

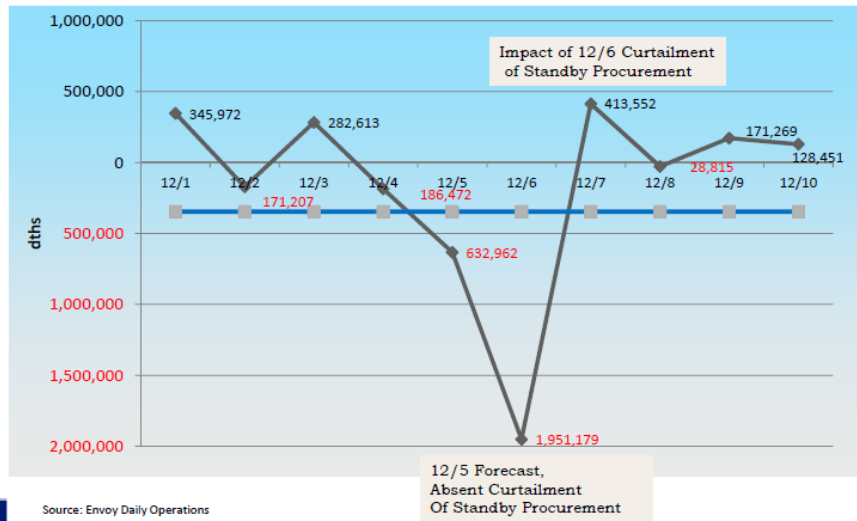
**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
LOW OPERATIONAL FLOW ORDER &
EMERGENCY FLOW ORDER REQUIREMENTS
(A.14-06-021)**

(4TH DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

QUESTION 4.1:

The questions in this data request are all directed at the Prepared Direct Testimony of Steve Watson at page 1, lines 18-19, which states: “In both December 2013 and February 2014, this diversion of flowing supply led to over-reliance on storage withdrawals and pipeline draft to meet demand.⁴” Footnote 4: “Slides 19-22 from the attached Customer Forum Presentation (Attachment A) illustrate this.” A copy of the slides, grouped by day with the associated daily operating data from Envy has been attached below for convenience:

December Storage Withdrawal Used for Balancing



Source: Envy Daily Operations
 Southern California Gas Company
 Sempra Energy utility

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Gas Flow date	Total Receipts	System Sendouts	Total Deliveries	Net Injections / (Withdrawals)	Ending Storage Balance	Total Daily Customer Imbalance	Cumulative Customer Imbalance	Storage Wdr for Cust Balance	Transmission Fuel Use	Composite Weighted Avg Temp
12/1/2013	2719000	2454000	2454000	240000	123929000	343942	-378834	343942	7883	57
12/2/2013	2814000	3039000	3039000	-328000	123619000	-171207	-382310	-171207	8158	56
12/3/2013	2647000	3222000	3222000	-498000	123126000	282613	-300445	282613	7674	50
12/4/2013	2398000	3986000	3986000	-1577000	121588000	-186472	-303223	-186472	6932	46
12/5/2013	1830000	4479000	4479000	-2490000	119190000	-632962	-1163200	-632962	3363	46
12/6/2013	1616000	4329000	4329000	-2832000	116388000	-196811	-1359711	-196811	4683	48
12/7/2013	1631000	4267000	4267000	-2647000	113600000	312325	-1070332	312325	4786	44
12/8/2013	1970000	4524000	4524000	-2324000	111327000	413332	-667344	413332	3711	43
12/9/2013	1891000	3011000	3011000	-2986000	108408000	-28815	-757204	-28815	3482	46
12/10/2013	2286000	4339000	4339000	-2436000	106023000	171269	-390934	171269	6627	49
12/11/2013	2132000	4200000	4200000	-2100000	103978000	128417	-469093	128417	6239	51
12/12/2013	2213000	3970000	3970000	-1636000	102386000	318276	33387	318276	6416	50
12/13/2013	2148000	3847000	3847000	-1718000	100716000	134913	157064	134913	6227	53
12/14/2013	2245000	3257000	3257000	-1028000	99717000	322224	467817	322224	6308	55

