

**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 CAUSE-SCG-DR5)**

Date Requested: November 29, 2023, Submitted: December 13, 2023

QUESTION 1: SoCalGas Response to Data Request CAUSE-SCG-02, Q.6 clarifies that Figures 5 and 6 of the CPCN Application depict actual customer demand on the North Coastal System.

- a. Please provide actual customer demand on the North Coastal System for the past 10 years by customer class (e.g. residential, core C&I, Noncore C&I, EOR, EG).

RESPONSE 1:

- a. In order to determine whether information was sufficiently aggregated to comply with applicable confidentiality laws, a 15/15 Rule analysis was applied. The 15/15 Rule comes from the Public Utilities Commission’s decisions setting forth a mechanism for assessing whether customer usage data is sufficiently aggregated to protect customer confidentiality. The 15/15 Rule generally provides that aggregated or anonymized customers’ specific information must be made up of at least 15 customers and a single customer’s load must be less than 15% of an assigned category. If the number of customers in the compiled data is less than 15, or if a single customer’s load is more than 15% of the total data, the 15/15 Rule provides for combining categories or removing non-conforming customer information before the information is released, or otherwise protecting the customer information from public disclosure. Accordingly, the noncore customer classes (noncore C&I, enhanced oil recovery (EOR) and electric generation (EG)) actual customer demand data is aggregated.

2014-2023 North Coastal System/Ventura Compressor Station Mmcf by Customer Class				
Total Ventura:	Annual Usage (MCF)			
Year	Residential	Core C&I	NonCore (C&I, EOR, EG)	Total
2014	7,774,986	4,988,502	7,702,329	20,465,817
2015	7,689,246	5,127,340	7,066,002	19,882,587
2016	8,407,058	5,379,003	7,516,862	21,302,923
2017	8,676,000	5,465,678	7,273,537	21,415,214
2018	8,704,895	5,750,709	6,754,787	21,210,391
2019	9,371,292	5,945,924	7,036,339	22,353,555
2020	9,408,732	5,412,014	5,830,171	20,650,917
2021	9,503,447	5,876,921	6,037,016	21,417,384
2022	9,168,716	5,962,195	6,351,649	21,482,559
2023*	7,455,941	4,466,992	3,728,085	15,651,017

* 2023 data available up to September 2023

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QUESTION 2: Data Request CAUSE-SCG-03, Q.1(b) asked for “the maximum electric compressor *capacity* that could operate at the Ventura Compressor Station that would not require a new substation, other major electrical upgrade and/or deployment of additional electric generation” with all supporting analysis.” In response to this data request, SoCalGas stated that “The maximum number of electric compressors that could operate at the Ventura Compressor Station that would not require a new substation is 2.” This response is non-responsive because it does not provide maximum horsepower (HP) *capacity*. In addition, because compressors come in different HP configurations, simply stating the number of compressors does not indicate total maximum compressor capacity. Please provide the maximum electric compressor *capacity* that could operate at the Ventura Compressor Station that would not require a new substation, other major electrical upgrade and/or deployment of additional electric generation with all supporting analysis.

RESPONSE 2:

SoCalGas objects to this request on the grounds it is duplicative, compound, and argumentative. SoCalGas further objects to this request to the extent it is vague and ambiguous, including with respect to the terms and phrases, “capacity,” “other major electrical upgrade,” and “deployment of additional electric generation.” SoCalGas additionally 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.” 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 maximum electric compressor capacity that could operate at the Ventura Compressor Station that would not require a new substation, other major electrical upgrade and/or deployment of additional electric generation is two 2,500 nominal hp (estimated horsepower) motor-driven compressors¹ as described in the Proposed Project.

¹ To date, electric driven compressors (EDCs) have not yet been selected and detailed engineering has not been completed. For this proceeding, the decision was made to present the maximum EDC motor size (2500 HP) to account for sizing tolerances, equipment performance guarantees, and to avoid underestimating the impacts from the Proposed Ventura Compressor Modernization Project.

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A preliminary electrical load list was developed for the Proposed Project and is estimated to be 5678 KW or 6618 KVA (See Attached Load List). Based on initial discussions and site visits with SoCal Edison (SCE), it was indicated that this electrical load can be serviced through the local distribution system. However, a method of service (MOS) study and further engineering would need to be conducted to confirm if any other major electrical upgrade will be needed.

Attachments:

- VCM_A2308019_CAUSE_SCG_05_Q02_Attach_01_Proposed Project_LoadList

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QUESTION 3: SoCalGas Response to Data Request CAUSE-SCG-03, Q.5(c) calculates the 10-year average summer daily demand on the North Coastal System at 47.73 MMcfd.

