

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 1:

The CPCN Application at page 14 states that “The North Coastal System begins at the Ventura Compressor Station, continues west to the La Goleta Storage Field, and ends in the communities served around San Luis Obispo.” On the following page, Figure 3, labeled “North Coastal System Map,” identifies gas system assets in the North Coastal System (e.g. transmission and gas distribution lines). This map is not to scale, nor does it identify the specific geographic boundaries of the North Coastal System.

- a. Please provide a map to scale that delineates the geographic boundaries of the North Coastal System, identifies the major cities inside and outside those boundaries (e.g. Santa Barbara, San Luis Obispo, Paso Robles etc.) and where SoCalGas’ system ends and PG&E’s begins.

RESPONSE 1:

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. SoCalGas additionally objects to this request on the grounds certain of the information sought 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.

Please see the following link for tariff maps depicting service zones on the SoCalGas system:

https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-MAPS_Local_Svc_Zones.pdf

As described in the Application, the “North Coastal System” is comprised of the entire North Coastal System Local Service Zone on pages 3, 4, 7, and 8, and the Coastal System Local Service Zone on pages 4, 7, and 8 generally west of California State Route 33 where the Ventura Compressor Station is located. Maps of SoCalGas’s and PG&E’s territories on the coast do not exist and are not readily available.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 2:

SoCalGas response to Data Request CEJA-SCG-003, Q.7 in A.22-05-015/16 states that “Generally, under periods of low demand, supply from Morro Bay cannot support demand on the Coastal System from Ventura to Orcutt; under periods of higher demand, supply from Morro Bay is consumed entirely by demand in San Luis Obispo and its environs.”

- a. Either on the map provided in response to Question 1 or on a separate map, please delineate “San Luis Obispo and its environs.”

RESPONSE 2:

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 additionally objects to this request on the grounds certain of the information sought 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.

Please refer to Response 1 of this data request for maps depicting the service zones on the SoCalGas system. “San Luis Obispo and its environs,” as referred to in the response, is shown on page 7 from approximately north of Casmalia/T09N R34W in the North Coastal System Local Service Zone and on page 3 in the North Coastal System Local Service Zone.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 3:

SoCalGas response to Data Request CAUSE-SCG-01, Q.3(c) provides a table with the approximate annual flow south of Ventura Compressor Station and the number of days on which southern flow was registered on SoCalGas' SCADA system. The response states that "[t]he data is approximate and should not be construed as accurate."

- a. What does SCADA refer to?
- b. Do the limits on the accuracy of the data apply to both flow volumes and the number of days registered or only to flow volumes?
- c. If available, please provide an estimate of the accuracy range of the data provided (e.g. +/- 10%).
- d. Can hours where gas flows south of the Ventura Compressor Station only occur where the compressor station is not operating? If not, what are the circumstances under which gas could flow south from the compressor station while the compressor station is operational?
- e. Can gas that is registered as flowing south on SoCalGas' SCADA system subsequently move back north of the compressor station? (In other words, can it be assumed that gas flowing south on the compressor station is subsequently consumed south of the compressor station).

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. SoCalGas additionally objects to this request on the grounds certain of the information sought 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. SCADA is the acronym for Supervisory Control and Data Acquisition. On the transmission pipeline system, Gas Control utilizes SCADA technology to monitor pressures, flows, and related data from facilities such as compressor stations, storage fields, pressure limiting stations, and main line isolation valves. The SCADA system uses alarms to notify Gas Control of operating conditions that require attention and enables operators to remotely control system flows and pressures at key points.
- b. The limits apply to the flow volumes and number of days registered.
- c. Metering accuracy at the Ventura metering station is estimated to be within +/- 5%.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

-
- d. Ventura Compressor Station only allows gas to flow south when the station is not operating.
 - e. SoCalGas does not have the capability to measure or monitor if any gas that has flowed south may be compressed north at some time after exiting the station during a southern flow.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 4:

Page 5 of the CPCN Application states that SoCalGas has had to attempt to manage inventory at the Goleta Storage Field “so it does not drop below 7.5 Bcf.”

