

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.1:

11.1 The following statement appears at pages 18-19 in the November 28, 2018

Supplemental Testimony of Sharim Chaudhury, David Mercer, and Paul Borkovich:

Conversely, many noncore customers rely upon real time measurement information to monitor their operations, including many of those represented by the intervenors in this proceeding. Real-time usage data has been available to noncore customers and their balancing agents entering into Data Access agreements with SoCalGas in various forms for years. Previous day usage data has also been available to noncore customers and their balancing agents on Envoy in time for OFO Day scheduled quantity adjustments traded on the next business day. Previous day usage information has been provided to noncore customers and their balancing agents on the SoCalGas EBB since the early 1990's. Neither option is available to core balancing agents at this time.

Noncore customers can also obtain real-time measurement data contemporaneous with their actual usage if they install an interconnection with their SoCalGas meter or install their own check-meter. Accessing this data by noncore customers themselves or through their respective balancing agents provides these customers the opportunity to adjust their usage or scheduled deliveries during the Gas Day in order to comply with balancing requirements.

Please identify the witness who is offering this testimony.

RESPONSE 11.1:

Paul Borkovich.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.2:

The offering witness says “Real-time usage data has been available to noncore customers and their balancing agents entering into Data Access agreements with SoCalGas in various forms for years.” In the Southern California Gas Company (“SoCalGas”) and San Diego Gas and Electric Company (“SDG&E”) (jointly, “Applicants”) Response 9.1.3 to the Southern California Generation Coalition (“SCGC”) and Indicated Shippers (“IS”) (jointly, “SCGC/IS”) Ninth Data Request, the Applicants stated: “Customers that wish to obtain an onsite interconnection are required to execute and comply with a Measurement Data Access Device Agreement and an Agreement for Collectible Work – D Ticket.” Are the “Data Access agreements” referenced by the offering witness the same as the “Measurement Data Access Device Agreement and an Agreement for Collectible Work – D Ticket” that are referenced in Response 9.1.3 to SCGC/IS’s Ninth Data Request?

- 11.2.1 If the answer to question 11.2 above is “yes,” please provide a link to the form “Measurement Data Access Device Agreement” on the SoCalGas website, and please provide the form agreement itself.
- 11.2.2 If the answer to question 11.2 is “yes,” please confirm that the “Agreement for Collectible Work – D Ticket” is posted on the SoCalGas website at <https://www.socalgas.com/regulatory/tariffs/tariffs-samples.shtml> as “Sample Form Agree Coll Work, Contract - Agreement for Collectible Work, Form 1603.” Alternatively, if the form “Agreement for Collectible Work – D Ticket” is not posted on the SoCalGas website as “Sample Form Agree Coll Work, Contract - Agreement for Collectible Work, Form 1603,” please provide a link to the form “Agreement for Collectible Work – D Ticket” on the SoCalGas website, and please provide the form Agreement for Collectible Work – D Ticket itself.
- 11.2.3 If the answer to question 11.2 is “no,” please provide a link to the “Data Access agreements” referenced by the offering witness, and please provide the form agreement itself.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

**DATE RECEIVED: 12-3-18
DATE RESPONDED: 12-10-18**

RESPONSE 11.2:

11.2 Yes.

11.2.1 The Measurement Data Access Device Agreement is not a tariff form agreement and is not available on the SoCalGas website. A copy of the form agreement is attached.



Measurement Data
Access Agreement.p

11.2.2 The link provided is correct.

11.2.3 N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.3:

Does SoCalGas know how many SoCalGas noncore customers have “Data Access agreements” in effect? (Please note: in Response 9.1.6 to SCGC/IS’s Ninth Data Request, SoCalGas and SDG&E said: “SoCalGas and SDG&E do not have systems in place to track Measurement Device Agreements across both companies.” Accordingly, the instant question does not ask for the number of Data Access agreements “across both companies” but is restricted to one company, SoCalGas.)

RESPONSE 11.3:

This exact number is unknown. Data Access was provided in many cases when the customer’s Big GEMS measurement facility was first installed. SoCalGas does not have formal systems in place to track Measurement Data Access Device Agreements. However, based on an informal survey, approximately, 85% of SoCalGas’ 20 MW and above electrical generation (EG) customers, excluding SDG&E generators that represents approximately 3.5 Bcf/d in connected load has data access to SoCalGas measurement.

