Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) for Authority to Revise their Natural Gas Rates Effective January 1, 2017 in this Triennial Cost Allocation Proceeding Phase 2

#### PREPARED DIRECT TESTIMONY OF

#### **BRUCE M. WETZEL**

#### SOUTHERN CALIFORNIA GAS COMPANY

#### AND

#### SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

July 8, 2015

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#### PREPARED DIRECT TESTIMONY OF BRUCE M. WETZEL

#### I. PURPOSE

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5 The purpose of my prepared direct testimony on behalf of Southern California Gas 6 Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) is to present the 7 demand forecast for the noncore market segments other than large electric generation (EG) and 8 cogeneration customers (with capacity greater than 20 megawatts (MW)), whose gas demand 9 forecasts are discussed in the prepared direct testimony of Mr. Huang. My testimony also 10 presents the consolidated gas demand forecasts for Average Year and Cold Year temperature 11 conditions, along with peak day and peak month demand forecasts, for the years 2017 through 12 2019 (TCAP period) for SoCalGas' and SDG&E's markets. My consolidated forecasts rely on 13 the forecasts of core commercial & industrial customer demand presented by Ms. Payan and on 14 forecasts of residential customer demand provided by Mr. Teplow. Further, Mr. Teplow 15 provides the underlying heating degree-day design scenarios for Average Year and Cold Year 16 temperature conditions, as well as the peak day temperature design conditions; his testimony 17 discusses these weather parameters for each of SoCalGas and SDG&E. Finally, I provide the 18 calculated allocations of core storage among key core market segments for SoCalGas and 19 SDG&E along with values for unaccounted-for gas and their allocation between core and 20 noncore markets for both Companies.

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#### II. SOCALGAS' NONCORE GAS DEMAND FORECASTS

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#### Introduction

A.

SoCalGas' service to noncore markets is split between retail and wholesale service.Retail service consists of transportation and distribution of gas directly for end-use consumption.

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Wholesale service is provided to municipalities or other investor-owned utilities who re-deliver the gas to their end-use customers. SoCalGas' wholesale customers are the City of Long Beach (Long Beach), SDG&E, the City of Vernon (Vernon), and Southwest Gas Company (SWG).

Noncore retail customers typically represent those with much larger individual loads than
are characteristic of core customers. Also, noncore customers are generally business
establishments with many employees. SoCalGas' overall outlook for customer growth is
summarized in Table 1 below. For the TCAP period, SoCalGas expects steady customer growth
overall and stable customer counts in its retail noncore markets.

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	SocarGas Active Meters (annual averages)						
	2017	2018	2019	3-Year Avg. 2017-2019			
Core							
Total Core	5,766,654	5,825,815	5,886,248	5,826,239			
Noncore							
Noncore C&I	619	621	624	622			
Electric	285	285	284	285			
EOR	29	29	29	29			
Total Retail	933	935	937	935			
Noncore							
Wholesale and International	5	5	5	5			
System Total Active Meters	5,767,592	5,826,755	5,887,190	5,827,179			

Table 1
SoCalGas Active Meters (annual averages)

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Noncore customer and meter counts are developed from base year 2014 data and

11 projected forward based on observed trends and known activity and plans of existing customers

12 from discussions with account executives. Customer/meter counts for the electric generation

13 market segments developed by Mr. Huang are described in his prepared direct testimony.

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**B**.

#### SoCalGas' Noncore Customer Segment Demand

#### 1. Commercial

During the TCAP period, noncore commercial demand is forecast to average nearly
17,326 MDth per year, somewhat higher than 2014 Heating-Degree Day (HDD)-adjusted actual
usage of 17,287 MDth.<sup>1</sup> The increase in the HDD-adjusted average year demand for 2017
through year 2019 is the net result of expected modest growth in this market (including
migration of core commercial load to noncore) net of decreases from expected implementation of
mandated Energy Efficiency and Demand-Side Management (EE/DSM) programs and migration
of noncore commercial load to City of Vernon.