- a. Given the historic 10-year average is 47.73 MMcfd, please explain why the “average daily summer demand used in the design on the Project is 60 MMcfd.” (Page 2-8 of PEA).
- b. Please provide average winter daily demand on the North Coastal System for each of the past 10-years.

RESPONSE 3:

SoCalGas objects to this request on the grounds it is compound and argumentative. SoCalGas additionally 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 additionally objects to this request on the grounds certain of the information is publicly available, and thus equally available to the requesting entity. 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. Please refer to Response 5b of CAUSE-SCG-03. SoCalGas designs its system based on forecasted cold year demand to promote maintaining a system that is adequately built to support these conditions. Historical demand does not adequately account for these conditions nor, in particular, the recent unusually warm winters. As stated in the Application on page 20, although system-wide gas demand has been declining, “gas demand in the North Coastal System has remained relatively constant over the past decade.” Even if gas demand were declining, this wouldn’t change the design or need for the Proposed Project because, as stated in the Application on page 57, “the decline is not significant enough to obviate the need for the Proposed Project.”
- b. Average winter daily demand MMcfd on the North Coastal System for 2014-2023 September.

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Year	TT_Mmcf
2014	68.20
2015	66.23
2016	71.65
2017	73.65
2018	71.24
2019	78.16
2020	72.64
2021	72.85
2022	75.98
2023*	80.88
* 2023 data available up to Sep2023	

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QUESTION 4: SoCalGas Response to Data Request CAUSE-SCG-01, Q.5 states that “SoCalGas did not perform hydraulic modeling spanning the entire gas storage injection season for the Application...SoCalGas performs hydraulic modeling of extreme events spanning a 24-hour operating period....”

- a. Please provide a narrative (and/or internal report) describing and the calculations and results of hydraulic modeling (including all foundational data necessary for hydraulic modeling, key pressures and gas flow(s) at key/principal pipeline system nodes) that demonstrates the impact and the necessity of the Ventura Compressor Station on downstream customers and resultant delivery pressure(s) at the La Goleta storage facility during the following times and events:
 - i. Any and all SoCalGas-defined extreme events (including, but not limited to any and all design day condition(s)) spanning a 24-hour operating period;
 - ii. Extreme events as designated by the Commission’s mandated design standards;
 - iii. Extreme forecast high summer demand condition event(s);
 - iv. Extreme low interstate pipeline deliverability event(s) and scenario(s); and
 - v. Any and all Company-defined major infrastructure outage event(s).

RESPONSE 4:

SoCalGas objects to this request on the grounds it is compound, argumentative, and seeks information that SoCalGas does not possess. 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). SoCalGas additionally 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 additionally objects to this request to the extent it is not relevant. This proceeding concerns the Proposed Project and alternatives to modernizing the facility; whether the existing Ventura Compressor Station is needed is not at issue in this proceeding.

The scenarios requested would not “demonstrate the impact and necessity” of the Ventura Compressor Station because the La Goleta Storage Field would be on withdrawal for these conditions.

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As stated throughout the Application and PEA, the Ventura Compressor Station is needed in part to facilitate injection at the La Goleta Storage Field.

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QUESTION 5: Please provide all narratives (and/or internal report(s) and/or presentation(s)) for any and all mass balance calculations performed for the CPCN Application that examined assumed supply and demand under various facility scenarios spanning the summer and winter operating seasons.

Please Note: When developing responses to Questions 4. and 5., the questions are intended to be comprehensive... please specifically provide and note:

1. *Pressures at key pipeline system nodes under design day conditions with and without the Ventura Compressor Station in service that demonstrate areas that would currently experience low pressure (identify the threshold SCG remedies for low pressure deliveries)*
2. *Please provide a North Coast pipeline system map with all pressure and flow capacity values for each and every hydraulic model and/or mass balance calculations generated in responses to Question 5. a. through e. and Question 6. above noted and located.*
3. *Pressures at key pipeline system nodes under design day conditions without the compressor station in service that demonstrates areas that would experience low pressure and/or flow conditions.*
4. *Please provide a detailed narrative of the Goleta Gas Storage facility injection and withdrawal seasons (including the facility injection season pressure / maximum deliverability / duration documentation and/or hysteresis pressure / inventory performance curves for the La Goleta gas storage facility). In addition, please provide similar documentation for the Goleta maximum withdrawal season.*

RESPONSE 5:

SoCalGas objects to this request on the grounds it is compound and argumentative. 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). SoCalGas additionally 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." The mass balance calculations performed do not use hydraulic models, do not consider pressures, and, in the case of the Application, do not consider design day conditions. Subject to and without waiving these objections, SoCalGas responds as follows.

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Please refer to the PEA page 2-8, which explains the mass balance performed for the summer injection season.