

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

**APPLICATION FOR AUTHORITY TO
REVISE THEIR CURTAILMENT PROCEDURES**

(A.15-06-020)

(1st DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

GENERAL OBJECTIONS

SoCalGas objects to each question to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges or evidentiary doctrines will be knowingly disclosed.

QUESTION 1.1:

Please provide a working electronic copy of every Excel spreadsheet (or other Excel model) that was used in preparing testimony for this proceeding. As used throughout this data request, working Excel spreadsheets contain all data used and all formulas employed to derive the tables and charts shown in the testimony or otherwise support figures stated or conclusions drawn in the testimony. Working Excel spreadsheets contain all links to other Excel spreadsheets in active format.

RESPONSE 1.1:

The Excel spreadsheets supporting the tables in the testimony of Mr. Watson are being provided concurrently with this response.

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QUESTION 1.2:

Please provide a complete set of workpapers to the testimony in this proceeding.

RESPONSE 1.2:

See Response 1.1.

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QUESTION 1.3:

With respect to Steve Watson's direct testimony at page 6, Table 1, please provide a copy of the document(s) from which each of the figures were obtained as well as a citation to the location of the figures within the documents.

RESPONSE 1.3:

See notes in worksheet supporting Table 1 provided in response 1.1.

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QUESTION 1.4:

1.4. With respect to Steve Watson's direct testimony at page 6-7:

1.4.1. Please specify by name and provide the link on the CAISO website for each of the data files that were downloaded from that website and used in the analysis.

1.4.2. If the data identified in the previous questions is not available through the CAISO website, please provide a copy of each of the data files that SoCalGas/SDG&E obtained from the CAISO for use in this analysis.

1.4.3. In terms of the data described as "non-gas, local sources:"

1.4.3.1. Please identify by name which CAISO files provided the data.

1.4.3.2. Please state in specific terms how these data were identified within those CAISO data files. For example, what field(s) did you examine and what values in the field(s) identified the resource as "non-gas, local sources."

1.4.4. Was the energy produced by non-gas, local sources identified hourly and then subtracted out of the total hourly electric load for the corresponding hour?

1.4.5. If the answer to the previous question is "no," please describe in detail how the "energy produced by non-gas, local sources" was "subtracted out."

1.4.6. Regarding the statement: "we prorated the CAISO non-thermal production by the ratio of Southern California non-gas generation capacity relative to total CAISO non-gas generation capacity:"

1.4.6.1. Please identify by name which CAISO files provided the data and provide the link on the CAISO website for each of the data files that were downloaded from that website and used in the analysis.

1.4.6.2. If the data identified in the previous questions is not available through the CAISO website, please provide a copy of each of the data files that SoCalGas/SDG&E obtained from the CAISO for use in this analysis.

1.4.6.3. Did you perform this prorationing process on an hourly basis?

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1.4.6.4. If the answer to the previous question is “no,” please state the basis upon which the prorationing was performed.

1.4.6.5. Was the ratio of Southern California non-gas generation capacity relative to total CAISO non-gas generation capacity determined on an annual basis only?

1.4.6.6. If the answer to the previous question is “no,” please identify the basis, for example, monthly, weekly, or daily, upon which the “ratio of Southern California non-gas generation capacity relative to total CAISO non-gas generation capacity” was determined.

1.4.7. Please provide a copy of the Excel file(s) containing the “SoCalGas and SDG&E data on the gas usage of all gas electric generators in the CA-ISO region for all 8,760 hours of 2014.”

1.4.8. With respect to the statement: “We assumed that any level of gas EG usage used the most heat efficient units in the CAISO territory.”

1.4.8.1. Please identify the heat rate(s) assumed in the analysis.

1.4.8.2. Please provide a citation to the source of the heat rate identified in the response to the previous question.

1.4.8.3. Did you use the same heat rate for each of the 8760 hours of the year?

1.4.9. Regarding the statement: “We assumed that any reduction in energy output from gas generators would be met with increases in imported electricity—up to the limits of the import capacity of the CAISO.”

1.4.9.1. Please define the term “import capacity” as used in your study.

1.4.9.2. Please identify the source of the CAISO “import capacity” identified for each hour, providing both the source document and a citation to the location(s) within the document(s).

1.4.9.3. Did you do a study to determine how many MW of out-of-state resources would have actually been available for import into the CAISO during each of the winter hours had there been a reduction in gas-fired resources or did you simply assume that the out-of-state resources would have been available?

