**QUESTION 06-01:**

Please provide the following information for each month of the past five calendar years for all of SoCalGas’ storage facilities collectively, separately identifying core, balancing and market storage products.

a. Beginning and ending inventory balances;

b. Average inventory balances;

c. Peak daily withdrawals;

d. Average daily withdrawals;

e. Peak daily injections;

f. Average daily injections.

**RESPONSE 06-01:**

SoCalGas and SDG&E object to this question on the grounds that it requests confidential customer information. Without waiving this objection, and subject thereto, SoCalGas and SDG&E respond as follows: Please see the attached Excel file. Core and market storage products are not identified separately.



**QUESTION 06-02:**

Specify the amount of inventory, withdrawals or injection for Aliso Canyon reflected in responses to Question 06-01(a)-(f).

**RESPONSE 06-02:**

SoCalGas does not sell services by field; therefore only physical storage activity at Aliso Canyon can be quantified.



**QUESTION 06-03:**

a. What is SoCalGas’ most current estimate regarding how long Aliso Canyon will be unavailable for injection, withdrawal and inventory?

b. Please identify all factors that could affect the period during which Aliso Canyon will be unavailable.

**RESPONSE 06-03:**

1. SoCalGas does not have a current estimate regarding future Aliso Canyon availability.
2. Future Aliso Canyon availability will depend on how long it takes SoCalGas to satisfy the battery of tests the California Division of Oil, Gas and Geothermal Resources (DOGGR) is requiring at each Aliso Canyon well before DOGGR will approve injections through that well. In addition, Aliso Canyon availability could be affected by pending legislation.

**QUESTION 06-04:**

How will removing Aliso Canyon from service affect the number of curtailment events in the SoCalGas service territory?

a. Please state whether the removal of Aliso Canyon from service will increase the number of curtailment events compared with the number of events over the past two years?

b. To what extent will the removal of Aliso Canyon from service increase curtailments? Please quantify the extent of potential increases in curtailment.

c. Please provide all studies, analyses, assessments, communications or other documents that evaluate the effect of removing Aliso Canyon from service on the number and extent of curtailment events.

d. If the answer to Question 06-04(a) is “yes,” will the increase in curtailment events affect SoCalGas proposed curtailment zones differentially? Please explain your response and indicate which, if any, zones is more likely to be affected.

e. If there is no differential impact among curtailment zones, please describe how SoCalGas’ proposed curtailment protocols would apply in events caused by supply shortfall due to unavailability of withdrawal from Aliso Canyon.

f. What factors will affect the severity of the increase in curtailment events resulting from the removal of Aliso Canyon from service?

**RESPONSE 06-04:**

1. SoCalGas and SDG&E do not forecast curtailments.
2. The removal of Aliso Canyon from service could increase the risk of curtailment to customers. The extent of such increased risk would depend upon customer load and system operating conditions.
3. SoCalGas and SDG&E object to this question to the extent that it requests information protected by the attorney/client privilege or the attorney work product doctrine. No information protected by this privilege and doctrine will be knowingly disclosed.
4. See Response 06-04(a).
5. See Response 06-04(a).
6. The timing and level to which Also Canyon may be partially brought back to service could impact the severity of any increase in curtailment risk.

**QUESTION 06-05:**

If the response to Question 06-04(a) was “yes,” please identify all mitigation measures considered by SoCalGas to mitigate any increase in curtailment.

1. If SoCalGas has considered mitigation measures, please provide all studies, analyses, assessments, communications or other documents discussing such measures.
2. If SoCalGas has quantified the relative costs of these mitigation measures, please provide all studies, analyses, assessments, communications or other documents discussing such costs.

**RESPONSE 06-05:**

SoCalGas and SDG&E intend to submit a proposal to the Commission in the near future for temporary daily balancing. SoCalGas and SDG&E have not attempted to quantify the cost of this proposal. However, if customers stay within the proposed tolerances, they would not pay any additional noncompliance charges.

**QUESTION 06-06:**

In response to Indicated Shippers 01-02(c) Sempra states “SoCalGas and SDG&E briefed CAISO on our proposed curtailment protocols before the application was filed.”

a. Did CAISO provide SoCalGas and SDG&E feedback on their proposed curtailment protocols?

b. If the answer to 06-06(a) is yes, was this feedback written or verbal?

c. If the answer to 06-06(b) is written, please provide the CAISO written feedback.

