

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 26, 2011

Advice Letter 4153-A

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

**Subject: Supplemental – Annual Compliance Report on Utility System
Operator’s Southern System Reliability Purchases and Sales**

Dear Ms. Prince:

Advice Letter 4153-A is effective August 18, 2011 per Resolution G-3462.

Sincerely,

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

Julie A. Fitch, Director
Energy Division



Rasha Prince
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December 16, 2010

Advice No. 4153-A
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Supplemental - Annual Compliance Report on Utility System Operator's
Southern System Reliability Purchases and Sales**

Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) the Annual Compliance Report (ACR) demonstrating that activities to maintain Southern System reliability from April 1, 2009 through August 31, 2010 were in compliance with the standards, criteria and procedures described in Sections 9 through 17 of SoCalGas Rule No. 41.

Purpose

This Supplemental Advice Letter (AL) replaces in its entirety and corrects the Tier assignment of AL 4153, filed September 30, 2010, which was inadvertently designated as Tier 2. The Settlement Agreement in Application (A.) 08-02-001, approved by Decision (D.) 09-11-006 requires a Commission Resolution (Tier 3 AL) approving the Annual Compliance Report.

The purpose of this Advice Letter (AL) is to comply with certain provisions of SoCalGas' 2009 BCAP Phase Two Settlement Agreement (see below); and to allow SoCalGas to recover all the transaction costs described herein in its customer transportation rates during year 2011.

Background

In Decision (D.) 09-11-006, the Commission adopted SoCalGas' 2009 BCAP Phase Two Settlement Agreement¹. Pursuant to Section II(B)(1) of the Settlement Agreement and as described in Section 23 of SoCalGas Rule No. 41², on October 1 of each year SoCalGas is required to provide the ACR demonstrating that the Operational Hub's gas procurement activities during the preceding twelve months ending August 31 were in compliance with the standards, criteria and procedures described in Sections 9 through 17 of Rule No. 41. The ACR must be submitted to the Energy Division by an AL, which will be subject to

¹ Appendix A of the June 2, 2009 Joint Motion of the Settlement Parties for Adoption of Settlement Agreement and Suspension of Hearing Schedule for Phase Two Issues.

² For details, please go to: <http://www.socalgas.com/regulatory/tariffs/tm2/pdf/41.pdf>.

comment or protest. Upon Energy Division's review and verification of the ACR and the Commission Resolution approving the ACR, all the transactions found reasonable by the Energy Division will be amortized in customer transportation rates over the following year. Since these standards, criteria and procedures apply to purchases and sales as of April 1, 2009³ and Rule No. 41 became effective only on February 1, 2010, this ACR is for the period April 1, 2009 through August 31, 2010. Therefore, all of the April 1, 2009 through August 31, 2010 transactions, which are found reasonable by the Energy Division will be amortized in customer transportation rates during the year 2011. The next (i.e., second) ACR for the period September 1, 2010 through August 31, 2011 will be filed by an AL on October 1, 2011.

Discussion

In total, from April 1, 2009 through August 31, 2010, SoCalGas spent \$2,173,063 to meet the Southern System minimum flow requirements. The breakdown of the spending by categories is summarized below.

| | <u>\$ Amount Spent</u> |
|--|-------------------------------|
| Baseload, Exchange Contracts approved by CPUC <i>(December 2009 –February 2010)</i> | 1,773,116 |
| Swing, Call-Option Contracts approved by CPUC <i>(September 2009-February 2010)</i> | 33,622 |
| Spot Purchases/Sales for Energy Div. Review <i>(July/ December 2009; January/August 2010)</i> | 366,325 |
| Total | 2,173,063* |

**Includes FAR charges of \$535,808.*

Most of the spending was associated with baseload, exchange contracts that were approved by the Commission.⁴ Over the December 2009 - February 2010 period, SoCalGas paid two suppliers (Occidental and Conoco) \$1,773,116 (including FAR charges) for 120,000 dth/day of firm baseload supplies. The details of these Commission-approved payments are provided in Exhibit 1 – Baseload, Exchange Contracts in Attachment B.

