

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
NORTH-SOUTH PROJECT REVENUE REQUIREMENT  
(A.13-12-013)  
(2<sup>ND</sup> DATA REQUEST FROM TRANSWESTERN)**

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**QUESTION 1:**

With reference to the Updated Testimony of Mr. Bisi (pp. 10-11, redlined version), please provide the following data regarding the “load centers on the Southern System East of the Moreno Pressure Limiting Station”:

- a. Forecasted core load and connected noncore load in a 1-in-2 year, in a 1-in-4 year, in a 1-in-6 year, in a 1-in-8 year, and in a 1-in-10 year cold day condition, for the year 2019; and
- b. Forecasted core load and forecasted noncore load in a 1-in-2 year, in a 1-in-4 year, in a 1-in-6 year, in a 1-in-8 year, and in a 1-in-10 year cold day condition, for the year 2019.

**RESPONSE 1:**

- a. SoCalGas and SDG&E object to this question on the grounds that it is unreasonably burdensome because it seeks information that does not exist. SoCalGas and SDG&E have not prepared demand forecasts for the requested scenarios, and it would require substantial time and effort to do so. Without waiving this objection, and subject thereto, SoCalGas and SDG&E respond as follows:

SoCalGas and SDG&E have prepared a 1-in-10 cold day forecast for 2020. The 2020 core demand forecast under the 1-in-10 year cold day condition, and the connected large customer noncore load, for the “load centers on the Southern System East of the Moreno Pressure Limiting Station” are 160 MMcfd and 400 MMcfd, respectively.

- b. Please refer to response 1a above. The year 2020 noncore (large and small commercial/industrial customers) demand forecast under the 1-in-10 year cold day condition for the “load centers on the Southern System East of the Moreno Pressure Limiting Station” is 142 MMcfd.

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**QUESTION 2:**

With reference to the Updated Testimony of David M. Bisi in which he discusses the implications of using “connected noncore load” versus “forecasted noncore load”:

- a. What would be the required capacity of the Adelanto- Moreno Line if SoCalGas had used “forecasted noncore load” instead of “connected noncore load” as its planning criterion?
- b. Also, please provide the cost implications for using forecasted load instead of the connected load criterion.

**RESPONSE 2:**

Please refer to Response 15.1 of the 15<sup>th</sup> Data Request from Southern California Generation Coalition in this proceeding, available at:

<http://socalgas.com/regulatory/documents/a-13-12-013/SCGC-15.doc>.

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**QUESTION 3:**

With reference to the Updated Testimony of David M. Bisi in which he states that “eliminating this pipeline does not preclude its construction later” (p. 11, redlined version), please provide an estimated lead time for constructing the Moreno- to-Whitewater pipeline as a separate project sometime in the future, with similar detail and format as in Figure 4 of the Supplemental Testimony of Mr. Buczkowski.

**RESPONSE 3:**

SoCalGas and SDG&E object to this question on the grounds that it is unreasonably burdensome because it seeks information that does not exist. SoCalGas and SDG&E have not prepared the requested schedule because we have no plans to proceed with Moreno-Whitewater. Without waiving this objection, and subject thereto, SoCalGas and SDG&E respond as follows:

SoCalGas and SDG&E are not in a position to provide an estimated lead time for Moreno-to-Whitewater “with similar detail and format” to the Adelanto-to-Moreno pipeline and the Adelanto compressor replacement for the reasons just specified. However, based on recent experience, it appears to us that the necessary elements of a project like this – project definition and planning, engineering and design, regulatory and environmental approvals, permitting, land rights acquisitions, materials procurement, construction, etc. – could take five to seven years from start to finish. Unique circumstances could result in longer or shorter project timelines. .

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**QUESTION 4:**

With reference to the Updated Testimony of Gwen Marelli in which she states that “SoCalGas and SDG&E continue to believe that the proposed Moreno-to-Whitewater portion of the project would be a useful reliability improvement” (p. 24, redlined version):

- a. Did SoCalGas believe, at the time it filed the initial Application in December 2013, that the reliability benefit of the Moreno-to-Whitewater portion of the project exceeded the then estimated cost of \$186.1 million?
- b. If the answer to the above question is “No”, please explain why SoCalGas decided to include the Moreno-to-Whitewater line in its North-South project in its initial application.

**RESPONSE 4:**

- a. Yes.
- b. N/A

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**QUESTION 5:**

With reference to the Updated Testimony of Gwen Marelli in which she states “Instead, we should be able to satisfy such requirements, at least in the short-and-medium term, through means other than physical system improvements” (p. 25), please provide a list and description of “means other than physical system improvements” that SoCalGas would consider proposing to the Commission in future filings.

**RESPONSE 5:**

The tools that SoCalGas initially would consider using to address short-and-medium term requirement needs are covered in the Updated Direct Testimony of Ms. Marelli dated November 12, 2014 (see Section VI). As SoCalGas continues to evaluate these short and medium-term reliability needs, we may consider additional tools, but do not have any other additional tools in mind right now.