



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED
02/06/19
04:59 PM

Application of Southern California Gas Company
(U 904 G) and San Diego Gas & Electric Company
(U 902 G) Regarding Feasibility of Incorporating
Advanced Meter Data Into the Core Balancing
Process.

A.17-10-002
(Filed October 2, 2017)

**SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS &
ELECTRIC COMPANY'S (U 902 G) REPLY BRIEF**

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Dated: February 6, 2019

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In accordance with Rule 13.11 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure and the August 20, 2018 and October 22, 2018 Email Rulings by Administrative Law Judge (ALJ) Brian Stevens, the latter of which modified the procedural schedule to permit this filing by February 6, 2019, Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) submit their reply brief.

I. INTRODUCTION

Intervenors seek to overturn the Commission's findings and orders in Decision (D.) 07-12-019 (Omnibus Decision). Intervenors assert that conditions have changed since D.07-12-019, however, no intervenor has shown that core balancing agents, including the Gas Acquisition Department, have access to real-time usage data, information, or measurement against which to balance to actual usage. Accordingly, core balancing agents should continue to balance to a forecast based on D.07-12-019.

In this proceeding, SoCalGas and SDG&E have proposed to incorporate advanced meter infrastructure (AMI) data into the core balancing procedures by July 1, 2019.¹ Intervenors do not

¹ SCG/SDG&E Opening Brief (OB) at 1-2.

contest SoCalGas and SDG&E's proposal nor do they dispute that there will be a reduction in forecast error once this AMI usage data is incorporated into the core balancing procedures.

Instead, intervenors contend that the existing core forecasting procedures increase the likelihood of operational flow orders (OFO) on the system and, based on that contention, craft their own alternative proposals on how the Gas Acquisition Department, another market participant, should be balancing its natural gas deliveries and usage. Intervenors' alternative proposals are unreasonable because they have not been shown to be any better than the current balancing procedure and seek to disadvantage core customers relative to noncore customers. It is the intervenors that must bear the burden of substantiating their own proposals and they have failed to meet their burden.

This reply brief focuses on contentions made by intervenors:

1. Intervenors seek to overturn the Commission's findings and orders in D.07-12-019 and modify the core balancing procedures, thus they must bear the burden of substantiating their own proposals.
2. Intervenors still have not provided any factual evidence that the existing core forecasting procedures cause an increase in the number of OFOs in contrast to their own proposals.
3. Intervenors' proposals to require the Gas Acquisition Department to balance to estimated actual usage on OFO days are inappropriate because they have not demonstrated that estimated actual usage better reflects core actual usage than the existing core forecast.
4. Intervenors overlook the fact that the Gas Acquisition Department must always rely on forecasts of its usage when scheduling deliveries in Scheduling Cycles 1 and 2 on the day before the Gas Day.
5. If the Commission authorizes intervenors' proposals to impose the requirement that core balancing agents must balance to actual usage, a measured approach must be taken to develop and implement such a system to mitigate disadvantaging core customers.

II. DISCUSSION

A. **Intervenors Seek To Overturn The Commission's Findings And Orders In D.07-12-019 And Modify The Core Balancing Procedures, Thus They Must Bear The Burden Of Substantiating Their Own Proposals**

In D.07-12-019, the Commission determined that SoCalGas and SDG&E core customers do not have access to real-time usage data and therefore must balance to a forecast.² This reality remains unchanged.³ Here, intervenors have proposed to modify existing core balancing procedures established in D.07-12-019. It is intervenors who must present evidence to carry the burden of their own proposals.

Intervenors' attempts to turn this proceeding on its head – and back again – are disingenuous and must not be entertained. Southern California Edison Company (SCE) contends that “SCG/SDG&E has not met it[s] burden to prove that the Commission should not require it to balance core gas deliveries to actuals, as opposed to balancing core gas deliveries to a forecast.”⁴ Aside from boxing SoCalGas and SDG&E into a corner by listing a series of negatives they must purportedly prove,⁵ SCE directly contradicts its own admission that “*SCE and SCGC/IS are substantively the applicant or petitioner in this proceeding on the issue about requiring the core to balance to actual usage determined by AMI data.*”⁶

SCE, SCGC, and IS have admitted that requiring core customers to balance to actual usage are their own proposals and that they should be treated as applicants for their own

² D.07-12-019 at 52-57; see SCG/SDG&E OB at 24.