 Table 2

 Average Year Noncore Commercial Demand Forecast (MDth/yr)

	2017	2018	2019	3 Year Avg. 2017-2019
Noncore Commercial	17,427	17,337	17,214	17,326

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#### 2. Industrial

Retail noncore industrial (non-refinery) demand is expected to decline from 51,739 MDth
in 2014 to an average of 50,057 MDth during the TCAP period. Decline of this market segment
from 2014 through the TCAP period is also the net result of expected modest growth in this
market (including migration of core industrial load to noncore) net of decreases from expected
implementation of mandated Energy Efficiency (EE) and Demand-Side Management (DSM)
programs and migration of noncore industrial load to City of Vernon.

<sup>&</sup>lt;sup>1</sup> The HDD-adjusted value for 2014 is 17,287 MDth and reflects the small, but statistically significant, sensitivity to HDD where calendar year 2014 had about 585 fewer HDD than our average year design HDD value of 1,351. The observed value for 2014 was 16,429 MDth less 6 MDth for G30 rule 38 commercial customer load.

1 Refinery industrial demand is comprised of gas consumption by petroleum refining 2 customers, hydrogen producers and petroleum refined product transporters. Refinery industrial 3 demand is forecast separately from other industrial demand because of the complex nature of 4 these customers. These customers are characterized by a complex interaction of refinery 5 operations, on-site production of alternate fuels, and changing regulatory requirements impacting 6 the production of petroleum products. Refinery industrial demand is forecast to average 85,151 7 MDth per year for calendar years 2017 through 2019. This is 1,935 MDth lower than the 87,086 8 MDth recorded for 2014. This decrease is driven by the refineries' use of alternate fuels, such as 9 propane during months when natural gas prices are forecast to be less competitive than the 10 alternate fuel prices. The reduction of refinery gas demand also reflects savings from both 11 Commission-mandated EE programs and other refinery process-related energy-efficient 12 improvements that are ineligible for SoCalGas' EE programs. Additionally, implementation of 13 Low Carbon Fuel Standards and greenhouse gas reduction regulation (Assembly Bill 32) are 14 expected to reduce use of natural gas by refineries over the forecast horizon.

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Average Year Noncore Industrial Demand Forecast (MDth/yr)						
	2017	2018	2019	3 Year Avg. 2017-2019		
Noncore Industrial	50,892	50,043	49,235	50,057		
Industrial Refinery	86,072	85,260	84,121	85,151		
Total	136,965	135,303	133,357	135,208		

#### Table 3

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#### **3.** Electric Power Generation

This sector includes the markets for all industrial/commercial cogeneration, and noncogeneration EG. Small Industrial/Commercial and refinery cogeneration demand is included in this testimony; the other sectors of electric power generation demand are discussed by Mr.
 Huang.

#### (a) Industrial/Commercial Cogeneration <20 MW

Most of the cogeneration units in this noncore segment are installed mainly to generate electricity for customers' internal consumption rather than for power sales to electric utilities or to the California Independent System Operator. In 2014, gas deliveries to this market were 23,059 MDth. Small Industrial/Commercial cogeneration demand is projected to average 22,405 MDth per year during the TCAP period. The reduction in demand is due to the expected increase in the burner-tip price of natural gas relative to retail electricity over the forecast period.

#### (b) Refinery Cogeneration

Refinery cogeneration units are installed primarily to generate electricity for internal use. Refinery-related cogeneration is forecast to increase modestly through 2016/17 and then show declines. The three-year TCAP average is 22,587. This average value turns out to be somewhat higher than the recorded throughput of 22,287 MDth for year 2014.

#### 4. Enhanced Oil Recovery-Cogeneration and Steaming

The Enhanced Oil Recovery (EOR) demand forecast is prepared based on historical throughput, knowledge of customer operations, and general market conditions. For the 2017 to 2019 TCAP period, SoCalGas forecasts EOR—combined for cogeneration and steaming usage—to average 23,157 MDth per year. This is the same as the 2014 recorded gas deliveries of 23,157 MDth; SoCalGas expects this market to exhibit stable throughput throughout the TCAP period.