- 4.1. With respect to the chart entitled “December Storage Withdrawal Used for Balancing:”
 - 4.1.1. Is it correct to interpret the chart to intend to show recorded figures for all days, December 1-10, except for December 6?
 - 4.1.2. Is it correct to interpret the figure, -1,951,179 dth, shown for December 6 as being based on a forecast and not based on recorded data?
 - 4.1.3. When did SoCalGas complete its forecast of the December 6 storage withdrawal?
 - 4.1.4. Please explain in detail what information SoCalGas relied upon in completing its forecast, that is, what specific sources of data did SoCalGas have available to it on a real time basis as it was completing the forecast.
 - 4.1.5. Please describe SoCalGas’ reasoning based on the sources of data described in the response to previous question that resulted in a forecast of -1,951,179 dth for December 6.
 - 4.1.6. Does the chart correctly show recorded data for December 7-10?
 - 4.1.7. If the answer to the previous question is “no,” please provide a corrected chart in electronic format.

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- 4.1.8. Did the curtailment of standby procurement service succeed in eliminating storage withdrawals for customer balancing during the period, December 7-11, excepting a small amount on December 9?
- 4.1.9. If the answer to the previous question is “no,” please explain why the curtailment of standby procurement service did not result in an elimination of storage withdrawals for customer balancing during that period.

RESPONSE 4.1:

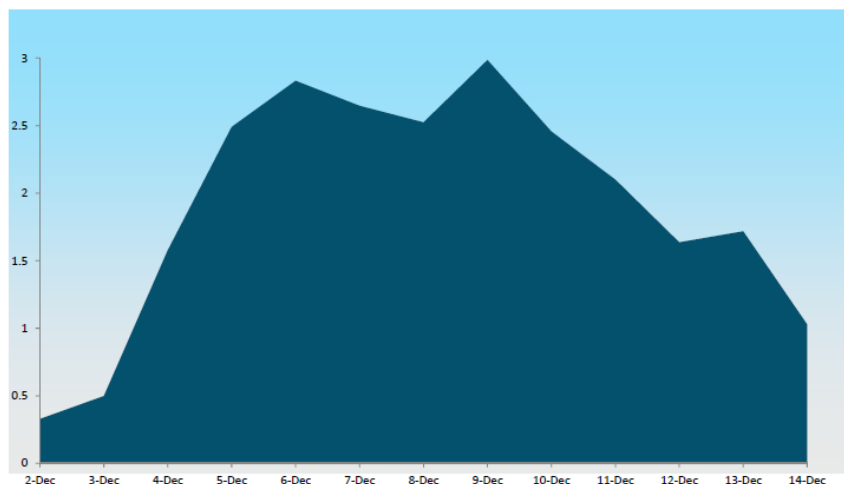
- 4.1.1. Yes.
- 4.1.2. Yes.
- 4.1.3. Between 5-6 A.M. on December 5th.
- 4.1.4. That line in Envoy is calculated as follows: Forecasted receipts minus forecasted sendout minus net scheduled storage account withdrawals.
- 4.1.5. These are elements properly define “forecasted” injection/withdrawal to be used for customer balancing available for cycle 1.
- 4.1.6. Yes.
- 4.1.7. N/A
- 4.1.8. Yes.
- 4.1.9. N/A.

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QUESTION 4.2:

Over-reliance on Storage Withdrawal Dec. 2013



- 4.2. With respect to the chart entitled: “Over-reliance on Storage Withdrawal Dec. 2013:”
- 4.2.1. Does this chart plot the daily “net withdrawals” shown in the Envoy daily operating data for each day, December 2-14, 2013?
 - 4.2.2. If the answer to the previous question is “no,” please describe the data that is plotted in the chart.
 - 4.2.3. Does SoCalGas consider a customer with firm storage inventory and withdrawal rights using that capacity to meet most or all of its burn on a particular day or series of days during December to amount to an “over-reliance on storage withdrawal”?
 - 4.2.4. Does SoCalGas’ response to the previous question change if the customer in question is the core?
 - 4.2.5. Does SoCalGas’ response to the question prior to the previous question rely upon the December inventory balance?

