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

Application of Pacific Gas and Electric
Company Proposing Cost of Service and
Rates for Gas Transmission and Storage
Services for the Period 2015 - 2017 (U39G)

Application 13-12-012
(Filed December 19, 2013)

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**Direct Testimony of Catherine E. Yap
On Behalf of
California Manufacturers & Technology Association
Southern California Generation Coalition
Kern River Gas Transmission Company
Questar Southern Trails Company**

August 11, 2014

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1 **Direct Testimony of Catherine E. Yap**
2 **On Behalf of**
3 **California Manufacturers & Technology Association**
4 **Southern California Generation Coalition**
5 **Kern River Gas Transmission Company**
6 **Questar Southern Trails Company**

7 **1. Introduction**

8 This testimony is presented by Catherine E. Yap on behalf of the California
9 Manufacturers & Technology Association (“CMTA”), the Southern California Generation
10 Coalition (“SCGC”), Kern River Gas Transmission Company (“Kern River”), and Questar
11 Southern Trails Company (“Questar”). CMTA represents the interests of California's 40,000
12 manufacturing, processing and technology based companies, many of whom purchase natural gas
13 in the Pacific Gas and Electric Company (“PG&E”) citygate market. SCGC members are
14 electricity generators that transport gas on PG&E’s backbone transmission system. Kern River
15 and Questar are interstate pipelines that deliver natural gas into PG&E’s Baja Path (Line 300).
16 Ms. Yap has over 30 years’ experience testifying before this Commission and other jurisdictions.
17 Ms. Yap’s qualifications are set forth in Attachment A.

18 On December 19, 2013, PG&E filed Application 13-12-012 regarding its gas transmission
19 and storage (“GT&S”) revenue requirement, cost allocation, and rate design. In its application,
20 PG&E proposes to equalize the Redwood and Baja path rates for both core and noncore
21 customers.

22 On April 17, 2014, the Assigned Commissioner’s and Administrative Law Judge’s
23 Scoping Memo and Ruling (“Scoping Memo”) established the scope of the proceeding and listed
24 numerous issues related to the evaluation of PG&E’s proposals regarding revenue requirement,
25 cost allocation, and rate design. The Scoping Memo asks whether PG&E’s proposal to equalize
26 the rates of the Redwood and Baja paths for core and noncore customers should be adopted.
27 Scoping Memo at 4. This testimony responds directly to the Commission’s inquiry by addressing
28 PG&E’s testimony and supporting documents.

1 **2. Summary of Recommendations**

2 The Commission should adopt PG&E’s proposal to equalize the Redwood and Baja path
3 rates for both core and noncore customers.

4 **3. Background for PG&E’s Proposal to Equalize Path Rates**

5 In D.97-08-055, the Commission adopted the original Gas Accord settlement to unbundle
6 PG&E’s backbone transmission revenue requirement and create rates for backbone transmission
7 service. The settlement established rates for four backbone transmission paths: Redwood (Lines
8 400 and 401), Baja (Line 300), Silverado (California Gas), and Mission (On-System Storage).
9 D.97-08-055, slip op. at 18, Appendix B at 4. The Redwood path rate for core customers was
10 based entirely on the cost of Line 400, while the Redwood path rate for noncore customers was
11 based on a mixture of Line 400 and 401 costs. *Id.* at 16, Appendix B at 37.

12 The Gas Accord structure has continued through four subsequent periods (Gas Accord II
13 through Gas Accord V) with limited modifications. As discussed below, in the last two Gas
14 Accord settlements, Redwood and Baja path rates were established for core and noncore
15 customers at levels that were fairly close to an equalized rate. PG&E GT&S Rate Case Prepared
16 Testimony (“PG&E Testimony”) at 10-20 to 10-21.

17 In this proceeding, PG&E proposes to combine the core’s share of the Redwood path
18 revenue requirement with the core’s share of the Baja path revenue requirement into a single core
19 Redwood/Baja revenue requirement. *Id.* at 10-20, 17-3. PG&E calculates core rates that recover
20 the single core Redwood/Baja revenue requirement plus allocated common costs. PG&E GT&S
21 cost allocation workpapers: *Backbone Rate Model.xlsx*. Separate rates are designed for firm SFV,
22 firm MFV, firm seasonal, and as-available Redwood/Baja service to core customers. For a given
23 type of service, the same core rate would apply to transportation on either the Redwood path or
24 the Baja path. *Id.* The core’s share of the Redwood path revenue requirement does not contain
25 any share of the revenue requirement associated with Line 401. Therefore, PG&E’s proposed
26 equalization of core backbone rates does not violate the Commission’s prohibition against rolling
27 the cost of Line 401 into core rates. D.03-12-061, slip op. at 285.

1 Similarly, PG&E proposes to combine the noncore's share of the Redwood path revenue
2 requirement with the noncore's share of the Baja path revenue requirement into a single noncore
3 Redwood/Baja revenue requirement. PG&E Testimony at 10-20, 17-3. Noncore rates are
4 designed to recover the single noncore Redwood/Baja revenue requirement plus allocated
5 common costs. PG&E GT&S cost allocation workpapers: *Backbone Rate Model.xlsx*. Separate
6 rates are designed for firm SFV, firm MFV, firm seasonal, and as-available Redwood/Baja
7 service to noncore customers. For a given type of service, the same noncore rate would apply to
8 transportation on either the Redwood path or the Baja path. *Id.*

9
10 **4. PG&E's Proposal to Equalize Redwood/Baja Rates Benefits End-Users by Reducing
11 Gas Prices in PG&E's Citygate Market from What They Would Be If Rates Were
12 Path-Differentiated.**

13 I recommend that the Commission adopt PG&E's proposal to equalize Redwood and Baja
14 rates. Gas delivered across the Baja path is the marginal supply source for the PG&E system.
15 Consequently, the PG&E citygate price reflects the incremental cost of transportation on the Baja
16 path. Equalizing Baja and Redwood transportation rates as proposed by PG&E would reduce
17 Baja path rates from what they would be under path differentiation, leading to lower citygate
18 prices for both core and noncore customers. This is important for noncore customers because
19 most noncore end-users purchase gas at the citygate instead of border or basin points. It is also
20 important for the core, particularly given PG&E's recommendation to increase reliance on
21 citygate supplies to meet core requirements.

