

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
LOW OPERATIONAL FLOW ORDER &
EMERGENCY FLOW ORDER REQUIREMENTS
(A.14-06-021)**

(4th DATA REQUEST FROM THE INDICATED SHIPPERS)

QUESTION 1:

Paul Borkovich's testimony states at page 9, beginning at line 19:

PG&E does not impose noncompliance charges for the first day of an OFO event if notice is given after 6 PM the day prior to the start of the OFO event. While SoCalGas and SDG&E will strive to give as much advance notice as possible, noncompliance charges will not be waived so long as notice is provided at least 2 hours prior to the Intraday 1 Nomination Deadline for the day the low OFO goes into effect.

- a. What additional information, if any, does Sempra develop or receive between 6 PM on the day prior to the start of an OFO event and 2 hours prior to the Intraday 1 Nomination Deadline that will improve its OFO decision making process?
- b. Does Sempra contend that not waiving compliance charges if an event is called at least 2 hours prior to the Intraday 1 Nomination Deadline will reduce the number of events that would be called when compared with PG&E's approach?

RESPONSE 1:

- a. SoCalGas and SDG&E are able to develop better sendout forecasts and are able to gauge the morning ramp-up against forecasts.
- b. SoCalGas and SDG&E believe that is the likely effect (though additional information about deteriorating operational conditions could conceivably lead us to call an OFO that we would not have called if the deadline was earlier). But SoCalGas and SDG&E are unable to quantify the impact at this time.