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#### 5. ECOGAS (Mexicali)

For this forecast, SoCalGas has used a forecast updated from that provided in the 2014 *California Gas Report (CGR)* forecast prepared by ECOGAS of Mexicali. Mexicali's natural

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gas consumption is expected to increase from 7,940 MDth in 2014 to an average of 9,138 MDth
 in the 2017-2019 TCAP period.

#### 6. Wholesale

The forecast of wholesale gas demand includes transportation service to SDG&E, Long Beach, SWG, and Vernon.

The non-electric generation (non-EG) gas demand forecast for SDG&E is made on a customer class basis. Under average temperature conditions, total non-EG requirements for SDG&E are expected to increase from 55,888 MDth in 2014 to an average of 56,720 MDth for the TCAP period.

The forecast of electric generation (EG) gas demand in SDG&E's service area shows a decrease in SDG&E's EG gas requirements from 72,768 MDth in 2014 to an average of 67,288 MDth for the TCAP period. During the TCAP period, EG demand is expected to decline about 4.0% per year, from 70,627 MDth in 2017 to 65,076 MDth in 2019.

For Long Beach, an updated forecast received from Long Beach was used. SoCalGas' transportation deliveries to Long Beach are forecast at 7,352 MDth per year.

The demand forecast for SWG for SoCalGas deliveries to SWG was based on an updated demand forecast from SWG for its southern California markets. The direct service load to SWG is expected to grow 0.9% per year, from 6,481 MDth in 2017 to 6,592 MDth in 2019.

Vernon initiated municipal gas service to its electric power plant in June 2005 and to
noncore customers in December 2006. The forecast annual usage averages 9,514 MDth for the
TCAP period. Vernon's commercial and industrial load is based on recorded 2014 usage for
commercial and industrial customers already served by Vernon, plus those additional customers
who are expected to request retail service from Vernon. Results from the power market

1	simulation model (employed by Mr. Huang and described in his testimony) provided the basis				
2	for our forecast of Vernon's EG gas demand.				
3	III. SOCALGAS CONSOLIDATED GAS DEMAND FORECASTS				
4	A. Introduction				
5	For year 2014, SoCalGas' total gas demand, adjusted to Average Year HDD of 1,351				
6	HDD, totaled 1,024,792 MDth, which is an average of 2,808 MDth/day. In the TCAP period,				
7	SoCalGas expects its Average Year gas demand to decline from 2017 through 2019 at				
8	approximately 0.6% annually. The average for the TCAP years is 964,857 MDth, a decrease of				
9	5.9% from the 2014 Average Year value.				
10 11	<b>B.</b> Consolidated Gas Demand for Average Year and Cold Year				
12	Table 4 shows the composition of SoCalGas' throughput forecast for 2017, 2018 and				
13	2019 under Average Year temperature conditions, and Table 5 shows demand under Cold Year				
14	temperature conditions. <sup>2</sup>				
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<sup>&</sup>lt;sup>2</sup> Gas demand under Average Year temperature conditions is called Average Year Throughput (AYTP) and gas demand under Cold Year temperature conditions is called Cold Year Throughput (CYTP).

Table	4
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Composition of SoCalGas Throughput (MDth/Yr) Average Temperature Year

	2017	2018	2019	3-Year Avg. 2017-2019
Core	-			
Residential	244,825	243,608	242,115	243,516
Core C&I	103,342	102,434	101,179	102,319
Gas AC	77	77	77	77
Gas Engine	2,049	2,070	2,091	2,070
NGV	14,831	15,639	16,599	15,710
Total Core	365,131	363,882	362,061	363,691
Noncore				· · · · ·
Noncore C&I	154,392	152,639	150,571	152,534
EG	268,103	267,235	268,000	267,779
EOR	23,157	23,157	23,157	23,157
Total Retail Noncore	445,652	443,032	441,727	443,470
Wholesale and				
International				
Long Beach	7,309	7,389	7,358	7,352
SDG&E	128,524	124,059	122,885	125,156
SWG	6,481	6,537	6,592	6,537
Vernon	9,371	9,513	9,657	9,514
Mexicali	9,092	9,138	9,183	9,138
Total Wholesale & Intl.	160,777	156,635	155,675	157,696
Average Year Throughput (AYTP)	971,560	963,549	959,463	964,857

