

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
NORTH-SOUTH PROJECT REVENUE REQUIREMENT
(A.13-12-013)**

(9TH DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

QUESTION 9.1:

9.1. In SoCalGas' updated response to SCGC-06, Question 6.8, SoCalGas defines the Southern System as "the area on its gas transmission system both east of Moreno Station and west of Moreno Station to the City Gates supplying the Los Angeles Basin, including the Rainbow Corridor and San Diego." However, in SoCalGas' response to SCGC-04, Questions 10, 12, 13, 14, and 15 and in SoCalGas' response to SCGC-05, Questions 1 and 2, SoCalGas defined the Southern System as "the area on its gas transmission system east of Moreno Station, including the Rainbow Corridor and San Diego."

9.1.1. Please provide a detailed explanation as to why SoCalGas has changed the definition of the Southern System for the purposes to answering SCGC-06, Q.6.8.

9.1.2. Please answer SCGC-06, Q.6.8 using the same definition of the Southern System that was used in responding to SCGC-04, Questions 10, 12, 13, 14, and 15 and SCGC-05, Questions 1 and 2.

RESPONSE 9.1:

9.1.1 In SCGC-04 and SCGC-05, SCGC requested data for only a relatively few numbers of dates. SoCalGas was able to manually extract this information in a time-consuming process using historical EG records that utilize the initial definition of the Southern System that we provided with our responses. That is how those particular records are kept.

In SCGC-06, Q.6.8, SCGC sought data for a number of years. SoCalGas does not have the time or resources to do a manual compilation of historical operating records for such a large time period. In a good faith effort to provide the requested information, SoCalGas used a different data set to respond to SCGC-06, Q.6.8. But this particular data set uses the somewhat different definition of the Southern System that we provided with our response.

9.1.2 For the reasons provided in Response 9.1.1, SoCalGas is unable to answer SCGC-06, Q.6.8 using the same definition of the Southern System that was used in our response to SCGC-04 and SCGC-5.

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QUESTION 9.2:

9.2. Hypothetically, if the North-South Pipeline project were constructed:

- 9.2.1. If SoCalGas were to receive zero (0) flowing supplies at Ehrenberg, would the project enable SoCalGas to serve customers in the Imperial Valley?
- 9.2.2. If the answer to the previous question is “yes,” please state the maximum volume of gas that SoCalGas could deliver to the Imperial Valley.
- 9.2.3. What part of the system would limit the deliveries to the Imperial Valley customers described in the previous response, that is, would amount of gas that would flow through the North South Pipeline or the amount of gas that SoCalGas could back flowing through Line 2000, or the amount of gas SoCalGas could deliver through Line 6902 and associated lines determine the SoCalGas’ ultimate delivery capability into the Imperial Valley?

RESPONSE 9.2:

- 9.2.1 Yes.
- 9.2.2 SoCalGas would be able to supply the entire need of our Imperial Valley customers. The current capacity of the Imperial Valley System is 200 MMcfd.
- 9.2.3 SoCalGas objects to this question on the grounds that it is ambiguous and confusing. Without waiving these objections, and subject thereto, SoCalGas responds as follows:

As explained in Response 9.2.2, SoCalGas has sufficient pipeline capacity to serve the current level of demand in the Imperial Valley under the proposed hypothetical.