

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER
VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN
CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE
DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CAUSE-SCG-01)**

Date Requested: September 7, 2023, Date Due: September 21, 2023

Submitted: September 21, 2023

Response Q 2, 9 Supplemental: November 8, 2023

QUESTION 1:

The US Environmental Protection Agency summarizes compressor station blowdowns as follows: *“Compressor stations along a transmission pipeline, gathering/boosting stations, and compressors at processing plants are periodically taken offline (depressurized) for operational or maintenance needs, for emergencies, or emergency shut down (ESD) system testing. To take a compressor station or an individual compressor offline, station or unit isolation valves are closed and the gas within the compressors and associated piping is manually or automatically vented to the atmosphere (i.e., blowdown) or sent to a flare.”* (see <https://www.epa.gov/natural-gas-star-program/compressor-station-blowdowns>)

- a. What are SoCalGas procedures and requirements for documenting blowdown events at the Ventura Compressor Station? Please identify any changes to processes and/or requirements that have occurred in the past 10 years.
- b. Please provide, in per-event tabular format, the documented dates of each and every blowdown event that has occurred at the Ventura Compressor Station in the past 10 years including the quantity of methane released, the time of occurrence and the duration during each event.
- c. Please indicate whether your response to Question 1(b) may not capture all blowdown events that have occurred at the Ventura Compressor Station in the past ten years due to a lack of records or recordkeeping for each event and explain why the Company has failed to document all such events.

RESPONSE 1:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound and argumentative. SoCalGas additionally objects to this request on the grounds the information sought is publicly available, and thus equally available to the requesting entity. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly

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prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas uses company gas standards to capture and document applicable blowdown requirements. The requirements have evolved over the last ten years. Copies of the gas standards related to blowdown procedures and the publishing history for each standard are provided below. See Attachments:

Attachments:

- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_01_GS182.0032
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_02_GS182.0032PubHistory
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_03_GS223.0155
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_04_GS223.0155PubHistory
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_05_GS223.0240
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_06_GS223.0240PubHistory
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_07_GS223.0255
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_08_GS223.0255PubHistory
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_09_Form3466
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_10_Form3466PubHistory
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_11_Form7011
- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_12_Form7011PubHistory

- b. The data includes the date of and some of the times for each blowdown and the quantity of methane released. SoCalGas does not track the duration of each event. This data has been filed with the California Public Utilities Commission since 2015 as part of SoCalGas's annual *Natural Gas Leakage Abatement Report (NGLA Report)* in compliance with Senate Bill 1371 (Leno, 2014) and Order Instituting Rulemaking (OIR) 15-01-008. Each annual NGLA Report, including blowdown data, is posted on SoCalGas's public website, accessible at <https://www.socalgas.com/regulatory/R1501008>, and has been available since each annual NGLA Report's publication. There were no requirements to record blowdown data until SB 1371 was enacted. Prior to 2016, SCG reported methane emissions through a third-party verification process that did not include recording methane emissions for blowdowns at the Ventura Compressor Station. In 2021 the CPUC required that each blowdown be reported separately; prior to that requirement, blowdowns were aggregated for reporting.

Attachments:

- VCM_A2308019_CAUSE_SCG_01_Q01_Attach_13_Ventura Blowdowns_2015_2023

- c. See response to 1.b

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QUESTION 2:

Page 3 of the CPCN Application states that “the Ventura Compressor Station also supports the reliability of the integrated gas and electric energy system.”

- a. Please identify all electric generation facilities located on the North Coastal System that receive gas delivered through the Ventura Compressor Station. For each electric generation facility, please identify its total capacity in MW, type of facility (e.g. gas turbine, fuel cell, combined heat & power), the total delivered consumption (in both Mcf and MMBtu) history over the past ten years and the nameplate heat rate of each generating unit. (If any generating unit lacks ten years of history, please provide history that is available)

RESPONSE 2:

- a. SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 *et seq.*; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) SoCalGas also objects to this request on the grounds it incorrectly assumes that the Ventura Compressor Station only supports reliability of the integrated gas and electric energy system by directly supplying electric generation facilities. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The La Goleta Storage Field has the capability to support the reliability of the integrated gas and electric energy system both directly, by supplying electric generation facilities in the North Coastal System, and indirectly, by serving customer demand in the North Coastal System so that other supplies are then available to serve other uses, including electric generation, in other areas of SoCalGas’s system. This information is described in the PEA in Section 2.1.1.

Information regarding publicly identified electric generation facilities in the North Coastal System is available to the public on the California Energy Commission (CEC) website at:

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<https://cecgis->

[caenergy.opendata.arcgis.com/apps/ad8323410d9b47c1b1a9f751d62fe495/explore](https://cecgis-caenergy.opendata.arcgis.com/apps/ad8323410d9b47c1b1a9f751d62fe495/explore)

QUESTION 3:

Page 17 of the CPCN Application states that “During a withdrawal operation, gas can be delivered south of the Ventura Compressor Station.”