SoCalGas purchased 24,992 dth of swing, call-option supplies for a total cost of \$33,622 (with a fixed cost of \$22,200 and a one-day variable cost of \$11,422). The details of this Commission-approved supply (from Occidental) are provided in Exhibit 3⁵ - Swing, Call-Option Contracts in Attachment B. The call options under these contracts had to be exercised before Cycle 1. On several days SoCalGas did not become aware of a supply shortfall until Cycle 2; therefore, this particular supply option was used only on one day.

In total, SoCalGas had a net cost (purchase costs minus sales revenues) of only \$366,325 for 1,018,801 dth of spot supplies, which represents an average net cost of \$0.36/dth. SoCalGas purchased 50,000 dth of spot supplies on one July 2009 flow day for a net cost of \$12,500; 174,241 dth over two flow days in December 2009 for a net cost

³ See Section 16 of SoCalGas Rule No. 41.

⁴ Resolution G-3435 in response to AL 3976 and 3976-A.

⁵ There is no Exhibit 2.

of \$122,647; 60,000 dth over two flow days in January 2010 for a net cost of \$860, and 734,560 dth over seven flow days in August 2010 for a net cost of \$230,318. The details of these payments are shown in Exhibit 4 - July 2009 Spot Purchase / Sale, Exhibit 5 - December 2009 Spot Purchase / Sale, Exhibit 6 - January 2010 Spot Purchase / Sale, and Exhibit 7 - August 2010 Spot Purchase / Sale, all of which are in Attachment B. All of the purchased quantities were equal to or slightly less than the system reliability requests made by the Operator. These requests are posted, after the fact, on Envoy—as shown in Attachment C.

Of the spot market payments mentioned above, only \$19,139 (5% of the total \$366,325 net cost) were outside the target price ranges established in Section 13 of Rule No. 41 (see the highlighted transactions in the attached Exhibit 5 - December 2009 Spot Purchase/Sale and Exhibit 7 - August 2010 Spot Purchase/Sale). These payments, however, are still reasonable since they were made after consulting with at least three different suppliers consistent with the presumed-reasonableness parameters described in Section 14 of Rule No. 41.⁶

Protest

Anyone may protest this AL 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 AL, which is January 5, 2011. 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 (mas@cpuc.ca.gov) and Honesto Gatchalian (jnj@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

⁶ Evaluation of Rule No. 41 limits requires examination of Gas Daily prices and is, therefore, not included in the attached public exhibits. Any party using the Gas Daily price information must be an authorized licensee (or will have to purchase a license) of Platts Gas Daily. Energy Division personnel, who are either authorized licensees or are exempt from these licensing restrictions, can review and certify the transactions listed in the following Exhibits on behalf of the Commission and other interested parties. A confidential version of Exhibits 4-7 (Attachment D) with this information has been prepared for Energy Division staff.

Effective Date

The Settlement Agreement in A.08-02-001 approved by D.09-11-006 directed that this filing be classified as Tier 3 pursuant to GO 96-B. SoCalGas respectfully requests that this filing be approved on or before the Commission meeting of March 10, 2011.

Notice

A copy of this AL 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:

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) #: 4153-A

Subject of AL: Supplemental: Annual Compliance Report on Operational Hub's Procurement Activities

Keywords (choose from CPUC listing): Procurement

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

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

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: Yes, Attachment B is confidential as explained in the AL.

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 3/10/11

No. of tariff sheets: 0

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: None

Service affected and changes proposed¹: _____

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
Attention: Sid Newsom
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011
SNewsom@semprautilities.com**

¹ Discuss in AL if more space is needed.

