

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(22nd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

**Date Requested: June 22, 2017
Date Responded: June 30, 2017**

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 22.1:

Regarding the rebuttal testimony of Mr. Chaudhury, Exhibit SDGE-13 at 65, Mr. Chaudhury states: “SDG&E imports a significant share of its electricity from facilities that are not located in SDG&E’s service territory and do not receive gas from SDG&E.” Please provide for each of the years 2011-2015:

- 22.1.1. SDG&E’s imports of electricity in MWh from specified gas-fired generation,
- 22.1.2. SDG&E’s imports of electricity in MWh from specified renewable resources,
- 22.1.3. SDG&E imports of electricity in MWh from non-gas-fired, non-renewable resources—
please specify source by generation type,
- 22.1.4. SDG&E’s total imports in MWh, and,
- 22.1.5. for the data provided in response to the sub-questions above, the workpapers showing
the derivation of the responses with links and formulas intact.

RESPONSE 22.1:

- 22.1.1. SDG&E does not have the ability to breakdown SDG&E’s imports in terms of actual MWh from gas-fired generation, renewable resources, non-gas-fired, and non-renewable resources.
- 22.1.2. See the response to Question 22.1.1 above.
- 22.1.3. See the response to Question 22.1.1 above.
- 22.1.4. SDG&E’s total imports in MWh for the years 2011-2015 are:

	2011	2012	2013	2014	2015
SDG&E total imports (MWh)	1.41x10 ⁷	1.14x10 ⁷	1.11x10 ⁷	1.25x10 ⁷	1.20x10 ⁷

- 22.1.5. The SDG&E Import total is calculated as the sum of the energy (MWh) South of San Onofre measured at San Onofre, TL 50001 measured at Miguel 500kV, TL 50003 flow measured at Suncrest 500kV, and TL 23040 flow measured at Otay Mesa 230kV.

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QUESTION 22.2:

In the rebuttal testimony of Mr. Bisi, Exhibit SDGE-13 at 75, Mr. Bisi says that in February 2017, SoCalGas requested that LADWP “curtail operations at a single power plant so that repairs could be made on SoCalGas pipelines in the area.” Mr. Bisi states further: “SoCalGas was informed that the operation of the power plant was critical for LADWP’s reliability, even during the winter season....”

- 22.2.1. Please provide a copy of the curtailment notice referenced by Mr. Bisi.
- 22.2.2. Please provide a copy of the LADWP response referenced by Mr. Bisi.

RESPONSE 22.2:

SoCalGas did not issue a curtailment notice to LADWP for February 2017. The SoCalGas Account Manager and LADWP operations personnel communicated verbally about LADWP’s ability to fully curtail a single plant to accommodate a pipeline project planned in March, at which time LADWP stated that it could not fully curtail the operations of its power plant without jeopardizing its system reliability, in conflict with statements made by LADWP in the Winter Technical Report referenced by SCGC’s witness. SoCalGas then posted the attached curtailment notice for this pipeline project on Envoy and provided LADWP with non-zero curtailment volumes for its power plant. SoCalGas is unable to provide further communication between itself and its customer without the express written consent of that customer. To the extent Question 22.2 can be interpreted as requiring SDG&E and SoCalGas (Applicants) to identify or produce any document or set forth any information which is in the possession, custody, or control of SCGC or otherwise, that has been available to or is otherwise equally accessible to SCGC, Applicants objects hereto.

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QUESTION 22.3:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 136, Mr. Borkovich states: “The Utilities previously prepared a draft RFO for binding offers for firm delivery rights to the Otay Mesa receipt point and provided it to Energy Division for review in July 2016.” Please provide the RFO that the Utilities provided to the Energy Division.

RESPONSE 22.3:

SDG&E and SoCalGas (Applicants) object that Question 22.3 calls for information related to a Request for Proposals (RFP)/Request for Offers (RFO) deemed by the Administrative Law Judge (ALJ) as not permitted in this proceeding as of June 30, 2017. The Applicants will not provide or distribute these materials without further direction from the assigned ALJ or Commissioner. Without waiving and subject to their objections, Applicants respond as follows.

