

**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 TURN-SEU-2)  
DATA RECEIVED: March 31, 2023  
DATE RESPONDED: April 14, 2023**

**Question 1:**

- 1) Please provide the 2022 Form 2s for SoCalGas and SDG&E as soon as they become available.

**Response 1:**

The 2022 Form 2s for SoCalGas and SDG&E will be provided when they become available.

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**Question 2:**

- 2) Please provide the authorized gas base margin for both SoCalGas and SDG&E as of the date of implementation of the last General Rate Case decision, and list all changes to the authorized gas margin since then and the date of the change, including a reference to the CPUC decision or advice letter that authorized the change, up to the present. Also please indicate whether each change was for a specific cost item or a generalized increase in base margin.

**Response 2:**

See excel file, TURN 2-Q2.



TURN%202-%20Q2.xl

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**Question 3:**

- 3) Please detail any and all adjustments to the authorized base margin that were used to derive the \$2,998,156 figure shown as the total “Allocated Base Margin” in Table 12 of witness Schmidt-Pines’ testimony. Also please explain the approximately \$2.5 million difference in the total “Allocation of Base Margin” between the “Current” and “Proposed” columns in Table 13.

**Response 3:**

See excel file, TURN 2 -Q3. The approximately \$2.5 million difference in the total “Allocation of Base Margin” between the “Current” and “Proposed” columns in Table 13 in the SoCalGas/SDG&E Testimony of Marjorie Schmidt-Pines is due to the updated Core Brokerage fee.



TURN 2 - Q3.xlsx

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**Question 4:**

- 4) Please detail all adjustments to the authorized base margin that were used to derive the \$450,156 figure shown as the total “Allocated Base Margin” in Table 14 of witness Foster’s testimony.

**Response 4:**

See excel file, TURN 2 -Q4.



TURN 2 -Q4.xlsx

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**Question 5:**

- 5) Please detail, by account, the non-base margin costs that were excluded from the FERC Form 2 data to obtain the figures shown in Appendix A of witness Seres' testimony. Is there any other reason why the figures in Appendix A differ from those shown for the same accounts in the Form 2? If so, please explain and quantify each of those differences.

**Response 5:**

Please see excel file, TURN 2-Q5. In addition, see excel file, TURN 2-Q6, in response to Question 6 for PSEP exclusions.



TURN 2-Q5.xlsx

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**Question 6:**

- 6) Re: Seres Testimony, page 2, lines 13-17: Please provided the amounts, by account, of PSEP costs that were excluded from the embedded cost studies. Also, please explain how the removed PSEP costs are “reallocated functionally,” with a specific example.

**Response 6:**

See attached excel file, TURN 2- Q6 for PSEP exclusions.

Per the direct testimony of Frank Seres, “PSEP costs are either allocated directly to customer classes through balancing account amortization or are removed from General Rate Case (GRC) base margin and reallocated functionally”. For example, PSEP related dollars authorized in the GRC are excluded from the embedded cost study. For ratemaking purposes, those dollars are excluded from base margin and are allocated directly to backbone transmission service.



TURN 2- Q6.xlsx

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**Question 7:**

- 7) Re: Seres Testimony, page 15, lines 10-12: Please specify the exact number of larger customers who are served directly off the backbone transmission system without using local transmission lines. Are all of these customers electric generators, or are some part of other customer classes? Would the total cost of the backbone transmission system be any different if these customers connected via local transmission lines? If so, how?

**Response 7:**

There are 16 electric generator (EG) customers that are directly served off the backbone transmission system. Please refer to Column C of Table 21A in the SoCalGas/SDG&E Testimony of Frank Seres for the backbone transmission cost absent the reallocation to local transmission.

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**Question 8:**

- 8) D.22-07-002 in the Gas OIR, R.20-01-007, stated at page 8 that: "In its presentation, SoCalGas said that it had 4,130 MMcfd of combined pipeline and storage capacity, and thus was able to meet its 1-in-35 peak day standard, which serves only core customers. However, it was not then able to meet its 1-in-10 peak day standard of 4,983 MMcfd to serve both core and noncore customers." Does this mean that if a 1-in-10 peak day were to occur during the CAP period, some EG load would need to be curtailed? Approximately how much curtailment would be expected under such conditions?

