

**POCF DATA REQUEST**  
**POCF-SDG&E-DR-01**  
**SDG&E TRACK 4- LTPP – R.12-03-014**  
**SDG&E PARTIAL RESPONSE**  
**DATE RECEIVED: SEPTEMBER 09, 2013**  
**DATE RESPONDED: SEPTEMBER 13, 2013**

1. Please provide copies of all materials SDG&E has provided in response to other parties' data requests in Track 4 R.12-03-014. For purposes of this data request, consider the CPUC's energy division a party. Consider this an ongoing data request and provide additional materials as SDG&E responds to other parties' additional data requests.

**SDG&E Response:**

This is SDG&E's first data response in Track 4 R.12-03-014. SDG&E will treat this as an ongoing data request and will provide additional materials as SDG&E responds to other parties' data requests.

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2. Please provide all workpapers used by SDG&E to support its LTPP Track 4 testimony. Consider this an ongoing data request and provide additional materials as SDG&E produces additional workpapers.

**SDG&E Response:**

Please see the attached public Excel files of John Jontry and Rob Anderson.



Summary\_LTPP\_trk4  
\_AllAIts.xlsx



Summary\_SCRS\_v03  
\_by\_SCE-SDGE\_02\_Info



Local renewables est  
for Tenthredinids.xlsx

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3. Please provide the factual basis for SDG&E’s assumption that “all 964 MW of dependable capacity at the Encina power plant would be retired, including the 14 MW combustion turbine at the site that does not use OTC.” (Anderson Opening Testimony, at p. 8).

**SDG&E Response:**

SDG&E’s assumption regarding retirement of the Encina power plant is based on NRG Energy’s letter dated January 30, 2013 to the State Water Resources Board updating its OTC compliance plan. In addition, since the Encina power plant is currently over 50 years old, it is reasonable to assume that the entire facility will be retired.



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5. SDG&E's June 9, 2009 Request for Offers for Demand Response and Supply Resources states: "In consideration of California State Once through Cooling (OTC) goals and pending Water Board rules, any Offer for supply from a unit utilizing OTC will be offered a contract with SDG&E that consists of a 2 year transaction with the possibility to extend for eight – 1 year options. OTC offers shall not include proposals for upgrades or retrofits of OTC facilities." Regarding this testimony:
- a. Please confirm that the above-quoted OTC terms currently apply to the Encina plant.
  - b. Please describe any modifications that have been made to the above-quoted OTC terms as they apply to Encina.
  - c. Please justify SDG&E's decision to refuse OTC offers that include costs associated with upgrading or retrofitting OTC facilities.
  - d. Please provide any studies or analyses conducted by SDG&E projecting the cost of purchasing power from Encina if OTC retrofit or upgrade costs are included.
  - e. Please identify any other instances where SDG&E has refused to consider offers that include government-mandated compliance costs.

**SDG&E Response:**

SDG&E objects to this question on the grounds that it is vague, overbroad and not reasonably calculated to lead to the discovery of information relevant to this proceeding. Without waiving these objections and subject thereto, SDG&E responds as follows:

- a. The time for submitting bids to SDG&E's June 6, 2009 RFO has expired, so the terms of the June 6, 2009 RFO no longer apply.
- b. See response to 5.a.
- c. There was substantial concern for costs ratepayer may bear regarding plants subject to OTC regulations. See letter from the CPUC to SDG&E, dated May 14, 2009 (PROTECTED MATERIAL).
- d. SDG&E does not have any such studies or analysis.
- e. Most, if not all, generators include costs related to compliance with government mandates in the pricing for their generation resources. Hence, it is reasonable to assume that all offers include some government-mandated compliance costs.

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6. Please provide a cost analysis for the purchase of power from Encina under the following scenarios, covering the years 2015-2022. Assume that OTC compliance costs are included in the cost to SDG&E:
- a. Encina’s OTC compliance deadline is extended past 2022 and no modifications or upgrades are made to the plant.
  - b. Encina implements all aspects of its OTC Implementation Plan.
  - c. Encina implements its plan for Track 1 Compliance for Units 1-3.
  - d. Encina implements its plan for Track 2 Compliance for Units 4 and 5.