In addition, for SoCalGas, approximately 114 noncore customer meters (Big GEMS measurement facility sites) representing an average load of 1.18 MMDth/day in 2017 have the capability to provide data access to the customer. For SDG&E, approximately 26 noncore customer meters representing an average load of 0.14 MMDth/day have this capability as well.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.4:

If the answer to the previous question 11.3 is “yes,” please provide the number of customers, and please provide the aggregate average annual daily deliveries to those customers.

RESPONSE 11.4:

Please see Response 11.3 for the approximate number of SoCalGas noncore customers capable of receiving real time measurement data and their aggregate average annual daily deliveries.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.5:

Does SDG&E know how many SDG&E noncore customers have “Data Access agreements” in effect? (Please note: in Response 9.1.6 to SCGC/IS’s Ninth Data Request, SoCalGas and SDG&E said: “SoCalGas and SDG&E do not have systems in place to track Measurement Device Agreements across both companies.” Accordingly, the instant question does not ask for the number of Data Access agreements “across both companies” but is restricted to one company, SDG&E.)

RESPONSE 11.5:

This exact number is unknown.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.6:

If the answer to question 11.4 is “yes,” please provide the number of customers, and please provide the aggregate average annual daily deliveries to those customers.

RESPONSE 11.6:

Please see Response 11.3 for the approximate number of SDG&E customers capable of receiving real time measurement data and their aggregate average annual daily deliveries.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.7:

Does SoCalGas know how many SoCalGas noncore customers have “check meters?”

RESPONSE 11.7:

No.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.8:

If the answer to the previous question is “yes,” please provide the number of customers, and please provide the aggregate average annual daily deliveries to those customers.

RESPONSE 11.8:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.9:

Does SDG&E know how many SDG&E noncore customers have “check meters?”

RESPONSE 11.9:

No.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.10:

If the answer to the previous question is “yes,” please provide the number of customers, and please provide the aggregate average annual daily deliveries to those customers.

RESPONSE 11.10:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.11:

When the offering witness refers to “balancing agents,” is the offering witness referring to “Contracted Marketer” as defined in SoCalGas Rule 1? (“Contracted Marketer: Contracted Marketers are individuals, companies or consortiums that arrange for natural gas procurement-related activities on behalf of noncore customers. Contracted Marketers must enter into a contract with SoCalGas and meet certain credit requirements. They must comply with Rules 30 and 35 and all other tariffs which address the transportation and management of customer-owned gas.”)

RESPONSE 11.11:

Yes, contracted marketers are balancing agents. See SoCalGas Rule No. 30.G.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

**DATE RECEIVED: 12-3-18
DATE RESPONDED: 12-10-18**

QUESTION 11.12:

If the answer to the previous question is “no,” please provide the offering witness’s definition of “balancing agents.”

RESPONSE 11.12:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.13:

If a customer enters into “Data Access agreements” with SoCalGas and the customer has a “balancing agent,” does the “balancing agent” have direct access to “real-time measurement data contemporaneous with [the customer’s] actual usage” without getting the information from the customer?

RESPONSE 11.13:

SoCalGas and SDG&E object to this question on the grounds that it is vague and ambiguous as to the term “direct access.” Subject to and without waiving this objection, SoCalGas and SDG&E respond as follows: There are no limitations placed on noncore customers under the Data Access Agreement from setting up the automatic transmission of real time measurement data to their respective balancing agents.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.14:

Please explain the difference between a “balancing agent” as the term is used by the offering witness and an “agent” that is authorized by a customer through an Authorization to Receive Customer Information or Act on a Customer’s Behalf, Form 8206.

RESPONSE 11.14:

Agents do not assume balancing responsibility for their customers. Balancing agents do assume this responsibility.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.15:

Please explain the difference between a “balancing agent” as the term is used by the offering witness and an “agent” that is authorized by a customer through a Nomination and/or Trading Authorization for Receipt Point Master Agreement and/or Storage Contract, Form 9924?