ATTACHMENT A
Advice No. 4153-A

(See Attached Service Lists)

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Attachment B

Advice No. 4153-A

**Exhibits 1 and 3-7
Commission Approved Supplies and Payments**

Exhibit 1 - Baseload, Exchange Contracts

| | <u>Baseload</u> | <u>\$/Dth/day</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Total</u> |
|---------------|-----------------------|-------------------|------------------------|-----------------------------|---------------------------|--------------------|
| Oxy | 20,000 dth/day | 0.114 | \$70,680 | \$70,680 | \$63,840 | \$205,200 |
| | Shortfalls | 0.114 | \$37 | \$626 | \$14 | \$678 |
| | Net | | \$70,643 | \$70,054 | \$63,826 | \$204,522 |
| | | | | | | |
| Conoco | 100,000 dth/day | 0.12 | \$372,000 | \$372,000 | \$336,000 | \$1,080,000 |
| | Shortfalls | 0.12 | \$0 | \$453 | \$260 | \$713 |
| | Net | | \$372,000 | \$371,547 | \$335,740 | \$1,079,287 |
| | | | | | | |
| | Total Baseload | | \$442,643 | \$441,601 | \$399,566 | \$1,283,809 |
| | | | | | | |
| | | | | | | |
| | <u>FAR Charges:</u> | | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Total</u> |
| | | | <u>\$0.05/ dth</u> | <u>\$0.04284/ dth</u> | <u>\$0.04284/ dth</u> | |
| | Oxy | 20,000 dth/day | \$31,000 | \$26,561 | \$23,990 | \$81,551 |
| | Conoco | 100,000 dth/day | \$155,000 | \$132,804 | \$119,952 | \$407,756 |
| | | | \$186,000 | \$159,365 | \$143,942 | \$489,307 |
| | | | | | | |
| | | | | | | |
| | | | | Total Baseload + FAR | | \$1,773,116 |

Exhibit 3 - Swing, Call-Option Contracts

| | <u>Call Option</u> | <u>\$/Dth/day</u> | <u>Sept</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Total</u> |
|-------|--------------------|-------------------|-------------|------------|------------|------------|--------------|
| Fixed | 20,000 dth/day | 0.01 | \$4,200 | \$6,200 | \$6,200 | \$5,600 | \$22,200 |

Call Option exercised (called 12/08 but flow day was 12/10/2009)

| | | | | | | | |
|------------|-------|-----------------|--|--|--|--|----------|
| 4,992 dth | 0.335 | \$1,672 | | | | | |
| 20,000 dth | 0.425 | \$8,500 | | | | | |
| FAR | 0.05 | \$1,250 | | | | | |
| | | \$11,422 | | | | | \$11,422 |

| | | | | | | | |
|--------------------------|--|--|----------------|-----------------|----------------|----------------|-----------------|
| Total Call Option | | | \$4,200 | \$17,622 | \$6,200 | \$5,600 | \$33,622 |
|--------------------------|--|--|----------------|-----------------|----------------|----------------|-----------------|

Exhibit 4 - July 2009 Spot Purchase / Sale

Southern Systems Minimum Flow Purchase/Sale

| Notification Minimum Flow | | | PURCHASE | | | | SALE | | | | Net \$ |
|---------------------------|-----------|-------------------|------------|-----------------------|-------|----------|------------|-------------------|-------|----------|--------|
| Date notified | Flow Date | Amt needed (Dths) | Amt (Dths) | Purchase Price \$/dth | \$Amt | Co. Name | Amt (Dths) | Sale Price \$/dth | \$Amt | Co. Name | |

July Activity

| | | | | | | | | | | | | |
|---|---------|---------|--------|--------|--------|-----------|--------------------------------------|--------|--------------------------|-----------|--------------|-----------------|
| 1 | 7/20/09 | 7/21/09 | 50,000 | 50,000 | \$3.70 | \$185,000 | Eagle Energy | 50,000 | \$3.50 | \$175,000 | Eagle Energy | \$10,000 |
| | | | | | | | (Upstream K# FT2U3000: RPAC #248330) | | | | | |
| | | | | | | | | | (CG 242932 to CG 243014) | | | |

