

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(12<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

**Date Requested: February 28, 2017  
Date Responded: March 14, 2017**

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**PRELIMINARY STATEMENT**

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas do not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
6. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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**GENERAL OBJECTIONS**

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for SCGC as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of SCGC's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

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**QUESTION 12.1:**

12.1. In their response in A.13-12-013, to SCGC-10, Q.10.2, the Applicants stated that:

“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.”

However, in their response to Sierra Club Request 4, Q.7, the Applicants stated that:

The SDG&E system experienced a send out of 674 MMcfd on January 14, 2013. This send out was served with 530 MMcfd and 128 MMcfd of supply delivered into Lines 3010 and 1600, respectively, at Rainbow Meter Station. In addition, 1 MMcfd was supplied by Line 1026 and the system was drafted by 15 MMcf. No supply was received at Otay Mesa.

- 12.1.1. Please state which version of the January 14, 2013 demand is correct and identify the total amount of send out for that day.
- 12.1.2. Please breakdown the January 14, 2013, send out between core and noncore.
- 12.1.3. Please confirm that the send out was 639 MMcfd on January 15, 2013 or provide a corrected figure.
- 12.1.4. Please breakdown the January 15, 2013, send out between core and noncore.

**RESPONSE 12.1:**

- 12.1.1 The data provided in response to SCGC-10, Q.10.2 issued in A.13-12-013 were volumes delivered from SoCalGas to SDG&E through the meters supplying the SDG&E system and lacked the SDG&E system pack and draft, as is evident in the response provided in Sierra Club DR 4, Q7. SDG&E’s customer demand was 674 MMcfd on January 14, 2013: 364 MMcfd for core and 310 MMcfd for noncore.
- 12.1.2 Please refer to the response to Question 12.1.1 above.

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- 12.1.3 The data provided in response to SCGC-10, Q.10.2 issued in A.13-12-013 were volumes delivered from SoCalGas to SDG&E through the meters supplying the SDG&E system and lacked the SDG&E system pack and draft. The SDG&E customer demand on January 15, 2013 was 614 MMcfd: 337 MMcfd for core and 277 MMcfd for noncore, with 25 MMcfd packed.
- 12.1.4 Please refer to the response to Question 12.1.3 above.

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**QUESTION 12.2:**

Please provide a complete, working Excel version of the Workpaper Table Avoided Cost Model that was provided as a workpaper to the Attachment B: Cost-Effectiveness Analysis (Corrected February 2017) that was included with the Supplemental Testimony served on February 21, 2017. As defined in this data request, a complete working Excel model contains all formulas and links to other working Excel models as well as all data directly input into the model.

**RESPONSE 12.2:**

The Excel version of the Cost-Effectiveness Analysis – Avoided Cost Model workpaper corrected February 2017 is attached.

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**QUESTION 12.3:**

Please provide a complete, working Excel version of all Excel workbooks that are directly linked to the Avoided Cost Model either providing an input to the model or receiving an output from the model.

**RESPONSE 12.3:**

As Applicants indicated in their response to SCGC DR 2, Q2, there are no linked Excel workbooks for the Avoided Cost Model.

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**QUESTION 12.4:**

Please provide a complete, working Excel version of the Workpaper Table Scenario Analysis Model that was provided as a workpaper to the Attachment B: Cost-Effectiveness Analysis (Corrected February 2017) that was described previously.

**RESPONSE 12.4:**

The Excel version of the Cost-Effectiveness Analysis – Scenario Analysis Model workpaper corrected February 2017 is attached.

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**QUESTION 12.5:**

Please provide a complete, working Excel version of all Excel workbooks that are directly linked to the Scenario Analysis Model either providing an input to the model or receiving an output from the model.

**RESPONSE 12.5:**

As Applicants indicated in their response to SCGC DR 2, Q4, there are no linked Excel workbooks for the Scenario Analysis Model.

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**QUESTION 12.6:**

12.6. With respect to the Applicants' response to SCGC-03, Q.3:

12.6.1. Please state what energy efficiency forecast was used for projecting the natural gas savings reflected in the 2016 CGR forecast.

12.6.2. Please provide a copy of the natural gas energy efficiency forecast that is referred to in the previous response.

**RESPONSE 12.6:**

12.6.1 SDG&E used the CEC's AAEE 2013 forecast that was revised in April 2014.<sup>1</sup> Because energy efficiency savings for the historical years 2013-2015 had already been realized through reduced gas consumption, only forecasted energy efficiency savings for 2016 and subsequent years were used in creating the 2016 CGR forecasts.

12.6.2 Please see the attached file.

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<sup>1</sup> See [http://www.energy.ca.gov/2013\\_energypolicy/documents/demand-forecast\\_CMF/Additional\\_Achievable\\_Energy\\_Efficiency/](http://www.energy.ca.gov/2013_energypolicy/documents/demand-forecast_CMF/Additional_Achievable_Energy_Efficiency/)

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**QUESTION 12.7:**

- 12.7. With respect to the Applicants response to SCGC-11, Q.11.4.4, which states: “On Page 117 of the 2016 California Gas Report, SDG&E indicates that the cumulative net load impact includes all energy efficiency programs from SDG&E’s integrated gas and electric efficiency programs. The programs were authorized by the Commission in D.15-10-028.”
- 12.7.1. Please provide in tabular format the underlying data for the graph on page 118 of the 2016 California Gas Report, entitled “SDG&E’s Annual Energy Efficiency Cumulative Savings Goal (MMcf).
- 12.7.2. Please explain why a portion of the energy efficiency savings, shown in red on the graph, appears to be negative.
- 12.7.3. Please break down the data provided in response to the previous question between electricity efficiency savings and natural gas efficiency savings.
- 12.7.4. Please show how SDG&E determined the gas savings associated with the electricity efficiency savings programs.

**RESPONSE 12.7:**

- 12.7.1 The graph on page 118 of the 2016 CGR was based on earlier forecasts of energy efficiency savings. Subsequent to the preparation of these forecasts, revised energy efficiency forecasts were developed. These revised energy efficiency forecasts were then used in preparing the final 2016 CGR forecasts. Inadvertently, the graph on page 118 of the 2016 CGR was not updated. The attached data and graph correspond to the revised energy efficiency forecasts. This information supersedes the information contained in the graph on page 118 of the 2016 CGR.
- 12.7.2 Negative gas savings result from the interactive effects between high efficiency lighting and HVAC load. High efficiency lighting emits less ambient heat than lower efficiency lighting resulting in increased space heating load. For SDG&E’s residential customers, the increase in gas demand for space heating due to the lighting interactive effects is greater than the combined savings from other gas energy efficiency measures.
- 12.7.3 Attached is a worksheet showing the SDG&E energy efficiency residential lighting electric and gas savings for program years 2013-2015. The table shows the

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interactive effects and negative gas savings associated with the positive electric savings due to energy efficiency measures.

- 12.7.4 The source of the electric and gas energy efficiency savings for all SDG&E program measures are from either the CPUC's DEER database or from hundreds of workpapers submitted to and approved by the CPUC. The DEER database is a publicly available database of common energy efficiency measures with savings values that have been pre-approved by the CPUC. For less common measures that are not in DEER or customer site-specific projects, workpapers are developed to determine the savings. These workpapers are reviewed and approved by the CPUC before use by the energy efficiency programs. The program savings are reported to the CPUC on an annual basis in the SDG&E Energy Efficiency Annual Report that is filed on May 1 of each year. These annual reports are available at the CPUC's EEstats website in the "Regulatory/Filed Reports" section (<http://eestats.cpuc.ca.gov/Default.aspx>).