SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.1:

With respect to Attachments A-C of the Consolidated Supplemental Testimony served by the Applicants on November 28, 2018, please provide a complete copy of Attachments A-C in electronic format as Excel files. The Excel files should be working files complete with all data, formulas, and links.

RESPONSE 10.1:


Supp Test Att


Supp Test Att

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.2:

Please identify the individual witness (Sharim Chaudhury, David Mercer, or Paul Borkovich) who is responsible for each portion of the Consolidated Supplemental Testimony.

RESPONSE 10.2:

- Testimony relating to Responses to ALJ Ruling Questions 1, 8, and 10 (p. 20, lines 3-15) is offered by Sharim Chaudhury.
- Testimony relating to Responses to ALJ Ruling Questions 2-7 and 9 is offered by David Mercer.
- Testimony relating to Response to ALJ Ruling Question 10, except for the portion identified above for Mr. Chaudhury, is offered by Paul Borkovich,

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.3:

With respect to the statement at page 9 of the Consolidated Supplemental Testimony: "the existing systems were also not designed to support the level of availability and reliability, nor with the necessary processing speeds or memory requirements, that would be required for the capabilities and activities required should core balancing agents be required to balance to actual usage data in a relatively timely manner."

10.3.1. The Applicants previously stated: "The Headend decrypts, consolidates and removes duplicate MTU data from the DCU transmissions for delivery to MDMS every 15 minutes." (Response to SCGC-01, Q.1.2, Mercer Slide 6.) Do the Applicants' consider the Headend system inadequate to "support the availability and reliability" discussed in the quotation?

10.3.2. If the answer to the previous question is "yes," do the Applicants propose to modify the Headend system as part of their proposal?

10.3.3. If the answer to the previous question is "yes," please describe the anticipated modifications, but if the answer to the previous question is "no," would the Applicants expect the existing Headend system to deliver processed data to the AMI Data Aggregation System more frequently than every 15 minutes?

10.3.4. The Applicants previously stated: "MDMS loads the hourly interval data and performs the Validation, Estimation, and Editing (VEE) process. The MDMS, through the AMI Load process, receives and stores the raw reads for billing purposes. The VEE process validates hourly usage data, estimates missing or erroneous values and calculates an estimated energy consumption value (in therms) for on-line energy presentation purposes. The AMI Load Process and the VEE Process are batch processes that are currently scheduled per Figure II-3. Each process can take up to approximately 45 minutes to complete." (Response to SCGC-01, Q.1.2, Mercer Slide 6.)

10.3.4.1. Given that the MDMS processes AMI data for all customers each day, please explain what aspects of the MDMS system render that process unable to "support the level of availability and reliability" referred to in the Applicants

Supplemental Testimony at page 9. For example, is the problem that each batch process takes up to 45 minutes complete or are there too many other competing demands on the MDMS?

10.3.4.2. How much increase in processing speeds do the Applicants believe is required?

10.3.4.3. How much increase in memory requirements do the Applicants believe is necessary?

RESPONSE 10.3:

10.3.1. Yes. The Head End system is currently designed and used for Advanced Meter operations. The Head End system is designed to ingest (i.e., decrypt, consolidate, and remove duplicates) the MTU data. It is not designed to perform data aggregation and the analysis necessary to provide AMI usage data to respective core balancing agents on a daily basis. These types of functions would need to be performed in a different system outside of the Head End system.

10.3.2. SoCalGas and SDG&E object to this question on the grounds that it is vague and ambiguous as to the term "proposal." Subject to and without waiving the foregoing objection, SoCalGas and SDG&E respond as follows:

In SoCalGas' November 28, 2018 Consolidated Supplemental Testimony, SoCalGas and SDG&E offered a high-level outline for a recommended system to allow core balancing agents to balance to actual usage in the event the Commission was to consider such a requirement. In SoCalGas' potential recommended system, the Head End system would send data to the AMI Data Aggregation System as that term is defined in the testimony. Any necessary modifications to the Head End system would be expected to be limited to supporting transferring data from the Head End system to the AMI Data Aggregation System.If the answer to the previous question is "yes," do the Applicants propose to modify the Headend system as part of their proposal?

10.3.3. As previously stated, in the potential recommended system, the Head End system would send data to the AMI Data Aggregation System. It is anticipated that the data from the Head End system would not be sent to the AMI Data

Aggregation System more frequently than every 15 minutes because the Head End system currently delivers data to the MDMS every 15 minutes and the recommended system would seek to leverage this same data transfer process.

