

EDF DATA REQUEST
EDF-SCG-004
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: APRIL 24, 2018
DATE RESPONDED: MAY 8, 2018

- 4.1 With respect to So Cal Gas' Response to Data Request SCGC-SEU-002, Question 2.2.4;
- a) Does every DCU's coverage area have MTUs transmitting during every one of the 6 data transmittal cycles (i.e., S1, S2, S3, S4, S5, and S6?
 - b) When the "communication module" is "assigned a schedule shortly after the module is provisioned and communicating to the network"; can a module's "schedule" be later assigned a different "schedule"?

SoCalGas Response 4.1:

SoCalGas objects to Question 4.1 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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- 4.2 With respect to So Cal Gas' Response to Data Request SCGC-SEU-002, Question 2.2 5;
- a) Approximately how many measurement related transmissions per hour occur from the MTUs?

SoCalGas Response 4.2:

SoCalGas objects to Question 4.2 under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought by this request is not relevant to the scope of the subject matter involved in the pending proceeding and the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence within the scope of the pending proceeding.

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4.3 Reference is made to Appendix B of SCG-02-Revised

- a) With respect to the 7X7 Matrix, the Operational and Reliability row, where would SCG place the Aliso Canyon leak event?
- b) With respect to the 7X7 Matrix, the Operational and Reliability row, where would SCG place the loss of capacity in the Northern Zone on the Backbone Transmission System (BTS) from Topock and/or Needles to the Los Angeles Area?
- c) With respect to the 7X7 Matrix, the Operational and Reliability row, where would SCG place the loss of capacity in the Southern Zone on the Backbone Transmission System (BTS) from Ehrenberg and/or Bythe to the Los Angeles Area?

SoCalGas Response 4.3:

- a) SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054.
- b) SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope. SoCalGas also objects to this request on the grounds that it calls for speculation and presents an incomplete hypothetical.
- c) See 4.3(b).

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4.4 Reference is made to Critical Notice Posted on ENVOY March 28, 2018 at 1:37 PM entitled “Southern Zone Capacity Reduction” (excerpted below) and its relevance to Appendix B of SCG-02-Revised:

- a) With respect to this very large loss of capacity for an indefinite period (as stated in the notice) where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal’s ability to serve peak day demand?
- b) With respect to this very large loss of capacity for an indefinite period (as stated in the notice) where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity as a resource to meet average day demand?

Copy of Critical Notice posted by SoCal Gas on ENVOY
Message

Subject: Southern Zone Capacity Reduction
Category: Critical Notices
Author: Vahan Chaparyan
Date Posted: 03/28/2018 01:36:30 PM
Attachment(s):

Beginning gas day March 29, 2018, the Southern Zone capacity will be reduced indefinitely due to the expiration of a right-of-way agreement for a SoCalGas pipeline across federal lands held in trust for the Morongo Band of Mission Indians. The Blythe Subzone will be revised to 980 MMcf/d and Otay Mesa receipt point will remain unchanged at 400 MMcf/d. The Southern Zone receipt capacity will be reviewed daily based on current system conditions. These changes will be reflected in the Capacity Utilization screen accordingly.

Please continue to monitor ENVOY for additional updates.

<https://scgenvoy.sempa.com/index.html#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D1%26rand%3D277>

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SoCalGas Response 4.4:

- a) SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and lacks foundation. SoCalGas also objects to this request on the grounds that it calls for speculation and presents an incomplete hypothetical.
- b) See 4.4(a).

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4.5 Reference is made to SCG-07 at MAB-10

a) At lines 13-15 SoCal states “Multiple segments of transmission pipeline in SoCalGas’ Southern System will be replaced to accommodate class location changes due to ongoing residential and commercial development in the vicinity of the natural gas transmission pipeline.” Is relocation of SoCal line ZZZ within the Morongo Indian Reservation referred to here as one or more of the “[m]ultiple segments” of the “Southern System’...that..’will be replaced”?

b) With respect to same, does SoCal Gas have any plans to reduce the capacity available on the BTS from Blythe as part of this possible “replacement”?

(i) If so, where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal’s ability to serve peak day demand?

(ii) If so, where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal’s ability to serve average day demand?

