

PUBLIC UTILITIES COMMISSION

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April 29, 2010

Advice Letter 4093

Ronald van der Leeden, Director
Rates, Revenues and Tariffs
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

**Subject: Proposed Reductions to SoCalGas/SDG&E Interstate Capacity
Minimums for September and October 2010**

Dear Mr. van der Leeden:

Advice Letter 4093 is effective April 28, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



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March 29, 2010

Advice No. 4093
(U 904 G)

Public Utilities Commission of the State of California

Subject: Proposed Reductions to SoCalGas/SDG&E Interstate Capacity Minimums for September and October 2010

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) hereby submit for approval by the California Public Utilities Commission (Commission) proposed temporary reductions to the firm interstate capacity minimums established by the Commission for SoCalGas and SDG&E in Decision (D.) 04-09-022.

Purpose

Pursuant to Conclusion of Law No. 6 of D.04-09-022,¹ SoCalGas and SDG&E propose a temporary reduction of the minimum firm interstate capacity requirement for SoCalGas and SDG&E from 997 MDth/d to 800 MDth/d. This reduction would only be effective for September and October of 2010, and is being proposed to help avoid stranded capacity that would otherwise result from Line 3000 maintenance that will be taking place during these two months.

Background

In D.04-09-022, the Commission established a firm interstate capacity planning range for SoCalGas and SDG&E with a lower bound set at 100% of forecasted annual average core procurement demand and an upper bound of 120% of forecasted annual average core procurement demand.² SoCalGas and SDG&E were also given the flexibility to reduce their firm interstate pipeline capacity holdings during spring and summer months to no less than 90% of forecasted annual average core procurement demand.³ In response to Advice No. (AL) 3969, the Commission eliminated the 100% annual average minimum requirement.⁴ SoCalGas' and SDG&E's firm interstate pipeline holdings must now be no less than 90% of forecasted annual average core procurement demand in spring and summer months, and no less than 100% of

¹ This Conclusion of Law provides that the capacity ranges adopted by the Commission in D.04-09-022 "should be revisited in the utilities' respective BCAPs or through the advice letter process for possible adjustment." D.04-09-022, mimeo., at 90.

² D.04-09-022, mimeo., at 85 (Finding of Fact No. 85), 92 (Ordering Paragraph Nos. 1 and 2).

³ D.04-09-022, mimeo., at 31 (Fn. No. 11).

⁴ AL 3969 was approved by the Commission on April 3, 2009.

forecasted annual average core procurement demand in fall and winter months.⁵ The 2010-2011 minimum firm interstate capacity requirement for SoCalGas and SDG&E is 997 MDth/d for non-winter months and 1,108 MDth/d for winter months.

SoCalGas currently holds 246 MDth/d of El Paso capacity to Topock that expires on August 31, 2010. SoCalGas also holds 81 MDth/d of El Paso capacity to Ehrenberg that expires on August 31, 2010. As a result of these contract expirations, SoCalGas' and SDG&E's contracted firm interstate capacity will drop from 1,030 MDth/d in August to 703 MDth/d in September and October unless additional firm interstate capacity is acquired. SoCalGas and SDG&E are in the process of exploring options for meeting their minimum capacity requirements on terms as favorable as possible to core customers. SoCalGas and SDG&E have issued a request for proposals for capacity and are in discussions with potential counterparties. SoCalGas and SDG&E anticipate that, to some extent, they will be able to replace a portion of the expiring El Paso Topock capacity with capacity to other SoCalGas receipt points. However, they wish to minimize the over \$4 million in stranded costs associated with capacity to Topock during the maintenance period described below.

Proposed Temporary Reductions in Interstate Capacity Minimums

On March 4, 2010, SoCalGas' System Operator issued an Envoy notice informing shippers that the Topock receipt point with El Paso will not be available from August 30, 2010 through October 24, 2010, due to a planned retrofit of Line 3000. In order to be in compliance with DOT requirements, specifically 49 CFR 192 Subpart O, SoCalGas is required to complete in-line inspections. Performance of the in-line inspections will require SoCalGas to remove the line from service and perform a series of retrofits and pigging operations. As a result, capacity attempting to deliver into the SoCalGas Topock delivery point will be stranded for that period.

SoCalGas and SDG&E believe that they will be able to purchase any additional gas supplies needed to meet core needs during September and October at reasonable prices at the California border. SoCalGas and SDG&E have moved their Topock firm access rights to Needles and Ehrenberg for September and October in order to be in position to buy California Border gas during those months if needed.

Relief Requested

To avoid the stranded capacity costs that SoCalGas and SDG&E core procurement customers would otherwise incur if SoCalGas and SDG&E were required to meet the current 997 MDth/d minimum firm interstate capacity requirement, SoCalGas and SDG&E respectfully request that the Commission reduce their minimum firm interstate requirement to 800 MDth/d for September and October 2010. Although there is always a possibility the SoCalGas maintenance at Topock could continue past October, Envoy postings currently indicate that the work will be completed by October 24, and therefore SoCalGas and SDG&E are not requesting a reduction in their minimum firm interstate capacity requirements beyond October at this time.

SoCalGas and SDG&E have consulted with DRA and TURN regarding this proposed reduction in core minimum firm interstate capacity requirements in September and October 2010 and its potential effect, if any, on the ability of SoCalGas to meet its October 31, 2010 storage target. SoCalGas and SDG&E have also discussed what effect, if any, the capacity reduction should

⁵ In AL 3969, the terms spring/summer and fall/winter are used interchangeably with the terms non-winter and winter. In D.04-09-022, winter is defined as the five month period of November through March; non-winter is the seven month period April through October.

have on the July 31 target that will be agreed upon by SoCalGas, DRA, and TURN, and that SoCalGas commits to meeting. SoCalGas and SDG&E have been authorized to state that DRA and TURN support this proposed temporary reduction in core minimum firm interstate capacity requirements.

This filing will not create any deviations from SoCalGas' and SDG&E's tariffs, cause withdrawal of service from any present customer, or impose any more or less restrictive conditions.

Protests

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 received within 20 days of the date of 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 (jni@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
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Attn: T. Peacock
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555 West Fifth Street
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E-Mail: tpeacock@semprautilities.com

Effective Date

SoCalGas believes that this filing is subject to Energy Division disposition, and therefore respectively requests that this advice letter be approved April 28, 2010, which is 30 calendar days after the date filed.

Notice

A copy of this advice letter is being sent to all parties listed on Attachment A, which includes the interested parties in Rulemaking 04-01-025.

Ronald van der Leeden
Director
Rates, Revenues & Tariffs

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:

ELC GAS
 PLC HEAT WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: SNewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 4093

Subject of AL: Proposed Reductions to SoCalGas/SDG&E Interstate Capacity Minimums for September and October 2010

Keywords (choose from CPUC listing): Capacity

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.04-09-022

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 AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: April 28, 2010

No. of tariff sheets: 0

Estimated system annual revenue effect (%): _____

Estimated system average rate effect (%): _____

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 proposed¹: NA

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

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

Southern California Gas Company

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¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4093

(See Attached Service Lists)

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