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- 1.4.9.4. Did you consider the use of natural gas fired generation produced in PG&E's service territory to be part of the "imports"?
- 1.4.9.5. Did you consider generation produced in either the LADWP or IID control areas to be part of the imports?
- 1.4.10. Please provide a copy of any intermediary files that were produced as part of the process of the developing the analysis supporting Table 2.
- 1.4.11. Please provide a copy of the Excel file(s) used to develop Table 2.

RESPONSE 1.4:

1.4.1

SoCalGas/SDG&E downloaded the hourly load data from Velocity Suite; however, load data for SP15 can also be obtained from the CAISO Oasis API. The query name is 'SLD_FCST' and the market run id is 'ACTUAL.' The SP15 load is the sum of the values in the resource name 'SCE-TAC' and the resource name 'SDGE-TAC.' While the CAISO uses an hour end convention, SoCalGas/SDG&E used an hour start convention. Downloading instructions can be found in the following CAISO document:

http://www.caiso.com/Documents/InterfaceSpecifications-OASISv4_2_0.pdf

More information about Velocity Suite can be found on the following website:

<http://new.abb.com/enterprise-software/energy-portfolio-management/market-intelligence-services/velocity-suite>

SoCalGas/SDG&E obtained hourly total California power production by resource type from the CAISO Renewables Watch Bulletin found in the following link:

<http://www.caiso.com/green/renewableswatch.html>

1.4.2

SoCalGas/SDG&E did not receive any data from the CAISO that is not available through their public website.

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1.4.3.1

SoCalGas/SDG&E obtained non-thermal production data for California from the CAISO Renewables Watch Bulletin. The names of the files are 'Daily Renewables output data for' followed by the date.

1.4.3.2

SoCalGas/SDG&E used the fields 'GEOTHERMAL', 'BIOMASS', 'BIOGAS', 'SMALL HYDRO', 'WIND TOTAL', 'SOLAR PV', 'SOLAR TERMAL 'and' HYDRO to determine hourly non thermal California production.

1.4.4

Yes.

1.4.5

Please refer to response 1.4.4.

1.4.6.1

To determine the ratio between production capacity in Southern California and total capacity SoCalGas/SDG&E used plant information and location data downloaded from Velocity Suite. More information about Velocity Suite can be found on the following website:

<http://new.abb.com/enterprise-software/energy-portfolio-management/market-intelligence-services/velocity-suite>

1.4.6.2

Please refer to response 1.4.6.1.

1.4.6.3

Yes.

1.4.6.4

Please refer to response 1.4.6.3

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1.4.6.5

Yes.

1.4.6.6

Please refer to response 1.4.6.5

1.4.7

SoCalGas/SDG&E cannot provide confidential customer data.

1.4.8.1

Number of Plants Generating	Cumulative Gas Usage	Cumulative Capacity	Cumulative Average Heat Rate
1	1,821	262	6,950
2	3,642	524	6,950
3	6,274	900	6,971
4	8,907	1276	6,980
5	10,912	1561	6,990
6	12,917	1846	6,997
7	14,748	2104	7,010
8	16,580	2362	7,020
9	18,412	2620	7,027
10	20,244	2878	7,034
11	22,395	3180	7,043
12	24,547	3482	7,050

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13	26,490	3752	7,060
14	28,433	4022	7,069
15	28,706	4057	7,076
16	29,554	4163	7,099
17	30,354	4263	7,120
18	31,154	4363	7,140
19	31,954	4463	7,160
20	32,754	4563	7,178
21	32,978	4591	7,183
22	33,178	4616	7,188
23	33,418	4646	7,193
24	33,887	4702	7,207
25	34,370	4759	7,222
26	34,607	4786	7,231
27	35,463	4879	7,269
28	36,319	4972	7,305
29	37,174	5065	7,339
30	38,030	5158	7,373
31	38,885	5251	7,405
32	39,741	5344	7,437
33	40,597	5437	7,467
34	41,452	5530	7,496
35		5623	

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	42,308		7,524
36	43,163	5716	7,551
37	44,019	5809	7,578
38	44,875	5902	7,603
39	45,730	5995	7,628
40	46,172	6041	7,643
41	46,633	6089	7,659
42	47,093	6137	7,674
43	47,574	6187	7,689
44	55,036	6962	7,905
45	55,492	7009	7,917
46	62,708	7750	8,091
47	63,203	7800	8,103
48	63,710	7851	8,115
49	65,850	8066	8,164
50	66,318	8113	8,174
51	68,465	8328	8,221
52	68,954	8377	8,231
53	69,424	8424	8,241
54	69,894	8471	8,251
55	70,374	8519	8,261
56	70,864	8568	8,271
57	71,344	8616	8,280

