

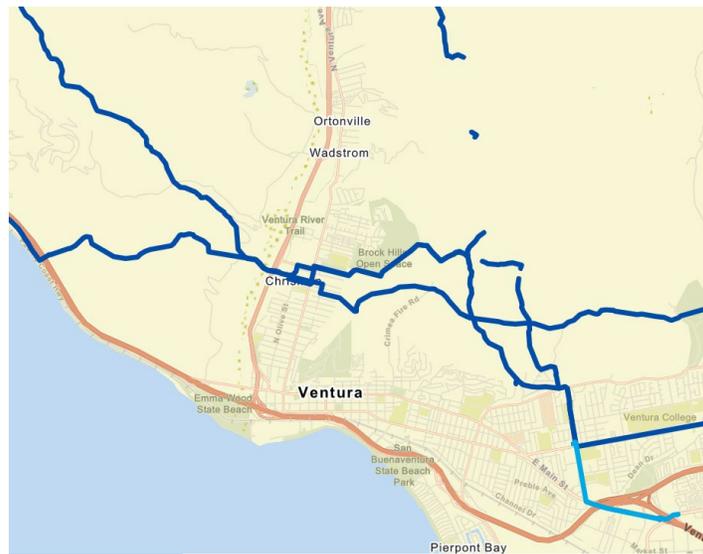
The following response includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE DESIGN PROPOSALS (A.23-08-019)**

**DATA REQUEST Cal Advocates-SCG-01**

**Date Requested: November 15, 2023, Submitted: December 4, 2023**

**QUESTION 1:** The following is a screenshot accessed on 11/14/2023 of the Ventura County map on SoCalGas' natural gas transmission mapping website, <https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map>. This shows the transmission pipeline(s) currently feeding into the Ventura Compressor Station.



For the three alternative locations in the Application (denoted below) which would relocate the Ventura Compressor Station, please identify the number of miles of existing transmission pipelines that would need to be removed, shut in, abandoned-in-place, or taken out of service. Please also estimate the number of miles of additional, new transmission pipeline which would need to be installed in order to bring this alternate location online.

- a. Alternative Location 1: Avocado Site
  - i. Removed
  - ii. Shut in
  - iii. Abandoned in place
  - iv. Taken out of service
  - v. Additional new
  
- b. Alternative Location 2: Devil's Canyon Road
  - i. Removed
  - ii. Shut in
  - iii. Abandoned in place
  - iv. Taken out of service
  - v. Additional new

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- c. Alternative Location 3: Ventura Steel
- i. Removed
  - ii. Shut in
  - iii. Abandoned in place
  - iv. Taken out of service
  - v. Additional new

**RESPONSE 1:**

SoCalGas objects to this request on the grounds it is overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound and vague and ambiguous. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas notes that the three alternatives identified in SoCalGas' Application have been analyzed at a conceptual level and detailed engineering has not been performed. These potential project alternatives conceptually meet the purpose and need of the project, meet certain essential site criteria, could meet operational needs. However, until such time as detailed engineering design is performed, the full scope and cost of these alternatives will remain conceptual.

For all alternatives locations referenced in question 1 the following definitions apply:

- Removed – SoCalGas understands this term to ask about the number of miles permanently and physically removed from service.
- Shut in – SoCalGas understands this term to ask about the number of miles of pipeline taken out of service temporarily in order to perform the tie-in for new segments.
- Abandoned in place – SoCalGas understands this term to ask about the number of miles to be physically separated from the gas system and is no longer maintained under DOT Part 192.
- Taken out of service – SoCalGas understands this term to ask about the number of miles of inactive pipeline that is physically separated from the gas system but is still maintained under DOT Part 192.
- Additional new – SoCalGas understands this term to ask about the number of miles of new pipeline installation required for this alternative.

