

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 6, 2011

**Advice Letters 4258 and 4258-A**

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

**Subject: Expansion of Off-System Delivery, D.11-03-029 and Partial Supplement**

Dear Ms. Prince:

Southern California Gas Company (SoCalGas) Advice Letter (AL) 4258-A is approved. With the exception of the modifications made in AL 4258-A, AL 4258 is also approved. The effective date of Tariff Sheet No. 47343-G is March 10, 2011. The effective date of all of the other approved tariff pages submitted with AL 4258 and AL 4258-A will be determined at a later time. SoCalGas shall notify the Energy Division and the service list for AL 4258 and 4258-A at least 20 days in advance of the requested effective date for such tariff pages, and SoCalGas shall re-submit the approved tariff pages to the Energy Division at the time of the notification.

Sincerely,

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

Julie A. Fitch, Director  
Energy Division



**Rasha Prince**  
Director  
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August 17, 2011

Advice No. 4258-A  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Partial Supplement - Expansion of Off-System Delivery, Decision (D.)11-03-029**

Southern California Gas Company (SoCalGas) hereby submits for filing revisions to its tariffs as shown on Attachment B.

**Purpose**

This partial supplement seeks approval to modify Schedule No. G-OSD, Off-System Delivery Service, as a result of the protest by the Indicated Producers<sup>1</sup> (IP) filed on August 4, 2011.

**Background**

On July 15, 2011, SoCalGas filed Advice No. (AL) 4258 in compliance with D.11-03-029, which authorized an expansion in off-system delivery (OSD) services and OP 38 of D.11-04-032. AL 4258 included multiple tariffs, including Schedule No. G-OSD.

On August 4, 2011, IP filed its protest to AL 4258 stating that SoCalGas' filed tariffs did not accurately reflect balancing rules that apply to OSD shippers. IP also stated that

"The Commission's decision adopts a new balancing rule that would apply to OSD shippers only when a gas imbalance results following Cycle 4. SoCalGas' testimony clarifies that the new balancing rule was intended to address only those imbalances that occur after Cycle 4. This is not clear from the proposed tariffs. The current Schedule G-OSD language suggests that an OSD shipper would have three business days to resolve any imbalances, rather than just those imbalances occurring after Cycle 4."

IP suggested a few changes to Special Condition 13 of Schedule No. G-OSD to accurately reflect the balancing rules that apply to OSD shippers. There were no other protests.

SoCalGas and IP have agreed to the following language for Special Condition 13 and IP agreed to withdraw its protest as a result of this agreement. (The revisions are shown in a bold font.)

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<sup>1</sup> The Indicated Producers is an *ad hoc* coalition which includes Aera Energy LLC, BP Energy Company, BP America Inc. (including Atlantic Richfield Company), CoconoPhillips Company, Chevron U.S.A. Inc., Midway Sunset Cogeneration Company (an affiliate of Aera Energy) and Occidental Energy Marketing Inc.

13. A Customer's OSD imbalance is defined as the **difference between the** quantity of gas scheduled into its OSD Contract ~~minus~~ **and** the quantity of gas scheduled out of its OSD Contract **following Cycle 4** on any given flow day. A Customer can clear its OSD imbalance by nominating gas into or out of its OSD imbalance account. If a Customer's OSD imbalance is not cleared by the end of three (3) business days after the flow day when the OSD imbalance occurred, then such OSD imbalance shall be resolved in accordance with the terms of Schedule No. G-IMB. Specifically, the Buy-Back Rate shall be applied to resolve a positive OSD imbalance and the Standby Procurement Charge shall be applied to resolve a negative OSD imbalance. OSD Customers shall not be allowed to trade their OSD imbalances with other OSD customers or on-system customers.

On August 11, 2011, SoCalGas sent a reply to the Energy Division (ED) briefly describing IP's protest and the subsequent agreement between SoCalGas and IP. On August 12, 2011, the ED suspended AL 4258 for up to 120 days to provide adequate time for Staff Review.

### **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 received within 20 days of the date this advice letter was filed with the Commission which is September 6, 2011. 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  
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](mailto:mas@cpuc.ca.gov)) and Honesto Gatchalian ([jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov)) of the Energy Division. A copy of the protest shall 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](mailto:snewsom@semprautilities.com)

### **Effective Date**

OP 3 of D.11-03-029 authorized SoCalGas to file a Tier 1 AL for interruptible OSD service. As discussed in the System Modifications section of AL 4258, the necessary system modifications will not be ready until some time in 2012. Therefore, SoCalGas respectfully requests that this filing be approved on September 16, 2011, which is thirty (30) calendar days after the date filed; but the tariffs be made effective beginning with the implementation date that will be communicated by SoCalGas at least 20 days in advance, except for the FASRMA (CAL. P.U.C. Sheet No. 47343-G in AL 4258) which has been made effective on March 10, 2011, the date of D.11-03-029.