- a. What is the operational basis for attempting to manage inventory at the Goleta Storage Field at or above 7.5 Bcf?
- b. Is there a specific inventory threshold under which gas cannot be withdrawn from Goleta Storage Field? If so, please state the level of inventory below which gas cannot be withdrawn from the Goleta Storage Field.

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 and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought 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. Page 5 of the Application states, “SoCalGas has had a reduction in injection capacity at the La Goleta Storage Field posted for about the last 10 years and has had to attempt to manage inventory there so it does not drop below 7.5 Bcf.” Please also refer to page 2-8 of the PEA, which explains that SoCalGas can inject about 13 Bcf during the summer, or 8.5 Bcf short of the maximum inventory at La Goleta Storage Field (La Goleta). While La Goleta can be drawn down to 0 Bcf if required for reliability, SoCalGas tries to maintain some amount of inventory to allow for sufficient withdrawal capacity. Please see SoCalGas’s Winter 2022-2023 Technical Assessment, Table 3, for more information regarding the operational basis of maintaining 7.5 Bcf at La Goleta:
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=246873&DocumentContentId=81246>
- b. See response to a.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 5:

Page 19 of the CPCN Application states that “[t]he existing compressors at the Ventura Compressor Station have a throughput design capacity of 90 MMcfd.”

- a. Is throughput design capacity directly related to the horsepower (hp) of the compressor units (e.g., 3,300 hp of compression capacity equals a throughput design capacity of 90 MMcfd)? If not, please explain the relationship between throughput design capacity and hp of compression capacity.

RESPONSE 5:

SoCalGas objects to this request on the grounds it is not relevant, overly broad, duplicative, 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. SoCalGas additionally objects to this request on the grounds the information sought 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.

Excerpt from PEA pages 105 & 106 (Introduction page 2-7): “These three parameters—minimum suction pressure, maximum discharge pressure, and required throughput—are used to determine the required horsepower at a station. In the case of the existing Ventura Compressor Station, the horsepower already exists and cannot be changed, the suction pressure is already set to ensure service to distribution systems, and the discharge pressure is required to serve downstream customers and allow the compression equipment at [La] Goleta to inject into storage. Because these three parameters are fixed, the throughput is limited to 90 MMcfd. When the Ventura Compressor Station was installed in the 1980s, this throughput was sufficient to meet customer and storage needs. Now, the Ventura Compressor Station needs to flow 160 MMcfd, which is 70 MMcfd more than the existing station can provide. Because the minimum suction pressure is fixed and the required discharge pressure is fixed, the only way to increase throughput is to install additional horsepower.”

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 6:

Figure 5 on page 21 of the CPCN Application provides North Coastal System Annual Customer Demand from 2011 to 2022. The footnote to this Figure states “SoCalGas does not produce area-specific forecasts. Figure 5 is based on a systemwide forecast that has been adjusted based on an estimate basis for the North Coastal System.”

- a. Please confirm that the Customer Demand in Figure 5 is not actual customer demand in the North Coastal System from 2011 to 2022 but an estimate based off systemwide demand data.
- b. If Figure 5 is based off an estimate from systemwide demand data, please explain the methodology by which systemwide data was applied to estimate demand on the North Coastal System.
- c. If Figure 5 is based off an estimate from systemwide demand data, please explain why SoCalGas does not have actual historical demand data for the North Coastal system.
- d. If Figure 5 is based off an estimate from systemwide demand data, please explain why SoCalGas was able to provide annual historic demand by customer class for Santa Barbara and San Luis Obispo Counties in response to the June 11, 2021 CPCU-Energy Division Data Request 3 Follow-Up but did not do so for the North Coastal System.

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 and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought 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.

Footnote 15 for Figure 5 on page 21 of the Application is incorrect, the figure depicts actual customer demand. Additionally, Footnote 20 for Figure 6 on page 28 is incorrect and is the same actual customer demand.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 7:

Page 22 of the CPCN Application states that “When customer demand cannot be met, SoCalGas effectuates customer curtailments.”

- a. Please identify all curtailments effectuated by SoCalGas for North Coastal System customers in the past 10 years, the basis for each curtailment, its duration, and the number of impacted core and non-core customers

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. SoCalGas additionally objects to this request on the grounds the information sought 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.