³ SCG/SDG&E OB at 24.

⁴ SCE OB at 3.

⁵ SCE OB at 3.

⁶ See SCE and Southern California Generation Coalition (SCGC)/Indicated Shippers (IS) Request for an Opportunity to Respond to the August 10, 2016 Testimony of Messrs. Borkovich, Mercer, and Stewart, August 13, 2018; see also A.17-10-002, E-Mail Ruling Granting Limited Additional Testimony and Reply Testimony and Determining an Updated Schedule (August 20, 2018).

proposals.⁷ Indeed, SCE, SCGC, and IS proffered this admission as a basis for their motion to provide additional intervenor testimony to support their proposals. ALJ Stevens ostensibly relied upon these admissions in granting their motion.⁸ It would be inappropriate to allow SCE, or any other intervenor, to take these drastically inconsistent positions depending on what is more advantageous at a particular time. In this case, SCE and other intervenors should be treated as the applicant for their proposal to modify the procedures established in D.07-12-019 because that is what they asked for.

SCGC likewise appears to confuse its own intervenor proposal with SoCalGas' and SDG&E's proposal.⁹ It is undisputed that core customers still do not have access to real-time usage data as the Commission determined in D.07-12-019.¹⁰ Accordingly, SoCalGas and SDG&E in their application proposed to incorporate AMI usage data into the SoCalGas core balancing process by developing an AMI-informed forecast against which the Gas Acquisition Department would balance.¹¹ Conversely, intervenors seek to modify existing core balancing procedures to require core to balance to actual usage.¹² While the differences in these proposals are clear and distinct, SCGC splices multiple sentences out of context to compose the following mischaracterization:

SoCalGas proposes that if the Commission would permit “having core balancing agents balance to actual usage data in a relatively timely manner, e.g., in the latter hours of the day after usage,” specifically, by 9:00 p.m. on the day after the Gas Day in a new

⁷ See SCE and SCGC/IS Request for an Opportunity to Respond to the August 10, 2016 Testimony of Messrs. Borkovich, Mercer, and Stewart, August 13, 2018.

⁸ A.17-10-002, E-Mail Ruling Granting Limited Additional Testimony and Reply Testimony and Determining an Updated Schedule (August 20, 2018).

⁹ SCGC OB at 2, 17, 27.

¹⁰ SCG/SDG&E OB at 2, 24, 27.

¹¹ *Id.* at 1-4. AMI usage data has already been incorporated into the SDG&E core demand forecast. *Id.* at 7.

¹² SCE OB at 2; SCGC OB at 8; EDF OB at 2; IS OB at 2.

Intraday 4 Cycle (Cycle 6), “the Applicants believe it would be appropriate to determine the requirements for the AMI Data Aggregation System.”¹³

SoCalGas and SDG&E have not and do not request permission from the Commission to require that core balancing agents balance to actual usage data for the reasons explained in their testimony and opening brief. These reasons include that there is no factual evidence that the existing core balancing procedures cause OFOs or that requiring core balancing agents to balance to actual usage would cause a decrease in the frequency of OFOs.¹⁴ In addition, requiring core balancing agents to balance to actual usage data will disadvantage core customers relative to noncore customers, and costs for core customers will likely increase.¹⁵

SoCalGas and SDG&E did, however, offer supplemental testimony to respond to ALJ Stevens’ Ruling Question 7 in an effort to provide relevant information relating to costs and development for an AMI Data Aggregation system that would be necessary to accomplish what the intervenors are proposing.¹⁶ SCGC cannot be allowed to twist this supplemental testimony into a “proposal” that SoCalGas and SDG&E “proposed for the first time in this proceeding in the Applicants’ last round of testimony” because this has never been SoCalGas’ and SDG&E’s proposal in this proceeding.¹⁷

SCGC also mischaracterizes SoCalGas and SDG&E supplemental testimony as “acceding” to intervenors’ proposals that the Gas Acquisition Department should be required to balance to actual usage.¹⁸ Intervenors must not be allowed to bootstrap SoCalGas and SDG&E’s

¹³ SCGC OB at 27.

¹⁴ SCG/SDG&E OB at 10-16, 23-28.