		2017	2018	2019	3-Year Avg. 2017- 2019
Core		-			
	Residential	269,689	268,736	267,515	268,647
	Core C&I	108,366	107,423	106,120	107,303
	Gas AC	77	77	77	77
	Gas Engine	2,049	2,070	2,091	2,070
	NGV	14,837	15,693	16,599	15,710
	Total Core	395,019	393,999	392,401	393,806
Noncore			· · · ·		
	Noncore	154,824	153,072	151,004	152,967
	EG	268,103	267,235	268,000	267,779
	EOR	23,157	23,157	23,157	23,157
	Total Retail	446,085	443,465	442,160	443,903
Wholesale Internation	and al				
	Long Beach	7,965	8,049	8,019	8,01
	SDG&E	132,642	128,222	127,090	129,318
	SWG	6,519	6,575	6,631	6,575
	Vernon	9,371	9,513	9,657	9,514
	Mexicali	9,092	9,138	9,183	9,138
	Total	165,590	161,497	160,579	162,555
	Wholesale & Intl.				
Cold Year (CYTP)	Throughput	1,006,694	998,960	995,141	1,000,265

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Table 5

#### C. **Consolidated Peak Day Gas Demand**

SoCalGas uses the following consolidated peak day gas demand for cost allocation and rate design purposes. Table 6 below shows the peak day gas demand for each year of the TCAP period as well as the three-year average for that period.

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	2017	2018	2019	3-Year Avg 2017-2019
Core				
Residential	2,430	2,428	2,424	2,427
Core C&I	589	584	578	584
Gas AC	0.1	0.1	0.1	0.1
Gas Engine	5	5	5	4
NGV	40	42	44	42
Total Core	3,063	3,059	3,051	3,058
Noncore				
Noncore C&I	425	421	415	420
EG	918	905	942	922
EOR	63	63	63	63
Total Retail Noncore	1,407	1,389	1,421	1,405
Wholesale and International				
Long Beach	53	53	53	53
SDG&E	627	635	630	631
SWG	51	52	52	52
Vernon	26	26	27	20
Mexicali	25	25	25	25
Total Wholesale & Intl.	782	791	786	787
Total Peak Day Demand	5,252	5,239	5,258	5,250

Table 6
SoCalGas' Peak Day Demand (MDth/d)

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For retail core HDD-sensitive market segments, peak day demand was calculated using the applicable 1-in-35 peak day temperature condition for SoCalGas or SDG&E. For the SoCalGas retail noncore HDD-sensitive market segment, peak day demand was calculated under a 1-in-10 peak day temperature condition. For the SoCalGas and SDG&E electric generation facilities included in Mr. Huang's testimony, power market simulation model, peak day demand was calculated as a coincident peak day for all these facilities. For all other market segments, peak day load was calculated as average daily December month's demand.

#### D. Consolidated Peak Month Gas Demand

SoCalGas uses gas demand for the month of December as the peak month for cost allocation and rate design purposes. Consolidated forecasts of peak month gas demand are

### 1 shown below in Table 7 for each year of the TCAP period as well as the three-year average for

Table 7

#### 2 that period.

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SoCalGas' Peak Month Demand (MDth/Mo)					
	2017	2018	2019	3-Year Avg. 2017-2019	
Core					
Residential	40,407	40,264	40,081	40,250	
Core C&I	11,965	11,866	11,733	11,855	
Gas AC	3.7	3.7	3.7	4	
Gas Engine	142	144	145	144	
NGV	1,226	1,297	1,372	1,298	
Total Core	53,744	53,574	53,334	53,551	
Noncore					
Noncore C&I	12,632	12,501	12,323	12,485	
EG	23,195	23,397	23,611	23,401	
EOR	1,967	1,967	1,967	1,967	
Total Retail	37,793	37,865	37,901	37,853	
Noncore					
wholesale and international	1 001	1 002	1 002	1 002	
Long Beach	1,001	1,003	1,003	1,002	
SDG&E	14,215	14,127	13,962	14,101	
SWG	1,051	1,060	1,069	1,060	
Vernon	805	816	833	818	
Mexicali	764	768	772	768	
Total Wholesale & Intl.	17,836	17,775	17,639	17,750	
Total Peak Month Demand	109,373	109,214	108,874	109,154	

For HDD-sensitive market segments, December HDD for cold year temperature designs

were used to calculate gas demand.