FAR Charges = G-RPA \$0.05000 \$2,500

Total Including FAR charges \$187,500 \$175,000 **\$12,500**

Exhibit 5 - December 2009 Spot Purchase / Sale

Southern Systems Minimum Flow Purchase/Sale

| Notification Minimum Flow | | | PURCHASE | | | | | SALE | | | | Net \$ \$Purchase minus \$Sale |
|---------------------------|--|-------------------|-----------------------|-----------------------|---------------|---------------|-------------|----------------|-------------------|--------|-----------|--------------------------------------|
| Date notified | Flow Date | Amt needed (Dths) | Amt (Dths) | Purchase Price \$/dth | Rule 41 Limit | \$Amt | Co. Name | Amt (Dths) | Sale Price \$/dth | \$Amt | Co. Name | |
| December Activity | | | | | | | | | | | | |
| 2 | 12/8/09 | 12/9/09 | 150,000 | 50,000 | \$5.70 | | \$285,000 | ConocoPhillips | 50,000 | \$5.20 | \$260,000 | Conoco (redel) |
| | | | | 29,646 | \$5.80 | | \$171,947 | ConocoPhillips | 29,233 | \$5.20 | \$152,012 | Conoco (redel) |
| | | | | 49,468 | \$6.02 | outside limit | \$297,797 | EDF Trading | 30,000 | \$5.30 | \$159,000 | SDG&E |
| | | | | 19,443 | \$6.50 | outside limit | \$126,380 | Enserco | 20,000 | \$5.20 | \$104,000 | SDG&E |
| | | | | | | | | | 10,000 | \$5.20 | \$52,000 | Shell |
| | | | | | | | | | 10,000 | \$5.20 | \$52,000 | PacSummit |
| | Subtotal flow date: 12/09 | | 150,000 | 148,557 | | | \$881,124 | | 149,233 | | \$779,012 | |
| | | | Shortfall Purch 12/08 | 676 | \$5.70 | | \$3,853 | PacSummit | | | | |
| | Total flow date: 12/09 | | | 149,233 | | | \$884,977 | | 149,233 | | \$779,012 | \$105,965 |
| 3 | 12/8/09 | 12/10/09 | 25,000 | 5,000 | \$5.645 | | \$28,225 | Iberdrola | 10,000 | \$5.43 | \$54,300 | PacSummit |
| | Oxy Swing Supply met other half of request from Operations | | | 9,958 | \$5.72 | | \$56,960 | SET | 15,000 | \$5.30 | \$79,500 | SDG&E |
| | | | | 10,000 | \$5.63 | | \$56,300 | SET | | | | |
| | Subtotal flow date: 12/10 | | 25,000 | 24,958 | | | \$141,485 | | 25,000 | | \$133,800 | |
| | | | Shortfall Purch 12/08 | 50 | \$5.70 | | \$285 | PacSummit | | | | |
| | Total flow date: 12/10 | | | 25,008 | | | \$141,770 | | 25,000 | | \$133,800 | \$7,970 |
| | Total | | | 174,241 | | | \$1,026,747 | | 174,233 | | \$912,812 | \$113,935 |
| | Total flow date: 12/18 makeup shortfall in X300 | | | 726 | \$5.700 | | \$4,138 | PacSummit | | | | \$118,073 |
| | | | | | | | | | | | | \$ 0.67 |
| | FAR Charges = G-RPA \$0.05000 | | | | | | \$8,712 | | | | | |
| | Total Including FAR charges | | | | | | \$1,035,459 | | | | \$912,812 | \$122,647 |

Exhibit 6 - January 2010 Spot Purchase / Sale

Southern Systems Minimum Flow Purchase/Sale

| Notification Minimum Flow | | | PURCHASE | | | | SALE | | | | | Net \$ \$Purchase minus \$Sale |
|---------------------------|-----------|-------------------|------------|-----------------------|-------|----------|------------|-----------|-------------------|-------|----------|--------------------------------------|
| Date notified | Flow Date | Amt needed (Dths) | Amt (Dths) | Purchase Price \$/dth | \$Amt | Co. Name | Amt (Dths) | Flow Date | Sale Price \$/dth | \$Amt | Co. Name | |

