

**SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)
(2nd DATA REQUEST SOUTHWEST GAS CORPORATION)**

QUESTION 1:

Besides Southwest Gas, please provide a list of other existing customers that receive transmission level service from interconnects that are directly connected with a SoCalGas' backbone transmission pipeline. Please include in the list the following information:

- a. Customer name;
- b. Line number(s) of backbone transmission pipeline(s) that is directly interconnected with customer's delivery point;
- c. Forecasted annual load.

RESPONSE 1:

- a. SoCalGas and SDG&E object to this request on the grounds that it seeks confidential and proprietary customer information that cannot be disclosed without prior written consent of all affected customers. In addition, SoCalGas and SDG&E object to this request on the grounds that it seeks confidential and proprietary utility trade secrets and utility system information, and it could subject SoCalGas and its customers to security risks and competitive disadvantage if this information were provided in response to the requests.

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QUESTION 2:

Reference is made to Your response to Southwest Gas' Data Request 1-5 – Assume a scenario that SoCalGas receives approval for the backbone only rate structure for new qualifying customers in this TCAP proceeding, and subsequently provides backbone only transmission service to a new qualifying customer (“Backbone Only Customer”) during the current TCAP period. Also, assume SoCalGas files a new TCAP subsequent of the current TCAP period, and the Backbone Only Customer remains a customer on SoCalGas' system throughout the subsequent TCAP period. Under this scenario please provide a response to the following questions:

- a. In the subsequent TCAP proceeding, will SoCalGas classify the Backbone Only Customer as an existing customer?
- b. In the subsequent TCAP proceeding, will SoCalGas assume the Backbone Only Customer will pay the applicable C&I, EOR, or EG Transmission Level Service (TLS) rate when deriving new TLS rates?
- c. If answer to 2-2(b) is no, then please provide an equitable justification as to why only new qualifying customers would continue to receive transmission service under the backbone only rate structure during the subsequent TCAPs, while other existing customers directly connected to SoCalGas' backbone transmission pipelines would not receive transmission service under the backbone only rate structure for the same subsequent TCAP periods.

RESPONSE 2:

- a. No.
- b. No.
- c. A 3-year discount is insufficient to incent the development of truly new load on the backbone system.