- a. Alternative Location 1: Avocado Site

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- i. Removed - The existing alignment to the new segment would conceptually require an amount of pipe to be cut and removed to allow for the new tie-ins. An estimate for the amount of pipe to be removed has not been determined at this time since preliminary engineering has not been performed.
  - ii. Shut in – Preliminary engineering would need to be performed to determine the pipeline mileage impacted by the new segments tie-in.
  - iii. Abandoned in place – Since preliminary engineering has not been performed, it is assumed this alternative would not involve abandonment of pipeline in place.
  - iv. Taken out of service – Preliminary engineering would need to be performed to determine if any pipeline segment would be taken out of service for this alternative.
  - v. Additional new – Conceptually, the Avocado site alternative will require approximately 0.18 miles of new pipeline system based on conceptual routing from the map provided in the PEA. This system consists of two suction pipelines and two discharge pipelines with a combined total of approximately 0.36 miles. Additionally, the pipeline within the existing station may also require reconfiguration to allow gas flow to the new location. Detailed engineering would need to be performed to verify the estimate.
- b. Alternative Location 2: Devil’s Canyon Road
- i. Removed – The existing alignment to the new segment would conceptually require an amount of pipe to be cut and removed to allow for the new tie-ins. An estimate for the amount of pipe to be removed has not been determined at this time since preliminary engineering has not been performed.
  - ii. Shut in - Preliminary engineering would need to be performed to determine the pipeline mileage impacted by the new segments tie-in.
  - iii. Abandoned in place – Since preliminary engineering has not been performed, it is assumed this alternative would not involve abandonment of pipeline in place.
  - iv. Taken out of service - Preliminary engineering would need to be performed to determine if any pipeline segment would be taken out of service for this alternative.
  - v. Additional new – Conceptually the Devil’s Canyon site alternative will require approximately 0.97 miles of new pipeline system based on the conceptual routing from the map provided in the PEA. This system consists of two suction pipelines and two discharge pipelines with a combined total of approximately 1.94 miles. Additionally, the pipeline within the existing station may also require reconfiguration to allow gas flow to the new location. Detailed engineering would need to be performed to verify this estimate.
- c. Alternative Location 3: Ventura Steel
- i. Removed – The existing alignment to the new segment would require an amount of pipe to be cut and removed to allow for the new tie-ins. The exact estimate would require detailed engineering which has not been performed.
  - ii. Shut in - Preliminary engineering would need to be performed to determine the pipeline mileage impacted by the new segments tie-in.
  - iii. Abandoned in place – Since preliminary engineering has not been performed, it is assumed this alternative would not involve abandonment of pipeline in place.

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- iv. Taken out of service - Preliminary engineering would need to be performed to determine if any pipeline segment would be taken out of service for this alternative.
  - v. Additional new – Conceptually the Ventura Steel site alternative will require approximately 4.93 miles of new pipeline system based on the conceptual routing from the map provided in the PEA. This system consists of two suction pipelines and two discharge pipelines with a combined total of approximately 6.39 miles. Additionally, the pipeline within the existing station may also require reconfiguration to allow gas flow to the new location. Detailed engineering would need to be performed to verify this estimate.

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**QUESTION 2:** Provide the name(s), pipe diameter(s), and maximum allowed operating pressure(s) (MAOP(s)) of the transmission line(s) that currently enter and exit the Ventura Compressor Station.

**RESPONSE 2:**

SoCalGas objects to this request on the grounds it is overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The suction pipelines for Ventura Compressor Station are [REDACTED] with an MAOP of [REDACTED] pounds per square inch gage (psig) and [REDACTED] with an MAOP of [REDACTED]

The discharge pipelines for Ventura Compressor Station are [REDACTED], both with an MAOP of 1000 psig.

There are other pipelines within the facility boundary that are not directly connected to the compressor station that serve customer demand along the coast, including Ventura.

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**DATA REQUEST Cal Advocates-SCG-01**

**Date Requested: November 15, 2023, Submitted: December 4, 2023**

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**QUESTION 3:** Please provide the following information for the Ventura Compressor station currently (with three 1,100 horsepower (hp) natural gas compressors):

- a. Class Location at the Ventura Compressor station currently
- b. MAOP of pipeline directly exiting the Ventura Compressor currently
- c. Discharge Pressure directly exiting the Ventura Compressor currently
- d. Power capacity required to operate the station currently

**RESPONSE 3:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound and vague and ambiguous. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Class location of the DOT Transmission pipelines at the Ventura Compressor Station currently is [REDACTED]
- b. MAOP of the station piping within the Ventura Compressor Station boundary is designed for [REDACTED] psig.-Currently, the pipeline exiting the Ventura Compressor Station is operating at a maximum operating pressure of [REDACTED] psig due to transmission pipeline class location changes downstream of Ventura station.
- c. Typical discharge pressure when the compressors are operating in the current month is in the [REDACTED] psig range. The discharge pressure can vary based on system requirements. Note that the discharge pipelines are [REDACTED] [REDACTED] (i.e. north of the Ventura Compressor Station).
- d. SoCalGas interprets “power capacity” as the electrical power demand. The maximum threshold electric power demand at the existing Ventura Compressor Station is 199 KW.