10.3.4.1. The MDMS system is not designed to provide AMI usage data to respective core balancing agents on a daily basis because that was not a requirement for MDMS system when it was initially designed. The MDMS system is also a vendor supplied package and does not provide AMI usage data to respective core balancing agents on a daily basis.

10.3.4.2. Unknown at this time because detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage.

10.3.4.3. Unknown at this time because detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.4:

10.4. With respect to the statement at page 9 of the Consolidated Supplemental Testimony: "SoCalGas' existing Data Warehouse, MDMS, and ICDA systems simply cannot adequately support the activities perceived necessary to provide AMI information to respective core balancing agents on a daily basis."

10.4.1. What specific attributes of SoCalGas' existing Data Warehouse render it unsuitable to house the data analysis required to aggregate the AMI data by core balancing agent on a daily basis?

10.4.2. Would the AMI Data Aggregation System be capable of uploading information to the existing Data Warehouse for analysis?

10.4.3. Would the AMI Data Aggregation System be able to interact directly with other systems, such as the CIS, e.g., to upload requisite data from the CIS into the AMI Data Aggregation System?

10.4.4. Would the AMI Data Aggregation System require the creation of an additional Data Warehouse system?

RESPONSE 10.4:

10.4.1. SoCalGas and SDG&E object to this question on the grounds that it is vague and ambiguous as to the phrase "unsuitable to house the data analysis required…." Subject to and without waiving the foregoing objection, SoCalGas and SDG&E respond as follows:

As designed and supported, the Data Warehouse system is not redundant or designed for high availability. The Data Warehouse system's processing power and memory are often near capacity with the current workload. It sometimes experiences intermittent performance and occasional multi-day outages. This level of performance would be inadequate for providing aggregated AMI usage data to core balancing agents on a daily basis. Without having completed a detailed and thorough IT design process, it is believed that the potential AMI Data Aggregation

System is the most appropriate solution to meet the necessary requirements at this time.

10.4.2. Detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, it is currently anticipated that data from the AMI Data Aggregation System could be provided to the Data Warehouse for other uses within the utilities. For instance, the analysis of results over time for the AMI Data Aggregation System could be performed in the Data Warehouse environment rather than the AMI Data Aggregation System so as not to adversely impact the latter's performance or reliability.

10.4.3. Detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, it is currently anticipated that data from the AMI Data Aggregation System would be able to interact directly with other systems, such as CIS.

10.4.4. Unknown at this time because detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.5:

Would the AMI Data Aggregation System be designed to support data availability 8760 hours each year (8784 hours in leap years)?

RESPONSE 10.5:

The AMI Data Aggregation System would be designed to support the level of availability required to provide AMI usage data to respective core balancing agents on a daily basis. As currently envisioned, the system would be supported and maintained every hour of every day.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.6:

If the answer to the previous question is "yes," would additional employees and/or contractors be required?

RESPONSE 10.6:

Unknown at this time because detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, it is expected that the AMI Data Aggregation System would be integrated into the high availability support model that is used for other large systems (e.g., CIS, ENVOY, and CISCO). It is unknown if the addition of the AMI Data Aggregation System will require additional personnel for these monitoring or support organizations.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.7:

Does the AMI Data Aggregation System require the addition of building space beyond the level that will be authorized in the Test Year 2019 GRC to accommodate the hardware, employees, and/or contractors dedicated to the system?

RESPONSE 10.7:

SoCalGas and SDG&E object to this question on the grounds that it is vague, ambiguous, and uncertain as to the phrase "beyond the level that will be authorized in the Test Year 2019 GRC…." Subject to and without waiving the foregoing objections, SoCalGas and SDG&E respond as follows: Detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, the AMI Data Aggregation System is not expected to require additional building space.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.8:

Will the AMI Data Aggregation System require that SoCalGas obtain new licenses for one or more computer operating and/or programming systems?

RESPONSE 10.8:

Specific software requirements are unknown at this time and a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, it is expected that the AMI Data Aggregation System would require new licenses for computer operating and/or programming systems.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.9:

If the answer to the previous question is "yes," please identify the systems for which SoCalGas expects additional licenses would be required.

RESPONSE 10.9:

Specific software requirements are unknown at this time and a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, SoCalGas and SDG&E expect that additional database licenses will be required.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.10:

Will the AMI Data Aggregation System require SoCalGas to obtain new computer software?

RESPONSE 10.10:

Specific software requirements are unknown at this time and a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage; however, SoCalGas and SDG&E expect that software development would be necessary to perform, analyze, and perform quality assurance (QA) on the data aggregation activities and results for the AMI Data Aggregation System.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.11:

If the answer to the previous question is "yes," please identify the software or types of software that SoCalGas expects will be required.