¹⁵ SCG/SDG&E OB at 23-28.

¹⁶ Exhibit (Ex.) SCG/SDGE-9, Supplemental Testimony of Paul Borkovich, Sharim Chaudhury, and David Mercer at 8-11.

¹⁷ SCGC OB at 2.

¹⁸ *Id.* at 2, 17.

supplemental testimony to absolve intervenors' burden to substantiate that their own proposals requiring core balancing agents to balance to actual usage are reasonable and necessary in the first place. SoCalGas and SDG&E have provided evidence through testimony as outlined in their pleadings that intervenors fail to make this showing.

B. Intervenor Still Have Not Provided Any Factual Evidence That The Existing Core Forecasting Procedures Cause An Increase In The Number Of OFOs In Contrast To Their Own Proposals

SCE and IS contend that “[a]s a result, large forecast errors made by the largest customer on the gas system will cause the Gas System Operator to extend OFOs across multiple days.”¹⁹ SoCalGas and SDG&E explain in their opening brief that there is no factual evidence that the current core balancing procedures increase the likelihood of OFOs.²⁰ The System Operator relies on the aggregate behavior of all shippers in Scheduling Cycles 1 and 2 on the day before the Gas Day (day-ahead gas market), compared against the System Operator’s sendout forecast, to determine whether an OFO event should be triggered.²¹ The core demand forecast, which the Gas Acquisition Department must balance against, is provided at 7:00 a.m. on the morning of the Gas Day, approximately 11 hours after the time an OFO must be called for the Gas Day.²² Furthermore, this OFO assessment occurs on the day before each Gas Day.²³ SCE and IS provide no support for their conjecture that OFOs are predetermined for an extended period of days or an OFO declaration on one day causes OFO declarations on subsequent days.

IS instead chooses to promulgate a clear mischaracterization of OFO causation by asserting that “a large number of both Low and High OFOs are declared in the third

¹⁹ SCE OB at 16; *see* IS OB at 18.

²⁰ SCG/SDG&E OB at 10-16.

²¹ *Id.* at 12-13.

²² *Id.* at 11-12.

²³ *Id.* at 12-13.

cycle...rather than in one of the first two cycles...” and that the “System Operator regularly declares OFOs in the later cycles.”²⁴ In support, IS reproduces, from its own joint testimony with SCGC, a comparison of OFO timing for periods in 2017 and 2018 from the SoCalGas 2018 Customer Forum Report that shows low and high OFOs declarations from Cycle 1 through Cycle 4.²⁵

The problem is not that the data is inaccurate, but rather what IS says this data shows. In actuality, SCGC/IS’ cited testimony and tables regarding later cycle OFOs show historical OFO timings before the current high OFO procedures, which require that OFO declarations must be made by 8:00 p.m. the day before the Gas Day in order to be binding.²⁶ In addition, while SoCalGas’ tariffs show that Cycle 3 (Intraday 1 Cycle) opens at 4:00 p.m. the day before the Gas Day and runs through 8:00 a.m. the morning of the Gas Day, any OFOs declared during Cycle 3 must still be called by 8:00 p.m. the day before the Gas Day under current rules.²⁷

IS’ proffer stale data of historical OFO timings when previous OFO procedures were in place to assert that these late cycle OFO declarations will continue is highly misleading because current OFO procedures require an OFO to be declared by 8:00 p.m. the day before the Gas Day.²⁸ IS’ argument must be completely disregarded because the cited testimony does not reflect current system reality and mischaracterizes Cycle 3.

This is also true of IS’ disingenuous complaint that SoCalGas and SDG&E are reluctant to “share information that would help the Commission develop and understanding of the

²⁴ IS OB at 16 and 17.

²⁵ *Id.* at 16 and 17.

²⁶ SCG/SDG&E OB at 10-16.

²⁷ SoCalGas Rule No. 30, Sheet 8-9.

²⁸ SCG/SDG&E OB at 10-16.

deviation between retail core forecast and its actual deliveries.”²⁹ SoCalGas and SDG&E do, in fact, provide confidential monthly reports to the Commission’s Energy Division that contain confidential, non-public, and market-sensitive data for the Gas Acquisition Department.³⁰ Any intervenor contentions that the Gas Acquisition Department’s confidential, non-public, market-sensitive data should be made available to other market participants in a competitive gas market are nonsensical.

