibility study, the Company prepared a cost estimate
- b. That in the referenced cost estimate for the Hybrid Option, there are separate costs for the gas and electric compressor units

SoCalGas Response 14a:

SoCalGas incorporates the General Objections. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Yes.

SoCalGas Response 14b:

SoCalGas incorporates the General Objections. SoCalGas further objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase "separate costs for the gas and electric compressor units." Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Yes.

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15. Please provide the cost estimate for the Hybrid Option discussed in the feasibility study with costs solely allocated to gas compressors and costs solely related to electric compressors identified.

SoCalGas Response 15:

SoCalGas objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “separate costs for the gas and electric compressor units.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas has not prepared a cost estimate that breaks down all costs that may be solely related to gas compressors and costs solely related to electric compressors.

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16. Refer to the Feasibility Study of Potential Alternatives for the VCM, pg. 21-22 which discusses backup power storage for an all-electric station design.
- a. Please confirm that the referenced 5 days of stored power from BESS and fuel cells is representing 5 days of all four electric compressors running.
 - b. Please confirm that the same amount of stored power could approximately supply three compressors for 6.7 days, two compressors for 10 days, and one compressor for 20 days. If not, please separately estimate via the same methodology the number of days that BESS and fuel cell energy storage could supply one compressor, two compressors, and three compressors. Provide all inputs and calculations for these estimations.

SoCalGas Response 16a:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas objects to the extent that the request conflates the analysis in SoCalGas's March 2022 Feasibility Study with the request in the 2024 General Rate Case.

SoCalGas Response 16b:

SoCalGas incorporates the General Objections. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas objects to the extent that the request conflates the analysis in SoCalGas's March 2022 Feasibility Study with the request in the 2024 General Rate Case.

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17. Refer to SoCalGas' response to CEJA-SEU-001, Question 7. Regarding the Sylmar all electric compressor station, please provide:

- a. The construction date of this facility;
- b. The number of maintenance events per year for years 2018-2021 and the duration of each;
- c. All lifetime events during which the Sylmar compressor station was out of operation due to a power outage (due to a PSPS or otherwise). For each event in this response please include: the date, the duration, the cause of the outage, and any consequences of the outage (monetary, customer outages, etc.).

SoCalGas Response 17a:

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SoCalGas Response 17b:

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SoCalGas Response 17c:

0

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18. Regarding each type of new compressor unit planned to be installed as part of the VCM project:

- a. Verify whether or not SoCalGas has evaluated the impacts of hydrogen/natural gas blended fuel on the equipment;
- b. What range of percentage hydrogen blend does SoCalGas anticipate this equipment may experience?
- c. What is the expected useful life of this equipment in typical natural gas only service and with blended hydrogen fuel?
- d. Does SoCalGas believe that the use of blended hydrogen fuels will affect the useful life of this equipment? If so, please approximate to what extent the equipment's useful life may be changed.

SoCalGas Response 18a:

SoCalGas objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “the equipment.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas evaluated the impacts of hydrogen/natural gas blended fuel for the compressor equipment.

SoCalGas Response 18b:

SoCalGas objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “this equipment.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas does not anticipate using hydrogen blending for the Ventura Compressor Station equipment.

SoCalGas Response 18c:

SoCalGas objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “this equipment.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

50 years

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SoCalGas Response 18d:

SoCalGas objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “this equipment.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

No.

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19. When calculating the sizing of the new VCM equipment, did SoCalGas use natural gas or blended natural gas/hydrogen in its assumptions/calculations? Please provide all such calculations and inputs.

SoCalGas Response 19:

SoCalGas incorporates the General Objections stated above. SoCalGas further objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the phrase “its assumptions/calculations.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Blended hydrogen in the fuel stream does not impact the sizing of any of the drivers, compressors, or auxiliary systems of the VCM project. All equipment is sized to operate with the same performance on either blended or non-blended fuel.

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20. Please provide the confidential responses to the following CPUC Energy Division Data Requests Re: Ventura Compress Station:

- a. Data Request CPUC-Energy Division-3, Follow-Up 2, Q.1, dated June 22, 2021
- b. Data Request CPUC-Energy Division-3, Q.1, Dated June 21, 2021

SoCalGas Response 20a and b:

SoCalGas incorporates the General Objections. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence.

Data Request Number: CEJA-SEU-06
Proceeding Name: A2205015_016 - SoCalGas and SDGE 2024 GRC
Proceeding Number: A2205015_016 2024 GRC
Publish To: California Environment Justice Association
Date Received: 8/29/2022
Date Responded:9/13/2022

22. Please see the Feasibility Study at page 31, which states that with regard to Alternative 1.B, “Based on preliminary analysis, approximately 5 MW of electric power are needed, which would require distribution-level service on one unique power line of at least 15 kW and potentially an onsite substation. It is assumed that this conduit could be placed on existing SCE poles that interconnect with the existing station.”

- a. Has SoCalGas determined whether an onsite substation is needed for Alternative 1.B? If yes, please provide all analysis supporting this determination.
- b. What is the voltage of the potential substation?
- c. Is the cost of the substation included in SoCalGas’ estimate of project costs for Alternative 1B (as set forth in the cost estimate provided in response to Question CEJA-SEU-01, Q.5)? If not, please provide the estimated cost of the substation.

SoCalGas Response 22:

SoCalGas incorporates the General Objections. SoCalGas clarifies that the quote that is cited above incorrectly cites 15kW rather than 16 kV as stated in the Feasibility Study at page 31.

SoCalGas Response 22a:

SoCalGas incorporates the General Objections. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

The Hybrid Option preliminary design included a substation. Since then, discussions with SCE suggested a substation is not needed and a service drop would suffice. This determination is not final until the engineering study is completed by Southern California Edison Company (“SCE”).

Data Request Number: CEJA-SEU-06
Proceeding Name: A2205015_016 - SoCalGas and SDGE 2024 GRC
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SoCalGas Response 22b:

SoCalGas incorporates the General Objections. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Preliminary discussions with SCE suggest a substation is not required.

SoCalGas Response 22c:

SoCalGas incorporates the General Objections. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Yes.

Data Request Number: CEJA-SEU-06

Proceeding Name: A2205015_016 - SoCalGas and SDGE 2024 GRC

Publish To: California Environment Justice Association

Date Received: 8/29/2022

Date Responded: 9/12/2022

21. Please see SoCalGas' response to CEJA-SCG-003, Question 10(d), which states that Total Loaded Project Cost does not include SoCalGas' return on equity. Please provide the total cost of Option 1b (2 electric and 2 gas compressors at the existing site) when accounting for SoCalGas' return on equity. Please provide the methodology and assumptions supporting this response.

SoCalGas Response 21:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Return on equity is a topic within the scope of the CPUC's Cost of Capital proceeding, not the General Rate Case (GRC) proceeding. R.87-11-012 established a Cost of Capital proceeding separate from GRCs for the major California utilities beginning January 1, 1990. Information regarding the CPUC's Cost of Capital proceeding and authorized rates of return is publicly available on the CPUC website.