#### IV. SDG&E'S NONCORE GAS DEMAND FORECASTS

A. SDG&E's Noncore Gas Demand

This forecast presents noncore customer gas demand for SDG&E, with the exception of gas requirements for non-cogeneration EG demand discussed by Mr. Huang. Gas demand forecasts for commercial & industrial and cogeneration are derived by trending recorded data for

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1 2007 through 2014 driven primarily by expected growth in commercial and industrial (C&I) 2 employment in San Diego county. C&I non-cogeneration gas demand is adjusted to reflect 3 decreases from expected implementation of mandated EE and DSM programs. The data in Table 4 8 below shows SDG&E's noncore throughput each year for the TCAP period, as well as the 5 three-year average.

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<b>Composition of</b>				
	2017	2018	2019	3-Year Avg. 2017-2019
NonCore				
Noncore C&I	4,590	4,608	4,618	4,605
Electric Generation	70,627	66,160	65,076	67,288
Total Retail Noncore	75,217	70,768	69,694	71,893

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#### **Noncore Commercial and Industrial**

SDG&E's noncore commercial and industrial demand is expected to grow about 0.3% per year in the TCAP period, from 4,590 MDth in 2017 to 4,618 MDth by 2019. Noncore commercial and industrial load was 4,000 MDth for 2014.

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#### 2. **Electric Power Generation**

Cogeneration gas demand is included in this testimony; the other sources of electric power generation demand (power plant facilities) are discussed in the direct testimony of Mr. Huang. SDG&E's cogeneration load was 17,452 MDth in 2014. Cogeneration load is expected to grow 0.3% per year in the TCAP period, from 19,094 in 2017 to 19,191 MDth by 2019.

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#### V. **SDG&E CONSOLIDATED GAS DEMAND FORECASTS**

A. Introduction

18 SDG&E's total throughput (gas sales and transportation), adjusted to Average Year HDD 19 of 1,303 HDD, totaled 128,656 MDth for year 2014, an average of 352 MDth/day. In the 2017 20 to 2019 TCAP years, SDG&E expects Average Year throughput to decline at about 2.2%

1 annually from 2017 through 2019. Total Average Year throughput for the TCAP years is

124,166 MDth, a decrease of 3.6% over the 2014 value.

SDG&E's noncore customer count is expected to be stable, while the number of core

customers is expected to increase, as explained by Ms. Payan, over the three-year TCAP period.

#### Table 9

SDG&E Meters (Annual Averages)				
	2017	2018	2019	3-Year Avg. 2017-2019
Core				
Total Core	901,551	914,860	928,370	914,927
Noncore				
Noncore C&I	52	52	52	52
EG	73	70	70	71
Total Retail Noncore	125	122	122	123
System Total Meters	901,676	914,982	928,492	915,050

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#### B. Consolidated Gas Demand for Average Year and Cold Year

Tables 10 and 11 show the details of SDG&E's forecast annual gas demand under

Table 10

Average-Year and 1-in-35 Cold-Year temperature conditions, respectively.

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Composition of SDG&E Throughput (MDth/Yr) Average Temperature Year					
	2017	2018	2019	3-Year Avg. 2017-2019	
Core					
Residential	31,912	32,014	32,069	31,998	
Core C&I	18,468	18,290	18,040	18,266	
NGV	1,747	1,848	1,955	1,850	
Total Core	52,127	52,152	52,063	52,114	
Noncore					
Noncore C&I	4,590	4,608	4,618	4,605	
Electric Generation	70,627	66,160	65,076	67,288	
Total Retail Noncore	75,217	70,768	69,694	71,893	
Average Year Throughput (AYTP)	127,345	122,921	121,757	124,008	

