# Date Requested: February 5, 2024, Submitted: February 20, 2024

## **Question Set 1**: On page 16 of its Application, SoCalGas writes:

The changed operating environment in recent years—whereby virtually all demand in the North Coastal System is supported by the Ventura Compressor Station—has impacted deliveries to the La Goleta Storage Field: the daily injection capacity at the La Goleta Storage Field is currently reduced by 70 million cubic feet per day (MMcfd). The Proposed Project is thus necessary both to serve customer demand in the North Coastal System and to support injection into the La Goleta Storage Field.

- 1. Please provide the daily injection capacity at the La Goleta Storage Field from January 1, 2004 to December 31, 2023 in an .xlsx worksheet.
- 2. Positive values should mean injections into the storage field, while negative values should be withdrawals from the storage field.

## **RESPONSE 1:**

Please see the attachment. Injection capacity is only available starting 1/1/2012. The provided information is unadjusted/uncorrected operational data and should not be considered billing quality (i.e., actual). Subject to these important caveats, SoCalGas undertook reasonable efforts to otherwise validate the accuracy of this information in the format it was retrieved (i.e., unadjusted/uncorrected operational reads), but no representation is made that the contents are free from error. SoCalGas assumes no responsibility for use of, or reliance on, this information by any party.

# Attachment:

• VCM\_A2308019\_CalPA\_SCG\_01\_Q01\_Attach\_01\_ GoletaInjCap

# Date Requested: February 5, 2024, Submitted: February 20, 2024

## **Question Set 2:** On page 31 of its Application, SoCalGas writes:

The existing facility and horsepower provided was sufficient in the past, but today's conditions given the steep decline in the availability of local supplies north of the compressor station necessitate redistributing gas (approximately 70 MMcfd)[footnote removed] from the south to support reliability in the North Coastal System, where gas demand is expected near existing levels over the next decade.

- Regarding the necessitated redistribution of approximately 70 MMcfd of gas from the south to support reliability in the North Coast system stated in the passage, please identify the specific sources of natural gas in the south captured by this passage. Acceptable examples of the term, "source," include, but are not limited to natural gas storage fields or regional natural gas producers.
- 2. If natural gas storage fields are an example of sources from which the 70 MMcfd is redistributed from the south, please identify these fields and estimate MMcfd of gas transported from each source.
- 3. If there are examples of "sources" other than natural gas from which the 70 MMcfd is redistributed from the south other than gas storage, please identify and estimate MMcfd of gas transported from each source.

# **RESPONSE 2:**

The proposed project would allow SoCalGas to move supplies from the rest of the transmission system into the North Coastal System, with access to the interstate and intrastate receipt points and storage, either directly or through displacement. SoCalGas does not control where or how much supplies received, but rather redelivers those supplies to customers while maintaining the integrity of the system, and as such there is no specific source dedicated to supply the North Coastal System. That said, the physical supplies that are most likely to reach the North Coastal System, outside of local production and the La Goleta Storage Field, are from the Wheeler Ridge Zone, the Northern Zone, and the Honor Rancho Storage Field.

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<u>Question Set 3:</u> On Figure 9 on page 38 of its Application, SoCalGas plots the La Goleta Storage Field's inventory in MMcf.

1. Please provide the gas inventory at the La Goleta Storage Field from January 1, 2004 to December 31, 2023 at the smallest time intervals available (e.g. daily, weekly, or monthly) in an .xlsx worksheet.

## **RESPONSE 3:**

Please see the attachment. The provided information is unadjusted/uncorrected operational data and should not be considered billing quality (i.e., actual). Subject to these important caveats, SoCalGas undertook reasonable efforts to otherwise validate the accuracy of this information in the format it was retrieved (i.e., unadjusted/uncorrected operational reads), but no representation is made that the contents are free from error. SoCalGas assumes no responsibility for use of, or reliance on, this information by any party.

Attachment:

• VCM\_A2308019\_CalPA\_SCG\_01\_Q03\_Attach\_01\_ GoletaInventory

## Date Requested: February 5, 2024, Submitted: February 20, 2024

**Question Set 4:** On Figure 9 on page 39 of its Application, SoCalGas plots the La Goleta Storage Field's inventory (in MMcf) over an entire injection and withdrawal season under several scenarios including two where one compressor unit at Ventura Compressor Station is out of service (OOS).

- 1. For the period from January 1, 2004 to December 31, 2023, please provide a complete list, with one item for each separate occasion when a compressor unit has been out of service.
- 2. For each item in the list provided under Question Set 4, part 1, please provide:
  - a. The unit/units that experienced being out of service;
  - b. The duration, including start and end dates, for which each unit/units were not operational;
  - c. All reasons the unit/units were out of service (One example of such a reason might include whether this was a scheduled maintenance or whether it was unplanned).

