SAN DIEGO GAS & ELECTRIC COMPANY SOUTHERN CALIFORNIA GAS COMPANY NORTH-SOUTH PROJECT REVENUE REQUIREMENT (A.13-12-013)

(10TH DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

QUESTION 10.1:

- 10.1. With respect to the testimony on page 8, lines 11-21 and page 9, lines 1-4:
 - 10.1.1. If the North-South Pipeline were in place, would SoCalGas have been able to deliver sufficient supplies into the Southern System to avoid the severe drafting of the pipeline system on February 2, 2011?
 - 10.1.2. Would deliveries across the North-South pipeline been sufficient to eliminate the need to deliver gas through Otay Mesa on February 2, 2011?
 - 10.1.3. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?
 - 10.1.4. If the North-South Pipeline were in place, would SoCalGas have been able to deliver sufficient supplies into the Southern System to avoid the curtailment on February 3, 2011?
 - 10.1.5. Would deliveries across the North-South pipeline been sufficient to eliminate the need to deliver gas through Otay Mesa on February 3, 2011?
 - 10.1.6. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?

RESPONSE 10.1:

With respect to the testimony on page 8 lines 11-21 and page 9, lines 1-4, SoCalGas and SDG&E do not believe that either the North-South pipeline or deliveries from Honor Rancho would have been able to support the Southern System on February 2 and 3, 2011. SoCalGas and SDG&E were short of supply across their entire system during that even, and there were no supplies available on its Northern System to transport to the Southern System. Because our Southern System is not interconnected to the same extent as the rest of our transmission system, when we have overall supply issues, the first place we notice that is on the Southern System, and that lack of interconnectedness limits our options. SoCalGas and SDG&E recently filed an application proposing a "low OFO" procedure would help in these instances of overall system supply shortages. If the low OFO procedure were in place and adequate supplies were delivered, the North-South pipeline would allow customers to deliver their supplies at the receipt point of their choice and allow SoCalGas & SDG&E to deliver that supply throughout the system.

SAN DIEGO GAS & ELECTRIC COMPANY SOUTHERN CALIFORNIA GAS COMPANY NORTH-SOUTH PROJECT REVENUE REQUIREMENT (A.13-12-013)

(10TH DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

QUESTION 10.2:

- 10.2. With respect to the testimony on page 9, lines 11-16:
 - 10.2.1. If the North-South Pipeline were in place, would SoCalGas have been able to deliver sufficient supplies into the Southern System to eliminate the curtailment watch on January 14, 2013?
 - 10.2.2. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?
 - 10.2.3. If the North-South Pipeline were in place, would SoCalGas have been able to deliver sufficient supplies into the Southern System to eliminate the curtailment watch on January 15, 2013?
 - 10.2.4. Would deliveries across the North-South pipeline been sufficient to eliminate the need to deliver gas through Otay Mesa on January 15, 2013?
 - 10.2.5. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?
 - 10.2.6. Would deliveries across the North-South pipeline been sufficient to eliminate the need to deliver gas through Otay Mesa on January 16, 2013?
 - 10.2.7. How much gas would have been available from Honor Rancho to deliver into the Southern System on that date?

RESPONSE 10.2:

With respect to the testimony on page 9, lines 11-16, SoCalGas and SDG&E do not believe that either the North-South pipeline nor deliveries from Honor Rancho would have been sufficient to eliminate the curtailment watch or to avoid purchases at the Otay Mesa receipt point. During this event, the level of demand on the Southern System, particularly in the Rainbow Corridor and in San Diego, was very high. In fact, the San Diego demand on January 14 and 15 was 659 and 639 MMcfd, respectively, which exceed the 630 MMcfd capacity of SDG&E system. While SoCalGas had ample supply available on its Northern System, additional supply delivered at Moreno via the North-South pipeline could not be redelivered through the Rainbow Corridor to the SDG&E system – the SDG&E system was simply out of capacity.