On June 28, 2016 Applicants met with Energy Division staff and consultants, during which Applicants expressed concerns with providing an “opinion” about firm delivery of gas to SDG&E’s Otay Mesa receipt point for a number of reasons. To begin, Applicants do not own or operate the gas transmission lines that would deliver gas to Otay Mesa under the Otay Mesa Alternatives. Applicants previously estimated the cost of delivering 400 MMcfd to Otay Mesa based on an estimated cost of constructing new pipeline facilities to expand the Mexico pipeline system, as it does not appear that 400 MMcfd of capacity would exist without expansion of the existing pipelines. However, Applicants do not know if the owners, operators, or other contracted users of such pipelines might be able to provide firm delivery of gas in smaller quantities for a period of time. Applicants expressed the concern at the June 28 meeting that Sempra affiliates own certain of the relevant pipelines and, given the Commission’s rules on affiliate transactions, Applicants do not believe it is appropriate to contact such affiliates without specific Commission direction to do so.

Based on the discussion with Energy Division staff on June 28, 2016 Applicants prepared a draft RFP for deliveries to the Otay Mesa receipt point for review and input by Commission management and Legal Division. Applicants asked Energy Division to confirm with Commission management and Legal Division that an RFP is necessary and appropriate for purposes of Energy Division’s review process, and that the parameters included in the solicitation template will solicit the desired information.

As stated in SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at 51, the RFP was briefly discussed at the Prehearing Conference (PHC) on September 22, 2016. Specifically, ALJ Kersten acknowledged that “an RFP to explore multiyear firm capacity...[is] probably

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premature and tampering with the market. By going out there and asking for feedback is a way of influencing the market, and anything that may come back may not even be real because it's nonbinding." PHC Transcript at page 98, lines 10-16.

Applicants' position has been consistent with the views expressed by the ALJ during the PHC and Applicants would advise SCGC that a Commission-authorized RFP issued strictly for informational purposes will probably not get the same consideration that an RFP issued under Commission authority with clearly stated requirements for its approval will.

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QUESTION 22.4:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 136, Mr. Borkovich presents Table 3, Available Firm Capacity for North BC Pipeline System.” Please provide references for the sources of the information provided in Table 3 for North Baja and Gasoducto Rosarito.

RESPONSE 22.4:

The rates for the North Baja Pipeline were obtained from the North Baja Pipeline, LLC FERC Tariff sheet, First Revised Vol. No. 1, Part 4.1, 4.1 Statement of Rates, FTS-1, ITS-1, PAL-1 Rates & ACA Surcharge v. 3.0.0. Superseding v. 2.0.0., issued 7/25/2013, effective 10/1/2013.

The rates for the Gasoducto Rosarito pipeline (“GR”) were obtained from the GR tariff sheet, dated 2/28/2017, Diario Oficial (Sexta Seccion) 95. (The rates were converted to dollars based on the then current exchange rate.)

The rates for the Transportadora de Gas Natural pipeline (“TGN”) were obtained from the TGN tariff sheet dated 1/31/2017, Diario Oficial (Cuarta Seccion) 110. (The rates were converted to dollars based on the then current exchange rate.)

As for the available capacity for North Baja pipeline, it was obtained from North Baja pipeline’s Informational Postings webpage for “Unsubscribed Capacity.” For the available firm capacities for GR and TGN, those capacities were provided by email from Areli Covarrubias, Gerente Comercial, with IEnova Mexico dated 6-1-2017.

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QUESTION 22.5:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 148, Mr. Borkovich presents Table 5, "Cost to Reserve Firm Capacity at ECA."

- 22.5.1. Please provided the workpapers for the data presented in Table 5 with links and formulas intact.
- 22.5.2. Please identify the sources for the data presented in Table 5.

RESPONSE 22.5:

22.5.1 See attached spreadsheet for the Table 5 calculations. Please note that the figures provided in SDGE-13 at 148, Table 5 have minor corrections. As such, Mr. Borkovich's rebuttal testimony (SDGE-13 at 148, Table 5) will be updated to reflect the actual figures as shown in the excel spreadsheet when he testifies.

22.5.2 Outage Scenarios and corresponding Otay Mesa Delivery quantities were taken from SDGE-12 Supplemental Testimony of SDG&E and SoCalGas (Borkovich) at page 41

Required MSQ is calculated by dividing the Otay Mesa Delivery Quantities by the ECA MaxDDQ percentage of MSQ limitation (18.86%).

