**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING
(A.18-07-024)
(DATA REQUEST CAL ADVOCATES-DR-037)**

DATA RECEIVED: 2-6-19

DATE RESPONDED: 2-20-19

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The following data request questions pertain to Chapter 4 of the Applicants testimony, the Prepared and Direct Testimony of Jeff Huang.

QUESTION 1:

On page 2 of his pre-filed testimony (Chapter 4) Mr. Huang explains that: "The electric demand forecast for California used in the Model is from the California Energy Commission's (CEC) California Energy Demand Forecast, 2018-2030 Revised Forecast, dated January 2018." Please re-run the Market Builder Model[1] with the most recent (2019) CEC California Energy Demand Forecast.

RESPONSE 1:

Applicants object to this question as unduly burdensome to produce. Notwithstanding this objection, and subject thereto, Applicants respond as follows. The CEC's most recent Energy Demand Forecast dated January 2019 suggests a slightly lower statewide net energy load of about 1% during the TCAP period.

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[1] Please note that Applicants do not utilize the Market Builder Model. As stated in Chapter 4 (Huang) at p.1, Applicants utilize the Market Analytics model developed by the software provider ABB Enterprise Software. Accordingly, Applicants' response assumes the question meant to refer to the Market Analytics model.

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QUESTION 2:

On pages 2-3 of his pre-filed testimony (Chapter 4) Mr. Huang explains that: "Because the hydroelectric generation exhibits a year-to-year random variability, the forecast assumes that the availability of hydroelectricity generation in California and the PNW will be equal to the 20-year average, based on data provided by ABB Enterprise Software." Please explain how the ABB Enterprise Software derived the 20-year average of hydroelectric generation availability.

RESPONSE 2:

Applicants license the Market Analytics model from ABB Enterprise Software, and are therefore not experts in each of the various inputs utilized by the model. Notwithstanding, Applicants are generally aware that ABB Enterprise Software derives its 20-year average of hydroelectric generation availability by calculating simple averages from historical EIA Forms 923 and 906 (with the latter being a recent replacement for Form 867). EIA forms are publicly available at the following website: https://www.eia.gov/electricity/data/eia923/.

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QUESTION 3:

What role do natural gas prices play in Sempra's Utility Electric Generation forecast?

RESPONSE 3:

Natural gas price is one component of the variable costs for gas-fired power generators in the model. Additionally, generators' variable O&M cost, gas transportation cost, start-up cost, and emission cost are the other variable costs that go into the Model's dispatch decision. Within a region, gas-fired generators would have the same natural gas price. Power generators' location, characteristics, and costs are what make each generator unique.