

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
NORTH-SOUTH PROJECT REVENUE REQUIREMENT
(A.13-12-013)**

(24th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

QUESTION 24.1:

24.1 SoCalGas posted a critical notice on Envoy on July 1, 2015 (10:30 AM) announcing the following:

Emergency localized curtailment for SoCalGas Los Angeles Basin are for Wednesday, July 1, 2015 effective 3:00 PM PCT. We expect this event to end at 9:00 PM PCT.

SoCalGas has called an emergency localized curtailment for the SoCalGas Los Angeles Basin service area, affecting certain electric generation customers in this area. These customers will be contacted directly by their Account Executives/Managers with specific curtailment instructions. This curtailment is in effect until further notice. All noncore customers in the SoCalGas Los Angeles Basin service area remain on curtailment watch.

By notice posted on Envoy on July 1, 2015 (7:22 PM) SoCalGas announced: "The emergency localized curtailment in the Los Angeles basin area on the SoCalGas system will end at 8:00 PM (2000 Hours) on Wednesday, July 1, 2015." This Data Request 24 addresses the curtailment that was noticed on Envoy on July 1, 2015, and refers to the curtailment as "July 1, 2015 Curtailment."

24.1.1 Please identify the specific tariff provision pursuant to which SoCalGas called the July 1, 2015 Curtailment

24.1.2 Please identify the Local Service Zones identified in Attachment A of the Prepared Direct Testimony of David M. Bisi in A.15-06-020 that were affected by the July 1, 2015 Curtailment.

24.1.3 Please identify the electrical generation facilities that were curtailed.

RESPONSE 24.1:

24.1.1 SoCalGas Rule No. 23, sections E and F.

24.1.2 The North and South LA Basin Local Service Zones were impacted.

24.1.3 SoCalGas objects on the grounds that it requests confidential customer information.

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QUESTION 24.2:

24.2 A posting on Envoy under “Operations – Maintenance Schedules” shows that a Capacity Reduction of 540 MMcf began in the “Needles/Topock Area Zone” on June 3, 2015 and was in effect at the time of the July 1, 2015 Curtailment. The Capacity Reduction is described on Envoy as follows: “Planned – Line 4000 pipeline remediation between Newberry Compressor Section and Cajon.”

24.2.1 Please identify the normal capacity of the Line 4000 at the locations affected by the capacity reduction and identify the diameter of the pipeline at those locations.

24.2.2 Please explain the reason for the capacity reduction.

24.2.3 Please explain in detail whether and, if so, how the posted 540 MMcf capacity reduction contributed to the July 1, 2015 Curtailment.

RESPONSE 24.2:

24.2.1 SoCalGas objects to this question as it seeks information that SoCalGas deems sensitive and confidential for public safety and security reasons.

24.2.2 Line 4000 was removed from service for class location remediation.

24.2.3 The capacity reduction resulted in less interstate pipeline supplies available on the SoCalGas system.

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QUESTION 24.3:

A posting on Envoy under “Operations – Maintenance Schedules” shows a capacity reduction of 150 MMcf at “KR/MO-Kramer Junction” starting on June 14, 2015, and was in effect at the time of the July 1, 2015 Curtailment. The Capacity Reduction is described on Envoy as follows:

“Planned – Line 235 decrease of maximum operating pressure between Newberry Compressor Station and Quigley Reduction required due to ongoing pipeline outages.”

24.3.1 Please identify the normal capacity of the Line 235 at the locations affected by the capacity reduction and identify the diameter of the pipeline at those locations.

24.3.2 Please explain the reason for the capacity reduction.

24.3.3 Please explain in detail whether and, if so, how the posted 150 MMcf capacity reduction contributed to the July 1, 2015 Curtailment.

RESPONSE 24.3:

24.3.1 Please refer to response 24.2.1 of this data request.

24.3.2 The reduction in receipt capacity at Kramer Junction was necessary to transport supplies on Line 235 from the Needles/Topock Area Zone.

24.3.3 Please refer to Response 24.2.3 of this data request.

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QUESTION 24.4:

A posting on Envoy under “Operations –Maintenance Schedules” shows that a Capacity Reduction of 200 MMcf began in the “Needles/Topock Area Zone” on June 12, 2015 and was in effect at the time of the July 1, 2015 Curtailment. The Capacity Reduction is described on Envoy as follows: “Planned – Line 235 decrease of maximum operating pressure between Newberry Compressor Station and Quigley.”