January Activity

| | | | | | | | | | | | | |
|---|--------|--------|--------|--------|--------|-----------|-------------|--------|--------|--------|----------|--------------|
| 1 | 1/4/10 | 1/5/10 | 40,000 | 40,000 | \$6.15 | \$246,000 | EDF Trading | 10,000 | 1/7/10 | \$6.05 | \$60,500 | Oxy |
| 2 | 1/5/10 | 1/6/10 | 20,000 | 20,000 | \$6.15 | \$123,000 | EDF Trading | 10,000 | 1/7/10 | \$6.10 | \$61,000 | LouisDreyfus |
| | | | | | | | | 10,000 | 1/8/10 | \$6.25 | \$62,500 | SET |
| | | | | | | | | 10,000 | 1/8/10 | \$6.25 | \$62,500 | SET |
| | | | | | | | | 1,000 | 1/8/10 | \$6.20 | \$6,200 | BP |
| | | | | | | | | 4,000 | 1/8/10 | \$6.19 | \$24,760 | BP |
| | | | | | | | | 5,000 | 1/8/10 | \$6.19 | \$30,950 | Enserco |
| | | | | | | | | 10,000 | 1/8/10 | \$6.23 | \$62,300 | Shell |

Subtotal January Activity

60,000

\$369,000

60,000

\$370,710

(\$1,710)

FAR Charges = G-RPA \$0.04284

\$2,570

Total Including FAR charges

\$371,570

\$370,710

\$860

Exhibit 7 - August 2010 Purchase / Sale

Southern Systems Minimum Flow Purchase/Sale

| Notification Minimum Flow | | | PURCHASE | | | | | SALE | | | | | Net \$ \$Purchase minus \$Sale |
|---------------------------|-----------|-------------------|------------|-----------------------|----------------------|-------|----------|------------|-----------|-------------------|----------------------|-------|--------------------------------------|
| Date notified | Flow Date | Amt needed (Dths) | Amt (Dths) | Purchase Price \$/dth | Rule 41 Limit \$/dth | \$Amt | Co. Name | Amt (Dths) | Flow Date | Sale Price \$/dth | Rule 41 Limit \$/dth | \$Amt | |

August Activity

| | | | | | | | | | | | | | | |
|---|---------|---------|---------|--------|--------|---------------|-----------|----------------|--------|---------|---------|--------------|-----------|----------------|
| 1 | 8/17/10 | 8/18/10 | 40,000 | 39,871 | \$3.95 | within limit | \$157,490 | ConocoPhillips | 40,000 | 8/18/10 | \$3.65 | within limit | \$146,000 | ConocoPhillips |
| 2 | 8/19/10 | 8/19/10 | 40,000 | 40,000 | \$4.10 | within limit | \$164,000 | EDF | 10,000 | 8/20/10 | \$3.65 | within limit | \$36,500 | EDF |
| | | | | | | | | | 10,000 | 8/20/10 | \$3.65 | within limit | \$36,500 | ConocoPhillips |
| | | | | | | | | | 10,000 | 8/20/10 | \$3.66 | within limit | \$36,600 | JP Morgan |
| | | | | | | | | | 10,000 | 8/20/10 | \$3.60 | within limit | \$36,000 | JP Morgan |
| 3 | 8/22/10 | 8/23/10 | 40,000 | 40,000 | \$3.90 | within limit | \$156,000 | EDF | 40,000 | 8/23/10 | \$3.54 | within limit | \$141,600 | EDF |
| 4 | 8/23/10 | 8/24/10 | 100,000 | 99,589 | \$3.95 | within limit | \$393,377 | EDF | 20,000 | 8/24/10 | \$3.63 | within limit | \$72,600 | JP Morgan |
| | | | | | | | | | 10,000 | 8/25/10 | \$3.70 | within limit | \$37,000 | RRI Energy |
| | | | | | | | | | 10,000 | 8/25/10 | \$3.70 | within limit | \$37,000 | RRI Energy |
| | | | | | | | | | 20,000 | 8/25/10 | \$3.70 | within limit | \$74,000 | RRI Energy |
| | | | | | | | | | 20,000 | 8/25/10 | \$3.70 | within limit | \$74,000 | RRI Energy |
| | | | | | | | | | 20,000 | 8/25/10 | \$3.71 | within limit | \$74,200 | RRI Energy |
| 5 | 8/24/10 | 8/24/10 | 40,000 | 20,456 | \$4.01 | within limit | \$82,029 | EDF | 20,000 | 8/25/10 | \$3.70 | within limit | \$74,000 | BP Energy |
| 6 | 8/24/10 | 8/25/10 | 130,000 | 60,000 | \$4.15 | outside limit | \$249,000 | ConocoPhillips | 50,000 | 8/26/10 | \$3.690 | within limit | \$184,500 | RRI Energy |
| | | | | 30,000 | \$4.10 | outside limit | \$123,000 | JP Morgan | 50,000 | 8/26/10 | \$3.690 | within limit | \$184,500 | ConocoPhillips |
| | | | | 40,000 | \$4.05 | outside limit | \$162,000 | EDF | 30,000 | 8/26/10 | \$3.70 | within limit | \$111,000 | RRI Energy |
| | 8/25/10 | 8/25/10 | 30,000 | 21,644 | \$4.08 | within limit | \$88,308 | EDF | 21,644 | 8/25/10 | \$3.65 | within limit | \$79,001 | EDF |