Attachment:

- VCM\_A2308019\_CalPA\_SCG\_01\_Q03\_Attach\_01\_VCS\_MeterData

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**DATA REQUEST Cal Advocates-SCG-01**

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**QUESTION 4:** Please provide the following information for the Ventura Compressor Station assuming the main project is approved as proposed in the Application (with two 1,900 hp natural gas compressors and two 2,500 hp electric engines):

- a. Class Location at the Ventura Compressor station in this configuration
- b. MAOP of pipeline directly exiting the Ventura Compressor in this configuration
- c. Discharge Pressure directly exiting the Ventura Compressor in this configuration
- d. Power capacity estimated to operate the station in this configuration

**RESPONSE 4:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Class location of the DOT Transmission pipelines at the Ventura Compressor Station in this configuration is [REDACTED]. The compressor station and piping will be designed to at least a Class 3 Location in accordance with 49 CFR 192.111.
- b. The system will be designed to meet the pipeline MAOP of 1000 psig.
- c. The discharge pressure leaving the station can go up to the MAOP.
- d. SoCalGas is interpreting "power capacity" as the electrical power demand. Based on a preliminary load study, the electric power demand for the Proposed Project is estimated to be 6618 KVA which is equivalent to 5692 KW.

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**DATA REQUEST Cal Advocates-SCG-01**

**Date Requested: November 15, 2023, Submitted: December 4, 2023**

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**QUESTION 5:** Please provide the following information for the Ventura Compressor Station assuming the alternate project at the Avocado Site is approved:

- a. Class Location at the Ventura Compressor station in this configuration
- b. MAOP of pipeline directly exiting the Ventura Compressor in this configuration
- c. Discharge Pressure directly exiting the Ventura Compressor in this configuration
- d. Power capacity estimated to operate the station in this configuration

**RESPONSE 5:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Class location of the DOT Transmission pipelines at the Avocado Site is [REDACTED]. The compressor station and piping will be designed to at least a Class 3 Location in accordance with 49 CFR 192.111.
- b. The system will be designed to meet the pipeline MAOP of 1000 psig.
- c. The discharge pressure leaving the station can go up to the MAOP.
- d. SoCalGas is interpreting "power capacity" as the electrical power demand. Based on a preliminary load study, the electric power demand for this configuration is estimated to be 6618 KVA which is equivalent to 5692 KW.

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**Date Requested: November 15, 2023, Submitted: December 4, 2023**

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**QUESTION 6:** Please provide the following information for the Ventura Compressor Station assuming the alternate project at the Devil's Canyon Road site is approved:

- a. Class Location at the Ventura Compressor station in this configuration
- b. MAOP of pipeline directly exiting the Ventura Compressor in this configuration
- c. Discharge Pressure directly exiting the Ventura Compressor in this configuration
- d. Power capacity estimated to operate the station in this configuration

**RESPONSE 6:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Class location of the DOT Transmission pipelines at the Devil's Canyon Road Site is [REDACTED]. The compressor station and piping will be designed to at least a Class 3 Location in accordance with 49 CFR 192.111.
- b. The system will be designed to meet the pipeline MAOP of 1000 psig.
- c. The discharge pressure leaving the station can go up to the MAOP.
- d. SoCalGas is interpreting "power capacity" as the electrical power demand. Based on a preliminary load study, the electric power demand for this configuration is estimated to be 6618 KVA which is equivalent to 5692 KW.

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**DATA REQUEST Cal Advocates-SCG-01**

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**QUESTION 7:** Please provide the following information for the Ventura Compressor Station assuming the alternate project at the Ventura Steel site is approved:

- a. Class Location at the Ventura Compressor station in this configuration
- b. MAOP of pipeline directly exiting the Ventura Compressor in this configuration
- c. Discharge Pressure directly exiting the Ventura Compressor in this configuration
- d. Power capacity estimated to operate the station in this configuration

**RESPONSE 7:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. Class location of the DOT Transmission pipelines at the Ventura Steel Site is [REDACTED]. The compressor station and piping will be designed to at least a Class 3 Location in accordance with 49 CFR 192.111.
- b. The system will be designed to meet the pipeline MAOP of 1000 psig.
- c. The discharge pressure leaving the station can go up to the MAOP.
- d. SoCalGas is interpreting "power capacity" as the electrical power demand. Based on a preliminary load study, the electric power demand for this configuration is estimated to be 6618 KVA which is equivalent to 5692 KW.

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**QUESTION 8:** In the Application at pages 19-20, SoCalGas notes: “The Proposed Project is designed to increase maximum throughput capacity from 90 [millions of cubic feet per day (MMcfd)] to 160 MMcfd....”