**Response 8:**

At this time, SoCalGas has made no determination regarding its capability to fully serve the 1-in-10-year cold day demand forecast through 2027, nor quantified any potential curtailment. Per SoCalGas Rule No. 23, dispatchable electric generation demand is the first to be curtailed when gas supplies are insufficient to meet customer demand.

Per the Winter 2022-23 Technical Assessment, (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=246873>), SoCalGas found that it had sufficient capacity to serve 4.25 BCFD of winter demand with the level of assumed pipeline and storage supplies, approximately 470 MMcfd short of the 1-in-10 year cold day demand forecast per the 2022 California Gas Report. This shortfall represented about 60% of the forecast electric generation demand per that demand forecast. However, as also stated in the Technical Assessment: "SoCalGas notes that higher inventory levels at its storage fields would result in higher withdrawal rates than those [minimum levels needed for core reliability] shown in Table 3. Under such conditions, SoCalGas could potentially have sufficient capacity to serve a 1-in-10 year cold day demand provided sufficient pipeline supply is delivered to the system." Winter 2022-23 Technical Assessment, page 7.

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**Question 9:**

- 9) Re: Seres Workpaper 17 of 20. Please provide the source documents from which the percentages shown on Line A of each table were derived and explain how the calculations were performed.

**Response 9:**

Applicants object on the ground the request seeks customer-specific information protected by such parties' right to privacy. Hence, the source documents that were used to calculate the percentages shown on Line A of each table of Workpaper 17 are customer specific and confidential information. The customers that are directly off backbone transmission are electric generating (EG) customers. To calculate the percentage on Line A, the volume of the forecasted EG demand that is served directly from backbone transmission is taken from the total volume of the forecasted EG demand. This method was used for both the 1-in-10 year cold day demand forecast and the daily EG Cold Year Demand forecast for the years 2024-27.

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**Question 10:**

10a) Re: Seres Testimony, page 16: SoCalGas proposes that a portion of backbone transmission costs be reallocated to local transmission because some customers are served directly off the backbone system, correct?

10b) Please provide references to any prior CPUC decisions in which such a reallocation was adopted, and indicate whether any such reallocations were or were not the result of a settlement.

**Response:**

- a. No. A considerable number of large customers are served directly from the backbone transmission system without using local transmission lines. In other words, backbone serves a dual function backbone and local transmission for these customers.
- b. Though there were no direct decisions where such reallocation was adopted; relatedly, in the FAR Update D.11-04-032, pg. 22 there was an observation on this matter by the commission, see below.

“It is not possible to verify SDG&E’s/SoCalGas’ assumption that customers served directly from the backbone comprise the same percentage of system demand under both average and cold year peak day demand conditions. However, that this assumption cannot be verified does not justify allocating zero transmission system costs to local transmission. To do so will continue to include local transmission costs that should not be included in the backbone transmission revenue requirement.”

In this FAR Update D.11-04-032 the assumptions could not be verified because SoCalGas did not have the data, but today SoCalGas has the data to verify this event.

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**Question 11:**

- 11) Re: Seres Workpapers 10 and 11 of 20: On these pages eight transmission lines are shown with a partial percentage of backbone and a separate percentage of local (LT). Please explain the basis for the percentage allocations of these lines.

**Response 11:**

The eight transmission lines transition from the backbone to local transmission functions. SoCalGas' engineers identified the physical location where that transition occurs, and the mileage of the pipelines was prorated between the two categories, resulting in the percentages shown.

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**Question 12:**

12) Re: Seres Testimony, page 18, lines 4-10: "Prior to implementation of BTS rates in 2024, PSEP costs and throughput denominator will be updated . . ." Will this update also incorporate any additional incremental balancing costs related to PSEP approved by that date and amortization of the then-current balance in the BTBA?