- a. Please provide the normal “integrated system” operating pressure and the expected and/or documented “integrated system” operating pressure during a withdrawal operation as described within the CPCN.
- b. Please fully describe, in a narrative, how such gas storage withdrawal event displaces the gas normally supplied by the Ventura Compressor Station and document (through the use of a table describing each event, the duration, that volume of gas sent out by the gas storage facility, and system flow pressures compared against the normal system pressures) that have occurred over the last 10 years.
- c. Please identify the number of days each year and total quantity of gas that has been delivered south of the Ventura Compressor Station for each of the past 10 years.

RESPONSE 3:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it seeks confidential information. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with reference to the phrases “normal operating pressure,” “gas storage withdrawal event,” and the use of quotation marks around the term “integrated system.” Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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a. and b. The integrated transmission system generally operates between 200 and 1000 pounds per square inch gage (psig). Gas supplies are withdrawn from the La Goleta Storage Field as system demand requires, and not necessarily when “the gas normally supplied by the Ventura Compressor Station” is unavailable.

c. Please see the table below for the approximate annual flow south of Ventura Compressor Station, in million standard cubic feet per day (MMscf), and the number of days on which southern flow was registered on SoCalGas’s SCADA system, from 2012 through September 1, 2023. Any registration of southern flow would result in logging a day with southern flow. The operational flow data is approximate and is used by the SoCalGas Gas Control department solely for general information on the state of the gas transmission system, and is not billing quality data. The data is approximate and should not be construed to be accurate, such as data collected by custody transfer meters. This data was not used to inform the Ventura Compressor Station Modernization Project.

Flow South from Ventura Compressor Station

Year	Volume (MMscf)	Number of Days with Flow Registered
2012	5757	366
2013	9401	310
2014	10421	365
2015	6417	365
2016	7010	366
2017	5349	92
2018	4871	93
2019	6483	88
2020	4259	124
2021	5894	309
2022	10572	347
2023 (through 9/1/23)	8482	244

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QUESTION 4:

Please separately identify all commercial, industrial, and transport (including the documentation of each entities' customer service class) customers downstream of the Ventura Compressor Station. For each customer identified, please provide annual usage (Mcf) for each of the last 5 years. Please provide this and all proceeding responses in unlocked spreadsheet format with all formulae, calculations, and data present and unlocked when available. To the extent required by law to protect customer data rights, this information may be anonymized.

RESPONSE 4:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it seeks confidential customer information protected under privacy laws. (See Cal. Civil Code §§ 1798.80 *et seq.*; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase, "all commercial, industrial, and transport (including the documentation of each entities' [sic] service class) customers." Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas understands "commercial" to refer to core commercial customers; "industrial" to refer to core industrial customers; and "transport" to refer to electric generation, Enhanced Oil Recovery (EOR), non-core commercial, and non-core industrial customers. SoCalGas interprets downstream of the Ventura Compressor Station as customers in Santa Barbara and San Luis Obispo counties. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

In order to determine whether information was sufficiently aggregated to comply with applicable confidentiality laws, a 15/15 Rule analysis was applied for each individual cell in the spreadsheets. The 15/15 Rule comes from the Public Utilities Commission's decisions setting forth a mechanism for assessing whether customer usage data is sufficiently aggregated to protect customer confidentiality. The 15/15 Rule generally provides that aggregated or anonymized customers' specific information must be made up of at least 15 customers and a single customer's load must be less than 15% of an

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assigned category. If the number of customers in the compiled data is less than 15, or if a single customer's load is more than 15% of the total data, the 15/15 Rule provides for combining categories or removing non-conforming customer information before the information is released, or otherwise protecting the customer information from public disclosure. Accordingly, the transport customer class data is aggregated for years 2018, 2020, and 2021. For years 2019 and 2022, a single customer's load was greater than 15% of the transport category; accordingly, the aggregate load cannot be provided for those years.

Attachment:

- VCM_A2308019_CAUSE_SCG_01_Q04_Attach 01.xls

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QUESTION 5:

Please provide a narrative describing and the results of hydraulic modeling (including foundational data) that demonstrates the impact of the Ventura Compressor Station on downstream customers and delivery (spanning the entire gas storage injection season) pressure at the Goleta storage facility. In this response, please specifically provide:

- a. Pressures at key nodes under design day conditions with and without the Ventura Compressor Station in service that demonstrate areas that would currently experience low pressure (identify the threshold SoCalGas remedies for low pressure deliveries)
- b. Pressures at key nodes under design day conditions without the compressor station in service at all that demonstrates areas that would experience low pressure.
- c. Please provide a detailed narrative of the Goleta Gas Storage facility injection and withdrawal seasons (including the facility injection season pressure / maximum deliverability / duration documentation and/or curves). Please provide similar documentation for the Goleta maximum withdrawal season