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58	71,834	8665	8,290
59	72,314	8713	8,300
60	72,786	8760	8,309
61	73,280	8809	8,319
62	76,667	9144	8,384
63	81,592	9629	8,474
64	82,076	9676	8,482
65	87,188	10171	8,572
66	87,709	10221	8,581
67	88,230	10271	8,590
68	88,751	10321	8,599
69	89,272	10371	8,608
70	89,793	10421	8,617
71	90,314	10471	8,625
72	90,835	10521	8,634
73	94,344	10857	8,690
74	94,879	10908	8,698
75	95,361	10954	8,706
76	98,845	11286	8,758
77	99,339	11333	8,765
78	102,742	11653	8,817
79	103,914	11763	8,834
80		11812	

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	104,435		8,841
81	104,983	11862	8,850
82	105,521	11911	8,859
83	106,027	11957	8,867
84	106,258	11978	8,871
85	106,808	12028	8,880
86	107,360	12078	8,889
87	107,912	12128	8,898
88	111,452	12448	8,953
89	112,005	12498	8,962
90	114,508	12724	8,999
91	117,011	12950	9,036
92	117,546	12998	9,043
93	118,282	13063	9,055
94	122,031	13393	9,112
95	124,032	13568	9,142
96	125,281	13674	9,162
97	126,510	13778	9,182
98	128,582	13953	9,215
99	132,196	14253	9,275
100	132,464	14275	9,279
101	132,732	14297	9,284
102	133,257	14339	9,293

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103	133,882	14389	9,304
104	134,022	14400	9,307
105	134,161	14411	9,310
106	134,301	14422	9,312
107	134,440	14433	9,315
108	134,580	14444	9,317
109	134,719	14455	9,320
110	134,859	14466	9,322
111	134,998	14477	9,325
112	135,125	14487	9,327
113	135,252	14497	9,330
114	135,379	14507	9,332
115	135,506	14517	9,334
116	135,863	14545	9,341
117	136,385	14586	9,350
118	136,704	14611	9,356
119	137,562	14676	9,373
120	138,420	14741	9,390
121	139,278	14806	9,407
122	140,136	14871	9,423
123	140,433	14893	9,429
124	140,929	14928	9,441
125		15058	

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	142,800		9,483
126	143,607	15112	9,503
127	144,150	15148	9,516
128	144,398	15164	9,522
129	145,387	15225	9,549
130	145,631	15240	9,556
131	146,599	15299	9,582
132	146,834	15313	9,589

1.4.8.2

SoCalGas/SDG&E obtained the heat rate data from Velocity Suite. More information about Velocity Suite can be found on the following website:

<http://new.abb.com/enterprise-software/energy-portfolio-management/market-intelligence-services/velocity-suite>

1.4.8.3

Yes.

1.4.9.1

Import capacity is the assumed upper bound to the amount of power that can be transported into the SP15 from areas outside of the SP15 zone.

1.4.9.2

SoCalGas/SDG&E obtained import capacity data from Velocity Suite. More information about Velocity Suite can be found on the following website:

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1.4.9.3

SoCalGas/SDG&E assumed imports are constrained only by the import capacity.

1.4.9.4

SoCalGas/SDG&E did not distinguish imports by fuel source.

1.4.9.5

Yes.

1.4.10

There are no intermediary files.

1.4.11

See Response 1.1.

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QUESTION 1.5:

1.5. With respect to Steve Watson's direct testimony at page 8:

1.5.1. Please provide a copy of any intermediary files that were produced as part of the process of the developing the analysis supporting Table 3.

1.5.2. Please provide a copy of the Excel file(s) used to develop Table 3.

1.5.3. With respect to the statement "SoCalGas and SDG&E expect gas transmission constraints to appear in winter months, not summer months. If a constraint does arise during the summer, it is unlikely that SoCalGas and SDG&E would need a more than 30% cut in EG demand to maintain gas service to all other customers."

1.5.3.1. Please provide a history of curtailments on the SoCalGas and SDG&E systems for the past ten years, including the date of the curtailment, the amount of load curtailed, the reason for the curtailment, whether the curtailment was caused by gas supply-related or SoCalGas/SDG&E delivery-related issues, and the location of the curtailment.

1.5.3.2. Please breakdown the history of curtailments that is provided in response to the previous question showing which of the proposed local service zones that are identified in Mr. Bisi's testimony were affected by each curtailment.

RESPONSE 1.5:

1.5.1 and 1.5.2

See Response 1.1 and alter input from 60% cut to 30% cut.