**Response 12:**

Yes.

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**Question 13:**

- 13) Re: Seres Testimony, page 19, lines 15-17: Please confirm that the capital escalation rates referenced in footnote 61 reflect only utility cost escalation factors and do not include any post-test year capital additions or the proposed post-test year capital exceptions for TIMP, SIMP, GESP or the Honor Rancho Compressor Modernization. Will all or at least some of the post-test year capital related revenue requirements reflected in the GRC testimony of witness Nguyen (Ex. SCG-40-2R, Table KN-7 on page KN-10) be included in the transmission and storage attrition rate increases for 2025-2027? Why or why not?

**Response 13:**

Cost escalation inputs used in the 2024 GRC are from various escalation series from IHS/Markit Global Insight's (Global Insight) Utility Cost Information Service 20 (UCIS). The SoCalGas forecast incorporates utility cost escalators from Global Insight's 4th Quarter 2021 Power Planner Forecast published on January 25, 2022 (2024 GRC, SCG-36).

Post-test year attrition related revenue requirements reflected in the GRC testimony of SoCalGas Witness Nguyen will be included in authorized base margin for cost allocation purposes. Insomuch as this attrition contains capital related revenue requirements, that capital related revenue requirement will be allocated similarly to-base margin revenues. Like authorized base margin revenue, attrition is functionally allocated to customer costs, medium- and high-pressure distribution, backbone transmission, local transmission, and storage.

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**Question 14:**

14) Re: Seres Testimony, Appendix A, Table 1: Please explain when and how entries are made to the ARO accounts in this table for “Investment”, “Accum Dep” and “Net Book Value” over the life of an asset, including an example for a specific asset.

**Response 14:**

Applicants object to this question as being outside the scope of this proceeding and as outside the scope of Applicants’ prepared material because AROs are not included in the rate base, and CAP is a cost allocation of rate base.

Subject to and without waiving the foregoing, Applicants respond as follows:

Please refer to Data Responses below:

1. Data Response from A.18-07-024 TURN-SEU-01 Q13a and Q13d
2. Data Response from A.15-07-014 TURN SEU-03 Q10



TURN-SEU-03\_corrected response 14 v2



TURN-SEU-01.pdf

3.

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**Question 15:**

15) Re: Your response to Data Request TURN-SEU-1, Question 3d: Is the regulatory asset referenced in this response shown anywhere in Appendix A, Table 1?

**Response 15:**

No.

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**Question 16:**

16) Re: Your response to Data Request TURN-SEU-1, Question 4: Based on your answer, would it be correct to say that the cost of removal is collected from customers over the life of an asset as part of the depreciation rate, and that these amounts are intended to cover the cost of any ARO for that asset? If not, please identify and explain what is incorrect about the statement.

**Response 16:**

Yes.

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**Question 17:**

17) Re: Your response to Data Request TURN-SEU-1, Question 10: Is SoCalGas relying entirely on the 2018 storage functionalization cost study for purposes of the allocation percentages assigned to injection, inventory and withdrawal for 4 each account, with no updating except for the dollar amounts in each account? If not, please explain.

**Response 17:**

Yes.

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**Question 18:**

18) Re: Your response to Data Request TURN-SEU-1, Questions 10a-c: Please provide your best current answers to these three questions “based on the judgment and experience of the storage operations group with respect to the function of specific storage assets.”

**Response 18:**

**a) TURN-SEU-1, Question 10a Re: Account 351, Structures and Improvements.**

Please explain how “Withdrawal and injection facilities are separate” and where they are recorded if not in this account. Are personnel involved in injection and withdrawal not housed in Account 351 structures? Is no work related to injection or withdrawal conducted within these structures?

**Response:** Personnel involved in injection and withdrawal activities may be housed or stationed in an Account 351 structure but allocate their labor to other accounts. These other accounts may relate to injection or withdrawal.