The Daily Demand Charge is calculated by multiplying the Required MSQ times the Firm Base Charge listed on Table 4 times a factor of 1,000 (1 MDth = 1,000 Dth). The Annual Revenue Requirement is calculated by multiplying the Daily Demand Charge times 365.

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QUESTION 22.6:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 148, Mr. Borkovich states: “In February 2011, the SoCalGas Operational Hub was able to purchase gas supply that originated from ECA when gas supply at Ehrenberg was not available in sufficient quantities to meet Southern System demand.” Please provide the dates for which the SoCalGas Operational Hub was able to purchase gas supply that originated from ECA, the quantities purchased for each date, and the price.

RESPONSE 22.6:

Please see the response to SCGC Data Request No. 14 Question 9 for the dates, quantities and prices paid for this supply.

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QUESTION 22.7:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 149, Mr. Borkovich states: “At the time these purchases were made, the Utilities’ backbone transportation service (BTS) Shippers were making sporadic deliveries to Otay Mesa. This activity indicated that LNG deliveries were being made to ECA in sufficient quantity to allow for the sale of gas that was stored at the facility.”

- 22.7.1. Please identify the quantities that BTS shippers were delivering and the dates of the deliveries.
- 22.7.2. Please identify the characteristics of the deliveries that lead Mr. Borkovich to conclude that “LNG deliveries were being made to ECA.”

RESPONSE 22.7:

- 22.7.1. Please see the attached spreadsheet for the dates and quantities of Otay Mesa deliveries since 2008.
- 22.7.2. Mr. Borkovich believes that it is not reasonable to expect that EPNG South Mainline shippers or SoCalGas and SDG&E customers would pay the extra cost to deliver gas at Otay Mesa when those deliveries could be made directly to the SoCalGas and SDG&E system at Ehrenberg instead. The only circumstances for EPNG South Mainline to Otay Mesa deliveries would be the result of orders from the System Operator to Gas Acquisition or the Operational Hub to make these deliveries to ensure system integrity or by SDG&E customers wanting to maintain service during a planned system outage that curtailed transportation service from Rainbow.

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QUESTION 22.8:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 157, Mr. Borkovich states: "SCGC believes that the costs for these alternatives somehow need to be imposed on core customers." Please provide a citation to SCGC testimony stating that "SCGC believes that the costs for these alternatives somehow need to be imposed on core customers."

RESPONSE 22.8:

Witness Borkovich came to this conclusion when SCGC Witness Yap offered solutions for system reliability that she assigned to Gas Acquisition despite the current requirement that system reliability is the responsibility of the System Operator and Operational Hub per the Commission's Omnibus Order and SoCalGas Rule 41.

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QUESTION 22.9:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 158, Mr. Borkovich states: "Acquiring the right to be an interruptible shipper on the North Baja/Gasoducto Rosarito/TGN path requires an agreement with two affiliates, Gasoducto Rosarito and TGN. Affiliate Compliance rules require Commission approval of those relationships which last occurred on June 25, 2015." Please provide the document that provided the Commission approval on June 25, 2015.

RESPONSE 22.9:

Please see attached Resolution G-3502.

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QUESTION 22.10:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 158, Mr. Borkovich states: "During the EPNG South Mainline system emergency in February 2011, the Operational Hub was able to make limited purchases of supply from an independent party who the Utilities believe was selling gas from ECA before it became 21 unavailable." Please identify the characteristics of the deliveries that lead Mr. Borkovich to conclude that the gas was from ECA.

RESPONSE 22.10:

The conclusion was based on statements made by the seller to the Operational Hub at the time of purchase and the unavailability of incremental supply on the EPNG South Mainline during the crisis.

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QUESTION 22.11:

In the rebuttal testimony of Mr. Borkovich, Exhibit SDGE-13 at 158, Mr. Borkovich states: “This restriction limits the Utilities’ ability to make direct spot purchases with North Baja gas suppliers since then because it now appears that Sempra Energy affiliates are the only major suppliers operating there at this time.” Please provide the reports or other information upon which Mr. Borkovich relies in stating “that Sempra Energy affiliates are the only major suppliers operating there at this time.”

RESPONSE 22.11:

The IEnova Annual Report indicates that IEnova LNG is the only contracted shipper at ECA who is making LNG deliveries on a regular basis.