PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



September 15, 2008

Advice Letter 3878

Ken Deremer Director Tariffs & Regulatory Accounts 8330 Century Park Court CP32C San Diego, CA 92123-1548

Subject: Report on Backbone Transmission and Slack Capacity in

Compliance with Decision 06-09-039

Dear Mr. Deremer:

Advice Letter 3878 is effective July 31, 2008.

Sincerely,

Kenneth Lewis, Acting Director

Energy Division





July 1, 2008

Ken Deremer
Director
Tariffs & Regulatory Accounts

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Advice No. 3878 (U 904 G)

Public Utilities Commission of the State of California

Subject: Report on Backbone Transmission and Slack Capacity in Compliance with Decision (D.) 06-09-039

Southern California Gas Company (SoCalGas) hereby submits for filing its report to demonstrate that it holds adequate backbone transmission capacity and has slack capacity consistent with its proposals in the Gas Market Rulemaking (R.04-01-025).

Purpose

This Advice Letter complies with Ordering Paragraph (OP) 3 of D.06-09-039 which states:

3. The Pacific Gas and Electric Company and the Southern California Gas Company shall demonstrate in biennial advice letter filings to the Commission's Energy Division starting 2008 that they hold adequate backbone transmission capacity and have slack capacity consistent with their proposals presented herein. The first filing is due July 1, 2008.

Background

In response to reports and ongoing changes in the natural gas market which indicated that there may not be sufficient natural gas supplies or infrastructure to meet the long-term needs of the state's residential and business customers, the Commission initiated R.04-01-025. In the Assigned Commissioner's Scoping Memo of February 28, 2005, the Commission identified the following question for consideration in Phase 2 of this proceeding.¹

Can the California gas utilities' existing infrastructure and operations adequately protect California from short-term or long-term natural gas shortages caused by the interruptions in natural gas supply?

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¹ Phase 1 of this proceeding was limited to issues related to the utilities' acquisition of interstate capacity and was resolved in D.04-09-022.

Most of the natural gas transported via the interstate pipelines, as well as some of the California produced natural gas, is delivered into PG&E and SoCalGas intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" natural gas pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or natural gas storage fields.

In D.06-09-039, the Commission determined that it was, "comfortable with the total amount of firm backbone transmission capacity on both the PG&E and SoCalGas systems." In an effort to continue to monitor the sufficient level of backbone capacity on the PG&E and SoCalGas systems, the Commission also required PG&E and SoCalGas to demonstrate in advice letter filings with the Commission's Energy Division that they hold adequate backbone transmission capacity. These advice letter filings shall be made on a biennial basis, beginning July 1, 2008.

<u>Information</u>

In R.04-01-025, SoCalGas presented to the Commission that it held a 49% annual reserve margin at the time and that, historically, its reserve margins have been between 40%-50%. ⁴ Table 1 below illustrates that SoCalGas expects to hold a Reserve Margin of 47% in 2009 and 2010 and to retain a reserve margin of at least 45% through 2017.

Table 1⁵
SoCalGas Reserve Margin
One- in-Ten-Year Cold and Dry-Hydroelectric Condition

	Annual Average	
	Daily Demand	Reserve
Year	(MMcfd)	Margin
2009	2,642	47%
2010	2,639	47%
2011	2,624	48%
2012	2,630	47%
2013	2,631	47%
2014	2,632	47%
2015	2,636	47%
2016	2,640	47%
2017	2,666	45%
2018	2,662	46%
2019	2,671	45%
2020	2,677	45%
2021	2,721	42%
2022	2,786	39%
2023	2,797	39%

² D.06-09-039, Finding of Fact 12.

³ D.06-09-039, page 27.

⁴ D.06-09-039, FOF 8. The Reserve Margin of backbone capacity in excess of demand on the SoCalGas system is derived by the formula: Reserve Margin = (Firm Daily Receipt Capacity – Average Daily Demand)/ Average Daily Demand.

⁵ Demand source: 2009 BCAP forecast for years 2009-2011, extended through 2023. Reserve margin relative to existing SoCalGas receipt capacity of 3,875 MMcfd

Attachment B further illustrates that SoCalGas continues to hold adequate backbone transmission capacity. Therefore, SoCalGas confirms that it holds adequate backbone transmission capacity and has a reserve margin on backbone capacity consistent with SoCalGas' proposals in Phase 2 of R.04-01-025.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date this Advice Letter. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division Attn: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Maria Salinas (mas@cpuc.ca.gov) and to Honesto Gatchalian (inj@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Sid Newsom Tariff Manager - GT14D6 555 West Fifth Street Los Angeles, CA 90013-1011 Facsimile No. (213) 244-4957

E-mail: snewsom@SempraUtilities.com

Effective Date

SoCalGas believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B and respectfully requests that this become effective July 31, 2008 which is 30 calendar days after the date filed.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A which includes parties in R.04-01-025, Gas Market OIR.

KEN DEREMER
Director
Tariffs and Regulatory Accounts

Attachment

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)			
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904-G)			
Jtility type: Contact Person: <u>Sid Newsom</u>			
☐ ELC ☐ GAS Pho	Phone #: (213) <u>244-2846</u>		
PLC HEAT WATER E-m	TER E-mail: snewsom@semprautilities.com		
EXPLANATION OF UTILITY TYPE	(Date Filed/ Received Stamp by CPUC)		
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATE	R = Water		
Advice Letter (AL) #: 3878			
Subject of AL: Report on Backbone and Slack Capacity			
Keywords (choose from CPUC listing): Transmission Capacity			
AL filing type: Monthly Quarterly Annual One-Time Other Biennial			
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D06-09-039			
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No			
Summarize differences between the AL and the prior withdrawn or rejected AL ¹ :N/A			
Does AL request confidential treatment? If so, provide explanation: No			
Resolution Required? Yes No	Tier Designation: 1 2 3		
Requested effective date: 7/31/08	No. of tariff sheets: <u>0</u>		
Estimated system annual revenue effect: (%): None			
Estimated system average rate effect (%): None			
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).			
Tariff schedules affected: None			
Service affected and changes proposed ¹ : N/A			
Pending advice letters that revise the same tariff sheets: None			
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:			
CPUC, Energy Division Southern California Gas Company			
Attention: Tariff Unit	Attention: Sid Newsom		
505 Van Ness Ave. San Francisco, CA 94102	555 West Fifth Street, GT14D6 Los Angeles, CA 90013-1011		
mas@cpuc.ca.gov and jnj@cpuc.ca.gov	snewsom@semprautilities.com		

 $^{^{\}scriptscriptstyle 1}$ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 3878

(See Attached Service Lists)

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ATTACHMENT B

Advice No. 3878

Projected Demand with SoCalGas' Firm Backbone Receipt Capacity

Projected Demand with SoCalGas' Firm Backbone Receipt Capacity

