PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

September 9, 2009



Advice Letter 4009

Ronald van der Leeden, Director Rates, Revenues and Tariffs 8330 Century Park Court CP32C San Diego, CA 92123-1548

Subject: Modification of Schedule No. G-TBS, Transaction Based Storage Service, Pursuant to D.08-12-020

Dear Mr. van der Leeden:

Advice Letter 4009 is effective September 6, 2009.

Sincerely,

Julie A. Fitch, Director Energy Division

Jen A. Jes





Ronald van der Leeden Director Rates, Revenues & Tariffs

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August 7, 2009

Advice No. 4009 (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Modification of Schedule No. G-TBS, Transaction Based Storage Service, Pursuant to Decision (D.) 08-12-020

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) minor revisions to its Schedule No. G-TBS, Transaction Based Storage Service, applicable throughout its service territory, as shown on Attachment B.

Purpose

This Advice Letter revises, in compliance with D.08-12-020, Special Condition 20 of SoCalGas' current and effective Schedule No. G-TBS.

Background

On December 4, 2008, the Commission issued D.08-12-020 approving the August 22, 2008 Joint Motion For Adoption of Settlement Agreement and Immediate Suspension of Briefing Schedule for Phase One Issues¹.

The Settlement Agreement (SA) appended to the August 22, 2008 Joint Motion, mentioned above, requires SoCalGas to allocate certain amounts of unbundled storage capacities to Southwest Gas Corporation (SWG) and the City of Long Beach (Long Beach) for their core customer requirements. Sections II.13 and II.14 of the SA provide as follows:

13. SWG shall be allocated storage capacity from the unbundled storage program at the same rates included in this SA for the combined core customers of SDG&E/SoCalGas upon approval of this SA by the Commission, as revised in future cost allocation proceedings (BCAP or TCAP) to reflect new embedded costs. Initially, upon approval of this SA by the Commission, SWG shall be allocated 1.98% of the storage capacities (injection, inventory, and withdrawal) allocated to the combined core customers of SDG&E/SoCalGas in this SA. If, however, SWG's

¹ D.08-12-020, Ordering Paragraph 1, p. 34

core load or portion of core load is directly served under an agreement between Pacific Gas and Electric Company and SWG during the term of this SA, SWG's percentage of storage capacity set-asides will be adjusted not earlier than April 1 of the subsequent year to reflect the ratio of SWG's core load served by SoCalGas and the capacities allocated to the combined core customers of SDG&E/SoCalGas. SWG will have the option to reduce its commitment in each future BCAP or TCAP cycle during the settlement period.

14. Long Beach shall be allocated storage capacity from the unbundled storage program at the same rates included in this SA for the combined core customers of SDG&E and SoCalGas as revised in future cost allocation proceedings (BCAP or TCAP) to reflect new embedded costs. Initially, upon approval of this SA by the Commission, Long Beach shall be allocated storage inventory capacity of 0.635 Bcf, storage injection capacity of 2.9 MMcfd, and storage withdrawal capacity of 31.6 MMcfd. On April 1, 2012, Long Beach may increase its allocated storage capacities to 0.700 Bcf of inventory, 3.3 MMcfd of injection capacity and 36 MMcfd of withdrawal capacity. Long Beach may reduce its allocated storage capacities in each future BCAP or TCAP during the settlement period.

The proposed revisions to Special Condition 20 of Schedule No. G-TBS are needed to make the tariff consistent with the provisions in D.08-12-020 requiring allocations of unbundled storage capacity to SWG and Long Beach.

Requested Tariff Change

Special Condition 20 of Schedule No. G-TBS will now read:

Allocations for Wholesale Customers

20. The Utility will allocate unbundled storage capacities to the City of Long Beach and Southwest Gas in a manner consistent with D.08-12-020 and any applicable CPUC decisions relating to storage allocations to these customers.

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 (ini@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 this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this Advice Letter be approved on September 6, 2009, 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 A.08-02-001, 2009 BCAP proceeding.

