#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

November 3, 2010



## **Advice Letter 4148**

Rasha Prince, Director Regulatory Affairs Southern California Gas 555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011

Subject: Revision to Rule No. 41, Utility System Operation

Dear Ms. Prince:

Advice Letter 4148 is effective October 15, 2010.

Sincerely,

Julie A. Fitch, Director Energy Division

Jen A. Jes



Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011 Tel: 213.244.5141 Fax: 213.244.4957

RPrince@semprautilities.com

September 15, 2010

Advice No. 4148 (U 904 G)

Public Utilities Commission of the State of California

Subject: Revision to Rule No. 41, Utility System Operation

Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) revisions to its tariff Rule No. 41, applicable throughout its service territory, as shown on Attachment B.

#### Proposed Revision to Rule No. 41

This filing requests Commission approval to revise: 1) Section 2 of Rule No. 41 to reflect departmental name changes resulting from a recent reorganization; and 2) Section 13 of Rule No. 41 by changing certain references used in describing standards and criteria for spot purchases or sales of gas commodity for which standards and criteria are not specified in CPUC-approved contracts. Specifically, SoCalGas requests that the references to: 1) "Platt's Gas Daily Midpoint" be changed to the "ICE (Intercontinental Exchange) Wtd Avg Index," 2) "Platt's Gas Daily high of the Common range" be changed to "ICE High," and 3) "Platt's Gas Daily low of the Common range" be changed to "ICE Low." The red-lined version of the proposed changes is shown in Attachment C.

This proposed revision to Section 13 is to use publicly available data that does not require customers to obtain data licenses from any individual publisher. SoCalGas proposes to switch from the existing Platts references to substantially similar gas pricing references published by the ICE.

#### **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 of this Advice Letter, which is October 5, 2010. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is given below.

CPUC Energy Division Attention: 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 (<a href="mas@cpuc.ca.gov">mas@cpuc.ca.gov</a>) and Honesto Gatchalian (<a href="mail@cpuc.ca.gov">jni@cpuc.ca.gov</a>) of the Energy Division. A copy of the protest should also be sent via both e-mail <a href="mail@and">and</a> 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: <a href="mailto:snewsom@SempraUtilities.com">snewsom@SempraUtilities.com</a>

#### **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. SoCalGas respectfully requests that this filing be approved on October 15, 2010, which is 30 calendar days from the date filed.

#### **Notice**

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties to A.08-02-001, 2009 BCAP.

Rasha Prince
Director- Regulatory Affairs

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:	y type: Contact Person: <u>Sid Newsom</u>					
☐ ELC ☐ GAS	Phone #: (213) <u>244-2846</u>					
☐ PLC ☐ HEAT ☐ WATER	ER E-mail: SNewsom@semprautilities.com					
EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)						
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat V	VATER = Water					
Advice Letter (AL) #: 4148						
Subject of AL: <u>Revision to Rule No.</u>	41. Utility System	Operation				
Keywords (choose from CPUC listing)	: Rules					
AL filing type:   Monthly  Quarter	rly 🗌 Annual 🛛 C	One-Time 🗌 Other				
If AL filed in compliance with a Comr	nission order, indi	cate relevant Decision/Resolution #:				
Does AL replace a withdrawn or reject	cted AL? If so, iden	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 treatme	nt? If so, provide e	explanation: No				
Resolution Required? $\square$ Yes $\boxtimes$ No		Tier Designation: $\square$ 1 $\boxtimes$ 2 $\square$ 3				
Requested effective date: <u>10/15/10</u>		No. of tariff sheets: <u>4</u>				
Estimated system annual revenue effect: (%): N/A						
Estimated system average rate effect (%):N/A						
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: Rule No. 41, TOCs						
Service affected and changes proposed <sup>1</sup> :						
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 655 West 5 <sup>th</sup> Street, GT14D6				
San Francisco, CA 94102		Los Angeles, CA 90013-1011				
		SNewsom@semprautilities.com				

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

## **ATTACHMENT A**

## Advice No. 4148

(See Attached Service Lists)

Alcantar & Kahl Seema Srinivasan sls@a-klaw.com

Alcantar & Kahl, LLP Mike Cade wmc@a-klaw.com

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**California Energy Commission** Randy Roesser rroesser@energy.state.ca.us

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Barkovich & Yap Catherine E. Yap ceyap@earthlink.net

**CPUC** 

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**CPUC - DRA** 

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CALIFORNIA COGENERATION COUNCIL BETH VAUGHAN beth@beth411.com

### ATTACHMENT B Advice No. 4148

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 46410-G	RULE NO. 41, UTILITY SYSTEM OPERATION, Sheet 1	Original 45399-G
Revised 46411-G	RULE NO. 41, UTILITY SYSTEM OPERATION, Sheet 5	Original 45403-G
Revised 46412-G	TABLE OF CONTENTS	Revised 46273-G
Revised 46413-G	TABLE OF CONTENTS	Revised 46409-G

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

46410-G 46271-G

# Rule No. 41 <u>UTILITY SYSTEM OPERATION</u>

Sheet 1

The Utility's operational organization, procedures, and reporting requirements are described herein.