**RESPONSE 06-06:**

1. Yes.
2. Verbal.
3. N/A.

**QUESTION 06-07:**

In response to Indicated Shippers 02-05(c) Sempra states: “The 60% proposal appears equitable to SoCalGas and SDG&E.”

a. Did Sempra consider any other proposals than 60%?

b. If the answer to 06-07(a) is yes, what other proposals did Sempra consider?

c. Please explain why 60% “appears” more equitable than the other proposals considered?

d. If the answer to 6-07(a) is no, please explain on what basis 60% is equitable.

**RESPONSE 06-07:**

SoCalGas and SDG&E determined the 60% proposal through scenario analysis. 60% was determined to be equitable because this level of cut to electric generators in the winter could be met with increases in imported electricity. See page 7 of Mr. Watson’s prepared direct testimony.

**QUESTION 06-08:**

In response to Indicated Shippers 02-06 Sempra states that “other alternatives for establishing a customers’ CBQ were not considered because we believed peak usage was the appropriate benchmark.”

1. Please explain why Sempra believes that peak usage is the appropriate benchmark.
2. How did SoCalGas reach the conclusion in 06-08(a) without considering other benchmarks?
3. What other benchmarks could possibly be used for the same purpose of the CBQ (e.g. average usage)?

d. For each benchmark identified in 06-08(c) please describe why the proposed CBQ methodology is preferable to the potential alternatives.

**RESPONSE 06-08:**

1. SoCalGas expects most customers to be familiar with their peak consumption and be able to reduce gas usage from that amount by a certain percentage to achieve compliance with a curtailment order.
2. The current process for determining authorized curtailment quantities is based on monthly contract quantities, which is based on peak consumption. Customers are already familiar with that number. It was not our intent to change this part of the curtailment rules.
3. See Response to Indicated Shippers Data Request 04-05.
4. See Response 06-08(a) through (c).

**QUESTION 06-09:**

In response to Indicated Shippers 02-07(a)(3) Sempra states: “SoCalGas and SDG&E do not forecast curtailments.” In response 07-01(a)(1), SoCalGas explains that planned maintenance was the reason for many of the outages in the South LA Basin. Meanwhile, in response to Indicated Shippers 05-03(b) Sempra states: “Planned maintenance and schedules may be from seven days to two years in advance.”

a. To the extent that SoCalGas or SDG&E plans a maintenance project can it predict whether the planned maintenance will result in a curtailment?

b. If the answer to 06-09(a) is yes, wouldn’t SoCalGas and SDG&E be able to use this information to forecast curtailments? We would be able to anticipate some maintenance related curtailments, specifically those that involve a large capacity reductions to the local system.

c. If the answer to 06-09(a) is no, what prevents SoCalGas and SDG&E from using planned maintenance schedules to forecast potential curtailments?

**RESPONSE 06-09:**

1. Yes. Required curtailments can be determined for the type of work done. However, the accuracy and schedule of this is dependent on gas supply, weather, demand, construction schedules of dependent projects, availability of parts and materials, permitting, etc. at the time of the planned maintenance, and therefore SoCalGas and SDG&E do not forecast curtailments with any guaranteed time.
2. SoCalGas would be able to anticipate some maintenance related curtailments, specifically those that involve large capacity reductions to the impacted local system.
3. N/A.

**QUESTION 06-10:**

In response to Indicated Shippers 03-01(b) Sempra states that safety concerns on customer sites are included within the scope of concerns that the curtailment rules seek to address.

a. What customer site safety concerns does Sempra consider?

b. How did Sempra identify customer site safety concerns?

c. Did Sempra utilities consult with any customers to identify customer site safety concerns?

d. If the answer to Question 06-10(c) is yes, what types of customers did Sempra consult with (e.g., core or non-core, industrial, Electric Generator).

e. How did the customer site safety concerns identified by Sempra impact the design of the curtailment rules?

**RESPONSE 06-10:**

a. Operating emergencies declared by customers.

b. Customer operating emergencies vary. Current provisions in SoCalGas Rule 23 and Rule 14 have provided adequate leeway for SoCalGas and SDG&E to allow customers declaring emergencies to continue using gas service or not depending on the immediate situation. The decision was made to retain this provision.

c. No. Pre-filing customer briefings did not raise any new specific concerns.

d. The proposal was presented at the 2015 Annual Customer Forum.

e. See Response 06-10.b

**QUESTION 06-11:**

In response to Indicated Shippers 03-01(d) Sempra states that “[i]f demand is determined to exceed the capability of the system to safely operate, a curtailment is ordered to reduce demand.” Please explain what Sempra means by “safely operate” within the context of this statement.

