

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER
VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN
CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE
DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CAUSE-SCG-08)
Date Requested: May 13, 2025, Due: May 28, 2025**

QUESTION 1:

SoCalGas response to Data Request CAUSE-SCG-06, Q.2 provides actual customer demand on the North Coastal System for 2023. Please provide an update to this response that provides actual customer demand on the North Coastal System by customer class for all of 2024.

RESPONSE 1:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 et seq.; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

In order to determine whether information was sufficiently aggregated to comply with applicable confidentiality laws, a 15/15 Rule analysis was applied. The 15/15 Rule comes from the Public Utilities Commission's decisions setting forth a mechanism for assessing whether customer usage data is sufficiently aggregated to protect customer confidentiality. The 15/15 Rule generally provides that aggregated or anonymized customers' specific information must be made up of at least 15 customers and a single customer's load must be less than 15% of an assigned category. If the number of customers in the compiled data is less than 15, or if a single customer's load is more than 15% of the total data, the 15/15 Rule provides for combining categories or removing non-conforming customer information before the information is released, or otherwise protecting the customer information from public disclosure. Accordingly, the noncore customer classes (noncore C&I, enhanced oil recovery (EOR) and electric generation (EG)) actual customer demand data is aggregated.

	Residential	Core C&I	Noncore	Total
2024 Total	8,814,056 MCF	5,759,313 MCF	4,981,444 MCF	19,554,814 MCF

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QUESTION 2:

SoCalGas response to Data Request CAUSE-SCG-06, Q.3 provides average winter daily demand in MMcfd on the North Coastal System for 2023. Please provide an update to this response that provides average winter daily demand in MMcfd for 2024.

RESPONSE 2:

SoCalGas objects to this request on the grounds it is compound and argumentative. SoCalGas additionally objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Average Winter Daily MMcfd	
YEAR	TT_MMcfd
2024	70.06

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QUESTION 3:

SoCalGas response to Data Request CAUSE-SCG-03, Q.5(c) provides the average daily summer demand on the North Coastal System by customer class from 2014 to 2023. Please provide an update to this response that provides average summer daily demand in MMcfd for 2024.

RESPONSE 3:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it seeks confidential customer data protected under privacy laws. (See Cal. Civil Code §§ 1798.80 et seq.; Cal. Pub. Util. Code § 8380(d); D.11-07-056; D.12-08-045; D.14-05-016; SoCalGas Tariff Rule No. 42.) Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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Average Summer Daily MMcfd				
YEAR	Residential	Core C&I	Noncore	TT_MMcfd
2024	17.08	13.22	12.96	43.26

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QUESTION 4:

Please identify all Power Safety Power Shutoffs (PSPS) that resulted in a loss of electric service at the Ventura Compressor Station from July 1, 2022 to the present and the duration of each loss of electric service. (Please note SoCalGas provide this information from 2017 to July 2022 in response to Data Request CEJA-SEU-001 in A.22-05-015).

RESPONSE 4:

The Southern California Edison (SCE) system experienced multiple PSPS events since July 2022 that resulted in partial shutdowns of circuits in the Ventura County Area. None of these PSPS events resulted in a loss of power at the Ventura Compressor Station. However, Ventura Compressor Station has experienced multiple power outages that were related to SCE system maintenance from July 1, 2022, to present.