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4.2.6. Please provide for each day, December 2-14, the percentage of the daily net withdrawal represented by “storage withdrawal used for customer balancing”.

RESPONSE 4.2:

4.2.1. Yes.

4.2.2. N/A

4.2.3. No. Per Rule 30.D.4, storage customer nominations are limited to storage capabilities, with firm customers having priority.

4.2.4. No.

4.2.5. Only indirectly. Inventory levels influence total physical withdrawal capacities on a day. Physical withdrawal capability helps to determine whether nominated storage rights need to be prorated per Rule 30.D.4.

4.2.6. Please see the table on the following page.

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Gas Flow date	% of Total WD used for Cust Balancing	% of 340 MMcfd WD used for Cust Balancing
12/2/2013	52%	49%
12/3/2013	0%	0%
12/4/2013	12%	54%
12/5/2013	25%	182%
12/6/2013	7%	56%
12/7/2013	0%	0%
12/8/2013	0%	0%
12/9/2013	1%	8%
12/10/2013	0%	0%
12/11/2013	0%	0%
12/12/2013	0%	0%
12/13/2013	0%	0%
12/14/2013	0%	0%

Note: Curtailment of Standby Procurement affected a portion of Dec 6 flow day and all of Dec 7-11 flow days and radically reduced shippers' reliance on customer withdrawal during the period.

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QUESTION 4.3:

- 4.3. With respect to the chart entitled “February Storage Withdrawal Used for Balancing:”
- 4.3.1. Is it correct to interpret the chart as intended to show recorded figures for all days, February 1-8, except for February 6?
 - 4.3.2. Is it correct to interpret the figure, -1,260,000 dth, shown for February 6 as being based on a forecast and not based on recorded data?
 - 4.3.3. When did SoCalGas complete its forecast of the February 6 storage withdrawal?
 - 4.3.4. Please explain in detail what information SoCalGas relied upon in completing its forecast, that is, what specific sources of data did SoCalGas have available to it on a real time basis as it was completing the forecast.
 - 4.3.5. Please describe SoCalGas’ reasoning based on the sources of data described in the response to previous question that resulted in a forecast of -1,260,000 dth for February 6.
 - 4.3.6. Why didn’t SoCalGas assume that customers would respond on February 7 as they did on February 2 and deliver enough gas to reduce the cumulative customer imbalance, that is, what was different on February 5 than it was on January 31 or February 1 that led SoCalGas to conclude it needed to curtail standby procurement service?
 - 4.3.7. Did the curtailment of standby procurement service succeed in eliminating storage withdrawals for customer balancing during the period, February 6-10?
 - 4.3.8. If the answer to the previous question is “no,” please explain why the curtailment of standby procurement service did not result in an elimination of storage withdrawals for customer balancing during that period.

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RESPONSE 4.3:

4.3.1. Yes.

4.3.2. Yes.

4.3.3. Between 5-6 A.M. on February 5th.

4.3.4. That line in Envoy is calculated as follows: Forecasted receipts minus forecasted sendout minus net scheduled storage account withdrawals.

4.3.5. These are elements properly define “forecasted” injection/withdrawal to be used for customer balancing available for cycle 1.

4.3.6. Cumulative customer imbalances are not very relevant to daily operations. The difference in company reactions can be traced to just over 1 Bcf/d of total net withdrawals being forecasted for Feb 2nd while almost 3 Bcf/d was being forecasted for Feb 6th.

