

**TRIENNIAL COST ALLOCATION PROCEEDING PHASE 1 APPLICATION
OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES EFFECTIVE JANUARY 1, 2016**

(A.14-12-017)

(DATA REQUEST ORA-TCAP-SCG-12)

QUESTION 1:

It is ORA's understanding that compressor (injection) maintenance is concentrated in the winter months.

- a. Is this understanding correct? Please explain.
- b. Please quantify injection/compressor maintenance by month for the past 5 years. Please specify MMCF/D of injection capacity affected and duration of the maintenance work.
- c. Is the typical injection/compressor maintenance schedule taken into account in SoCalGas and SDG&E's revised injection rights proposal? If so, please explain and quantify. If not, please explain whether and how injection/compressor maintenance could and will affect the availability of injection rights.

RESPONSE 1:

a and c: Yes. The ENVOY postings of available injection take into account compressor maintenance. Since SoCalGas has based its revised injection rights proposal on those postings, the answer is indirectly, yes. Injection capacities can also be slightly affected by other factors such as inventory levels and temperatures.

b: See attached, which shows that the 5-year average summer injection capacity was 770,000 dths/day and that the 5-year average winter injection capacity was 394,000 dths/day. This was primarily caused by a 317,000 dths/day higher level of injection outages in the winter periods vis-à-vis the summer periods.



5 Yr Seasonal
Summary -Storage Mz

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QUESTION 2:

SCG/SDG&E's rebuttal testimony states (in a response to an Indicated Shippers data request):

"During the winter months of November through March, Gas Acquisition on behalf of core procurement customers is required to hold interstate capacity equal to 100% of its forecast average annual customer load. In order to optimize its use of this transportation and balance its supplies with customer load during these months, Gas Acquisition injects delivered supplies into storage when its load falls below its deliveries..."

- a. Please define "interstate capacity" as used in the passage above.
- b. Please provide a reference to all requirements upon Gas Acquisition to hold on behalf of core procurement customers during winter months of November through March interstate capacity equal to 100% of its forecast average annual customer load.
- c. Is Gas Acquisition's practice to "[inject] delivered supplies into storage when its load falls below its deliveries" the result of a regulatory requirement? If so, please provide the appropriate reference. If not, what dictates Gas Acquisition's practice? What other options does Gas Acquisition have in the described scenario ("when its load falls below its deliveries")?

RESPONSE 2:

- a. "Interstate capacity" refers to the capacity rights held by Gas Acquisition on the El Paso, Kern River, Transwestern, and GTN interstate pipelines, together with the capacity rights held on PG&E in connection with the GTN capacity. In the past, Gas Acquisition also has held capacity rights on the Southern Trails interstate pipeline.
- b. Gas Acquisition's current interstate capacity holdings requirements are Pursuant to D.04-09-022 and as updated by Advice Letters 3969, 4350, and 4679.
- c. Gas Acquisition is required on a daily basis to balance its gas deliveries with its load. When its load falls below its deliveries, Gas Acquisition is provided the same system daily balancing rights as all other end-use customers. On days when the System Operator declares a high OFO condition, these balancing rights are limited to 110% of Gas Acquisition's load, whereby deliveries in excess of this volume must be scheduled into Gas Acquisition's storage account to avoid incurring a significant imbalance penalty. Gas Acquisition can also pursue options to reduce its deliveries, such as via gas sales and Secondary Market Services loans. These may not be viable options once the System Operator has declared a high OFO condition, especially if it is declared after Cycle 1.