APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY & SAN DIEGO GAS & ELECTRIC COMPANY FOR AUTHORITY TO REVISE THEIR NATURAL GAS RATES AND IMPLEMENT STORAGE PROPOSALS IN THE 2024 COST ALLOCATION PROCEEDING

(A.22-09-015)

(DATA REQUEST SET 14 FROM SOUTHERN CALIFORNIA GENERATION COALITION DATED MAY 22, 2023)

SOCALGAS RESPONSE DATED: JUNE 5, 2023

Questions regarding Chapter 11:

- 14.1. Regarding the statement at page 15: "Parties who provide incremental cost-based funding under Rule 39 for displacement and/or expansion receipt point capacity prior to the first open season following completion of the facilities and each open season thereafter."
 - 14.1.1. Please identify each of the circumstances where a party or parties provided funding under Rule 39 for displacement and/or expansion receipt point capacity.

RESPONSE 14.1.1.

Shell Energy North America and Sempra LNG co-funded the Otay Mesa Receipt Point Project for 400 MMcfd in displacement capacity in 2007.

Below is a table of displacement capacity producer interconnect projects funded under Rule 39.

First Flow Date	Contract capacity Mcf/d
10/8/2013	4,080
9/23/2015	3,708
4/23/2018	2,000
6/20/2018	14,000
8/31/2018	5,000
2/22/2019	6,240
8/26/2020	3,552
10/14/2020	3,552
5/18/2021	2,262
9/25/2020	2,880

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5/12/2021	1,704
4/21/2021	1,512
4/28/2021	3,024
1/27/2022	1,485
2/7/2012	900
1/7/2021	720

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14.1.2. Please provide the date associated with each of the circumstances described in response to the previous question.

RESPONSE 14.1.2.

See Response 14.1.1

14.1.3. Please identify the parties that provided in the funding under Rule 39 for displacement and/or expansion receipt capacity.

RESPONSE 14.1.3.

Applicants object on the grounds that the request seeks information that is not relevant to this proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. Applicants further object that the request seeks private information of third parties for which Applicants are not permitted to disclose. Subject to and without waiving the foregoing, the identity of Rule 39 interconnect operators has only been disclosed for the Otay Mesa Receipt Point Project. The identity of the producer projects is not disclosed to the public without the consent of the operator.