

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

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

(A.15-06-020)

(18TH DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

QUESTION 18.1:

18.1. The Applicants state (at 2): “As of September 1, 2016, the core usage forecasts provided by the Demand Forecasting Group to the Utility Gas Procurement Department (i.e., Gas Acquisition) have been modified so that they are calendar day (midnight to midnight) forecasts, rather than gas day (7 AM to 7 AM) forecasts.”

18.1.1. Does this mean that the Gas Acquisition was required to balance its supplies obtained during the 24 hour Gas Day that started September 1, 2016 at 7:00 am with the core usage during the September 1, 2016 midnight to midnight calendar day (“Measurement Day”)?

18.1.2. Has this procedure been followed consistently for each Gas Day and Measurement Day since the September 1, 2016 Gas Day and Measurement Day?

RESPONSE 18.1:

18.1.1: Yes, the core forecasts from the Demand Forecasting Group are now calendar day forecasts.

18.1.2: The reference to both Gas Day and Measurement Day in this question is confusing. Since September 1, 2016, the core demand forecasts that the Demand Forecasting Group provides to the Utility Gas Procurement Department each morning have been calendar day forecasts.

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QUESTION 18.2:

The Applicants state (at 2): “We believe that this change should improve the accuracy of such forecasts.” Please quantify the extent to which the change has improved the accuracy of the Demand Forecasting Group forecast for the Measurement Days starting with September 1, 2016.

RESPONSE 18.2:

SoCalGas/SDG&E have not attempted to quantify the extent to which this change has improved the forecast. Any such quantification, to the extent the effect of this change could be isolated from other factors, would likely require a comparison of data developed over a range of seasons, weather conditions, and operating conditions.

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QUESTION 18.3:

- 18.3. The Applicants state (at 2-3): “And beginning December 1, 2016, the Demand Forecasting Group will begin incorporating historical data from SDG&E’s Advanced Metering Infrastructure (AMI) systems into the daily core forecast.”
- 18.3.1 Please explain how using “historical data from SDG&E’s AMI systems” would be used to improve the Applicants’ forecast of SDG&E core load for a given calendar day.
- 18.3.2 Would using historical data from SDG&E’s AMI system improve the forecast of SoCalGas core load in addition to SDG&E core load?
- 18.3.2.1 If so, how?

RESPONSE 18.3:

- 18.3.1: Historical data from SDG&E’s AMI systems would reflect actual historical daily usage of SDG&E’ core customers, as opposed to the existing method which estimates daily usage of SDG&E’s core customers. We believe that incorporating this actual historical data into the forecasting model should improve the forecast over time.
- 18.3.2: No.
- 18.3.2.1: Not applicable.

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QUESTION 18.4:

The Applicants state (at 3, footnote 7): “The Demand Forecasting Group needs until December 1, 2016 to properly vet” the historical data from SDG&E’s AMI system. Please explain how the Applicants would “vet” the data?

RESPONSE 18.4:

We would vet the data by analyzing the SDG&E’s historical daily AMI data for potential errors/inconsistencies, and comparing it with monthly billing data and/or current estimated daily data.

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QUESTION 18.5:

- 18.5. The Applicants state (at 3, footnote 7): “SoCalGas is not as far along as SDG&E with its AMI build out, and we would need a substantial history of post-build out SoCalGas AMI data to review before incorporating it into the daily core demand forecast.”
- 18.5.1. How long would the Applicants need before using the “substantial history of post-build out SoCalGas AMI data” could be used in preparing the Applicants’ daily core demand forecasts?
- 18.5.2. Could the Applicants use AMI data from portions of their service area to inform their forecasting efforts and improve their forecasts?
- 18.5.3. If the answer to the previous question is “no,” please explain why the Applicants would only be able to use AMI data to improve their forecasting efforts after they have AMI data for their entire system.