- 24.4.1 Please identify the normal capacity of Line 235 at the locations affected by the capacity reduction and identify the diameter of the pipeline at those locations.
- 24.4.2 Please explain the reason for the capacity reduction.
- 24.4.3 Please explain in detail whether, and, if so, how the posted 200 MMcf capacity reduction contributed to the July 1, 2015 Curtailment.

RESPONSE 24.4:

- 24.4.1 Please refer to response 24.2.1 of this data request.
- 24.4.2 Please refer to Response 24.2.2 of this data request.
- 24.4.3 Please refer to Response 24.2.3 of this data request.

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QUESTION 24.5:

A Critical Notice posted on Envoy posted on July 15, 2015 (9:47 AM) stated:

In order to address potential constraints this summer, SoCalGas will conduct the required compliance work on Line 4000 in two phases. Phase I of this work is currently anticipated to be completed by August 21, 2015. Phase II will be postponed until the fourth quarter of 2015, at which time Line 4000 will once again be temporarily taken out of service to complete the remaining remediation work.

Once Phase I of the Line 4000 work is completed, SoCalGas will remove the following existing capacity reductions: 1) the 150 MMCFD capacity reduction at KR/MO – Kramer Junction, 2) the 200 MMCFD capacity reduction in the Needles/Topock Area Zone and 3) the 540 MMCFD capacity reduction in the Needles/Topock Area Zone. However, Once Phase II of the Line 4000 work begins later this year, each of these capacity reductions will be reinstated.

In addition, to enable other required remediation to be completed between the Phase I and Phase II work on Line 4000, SoCalGas will institute a 500 MMCFD capacity reduction to the Needles/Topock Area Zone at the conclusion of Line 4000 Phase I work.

Details on start and end dates for Phase II will be posted on the maintenance schedule as soon as they are available.

This Critical Notice implies that the 150 MMcf/d capacity reduction at “KR/MO – Kramer Junction,” the 200 MMcf/d capacity reduction in the “Needles/Topock Area Zone,” and the 540 MMcf/d work in the Needles Topock Zone Area are somehow associated so as to be called, together, “compliance work on Line 4000.”

24.5.1 Please explain in detail how the three capacity reductions are related so as to be called, together, “compliance work on Line 4000.”

24.5.2 Please identify the agency or program that requires the “compliance work on Line 4000” and identify the documents that require the work.

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- 24.5.3 Please explain the nature of the “compliance work.”
- 24.5.4 Please explain the location of the 500 MMcf/d capacity reduction that will occur between the Phase I and Phase II work “to enable other required remediation,” identify the pipeline involved by number, identify the capacity and diameter of the pipeline, and explain the nature of the “other required remediation.”
- 24.5.5 Please explain the agency or program that requires “other required remediation” that the Critical Notice indicates will be “completed between the Phase I and Phase II work” and identify the documents that require the work.

RESPONSE 24.5:

- 24.5.1 The three capacity reductions cited are all resulting from the loss of Line 4000. When Line 4000 is restored to service, these losses no longer apply.
- 24.5.2 49 CFR §192.611.
- 24.5.3 SoCalGas plans to hydrotest or replace portions of Line 4000 as necessary for class location changes.
- 24.5.4 SoCalGas objects to this question in regards to the pipeline diameters and capacities as it seeks information that SoCalGas deems sensitive and confidential for public safety and security reasons. Without waiving these objections, SoCalGas responds as follows: The 500 MMcfd capacity reduction that will occur when L4000 is restored to service and Line 235 is removed from service is at the Needles/Topock Area Zone. This reduction is a result of the class location remediation work required on Line 235, in which SoCalGas will hydrotest or replace sections of that pipeline between Newberry and Adelanto.
- 24.5.5 Please refer to response 24.5.2 of this data request.

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QUESTION 24.6:

Please explain whether there were any cuts in any nominations to any of the power plants were subject to the July 1, 2015 Curtailment.

RESPONSE 24.6:

SoCalGas does not impose any nomination cuts. SoCalGas issues a curtailment order, and customers or shippers adjust their nominations accordingly.

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QUESTION 24.7:

If nominations of gas for delivery to the power plants that were affected by the July 1, 2015 Curtailment were not reduced, please explain why the nominated and confirmed volumes could not be delivered to the power plants in spite of the 540 MMcf, 200 MMcf, and 150 MMcf capacity reductions that were apparently associated with “required compliance work” on Line 4000.