- a. Does SoCalGas expect that there will be 160 MMcfd of natural gas delivered immediately upstream of the Ventura Compressor Station with which to operate the modernized equipment to this expected maximum throughput?
- b. How does SoCalGas expect the volume of gas delivered to the Ventura Compressor Station increase to 160 MMcfd from its current 90 MMcfd?
- c. Will the operations of upstream compressor stations or the MAOP of upstream pipelines be required to change in order to deliver the 160 MMcfd of natural gas to Ventura Compressor Station?
- d. In order to increase gas deliverability exiting Ventura Compressor Station to 160 MMcfd with the proposed project, will SoCalGas:
  - i. Increase the operating pressure of the pipeline exiting the station? If the answer is “Yes” then what would be the anticipated new operating pressure?
  - ii. Run compressors for longer duty cycles than they do currently? If the answer is “Yes” then what is the anticipated daily operations cycle and annual operation cycle?
- e. If SoCalGas intends to increase throughput capacity at Ventura Compressor station by a means other than those described in part d) above, please explain this operation.

**RESPONSE 8:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The system feeding the Ventura Compressor Station has sufficient capacity to supply the 160 MMcfd required by the proposed project, and SoCalGas can move the supplies to the compressor station without additional compression elsewhere on the system. SoCalGas does not intend to increase the pressure on the discharge pipelines above the existing MAOP. Compressor duty cycles (i.e., run time) required are a function of many factors, including the demand on the system, the inventory at La Goleta, and the supplies scheduled onto the system, which vary season to season. As such, SoCalGas has not analyzed the future duty cycle of the compressors.

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**QUESTION 9:** Does SoCalGas anticipate that an increase in demand from the North Coastal System will require changes in operation from La Goleta? If yes, how?

**RESPONSE 9:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas is not anticipating an increase in demand in the North Coastal System, however as explained in the Application on pages 20 and 21, demand on the North Coast has remained relatively constant over the past decade, therefore there are no expected changes in operations at La Goleta.

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**QUESTION 10:** Does SoCalGas anticipate that an increase in storage capacity at La Goleta would be used to serve demand elsewhere in the system? If yes, how and where will additional demand be served? Please quantify.

**RESPONSE 10:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas is not proposing an increase in storage capacity at La Goleta, however the entire existing inventory could be used during the winter season and completely refilled during the summer season. La Goleta can serve parts of the system east of the Ventura Compressor Station directly and can indirectly offset supplies anywhere on the system for use by other customers. The amount of demand that can be served depends on the available inventory at La Goleta, which has a maximum inventory of 21.5 BCF, and the withdrawal rate available at La Goleta, which is dependent on inventory and available wells.

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**QUESTION 11:** In the Application at page 19, Figure 4 indicates a reduction in local California producer supply of Natural Gas injected into La Goleta Storage Field over the past decade.

- a. Does SoCalGas expect production to continue to decline?
- b. Please provide a time series that quantifies the anticipated decrease and time-period over which the decrease is projected.

**RESPONSE 11:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas does not forecast gas supply and has made no such projection of locally-produced gas supplies on the North Coastal System.

The following response includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE DESIGN PROPOSALS (A.23-08-019)**

**DATA REQUEST Cal Advocates-SCG-01**

**Date Requested: November 15, 2023, Submitted: December 4, 2023**

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**QUESTION 12:** The following questions relate to the current and future capabilities at La Goleta.

- a. Does La Goleta currently have the equipment to utilize the expanded delivery capacity from the proposed new Ventura Compressor arrangement, from 90 MMcfd to 160 MMcfd?
- b. Will SoCalGas be required to upgrade equipment at La Goleta to utilize this additional delivery? If yes, please expand on the anticipated work required at La Goleta to utilize additional delivery from Ventura Compressor Station.

**RESPONSE 12:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides for discovery of "any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The La Goleta Storage Field does not require any new equipment, the existing injection capacity is nominally 130 MMcfd with current equipment.

The following response includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE DESIGN PROPOSALS (A.23-08-019)**

**DATA REQUEST Cal Advocates-SCG-01**

**Date Requested: November 15, 2023, Submitted: December 4, 2023**

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**QUESTION 13:** Will SoCalGas be required to install or upgrade equipment that is not at La Goleta to utilize the expanded delivery capacity from the proposed new Ventura Compressor arrangement, from 90 MMcfd to 160 MMcfd? If “yes”, please identify all such equipment that must be installed, and all such equipment that must be upgraded.

**RESPONSE 13:**

SoCalGas objects to this request on the grounds it is not relevant, overly broad, and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which provides for discovery of “any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request on the grounds it is compound. Moreover, SoCalGas objects to the definitions and instructions on the grounds that they are overbroad and unduly burdensome; special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas does not need to install or upgrade equipment outside of La Goleta, other than the proposed VCM project, to facilitate injection.