SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
NORTH-SOUTH PROJECT REVENUE REQUIREMENT
(A.13-12-013)
(3RD DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

QUESTION 3.1:

3.1. With respect to the testimony of Richard Morrow on page 4, lines 2-8, which states:

> SoCalGas and SDG&E customers will always be at risk of curtailment if there are significant problems on one or more of the interstate pipelines connected to our system. There is only so long that storage and in-state supplies can fully support a system and customer base as large as ours. But no portion of our system should be at the mercy of limited interruptions on the upstream interstate pipelines. Currently, however, *any* problem with upstream supplies on the El Paso system will potentially result in curtailments for Southern System customers, including EGs. In the long term, this is no way to run a natural gas system.

3.1.1. Please state the number of interruptions that have been experienced on El Paso's southern system during the last five years.
3.1.2. Please state the duration of any interruption identified in the previous question.
3.1.3. Please identify the number of times that the deliveries from El Paso's southern system have been more than 20 percent below the nominations during the last five years.
3.1.4. Please identify the number of times that the deliveries from El Paso's southern system for the System Operator have been more than 10 percent below the level nominated by the System Operator during the last five years.
3.1.5. Please identify the number of interruptions that have been experienced on El Paso's northern system during the last five years.
3.1.6. Please state the duration of any interruption identified in the previous question.
3.1.7. Please identify the number of times that the deliveries from El Paso's northern system have been more than 20 percent below the nominations during the last five years.
3.1.8. Please identify the number of interruptions that have been experienced on Kern River's system during the last five years.
3.1.9. Please state the duration of any interruption identified in the previous question.
3.1.10. Please identify the number of times that the deliveries from Kern River's system have been more than 20 percent below the nominations during the last five years.

RESPONSE 3.1:

3.1.1 SoCalGas does not have the requested information about El Paso's system operations. To the extent this information is public it is equally available to SCGC.

3.1.2 Please refer to Response 3.1.1.

3.1.3 This information is available on SoCalGas' Envoy system at https://scgenvoy.sempra.com

3.1.4 There were six instances in the last five years.

3.1.5 Please refer to Response 3.1.1

3.1.6 Please refer to Response 3.1.1

3.1.7 Please refer to Response 3.1.3.

3.1.8 SoCalGas does not have the requested information about Kern River's system operations. To the extent this information is public it is equally available to SCGC.

3.1.9 Please refer to Response 3.1.8.

3.1.10 Please refer to Response 3.1.3.

QUESTION 3.2:

3.2. In SoCalGas' Response to Ordering Paragraph 3 of D.92-09-045 in R.88-08-018, SoCalGas described Line 225 and its operating capabilities in some detail at pages 3-4.

3.2.1. Is the description of Line 225 and its operating capabilities that is set forth in SoCalGas' Response still accurate?
3.2.2. If the answer to the previous question is "no," please provide a current description of Line 225 and its operating capabilities at the same level of detail that is presented in SoCalGas' Response.
3.2.3. Does Honor Rancho gas still flow directly into Line 225?
3.2.4. If the answer to the previous question is "no," please identify the lines into which Honor Rancho gas currently flows.
3.2.5. Is SoCalGas physically able to deliver any gas into the Kern/Mojave system at the Wheeler Ridge interconnection point under normal operating conditions?
3.2.6. If the answer to the previous question is "no," please explain what factors prevent the delivery of any gas into that system.
3.2.7. If the answer to the question prior to the previous question is "yes," please identify the amount of gas that could be delivered into that system.
3.2.8. If the amount of gas identified in the previous question varies with circumstances, please identify the amount of gas associated with the various types of circumstances that would limit the amount of gas delivery capability.
3.2.9. In the event of an interruption to deliveries on the Kern/Mojave system, please identify the amount of natural gas that could be delivered from Honor Rancho north on Line 225 into the Kern/Mojave system at the Wheeler Ridge interconnection point.
3.2.10. Please identify how long Honor Rancho would be able to maintain this level of delivery.