C. Intervenors’ Proposals To Require The Gas Acquisition Department To Balance To Estimated Actual Usage On OFO Days Are Inappropriate Because They Have Not Demonstrated That Estimated Actual Usage Better Reflects Core Actual Usage Than The Existing Core Forecast

Intervenors’ various proposals to require the Gas Acquisition Department to balance to what intervenors portend to be estimated actual usage are inappropriate.³¹ This is because what the intervenors appear to describe as estimated actual usage is only an initial estimated actual usage, which is continually refined and improved for 40 days after the Gas Day.³² While intervenors use the terms estimated actual usage, estimated actuals, estimates of actual usage, or “operating actuals”³³ in different instances with potentially different meanings, SoCalGas and SDG&E have defined estimated actual core usage in this proceeding as an estimate of actual usage that is residually derived by subtracting the measured daily gas demand of noncore

²⁹ IS OB at 4.

³⁰ D.16-12-005, subsequently extended by D.18-11-009, provides that “[d]uring the Settlement Term [of the Second Daily Balancing Settlement], SoCalGas and SDG&E shall provide a monthly report to the Commission’s Energy Division that compares, for each Measurement Day covered by the report, the 7:00 a.m. Demand Forecasting Group core load forecast to estimated actual core usage for the Measurement Day and calculates a percent deviation of each of the demand forecasts relative to estimated actual core usage.” D.16-12-005 at Ordering Paragraph (OP) 11.

³¹ SCE OB at 5-6; SCGC OB at 2; IS OB at 2.

³² Ex. SCE-03 at Response to Question 2.a. Citations to SCE-03 herein are made subject to SCE’s Motion to Enter Exhibits into the Evidentiary Record, January 29, 2019.

³³ SCE OB at 6.

customers and the estimated daily gas demand of Core Aggregation Transportation (CAT) customers from the measured daily total system gas sendout.³⁴

Estimated actual usage (available the day after the Gas Day) initially contains measurement error that diminishes over a period of approximately 40 days. The process in which the SoCalGas and SDG&E-provided estimated actual usage is refined over time is described below:

The Demand Forecasting Group typically receives [estimated actual usage] data at approximately 2:00 pm in the afternoon on the day following the Measurement Day (midnight to midnight Pacific Standard Time)....

The aggregated measured daily noncore gas demand initially received typically contains measurement error. This error is transferred into the initial estimate of the daily retail core estimated actual gas demand, which also includes estimates of LUAF (which is not measurable) and Company-use gas. SoCalGas has observed that the error in the aggregated measured noncore daily gas demand diminishes in subsequent days as individual noncore measured data are re-evaluated. The error in the aggregated measured noncore daily gas demand is addressed over 40 subsequent days, during which the quality of the residually-derived retail core estimated actual gas demand improves. Using inaccurate initial estimates as indications of compliance with daily OFO and EFO balancing requirements would be inappropriate. It would also be inappropriate to require Gas Acquisition to measure compliance using 40 day later improved estimates with no opportunity to cure imbalances.³⁵

Intervenor proposals appear to require the Gas Acquisition Department to balance to an initial estimated actual usage number determined on the day after the Gas Day even though that number will be improved daily for a period of up to 40 days before it is finalized, at which time

³⁴ SCG/SDGE OB at 18-19. This is the estimated actual usage information provided to the Commission's Energy Division in the Gas Acquisition Department's monthly reports. See D.16-12-005 at OP 11.

³⁵ Ex. SCE-03 at Response to Question 2.a.

there will be no opportunity for the Gas Acquisition Department to balance against more accurate daily OFO imbalances.³⁶

Moreover, estimated actual usage may be useful for general discussion of the issues addressed in this proceeding, but it should not be used to evaluate forecast performance on any given day.³⁷ Estimated actual usage is not actual usage.³⁸ Intervenors would have the Gas Acquisition Department balance against an initial estimated actual usage number that intervenors acknowledge is not actual usage, has not been shown to be any better than the existing forecasts or the improved forecasts once AMI usage data is incorporated, and which should not be used to evaluate forecast performance for a particular day – let alone to be balanced against for OFO purposes. Therefore, it is inappropriate to require the Gas Acquisition Department to measure daily OFO compliance against estimated actual usage.