RESPONSE 10.11:

See Response 10.10.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.12:

With respect to the statement at page 10 of the Consolidated Supplemental Testimony: "Second, this timing would support and be consistent with Mr. Borkovich's recommendation that the gas scheduling Cycle 6 (currently 9:00 p.m. on the Gas Day) should be moved to the day following the Gas Day if the Commission were to require core balancing agents to balance to actual demand. Providing core balancing agents with their AMI usage data by 3:00 p.m. the day after the Gas Day would allow six hours during which core balancing agents could make adjustments to their scheduled volumes using a potentially new Cycle 6 nomination deadline of 9:00 p.m. the day after the Gas Day."

10.12.1. Would it be feasible to move Cycle 6 to 9:00 p.m. of the day that is two days after the Gas Day?

10.12.2. If the answer to the previous question is "no," please answer the following questions:

10.12.2.1. Please identify each factor that would prevent the proposal from being feasible.

10.12.2.2. Please explain why each factor would prevent the proposal from being feasible.

RESPONSE 10.12:

10.12.1. No.

10.12.2.1. Moving Cycle 6 to two days after the Gas Day would interfere with storage transactions occurring on the day after the Gas Day. All storage transactions need to be closed no later than the end of the next Gas Day. Moving Cycle 6 in this way could potentially create storage transaction violations by impacting a previous day's storage transactions.

Extending the cycle an additional day would also delay the monthly billing process by delaying the availability of final numbers by an additional day. This could potentially impact the time set aside for monthly imbalance trading.

10.12.2.2. Refer to Response 10.12.2.1.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.13:

With respect to the statement at page 11 of the Consolidated Supplemental Testimony: "SoCalGas and SDG&E preliminarily estimate implementation costs for such an AMI Data Aggregation System to be up to $7 million and that the project to take up to 18 months to complete." Please identify the major milestones for the projects and the deliverables associated with each such milestone.

RESPONSE 10.13:

SoCalGas and SDG&E are unable to provide such a detailed response at this time because project planning would not commence until a decision is rendered in this proceeding and a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.14:

With respect to the statement at page 11 of the Consolidated Supplemental Testimony: "It would be designed and built to support the highest level of availability and reliability and would be supported (define and by whom?) 24 hours per day, 365 days per year."

10.14.1. Please provide the definition of the "highest level of availability."

10.14.2. Please identify who would support the AMI Data Aggregation System.

RESPONSE 10.14:

10.14.1. A detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage, including requirements for the monitoring and support resources; however, it is anticipated that the AM Data Aggregation system would be supported at a level similar to CIS, ENVOY, and CISCO, as described in Responses 10.5 and 10.6.

10.14.2. Unknown at this time because a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage, including the requirements for monitoring and support resources.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.15:

With respect to the statement at page 11 of the Consolidated Supplemental Testimony: "The existing Data Warehouse, MDMS, and ICDA systems? are not capable of providing these required attributes," please explain the question that is raised by the question mark in the statement.

RESPONSE 10.15:

The cited question mark is a typographical error and does not connote a question. The statement in question should be read as though the question mark was not present.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.16:

With respect to the statement at page 11, footnote 28, of the Consolidated Supplemental Testimony: "This preliminary estimate does not include necessary changes and modifications to other SoCalGas and SDG&E systems that may be required for core balancing agents to balance to actual usage," please identify with specificity the necessary changes and modifications to other SoCalGas and SDG&E systems.

RESPONSE 10.16:

All necessary changes and modifications to other SoCalGas and SDG&E systems are unknown at this time and cannot be provided with specificity because a detailed requirements and business process designs would need to be completed if the Commission was to have core balancing agents balance to actual usage. However, a high-level example of such a modification that has been identified would be to the billing system. Additional system enhancements to existing billing system applications would likely be necessary to support a billing true-up mechanism because customers are billed continuously throughout the month, while OFO and EFO charges are calculated at the end of the month. SoCalGas and SDG&E have identified this system enhancement that would need to be more fully developed and analyzed. It is anticipated that there are likely other scenarios that have not yet been discovered that would similarly require modifications.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.17:

With respect to the statement at page 18 of the Consolidated Supplemental Testimony: "many noncore customers rely upon real time measurement information to monitor their operations"

10.17.1. Please admit that "many" does not mean "all."

10.17.2. Provide all evidence in support of your contention that "many noncore rely upon real time measurement information to monitor their operations."