#### STRUCTURE, PROCEDURES, AND PROTOCOLS

- 1. The mission of the Utility System Operator is to maintain system reliability and integrity while minimizing costs at all times.
- 2. The term "Utility System Operator" as defined in Rule No.1 denotes all of the applicable departments within Southern California Gas Company and San Diego Gas & Electric Company responsible for the physical and commercial operation of the pipeline and storage systems specifically excluding the Utility Gas Procurement Department. The Utility System Operator's organizational structure is described below.

The daily overall physical transmission and storage system reliability operations within the Utility System Operator are conducted by the Transmission & System Operations Department, which is located in the Field Services organization. The Transmission & System Operations Department contains the Gas Control Department and the Gas Scheduling Department. The activities involved in meeting any physical flowing gas supply requirements as determined by the Gas Control Department are conducted by the Operational Hub, which is located in the Storage and Hub Products Department within the Energy Markets and Capacity Products Department. The Energy Markets and Capacity Products Department is located in the Engineering & Operations Staff organization. The Field Services and Engineering & Operations Staff organizations report to different Vice Presidents.

- 3. The Gas Control Department is the sole authority for: operating the pipeline and storage system, developing the system sendout (i.e., demand) forecasts to be used for purposes of determining on a daily basis Southern System minimum flow requirements, and for issuing Operational Flow Orders ("OFOs").
- 4. The Gas Control Department will fully utilize storage injection capacity prior to issuing an OFO. The Gas Control Department is responsible for calculating forecasted sendout and physical storage injection capacity. For every nomination cycle, the Gas Scheduling Department shall calculate the system capacity as the sum of forecasted sendout, physical storage injection capacity, and available off-system nominations. "Available" off-system nominations are the nominations that have been made by customers and in the SoCalGas scheduling system. The forecasted system capacity shall then be compared to the latest scheduled quantities. The following table summarizes which quantities are used in each cycle for the OFO calculation:

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4148 DECISION NO.

1H15

ISSUED BY
Lee Schavrien
Senior Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
DATE FILED Sep 15, 2010
EFFECTIVE Oct 15, 2010
RESOLUTION NO.

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T T LOS ANGELES, CALIFORNIA CANCELING

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

46411-G 45403-G

#### Rule No. 41 UTILITY SYSTEM OPERATION

Sheet 5

(Continued)

#### PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES (Continued)

- 12. The Utility Gas Procurement Department will act on a best-efforts basis to provide gas supplies based on the Operational Hub's request if called upon as a provider of last resort. "Provider of last resort" relates to the circumstance in which the Operational Hub has attempted to use all other available tools, has entered the open market for gas commodity purchases, has been unsuccessful in meeting its need to receive a required volume of flowing supplies at a specific location, and system reliability is therefore jeopardized. If the Operational Hub has exhausted its other options available to acquire the required flowing supplies, it will contact the Utility Gas Procurement Department and request that it provide gas to meet the remaining minimum flow requirement. Such requests will occur as soon as possible during the actual flow day. The Utility Gas Procurement Department will charge the Operational Hub the actual incremental costs incurred to provide the specific supplies. Verification that the Utility has followed this procedure will be included in the annual compliance report provided to the CPUC in conjunction with the Advice Letter addressed in Section 23 below.
- 13. Standards and criteria for spot purchases or sales of gas commodity for which standards and criteria are not specified in CPUC-approved contracts shall be as follows:
  - a. Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the day-ahead market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the ICE Wtd Avg Index for the flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the ICE Wtd Avg Index for the flow date for the relevant trading point.
  - Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the intraday market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the ICE High for the current flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the ICE Low for the current flow date for the relevant trading point.

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4148 DECISION NO.

5H9

ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Sep 15, 2010 DATE FILED Oct 15, 2010 **EFFECTIVE** RESOLUTION NO.

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46412-G 46273-G

LOS ANGELES, CALIFORNIA CANCELING

Revised

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#### (Continued)

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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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Part II Summary of Rates and Charges
Part III Cost Allocation and Revenue Requirement 45267-G,45268-G,45269-G,45613-G,45614-G
Part IV Income Tax Component of Contributions and Advances
Part V Balancing Accounts
Description and Listing of Balancing Accounts 46057-G Purchased Gas Account (PGA) 45754-G,45755-G Core Fixed Cost Account (CFCA) 45273-G,45274-G Noncore Fixed Cost Account (NFCA) 45275-G,45276-G Enhanced Oil Recovery Account (EORA) 45277-G Noncore Storage Balancing Account (NSBA) 44191-G,44192-G California Alternate Rates for Energy Account (CAREA) 45882-G,45883-G Hazardous Substance Cost Recovery Account (HSCRA) 40875-G, 40876-G,40877-G Gas Cost Rewards and Penalties Account (GCRPA) 40881-G Pension Balancing Account (PBA) 45013-G,45014-G Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA) 45015-G,45016-G Conservation Expense Account (CEA) 40886-G,40887-G