RESPONSE 11.15:

There is no relation. No balancing service is offered for Backbone Transportation Service.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.16:

Please provide all evidence in support of the offering witness's statement that "Previous day usage data has also been available to noncore customers and their balancing agents on Envoy in time for OFO Day scheduled quantity adjustments traded on the next business day."

- 11.16.1 Does the offering witness contend that the previous day usage data is provided directly to noncore customers but not balancing agents so that so that a balancing agent has to get the previous day's usage from the customer that is served by the balancing agent?
- 11.16.2 Alternatively, does the offering witness contend that the previous day usage is provided directly and simultaneously by SoCalGas/SDG&E to noncore customers and their balancing agents, if any?

RESPONSE 11.16:

- 11.16 Measurement data for noncore transportation customers has been provided on the SoCalGas Electronic Bulletin Board since 1994.
- 11.16.1 SoCalGas and SDG&E object to this question on the grounds that it is vague and ambiguous as to the phrase "has to get." Subject to and without waiving this objection, SoCalGas and SDG&E respond as follows: No. Balancing agents can login to Envoy and access the data directly for their customers.
- 11.16.2 Yes. See the referenced testimony and Response 11.16.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.17:

Please provide a copy of the August 2018 SoCalGas Advanced Meter Semiannual Report.

RESPONSE 11.17:

There is no August 2018 SoCalGas Advanced Meter Semiannual Report. As explained in SoCalGas' February 2018 Advanced Meter Semiannual Report, Introduction, "Since the last Conservation Campaign was completed in 2016-2017 and installation of SoCalGas' Advanced Meter project is nearly complete, the attached Report represents the last to be submitted to the Commission pursuant to D.10-04-027."¹

¹ https://socalgas.com/regulatory/documents/a-08-09-23/SoCalGas_Advanced_Meter_Semi_Annual_Report_FEB2018.pdf.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.18:

Please explain why the August 2018 SoCalGas Advanced Meter Semiannual Report is not posted on the SoCalGas website as are the previous SoCalGas Advanced Meter Semiannual Reports.

RESPONSE 11.18:

Please see Response 11.17.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.19:

Please provide a copy of any data response to a data request made by anyone other than SCGC/IS that has not been posted to the SoCalGas website.

RESPONSE 11.19:

All SoCalGas and SDG&E responses to data requests from parties other than SCGC/IS are posted to the SoCalGas website. In responding to this question, SoCalGas became aware that certain responses to SCGC/IS' data requests had not been posted to the SoCalGas website. SoCalGas will correct this issue.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.20:

Regarding the response to ALJ Ruling Questions 2 and 5, please confirm that the total number of meters that are able to have an MTU installed or have already had an MTU installed as of November 5, 2018 is 5,984,998 (5,960,811 + 4,122 + 20,065).

RESPONSE 11.20:

SoCalGas and SDG&E object to this question to the extent it is vague and ambiguous as to the phrase “are able to have an MTU installed.” Subject to and without waiving this objection, SoCalGas and SDG&E respond as follows: To clarify, 5,960,811 represents the number of MTUs with an installation date of November 5, 2018, or earlier, as of November 14, 2018 (the date SoCalGas prepared the data in order to respond to ALJ Ruling Question 2). The amounts of 4,122 and 20,065 represent customer counts for those respective groups as of November 14, 2018. These customer counts typically change daily for several reasons including the addition of new customers, new meter set installations, customer requests, data fixes, and retired facilities. Furthermore, while there are no plans to install MTUs for Opt-Out customers, customers may decide to Opt-In. These customer counts also do not include any noncore customers with SoCalGas advanced meter MTUs installed.

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

**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

**DATE RECEIVED: 12-3-18
DATE RESPONDED: 12-10-18**

QUESTION 11.21:

Please provide a breakdown of the total number of meters discussed in response to the previous question between residential and non-residential customers.

RESPONSE 11.21:

As explained in Response 11.20, customer meter counts typically change daily. The table below provides updated data as of December 4, 2018.

