

From: Malinda Dickenson  
Sent: Thursday, August 13, 2020 11:02 AM  
Subject: Fwd: I.17-02-002 webinar, summary of Protect Our Communities Foundation follow-up questions  
To: I.17-02-002 Service List

Pursuant to the August 4, 2020 email from AlisoCanyonOII to the service list in I.17-02-002, please find the below comments and questions from Bill Powers on behalf of The Protect Our Communities Foundation following the July 28 workshop.

Malinda Dickenson, General Counsel

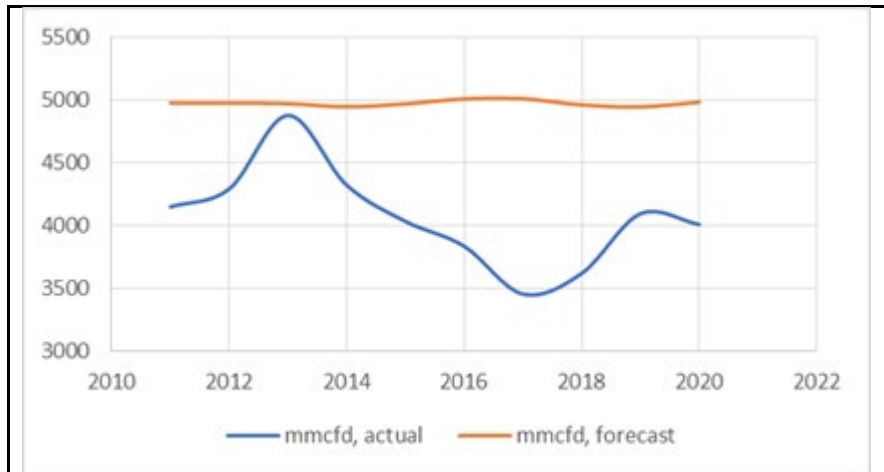
The Protect Our Communities Foundation

San Diego, CA 92116

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From: Bill Powers  
Date: Tue, Jul 28, 2020 at 4:34 PM  
Subject: I.17-02-002 webinar, summary of Protect Our Communities Foundation follow-up questions  
To: [alisocanyonoi@cpuc.ca.gov](mailto:alisocanyonoi@cpuc.ca.gov)  
Cc: Christina Ly; Malinda Dickenson

Thank you for taking my questions for Dr. Abdelaziz during the webinar this afternoon. My follow-up questions relate to observations in my I.17-02-002 March 24, 2020 opening comments and March 30, 2020 reply comments on the Commission's hydraulic modeling exercise. The historic data indicate the SoCalGas winter peak has not exceeded 4,100 mmcf/d since the Aliso Canyon blow-out in October 2015, as shown in the figure below from my opening comments (Figure 3, p. 11):



**Question 1:** Has the Commission evaluated the actual core, EG, and non-EG demand on these peak winter days in 2015-2020 to assess the actual demand patterns between these principal gas demand categories? If not, can the Commission provide this information to the parties to I.17-02-002 so they can independently assess these patterns? Of particular interest is the actual core and EG demand on these peak winter days, compared to the modeled projections of core and EG demand at 1-in-10 year conditions.

**Question 2:** The Commission is using the last 10 years of actual demand data in its regression analyses to verify its modeling. There are no temperatures below 44 oF in this 10-year record. Why is 42.3 oF continuing to be used to represent a the 1-in-10 year event and not 44 oF?

**Question 3:** Is the Commission using raw reported Sempra Envoy send-out volumes in its regression analyses to support its hydraulic modeling? The Sempra Envoy data is often inaccurate and high on peak days based on my analysis.

**Question 4:** I analyze the one actual core data point that exceeds 2,400 mmcf/d in the 10-year record used in the regression analysis to model core load. This data point appears to be erroneous, as it is 300 mmcf/d higher than any other data point in the database. The reasons this data point – and several other winter peak demand day send-out volumes addressed in my reply comments (Table 1, p. 2) – appears erroneous is explained in detail in my March 30, 2020 reply comments (attached). Can the Commission verify this outlier data point is: 1) accurate or 2) erroneous.

**Question 5:** Assuming the data point in Question 4 is erroneous and when corrected is no greater than 2,400 mmcf/d, there is no core demand in the last 10 years that exceeds 2,400 mmcf/d. The limited data seems to indicate that once the ambient temperature reaches 47 oF, the core demand flat-lines at about 2,400 mmcf/d or less even as the ambient temperature drops to 44 oF (lowest in 10-year record). The Commission is currently assuming that core demand at the 1-in-10 year will be ~2,600 mmcf/d (42.3 oF), and ~2,850 mmcf/d at the 1-in-35 year (40 oF). Has the Commission considered the possibility that the maximum core demand at any temperature at or below 47 oF is ~2,400 mmcf/d, that the physical limitation of the space heaters serving SoCalGas core load is ~2,400 mmcf/d?

Best regards,

Bill Powers, P.E. [consultant to Protect Our Communities Foundation]

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