**SDG&E Response:**

SDG&E does not own the Encina power plant and does not know what the costs would be for the owners of the Encina power plant to continue to operate the existing units for the 2015-2022 time period under the scenarios identified above, or to fulfill its OTC compliance obligations, or what charges the owners would seek to impose on SDG&E's ratepayers.??????

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7. In reference to SDG&E's June, 2013 Resource Update for SANDAG EWG, presented by Robb Anderson:
- a. Please provide the documentation forming the basis for SDG&E's statement that there are "more than 21,000 rooftop solar installations in San Diego, highest per capita rate in country." (Slide 4)
  - b. Please provide the documentation forming the basis for SDG&E's statement that San Diego's Solar Rooftops "Produce more than 160 MW of clean electricity." (Slide 4).
  - c. Please provide the documentation forming the basis for SDG&E's projection that 600 MW of Solar Distributed Generation will be installed in San Diego by 2020. (Slides 7-8).
  - d. Please reconcile SDG&E's 600 MW installed rooftop solar projection from Mr. Anderson's SANDAG Presentation with the 351 MW installed rooftop solar projection presented at pp. 6-7 of Mr. Anderson's opening testimony in this proceeding.

**SDG&E Response:**

- a. The 21,000 was rounding the number of net energy meeting installations in SDG&E service area at the end of February, 2013. An update report that shows the values through July, 2013 is attached. See "NEM July 2013.xls.
- b. The 160 MW was the installed net energy meter capacity associated with the 21,000 installations. See file provide in response to a.
- c. The data used for this slide was theoretical in nature and used to illustrate directional movements and how the needs of the grid will change over time. The key point being that the need for resources will be driven by evening peaks, when solar is not available.
- d. SDG&E believes the values used in this case are reasonable values for planning for system reliability.

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8. Please provide the factual basis for SDG&E's assumption that the 188 MW Cabrillo II units will be retired. (Anderson Opening Testimony, at p. 8).

**SDG&E Response:**

The SDG&E study examined need in 2022. Since these units would be over 60 years old in 2022, it was assumed that they would be retired. SDG&E does not believe that prudent resource planning allows the assumption that very old, inefficient (heat rates of 16,000 btu/kwhr), and highly polluting (no selective catalytic reduction equipment for NOx reduction) generating sources will be available indefinitely.



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9. Robert Anderson's Opening Testimony states that "SDG&E assumes that 88 MW of local CHP units will be retired. These resources are made up of three units that are located on military bases in San Diego. The Navy has indicated that it does not plan to renew these contracts when they expire in 2019." Please describe how the Navy has "indicated" that it does not plan to renew the CHP contracts. Please identify who at the Navy has provided SDG&E with this indication. Please provide correspondence or other official documents in SDG&E's possession that provide factual support for this assertion.

**SDG&E Response:**

Response will be forthcoming.

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10. Please provide the definition of San Diego Local Area used by SDG&E in its LTPP Track 4 Opening Testimony. Please provide a specific geographic description of the Local Area, a description of all generation assets included in the San Diego Local Area, and a list of all transmission lines going into the San Diego Local Area.

**SDG&E Response:**

SDG&E defines the Greater Imperial Valley-San Diego LCR area and San Diego Sub-Areas in a manner identical to the CAISO's most recent long-term LCR analysis. See the CAISO Final 2018 Long-Term Local Capacity Technical Study report, pp. 89-97.<sup>1</sup>

The geographical area defined by the San Diego sub-area encompasses all of San Diego county and the portion of southern Orange County served by SDG&E (generally the San Clemente, Laguna Niguel, San Juan Capistrano, and Rancho Mission Viejo areas).