Composition of SDG&E Th	Composition of SDG&E Throughput (MDth/Yr) 1-in-35 Cold Year Temperature					
	2017	2018	2019	3-Year Avg. 2017-2019		
Core						
Residential	35,283	35,435	35,542	35,420		
Core C&I	19,178	18,994	18,734	18,969		
NGV	1,747	1,848	1,955	1,850		
Total Core	56,208	56,277	56,231	56,239		
Noncore						
Noncore C&I	4,590	4,608	4,618	4,605		
EG	70,627	66,160	65,076	67,288		
Total Retail Noncore	75,217	70,768	69,694	71,893		
Cold Year Throughput (CYTP)	131,426	127,046	125,924	128,132		

Table 11

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# C. Consolidated Peak Day Gas Demand

SDG&E uses the following consolidated peak day gas demand for cost allocation and

Table 12

rate design purposes. Table 12 below shows the peak day gas demand.

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SDG&E's Pe	SDG&E's Peak Day Demand (MDth/d)					
	2017	2018	2019	3-Year Avg. 2017-2019		
Core						
Residential	289	291	293	291		
Core C&I	91	90	88	90		
NGV	5	5	5	5		
Total Core	385	386	387	386		
Noncore						
Noncore C&I	13	13	13	13		
Electric Generation	224	231	224	226		
Total Retail Noncore	237	243	237	239		
Total Peak Day Demand	622	630	624	625		

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For SDG&E's HDD-sensitive core market segments, peak day demand was calculated under a 1-in-35 peak day temperature condition. For the SDG&E (and SoCalGas) electric generation facilities included in Mr. Huang's power market simulation model, peak day demand was calculated as a coincident peak day for all these facilities. For all other market segments,

peak day load was calculated as average daily December month's demand.

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### D. Consolidated Peak Month Gas Demand

SDG&E uses gas demand for the month of December as the peak month for cost allocation and rate design purposes. Consolidated forecasts of peak month gas demand are shown in Table 13 below.

	Table 13	3		
SDG&E's Pe	ak Month De	emand (MDtl	h/Mo)	
				3-Year Avg. 2017-
	2017	2018	2019	2019
Core				
Residential	5,133	5,155	5,171	5,153
Core C&I	2,061	2,041	2,013	2,038
NGV	152	160	170	161
Total Core	7,346	7,357	7,354	7,352
Noncore				
Noncore C&I	401	402	402	402
EG	6,338	6,239	6,078	6,219
Total Retail Noncore	6,739	6,641	6,481	6,620
Total Peak Month Demand	14,084	13,998	13,834	13,972

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For HDD-sensitive core market segments, December HDD for SDG&E's cold year temperature design was used to calculate gas demand.

### VI. Core Storage Allocations and Unaccounted-For Gas

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## **Core Storage Allocations**

The following storage assets are allocated to serve the core customers of SoCalGas and

# 14 SDG&E combined:

A.

- Storage Inventory of 83 Bcf,
- Winter Months' Withdrawal Capacity of 2,225 MMcfd, and
- Summer Months' Injection Capacity of 388 MMcfd.

These storage assets are the ones recommended by Mr. Watson in his prepared direct testimony on p. 11 in Table 3 in A.14-12-017, the TCAP Phase 1 Application. The purpose of my testimony regarding these assets is to provide the accompanying allocation of these overall core asset levels to (1) SoCalGas and (2) SDG&E for each Company's respective core rate classes.

Table 14 shows the allocation of the storage assets for SoCalGas' core customers by customer class, and Table 15 shows the resulting storage asset allocation by customer class for SDG&E's core customers. These allocations are based on the monthly core demand forecasts presented in Mr. Teplow's and Ms. Payan's direct testimony. These core storage capacity allocations are used by Mr. Bonnett in allocating storage costs among SoCalGas' and SDG&E's core customers respectively.