SoCalGas Response 4.5:

a. No.

b. No, SoCalGas does not have any plans to reduce the capacity available on the BTS from Blythe as part of the replacements referred to in the cited testimony.

i. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable.

ii. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable.

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4.6 Reference is made to SCG-07 at MAB-10:14 and its relevance to Appendix B of SCG-02-Revised

a) With respect to any of the enumerated replacement(s) and/or relocations, does SoCal Gas have any plans to reduce the capacity available on the BTS from either Blythe or Topock as part of these enumerated projects?

(i) If so, where on SoCal's 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal's ability to serve peak day demand?

(ii) If so, where on SoCal's 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal's ability to serve average day demand?

SoCalGas Response 4.6:

a. No, SoCalGas does not have any plans to reduce the capacity available on the BTS from Blythe or Topock as part of these enumerated projects.

i. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable.

ii. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable.

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4.7 Reference is made to SCG-07 at MAB-13:14: and in part to its relevance to Appendix B of SCG-02-Revised

- a) SoCal Witness Bermel states that” SoCalGas has included capital in this forecast for costs associated with unplanned natural gas transmission pipeline relocations that may be required within the forecasted period.” Is relocation of SoCal line ZZZ within the Morongo Indian Reservation one of the “unplanned natural gas transmission pipeline relocations that may be required within the forecasted period” referenced in Table JGT-8?
- b) With respect to same, does SoCal Gas have any plans to reduce the capacity available on the BTS from Blythe as part of this possible “unplanned” relocation?
 - (i) If so, where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal’s ability to serve peak day demand?
 - (ii) If so, where on SoCal’s 7X7 Risk Matrix would SoCal place such reduction of capacity in light of possible elimination of Aliso Canyon as a resource to meet SoCal’s ability to serve average day demand?

SoCalGas Response 4.7:

- a. No.
- b. No, SoCalGas does not have any plans to reduce the capacity available on the BTS from Blythe as part of the replacements referred to in the cited testimony.
 - i. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable

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SoCalGas Response 4.7 Continued:

- ii. SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SoCalGas further objects to this request on the grounds that it is unduly burdensome and out of scope given Ordering Paragraph 12 and Conclusion of Law 75 in D.16-06-054. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

Not applicable

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4.8 Reference is made to SCG-01 through SCG-49 (SDG&E-49) and Workpapers SCG-02 through SCG-44:

- a) Please provide the Cost of Service/Revenue Requirement Model and Result of Operations (RO) (s), with all costs at the level(s) presented in the testimony and Workpapers cited, used by SoCal Gas to develop the 2019 Request for \$2.990 Billion revenue requirement as well as the post TCJA revenue requirement of \$2.931 Billion. Please provide this information in MS Excel workbooks and or worksheets with all formulae, references and links intact.
- b) To the extent past period costs are used to project costs cited in the testimony and Workpapers, are not present in the Cost of Service/Revenue Requirement and RO Model(s) requested in 4.6 (a), please provide those model(s)/references. Please provide this information in MS Excel workbooks and or worksheets with all formulae, references and links intact.
- c) To the extent Exhibits, Tables and Workpapers presented in the testimony and Workpapers cited are not labeled in the Cost of Service/Revenue Requirement and RO Model(s) provided in response to 4.6 a) and 4.6 b), please provide appropriate labels.

SoCalGas Response 4.8:

- a. The RO Models requested, which contain **confidential and protected materials pursuant to P.U. Code Section 583, GO 66-D, D.17-09-023**, will be separately provided upon EDF's **execution of the non-disclosure certificate attached to the Protective Order**.
- b. Past period costs referenced in 4.6 (A) are not present in the 2019 GRC RO model.

SoCalGas' cost modeling in preparation of its forecast capital spending for 2017, 2018 and 2019 consists of several processes and components and is not a single spreadsheet; components of that modeling require network database applications that themselves require enterprise-level software including Microsoft SQL Server, Microsoft Visual Studio and Crystal Report Writer. An active Excel spreadsheet for this entire process does not exist.

- c. Direct costs presented in prepared testimony exhibits, tables, and workpapers can be found labeled in the RO model.

