SAN DIEGO GAS & ELECTRIC COMPANY SOUTHERN CALIFORNIA GAS COMPANY LOW OPERATIONAL FLOW ORDER & EMERGENCY FLOW ORDER REQUIREMENTS (A.14-06-021)

(10TH DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

QUESTION 10.1:

10.1. Using the customer imbalance and other information from the Daily Operations Report for January 7, 2014 that was reproduced from the Envoy system as an illustration, please answer the following questions:

pipeline	daf	dof	dbf	dbf1	dbf2
Receipts					
CP - Line 85	32000	49982	59169	59169	59169
CP - North Coastal	46000	47385	59833	59833	59833
CP - Others	20000	28712	24443	24443	24443
El Paso - Ehrenberg	567000	721053	673084	673084	673084
El Paso - Topock	71000	59515	107614	107614	107614
Elk Hills - Wheeler Ridge	0	0	0	0	0
Kern River/Mojave - Kramer Junction	166000	61866	86897	86897	86897
Kern River/Mojave - Wheeler Ridge	201000	120982	128306	128306	128306
North Baja - Blythe	32000	0	0	0	0
PG & E - Wheeler Ridge	60000	30657	59455	59455	59455
Southern Trails - North Needles	39000	21398	0	0	0
TGN - Otay Mesa	0	0	0	0	0
Transwestern - North Needles	308000	184971	281720	281720	281720
Transwestern - Topock	42000	29991	36545	36545	36545
Total Receipts	1586000	1356512	1517066	1517066	1517066
Deliveries					
System Sendout	3273000	3280000	3331000	3408000	3229000
Total Deliveries	3273000	3280000	3331000	3408000	3229000
Net Injections(Withdrawals)	-1647000	-1923488	-1813934	-1890934	-1711934
Injection Capacity		256000	333000	363000	363000
Withdrawal Capacity		3474000	3618000	3618000	3618000
Ending Storage Balance (MCF)	81297000	79373512	77559578	75668644	73956710
Balancing					
Cumulative Customer Imbalance	-24776				
Storage Injection for Customer Balancing(Withdrawal)	-1046448	-1026236	-912432	-989432	-810432
Total Daily Customer Imbalance	-1046448	-1026236	-912432	-989432	-810432
Transmission Fuel Use	4485	3836	4290	4290	4290
Composite Weighted Average Temperature (° F)	53	54	53	52	54

10.1.1. Would the illustrative data trigger a low OFO under SoCalGas/SDG&E's proposed low OFO procedure?

10.1.2. If the answer to Question 10.1.1 is "yes," please state the amount of tolerance that would be expected to be declared under the procedure for the event.

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- 10.1.3. Please provide a complete explanation (including workpapers) of how the tolerance level would be determined under the proposed low OFO procedure in the answer to the previous question.
- 10.1.4. If the answer to Question 10.1.1 is "yes," please indicate which stage of the low OFO procedure would be expected to be adopted for the event.
- 10.1.5. Please provide a complete explanation of how the stage of the low OFO procedure would be determined in the answer to the previous question.

RESPONSE 10.1:

- 10.1.1. Yes
- 10.1.2. Minus 9 to 10%
- 10.1.3. The tolerance would be set close to this percentage: (asset allocated to balancing, MMcfd) / (forecast sendout, MMcfd). For this day, this would have been (340 MMcfd) / 3,300,000 = 10.3%
- 10.1.4. Probably Stage 2.
- 10.1.5. The stage level is set at a level with a noncompliance charge that will be sufficient given the then-current market conditions to incent transportation customers to balance their supplies with their burns. Many points were trading much more than 25 cents (Stage 1's noncompliance charge) above the SCG citygate of \$4.67 for Jan 7: EP Blanco, EP Permian, EP South Mainline, and Opal. In hindsight, a \$1.00 noncompliance charge would have been needed for that day.