The following transmission lines delineate the San Diego Sub-Area "cut plane":

- 1) Path 44
  - a. San Onofre-San Luis Rey 230 kV #1
  - b. San Onofre-San Luis Rey 230 kV #2
  - c. San Onofre-San Luis Rey 230 kV #3
  - d. San Onofre-SONGS Mesa 230 kV #1
  - e. San Onofre-SONGS Mesa 230 kV #2
- 2) ECO-Miguel 500 kV #1
- 3) Ocotillo Express-Suncrest 500 kV #1
- 4) Tijuana-Otay Mesa 230 kV #1

See the below for a list of the generation assets assumed in the load flow 'base case' for the San Diego Sub-Area. This list excludes (i) generation described as "Theoretical" in Mr. Jontry's testimony; and (ii) approximately 150 MW of small generators (including Qualifying Facilities).

- 1) Combined-Cycle Base Load Generation
  - a) Otay Mesa
  - b) Palomar Energy Center
- 2) Gas-Fired Peakers
  - a) Calpeak - Border
  - b) Cuayamaca
  - c) Calpeak - Enterprise
  - d) Wellhead - Escondido
  - e) Larkspur #1

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<sup>1</sup> [http://www.caiso.com/Documents/Final2018Long-termLocalCapacityTechnicalStudyReportApr30\\_2013.pdf](http://www.caiso.com/Documents/Final2018Long-termLocalCapacityTechnicalStudyReportApr30_2013.pdf)

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**Response to Question 10 (Continued)**

- f) Larkspur #2
- g) Miramar Energy Facility #1
- h) Miramar Energy Facility #2
- i) Wellhead - El Cajon
- j) Orange Grove 1
- k) Orange Grove 2
- l) Wellhead Chula Vista
- m) Pio Pico
- 3) Pumped Storage
  - a) Lake Hodges
- 4) Renewables
  - a) Kumeyaay Wind

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11. In SDG&E's Opening Testimony, Robert Anderson states: "Because [SDG&E and SCE's studies projecting LCR need for 2022] were initiated prior to the creation of Track 4, certain of the assumptions SDG&E used in its transmission studies for loads and resources are similar but not identical to those that the Commission requested the CAISO use in its Track 4 studies." (at p. 2). Please provide a comprehensive list identifying all differences between the assumptions used in the SDG&E study and the assumptions set forth in Attachment A to the May 21, 2013 Revised Scoping Ruling and Memo of the Assigned Commissioner and Administrative Law Judge in this proceeding.

**SDG&E Response:**

SDG&E has not created a document that compares the two. SDG&E testimony states the values SDG&E used in its analysis and the basis for those assumptions.

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12. Please indicate whether the San Onofre Nuclear Generating Station is or has ever been part of the San Diego Local Area for LCR purposes.

**SDG&E Response:**

SONGS did not directly provide capacity to meet local resource adequacy requirements. However, SONGS did impact SDG&E's ability to import power in the local area. The loss of SONGS import capability will increase the need for local power plants, all else being the same.

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13. Please list the specific ways the Shutdown at San Onofre affects the San Diego Local Area's Local Capacity Requirement.

**SDG&E Response:**

See response to Question 12.

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14. Please reconcile SDG&E's LCR need projection 620 MW to 1470 MW (in addition to 300 MW from the unapproved Pio Pico generating station) presented in the Jontry Opening Testimony with the Commission's determination in D.13-03-029 that San Diego will have an LCR need in 2021 ranging from -87 MW (surplus) to 343 MW. (Finding of Fact 10, at p. 23). To the extent that the inputs, assumptions, and results of SDG&E's LTPP Track 4 study differ from the inputs, assumptions, and results of the OTC study adopted by the Commission in D.13-03-029, please explain how the changed inputs, assumptions, and results are related to the SONGS closure.

**SDG&E Response:**

SDG&E has not developed such a comparison. The major difference is that the previous LCR need finding assumed that SONGS would be operational. The more recent LCR need finding assumes that SONGS is not operational.