22 **4.1. Gas Supplies Delivered Across the Baja Path Are the Marginal Supplies for
23 the PG&E System.**

24 PG&E says that gas supplies delivered across the Baja path are the marginal or swing
25 supplies to the PG&E system. PG&E Testimony at 10-21. I agree. The load factor for deliveries
26 across the Baja path has averaged 59 percent over a recent twenty-four month period in contrast
27 to the 92 percent average load factor for the Redwood path during the same period. PG&E
28 PipeRanger website, Demand/Supply Archive, 6/15/12 to 6/14/14. The fact that Baja supplies are
the marginal supplies for the PG&E system is further illustrated by the fact that there were a
number of months during the last two years when bidweek indices were unavailable for the

1 PG&E South pricing point because there were insufficient transactions. Platt's Inside FERC's
2 Gas Market Report, Southwest/West Region, June 2012-June 2014; Platt's Methodology and
3 Specification Guide, North American Natural Gas, June 2014 at 5.

4 **4.2. PG&E's Citygate Prices Tend to Be Driven by the Incremental Cost of the**
5 **Marginal Source of Supply.**

6 The PG&E citygate and border markets are well functioning and liquid with ample
7 opportunity for price discovery. Sellers of gas into the citygate market will make sure that the
8 price they bid will at least cover their incremental costs, that is, the cost of gas plus transportation
9 costs including shrinkage.¹ Sellers who incur lower incremental costs will raise their prices to
10 match the prices of suppliers who incur the highest incremental costs. Thus, the incremental costs
11 of the marginal or swing supplier will set the price at the citygate.

12 Chart 1 below demonstrates that PG&E's citygate prices tend to be driven by the highest
13 incremental cost of transportation for the marginal source of gas supply for the PG&E system, the
14 Baja path. The chart shows the daily basis differential between the PG&E citygate price and the
15 PG&E South border price over the last two years.² The PG&E South border price is based on
16 border transactions for gas supplies that are delivered across the Baja path. The PG&E South
17 border prices establish the "cost of gas" for the Baja suppliers³. The Baja As-Available rate and
18 the Baja MFV usage rate are also shown in Chart 1. The Baja As-Available rate and the Baja
19 MFV usage rate represent the remaining incremental cost of transportation for Baja suppliers
20 during the period covered by Chart 1.

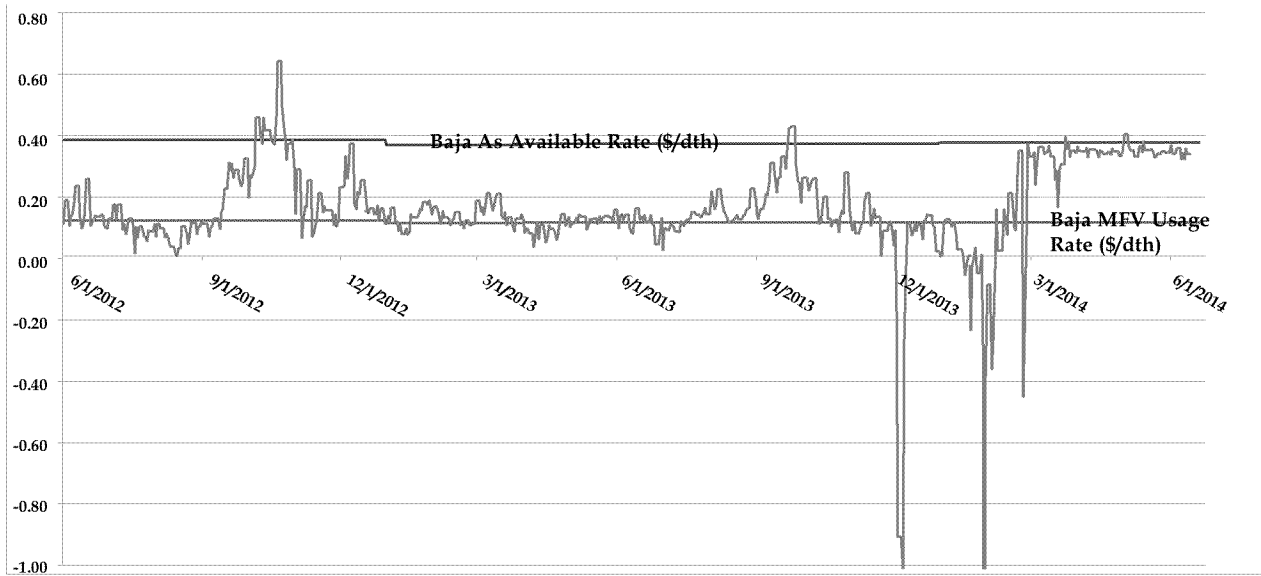
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25 ¹ Shrinkage occurs because PG&E uses gas in its pipelines for compressor fuel. Shippers receive less gas
26 from PG&E's backbone system than they deliver into the system. The "shrinkage" factor on PG&E's backbone
27 transmission system is approximately one percent.

28 ² The basis differential has been reduced by the cost of shrinkage along the Baja path.

³ The border point establishes an opportunity cost for suppliers that obtain their gas supply upstream of the
border point and an actual cost for suppliers that obtain their gas supply in the border market.

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**Chart 1:
Citygate to PG&E South Border Basis Versus Incremental Transportation Costs (\$/dth)**



Source: Platt's Gas Daily, Southwest/West Region, June 2012-June 2014; PG&E gas tariffs.

As shown in Chart 1, over the last two years the daily basis differential (PG&E citygate price minus the PG&E South border price) tends to match the highest incremental cost of transportation across the Baja path, either the Baja MFV usage rate or the Baja As-Available rate. Between June 2012 and February 2014, except for October 2012, the highest incremental cost of transportation was the Baja MFV usage rate because over 98 percent of the capacity utilized on the Baja path was firm capacity, and 95 percent of the firm capacity was held through MFV contracts.⁴ Attachment B: Response to SCGC-06, Q.6.8, Q.6.10, Q.6.12, PipeRanger Operating Data. Fifty-eight percent of the MFV contracts were held by the core. Attachment B: Response to SCGC-06, Q.6.10, PG&E Testimony at 19-2. Beginning in March, 2014, the highest incremental cost of transportation is the full Baja As-Available rate.⁵ As of March, 2014, marketers started to rely primarily on Baja As-Available capacity instead of firm MFV capacity to deliver gas to the citygate. Attachment B: Response to SCGC-06, Q.6.12. The total amount of firm capacity rights held on the Baja path has shrunk to 43 percent of Baja path capacity since

⁴ During October 2012, As-Available usage averaged nearly nine percent.