**Notice**

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties in A.08-06-006 and A.10-03-028.

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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) #: 4258-A

Subject of AL: Partial Supplement - Expansion of Off-System Delivery

Keywords (choose from CPUC listing): \_\_\_\_\_

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

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

D.11-03-029

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<sup>1</sup>: N/A

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

Resolution Required?  Yes  No

Tier Designation:  1     2     3

Requested effective date: 9/16/11 (Tariff 10/1/11)

No. of tariff sheets: 3

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: G-OSD and TOCs

Service affected and changes proposed<sup>1</sup>: 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**

**Attention: Sid Newsom**

**555 West 5<sup>th</sup> Street, GT14D6**

**Los Angeles, CA 90013-1011**

**SNewsom@semprautilities.com**

<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT A**  
**Advice No. 4258-A**

**(See Attached Service Lists)**

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ATTACHMENT B  
Advice No. 4258-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 47452-G	Schedule No. G-OSD, OFF-SYSTEM DELIVERY SERVICE, Sheet 3	Revised 47347-G
Revised 47453-G	TABLE OF CONTENTS	Revised 47439-G
Revised 47454-G	TABLE OF CONTENTS	Revised 47440-G

Schedule No. G-OSD  
OFF-SYSTEM DELIVERY SERVICE

Sheet 3

(Continued)

SPECIAL CONDITIONS (Continued)

NOMINATIONS AND BALANCING (Continued)

10. The Utility will make available physical displacement capability at the Delivery Points on an interruptible basis at the applicable G-OSDI rate as shown above.
11. The Utility shall post, on its Electronic Bulletin Board (EBB), the daily G-OSDI rate for each Delivery Point before the deadline for Cycle 1 nominations for the flow day. No interruptible OSD service shall be charged without the G-OSDI rate first being posted on the EBB. All interruptible OSD service used by Customers at any Delivery Point during any flow day shall be charged the same G-OSDI rate posted for that particular Delivery Point for that particular flow day.
12. If any discount, rebate, or other waiver of G-OSDI is provided to an affiliate of the Utility, then the Utility shall: 1) offer the same discount, rebate, or waiver to all similarly situated Customers, i.e., other Customers using the same Delivery Point for that particular flow day; and 2) file an affiliate discount report as required by section III.F. of the Utility's affiliate transaction rules.
13. A Customer's OSD imbalance is defined as the difference between the quantity of gas scheduled into its OSD Contract and the quantity of gas scheduled out of its OSD Contract following Cycle 4 on any given flow day. A Customer can clear its OSD imbalance by nominating gas into or out of its OSD imbalance account. If a Customer's OSD imbalance is not cleared by the end of three (3) business days after the flow day when the OSD imbalance occurred, then such OSD imbalance shall be resolved in accordance with the terms of Schedule No. G-IMB. Specifically, the Buy-Back Rate for noncore retail service (BR-R) shall be applied to resolve a positive OSD imbalance and the Standby Procurement Charge for noncore retail service (SR-NR) shall be applied to resolve a negative OSD imbalance. OSD Customers shall not be allowed to trade their OSD imbalances with other OSD customers or on-system customers.
14. On any given flow day the net revenues from the interruptible and firm\* OSD services in the Southern System shall first be credited to the System Reliability Memorandum Account (SRMA) to offset the costs of the fixed deliveries into the Southern System for that particular flow day. The remainder, if any, of the above-mentioned interruptible and firm OSD service revenues plus the net interruptible and firm OSD service revenues from the Southern System for the remaining flow days plus the net interruptible and firm OSD service revenues from the Utility's other transmission systems shall then be credited to the Firm Access and Storage Rights Memorandum Account (FASRMA) to offset the costs of the system modification for providing the OSD services. Finally, any remaining interruptible and firm OSD service revenues shall be credited to the Backbone Transmission Balancing Account (BTBA), consistent with the requirements of D.11-04-032.

\* For firm OSD services net revenues from the volumetric charge only

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 4258-A  
DECISION NO. 11-03-029

ISSUED BY  
**Lee Schavrien**  
Senior Vice President

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Aug 17, 2011  
EFFECTIVE Oct 1, 2012  
RESOLUTION NO. \_\_\_\_\_

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T

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 4258-A  
 DECISION NO. 11-03-029

ISSUED BY  
**Lee Schavrien**  
 Senior Vice President

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Aug 17, 2011  
 EFFECTIVE \_\_\_\_\_  
 RESOLUTION NO. \_\_\_\_\_

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)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 4258-A  
 DECISION NO. 11-03-029

ISSUED BY  
**Lee Schavrien**  
 Senior Vice President

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Aug 17, 2011  
 EFFECTIVE \_\_\_\_\_  
 RESOLUTION NO. \_\_\_\_\_