RESPONSE 18.5:

- 18.5.1: At a minimum, SoCalGas would need one year of historical daily AMI data after the SoCalGas AMI build-out is complete. However, at least two years of historical data would be preferable.
- 18.5.2: Although it might be possible, it is not clear that this would lead to improved forecasts. The portion of SoCalGas’ service area from which AMI data is available is continually changing as more AMI devices are installed. The AMI installations are performed on geographic area basis, not on a random basis, within SoCalGas’ service area. Therefore, scaling up of AMI usage data to represent 100% of SoCalGas’ service area is likely to lead to an inappropriate approximation of SoCalGas’ total daily core load. In addition, please see Response 18.5.1 for the amount of historical AMI data that would be needed before such data could reasonably be incorporated into our core demand forecasts.
- 18.5.3: N/A

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QUESTION 18.6:

- 18.6. The Applicants propose (at 3): “To help increase the accuracy of the daily core forecast, SoCalGas and SDG&E propose that the Demand Forecasting Group continue to provide Utility Gas Procurement with an initial daily demand forecast based on the most current weather forecast available as of 5:00 AM that day, and also provide an updated forecast based on the most current weather forecast available as of 7:00 AM that day, and the Utility Gas Procurement be required to balance to the later forecast.”
- 18.6.1. Do the Applicants intend that the Demand Forecasting Group provide to the Gas Acquisition at 7:00 AM on a flow day will be available to be used by Gas Acquisition in making its Intraday 1 Cycle nomination that is due by 8:00 AM on the flow day?
- 18.6.2. Please quantify the extent to which the Applicants expect the 7:00 am forecast will improve in comparison to the 5:00 am forecast.

RESPONSE 18.6:

18.6.1: Yes.

18.6.2: SoCalGas/SDG&E have not attempted to quantify the improvement in the forecasts from moving from a 5:00 am to a 7:00 am forecast. Any such quantification, to the extent the effect of this change could be isolated from other factors, would likely require a comparison of data developed over a range of seasons, weather conditions, and operating conditions.

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QUESTION 18.7:

- 18.7. The Applicants state (at 4, footnote 11): “If core customers were required to balance to a forecast updated any later in the gas day, Utility Gas Procurement would be forced (by elapsed pro rata rules that allow interruptible storage injections and withdrawals to take precedence over later firm nominations in late cycles) to nominate significantly more storage injections and/or withdrawals in early cycle each day, which in turn would likely lead to unused storage capacity and paradoxically less, rather than more, system reliability. In fact, requiring core customers to balance to a forecast later than 7:15 AM could potentially lead to OFOs on almost every day.”
- 18.7.1. Please identify any and all provisions in the SoCalGas tariff that restrict holders of firm storage injection and withdrawal rights from bumping interruptible injections and withdrawals.
- 18.7.2. Please explain how NAESB elapsed pro rata rules would prevent bumping of interruptible storage injections and withdrawals by holders of firm storage injection and withdrawal rights in the Evening, Intraday 1, Intraday 2, or Intraday 3 cycles.
- 18.7.3. SoCalGas Rule 30 provides: “Intraday 4 nominations are available only for firm nominations relating to the injection of existing flowing supplies into a storage account or for firm nominations relating to the withdrawal of gas in storage to meet an identified customer’s usage.” Given that provision, please explain how NAESB elapsed pro rata rules would prevent bumping of interruptible storage injections and withdrawals by holders of firm storage injection and withdrawal rights in the Intraday 4 Cycle.

RESPONSE 18.7:

- 18.7.1 SoCalGas Rule 30 section D.4.
- 18.7.2 For each gas day, the NAESB elapsed pro rata rules can impact the scheduling of firm gas starting on the Intraday 1 cycle and continue through the Intraday 3 cycle. For example, if interruptible injections or withdrawals were scheduled for the Evening cycle, new firm nominations can only bump the interruptible nominations up to the to the elapsed pro rata value which is approximately 21% of what was scheduled on the Evening cycle. The chart below shows the approximate elapsed pro rata percentages for each scenario based on which cycle interruptible was first scheduled and which cycle new firm was nominated:

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Approximate Elapsed Pro Rata Percentages

		IT Scheduled in Evening Cycle	IT Scheduled in ID1 Cycle	IT Scheduled in ID 2 Cycle
New Firm Nomination	ID1 Cycle	21%		
	ID2 Cycle	38%	21%	
	ID3 Cycle	55%	42%	27%

18.7.3 The Intraday 4 cycle is only available for firm injections and withdrawals. Storage nominations in the Intraday 4 cycle cannot bump previously scheduled interruptible quantities.

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QUESTION 18.8:

Please provide the currently projected date on which the Aliso Canyon Turbine Replacement Project (“ACTR”) will become operational and placed in service.

RESPONSE 18.8:

The new compressors installed in the ACTR project are expected to be operational and placed into service by December 2016.