1.5.3.1 and 1.5.3.2

See the table on the following page.

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Date of Event	Type of Event	Utility	Local Service Areas	Curtailment Volume	Supply/Capacity Related
Feb 3 - 7, 2011	Localized	SCG/SDGE	Southern System - East of Moreno; Southern System - South of Moreno	200 MMCF/day	Capacity
				All SDGE noncore were curtailed. If a customer needed to run, they had to declare an "Operating Emergency" and ensure their marketers would deliver enough at the Otay Mesa delivery point to cover their usage during the curtailment to avoid penalties.	Capacity
Oct 1-3, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Oct 8-9, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Oct 15-16, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Oct 22-23, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Oct 29-30, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Nov 5-6, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Nov 12-13, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Nov 19-20, 2011	Planned Maintenance	SDGE	Southern System - South of Moreno	Same as above	Capacity
Dec 12, 2012 – Jan 7, 2013	Localized	SCG	North Valley System	No Estimate Available	Capacity
5-Dec-13	Curtailment of OSD Service	SCG	NA	No Estimate Available	Supply
Dec 6 - 11, 2013	Standby Procurement Services	SCG/SDGE	Systemwide	No Estimate Available	Supply
Feb 6 - 10, 2014	Standby Procurement Services	SCG/SDGE	Systemwide	No Estimate Available	Supply
Feb 6 - 10, 2014	Emergency Localized	SCG/SDGE	Southern System - East of Moreno; Southern System - South of Moreno	300 MMCF/D	Supply
Feb 6 - 10, 2014	Emergency	SCG/SDGE	Systemwide		
Nov 3 - 4, 2014	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 25 MMCF/H	Capacity
Jan 27 - 28, 2015	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 22.08 MMCF/H	Capacity
Feb 18 - 19, 2015	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
24-Feb-15	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
Mar 7 - 31, 2015	Planned Maintenance	SCG	Coastal System	No Estimate Available	Capacity
Apr 21 - 22, 2015	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 13.25 MMCF/H	Capacity
27-Apr-15	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
Apr 30 – May 1, 2015	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
4-May-15	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
May 21 - 23, 2015	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
May 29 - 31, 2015	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 22.08 MMCF/H	Capacity
May 26 - 28, 2015	Planned Maintenance	SCG	Southern System - West of Moreno	Affected Noncore customer was curtailed 100%	Capacity
Jun 6 - 7, 2015	Planned Maintenance	SCG	South LA Basin	Affected Noncore customers were curtailed. The area affected was held to the available capacity of 13.25 MMCF/H	Capacity
Jun 13 - 14, 2015	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
June 26 - 27, 2015	Planned Maintenance	SCG	Coastal System	Affected Noncore customer was curtailed 100%	Capacity
30-Jun-15	Emergency Localized	SCG	South LA Basin	20 MMCF/H	Capacity
1-Jul-15	Emergency Localized	SCG	South LA Basin	20 MMCF/H	Capacity
Oct 5-6, 2015	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 12.5 MMCF/H	Capacity
Oct 13-14, 2015	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
21-Oct-15	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
Oct 19-20, 2015	Planned Maintenance	SCG	South LA Basin	Affected Noncore customer was curtailed 100%	Capacity
22-Oct-15	Planned Maintenance	SCG	South LA Basin	Same as above	Capacity
27-Oct-15	Planned Maintenance	SCG	South LA Basin	Noncore customers were curtailed. The area affected was held to the available capacity of 22.08 MMCF/H	Capacity
3-Nov-15	Planned Maintenance	SCG	Southern System - West of Moreno	Affected Noncore customer was curtailed 100%	Capacity
3-Nov-15	Planned Maintenance	SCG	South LA Basin	Affected Noncore customer was curtailed 100%	Capacity

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QUESTION 1.6:

1.6. With respect to the analysis presented in Tables 2 and 3:

1.6.1. Did Mr. Watson complete this analysis for any other year beside 2014?

1.6.2. If the answer to the previous question is “yes,” please identify the year(s) evaluated and provide a copy of the files used to develop the analysis for those year(s).

1.6.3. Does Mr. Watson believe that 2014 is a representative year?

1.6.4. If the answer to the previous question is “yes,” please explain in detail why Mr. Watson believes that 2014 is a representative year.

RESPONSE 1.6:

1.6.1 No

1.6.2 N/A

1.6.3 The question of representativeness gets into questions of forecasting that include weather and climate change and are beyond the scope of Mr. Watson’s testimony.

1.6.4 See 1.6.3