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		Table 14	4			
SoC	CalGas Core Stora	age Allocat	tions by Cu	istomer C	lass	
Storage Asset	Residential	G-10	G-AC	G-EN	G-NGV	Total SoCalGas Core
Inventory (BCE)	60.9	11.0	0.0	03	0.9	73
Injection (MMcfd)	284.9	51.5	0.0	1.3	4.0	342
Withdrawal (MMcfd)	1,568.6	377.3	0.1	3.0	27.1	1,976

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		Table 15			
SD	G&E Core Storage	Allocatio	ns by Custon	ner Class	
Storage Asset	Residential	GN-3	G-NGV	Total SDG&E Core	Total SoCalGas and SDG&E Core
Inventory (BCF)	8.1	1.7	0.1	10	83
Injection (MMcfd)	37.7	8.1	0.5	46	388
Withdrawal (MMcfd)	187.9	57.8	3.3	249	2,225

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#### Unaccounted-For (UAF) Gas

The calculation of the volumes related to UAF gas is comprised of the following major elements: accounting corrections and prior period adjustments; measurement adjustments; leakage; theft; and other unexplained unaccounted-for volumes of gas. The cumulative recorded UAF gas, for the months April through March production cycles in 2012-2013, 2013-2014, and 2014-2015 for SoCalGas and SDG&E are shown in Table 16 and Table 17 below, along with UAF gas as percentages of total gas receipts.

					UAF % of Receipt	S
6 Months' Total	Total Receipts (MMBtu)	Total Deliveries (MMBtu)	UAF (MMBtu)	System- Wide	Core	Noncor
Apr-12 - Mar-15	3.044.859.577	3.019.432.046	25.427.531	0.835%	0.594%	0.2419
<u></u>						
		Tabla 17				
	SDG&E UA	Table 17	y Customer (	Class		
	SDG&E UA	Table 17 AF Allocations b	y Customer (	Class	UAF % of Receipt	s
36 Months' Total	SDG&E UA Total Receipts (MMBtu)	Table 17 <u>F Allocations b</u> Total Deliveries (MMBtu)	y Customer ( UAF (MMBtu)	Class System- Wide	UAF % of Receipt Core	s Noncor

1	has a UAF gas allocation factor of 59% to the core and 41% to the noncore. SoCalGas and
2	SDG&E propose that the UAF percentages for each utility be updated and based on the April
3	2012 to March 2015 three-year average of 0.835% for SoCalGas, shown in Table 16, and
4	0.532% for SDG&E as shown in Table 17. SoCalGas and SDG&E propose that the percentage
5	allocations between core and noncore for each Company be the values determined in the 2006
6	UAF studies for each respective Company. For SoCalGas, the core percentage is 71.1%
7	(noncore is then 28.9%), and, for SDG&E, the core percentage is 76.71% (noncore is then
8	23.29%). The monthly total of deliveries, receipts, and UAF are shown in detail in the
9	accompanying workpapers, along with a copy of the 2006 UAF Study covering both Companies.
10	The resulting core UAF factor for SoCalGas is $0.594\%$ ( $0.835\%$ x $0.711 = 0.594\%$ ) and
11	0.241% for the noncore (0.835 x $0.289 = 0.241\%$ ). For SDG&E, the resulting factors are
12	0.408% (0.532% x 0.7671 = 0.408%) for the core and 0.124% (0.532% x 0.2329 = 0.124%) for
13	the noncore.
14	This concludes my prepared direct testimony.
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#### VII. QUALIFICATIONS

My name is Bruce M. Wetzel. My business address is 555 West Fifth Street, Los Angeles, California 90013-1011. I am employed by SoCalGas as a Forecasting Advisor in the Regulatory Affairs Department. I am responsible for the preparation and consolidation of natural gas demand forecasts together with the acquisition and analysis of daily weather data used to prepare gas demand forecasts for SoCalGas and SDG&E. I have been in this position since March 2004.

My academic and professional qualifications are as follows: I earned an undergraduate degree in mathematics from Drexel University, a Master of Science in Operations Research from George Washington University, and a Ph.D. in Public Policy Analysis from the Pardee-RAND Graduate School for Public Policy Analysis (formerly, the RAND Graduate School). In addition, during the past 33 years, I have held analyst positions in the Regulatory Affairs, Commercial and Industrial Services, and Gas Supply Departments of SoCalGas.

My employment outside of SoCalGas has been in the areas of public policy analysis/research and applied mathematics and operations research at the RAND Corporation in Santa Monica and for the U.S. Department of the Air Force in Washington D.C.

I have previously testified before the California Public Utilities Commission.

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