SoCalGas understands this request to seek information regarding curtailments as defined under SoCalGas Rule 23 and responds consistent with this understanding. As a preliminary matter, SoCalGas notes we are providing responsive information to the extent available and subject to SoCalGas’s record retention policies. SoCalGas has provided available information on curtailment events from February 22, 2017 to October 31, 2023. There were no instances of curtailments to core customers in the North Coastal System from February 22, 2017 to October 31, 2023. Carpinteria is included in this response per response to Question 1. See below.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

Start	End	Event	Curtailment Impacts by Customer Type	
			Core	Non-Core
10/22/2021 7:00	10/22/2021 16:30	Planned Maintenance Curtailment City of Orcutt	0	1
8/23/2022 17:00	8/26/2022 16:46	Planned Maintenance Curtailment City of Carpinteria	0	1
2/2/2019 0:00	2/21/2019 23:59	System-Wide Curtailment due to low temperatures and high demand	0	See note*

*Electric generation customers were curtailed in coordination with the electric Balancing Authorities

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 8:

Page 26 of the CPCN Application describes the project as including two 1,900 HP natural gas compressors and two electric compressors with a 2,500 maximum HP capacity for a total of 8,800 HP of compressor capacity. In its 2024 GRC Application, SoCalGas has proposed two 1,900 HP natural gas compressors and two electric compressors with 2,000 HP capacity for a total of 7,800 HP of compressor capacity (See A.22-05-015/016, Exh. SCG-06-2R-E at CHB-B-7). Please explain the basis for increasing total compressor capacity from when the project was proposed in SoCalGas' 2024 GRC Application.

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 and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought 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.

In August of 2021, SoCalGas's Contractor conducted an preliminary analysis of electric motor-driven compressors (EDCs), for the hybrid configuration, including EDCs motors ranging between 2000 horsepower (HP) and 2500 HP with two vendors. In the May 2022 GRC filing, SoCalGas identified 2000 HP EDC motors for the hybrid configuration. In early 2023, SoCalGas had preliminary discussions with one vendor. To date, 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 Ventura Compressor Modernization Project.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 9:

Pages 30-31 of the CPCN Application states that “SoCalGas reduced the injection capacity of the La Goleta Storage Field by 50 MMcfd and posted this reduction to its electric bulletin board, ENVOY. This reduction in capacity took place in March 2013, and the limitation is still in effect.”

- a. Would increasing storage injection capacity at the La Goleta Storage Field by 50 MMcfd from current levels result in an increase in operational costs or capital investments in La Goleta?

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, argumentative, and contradicts information provided in the Application. SoCalGas additionally objects to this request on the grounds the information sought 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. As stated in the Application at page 8, SoCalGas is not seeking to increase injection capacity at the La Goleta Storage Field as part of the Application. The Ventura Compressor Modernization Project will restore injection capacity to fill La Goleta Storage Field to the CPUC-authorized capacity while meeting customer demand.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 10:

Footnote 101 on page 101 of the CPCN Application states that SoCalGas reached out to the property owner of the Devil's Canyon Road Site after the site was identified in the feasibility study.

- a. Please provide all communications with the property owner of the Devil's Canyon road site regarding property acquisition and/or use of site for a compressor station.

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.

Attachments:

- VCM_A2308019_CAUSE_SCG_02_Q10_Attach_01_DevilsCanyonRoadCorrespondence

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 11:

The Proponent's Environmental Assessment states on page 3-7 that four fence-line methane detection monitors were installed in November 2022. The CPCN Application states in footnote 38, page 65 that SoCalGas is still in the process of calibrating, testing, and evaluating the fence-line methane monitoring system.

- a. Please explain what methods are being used to calibrate, test, and evaluate the methane monitoring system.
- b. Please provide the data collected for each monitor, from installation to present.

