

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO
GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE
2024 COST ALLOCATION PROCEEDING**

(A.22-09-015)

**(DATA REQUEST SET 10 FROM SOUTHERN CALIFORNIA GENERATION
COALITION DATED May 11, 2023)**

SOCALGAS RESPONSE DATED: MAY 25, 2023

Question 10.1:

10.1. Do the cumulative customer imbalance figures provided for 2018-2022 in response to SCGC-02, Q.2.1, and also shown in the Envoy daily operations reports, include volumes of gas that have been sent to storage or taken from storage or have those amounts been subtracted from the daily cumulative customer imbalance figure?

Response 10.1:

Both of the calculation methods in effect during 2018-22 to determine the Cumulative Customer Imbalance (CCI) account for transfers into and out of storage be they nominated withdrawals, Cycle 6 trades between burn and storage accounts, or trades into or out of storage accounts during the monthly imbalance trading period.

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Question 10.2:

10.2. Referring to the following excerpt from an Envoy daily operating report:

Gas Flow date	Total Receipts	System Sendout	Net Injections/(Withdrawals)	Ending Storage Balance	Total Daily Customer Imbalance	Cumulative Customer Imbalance	Storage Wdr for Cust Balancing
04/01/2022	2320000	2285000	35000	73618000	18065	-565888	18065
04/02/2022	2324000	2119000	205000	73756000	163611	-400143	163611
04/03/2022	2273000	2107000	166000	73910000	75035	-276605	75035
04/04/2022	2332000	2170000	162000	74090000	56160	-111601	56160
04/05/2022	2283000	2150000	133000	74262000	27424	-75517	27424
04/06/2022	2305000	2212000	92000	74352000	720	-2478	720

10.2.1. Please explain how the total daily customer imbalance for 4/02/2022 (163611 Dth) relates arithmetically to the difference between the cumulative customer imbalance for 4/01/2022 and the cumulative customer imbalance for 4/02/2022 (165145 Dth).

Response 10.2.1:

For April 2022, the Total Daily Customer Imbalance and the Cumulative Customer Imbalance were independent calculations using separate variables. They are not directly reconcilable.

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0.2.2. Given that the net injections/withdrawal figure of 205,000 Dth for 4/02/2022 is equal to the difference between system receipts and system sendout, what makes up the difference between the net injections/withdrawal figure of 205,000 Dth and the daily customer imbalance of 163,611 Dth?

Response 10.2.2:

For April 2022, the **Total Daily Customer Imbalance** = (Total Injection + System Pack) – (Total Withdrawal + System Draft) – Net Scheduled Storage. It is not based on the simple difference between system receipts and system send-out.

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Question 10.3:

10.3. Has the core participated in imbalance trading?

Response 10.3:

Yes.

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Question 10.4:

10.4. If the answer to the previous question is “yes,” please indicate if the core has:

10.4.1. Participated in imbalance trading during more than 10 percent of the
imbalance trading periods.

Response 10.4.1:

Yes. For 2018-2022 core balancing agents have participated in more than 10
percent of the imbalance trading periods.

10.4.2. Participated in imbalance trading during more than 25 percent of the
imbalance trading periods.

Response 10.4.2:

Yes. For 2018-2022 core balancing agents have participated in more than 25 percent
of the imbalance trading periods.

10.4.3. Participated in imbalance trading during more than 50 percent of the
imbalance trading periods.

Response 10.4.3:

Yes. For 2018-2022 core balancing agents have participated in more than 50 percent
of the imbalance trading periods.