⁵ Because PG&E's As-Available rates are 120 percent of the total rate for firm service, the citygate price will reflect 120 percent of Baja path firm service rates when marketers rely on Baja as-available capacity.

1 March, 2014. Attachment B: Response to SCGC-06, Q.6.10. The core has held 79 percent of
2 those firm capacity rights. Attachment B: Response to SCGC-06, Q.6.10, PG&E Testimony at
3 19-2. The core's firm Baja capacity rights are expected to decline in 2015. PG&E Testimony at
4 19-2.

5 The jump in basis in mid-October 2012 reflects hot weather experienced in California and
6 Arizona during that time. The sharply negative basis shown in December 2013 and February
7 2014 reflects the prolonged extreme cold weather experienced in the central and eastern portions
8 of North America during those two months.

9 **5. The Market Efficiencies Created by the Gas Accord Structure Are Not Dependent**
10 **upon the Path Rate Differentials.**

11 As the Commission recognized in D.03-12-061, the Gas Accord structure has provided an
12 array of options for consumers and marketers:

13 Market participants can arrange to purchase gas supplies at the gas
14 basins, and have their supplies transported over interstate and
15 intrastate pipelines to the citygate or to the end-user. Or they can
16 choose to purchase supplies at the border, and have the supplies
17 delivered over the intrastate system, or they can choose to purchase
18 their gas supplies at the citygate. The unbundled, firm tradable
19 capacity rights has [sic] created a secondary market which allows
20 market participants to sell or trade their rights to maximize their gas
21 procurement strategies.

22 D.03-12-061, slip op. at 33. However, the efficiency of the citygate market and the secondary
23 markets does not depend upon having separate rates for separate paths. Instead, it is the
24 unbundling of backbone costs that has enabled the Gas Accord to operate efficiently. This is
25 demonstrated by the fact that the Gas Accord has continued to function well during the last two
26 settlement periods that have incorporated path rates that were quite close to equalization. The
27 Gas Accord IV Baja path rates were only \$0.025/dth higher than the Redwood path rates, and the
28 Gas Accord V Baja path rates were between \$0.025 and \$0.040/dth higher than the Redwood path
rates. PG&E Testimony at 10-20.

Path-differentiated rates were not created for the Redwood and Baja paths in the original
Gas Accord settlement to enhance competition. Path-differentiated rates were established to

1 address issues associated with the PG&E Expansion Project, Line 401. The incremental capital
2 cost of Line 401 was \$736 million. D.97-08-055, slip op. at 18. The Commission desired to ring-
3 fence the effect of this incremental cost so that the cost would be borne solely by shippers who
4 elected to use the incremental capacity. *Id.* at 15-16. The Commission accomplished its
5 objective by establishing separate rates for the Redwood and Baja paths that were based on
6 separate path-specific revenue requirements.

7 The Expansion project has been depreciated for over two decades, substantially reducing
8 its revenue requirement, while the revenue requirement of Line 300 is increasing. Thus, there is
9 no need to continue path-differentiated rates to protect non-Redwood shippers from the cost of
10 Line 401.

11 **6. The Southern California Gas Company and San Diego Gas and Electric Company**
12 **Firm Access Rights Program Demonstrates that Path-Differentiated Rates Are Not**
13 **Required to Support a System of Unbundled, Tradable Capacity Rights and a Fully**
14 **Functioning Citygate Market.**

15 The Firm Access Rights (“FAR”) program adopted several years ago for the Southern
16 California Gas Company and San Diego Gas and Electric Company (jointly,
17 “SoCalGas/SDG&E”) incorporates a system-wide rate for firm receipt rights and delivery across
18 the SoCalGas/SDG&E backbone transmission system to a SoCalGas/SDG&E citygate. No one
19 suggested that the lack of rate differentiation among delivery paths in southern California would
20 undermine the efficient functioning of the SoCalGas/SDG&E citygate market for natural gas or
21 the effectiveness of the SoCalGas/SDG&E secondary markets for backbone capacity.

22 In its decision adopting the FAR program for SoCalGas/SDG&E, the Commission
23 identified the benefits of unbundled tradable intrastate backbone transmission rights by using the
24 same language that I quoted previously from D.03-12-061:

25 Market participants can arrange to purchase gas supplies at the gas
26 basins, and have their supplies transported over interstate and
27 intrastate pipelines to the citygate or to the end-user. Or they can
28 choose to purchase supplies at the border, and have the supplies
delivered over the intrastate system, or they can choose to purchase
their gas supplies at the citygate. The unbundled, firm tradable
capacity rights has [sic] created a secondary market which allows
market participants to sell or trade their rights to maximize their gas
procurement strategies.

1 D.06-12-031, slip op. at 64. Clearly, the Commission believed that firm tradable rights on the
2 SoCalGas/SDG&E backbone transmission system would increase competitive options without
3 path-differentiated rates. No party in the proceeding even suggested that path-specific rates
4 would be appropriate.

5 The Commission re-evaluated the FAR structure in 2011. The Commission found the
6 FAR structure enabled the creation of a well-functioning citygate market for natural gas as well as
7 secondary markets for selling or trading capacity rights. The Commission observed that
8 “compared to the period prior to FAR implementation, the FAR system has substantially reduced
9 scheduling uncertainty, retained shippers’ flexibility, facilitates gas commodity exchanges at the
10 SoCalGas city-gate pool, and provides for a secondary market for trading unused short-term firm
11 capacity.” D.11-04-032, slip op. at 13. While the Commission made modifications to the then
12 existing FAR structure in its decision, the Commission never considered establishing path-
13 differentiated rates. Instead, the Commission adopted a full unbundling of backbone costs that
14 resulted in system-wide two-part SFV and MFV rates for firm backbone service and a system-
15 wide volumetric rate for as-available backbone service. *Id.* at 33.

16 **7. Conclusion**

17 The Commission should adopt PG&E’s proposal to separately equalize core and noncore
18 Redwood and Baja path rates. Equalizing Redwood and Baja path rates would benefit end-users
19 because it would reduce citygate prices from what they would be with path rate differentiation.
20 Path rate differentiation is no longer needed to protect non-Redwood shippers from the cost of
21 Line 401, and a comparison of the FAR and Gas Accord structures shows that path rate
22 differentials are not necessary to obtain the market efficiencies that can result from an unbundled
23 backbone transmission system.
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Attachment A: Qualifications of Catherine E. Yap

Attachment A
Qualifications of Catherine E. Yap

Q1. Please state your name and business address.

A1. My name is Catherine E. Yap and my address is Barkovich & Yap, Inc., P.O. Box 11031, Oakland, California 94611.

Q2. Please state your qualifications to offer this testimony.

A2. I am a principal in the firm of Barkovich & Yap, Inc., and have been consulting in the utility regulatory area for over twenty-five years. During this time, I have directed and/or performed major examinations of cost-of-service requirements, allocation, rate design, and customer bill effects for electric, natural gas, water, and solid waste utilities. I have testified on numerous occasions before the California Public Utilities Commission (“Commission”) and in civil proceedings. I have consulted internationally on issues related to natural gas industry structure and marginal cost allocation and rate design.

Prior to this, I was employed for nine years by the Commission. Most recently, I was responsible for managing the Energy Rate Design and Economics Branch of the Public Staff Division (“PSD”). This branch was responsible for developing cost of service, rate design, and economic studies, such as sales forecasting and productivity assessment, for both electric and gas utilities. Members of the branch were responsible for presenting expert testimony, developing cost of service studies, and designing unbundled rates for the natural gas utilities during the Commission's extensive hearings on gas industry structure and rate design implementation. During this time, I participated extensively in the formulation of policy regarding the appropriate structure for the natural gas industry in California.

Previously, I was the Supervisor of the Gas Supply and Requirements Section of the Fuels Branch of the PSD. I was responsible for directing, and in some cases performing, advanced technical studies that evaluated California gas utility operations and associated contracts, investments, and expenses. I also acted as the highest level technical representative of the CPUC on natural gas matters and was involved in numerous negotiated settlements involving natural gas pipelines, distribution utilities, producers, and state and federal regulatory agencies.

1 Prior to that, I was a staff economist in the Policy Division acting as a consultant to the
2 Executive Director and to various Commissioners. I also testified on numerous occasions as an
3 expert witness regarding a variety of technical, economic, and financial matters related to electric
4 and natural gas utilities.

5 I have a B.A. in chemical physics from the University of California at Santa Cruz, and a
6 M.S. in Energy and Resources from the University of California at Berkeley. I have also taken
7 course work in finance, accounting, and organization theory from the University of California,
8 Extension, and Golden Gate University.

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Attachment B: Response to SCGC-06

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-01		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q01		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 1

Please state the quantity of Redwood SFV capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 1

The quantity of Redwood Straight Fixed Variable (SFV) capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below in decatherms/day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	190,587	214,937	194,937	282,687	282,687	282,777
February	190,587	214,937	188,937	282,687	282,687	282,777
March	190,587	214,937	188,937	282,687	282,687	282,777
April	315,587	194,937	188,937	282,687	282,687	282,777
May	165,587	194,937	188,937	282,687	282,687	282,777
June	165,587	194,937	178,937	282,687	282,687	
July	165,587	194,937	432,937	282,687	282,687	
August	165,587	194,937	432,937	282,687	282,687	
September	165,587	194,937	432,937	282,687	282,687	
October	165,587	194,937	432,937	282,687	282,687	
November	165,587	194,937	308,687	282,687	282,687	
December	165,587	194,937	308,687	282,687	282,687	
Excludes: SMUD Equity, EAD and Negotiated Off-System capacities						

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-02		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q02		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 2

Please state the quantity of Redwood MFV capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 2

The quantity of Redwood Modified Fixed Variable (MFV) capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is as follows, in decatherms/day (Dth/d):

	2009	2010	2011	2012	2013	2014
January	697,050	702,050	979,600	1,181,200	1,127,200	1,466,800
February	697,050	703,267	979,600	1,181,200	1,311,700	1,294,300
March	717,050	721,405	979,600	1,181,200	1,361,700	1,294,300
April	702,050	892,050	984,600	1,365,700	1,371,700	1,439,800
May	702,050	909,550	984,600	1,365,700	1,371,700	1,439,800
June	702,050	1,084,550	1,009,600	1,365,700	1,371,700	
July	702,050	1,104,550	1,084,600	1,365,700	1,371,700	
August	702,050	1,104,550	1,134,600	1,365,700	1,371,700	
September	702,050	929,550	1,273,116	1,365,700	1,371,700	
October	702,050	929,550	1,273,116	1,356,200	1,371,700	
November	702,050	899,550	1,378,970	1,592,700	1,221,700	
December	702,050	899,550	1,287,100	996,200	1,221,700	
Excludes: SMUD Equity, Expedited Application Docket (EAD) and Negotiated Off-System capacities						

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-03		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q03		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 3

Please state the quantity of Redwood seasonal firm capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 3

The quantity of Redwood seasonal firm capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms / day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	0	0	0	0	0	0
February	0	0	0	0	0	0
March	0	0	0	0	0	0
April	0	0	0	9,500	0	132,500
May	0	0	0	9,500	0	132,500
June	0	0	0	9,500	0	
July	0	0	0	9,500	0	
August	0	0	0	9,500	0	
September	0	0	0	9,500	0	
October	0	0	0	0	0	
November	0	0	0	0	0	
December	0	0	0	0	0	

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-04		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q04		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 4

Please state the quantity of Redwood firm capacity that was released during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 4

The quantity of Redwood firm capacity that was released during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms / day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	887,637	916,987	1,174,537	1,463,887	1,409,887	1,749,577
February	887,637	918,204	1,168,537	1,463,887	1,594,387	1,577,077
March	907,637	936,342	1,168,537	1,463,887	1,644,387	1,577,077
April	1,017,637	1,086,987	1,173,537	1,648,387	1,654,387	1,722,577
May	867,637	1,104,487	1,173,537	1,648,387	1,654,387	1,722,577
June	867,637	1,279,487	1,188,537	1,648,387	1,654,387	
July	867,637	1,299,487	1,517,537	1,648,387	1,654,387	
August	867,637	1,299,487	1,567,537	1,648,387	1,654,387	
September	867,637	1,124,487	1,706,053	1,648,387	1,654,387	
October	867,637	1,124,487	1,706,053	1,638,887	1,654,387	
November	867,637	1,094,487	1,687,657	1,875,387	1,504,387	
December	867,637	1,094,487	1,595,787	1,278,887	1,504,387	
Excludes: SMUD Equity, Expedited Application Docket (EAD) and Negotiated Off-System capacities						

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	SCGC_006-05		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q05		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 5

Please state the quantity of Redwood brokered firm capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 5

The quantity of Redwood brokered firm capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d). Note that the actual usage associated with brokered capacity is not readily available and would be burdensome to produce. The figures below represent the brokered capacity quantity itself.

	2009	2010	2011	2012	2013	2014
January	35,912	31,923	64,033	34,033	34,033	34,751
February	35,912	32,114	70,033	34,033	34,033	33,423
March	130,912	32,114	70,033	34,033	34,033	36,870
April	35,912	31,923	70,033	34,033	34,033	37,570
May	81,923	101,923	70,033	34,033	33,333	46,142
June	192,091	101,923	70,033	34,033	33,333	
July	256,140	131,923	165,033	54,505	68,333	
August	256,333	131,923	165,033	54,033	33,333	
September	256,333	131,923	165,033	54,033	52,333	
October	62,350	31,923	70,033	34,033	33,333	
November	32,331	31,932	70,033	34,033	34,661	
December	32,114	31,932	70,033	34,033	24,547	

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PG&E Data Request No.:	SCGC_006-06		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q06		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 6

Please state the amount of Redwood As Available capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 6

See GTS-RateCase2015_DR_SCGC_006-Q06Atch01 for a list of the Redwood As Available (AA) capacity used to deliver gas for each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

GTS-RateCase2015_DR_SCGC_006-Q06Atch01

has been omitted because of its size

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	SCGC_006-07		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q07		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 7

Please state the quantity of Baja SFV capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 7

The quantity of Baja Straight Fixed Variable (SFV) capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	101,000	21,000	60,000	41,000	41,000	40,000
February	101,000	21,000	60,000	41,000	41,000	40,000
March	258,000	271,000	60,000	41,000	41,000	40,000
April	131,000	131,000	60,000	41,000	41,000	40,000
May	131,000	131,000	60,000	41,000	41,000	40,000
June	131,000	131,000	50,000	41,000	41,000	
July	131,000	131,000	50,000	41,000	41,000	
August	131,000	131,000	50,000	41,000	41,000	
September	151,000	131,000	50,000	41,000	41,000	
October	331,000	131,000	50,000	41,000	41,000	
November	332,500	271,000	50,000	41,000	41,000	
December	81,000	21,000	50,000	41,000	41,000	
Excludes: SMUD Equity and EAD capacities						

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PG&E Data Request No.:	SCGC_006-08		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q08		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 8

Please state the quantity of Baja MFV capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 8

The quantity of Baja Modified Fixed Variable (MFV) capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	962,474	1,042,474	1,003,550	1,016,500	1,016,500	669,000
February	962,474	1,042,474	1,003,500	1,016,500	1,016,500	669,000
March	641,474	721,474	874,000	695,500	695,500	348,000
April	862,474	861,474	874,000	695,500	695,500	348,000
May	862,474	861,474	874,000	695,500	695,500	428,000
June	862,474	686,474	874,000	695,500	695,500	
July	714,474	686,474	767,500	695,500	695,500	
August	717,974	686,474	767,500	695,500	695,500	
September	717,974	861,474	874,000	695,500	695,500	
October	711,474	861,474	874,000	695,500	695,500	
November	711,474	721,474	874,000	695,500	692,000	
December	982,474	1,040,500	1,008,200	1,016,500	1,013,000	
Excludes: SMUD Equity and EAD capacities						

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Data Response

PG&E Data Request No.:	SCGC_006-09		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q09		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 9

Please state the quantity of Baja seasonal firm capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 9

The quantity of Baja seasonal firm capacity that was held during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	0	0	0	0	0	0
February	0	0	0	0	0	0
March	0	30,000	0	0	0	0
April	248,000	250,000	0	0	0	0
May	248,000	250,000	0	0	0	80,000
June	248,000	250,000	0	0	0	
July	100,000	250,000	0	0	0	
August	100,000	250,000	0	0	0	
September	100,000	250,000	0	0	0	
October	100,000	250,000	0	0	0	
November	100,000	50,000	0	0	0	
December	0	0	0	0	0	

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PG&E Data Request No.:	SCGC_006-10		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q10		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 10

Please state the quantity of Baja firm capacity that was released during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 10

The quantity of Baja firm capacity that was released during each month of the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d).

	2009	2010	2011	2012	2013	2014
January	1,063,474	1,063,474	1,063,550	1,057,500	1,057,500	709,000
February	1,063,474	1,063,474	1,063,500	1,057,500	1,057,500	709,000
March	899,474	992,474	934,000	736,500	736,500	388,000
April	993,474	992,474	934,000	736,500	736,500	388,000
May	993,474	992,474	934,000	736,500	736,500	468,000
June	993,474	817,474	924,000	736,500	736,500	
July	845,474	817,474	817,500	736,500	736,500	
August	848,974	817,474	817,500	736,500	736,500	
September	868,974	992,474	924,000	736,500	736,500	
October	1,042,474	992,474	924,000	736,500	736,500	
November	1,043,974	992,474	924,000	736,500	733,000	
December	1,063,474	1,061,500	1,058,200	1,057,500	1,054,000	
Excludes: SMUD Equity and EAD capacities						

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PG&E Data Request No.:	SCGC_006-11		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q11		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 11

Please state the quantity of Baja brokered firm capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 11

The quantity of Baja brokered firm capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date is shown below, in decatherms/day (Dth/d). Note that the actual usage associated with brokered capacity is not readily available and would be burdensome to produce. The figures below represent the brokered capacity quantity itself.

	2009	2010	2011	2012	2013	2014
January	0	20,000	21,000	1,000	14,320	1,459
February	125,000	50,000	41,000	106,000	114,320	0
March	0	0	1,000	1,000	38,184	1,970
April	4,581	0	1,000	1,000	28,292	4,502
May	4,732	0	121,000	111,000	28,292	4,502
June	0	99,790	150,000	131,000	28,292	
July	0	115,000	71,000	57,632	38,346	
August	80,000	215,000	21,000	26,544	38,346	
September	110,000	150,000	1,000	101,544	198,346	
October	170,000	110,000	88,000	229,192	188,346	
November	35,202	50,000	1,000	1,000	1,759	
December	90,000	30,000	1,000	1,000	1,459	

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PG&E Data Request No.:	SCGC_006-12		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q12		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 12

Please state the amount of Baja As Available capacity that was used to deliver gas each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

ANSWER 12

See GTS-RateCase2015_DR_SCGC_006-Q12Atch01 for a list of the Baja As Available (AA) capacity used to deliver gas for each day during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

Excerpt from
GTS-RateCase2015_DR_SCGC_006-Q12A1ch01
June 1, 2012 through May 31, 2014

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
6/1/2012	0
6/2/2012	0
6/3/2012	0
6/4/2012	0
6/5/2012	0
6/6/2012	2,684
6/7/2012	0
6/8/2012	0
6/9/2012	0
6/10/2012	0
6/11/2012	0
6/12/2012	9
6/13/2012	9
6/14/2012	6,968
6/15/2012	0
6/16/2012	9
6/17/2012	9
6/18/2012	9
6/19/2012	9
6/20/2012	9
6/21/2012	9
6/22/2012	9
6/23/2012	9
6/24/2012	11,889
6/25/2012	2
6/26/2012	2,672
6/27/2012	0
6/28/2012	0
6/29/2012	3,795
6/30/2012	3,856
7/1/2012	11
7/2/2012	9,920
7/3/2012	5,000
7/4/2012	5,000
7/5/2012	0
7/6/2012	0
7/7/2012	5,004
7/8/2012	5,004
7/9/2012	5,004
7/10/2012	10,004
7/11/2012	4
7/12/2012	8,163
7/13/2012	7,557
7/14/2012	0
7/15/2012	0
7/16/2012	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
7/17/2012	0
7/18/2012	0
7/19/2012	41
7/20/2012	0
7/21/2012	0
7/22/2012	0
7/23/2012	0
7/24/2012	0
7/25/2012	35,001
7/26/2012	29,251
7/27/2012	0
7/28/2012	8
7/29/2012	0
7/30/2012	0
7/31/2012	0
8/1/2012	0
8/2/2012	16,153
8/3/2012	2,002
8/4/2012	10,000
8/5/2012	10,000
8/6/2012	0
8/7/2012	0
8/8/2012	8,003
8/9/2012	0
8/10/2012	9,900
8/11/2012	0
8/12/2012	0
8/13/2012	0
8/14/2012	0
8/15/2012	0
8/16/2012	0
8/17/2012	0
8/18/2012	0
8/19/2012	0
8/20/2012	0
8/21/2012	0
8/22/2012	12
8/23/2012	16
8/24/2012	0
8/25/2012	0
8/26/2012	0
8/27/2012	0
8/28/2012	0
8/29/2012	0
8/30/2012	0
8/31/2012	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
9/1/2012	0
9/2/2012	0
9/3/2012	0
9/4/2012	0
9/5/2012	0
9/6/2012	0
9/7/2012	0
9/8/2012	10,048
9/9/2012	10,048
9/10/2012	10,048
9/11/2012	1
9/12/2012	0
9/13/2012	0
9/14/2012	6,023
9/15/2012	0
9/16/2012	0
9/17/2012	0
9/18/2012	4,598
9/19/2012	0
9/20/2012	0
9/21/2012	0
9/22/2012	0
9/23/2012	0
9/24/2012	31,136
9/25/2012	21,811
9/26/2012	21,219
9/27/2012	3,954
9/28/2012	0
9/29/2012	0
9/30/2012	0
10/1/2012	0
10/2/2012	0
10/3/2012	12,575
10/4/2012	0
10/5/2012	0
10/6/2012	220,174
10/7/2012	158,573
10/8/2012	58,502
10/9/2012	45,098
10/10/2012	166,245
10/11/2012	302,631
10/12/2012	335,856
10/13/2012	267,397
10/14/2012	266,551
10/15/2012	110,730
10/16/2012	72,203

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
10/17/2012	4,950
10/18/2012	43,508
10/19/2012	96,748
10/20/2012	153,295
10/21/2012	123,240
10/22/2012	114,640
10/23/2012	113,267
10/24/2012	77,639
10/25/2012	10,890
10/26/2012	3,295
10/27/2012	146
10/28/2012	153
10/29/2012	6,000
10/30/2012	0
10/31/2012	17,604
11/1/2012	0
11/2/2012	24,622
11/3/2012	19,482
11/4/2012	118,330
11/5/2012	0
11/6/2012	0
11/7/2012	0
11/8/2012	0
11/9/2012	30,907
11/10/2012	0
11/11/2012	0
11/12/2012	20,000
11/13/2012	0
11/14/2012	0
11/15/2012	0
11/16/2012	0
11/17/2012	38,701
11/18/2012	12,474
11/19/2012	0
11/20/2012	4,950
11/21/2012	0
11/22/2012	0
11/23/2012	0
11/24/2012	0
11/25/2012	0
11/26/2012	50,000
11/27/2012	0
11/28/2012	0
11/29/2012	0
11/30/2012	0
12/1/2012	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
12/2/2012	0
12/3/2012	0
12/4/2012	0
12/5/2012	0
12/6/2012	7,659
12/7/2012	0
12/8/2012	15,950
12/9/2012	2,475
12/10/2012	0
12/11/2012	0
12/12/2012	0
12/13/2012	0
12/14/2012	0
12/15/2012	0
12/16/2012	0
12/17/2012	0
12/18/2012	0
12/19/2012	0
12/20/2012	0
12/21/2012	0
12/22/2012	0
12/23/2012	0
12/24/2012	0
12/25/2012	26
12/26/2012	26
12/27/2012	26
12/28/2012	26
12/29/2012	26
12/30/2012	0
12/31/2012	1,000
1/1/2013	0
1/2/2013	0
1/3/2013	17,875
1/4/2013	13,013
1/5/2013	0
1/6/2013	18,768
1/7/2013	23,940
1/8/2013	15,000
1/9/2013	0
1/10/2013	0
1/11/2013	0
1/12/2013	0
1/13/2013	0
1/14/2013	0
1/15/2013	15,144
1/16/2013	12,900

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
1/17/2013	0
1/18/2013	0
1/19/2013	0
1/20/2013	0
1/21/2013	0
1/22/2013	0
1/23/2013	12,012
1/24/2013	16,304
1/25/2013	1,084
1/26/2013	0
1/27/2013	0
1/28/2013	0
1/29/2013	0
1/30/2013	4,259
1/31/2013	0
2/1/2013	0
2/2/2013	0
2/3/2013	0
2/4/2013	0
2/5/2013	10,451
2/6/2013	0
2/7/2013	0
2/8/2013	0
2/9/2013	0
2/10/2013	0
2/11/2013	0
2/12/2013	6,377
2/13/2013	0
2/14/2013	0
2/15/2013	0
2/16/2013	0
2/17/2013	0
2/18/2013	0
2/19/2013	0
2/20/2013	0
2/21/2013	10,767
2/22/2013	1,089
2/23/2013	0
2/24/2013	0
2/25/2013	0
2/26/2013	0
2/27/2013	0
2/28/2013	0
3/1/2013	17,764
3/2/2013	14,433
3/3/2013	9,897

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
3/4/2013	0
3/5/2013	0
3/6/2013	0
3/7/2013	0
3/8/2013	688
3/9/2013	0
3/10/2013	0
3/11/2013	0
3/12/2013	0
3/13/2013	0
3/14/2013	0
3/15/2013	0
3/16/2013	0
3/17/2013	0
3/18/2013	5,984
3/19/2013	9,250
3/20/2013	17
3/21/2013	17
3/22/2013	17
3/23/2013	17
3/24/2013	8
3/25/2013	0
3/26/2013	4,810
3/27/2013	0
3/28/2013	0
3/29/2013	0
3/30/2013	0
3/31/2013	0
4/1/2013	19,170
4/2/2013	0
4/3/2013	10,028
4/4/2013	5,926
4/5/2013	9,849
4/6/2013	0
4/7/2013	0
4/8/2013	0
4/9/2013	4,001
4/10/2013	20
4/11/2013	0
4/12/2013	33,736
4/13/2013	15
4/14/2013	15
4/15/2013	15
4/16/2013	0
4/17/2013	0
4/18/2013	5

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
4/19/2013	20
4/20/2013	0
4/21/2013	11,880
4/22/2013	18,117
4/23/2013	0
4/24/2013	0
4/25/2013	1,330
4/26/2013	20
4/27/2013	0
4/28/2013	50,000
4/29/2013	986
4/30/2013	6,020
5/1/2013	0
5/2/2013	0
5/3/2013	0
5/4/2013	24,750
5/5/2013	45,456
5/6/2013	0
5/7/2013	0
5/8/2013	0
5/9/2013	0
5/10/2013	0
5/11/2013	0
5/12/2013	0
5/13/2013	12,179
5/14/2013	22,116
5/15/2013	277
5/16/2013	18,018
5/17/2013	0
5/18/2013	0
5/19/2013	0
5/20/2013	20,470
5/21/2013	0
5/22/2013	0
5/23/2013	0
5/24/2013	0
5/25/2013	0
5/26/2013	0
5/27/2013	0
5/28/2013	0
5/29/2013	0
5/30/2013	0
5/31/2013	0
6/1/2013	0
6/2/2013	0
6/3/2013	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
6/4/2013	0
6/5/2013	0
6/6/2013	0
6/7/2013	0
6/8/2013	0
6/9/2013	0
6/10/2013	0
6/11/2013	0
6/12/2013	1,738
6/13/2013	70,771
6/14/2013	0
6/15/2013	0
6/16/2013	0
6/17/2013	0
6/18/2013	0
6/19/2013	98
6/20/2013	0
6/21/2013	0
6/22/2013	0
6/23/2013	0
6/24/2013	0
6/25/2013	0
6/26/2013	1,805
6/27/2013	53,267
6/28/2013	15,000
6/29/2013	1,100
6/30/2013	1,100
7/1/2013	90
7/2/2013	10,010
7/3/2013	1
7/4/2013	0
7/5/2013	0
7/6/2013	0
7/7/2013	0
7/8/2013	0
7/9/2013	8,138
7/10/2013	22,150
7/11/2013	3,126
7/12/2013	0
7/13/2013	0
7/14/2013	0
7/15/2013	0
7/16/2013	41,013
7/17/2013	0
7/18/2013	0
7/19/2013	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
7/20/2013	0
7/21/2013	0
7/22/2013	0
7/23/2013	0
7/24/2013	0
7/25/2013	0
7/26/2013	0
7/27/2013	34,060
7/28/2013	0
7/29/2013	0
7/30/2013	41
7/31/2013	42
8/1/2013	16
8/2/2013	16
8/3/2013	16
8/4/2013	16
8/5/2013	16
8/6/2013	0
8/7/2013	16
8/8/2013	0
8/9/2013	0
8/10/2013	0
8/11/2013	100
8/12/2013	100
8/13/2013	0
8/14/2013	16
8/15/2013	16
8/16/2013	16
8/17/2013	16
8/18/2013	16
8/19/2013	7,591
8/20/2013	7,516
8/21/2013	16
8/22/2013	16
8/23/2013	16
8/24/2013	16
8/25/2013	549
8/26/2013	16
8/27/2013	0
8/28/2013	0
8/29/2013	0
8/30/2013	0
8/31/2013	0
9/1/2013	0
9/2/2013	0
9/3/2013	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
9/4/2013	12,500
9/5/2013	5,000
9/6/2013	0
9/7/2013	0
9/8/2013	0
9/9/2013	0
9/10/2013	0
9/11/2013	0
9/12/2013	0
9/13/2013	0
9/14/2013	0
9/15/2013	0
9/16/2013	0
9/17/2013	0
9/18/2013	0
9/19/2013	0
9/20/2013	0
9/21/2013	0
9/22/2013	3,443
9/23/2013	9
9/24/2013	16,000
9/25/2013	34,691
9/26/2013	35,245
9/27/2013	180,486
9/28/2013	71,323
9/29/2013	74,339
9/30/2013	71,271
10/1/2013	0
10/2/2013	0
10/3/2013	0
10/4/2013	0
10/5/2013	0
10/6/2013	0
10/7/2013	0
10/8/2013	0
10/9/2013	0
10/10/2013	0
10/11/2013	0
10/12/2013	0
10/13/2013	0
10/14/2013	0
10/15/2013	0
10/16/2013	0
10/17/2013	0
10/18/2013	0
10/19/2013	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
10/20/2013	0
10/21/2013	0
10/22/2013	0
10/23/2013	0
10/24/2013	0
10/25/2013	0
10/26/2013	0
10/27/2013	0
10/28/2013	0
10/29/2013	0
10/30/2013	0
10/31/2013	0
11/1/2013	0
11/2/2013	0
11/3/2013	39,875
11/4/2013	0
11/5/2013	0
11/6/2013	0
11/7/2013	0
11/8/2013	0
11/9/2013	0
11/10/2013	19,534
11/11/2013	0
11/12/2013	0
11/13/2013	0
11/14/2013	0
11/15/2013	0
11/16/2013	10,287
11/17/2013	0
11/18/2013	0
11/19/2013	0
11/20/2013	2
11/21/2013	0
11/22/2013	0
11/23/2013	2
11/24/2013	4,489
11/25/2013	3,537
11/26/2013	0
11/27/2013	0
11/28/2013	0
11/29/2013	0
11/30/2013	0
12/1/2013	0
12/2/2013	0
12/3/2013	11,555
12/4/2013	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
12/5/2013	5,000
12/6/2013	10,000
12/7/2013	50,844
12/8/2013	31,000
12/9/2013	46,000
12/10/2013	14,970
12/11/2013	24,749
12/12/2013	0
12/13/2013	0
12/14/2013	0
12/15/2013	0
12/16/2013	0
12/17/2013	0
12/18/2013	0
12/19/2013	0
12/20/2013	0
12/21/2013	0
12/22/2013	0
12/23/2013	0
12/24/2013	0
12/25/2013	0
12/26/2013	0
12/27/2013	0
12/28/2013	0
12/29/2013	0
12/30/2013	0
12/31/2013	0
1/1/2014	792
1/2/2014	792
1/3/2014	792
1/4/2014	792
1/5/2014	792
1/6/2014	30,792
1/7/2014	792
1/8/2014	792
1/9/2014	792
1/10/2014	792
1/11/2014	792
1/12/2014	792
1/13/2014	792
1/14/2014	801
1/15/2014	796
1/16/2014	918
1/17/2014	5,791
1/18/2014	792
1/19/2014	792

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
1/20/2014	13,292
1/21/2014	8,292
1/22/2014	792
1/23/2014	792
1/24/2014	792
1/25/2014	5,806
1/26/2014	5,806
1/27/2014	5,806
1/28/2014	2,675
1/29/2014	263
1/30/2014	803
1/31/2014	20,748
2/1/2014	757
2/2/2014	698
2/3/2014	1,385
2/4/2014	767
2/5/2014	752
2/6/2014	27,348
2/7/2014	5,581
2/8/2014	34,371
2/9/2014	35,063
2/10/2014	34,642
2/11/2014	737
2/12/2014	755
2/13/2014	767
2/14/2014	767
2/15/2014	767
2/16/2014	767
2/17/2014	711
2/18/2014	767
2/19/2014	767
2/20/2014	12,316
2/21/2014	2,821
2/22/2014	277,631
2/23/2014	287,144
2/24/2014	253,201
2/25/2014	16,424
2/26/2014	14,394
2/27/2014	24,203
2/28/2014	24,703
3/1/2014	233,006
3/2/2014	233,706
3/3/2014	215,482
3/4/2014	76,252
3/5/2014	0
3/6/2014	0

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
3/7/2014	195,194
3/8/2014	113,431
3/9/2014	115,577
3/10/2014	214,924
3/11/2014	198,170
3/12/2014	39,001
3/13/2014	86,373
3/14/2014	391,200
3/15/2014	202,250
3/16/2014	203,831
3/17/2014	210,151
3/18/2014	236,315
3/19/2014	179,672
3/20/2014	219,717
3/21/2014	206,448
3/22/2014	163,331
3/23/2014	163,346
3/24/2014	150,788
3/25/2014	184,038
3/26/2014	187,289
3/27/2014	63,447
3/28/2014	46,571
3/29/2014	200,177
3/30/2014	200,183
3/31/2014	200,173
4/1/2014	401,323
4/2/2014	498,245
4/3/2014	329,306
4/4/2014	369,247
4/5/2014	567,711
4/6/2014	564,754
4/7/2014	510,974
4/8/2014	543,310
4/9/2014	602,827
4/10/2014	276,263
4/11/2014	339,890
4/12/2014	543,686
4/13/2014	578,957
4/14/2014	424,585
4/15/2014	165,215
4/16/2014	277,274
4/17/2014	302,892
4/18/2014	503,609
4/19/2014	506,339
4/20/2014	506,500
4/21/2014	477,458

<u>Date</u>	<u>AA Throughput (Dth/d)</u>
4/22/2014	445,170
4/23/2014	325,278
4/24/2014	370,570
4/25/2014	375,244
4/26/2014	699,613
4/27/2014	682,174
4/28/2014	515,878
4/29/2014	299,973
4/30/2014	417,917
5/1/2014	281,561
5/2/2014	524,979
5/3/2014	710,828
5/4/2014	684,465
5/5/2014	567,060
5/6/2014	515,243
5/7/2014	508,787
5/8/2014	684,603
5/9/2014	608,731
5/10/2014	606,007
5/11/2014	661,138
5/12/2014	467,283
5/13/2014	408,765
5/14/2014	237,135
5/15/2014	356,535
5/16/2014	411,545
5/17/2014	451,389
5/18/2014	575,279
5/19/2014	589,816
5/20/2014	677,843
5/21/2014	515,739
5/22/2014	413,911
5/23/2014	564,696
5/24/2014	568,067
5/25/2014	679,553
5/26/2014	622,429
5/27/2014	493,630
5/28/2014	314,427
5/29/2014	325,937
5/30/2014	370,939
5/31/2014	428,037

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-13		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q13		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 13

Has PG&E discounted As Available capacity that was used to deliver gas on system on any date during the years 2009, 2010, 2011, 2012, 2013 and 2014?

ANSWER 13

No, PG&E has not discounted As Available capacity that was used to deliver gas on system on any date during the years 2009, 2010, 2011, 2012, 2013 and 2014 to date.

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	SCGC_006-14		
PG&E File Name:	GTS-RateCase2015_DR_SCGC_006-Q14		
Request Date:	June 21, 2014	Requester DR No.:	006
Date Sent:	July 7, 2014	Requesting Party:	Southern California Generation Coalition
PG&E Witness:	Mel Christopher	Requester:	Norman Pedersen/ Cathy Yap

QUESTION 14

If the answer to the previous question is “yes,” please identify the amount of the discount, the date(s) that the discount occurred, the amount of capacity that was discounted on each date(s), and which path(s) the discount was applied to.

ANSWER 14

Not applicable, the answer to SCGC_006-Q13 is “No”.