

**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)

(10th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

DATA RECEIVED: 3-18-19

DATE RESPONDED: 4-1-19

QUESTION 10.1:

With respect to the statement at pages 3-4 of the Direct Testimony of Michelle Dandridge: Applicants are proposing that the total inventory available for allocation for the upcoming TCAP period 2020 - 2022 will be 119.5 Bcf, which accounts for a lower working inventory available at Aliso Canyon. Currently, Aliso Canyon is approved by DOGGR to operate at a maximum field pressure of 2,926 pounds per square inch absolute (psia), which corresponds to a total working inventory capacity of approximately 68.6 Bcf, a figure DOGGR provided to the Commission. Applicants' comprehensive storage proposals are based on unrestricted injection and withdrawal utilization of the Aliso Canyon storage facility, at these adjusted operational levels.

Instead of these stated assumptions, please assume that the inventory at Aliso Canyon storage field is maintained at the 34 Bcf stated in the July 6, 2018 Update to the Section 715 Report throughout the TCAP period and that the Aliso Canyon Withdrawal Protocol continues in effect and respond to each of the questions below based on these assumptions.

- 10.1.1. Please identify the amount of storage inventory capacity, storage injection capacity for both winter and summer and storage withdrawal capacity for both winter and summer that would be expected to exist in total at SoCalGas' storage fields.
- 10.1.2. Please allocate the storage capacity associated with each function to the various storage services, *i.e.*, core reliability, load balancing, *etc.*
- 10.1.3. Please show an allocation of the proposed \$161.6 million that witness Fung has identified as the storage cost of service to the various services identified in response to Q.10.1.2, presenting the results in a revised version of Table 23 from witness Fung's testimony. Please provide a copy of the model from witness Fung's workpapers that is used to derive the revised Table 23 as a complete working Excel model with all data, formulas, and links intact.
- 10.1.4. Please provide a revised allocation based on the results of the revised version of Table 23 that is provided in response to Q.10.1.3, presenting the results in the form of a revised version of Tables 4 and 5 from witness Schmidt-Pines's testimony. Please provide a copy of the revised cost allocation workbooks, "2020 TCAP SCG RD Model.xlsx" and "2020TCAP SDGE RD Model.xlsx," (and any other required revised models) that are used to develop the revised Tables 4 and 5 as complete working Excel models with all data, formulas, and links intact.

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10.1.5. Please state any assumption that SoCalGas makes in order to complete these allocations that are (1) in addition to the assumptions stated in the questions or stated in the response to the questions or (2) different from the assumptions already included in the copy of each of the cost allocation workbooks “2020 TCAP SCG RD Model.xlsx” and “2020TCAP SDGE RD Model.xlsx” in the existing workpapers for the application.

RESPONSE 10.1:

Applicants have presented a comprehensive TCAP proposal based on their underlying assumptions. Applicants have not prepared alternatives to its comprehensive proposal, and have not run their various cost studies using alternate storage-related assumptions.

In addition, please see Cal PA DR#27 Response to Q2b & 2c.