SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-59)

Date Requested: December 23, 2016
Date Responded: January 13, 2017

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
7. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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Subject: Line 3602 – Cost Effectiveness Analysis (CEA)

QUESTION 1:

SoCalGas/SDG&E have energy efficiency and demand response programs which are demand side variables that affect load. Please describe the role of energy efficiency and demand response programs in the scenario analysis, if any. If these demand-side resources have no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding these programs in the scenario analysis.

RESPONSE 1:

The electric demand values used in the CEA scenario analysis (see CEA page 68, table 35) are considered to be net of effects of energy efficiency and demand response programs. For additional insight, please see page 17 of the Prepared Direct Testimony of Ali Yari for a discussion on demand response programs and impacts on potential outages.

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QUESTION 2:

ORA understands that the nearest two gas receipt points to San Diego for the Southern system are Ehrenberg and Otay Mesa. The scenario analysis includes various assumptions regarding Otay Mesa supply. Please describe the role of Ehrenberg in the scenario analysis, if any. If this receipt point in the Southern system has no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this receipt point in the scenario analysis.

RESPONSE 2:

The scenarios evaluated in the CEA (at Table 34) consider the impacts of both a full outage and a 20% outage of Line 3010. The scenarios assume that gas is available from the El Paso Natural Gas (EPNG) South Mainline system at Ehrenberg, Arizona in sufficient quantities for delivery into both the SoCalGas system at its Ehrenberg Receipt Point for transport to the SDG&E system at Rainbow and for delivery into the North Baja Pipeline System's Ehrenberg Receipt Point for delivery at Otay Mesa to meet the specified requirements.

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QUESTION 3:

Please describe the role of renewable energy generation in the scenario analysis, if any. If the renewable energy generation has no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 3:

In the CEA, renewable energy is a component of the overall electric supply as outlined in the CEA in Table 35 at page 68. In addition to the renewable electric quantities shown in the subject table, it should be noted that electric imports also include electricity that is generated from renewable resources. In addition, behind-the-meter solar generation such as residential rooftop solar reduces the electric demand which the utility must supply. The electric demand values utilized in the scenario analysis account for this and are considered net of any behind-the-meter solar generation. For additional insight, see the Prepared Direct Testimony of Ali Yari, page 16, for the discussion of renewable energy in San Diego and the impacts during a gas curtailment or interruption.

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QUESTION 4:

Please describe the role of distributed energy resources in the scenario analysis, if any. If the distributed energy resources have no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 4:

The CEA assumes that customer electric demand quantities are net of the effects of distributed energy resources such as behind-the-meter solar generation.

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Date Requested: December 23, 2016
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Subject: Design criteria in CEA

Decision 06-09-039, dated September 21, 2006 states1 "IT IS ORDERED that:

1. The Pacific Gas and Electric Company and the Southern California Gas Company shall plan and maintain intrastate natural gas backbone transmission systems sufficient to serve all system demand on an average day in a one-in-ten cold and dry-hydroelectric year.

2. The Pacific Gas and Electric Company and the Southern California Gas Company shall plan their backbone and storage systems so as to meet the peak day criteria already in place for their local transmission systems."

QUESTION 5:

Please provide the design criteria on which the demand forecast in the CEA is based. Please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 5:

Applicants object that Question 5 is vague and ambiguous as to the "demand forecast in the CEA" (whether gas or electric) and "design criteria" (whether gas or electric), as well as assuming facts not in evidence (that the "demand forecast in the CEA" is based on design criteria rather than measures of gas or electric demand). Subject to and without waiving its objections, Applicants respond as follows:

SDG&E's and SoCalGas' (Applicants) integrated natural gas transmission system is designed to meet a 1-in-10 design criterion. The Administrative Law Judge's January 22, 2016 Ruling (Ruling) issued in this proceeding directing the Applicants to create the subject Cost Effectiveness Analysis, however, requires the Applicants to "apply quantifiable data to define the relative [reliability benefits]" of the Proposed Project. For purposes of identifying and quantifying the potential reliability benefits of the Proposed Project, Pricewaterhouse Coopers (PwC), with input from the Applicants, generated a series of plausible scenarios in addition to the 1-in-10 design criterion. The assumptions used to generate these scenarios reflect Applicants' engineering judgment and historical experience operating their integrated natural gas transmission system. These scenarios were generated for the limited purpose of complying with the Ruling within a short timeframe and do not constitute the basis of new design criteria.

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Subject: Energy storage aspect in CEA

Decision 14-03-004, dated March 13, 2014 states,[2] "SDG&E is required to procure at least 25% -- and up to 100% -- of new local capacity from preferred resources. SCE and SDG&E are required to procure at least 50 MW and 25 MW, respectively, from energy storage."

QUESTION 6:

Please describe the role of energy storage in the scenario analysis, if any. If energy storage has no role in the scenario analysis, please explain the reason why this is the case and state the assumption being made regarding this in the scenario analysis.

RESPONSE 6:

Energy storage was not uniquely considered in the CEA scenario analysis as its role and contribution to supplying, managing and delivering energy to end use customers is currently small. It was, and it still is, unknown exactly how and to what extent it will be utilized in the future and how it will impact supplying, managing and delivering energy to end use customers in the future.