**b) TURN-SEU-1, Question 10b Re: Account 352, Wells.**

If “double of the number of wells [are] required for withdrawal than injection,” how many wells are required for inventory? If injection and withdrawal were not of concern, wouldn’t one well suffice to build inventory?

**Response:** The function of wells is to achieve withdrawal and injection volumes at sufficient rates which allows the storage field inventory to be usable based on system demand. A single well would not be sufficient to build inventory in a practical manner. The 2:1 allocation does consider that withdrawal rates need to be high in order to meet demand when supply is low and may need to occur over a short period. This requires additional wells to accommodate. In comparison, injection typically occurs when gas demand is low, to prepare inventory for the upcoming withdrawal season, and can occur over a longer period of time, and therefore does not require such high flow rates. Subsequently, this requires approximately half as many wells to meet operational needs compared to withdrawal.

**c) TURN-SEU-1, Question 10c Re: Account 117.1, Cushion Gas.**

If the purpose of cushion gas is “primarily” to provide a base pressure in the field so that

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minimum field deliverability can be achieved, why not allocate 80% of these costs to withdrawal rather than 67%?

**Response:** The purpose of cushion gas is to provide a sufficient base pressure in the field so that a minimum field deliverability can be achieved. Secondly, the base pressure establishes the lower pressure limit and along with the maximum pressure establishes the storage fields working inventory. Although, no detailed analysis was conducted, it is reasonable that a 2:1 allocation be applied and thus 67% allocation to withdrawal and 33% allocation to inventory.

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**Question 19:**

19) Please provide the number of structures at each SoCalGas storage field whose costs are recorded in Account 351, as well as the number of employees stationed at each such structure.

**Response 19:**

Please see Response 21. Employees allocate labor costs to accounts based on work function rather than where they are stationed.

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**Question 20:**

20) Are there any other structures at the SoCalGas storage fields whose costs are NOT recorded in Account 351? If so, please list those structures, explain the purpose of each one, provide the number of employees stationed at each one, and indicate in which FERC account the costs are recorded.

**Response 20:**

Please see Response 21. Employees allocate labor costs to accounts based on work function rather than where they are stationed.

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**Question 21:**

21) Is it SoCalGas' position that all of the employees included in your answer to Question 19 above work exclusively on the inventory function and that none of them also work on injection or withdrawal? Please explain your answer, whether it is yes or no.

**Response 21:**

No. Although employees may be stationed at a structure identified in Account 351, their labor costs are allocated to other accounts based on work function. For example, a maintenance employee who is stationed at an office structure will report labor costs to Account 818 if working on the compressors. In this example, the employees labor costs are allocated to injection.

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**Question 22:**

22) Please provide the five largest categories of “Other Equipment” recorded in Account 357 and the 2021 net book value for each category.

**Response 22:**

Applicants object to this request on the ground that it seeks information not relevant to this proceeding, not in scope, and not reasonably calculated to lead to the discovery of admissible information. In addition, Applicants also object on the ground the request is overbroad and burdensome. Subject to and without waiving the foregoing, Applicants respond as follows:

The 2021 depreciation, and net book value of investments for Account 357 can be found in Ch.8 Seres Appendix A, Table 1, see row Account 357. Furthermore, description of Account 357- Other Equipment is: This account includes installed storage equipment not assignable to any of the foregoing accounts and typically excludes equipment associated with injection or withdrawal functions. Subsequently it is reasonable to assume an allocation of 100% to the “inventory” function.

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**Question 23:**

23) Re: Your response to Data Request TURN-SEU-1, Questions 16b and 16c: Please provide the source data from which 1.5 and 1.6 customers per service line answers were derived and show all calculations used to determine those figures.

**Response 23:**

See excel file, TURN 2 - Q23.



TURN 2 - Q23.xlsx

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**Question 24:**

24) Re: Your response to Data Request TURN-SEU-1, Question 16d: Please identify where in the workpapers the calculation described in this response is shown. If not shown in the workpapers, please provide these calculations.