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 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). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- a. SoCalGas's equipment manufacturer provided the onsite installation and commissioning of the methane sensors. The methane sensing equipment utilized is an open path tunable diode laser sensor with sensing capabilities from 0 to 2500 ppm/m. The evaluation consists of maintainability, reliability, methane sensing accuracy and repeatability. The equipment was installed and commissioned for evaluation in November 2022 and has been performing in accordance to manufacturer specifications. The methods to maintain the equipment include laser head alignment, reflector inspection/cleaning and verification with a known gas source. These units are self-calibrating. SoCalGas has not completed its evaluation for these assets and therefore these assets have not been placed in service.
- b. The data being provided is raw and unreconciled data. Field calibration, post installation, and post configurations have not been finalized, nor has SoCalGas finished establishing baselines, known interferences, and the required corrections to the data. Accordingly, the data as provided is not meaningful qualitatively or quantitatively.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

Attachments:

- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_01_VTSTA_BOREAL1_1_LIGHT
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_02_VTSTA_BOREAL1_1_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_03_VTSTA_BOREAL1_1_R2
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_04_VTSTA_BOREAL1_1_TOTAL_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_05_VTSTA_BOREAL1_2_LIGHT
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_06_VTSTA_BOREAL1_2_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_07_VTSTA_BOREAL1_2_R2
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_08_VTSTA_BOREAL1_2_TOTAL_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_09_VTSTA_BOREAL1_REFQUAL
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_10_VTSTA_BOREAL1_REFR2
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_11_VTSTA_BOREAL1_SUPPLYVOLT
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_12_VTSTA_BOREAL2_1_LIGHT
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_13_VTSTA_BOREAL2_1_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_14_VTSTA_BOREAL2_1_R2
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_15_VTSTA_BOREAL2_1_TOTAL_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_16_VTSTA_BOREAL2_2_LIGHT
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_17_VTSTA_BOREAL2_2_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_18_VTSTA_BOREAL2_2_R2
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_19_VTSTA_BOREAL2_2_TOTAL_PPM
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_20_VTSTA_WS_AIRTEMP_C
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_21_VTSTA_WS_AIRTEMP_F
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_22_VTSTA_WS_DEVICEID
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_23_VTSTA_WS_DEWPOINT_C
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_24_VTSTA_WS_DEWPOINT_F
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_25_VTSTA_WS_RELATIVEAIRPRESSURE
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_26_VTSTA_WS_RELATIVEHUMIDITY
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_27_VTSTA_WS_WINDCHILL_C
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_28_VTSTA_WS_WINDCHILL_F
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_29_VTSTA_WS_WINDDIRECTION
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_30_VTSTA_WS_WINDSPEED_GUST
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_31_VTSTA_WS_WINDSPEED_GUST_MPH
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_32_VTSTA_WS_WINDSPEED_MPPERS
- VCM_A2308019_CAUSE_SCG_02_Q11_Attach_33_VTSTA_WS_WINDSPEED_MPH

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 12:

The Proponent's Environmental Assessment states at page 5.8-11 that "a vapor capture and recovery system will be implemented at the Project Site that will prevent 85%–100% of the natural gas from being released to the atmosphere during venting."

- a. Please provide examples where this same technology has been used, particularly in SoCalGas operated facilities.
- b. Please provide the calculations and full methodology for claiming that 85-100% of natural gas released into the atmosphere during venting will be prevented.