RESPONSE 5:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with respect to the phrases "foundational data" and "maximum withdrawal season." Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas did not perform hydraulic modeling spanning the entire gas storage injection season for the Application, nor have we previously performed hydraulic modeling spanning an entire operating season or year, and SoCalGas is unaware of any other gas utility or gas transportation company that does so. SoCalGas performs hydraulic modeling of extreme events spanning a 24-hour operating

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period, including but not limited to the Commission's mandated design standards, forecast high summer demand conditions, low interstate pipeline deliverability scenarios, and major infrastructure outages. SoCalGas did, however, perform several mass balance calculations for this Application, examining assumed supply and demand under various facility scenarios spanning the summer and winter operating seasons; please refer to the Application at Section III.C. A narrative of storage injection and withdrawal seasons is also available in the Application at Section III. A. 1., pages 14-15.

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QUESTION 6:

Please provide the number of days or hours that the Goleta storage facility has been in a “filling” state in each of the last 5 years while the Olive St. (Ventura) compressor was operational. Inasmuch as such data is unavailable, please provide the number of days or hours that the Goleta storage facility has been in a filling state in each of the last 5 years, regardless of the status of the Olive St. (Ventura) compressor station. Please note that SoCalGas’ response to data request CEJA-SEU-06, Q.5 in A.22-05-015 (SoCalGas GRC Application) provided this information through August 31, 2022. CAUSE seeks updated information though the present.

RESPONSE 6:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase, “the Olive St. (Ventura) compressor.” Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas understands “the Olive St. (Ventura) compressor” to refer to the Ventura Compressor Station referred to throughout the Application. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The following information is for the 6-year period from September 1, 2017 through August 31, 2023.

Year	Days on Injection
2017 (from September 1, 2017)	103
2018	229
2019	221
2020	226
2021	219
2022	193
2023 (through August 31, 2023)	154

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QUESTION 7:

Please provide the maximum number of *days* in a year that the Ventura Compressor Station could remain out of service before:

- a. The Goleta storage facility would become underfilled for the year;
- b. Customer outages would occur.

RESPONSE 7:

SoCalGas objects to this request on the grounds it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

SoCalGas further objects to this request on the grounds it presents an incomplete hypothetical. SoCalGas further objects to this request on the grounds it is vague and ambiguous with respect to the terms "underfilled" and "outages," and whether the question refers to all compressors at the Ventura Compressor Station being out of service at the same time. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. and b. SoCalGas's injection into the La Goleta Storage Field generally occurs from April 1 through October 31, during the warmer summer months. If the La Goleta Storage Field is drawn down to minimum levels during the winter season (generally November through March), any outage at the existing Ventura Compressor Station during the injection months may impede the ability to reach maximum inventory levels. As a prudent operator, SoCalGas does not elect to operate its gas transmission system at the extreme margins or wait to take action on a foreseeable issue. SoCalGas has not conducted this analysis to determine the number of days that would impact customers under all possible conditions.

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QUESTION 8:

Has SoCalGas considered a new tap on the PG&E supply in the Morro Bay region to connect to the Company's high-pressure distribution or transmission pipelines in the area as a standalone alternative to the proposed VCM project or in conjunction with a reduced scope/size VCM project?

- a. If so, please provide all data relating to this comparison. Please note this question was asked in Data Request CEJA-SEU-06, Q. 9 in A.22-05-015 (SoCalGas GRC Application), to which SoCalGas responded, "No, because the Morro Bay tap is too far north and would not be able to sustain the coastal system." CAUSE seeks confirmation that this is still SoCalGas' response to this question. If not, please provide your updated answer.
- b. Please confirm that a pipeline budgetary review of building a pipeline segment from that PG&E Morro Bay regional pipeline to the Company's high-pressure distribution and/or transmission pipelines that would allow for a potential standalone alternative to the VCM project has been performed. If so, please provide any and all documentary evidence of such a budgetary review and provide any and all documents developed relative to the Company making a decision not to proceed with such a project.

RESPONSE 8:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it seeks information that the request itself identifies as being within the possession of the requesting party and, moreover, presents an incomplete hypothetical. SoCalGas additionally objects to this request on the grounds it is vague and ambiguous. SoCalGas also objects to this request on the grounds it is vague and ambiguous, including with respect to the phrases "pipeline budgetary review" and "that PG&E Morro Bay regional pipeline." Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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a. and b. It would not be feasible because the Morro Bay tap is too far north and would not be able to sustain the coastal transmission system.