10.17.3. How many noncore customers rely upon real time measurement information to monitor their operations?

10.17.4. What volume of annual gas usage did these customers represent during 2017?

10.17.5. How many noncore customers do not rely upon real time measurement information to monitor their operations?

10.17.6. Assuming "many" does not mean "all," why is the assertion that "many rely upon real time measurement information to monitor their operations" relevant to the Question 10 request for an explanation as to "why SCG should or should not also be required to use day-ahead, interval data to schedule and balance their core load, and be subject to penalties if they fail to balance their actual burn to the OFO limits imposed on other parties."

10.17.7. Please provide all the reasons why the Commission should not require adhering to the same rules as noncore customers who do not rely upon real time measurement information to monitor their operations?

10.17.8. During 2017, how many noncore customers were directly responsible for nominating their supplies of gas for delivery to their premises?

10.17.9. During 2017, how many noncore customers were directly responsible for balancing their scheduled daily quantities to their daily gas consumption?

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

RESPONSE 10.17:

10.17.1. Admit.

10.17.2. This statement is based on Mr. Borkovich's extensive background, training, and experience as an Account Manager and Account Supervisor for refinery, Enhanced Oil Recovery (EOR), large cogeneration, and Utility Electric Generation (UEG) customers. Based on this, it is not uncommon for noncore customers to rely on real-time usage data to monitor their operations because they have the ability and the option to obtain real-time usage data directly from their meters and also have the potential to forecast their usage with great accuracy and directly influence usage decisions. Additional information supporting this statement can be found in the Rebuttal Testimony of Paul Borkovich at 13-14 and SoCalGas' Supplemental Testimony at 17-20. See Response 10.17.3.

10.17.3. This exact number is unknown. SoCalGas and SDG&E are conducting additional research to further inform this response and anticipate providing such information in response to SCGC/IS Data Request No. 11.

10.17.4. This exact number is unknown. See response 10.17.3.

10.17.5. This exact number is unknown. See response 10.17.3.

10.17.6. SoCalGas and SDG&E object to this question on the grounds it is argumentative and seeks a legal conclusion. Subject to and without waiving these objections, SoCalGas and SDG&E respond as follows: See Rebuttal Testimony of Paul Borkovich at 13-15 and Supplemental Testimony of Paul Borkovich at 17-20.

10.17.7. SoCalGas provides the option to noncore customers to obtain real-time usage information directly from their meter. This option is not available or possible for core balancing agents. Requiring core balancing agents to balance to an actual daily number without providing this option would unfairly disadvantage core balancing agents when compared to noncore customers who are able and have the option to obtain real-time usage data directly from their meters and have the potential to forecast their usage with great accuracy and directly influence usage demand.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

10.17.8. SoCalGas and SDG&E object to the question on the grounds that it is vague and ambiguous as to the term "responsible." Subject to and without waiving this objection, SoCalGas and SDG&E respond as follows: During 2017, approximately 27 noncore customers acted as their own balancing agent or had an agent (i.e., the customers did not have a Contracted Marketer).

10.17.9. See Response 10.17.8.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION REGARDING FEASIBILITY OF INCORPORATING ADVANCED METER DATA INTO THE CORE BALANCING PROCESS (A.17-10-002)

(10th DATA REQUEST FROM THE INDICATED SHIPPERS AND SOUTHERN CALIFORNIA GENERATION COALITION)

DATE RECEIVED: 11-29-18

DATE RESPONDED: 12-06-18

QUESTION 10.18:

With respect to the statement on page 19 of the Consolidated Supplemental Testimony: "some noncore customers are able to forecast their usage with great accuracy because their usage is more a function of their own operations and production schedules."

10.18.1. How many noncore customers are able to forecast their usage with great accuracy?

10.18.2. What volume of annual gas usage did these noncore customers represent during the year 2017?

10.18.3. What types, if any, of noncore customers are capable of forecasting their usage with "great accuracy"?

10.18.4. Are electric generators capable of forecasting their usage with "great accuracy"?

RESPONSE 10.18:

10.18.1. This exact number is unknown. This statement was made based on Mr. Borkovich's extensive background, training, and experience as an Account Manager and Account Supervisor for refinery, EOR, large cogeneration, and UEG customers. The statement was made based on observation and experience and no limiting definition was given to the phrase "great accuracy."

10.18.2. This exact number is unknown.

10.18.3. Noncore customers whose usage is a function of their own production operations and production schedules including forecasted production quantities.

10.18.4. SoCalGas and SDG&E rely upon the day-ahead forecast provided by the grid operators and cannot speak on behalf of EG customers' ability to forecast dispatch by grid operators.