4.3.7. Yes.

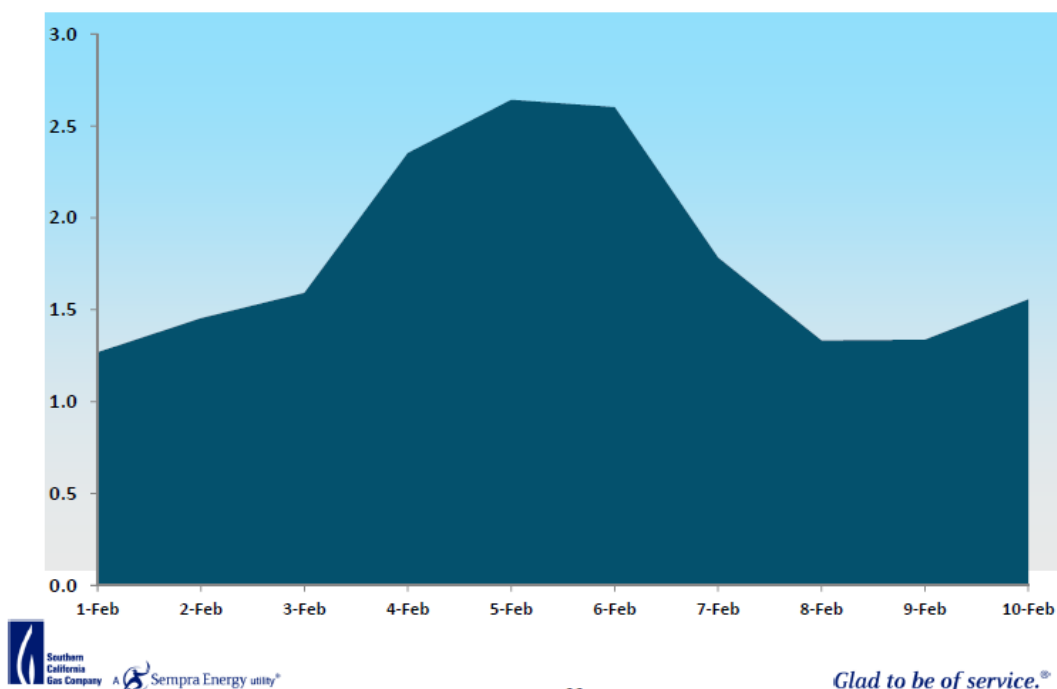
4.3.8. N/A

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QUESTION 4.4:

Over-reliance of Storage Withdrawal – February 2014



4.4. With respect to the chart entitled: “Over-reliance on Storage Withdrawal February 2014:”

- 4.4.1. Does this chart plot the daily “net withdrawals” shown in the Envoy daily operating data for each day, February 2-10, 2014?
- 4.4.2. If the answer to the previous question is “no,” please describe the data that is plotted in the chart.
- 4.4.3. Does SoCalGas consider a customer with firm storage inventory and withdrawal rights using that capacity to meet most or all of its burn on a particular day or series of days during February to amount to an “over-reliance on storage withdrawal”?

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- 4.4.4. Does SoCalGas' response to the previous question change if the customer in question is the core?
- 4.4.5. Does SoCalGas' response to the question prior to the previous question change if total storage inventory is within 20 Bcf of the peak day minimum?
- 4.4.6. Does SoCalGas' response to the previous question change if total storage inventory is within 5 Bcf of the peak day minimum?
- 4.4.7. Please provide for each day, February 2-10, the percentage of the daily net withdrawal represented by "storage withdrawal used for customer balancing".

RESPONSE 4.4:

- 4.4.1. Yes.
- 4.4.2. N/A
- 4.4.3. No. Per Rule 30.D.4, storage customer nominations are limited to storage capabilities, with firm customers having priority.
- 4.4.4. No.
- 4.4.5. No.
- 4.4.6. No.
- 4.4.7. Please see the table on the following page.

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Gas Flow date	% of Total WD used for Cust Balancing	% of 340 MMcfd WD used for Cust Balancing
2/2/2014	0%	0%
2/3/2014	20%	93%
2/4/2014	0%	0%
2/5/2014	3%	24%
2/6/2014	0%	0%
2/7/2014	0%	0%
2/8/2014	0%	0%
2/9/2014	0%	0%
2/10/2014	0%	0%

Note: Curtailment of Standby Procurement Service Feb 6-10th, which was announced on February 5th, radically reduced shipper reliance on customer balancing withdrawal.