SoCalGas purchased the former PG&E Line 306, which delivered gas to the SoCalGas Morro Bay receipt point, with Commission authorization in D.20-03-018, as an alternative to replacing Line 44-1008 as required under the Pipeline Safety Enhancement Plan (PSEP).

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QUESTION 9:

The CPCN Application at page 18, footnote 13 states that “While SoCalGas has the infrastructure to receive some supply from PG&E at Kettleman Station for delivery to the North Coastal distribution system in San Luis Obispo County at Morro Bay, it is neither a reliable nor guaranteed source.... PG&E did not agree to firm deliveries at Kettleman Station when so requested by SoCalGas.”

- a. Please provide:
 - i. Annual throughput from deliveries at Kettleman Station for each of the last 5 years;
 - ii. All correspondence with PG&E regarding firm deliveries at Kettleman Station for the past five years;
 - iii. A copy of the transportation agreement in effect between the Company and PG&E indicating the delivery of gas volumes at a service inferior to Firm Service.
- b. What is the maximum quantity of gas per year that can be supplied to the North Coast system from PG&E at Kettleman Station based on physical limits of current infrastructure. Please explain a detailed explanation in support of your response.
- c. Is increased gas from this supply point limited by current infrastructure, contractual agreements with PG&E or both? Please provide a detailed explanation and narrative to support your response.
- d. Regarding the pipelines that connect the Morro Bay area distribution system to the Ventura area distribution system. Please provide the number of miles of main that connect these systems separated:
 - i. by diameter,
 - ii. by MAOP, and
 - iii. by type (distribution or transmission).
- e. Regarding the pipe identified in SoCalGas’ response to Question (c) above, please provide a map that displays:
 - i. The distribution main and transmission main in the Morro Bay and Ventura areas as well as all such pipeline between the two,
 - ii. The approximate locations of all transport customers, and
 - iii. The approximate locations of all large C&I customers.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER
VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN
CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE
DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CAUSE-SCG-01)**

Date Requested: September 7, 2023, Date Due: September 21, 2023

Submitted: September 21, 2023

Response Q 2, 9 Supplemental: November 8, 2023

RESPONSE 9:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it seeks information that is not within the possession, custody, or control of SoCalGas. SoCalGas additionally objects to this request on the grounds it presents an incomplete hypothetical and seeks data pipeline diameters, mileage, and operating pressure that do not separately convey an understanding of how the data fits together within a system. SoCalGas further objects to this request on the grounds it seeks confidential infrastructure and customer-specific data that is protected from disclosure pursuant to Cal. Govt. Code § 7929.205, 6 U.S.C. § 131(3), 6 U.S.C. § 133(a)(1)(E), 6 CFR §§ 29.2(b) & 29.8, Cal. Pub. Util. Code § 364(d), D.20-08-031, Cal. Civil Code §§ 1798.80 et seq., Cal. Pub. Util. Code § 8380(d), D.11-07-056, D.12-08-045, D.14-05-016, and SoCalGas Tariff Rule No. 42. SoCalGas objects to this request on the ground it seeks information that is publicly available on SoCalGas’s website, and thus is equally available to the requesting party. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). SoCalGas interprets the word “Company” in the question to mean SoCalGas and responds accordingly. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

a.

Attachments:

- i. VCM_A2308019_CAUSE_SCG_01_Q09 Attach 01_KettlemanDeliveries.xls
- ii. VCM_A2308019_CAUSE_SCG_01_Q09 Attach 02_Correspondence_Redacted
(Note this encompasses the correspondence with PG&E regarding firm deliveries at Kettleman Station. SoCalGas was verbally informed that PG&E was unable to provide new annual firm off-system delivery agreements at this time.)
- iii. VCM_A2308019_CAUSE_SCG_01_Q09 Attach_03_MasterExchangeAgmt

- b. The annual capacity that can be supplied to the North Coastal System at Morro Bay from PG&E at Kettleman Station is dependent upon system demand and available facilities. Assuming all facilities are in service and sufficient demand exists on the North Coastal System, SoCalGas has the ability to receive up to 40 MMcfd of supply at Morro Bay. This

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does not imply that 40 MMcf/d or any other level of supply at Morro Bay could be received on any given day.

- c. The ability to receive supply at Morro Bay is a function of the existing distribution infrastructure on the North Coastal System, the transmission facilities in service, and the level of system demand.
- d.
- e. SoCalGas maintains certain pipeline information on its website:
- Transmission and high-pressure distribution pipelines:
<https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gaspipeline-map>
Corrected link: <https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>
 - Distribution mains and services:
<https://www.socalgas.com/stay-safe/distribution-pipelines-emissions-map>
 - The National Pipeline Mapping System (“NPMS”) Public Viewer provides information about pipelines owned and operated by other entities (such as PG&E). The NPMS Public Viewer can be accessed here:
<https://pvnpm.phmsa.dot.gov/PublicViewer/>