

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**

**APPLICATION FOR AUTHORITY TO  
REVISE THEIR CURTAILMENT PROCEDURES**

**(A.15-06-020)**

**(3<sup>RD</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

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**QUESTION 3.1:**

- 3.1. With respect to David Bisi's direct testimony at pages 6-7, please provide the following information by the local service zones shown in Figure 3:
  - 3.1.1. What is the peak daily capacity of the backbone transmission system in each of the local zones shown in Figure 3?
  - 3.1.2. What is the peak daily capacity of the local transmission system in each of the local zones shown in Figure 3?
  - 3.1.3. For each of the local service zones, is the distribution system served only from the backbone and/or local transmission system within that local service zone or can the distribution system also be served from one or more backbone and/or local transmission pipes outside of the local service zone?
  - 3.1.4. If the answer to the previous question identifies any distribution system that can be served from backbone or local transmission pipelines at a location outside of the local service zone that the distribution system is designated to, please identify the local service zone in which the distribution system is located and identify by number the affected transmission pipelines.
  - 3.1.5. If there is an operational reason why gas cannot be delivered to a distribution system within a local service zone, would that cause a curtailment on the local transmission or backbone transmission systems within the local service zone?

**RESPONSE 3.1:**

- 3.1.1 Capacity of the local service zones is dependent on where demand is located on each system, and because of the highly interconnected nature of the SoCalGas and SDG&E transmission systems, variations in demand in one zone can potentially affect the capacity of another zone. Therefore, peak daily capacities for the transmission systems in each local service zone are unavailable.
- 3.1.2 See response 3.1.1.
- 3.1.3 Distribution systems may span local service zones, just as the transmission pipelines do themselves. However, all customers – whether served directly from the transmission system or served from the distribution system – are supplied by the transmission pipelines in their local service zone. Please refer to the Prepared Direct Testimony of David Bisi pages 6-7 on the relationship between local service zones.

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- 3.1.4 SoCalGas and SDG&E object to this question as it requests irrelevant information and is unreasonably burdensome. Without waiving these objections, and subject thereto, SoCalGas and SDG&E respond as follows:

Many transmission and distribution pipelines cross between the local service zone boundaries, see response 3.1.3.

- 3.1.5 Assuming the reason for distribution-level curtailment is contained to the distribution system, no.

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**QUESTION 3.2:**

- 3.2. With respect to the statement on page 6 of David Bisi's testimony: "These local service zones, shown in Figure 3 on page 8, reflect regions used in SoCalGas and SDG&E's operations and planning, and can all be considered "subsystems" of the larger transmission system."
  - 3.2.1. Is each of the ten local service zones operationally distinct?
  - 3.2.2. Are at least a portion of the local service zones operationally distinct from other local service zones?
  - 3.2.3. If the answer to the previous question is "yes," please identify each of the local service zones that are operationally distinct from other zones and indicate which zones they are operationally distinct from.

**RESPONSE 3.2:**

- 3.2.1 Assuming "operationally distinct" means that each local service zone can be operated independently of one another, no. SoCalGas and SDG&E use zones when referring to specific locations within a large service territory, and each zone boundary is drawn with consideration for the transmission pipelines distribution systems that customers are receiving physical supplies from. This does not mean that each zone is completely independent from every other zone, and each zone is not dependent on every other zone. Each zone can be impacted by supplies, maintenance, outages, and emergencies in other zones, particularly adjacent zones. As stated in the Prepared Direct Testimony of David Bisi pages 6-7, customers will only be curtailed if the local service zone they are located in is subject to a curtailment, and multiple zones may be affected at the same time.
- 3.2.2 Using the same definition for "operationally distinct" as Response 3.2.1, no. Each zone is tied to another zone, but not necessarily tied to every other zone. Refer to response 3.2.1.
- 3.2.3 N/A