| | Date notified | Flow Date | Amt needed (Dths) | Amt (Dths) | Purchase Price \$/dth | Rule 41 Limit \$/dth | \$Amt | Co. Name | Amt (Dths) | Flow Date | Sale Price \$/dth | Rule 41 Limit \$/dth | \$Amt | Co. Name | Net \$ \$Purchase minus \$Sale |
|---|---------------|-----------|-------------------|------------|-----------------------|----------------------|-----------|----------------|------------|-----------|-------------------|----------------------|-----------|----------------|-----------------------------------|
| 7 | 8/25/10 | 8/26/10 | 100,000 | 68,000 | \$3.72 | within limit | \$252,620 | EDF | 10,000 | 8/26/10 | \$3.700 | within limit | \$37,000 | RRI Energ | |
| | | | | 20,000 | \$3.70 | within limit | \$74,000 | ConocoPhillips | 20,000 | 8/26/10 | \$3.685 | within limit | \$73,700 | Citigroup | |
| | | | | 10,000 | \$3.73 | within limit | \$37,300 | SET | 20,000 | 8/26/10 | \$3.68 | within limit | \$73,600 | Gas Acq | |
| | 8/25/10 | 8/26/10 | 125,000 | 125,000 | \$3.95 | within limit | \$493,750 | EDF | 50,000 | 8/25/10 | \$3.61 | within limit | \$180,500 | EDF | |
| | 8/26/10 | 8/26/10 | 20,000 | 20,000 | \$3.95 | within limit | \$79,000 | ConocoPhillips | 40,000 | 8/27/10 | \$3.6025 | within limit | \$144,100 | RRI | |
| | | | | | | | | | 20,000 | 8/27/10 | \$3.60 | within limit | \$72,000 | Iberdrola | |
| | | | | | | | | | 700 | 8/27/10 | \$3.60 | within limit | \$2,520 | Iberdrola | |
| | | | | | | | | | 20,000 | 8/27/10 | \$3.600 | within limit | \$72,000 | ConocoPhillips | |
| | | | | | | | | | 20,000 | 8/27/10 | \$3.60 | within limit | \$72,000 | BP | |
| | | | | | | | | | 20,000 | 8/27/10 | \$3.60 | within limit | \$72,000 | JP Morgan | |
| | | | | | | | | 17,500 | 8/27/10 | \$3.61 | within limit | \$63,175 | JP Morgan | | |
| | | | | | | | | 2,500 | 8/27/10 | \$3.61 | within limit | \$9,025 | NextEra | | |
| | | | | | | | | 4,300 | 8/26/10 | \$3.60 | within limit | \$15,480 | EDF | | |
| 8 | 8/26/10 | 8/27/10 | 100,000 | 70,000 | \$3.62 | within limit | \$253,400 | ConocoPhillips | 80,700 | 8/26/10 | \$3.60 | within limit | \$290,520 | EDF | |
| | | | | 20,000 | \$3.61 | within limit | \$72,200 | ConocoPhillips | 19,300 | 8/27/10 | \$3.600 | within limit | \$69,480 | SDG&E | |
| | | | | 10,000 | \$3.62 | within limit | \$36,200 | SET | | | | | | | |

