

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

QUESTION 6-1:

On page 3, lines 15-16, of Ms. Dandridge's testimony, SoCalGas states that the total working inventory capacity at the Aliso Canyon gas storage facility will be 68.6 Bcf due to compliance with new DOGGR storage regulations. However, because of the Aliso Canyon incident in 2015, the CPUC instructed SoCalGas to maintain a lower working inventory of Bcf at Aliso Canyon.

- a. Please state what the *actual* total working inventory capacity that is currently available to SoCalGas, assuming existing field conditions and regulatory protocols, and will continue to maintain for the foreseeable future, at Aliso Canyon for each year of the 2020-2022 TCAP period.
- b. Please provide any supporting information and documentation that demonstrates how the response was determined, calculated and/or analyzed.
- c. Please provide the difference between the total working inventory Bcf capacity as provided by Ms. Dandridge in her testimony and the actual total working inventory Bcf capacity discussed in response to this question.
- d. Please provide a narrative on how the actual total working inventory Bcf capacity at Aliso Canyon would change associated testimony, calculations and cost forecasts as provided in this 2020-2022 TCAP proceeding.

RESPONSE 6-1:

- a. Applicants object to this question as vague and ambiguous with regards to the term "actual total working inventory capacity," and "will continue to maintain for the foreseeable future." Subject to and without waiving this objection, Applicants respond as follows: Please see response to SCGC Data Request, Set 6, Question 6.6.2 for Applicants' definition of working gas, which Applicants assume to be analogous to working inventory. Aliso Canyon is under various current restrictions which are described in Chapter 1 (Dandridge) pp. 3-4. While Aliso Canyon is available for injection up to a maximum inventory of 34 Bcf, withdrawal is restricted per the Aliso Canyon Withdrawal Protocol, so working gas is effectively 0 Bcf.
- b. Please see response 6-1a.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING
(A.18-07-024)**

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

- c. Please see response 6-1a.
- d. The call of the question is contrary to Applicants' comprehensive proposal, which makes several key assumptions. Therefore, Applicants have not performed this analysis.

Notwithstanding, if working inventory at Aliso Canyon was proposed at 0 Bcf instead of 68.6 Bcf, one would expect that total storage inventory, injection, and withdrawal capacities would be reduced accordingly. Applicants cannot speculate on how that scenario would impact all the calculations, studies, and models performed.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

QUESTION 6-2:

- a. Taking into consideration any constraints or moratoriums set by the CPUC, please state what the actual total summer and winter injection capacities that are currently available to SoCalGas, assuming existing field conditions and regulatory protocols, and will be available for the foreseeable future, at the Aliso Canyon gas storage facility for each year of the 2020-2022 TCAP period.
- b. Please provide any supporting information and documentation that demonstrates how the response was determined, calculated and/or analyzed.
- c. What are SoCalGas's assumptions in its testimony regarding the total summer and winter injection capacities at Aliso Canyon over the 2020-2022 TCAP period? Please state those assumptions and provide the factual basis for those assumptions.
- d. Please provide the difference between those factual assumptions that determined the summer and winter injection capacities and the actual summer and winter injection capacities as discussed in response to this question.
- e. Please provide a narrative on how the actual summer and winter injection capacities at Aliso Canyon would change associated testimony, calculations and cost forecasts as provided in this 2020-2022 TCAP proceeding.

RESPONSE 6-2:

- a. There are currently no restrictions on SoCalGas's ability to inject gas at Aliso Canyon. The nominal injection capacity at Aliso Canyon is 545 MMcfd. The actual total summer and winter injection capacities can be found in ENVOY. Applicants have used an assumption of unrestricted injection capacity in its proposal for the 2020-2022 TCAP period.
- b. Please refer to part a.
- c. Please see Chapter 1 (Dandridge) p. 3, "Applicants' comprehensive storage proposal are based on the unrestricted injection and withdrawal utilization of the Aliso Canyon storage facility, at these adjusted operational levels."
Applicants use currently known operating parameters as certified by DOGGR that the Commission concurred with.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

d. There would be no difference. Please refer to part a and c.

e. Please see response 1d.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

QUESTION 6-3:

- a. Taking into consideration any constraints or moratoriums set by the CPUC, please state what the actual total summer and winter withdrawal capacities that are currently available to SoCalGas, assuming existing field conditions and regulatory protocols, and will be available for the foreseeable future, at the Aliso Canyon gas storage facility for each year of the 2020-2022 TCAP period.
- b. Please provide any supporting information and documentation that demonstrates how the response was determined, calculated and/or analyzed.
- c. What are SoCalGas's assumptions in its testimony regarding the total summer and winter withdrawal capacities at Aliso Canyon over the 2020-2022 TCAP period? Please state those assumptions and provide the factual basis for those assumptions.
- d. Please provide the difference between those factual assumptions that determined the summer and winter withdrawal capacities and the actual summer and winter withdrawal capacities as discussed in response to this question.
- e. Please provide a narrative on how the actual summer and winter withdrawal capacities at Aliso Canyon would change associated testimony, calculations and cost forecasts as provided in this 2020-2022 TCAP proceeding.

RESPONSE 6-3:

- a. Zero withdrawal due to Aliso Canyon Withdrawal Protocol.
For the 2020-2022 TCAP period, Applicants have not performed a study to determine firm withdrawal capacity without Aliso Canyon.
- b. Please see " Aliso Canyon Withdrawal Protocol."
http://cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/CPUC%20Letter%20to%20SoCalGas%20re%20Aliso%20Canyon%20Withdrawal%20Protocol.pdf
- c. Please see Chapter 1 (Dandridge) p. 3, "Applicants' comprehensive storage proposal are based on the unrestricted injection and withdrawal utilization of the Aliso Canyon storage facility, at these adjusted operational levels."
Applicants use currently known operating parameters as certified by DOGGR that the Commission concurred with.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR
NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS EFFECTIVE
JANUARY 1, 2020 IN THE TRIENNIAL COST ALLOCATION PROCEEDING**

(A.18-07-024)

(6th DATA REQUEST FROM THE INDICATED SHIPPERS)

DATA RECEIVED: 3-19-19

DATE RESPONDED: 4-2-19

-
- d. Applicants have not performed a study to determine firm withdrawal capacity without Aliso Canyon. In addition, please see response a.
 - e. Please see response 1d.