**RESPONSE 06-11:**

Safely operate means maintaining pressure within operating limits and sufficient throughput on the system to maintain service to higher priority core customers.

**QUESTION 06-12:**

In response to Indicated Shippers 03-04 Sempra highlights the testimony of David Bisi which states “SoCalGas and SDG&E will also propose facility improvements if noncore customer curtailment in a particular zone becomes frequent.”

a. At what point does customer curtailment in a particular zone become frequent?

b. Over what duration of time is curtailment frequency measured (e.g. a month, a year)?

c. Would 2 curtailments in the same zone in the same month be considered frequent?

d. Would 5 curtailments in the same zone in the same month be considered frequent?

e. Would 10 curtailments in the same zone in the same month be considered frequent?

f. Would 2 curtailments in the same zone in the same year be considered frequent?

g. Would 5 curtailments in the same zone in the same year be considered frequent?

h. Would 10 curtailments in the same zone in the same year be considered frequent?

i. Would 15 curtailments in the same zone in the same year be considered frequent?

**RESPONSE 06-12:**

As stated in the Prepared Direct Testimony of David Bisi, “SoCalGas and SDG&E have not made any determination of what level of curtailment frequency would trigger a proposal for facility improvement in a particular zone, and would look towards the impacted customers to help define that frequency and support facility improvement before the Commission.”

**QUESTION 06-13:**

1. How many curtailment watches has Gas Control called in the last two years?

b. How many of the curtailment watches issued in the last two years have resulted in a curtailment event?

**RESPONSE 06-13:**

1. There were three curtailment watches in the last two years.
2. One of those curtailment watches resulted in a curtailment event.

**QUESTION 06-14:**

The following questions follow up on the response to Indicated Shippers Data Request 04-03 regarding the proposed local curtailment zones.

a. What SoCalGas department originally developed the zones?

b. Did Sempra management specifically review the local curtailment zones when reviewing this application?

c. Have the local zones changed in size or physical attributes since first developed and used within the Sempra organization?

d. Since the zones were first developed, have zones been created or eliminated?

e. Were any changes made to the size or physical attributes of the zones in the development of this proposal?

f. If the answer to Question 06-14(e) is yes, what changes were made?

**RESPONSE 06-14:**

All of these questions are answered in Response 04-03.

**QUESTION 06-15:**

In response to Indicated Shippers 05-03 (a), Sempra states that “SoCalGas account representatives work with customers when possible to determine a mutually convenient time for the curtailment.”

a. Does SoCalGas have a formal process for coordinating curtailment with customers?

b. What percentage of the time do account representatives have the opportunity to work with customers to determine a mutually convenient time for a curtailment? We do not track this data

**RESPONSE 06-15:**

1. Customers to be curtailed are alerted by their account representatives prior to planned maintenance curtailments. Each event is handled on a case-by-case basis
2. Account representatives work with customers on almost all PSEP and pipeline integrity projects to try find a mutually convenient time to conduct maintenance-related curtailments.

**QUESTION 06-16:**

Please provide (in the format presented in Attachment 06-16) the following information for the “Local Zones” shown on page 2 of Witness Nguyen direct testimony in Table 1:

a. The “Sum of Summer Peaks” enumerated by individual NAICS six digit code; and

b. The “Sum of Winter Peaks” enumerated by individual NAICS six digit code.



**RESPONSE 06-16:**

SoCalGas and SDG&E object to this request on the grounds that it seeks confidential customer information. Data by NAICS code and by zone is not sufficiently aggregated. Without waving thisr objection and subject thereto, SoCalGas and SDG&E respond as follow:

Please see the following table for a listing of summer and winter peaks for those NAICS codes that are sufficiently aggregated.

|  |  |  |
| --- | --- | --- |
|   | Sum of Summer PeakMMcfd | Sum of Winter PeakMMcfd |
| **North LA Basin** |  |  |
| General Medical and Surgical Hospitals  |  |  |
| 622110 | 12.7929 | 14.4049 |
| **South LA Basin** |  |  |
| General Medical and Surgical Hospitals  |  |  |
| 622110 | 6.4815 | 7.3842 |
| **Valley** |  |  |
| Crude Petroleum and Natural Gas Extraction  |  |  |
| 211111 | 55.8704 | 46.4221 |