(Continued)

 $\begin{array}{ll} \mbox{(TO BE INSERTED BY UTILITY)} \\ \mbox{ADVICE LETTER NO.} & 4148 \\ \mbox{DECISION NO.} \end{array}$ 

ISSUED BY
Lee Schavrien
Senior Vice President
Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & \underline{Sep~15,~2010} \\ \text{EFFECTIVE} & \underline{Oct~15,~2010} \\ \text{RESOLUTION NO.} \end{array}$ 

## **ATTACHMENT C**

## Advice No. 4148

**Redline Version of Rule No. 41** 

#### RULE NO. 41 [9-14-10 DRAFT] UTILITY SYSTEM OPERATION

Sheet 1

The Utility's operational organization, procedures, and reporting requirements are described herein.

#### STRUCTURE, PROCEDURES, AND PROTOCOLS

- 1. The mission of the Utility System Operator is to maintain system reliability and integrity while minimizing costs at all times.
- 2. The term "Utility System Operator" as defined in Rule No.1 denotes all of the applicable departments within Southern California Gas Company and San Diego Gas & Electric Company responsible for the physical and commercial operation of the pipeline and storage systems specifically excluding the Utility Gas Procurement Department. The Utility System Operator's organizational structure is described below.

The daily overall physical transmission and storage system reliability operations within the Utility System Operator are conducted by the Gas Transmission & System Operations Department, which is located in the Gas Operations Field Services organization. The Gas Transmission & System Operations Department contains the Gas Control Department and the Gas Scheduling Department. The activities involved in meeting any physical flowing gas supply requirements as determined by the Gas Control Department are conducted by the Operational Hub, which is located in the Storage and Hub Products Department within the Energy Markets and Capacity Products Department. The Energy Markets and Capacity Products Department is located in the Customer Services Engineering & Operations Staff organization. The Gas Operations Field Services and Customer Services Engineering & Operations Staff organizations report to different Vice Presidents.

- 3. The Gas Control Department is the sole authority for: operating the pipeline and storage system, developing the system sendout (i.e., demand) forecasts to be used for purposes of determining on a daily basis Southern System minimum flow requirements, and for issuing Operational Flow Orders ("OFOs").
- 4. The Gas Control Department will fully utilize storage injection capacity prior to issuing an OFO. The Gas Control Department is responsible for calculating forecasted sendout and physical storage injection capacity. For every nomination cycle, the Gas Scheduling Department shall calculate the system capacity as the sum of forecasted sendout, physical storage injection capacity, and available off-system nominations. "Available" off-system nominations are the nominations that have been made by customers and in the SoCalGas scheduling system. The forecasted system capacity shall then be compared to the latest scheduled quantities. The following table summarizes which quantities are used in each cycle for the OFO calculation:

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(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4139 DECISION NO. 09-11-006

1C0

ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Jul 28, 2010 DATE FILED Sep 1, 2010 **EFFECTIVE** RESOLUTION NO.

LOS ANGELES, CALIFORNIA CANCELING

Original

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

45403-G

#### RULE NO. 41 [9-14-10 DRAFT] UTILITY SYSTEM OPERATION

Sheet 5

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(Continued)

#### PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES (Continued)

- 12. The Utility Gas Procurement Department will act on a best-efforts basis to provide gas supplies based on the Operational Hub's request if called upon as a provider of last resort. "Provider of last resort" relates to the circumstance in which the Operational Hub has attempted to use all other available tools, has entered the open market for gas commodity purchases, has been unsuccessful in meeting its need to receive a required volume of flowing supplies at a specific location, and system reliability is therefore jeopardized. If the Operational Hub has exhausted its other options available to acquire the required flowing supplies, it will contact the Utility Gas Procurement Department and request that it provide gas to meet the remaining minimum flow requirement. Such requests will occur as soon as possible during the actual flow day. The Utility Gas Procurement Department will charge the Operational Hub the actual incremental costs incurred to provide the specific supplies. Verification that the Utility has followed this procedure will be included in the annual compliance report provided to the CPUC in conjunction with the Advice Letter addressed in Section 23 below.
- 13. Standards and criteria for spot purchases or sales of gas commodity for which standards and criteria are not specified in CPUC-approved contracts shall be as follows:
  - a. Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the day-ahead market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the Platt's Gas Daily MidpointICE Wtd Avg Index for the flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the Platt's Gas Daily MidpointICE Wtd Avg Index for the flow date for the relevant trading point.
  - b. Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the intraday market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the Platt's Gas DailyICE hHigh of the Common range for the current flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the Platt's Gas DailyICE ILow of the Common range for the current flow date for the relevant trading point.

(Continued)

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 4047
DECISION NO. 09-11-006

ISSUED BY
Lee Schavrien
Senior Vice President
Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & \underline{Dec~8,~2009} \\ \text{EFFECTIVE} & \underline{Feb~1,~2010} \\ \text{RESOLUTION NO.} \end{array}$