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4.9 Reference is made to SCG-48 Appendix B:

a) Please provide narrative descriptions of the following acronyms

- (i) ffu
- (ii) FF&U
- (iii) SW
- (iv) EG
- (v) NG
- (vi) TLS; and,
- (vii) NCCI/EG/WS/DGN

SoCalGas Response 4.9:

- (i) ffu – Franchise Fees and Uncollectibles
- (ii) FF&U - Franchise Fees and Uncollectibles
- (iii) SW - Southwest Gas
- (iv) EG – Electric Generation
- (v) NGV - Natural Gas Vehicles
- (vi) TLS – Transmission Level Service; and,
- (vii) NCCI/EG/WS/DGN – Noncore Commercial and Industrial/Electric Generation/Wholesale/DGN is known as Ecogas

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- 4.10 Of the \$10,477,000 set forth in SCG-17 at RFG-iii what are the amount(s) allocated toward:
- A) Enabling Regulatory Demand Forecast Group to make better forecasts using AMI data stored in the ICDA and or the data warehouse?
 - B) Enabling the Gas Acquisition Department to make better forecasts using AMI data of their accounts stored in the ICDA and/or the data warehouse?
 - C) Enabling the Customer Transport Agents/Aggregators to make better forecasts using AMI data of their accounts stored in the ICDA and/or the data warehouse?
 - D) Enabling Gas Control to provide to the Gas Acquisition Department gas balance data of their accounts for their use in balancing current day scheduled gas for their accounts against prior day imbalances for their accounts to rectify such prior day imbalances?
 - E) Enabling Gas Control to provide to the Customer Transport Agents/Aggregators gas balance data of their accounts for their use in balancing current day scheduled gas for their accounts against prior day imbalances for their accounts to rectify such prior day imbalances?
 - F) Enabling Gas Control to provide to the Gas Acquisition Department gas balance data for their use in balancing within day scheduled gas for their accounts to within day consumption for their accounts?
 - G) Enabling Gas Control to provide to the Customer Transport Agents/Aggregators gas balance data for their use in balancing within day scheduled gas for their accounts to within day consumption for their accounts?

SoCalGas Response 4.10:

The TY 2019 forecast in Rene Garcia's testimony (Exhibit SCG-17) is not allocated to any of the functions described in Q4.10.A-G.

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EDF 4.11 To the extent dollar amounts to enable the capabilities identified in EDF 4.9 A) through G) are not allocated to achieve those capabilities in the \$10,477,000 identified in SCG-17 at RFG-iii, please identify where in SCGs exhibits and workpapers dollars are allocated and the amount(s) so allocated towards:

- A) Enabling the Regulatory Demand Forecast Group to make better forecasts using AMI data stored in the ICDA and or the data warehouse?
- B) Enabling the Gas Acquisition Department to make better forecasts using AMI data of their accounts stored in the ICDA and/or the data warehouse?
- C) Enabling the Customer Transport Agents/Aggregators to make better forecasts using AMI data of their accounts stored in the ICDA and/or the data warehouse?
- D) Enabling Gas Control to provide to the Gas Acquisition Department gas balance data of their accounts for their use in balancing current day scheduled gas for their accounts against prior day imbalances for their accounts to rectify such prior day imbalances?
- E) Enabling Gas Control to provide to the Customer Transport Agents/Aggregators gas balance data of their accounts for their use in balancing current day scheduled gas for their accounts against prior day imbalances for their accounts to rectify such prior day imbalances?
- F) Enabling Gas Control to provide to the Gas Acquisition Department gas balance data for their use in balancing within day scheduled gas for their accounts to within day consumption for their accounts?
- G) Enabling Gas Control to provide to the Customer Transport Agents/Aggregators gas balance data for their use in balancing within day scheduled gas for their accounts to within day consumption for their accounts?

SoCalGas Response 4.11:

SoCalGas clarifies that this question references 4.10 and not 4.9, and with this clarification, SoCalGas responds as follows:

SoCalGas objects to Question 4.11 A-G on the grounds that it assumes facts not in evidence and lacks foundation. Further, SoCalGas objects to this request on the grounds that SoCalGas' Gas Operations is required to treat its shippers, including but not limited to, Gas Acquisition, Customer Transport Agents, and Aggregators, on a nondiscriminatory basis. Accordingly, SoCalGas interprets this request as a question about SoCalGas' shippers as a whole. Subject to and without waiving these objections, SoCalGas responds as follows:

SoCalGas exhibits or workpapers do not have dollars allocated or identified for enabling any of the functions described in A-G.