

**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-056)

DATA RECEIVED: 3-25-19

DATE RESPONDED: 4-2-19

The following questions pertain to the direct testimony of Michelle Dandridge, Chapter 1, Storage Overview and Proposal.

QUESTION 1:

Please explain in detail how core customers would benefit and utilize the proposed 16 Bcf load balancing function.

RESPONSE 1:

All customers on the system, including core customers, can utilize the 16 Bcf of storage inventory for the balancing service.

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QUESTION 2:

Does the proposed 8 Bcf of high and 8 Bcf of low inventory balancing take account for both core and noncore customer imbalances? Please explain your response.

RESPONSE 2:

Yes. Both core and noncore customers utilize load balancing services and the cumulative imbalance as displayed in ENVOY. The load balancing service is a year-round service available to all customers on the system.

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QUESTION 3:

What class of customers are being referred to in the statement "If customers have accumulated a positive imbalance of 7.8 Bcf out of the 8 Bcf, the high OFO will be triggered when the forecasted positive imbalance exceeds 200 MMcf." Page 13, lines 9 – 12.

RESPONSE 3:

Core and noncore.

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QUESTION 4:

Please explain and show your analysis and calculation for how the Applicants determined to allocate the costs of the 16 Bcf of load balancing between the core and noncore. With your response please include any applicable workpapers.

RESPONSE 4:

In the last TCAP Phase 1 decision (D.16-06-039), all costs allocated to the load balancing function (including load balancing inventory, injection, and withdrawal) were all allocated on an equal-cents per therm basis to both core and noncore customers. See D.16-06-039, p. 65, Ordering Paragraph 15 (“Costs allocated to the load balancing function (including injection, inventory, and withdrawal) shall be allocated among all customers, noncore and core alike, on an equal-cents per therm basis”). SoCalGas does not propose to change the allocation methodology in this TCAP.

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QUESTION 5:

Please provide a definition for the term “cushion gas”.

RESPONSE 5:

SoCalGas defines cushion gas as the volume of gas intended to serve as the permanent inventory within a storage reservoir that is required to maintain adequate pressure for deliverability rates throughout the withdrawal season. This definition is generally consistent with the Division of Oil, Gas, and Geothermal Resources’ (DOGGR) definition of cushion gas (volume of natural gas intended as a permanent inventory in the storage reservoir to maintain adequate pressure and deliverability rates throughout the withdrawal process), as well as the FERC definition of cushion gas (volume of gas, including native gas, needed as a permanent inventory in a storage reservoir to maintain adequate reservoir pressure and deliverability rates throughout the withdrawal season).

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QUESTION 6:

Please provide a definition for the term “recoverable gas”.

RESPONSE 6:

Applicants object to this question as vague and ambiguous with regards to the term “recoverable gas.” Subject to and without waiving this objection, Applicants respond as follows. Applicants have not used this term in testimony and do not have a definition for this term.

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QUESTION 7:

Please provide a definition for the term “working gas”.

RESPONSE 7:

SoCalGas’s definition of working gas is generally consistent with the DOGGR definition of working gas: The volume of natural gas in the reservoir above the base or cushion gas level that is available to the marketplace, as well as the FERC definition of working gas: Working gas (top gas) - the volume of gas in the reservoir above the designed level of cushion gas. If the Conditions allow it, a percentage or all of the working gas capacity could be injected and withdrawn more than once during any season.

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QUESTION 8:

Please provide the current level of cushion gas available at each of SoCalGas' four storage facilities.

RESPONSE 8:

As of December 31, 2018:

Storage Field	Playa Del Rey	Honor Rancho	La Goleta	Aliso Canyon
Cushion Gas (Mcf)	4,461,545	20,996,949	24,589,073	81,525,000

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QUESTION 9:

Please provide the current level of recoverable gas available at SoCalGas' storage facilities.

RESPONSE 9:

Applicants object to this question as vague and ambiguous with regards to the term "recoverable gas." See Response 6.

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QUESTION 10:

Please clarify how the definition of “new reliability function” differs from the definitions provided above for cushion gas, recoverable gas, and working gas.

RESPONSE 10:

Applicants object to this question as vague and ambiguous with regards to the term “recoverable gas.” See Response 6. Subject to and without waiving this objection, Applicants respond as follows. The 21 Bcf of gas allocated to the proposed new Reliability function will function in the proposed TCAP period similarly to cushion gas but on a non-permanent basis.

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QUESTION 11:

Please clarify what entity (i.e., Gas Acquisition, System Operator, other) would be responsible for purchasing the gas used for the proposed 21 Bcf New Reliability Function.

RESPONSE 11:

Applicants have not determined which group will ultimately procure this gas; however, it could be the System Operator's Operational Hub function. Gas Acquisition is another function that could procure the gas; however, the core would not own the gas in this scenario.