	Residential	Non-Residential	Total
MTUs Not Installed	2,704	422	3,126
MTUs Installed	5,694,289	271,699	5,965,988
Opt-Out	19,874	-	19,874
TOTAL	5,716,867	272,121	5,988,988

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.22:

Please identify the number of noncore customers, if any, that are included in the response to the previous question.

RESPONSE 11.22:

None. Noncore customer meter counts are not included.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.23:

With regard to the 20,065 customers designed as Advanced Meter “opt outs” on page 5 of the Supplemental Testimony, are all of these customers referred to as “opt-out” customers actively enrolled in the Opt-Out Program, that is, have they actually paid the initial fee, and do they continue to pay the monthly ongoing cost of their “opt-out” status?

RESPONSE 11.23:

SoCalGas and SDG&E object to the question on the grounds that it is vague and ambiguous as to the phrases “customers designed as Advanced Meter ‘opt outs’” and “actively enrolled.” Subject to and without waiving these objections, SoCalGas and SDG&E respond as follows: The customer count of 20,065 represents the number of SoCalGas customers enrolled in the Opt-Out program as of November 14, 2018 that were receiving a bill that included Opt-Out fees.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.24:

If the answer to the previous question is “no,” please identify how many of the customers identified on page 5 as “opt-out” customers are waiting to be placed into “opt-out” status and have not yet paid the initial fee.

RESPONSE 11.24:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.25:

Please state the number of customers as of November 5, 2018 that had requested to be removed from the Opt-Out Program or removed from the “pending enrollment” in the Opt-Out Program.

RESPONSE 11.25:

SoCalGas can provide readily available information as of October 31, 2018. At that time, the total count of customers that had been terminated or were in pending termination status from the Opt-Out program was 58,679.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.26:

With respect to the statement in footnote 2 (“For clarification, the 98.57% referenced in ALJ Ruling Question 1 refers to the percentage of core customer monthly usage which was billed using once per month AMI reads.”) please clarify what is meant by “monthly usage which was billed using once per month AMI reads” since the AMI system produces hourly reads.

RESPONSE 11.26:

Although each of SoCalGas’ AMI-enabled meters provides reads for cumulative usage on an hourly basis, only one of these reads is used each month for billing purposes for each customer. The difference between this single hourly read for the current billing month and that of the prior billing month is used to calculate the gas usage to be billed for each customer. The referenced 98.57% is the percentage of the aggregated core billed monthly gas usage that is captured by SoCalGas’ AMI-enabled meters.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**APPLICATION REGARDING FEASIBILITY OF INCORPORATING
ADVANCED METER DATA INTO THE CORE BALANCING PROCESS
(A.17-10-002)**

**(11th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION AND
INDICATED SHIPPERS)**

DATE RECEIVED: 12-3-18

DATE RESPONDED: 12-10-18

QUESTION 11.27:

In response to ALJ Ruling Question 1, the offering witness says:

As of April 2018, SoCalGas was able to successfully collect a relatively high percentage of its core usage data through its AMI system. A minimum of one year of historical AMI data is required to estimate the Daily Load Forecasting Model (DLFM) parameters because data collected for a period of less than one year would miss information regarding gas usage during seasons, months, or holidays, making estimations of corresponding calendar effects inadequate. Accordingly, SoCalGas will have collected the minimum history of data required for use in an AMI-based version of the DLFM in early 2019.

Please confirm that “SoCalGas will have collected the minimum history of data required for use in an AMI-based version of the DLFM” by April 1, 2019. If SoCalGas cannot provide such confirmation, please explain why the confirmation cannot be made and provide the date in “early 2019” when “SoCalGas will have collected the minimum history of data required for use in an AMI-based version of the DLFM.”

RESPONSE 11.27:

SoCalGas anticipates that it will have collected the minimum history of data required for use in an AMI-based version of the DLFM by April 1, 2019. Once this data has been collected, additional activities are required to incorporate the AMI data into the forecasting process. These activities include data validation, model specification and development, model validation and testing, and updating the automated forecasting process and tracking. As stated in its Supplemental Testimony, “SoCalGas expects to develop and implement a core forecasting process based on SoCalGas’ historical AMI data by July 1, 2019.”²

² Supplemental Testimony of Sharim Chaudhury, David Mercer, and Paul Borkovich, p. 2.