

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

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

(A.15-06-020)

(17TH DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

QUESTION 17.1:

Please derive the Receipt Points (Flowing Supplies) figure of 3565 MMcf/d shown in columns 1-3 in Table 1 and 3325 MMcf/d shown in column 4 in Table 1 using the capacity of the individual receipt points listed in SoCalGas Schedule G-TBS.

RESPONSE 17.1:

3565 MMcf/d is comprised of 800 MMcf/d delivered at North Needles, 240 MMcf/d delivered at Topock, 550 MMcf/d delivered at Kramer Junction, 1010 MMcf/d delivered at Ehrenberg, 200 MMcf/d delivered at Otay Mesa, and 765 MMcf/d delivered at Wheeler Ridge. 3325 MMcf/d assumes an outage on Line 3000, which eliminates all capacity at Topock, and 240 MMcf/d of system capacity.

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QUESTION 17.2:

What is the maximum operating pressure for Line 225?

RESPONSE 17.2:

SoCalGas objects to this request on the grounds that it seeks sensitive and confidential system information.

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QUESTION 17.3:

What is the maximum throughput capacity of Line 225 during 1-in10 peak day conditions? Please provide the response in terms of maximum hourly capacity as well as average hourly capacity over a 24 hour period.

RESPONSE 17.3:

Line 225 has firm capacity to receive approximately 1600 MMcfd of supply. During periods of high demand, approximately 1765 MMcfd can be transported.

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QUESTION 17.4:

Please explain in detail the circumstances under which there is “150 MMcfd of stranded gas at Honor Rancho” as stated on page 20.

RESPONSE 17.4:

Please refer to the Aliso Canyon Winter Risk Assessment Technical Report at page 20: “Both Honor Rancho and the Wheeler Ridge Zone are on the same pipeline, forcing both supply points to compete for limited pipeline capacity. When the Wheeler Ridge Zone is operating at 100 percent utilization, Honor Rancho is limited to a maximum withdrawal of 835 MMcfd in the 5.2 Bcfd scenario.” This is prudent system design; having excess delivery capacity into the system relative to its take-away capacity allows for improved operating and market flexibility. This is evident most recently on the Northern System with the Line 3000 outage – the excess receipt capacity at the Kramer Junction receipt point reduced the Northern System capacity loss from 540 MMcfd to only 240 MMcfd. Should pipeline supply to the Wheeler Ridge zone be impacted, Honor Rancho has sufficient withdrawal capacity to offset that shortfall.

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QUESTION 17.5:

- 17.5. With respect to the statement made on page 20: “Demand on the system exceeds supply during the morning and evening peak periods. All available supply is fully utilized during these periods. After the peak demand periods, Honor Rancho supplies must be reduced from full withdrawal rate to avoid an over-pressure condition, limiting the daily volume to 835 million cubic feet. Both Honor Rancho and the Wheeler Ridge Zone are on the same pipeline, forcing both supply points to compete for limited pipeline capacity. When the Wheeler Ridge Zone is operating at 100 percent utilization, Honor Rancho is limited to a maximum withdrawal of 835 MMcfd in the 5.2 Bcfd scenario.”
- 17.5.1. Please identify all of the locations on the SoCalGas system where would the “over-pressure condition” occur if the Honor Rancho supplies were not “reduced from full withdrawal rate.”
- 17.5.2. Please identify the hourly rate of withdrawal from Honor Rancho that corresponds to the statement: “All available supply is fully utilized during these periods.”
- 17.5.3. Please identify the hourly rate of withdrawal from Honor Rancho that corresponds to the statement: “After the peak demand periods, Honor Rancho supplies must be reduced from full withdrawal rate to avoid an over-pressure condition...”
- 17.5.4. Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the statement: “limiting the daily volume to 835 million cubic feet.”
- 17.5.5. Is the hourly profile described in response to Q.17.5.3 correct assuming that the Wheeler Ridge Zone is operating at 100 percent utilization?
- 17.5.6. If the answer to the previous question is “no,” please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that would be possible assuming that he Wheeler Ridge Zone is operating at 100 percent utilization.

RESPONSE 17.5:

- 17.5.1 Facilities located in the Valley System and North Valley System Local Service Zones.
- 17.5.2 41.7 MMCFH

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17.5.3. Please refer to the data prepared in response to question 17.5.4 of this data request.