Any claims that balancing to an initial estimated actual usage number would result in parity with noncore customers are built on a false premise that neglects the fundamental differences between core and noncore customers. These significant technical differences described in SoCalGas and SDG&E's opening brief include the fact that noncore customers can have access to real-time usage data and that some noncore customers can more accurately forecast or influence their gas usage, while the Gas Acquisition Department cannot.³⁹

IS' claim that "estimated actual burn information is available to Gas Acquisition by 5:00 a.m. – the same time noncore customers receive their recorded burn data from SoCalGas" is also not accurate.⁴⁰ IS attempts to support this claim by citing its own joint testimony that:

³⁶ Ex. SCE-03 at Response to Question 2.a.

³⁷ SCG/SDG&E OB at 19.

³⁸ SCG/SDG&E OB at 19.

³⁹ SCG/SDG&E OB at 26-28.

⁴⁰ IS OB at 13.

“[f]urthermore, by 5:00 a.m., SoCalGas’ existing AMI system provides the previous Measurement Day’s metering data for a random sample of 40 percent of core customers, which would allow Gas Acquisition to know its previous day imbalance and enable it to participate in trading scheduled quantities on OFO days.”⁴¹ This citation offers no support for IS’ contention because “[m]etering data for a random sample of 40 percent of core customers” clearly is not estimated actual usage as that term is defined by SoCalGas and SDG&E. IS conflates a fraction of AMI usage data received after the Measurement Day with estimated actual usage, which is residually derived and takes up to 40 days after the Gas Day to refine as explained above.⁴²

Accordingly, conclusory statements that the Gas Acquisition Department “has tools necessary to balance to estimated actual burn today”⁴³ and that “[b]alancing to estimated actual data makes use of existing procedures and data that are readily available”⁴⁴ are inaccurate and misinformed. Moreover, as discussed herein, no intervenor has shown that requiring the Gas Acquisition Department to balance to what the intervenors purport to be estimated actual usage would reduce the frequency of OFOs, nor has any intervenor shown how balancing to this estimated value would be any more appropriate than another estimated value such as a core demand forecast that incorporates AMI usage data.

D. Intervenors Overlook The Fact That The Gas Acquisition Department Must Always Rely On Forecasts Of Its Usage When Scheduling Deliveries In Scheduling Cycles 1 And 2 On The Day Before The Gas Day

Requiring core balancing agents to balance to actual demand during OFO events is not likely to affect day-ahead scheduling activity because core balancing agents by default must act

⁴¹ Ex. SCGC/IS-1 at 51.

⁴² *See Id.*

⁴³ IS OB at 18.

⁴⁴ SCE OB at 11.

on some sort of forecast in the day ahead market.⁴⁵ Under current core balancing procedures, SoCalGas' Demand Forecasting Group provides the forecast against which the Gas Acquisition Department must balance at 7:00 a.m. in the morning of the Gas Day.⁴⁶ Under intervenors' alternative proposals to have core balancing agents balance to actual usage, the actual usage number will not be available until sometime after the Measurement Day.⁴⁷

Moreover, the System Operator determines whether it is necessary to call an OFO based on activity in the day ahead market relative to its forecast of system sendout for the Gas Day.⁴⁸ Intervenors may contest the quality of a forecast, but it is undisputed that the Gas Acquisition Department must use some sort of forecast of usage to inform its day-ahead gas market activity, and it is aggregate system day-ahead market activity that the System Operator uses to determine if an OFO is required for the next Gas Day.⁴⁹ Regardless of what intervenors claim about the need for the Gas Acquisition Department to balance to actual usage, requiring the Gas Acquisition Department to balance to an unknown actual usage would not change these circumstances when determining OFOs.

E. If The Commission Authorizes Intervenors' Proposals To Impose The Requirement That Core Balancing Agents Must Balance To Actual Usage, A Measured Approach Must Be Taken To Develop And Implement Such A System To Mitigate Disadvantaging Core Customers

Notwithstanding, if the Commission authorizes intervenors' proposals to require that core balancing agents balance to actual usage, SoCalGas and SDG&E have raised their concerns relating to the disparate proposals from intervenors relative to a system that would be necessary

⁴⁵ SCG/SDG&E OB at 26.

⁴⁶ *Id.* at 23.

