

UCAN's 11th Set of Data Requests
A. 06-08-010

(questions regarding SDG&E's 1/19/07 corrections to its amended application of 8/4/06)

1. For each of the following errors or corrections identified by SDG&E in its 1/19/filing, please describe both the approximate date and how SDG&E became aware of the error in its 8/4/06 filing:

- a. Use of an "incorrect Southern California gas price" in one of its 8/4/06 simulations.
- b. Use of "physically impossible heat rates for CA gas-fired boiler plants."
- c. Use of uncorrected "heat rates for certain newer combined cycle units."
- d. Use of oil as the "fuel source for certain CA gas-fired boiler plants."
- e. "inadvertently omit[ting] the Tijuana interconnection" in modeling "maximum import limits into the San Diego area."
- f. Incorrect "pricing in the dispatch of pumped storage" in GridView version 3.0.

2. Please provide the full set of natural gas prices (for all years and WECC subareas modeled in GridView) used in making the 1/19/07 corrections.

3. Please state whether the 1/19/07 natural gas price assumptions include local distribution company charges as well as interstate pipeline charges and gas commodity costs for gas-burning generators in:

- a. Southern California areas (San Diego area, LADWP area, IID area, and SCE area).
- b. Northern California areas (PG&E-Bay Area and PG&E-Valley)
- c. WECC subareas outside of California.

4. For all "newer combined cycle units" modeled in GridView for SDG&E's 1/19/07 corrections, please list:

- a. The full load heat rate used in SDG&E's 8/4/06 filing.
- b. The full load heat rate used in SDG&E's 1/19/07 corrections.

5. Please identify the "Maximum import limits into the San Diego Area" used in the 8/4/06 filing and the 1/19/07 corrections.

6. As set forth in Attachment A to the 1/19/07 filing, please provide the year-by-year costs (identified as to whether they are nominal dollars or \$2005 dollars or \$2006 dollars,

since all three kinds of dollars are shown at various points in Appendix A) which underlie each line of Tables IV-1 and VI-4.

7. In Attachment A to the 1/19/07 corrections, UCAN could not find any corrections for page VI-33 of the 8/4/06 filing. Please provide a corrected version of page VI-33, with corrections to the following four UCAN-identified errors plus any others SDG&E may identify:

a. The 8/4/06 filing asserts that "the in-generation alternatives are ... clearly less economic than the Sunrise Powerlink." It would appear that this statement is no longer true. Comparing corrected Tables IV-1 and VI-4, the in-basin combined cycle alternative is (according to SDG&E) \$61 million levelized dollars per year cheaper than Sunrise. If SDG&E agrees with UCAN's conclusion then please provide the corrected version of page VI-33. If you dispute this contention, please provide a detailed explanation of your counter position.

b. The 8/4/06 testimony asserts that the "combined cycle alternative ... achieve[s] a smaller level of energy benefits than Sunrise." UCAN believes that this statement is now false. Corrected table IV-2 shows energy benefits of \$190 million/year for Sunrise and corrected Table VI-4 shows energy benefits of \$303 million/year with combined cycles. \$303 million/year is not smaller than \$190 million/year. If SDG&E agrees with UCAN's conclusion then please provide the corrected version of page VI-33. If you dispute this contention, please provide a detailed explanation of your counter position

c. The 8/4/06 testimony says that the "combined cycle generation alternative generates just \$239 million [per year] in combined grid efficiency and RMR benefits." UCAN assumes this is false given that the corrected Table VI-4 shows the corrected number is \$303 million per year. If SDG&E agrees with UCAN's conclusion then please provide the corrected version of page VI-33. If you dispute this contention, please provide a detailed explanation of your counter position

d. The 8/4/06 testimony says "In contrast, the Sunrise Powerlink generates \$552 million [per year] in benefits." However, the revised Table IV-1 shows revises the \$552 million figure to just \$190 million. If SDG&E agrees with UCAN's conclusion then please provide the corrected version of page VI-33. If you dispute this contention, please provide a detailed explanation of your counter position

8. Please update Attachment B to include errata to p. VI-33.

9. With reference to footnote 16 on corrected page IV-17, please provide as detailed a description as is available of the differences between

a. The "Flexible Dispatch" option for pumped/storage generation facilities" in GridView version 3.0.

b. The “‘Flexible Dispatch’ option for pumped/storage generation facilities” in GridView version 3.4.

c. The “‘Price-Driven’ option for pumped/storage generation facilities” in GridView version 3.0.

d. The “‘Price-Driven’ option for pumped/storage generation facilities” in GridView version 3.4.

10. Assuming GridView accurately performs as described in response to UCAN data request 11-9, please explain in detail which of the GridView options for modeling pumped/storage generation would SDG&E consider as more representative of real world operations.

11. Without assuming that GridView accurately performs as described in response to UCAN data request 11-9, and in consideration of the results shown in SDG&E’s response to UCAN data request 8-1e, please provide the basis for whether SDG&E does or does not believe that GridView can be trusted to model pumped/storage generation as described in each of SDG&E’s responses to UCAN DR11-9a through 11-9d.

12. Footnote 16 to corrected page IV-17 shows the net CAISO consumer energy savings due to Sunrise (as compared to gas turbines – Case 101 minus Case 100) **decreasing** from \$71 million in 2010 to \$39 million in 2015 (in 2005 dollars). Please explain how SDG&E would propose use them to extrapolate net CAISO consumer energy savings for the years 2016 and beyond, assuming these values are correct.

13. Please provide versions of corrected Tables IV-1 and VI-2 as they would appear if SDG&E had used the sensitivity case results given in footnote 16 on revised page IV-17.

14. Please provide workpapers for the 1/19/07 corrections, including at a minimum, the same level of detail for Gridview outputs and the GridView post-processing spreadsheets included in SDG&E’s prior responses to UCAN DR8-1, and including the workpapers for the sensitivity study cited in new footnote 16 on corrected page IV-17.