**Response 24:**

The number of outlets is shown in the Customer Costs model, tab: service cost detail.

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**Question 25:**

25) Re: Your response to Data Request TURN-SEU-1, Question 18: Please provide the five years of underlying cumulative customer imbalance data on which your answer was based.

**Response 25:**

See excel file, TURN 2 – Q25. The file contains the daily cumulative customer imbalance posted on SoCal Gas' Envoy Daily Operations Report.



TURN 2 -Q25.xlsx

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**Question 26:**

26) Over the last five years, what has been the amount of storage injection and withdrawal capacity reserved for Core use (defined as including the Gas Acquisition Department, core aggregators, and the wholesale core)? If there have been changes in the reservation over that period, please indicate the dates on which those changes were implemented.

**Response 26:**

Decision 16-06-039<sup>1</sup> issued on June 28, 2016, allocated to the core 83 Bcf of storage inventory, 2,225 MMcfd of winter withdrawal, 1,081 MMcfd of summer withdrawal, 388 MMcfd of summer injection, and 210 MMcfd of winter injection. Wholesale core is excluded from the core because they were allocated from the unbundled storage program.

Decision 20-02-045<sup>2</sup> issued on February 28, 2020, allocated to the core (Gas Acquisition, core aggregators, and wholesale core) 76.9 Bcf of storage inventory, 2,000 MMcfd of winter withdrawal with Aliso Canyon available, 1,093 MMcfd winter withdrawal without Aliso Canyon available, 400 MMcfd of summer withdrawal, 455 MMcfd of summer injection, and 155 MMcfd of winter injection. Decision 21-11-008<sup>3</sup> issued on November 5, 2021, allocated to the core 82.5 Bcf of storage inventory while the injection and withdrawal rights remained unchanged.

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<sup>1</sup> Table 6 of D.16-06-039 at p.32

<sup>2</sup> Tables 1 and 2 of D.20-02-045 at p.13-14

<sup>3</sup> D.21-11-008 at p.2

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**(DATA REQUEST TURN-SEU-2)  
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DATE RESPONDED: April 14, 2023**

**Question 27:**

27) For the same five-year period as in Question 26, please provide for each day: the core's nominations of storage injection and withdrawal in Cycle 1 and the final core nominations after Cycle 6.

**Response 27:**

Applicants object on the ground the request seeks information potentially out of scope of the proceeding and to the extent the request seeks information that is private and customer specific. Subject to and without waiving the foregoing, Applicants provide the following response:

See excel file, TURN 2 – Q27. The file contains firm scheduled injections and withdrawals for cycle 1 and 6 for all customers as posted on SoCal Gas Envoy Capacity Utilization Report.



TURN 2 -Q27.xlsx

**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 TURN-SEU-2)  
DATA RECEIVED: March 31, 2023  
DATE RESPONDED: April 14, 2023**

**Question 28:**

28) For the same five-year period as in Question 26, please provide the number of days that the core's reserved inventory capacity was more than 95% full with core gas and the number of days it was 100% full.

**Response 28:**

Applicants object on the ground the request seeks information potentially out of scope of the proceeding and to the extent the request seeks information that is private and customer specific. Subject to and without waiving the foregoing, Applicants provide the following response:

See excel file, TURN 2 – Q28. The file contains the weekly core storage balance as posted on SoCal Gas Envoy Core Storage Balance Report.



TURN 2 -Q28.xlsx

**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 TURN-SEU-2)  
DATA RECEIVED: March 31, 2023  
DATE RESPONDED: April 14, 2023**

**Question 29:**

29) For the same five-year period as in Question 26, please provide the number of days that the core's reserved withdrawal capacity was more than 95% utilized for core service and the number of days in was 100% utilized.

**Response 29:**

Applicants object on the ground the request seeks information potentially out of scope of the proceeding and to the extent the request seeks information that is private and customer specific. Subject to and without waiving the foregoing, Applicants provide the following response:

See Response 27. The excel file, TURN 2-Q27, contains firm withdrawal volumes for all customers.