⁴⁷ *Id.* at 23-24.

⁴⁸ *Id.* at 26.

⁴⁹ *Id.*

to provide timely AMI usage data aggregated to core balancing agents for the calculation of OFO noncompliance charges.⁵⁰ The system to support this requirement should be developed in a comprehensive process to account for how such a system would function in the context of existing SoCalGas and SDG&E systems, including how these existing systems would also need to be modified.⁵¹ All costs related to implementing intervenors' proposals to require modifications to the core balancing procedures should be recorded to an appropriate memorandum account.⁵²

Thus, the Commission should reject intervenor proposals to impose predetermined timelines or cost limits on an AMI Data Aggregation System project that has not been fully scoped, for which technical requirements have not been fully developed, for which detailed cost estimates have not been obtained, and that will require potential modifications to other SoCalGas and SDG&E systems.⁵³ While SoCalGas and SDG&E have described the "likely requirements for such a system,"⁵⁴ no such AMI Data Aggregation System project has been fully scoped nor has a detailed cost estimate been developed for such a project.⁵⁵ SoCalGas and SDG&E have preliminarily estimated the implementation cost for such an AMI Data Aggregation System is "up to \$7 million and that the project [could] take up to 18 months to complete."⁵⁶ This \$7 million does not include costs to move the Cycle 6 scheduling deadline and to create a new

⁵⁰ *See Id.* at 23-33.

⁵¹ Ex. SCG/SDGE-9 at 9; *see also* Ex. SCGC/IS-3, Responsive Testimony of Catherine E. Yap on Behalf of the Southern California Generation Coalition and Indicated Shippers, Appendix A at 20 (SoCalGas and SDG&E Response to Data Request 10 from IS/SCGC, Question 10.16).

⁵² Ex. SCG/SDGE-9 at 11.

⁵³ SCGC OB at 16-18.

⁵⁴ Ex. SCG/SDGE-9 at 9.

⁵⁵ *Id.* at 11.

⁵⁶ *Id.*

scheduling Cycle 7 or additional costs to other SoCalGas and SDG&E systems that may need to be modified to accommodate an AMI Data Aggregation System.⁵⁷

Moreover, intervenor proposals to require the core to modify its balancing rules before any potential AMI Data Aggregation System is implemented lack evidentiary support that these untimely modifications would improve the current forecast procedure. Such proposals also run counter to intervenors' arguments for core parity with noncore customers who can have access to real-time usage information.⁵⁸ In addition, these temporary modifications to core balancing procedures would divert time and resources that could otherwise be focused on developing an AMI Data Aggregation System and modifying other SoCalGas and SDG&E systems. These alternative temporary modifications thus conflict with intervenors' assertions that their proposal to require core balancing agents to balance to actual usage is necessary now.⁵⁹

Another important consideration if the intervenors' proposals to modify core balancing procedures by requiring core balancing agents balance to actual usage are entertained, is that any modifications would apply to all core balancing agents – not only the Gas Acquisition Department.⁶⁰ The testimony offered throughout this proceeding and opening briefs consistently address core balancing agents including a potential AMI Data Aggregation System necessary to implement the intervenors' proposals to require core balancing agents to balance to actual usage.⁶¹

⁵⁷ Ex. SCG/SDGE-5, Rebuttal Testimony of Paul Borkovich, at 19-20; Ex. SCG/SDGE-9 at 11; *see also* SCGC OB at 35; Ex. SCGC/IS-3, Responsive Testimony of Catherine E. Yap on Behalf of the Southern California Generation Coalition and Indicated Shippers, Appendix A at 20 (SoCalGas and SDG&E Response to Data Request 10 from IS/SCGC, Question 10.16).

⁵⁸ *See e.g.*, SCE OB at 20.

⁵⁹ *See e.g.*, IS OB at 11.

⁶⁰ Ex. SCG/SDGE-5 at 19; Ex. SCG/SDGE-9 at 8-11.


⁶¹ Ex. SCG/SDGE-5 at 19; *see* SCGC OB at 14,15, 16, 17, 29, 30; IS OB at 21; SCE OB at 9.

III. CONCLUSION

SoCalGas and SDG&E respectfully request that the Commission issue a decision approving their proposal set forth in the application consistent with their testimony and pleadings.

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Dated: February 6, 2019