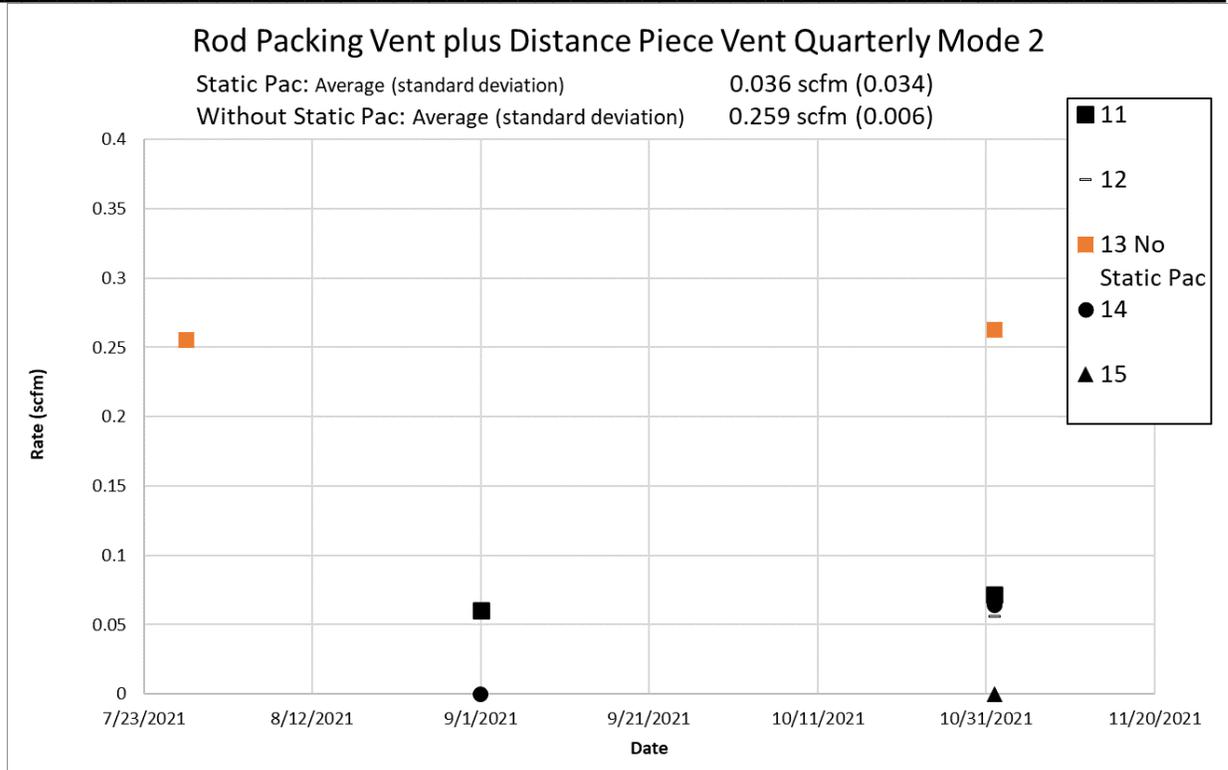
RESPONSE 12:

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 and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought 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. SoCalGas has installed a Static-Pac packing system which is an emission reduction system at its Blythe Compressor Station at Blythe, CA.
- b. The manufacturer of Static Pac, Cook Compression, specifies up to 96% reduction can be achieved. See "Payback Analysis" at the bottom of Page 2 of the Static Pac brochure cookcompression.com/en/products/packing-cases/static-pac-shutdown-seals.html. The brochure is available at the bottom of this page and is attached. At the Blythe Compressor Station, SoCalGas measured venting from the Static Pac on Units 11, 12, 14, and 15 using the methodology described in the California Air Resources Board (CARB) Oil and Gas Rule (arb.ca.gov/resources/documents/oil-and-gas-regulation) and compared it to venting on Unit 13 that does not have Static Pac. As shown in the graph below, the average reduction with Static Pac was 85% is in alignment with manufacturer expected reduction.

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023



Attachments:

- VCM_A2308019_CAUSE_SCG_02_Q12_Attach_01_StaticPac

**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-02)**

Date Requested: October 25, 2023, Submitted: November 10, 2023

QUESTION 13:

In response to CAUSE Data Request 1, Question 1, SoCalGas provided a combined list of planned and unplanned blowdown events from 2015 to July 2021 in
VCM_A2308019_CAUSE_SCG_01_Q01_Attach_13_Ventura Blowdowns_2015_2023.

- a. Please provide the following additional information for each of the identified blowdown events:
 - i. Which events were planned or unplanned;
 - ii. The reason each planned blowdown was needed;
 - iii. The cause of each unplanned blowdown;
- b. SoCalGas' response to Question 1 of Data Request CAUSE-SCG-01 also states that "Each annual NGLA Report, including blowdown data, is posted on SoCalGas's public website, accessible at <https://www.socalgas.com/regulatory/R1501008>." Do the annual NGLA Reports include blowdown events at the Ventura Compressor Station that were not specifically identified in response to this question? If so, please explain why these blowdown events were not listed in response to this data request.
- c. Please identify all blowdowns at the Ventura Compressor Station that have occurred since July 2021.

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 and argumentative. SoCalGas additionally objects to this request on the grounds certain of the information sought 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. See attached.
Attachments:
 - VCM_A2308019_CAUSE_SCG_03_Q13_Attach_01_VenturaBlowdowns
- b. No. All known blowdown events were provided in response to the data request.
- c. No blowdowns are known to have occurred since July 2021.