17.5.4. Please refer to the data below.

Hour	Honor Rancho Withdrawal (MMcfd)
6:00 AM	1000
7:00 AM	1000
8:00 AM	780
9:00 AM	780
10:00 AM	780
11:00 AM	780
12:00 PM	780
1:00 PM	780
2:00 PM	780
3:00 PM	780
4:00 PM	780
5:00 PM	780
6:00 PM	1000
7:00 PM	1000
8:00 PM	1000
9:00 PM	1000
10:00 PM	780
11:00 PM	780
12:00 AM	780
1:00 AM	780
2:00 AM	780
3:00 AM	780
4:00 AM	780
5:00 AM	780

17.5.5. Yes.

17.5.6. N/A

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QUESTION 17.6:

- 17.6. With respect to the statement on pages 24-25: “Figure 9 illustrates the supply and demand profiles for the 4.7 Bcfd simulation. Supply from all storage fields (without Aliso Canyon) is maximized during the morning peak, and then is reduced throughout the day to prevent an over-pressure situation. This process allows the system operator flexibility to meet the peak demand times on the system, which prevents minimum operating pressure situations. This is also why Honor Rancho supplies are listed at 403 MMcfd in Table 1, even though the field is capable of 1,000 MMcfd. While that maximum rate was available at the storage field and was used at times, more than 403 MMcf of supply was not required out of Honor Rancho over the course of the day to meet the reduced level of demand that could be supported.”
- 17.6.1. Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 403 MMcf/d in Table 1, Column 2.
- 17.6.2. Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 426 MMcf/d in Table 1, Column 3.
- 17.6.3. Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 541 MMcf/d in Table 1, Column 4.

RESPONSE 17.6:

This request seeks information regarding the data presented in Table 1 of the Aliso Canyon Winter Risk Assessment Technical Report. During the joint agency integrated energy policy report workshop held on August 26, 2016, SCGC expressed concerns about “something” at Honor Rancho that would limit the withdrawal from the storage field in simulations representing 4.7 and 4.5 BCFD sendout conditions. This “something” is explained in the Technical Report. The second footnote to Table 1 states in part: “figures represent daily volume needed to balance lower demand to manage operational pressures in the hydraulic analysis.” Additionally on page 24-25: “more than 403 MMcf of supply was not required out of Honor Rancho over the course of the day to meet the reduced level of demand that could be supported. SoCalGas could also have chosen to reduce supply from Playa del Rey, La Goleta, the interstate pipelines, or any combination of these, but the results of the assessment would be unchanged.”

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Simply put, a sendout of 4.7 or 4.5 BCFD does not require same level of supply necessary to support a sendout of 5.2 BCFD. Because the hydraulic simulations kept the level of pipeline supply constant at 100% utilization, storage supplies had to be reduced to balance supply with demand, and SoCalGas chose to reduce only Honor Rancho storage supplies, rather than supplies from La Goleta or Playa del Rey (or some combination of all three fields), for simplicity and expediency in the simulation.

In preparing this data response, SoCalGas has found an inaccuracy in the Technical Report. While a withdrawal rate of 1000 MMcfd (or 41.7 MMCFH) was available for use from Honor Rancho in the 4.7 and 4.5 BCFD simulations, that hourly level was not necessary to meet system demand given the pipeline supply assumptions used. Therefore, the statement on page 24-25 that the “maximum rate was available at the storage field and was used at times” should simply say that the “maximum rate was available at the storage field.” Further, the phrase “fully utilized at peak times” in the second footnote to Table 1 should be interpreted as meaning that no restrictions were placed on the maximum withdrawal rate available at Honor Rancho in the simulation, rather than an indication that a rate of 41.7 MMCFH was achieved.

17.6.1 Please refer to the table below.

Honor Rancho Withdrawal (MMcfd)			
Hour	403 MMcfd	426 MMcfd	541 MMcfd
6:00 AM	850	800	800
7:00 AM	850	800	800
8:00 AM	850	800	800
9:00 AM	485	800	800
10:00 AM	485	800	800
11:00 AM	485	580	800
12:00 PM	485	580	580
1:00 PM	485	580	580
2:00 PM	485	580	580
3:00 PM	280	580	580
4:00 PM	280	580	580
5:00 PM	280	580	580
6:00 PM	280	380	580
7:00 PM	280	380	580
8:00 PM	280	380	580
9:00 PM	280	180	580
10:00 PM	280	180	580
11:00 PM	280	180	580

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12:00 AM	280	80	280
1:00 AM	280	80	280
2:00 AM	280	80	280
3:00 AM	280	80	130
4:00 AM	280	80	130
5:00 AM	280	80	130

17.6.2 Please refer to the data prepared in response to question 17.6.1 of this data request.

17.6.3 Please refer to the data prepared in response to question 17.6.1 of this data request.