Purchase to Make X300 whole on shortfall of deliveries (i.e. purchases not made for SSR)

| | | | | | | | | | | |
|-------|--------|--------------|---------|-----------|--------|---------|--------|--------------|----------|-----------|
| 1,800 | \$3.50 | within limit | \$6,300 | Citigroup | -1,800 | 8/30/10 | \$3.50 | within limit | -\$6,300 | Citigroup |
| 284 | \$3.44 | within limit | \$977 | EDF | -284 | 8/30/10 | \$3.44 | within limit | -\$977 | EDF |

Subtotal August Activity

| | | | | | | | | | | |
|---------|--------------|--|-------------|--|---------|--|--|--|-------------|-----------|
| 736,644 | | | \$2,880,950 | | 736,644 | | | | \$2,682,101 | \$198,849 |
| 0 | <= shortfall | | | | | | | | | |

Total August Activity

| | | | | | | | | | | |
|---------|--|--|-------------|--|---------|--|--|--|-------------|-----------|
| 734,560 | | | \$2,873,673 | | 734,560 | | | | \$2,674,824 | \$198,849 |
|---------|--|--|-------------|--|---------|--|--|--|-------------|-----------|

FAR Charges = G-RPA \$0.04284

\$31,469

Total August Activity including FAR charges

\$2,905,142

\$2,674,824

\$230,318

Attachment C

Advice No. 4153-A

**Operator System Reliability Requests Posted on Envoy
After the Fact**



A  Semptra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 50,000 Dth

Flow Date(s) Requested: July 21, 2009

Time of Request: 3:50 p.m. July 20, 2009

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Semptra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested that the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 150,000 Dth

Flow Date(s) Requested: Dec 09, 2009

Time of Request: 1:30 p.m. Dec 08, 2009

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested that the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 50,000 Dth

Flow Date(s) Requested: Dec 10, 2009

Time of Request: 8:30 p.m. Dec 08, 2009

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Semptra Energy utility²

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Jan. 5, 2010

Time of Request: 2:00 p.m. Jan. 4, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 20,000 Dth

Flow Date(s) Requested: Jan. 6, 2010

Time of Request: 10:00 a.m. Jan. 5, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility³

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Aug. 18, 2010

Time of Request: 10:00 a.m. Aug. 17, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Aug. 19, 2010

Time of Request: 7:15 a.m. Aug. 19, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Aug. 23, 2010

Time of Request: 10:00 a.m. Aug 22, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A Sempra Energy utility

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Aug. 24, 2010

Time of Request: 8:00 p.m. Aug 23, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Aug. 24, 2010

Time of Request: 10:00 a.m. Aug 23, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempira Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 130,000 Dth

Flow Date(s) Requested: Aug. 25, 2010

Time of Request: 10:00 a.m. Aug 24, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 30,000 Dth

Flow Date(s) Requested: Aug. 25, 2010

Time of Request: 8:00 p.m. Aug 24, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Semptra Energy utility

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Aug. 26, 2010

Time of Request: 8:00 p.m. Aug 24, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System


Quantity Requested: 125,000 Dth

Flow Date(s) Requested: Aug. 26, 2010

Time of Request: 10:20 a.m. Aug 25, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 20,000 Dth

Flow Date(s) Requested: Aug. 26, 2010

Time of Request: 8:00 p.m. Aug 25, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement



A  Sempra Energy utility*

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to ensure system reliability.

Location: Blythe Receipt Point, Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Aug. 27, 2010

Time of Request: 8:00 p.m. Aug 25, 2010

Reason for Request: Southern System scheduled quantities were below the southern system minimum flowing supply requirement.

Attachment D

Advice No. 4153-A

**Confidential Version of Exhibits 4-7
Submitted under the Confidentiality Provisions of
General Order 66-C and Section 583 of the Public Utilities Code**