#### **RESPONSE 4:**

See attached for when the one or more compressors were out of service from 2016 to 12/31/2023. SoCalGas is continuing to search records for when one or more of the compressors were out of service prior to 2016, and if available, will provide it as a supplement.

Attachment:

• VCM\_A2308019\_CalPA\_SCG\_01\_Q04\_Attach\_01\_VCS\_OOS\_Data

## Date Requested: February 5, 2024, Submitted: February 20, 2024

<u>Question Set 5:</u> On Figure 9 on page 39 of its Application, SoCalGas plots the La Goleta Storage Field's inventory (in MMcf) over an entire injection and withdrawal season under several scenarios including two where there is "No North Coast Supply".

- 1. For the period from January 1, 2004 to December 31, 2023:
  - a. Please provide a list of occasions when North Coast Supply has been unavailable.
  - b. Please identify the duration, including start and end dates, for which the supply was unavailable.
  - c. Please provide all reasons supply was unavailable (One example of such a reason could include whether this was a scheduled maintenance or whether it was unplanned).

### **RESPONSE 5:**

SoCalGas objects to this request on the grounds it is vague and ambiguous. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Based on the description of the figure in this question, SoCalGas interprets this question as referring to Figure 10 in the Application rather than Figure 9.

The requested data does not exist. By way of explanation, the issue is not whether North Coast Supply from PG&E has been available or unavailable in the past or into the future, or for how long, or for what reason; the issue is that PG&E has no obligation to deliver supply to our customers on the North Coastal System and that PG&E has not offered firm transportation service to SoCalGas for that supply. SoCalGas has a need to maintain inventory at our La Goleta storage field for reliability to our customers and for system integrity, and Figure 10 is meant to show the projected consequence of relying upon North Coast Supply that is neither firm nor guaranteed.

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<u>Question Set 6:</u> Has North Coast Supply ever been unavailable for an entire injection season in the history of SoCalGas' operation of La Goleta?

#### **RESPONSE 6:**

Please refer to Response 5 of this data request.

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**Question Set 7:** Please provide the methods and any analysis that SoCalGas has undertaken to estimate:

- 1. The consequence of the North Coast Supply being unavailable during an entire injection season.
- 2. The likelihood of the North Coast Supply being unavailable during an entire injection season.

## RESPONSE 7:

Please refer to Response 6 of this data request.

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# **Question Set 8:** On page 21 of its Application, SoCalGas writes:

In D.06-09-039, the Commission mandated reliability criteria of 1-in-35 year peak day demand (i.e., an event that may be seen statistically once in a thirty-five-year period) and 1-in-10 year cold day demand (i.e., an event that may be seen statistically once in a ten-year period) conditions.

- 1. Please cite the page number(s) of D.06-09-039 where SoCalGas interprets the Commission mandating the reliability criteria of 1-in-35 peak day demand conditions.
- 2. Please quote the language in D.06-09-039 that SoCalGas interprets the Commission as mandating the reliability criteria of 1-in-35 peak day demand conditions.
- 3. Please cite the page number(s) of D.06-09-039 where SoCalGas interprets the Commission mandating the 1-in-10 year cold day demand conditions.
- 4. Please quote the language in D.06-09-039 that SoCalGas interprets the Commission as mandating the reliability criteria of 1-in-10 year cold day demand conditions.

# **RESPONSE 8:**

SoCalGas objects to this request on the grounds certain of the information sought is publicly available, and thus equally available to the requesting entity. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

- 1. Page 49 and 50. Also see D.22-07-002 in R.20-01-007, Ordering Paragraphs 1, 2, and 8.
- "The Commission requires SDG&E and SoCalGas to apply the following planning criteria to their local transmission systems: the systems must be designed to provide service to core customers during a 1-in-35 year cold day event (one curtailment event in 35 years) and service to firm non-core customers during a 1-in-10 year cold day event (one curtailment event in 10 years)."
- 3. See response Q8.1. Also see D.22-07-002 in R.20-01-007, Ordering Paragraphs 1, 2, 4 and 8.
- 4. See response Q8.2.

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**Question Set 9:** On page 40 Figure 11 of its Application, SoCalGas provides "La Goleta Inventory Projection with Proposed Project and Winter 2022/2023 Withdrawal".

In an .xlsx worksheet, please provide the injection scenarios, including the underlying injection scenario data, related to the projections shown in Figure 11 found on page 40 of the Application.

#### RESPONSE 9:

Please see the attachment.

Attachment:

• Confidential\_VCM\_A2308019\_CalPA\_SCG\_01\_Q09\_Attach\_01\_ AppFig11Data. The attachment includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration.