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Revision of Comments on the 2021 Draft IEPR

Additional submitted attachment is included below.



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March 7, 2022

Heather Raitt
Assistant Executive Director
California Energy Commission
Docket Unit, MS-4
Docket No. 21-IEPR-01
715 P Street
Sacramento, CA 95814-5512

Subject: Revision of Comments on the 2021 Draft Integrated Energy Policy Report (IEPR)

Dear Heather Raitt,

Southern California Gas Company (SoCalGas) respectfully submits a revised version of Pages 12-14 of document number TN 241063 to its comments titled “SoCalGas Comments on the CEC 2021 Draft IEPR,” which was submitted to Docket Number 21-IEPR-01 (Comments). The revised language is intended to provide a more accurate representation of the data based on further assessment and is attached hereto. Specifically, we request to: (1) Replace Figure 1 located on Page 14 of our Comments with a Revised Figure 1 shown below (2) Add language to provide context on the Revised Figure 1 on Pages 12-13; and (3) Delete Figure 2 located on Page 14.

Items 1 and 2: Replacement of Figure 1 on Page 14 with [Revised] Figure 1 and the Replacement of Language on Page 13, para. 1 and 2.

SoCalGas respectfully requests that the language on Page 13 and the current Figure 1 on Page 14 be removed and replaced with the following language and [Revised] Figure 1:

For some customers, dissuading gas line extensions could negatively impact energy reliability. Commercial, industrial, and medical baseline facilities need high levels of energy reliability. If those customers were in all-electric buildings in areas with low electricity reliability, then they could suffer undue burdens as opposed to those customers in higher reliability areas. For Southern California, Southern California Edison’s (SCE) service territory overlaps the most with SoCalGas’s service territory. Figure 1 below names the circuit and the total max duration of outages for 14 Riverside County circuits from October 2019 through the end of January 2021 in

SCE’s service territory. Based on the data aggregated and available on the CPUC website¹, the total number of unique customers affected by these PSPS events (including subgroups like commercial and industrial and medical baseline customers) cannot be ascertained. Because the total unique number of customers cannot be ascertained from the public dataset, the common reliability metric known as the Customer Average Interruption Disruption Index (CAIDI)² cannot be calculated. Given these data limitations, Figure 1 below simply calculates the total max duration³ of these PSPS events, by circuit, over the measured period in the CPUC dataset.

[Revised] Figure 1: Total Max Duration of Outages (Hours) for 14 Riverside County Circuits (October 2019 to January 2021)

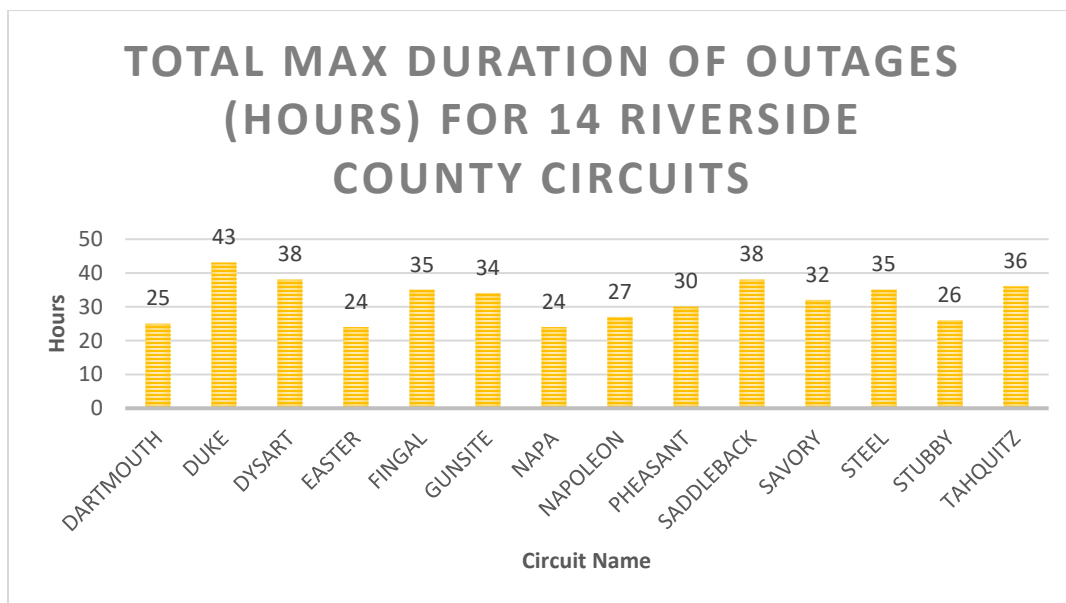


Figure 1 does not include those outage hours from the following circuits: Dartmouth 12kv, Pheasant 12kv, Steel 12kv, Stubby 33kv or Tahquitz 12kv.

¹ See CPUC PSPS Event Rollup October 2013 through December 2021, available at: <https://www.cpuc.ca.gov/consumer-support/psps/utility-company-psps-post-event-reports>

² CAIDI is calculated by the total minutes or hours of customer interruption divided by the total number of customers affected. See Reliability Indices for Utilities, available at: http://www.egr.unlv.edu/~cebag/Reliability_Indices_for_Utilities.pdf

³ [Revised] Figure 1 simply calculates the total max duration of these PSPS events by circuit over the measured period in the CPUC dataset. This is a conservative estimate as it may undercount in cases where there is more than one outage on a circuit during a single “event” or the circuit experienced more than one PSPS event from October 2019 to January 2021. The data source for this analysis is based on the CPUC rolled up report.

Item 3: Deletion of Figure 2 Based on Later Discovered Data Issues Following Discussions with Southern California Edison Company (SCE)

SoCalGas requests that the Figure 2 on Page 14 be removed and the addition of a “[Figure 2 Removed]” to TN 241063. On January 27, 2021, SoCalGas met with Southern California Edison (SCE) to discuss our understanding of the data and get their input on best practices for interpretation. We used the Mettler circuit as an example to calculate customer hours interrupted (a key component for calculating CAIDI). As we walked through the Mettler data from the CPUC website and their internal data system, several discrepancies were noted.

The time stamps for when outages started on the Mettler circuit on 12/2/20 in the CPUC data set did not align with SCE’s data. When calculating customer hours interrupted across all outages on the Mettler circuit, the CPUC dataset customer hours were about double what SCE calculated based on the data in their system. Additionally, SCE acknowledged that there was no way to discern the unique number of customers based on the data in the CPUC spreadsheet. This a key variable needed for the public to calculate the CAIDI metric to properly understand customer reliability impacts over time.

Because of these later learned data discrepancies, at this time, SoCalGas is not certain that Figure 2 provides an accurate reflection of the data as it was originally intended. Accordingly, SoCalGas requests Figure 2 on Page 14 be deleted.

Conclusion

SoCalGas appreciates your consideration of its requested revisions for the reasons stated herein. SoCalGas also appreciates the engagement with SCE and feedback we have received regarding the PSPS data and appreciate the opportunity to correct our previously filed comments. We look forward to continuing productive discussions moving into the next 2022 IEPR cycle.

Respectfully,

/s/ Kevin Barker

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Energy and Environmental Policy