Ronald van der Leeden
Director
Rates, Revenues & Tariffs

Attachments

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 904G)				
Utility type:	Contact Person: <u>Sid Newsom</u>			
☐ ELC ☐ GAS	Phone #: (213) <u>244-2846</u>			
☐ PLC ☐ HEAT ☐ WATER	E-mail: SNewsom@semprautilities.com			
EXPLANATION OF UTILITY TY	EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)			
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat V	/ATER = Water			
Advice Letter (AL) #: 4009				
Subject of AL: <u>Modification of Sche</u>	dule No. G-TBS, T	ransaction Based Storage Service,		
Pursuant to D.08-12-020				
Keywords (choose from CPUC listing)	: Storage, Agreen	nents		
AL filing type: Monthly Quarter	rly 🗌 Annual 🛛 C	One-Time Other		
If AL filed in compliance with a Comm	nission order, indi	cate relevant Decision/Resolution #:		
D.08-12-020				
Does AL replace a withdrawn or reject	cted AL? If so, idea	ntify the prior AL <u>No</u>		
Summarize differences between the A	AL and the prior wi	ithdrawn or rejected AL¹: <u>N/A</u>		
Does AL request confidential treatment? If so, provide explanation: No.				
Resolution Required? \square Yes \boxtimes No		Tier Designation: 1 2 2 3		
Requested effective date: 9/6/09 No. of tariff sheets: 3		No. of tariff sheets: <u>3</u>		
Estimated system annual revenue eff	fect: (%): <u>N/A</u>			
Estimated system average rate effect	(%): <u>N/A</u>			
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: <u>G-TBS and TOCs</u>				
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 505 Van Ness Ave.,		Attention: Sid Newsom 555 West 5 th Street, GT14D6		
San Francisco, CA 94102		os Angeles, CA 90013-1011		
mas@cpuc.ca.gov and jnj@cpuc.ca.gov		SNewsom@semprautilities.com		

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

ATTACHMENT A

Advice No. 4009

(See Attached Service Lists)

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ATTACHMENT B Advice No. 4009

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 44933-G	Schedule No. G-TBS, TRANSACTION BASED STORAGE SERVICE, Sheet 6	Revised 43344-G
Revised 44934-G	TABLE OF CONTENTS	Revised 44864-G
Revised 44935-G	TABLE OF CONTENTS	Revised 44897-G

LOS ANGELES, CALIFORNIA CANCELING

Revised Revised CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

44933-G 43344-G

Schedule No. G-TBS TRANSACTION BASED STORAGE SERVICE

Sheet 6

(Continued)

SPECIAL CONDITIONS (Continued)

Storage Open Season

15. The Utility may also sell G-TBS storage using various forms of storage open seasons, including auctions and individual negotiations.

Posting Requirements

- 16. The Utility will post all G-TBS storage transactions on its EBB within one business day of execution, including the counterparty name, quantity of storage services contracted on an unbundled basis, contract prices, and contract term.
- 17. Given that the value of storage services are highly dynamic, and can change not only daily, but even hourly, the Utility is not required to offer posted prices or contract terms to any other customers. The Utility will meet and confer with any market participant regarding why it did not offer them the same prices and contract terms as other posted transactions. If, after such a meet and confer session, any market participant is not satisfied with the Utility's explanation, they may petition the CPUC, pursuant to Section I of Rule No. 4, to require the Utility to offer them the same prices and contract terms as other posted transactions, and the Utility may oppose such petition.
- 18. The Utility shall post on its EBB as soon as practicable prior to each nomination cycle the injection and withdrawal capacity of its storage system. The Utility shall post on its EBB the aggregate scheduled injection and withdrawal amounts for the completed gas flow day.

Firm Inventory

19. Zero-priced, lowest-priority, interruptible injection and withdrawal service shall be included with all sales of inventory, whether that inventory is sold on a stand-alone or package basis.

Allocations for Wholesale Customers

20. The Utility will allocate unbundled storage capacities to the City of Long Beach and Southwest Gas in a manner consistent with D.08-12-020 and any applicable CPUC decisions relating to storage allocations to these customers.

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4009 DECISION NO. 08-12-020

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ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Aug 7, 2009 DATE FILED Sep 6, 2009 **EFFECTIVE**

RESOLUTION NO.

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LOS ANGELES, CALIFORNIA CANCELING Revised

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(TO BE INSERTED BY UTILITY)

ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Aug 7, 2009 DATE FILED Sep 6, 2009 **EFFECTIVE** RESOLUTION NO.

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TABLE OF CONTENTS

The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

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(Continued)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 4009 \\ \text{DECISION NO.} & 08\text{-}12\text{-}020 \\ \end{array}$

ISSUED BY
Lee Schavrien
Senior Vice President
Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & Aug \ 7, \ 2009 \\ \text{EFFECTIVE} & Sep \ 6, \ 2009 \\ \text{RESOLUTION NO.} \end{array}$