RESPONSE 3.2:

3.2.1. Yes.

3.2.2. N/A

3.2.3. Yes.

3.2.4. N/A

3.2.5. No.

3.2.6. SoCalGas lacks compression, valving, and controls needed to deliver gas supply at that location.

3.2.7. N/A

3.2.8. Please refer to Response 3.2.6 of this data request.

3.2.9. Please refer to Response 3.2.6 of this data request.

3.2.10. Please refer to Response 3.2.6 of this data request.

QUESTION 3.3:

3.3. Regarding SoCalGas Line 6905, which interconnects with Kern/Mojave at Kramer Junction:

3.3.1. Is SoCalGas physically able to deliver any gas into the Kern/Mojave system at the Kramer Junction interconnection point under normal operating conditions?
3.3.2. If the answer to the previous question is "no," please explain what factors prevent the delivery of any gas into that system.
3.3.3. If the answer to the question prior to the previous question is "yes," please identify the amount of gas that could be delivered into that system.
3.3.4. If the amount of gas identified in the previous question varies with circumstances, please identify the amount of gas associated with the various types of circumstances that would limit the amount of gas delivery capability.
3.3.5. In the event of an interruption to deliveries on the Kern/Mojave system, please identify the amount of natural gas that could be delivered from Honor Rancho via Lines 225/335/6905 into the Kern/Mojave system at the Kramer Junction interconnection point.
3.3.6. If no gas from Honor Rancho could be delivered to the Kramer Junction interconnection point under these circumstances, please identify the factors that would prevent delivery of Honor Rancho gas into Kern/Mojave.
3.3.7. If no gas from Honor Rancho could be delivered to the Kramer Junction interconnection point under these circumstances, could gas from Line 235 be delivered through Kramer Junction into Kern/Mojave?
3.3.8. If the answer to the previous question is "yes," please identify how much gas could be delivered from Line 235 through Kramer Junction into Kern/Mojave.

RESPONSE 3.3:

3.3.1. No.

3.3.2. Please refer to Response 3.2.6 of this data request.

3.3.3. N/A

3.3.4. Please refer to Response 3.2.6 of this data request.

3.3.5. Please refer to Response 3.2.6 of this data request.

3.3.6. Please refer to Response 3.2.6 of this data request.

3.3.7. No.

3.3.8. N/A

QUESTION 3.4:

3.4. Assuming there were an interconnection point between SoCalGas Lines 235/4000 and Mojave Pipeline near the current interconnection with PG&E that is east of Newberry:

3.4.1. Would SoCalGas be physically able to deliver any gas into Mojave at this interconnection point under normal operating conditions?
3.4.2. If the answer to the previous question is "no," please explain what factors prevent the delivery of any gas into that system.
3.4.3. If the answer to the question prior to the previous question is "yes," please identify the amount of gas that could be delivered into that system.
3.4.4. If the amount of gas identified in the previous question varies with circumstances, please identify the amount of gas associated with the various types of circumstances that would limit the amount of gas delivery capability.
3.4.5. In the event of an interruption to deliveries on Mojave, please identify the amount of natural gas that could be delivered from Honor Rancho via Lines 225/335/235 into Mojave at the interconnection point.
3.4.6. If no gas from Honor Rancho could be delivered to the interconnection point under these circumstances, please identify the factors that would prevent Honor Rancho gas from being delivered into Mojave.
3.4.7. If no gas from Honor Rancho could be delivered to the interconnection point under these circumstances, could gas from Line 235 be delivered into Mojave at the interconnection point?
3.4.8. If the answer to the previous question is "yes," please identify how much gas could be delivered from Line 235 through the interconnection point into Mojave.

RESPONSE 3.4:

3.4.1. No.

3.4.2. The pressure on the SoCalGas system at a hypothetical location east of our Newberry compressor station operates at a lower pressure than the Mojave Pipeline. Additional facilities would be required before any gas could be supplied to Mojave at that location.

3.4.3. N/A

3.4.4. Please refer to Response 3.4.2 of this data request.

3.4.5. No gas from Honor Rancho can be delivered to that location.

3.4.6. Please refer to Response 3.4.2 of this data request.

3.4.7. Please refer to response 3.4.2 of this data request.

3.4.8. N/A