RESPONSE 24.7:

Please refer to Response 24.6 of this data request.

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QUESTION 24.8:

If nominations of gas for delivery to the powerplants that were affected by the July 1, 2015 Curtailment were reduced, were these reductions in nominations made pro rata to all customers with similar levels of service under the BTS tariff?

RESPONSE 24.8:

Please refer to Response 24.6 of this data request.

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QUESTION 24.9:

According to Envoy, SoCalGas estimated that it had 2888 MD of withdrawal capacity available at its storage field for July 1, 2015. Please explain why withdrawals corresponding to the volume of gas that was delivered into the SoCalGas system for redelivery to the power plants that were curtailed could not have been made from the storage fields, particularly, Playa del Rey, Aliso Canyon, and Honor Rancho, so that the curtailments could have been avoided.

RESPONSE 24.9:

Based upon the projected electric generation demand provided to SoCalGas by the CAISO for June 30 and July 1, 2015, SoCalGas' withdrawal capacity would have been insufficient to meet the projected system sendout with the losses in receipt capacity associated with Lines 4000 and 235.

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QUESTION 24.10:

Please provide the firm capacity that would have been available for deliveries from the SoCalGas Northern Zone in the absence of the 150 MMcf, 200 MMcf, and 540 MMcf capacity reductions.

RESPONSE 24.10:

SoCalGas' Northern Zone has the capacity to receive and transport 1590 MMcfd of interstate pipeline supply assuming all assets are in service and operational.

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QUESTION 24.11:

Identify the firm capacity that was actually available from the Northern Zone on July 1, 2015, given the 150 MMcf, 200 MMcf, and 540 MMcf capacity reductions.

RESPONSE 24.11:

The receipt capacity of the Northern Zone on June 30 and July 1, 2015 was 1000 MMcfd with these reductions.

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QUESTION 24.12:

SoCalGas has posted on Envoy under “Operations – Maintenance Schedules” a capacity reduction of 750 MMcf withdrawal capacity at Aliso Canyon that is in effect from May 18, 2015 to October 16, 2015:

- 24.12.1 Please explain in detail whether, and, if so, how, the 750 MMcf capacity reduction in withdrawal capacity at Aliso Canyon contributed to the July 1, 2015 Curtailment.
- 24.12.2 This 750 MMcf reduction in withdrawal capacity at Aliso Canyon is described on Envoy as “Planned Dehy #2 upgrade project.” Please explain what this description means.
- 24.12.3 Please explain whether the 750 MMcf reduction in withdrawal capacity at Aliso Canyon was taken into account in estimating total withdrawal capacity of 2888 MDTH for July 1, 2015.
- 24.12.4 Please identify the total withdrawal capacity that was available at Aliso Canyon, given the 750 MMcf reduction in withdrawal capacity.

RESPONSE 24.12:

- 24.12.1 The loss in withdrawal capacity at Aliso did not directly contribute to the curtailment event, however the limitation was seen as a system constraint at a time where the system was being stressed. If the demand on the system had transpired as forecasted, then the full withdrawal capacity from Aliso would have been needed to maintain system integrity, and the reduction would have contributed further to the curtailments.

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- 24.12.2 SoCalGas performs maintenance on its withdrawal facilities during the summer operating season, so that they are fully available during the winter heating season. Aliso Canyon's dehydration unit #2 is undergoing such maintenance.
- 24.12.3 Yes.
- 24.12.4 1110 MMcfd of withdrawal capacity was available at Aliso Canyon with the planned dehy maintenance.

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QUESTION 24.13:

The July 15, 2015 (9:47 am) Critical Notice says that “Phase I” of the “required compliance work on Line 4000” is currently anticipated to be completed by August 21, 2015.

- 24.13.1 Please project the degree of likelihood that there will be another curtailment of service to the power-plants affected by the July 1, 2015 curtailment during Phase I.
- 24.13.2 Please project the likelihood that there will be another curtailment of service to the same power plants during Phase II.
- 24.13.3 Please project the likelihood that there will be another curtailment of service to the same power plants during the period between Phase I and Phase II.

RESPONSE 24.13:

- 24.13.1 SoCalGas cannot project such likelihood.
- 24.13.2 Please refer to response 24.13.1 of this data request.
- 24.13.3 Please refer to response 24.13.1 of this data request.