### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

June 6, 2012



### **Advice Letter 4282**

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

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

Dear Ms. Prince:

Advice Letter 4282 is effective April 19, 2012 per Resolution G-3467.

Sincerely,

Edward F. Randolph, Director

Edward Ramloft

**Energy Division** 





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

September 30, 2011

Advice No. \_4282 (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: 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 September 1, 2010 through August 31, 2011 were in compliance with the standards, criteria and procedures described in Sections 9 through 17 of SoCalGas Rule No. 41.

### **Purpose**

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 2012.

### **Background**

In Decision (D.) 09-11-006, the Commission adopted SoCalGas' 2009 BCAP Phase Two Settlement Agreement.<sup>1</sup> Pursuant to Section II(B)(1) of the Settlement Agreement and as described in Section 23 of SoCalGas Rule No. 41<sup>2</sup>, 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 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.

<sup>1</sup> 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.

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

### Discussion

As shown in (Attachment B) from September 1, 2010 through August 31, 2011, SoCalGas spent \$3,789,043 to meet the Southern System minimum flow requirements. Over January 31, 2011 through February 4, 2011 SoCalGas purchased just over 1 Bcf of spot gas at Ehrenberg and Otay Mesa for \$8,314,055 (included in this amount was an incremental \$442,780 from Southern California Gas Company's Utility Gas Procurement Department as provider of last resort). This gas was then resold at the SoCal Citygate for \$4,525,012. All purchases and sales in Attachment B were made in accordance with Rule 41, either Section 13 or Section 14 (Attachment C).

These purchases were in response to System Operator requests for supply as documented in AL 4257, Appendix 2, Attachment 2, 3 (attached for reference as Attachment D).

As shown in AL 4257, Appendix 3, pages 16-23 (attached for reference as Attachment E), severe weather conditions prevented half of the requested supplies from being delivered. This in turn, required SoCalGas' Gas Control Department to call a curtailment on February 3, 2011. This curtailment of about 200 MMcf lasted 21 hours.

Company names, counterparty names, and details of purchases and sales deemed confidential are included in Attachments F, G, and H and are submitted under the confidentiality provisions of General Order 66-C and Section 583 of the Public Utilities Code and provided only to the Energy Division.

### **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 October 20, 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 (<a href="mailto:mas@cpuc.ca.gov">mas@cpuc.ca.gov</a>) and Honesto Gatchalian (<a href="mailto:inj@cpuc.ca.gov">inj@cpuc.ca.gov</a>) of the Energy Division. A copy of the protest should also be sent via both e-mail <a href="mailto: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**

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 December 1, 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:	tility 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 TYPE (Date Filed/ Received Stamp by CPUC)									
ELC = Electric GAS = Gas	WATED Water								
PLC = Pipeline HEAT = Heat WATER = Water									
Advice Letter (AL) #: 4282									
Subject of AL: <u>Annual Compliance</u> Purchases and Sales	Report on Utility S	System Operator's Southern System Reliability							
Keywords (choose from CPUC listing)	: Procurement								
AL filing type: $\square$ Monthly $\square$ Quarter	rly 🛛 Annual 🗌 O	ne-Time 🗌 Other							
If AL filed in compliance with a Comm	nission order, indi	cate relevant Decision/Resolution #:							
D.09-11-006									
Does AL replace a withdrawn or reject	cted AL? If so, ider	ntify the prior AL <u>No</u>							
Summarize differences between the A	AL and the prior wi	thdrawn or rejected AL¹: <u>N/A</u>							
Does AL request confidential treatme	ent? If so, provide e	explanation: Yes, Attachments F, G, and H are							
Resolution Required? Yes No	show 1 2011	Tier Designation: $\Box$ 1 $\Box$ 2 $\boxtimes$ 3							
Requested effective date: Decem		No. of tariff sheets: <u>0</u>							
Estimated system annual revenue effect									
Estimated system average rate effect		I showing evenege note effects on evetemen							
classes (residential, small commercia		L showing average rate effects on customer altural, lighting).							
Tariff schedules affected: None	, , , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , ,							
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	- J	Southern California Gas Company							
Attention: Tariff Unit		Attention: Sid Newsom							
505 Van Ness Ave.,		555 West 5th Street, GT14D6							
San Francisco, CA 94102		os Angeles, CA 90013-1011							
mas@cpuc.ca.gov and jnj@cpuc.ca.gov	S	SNewsom@semprautilities.com							

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

### **ATTACHMENT A**

### Advice No. 4282

(See Attached Service List)

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

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

**CPUC** 

Energy Rate Design & Econ. 505 Van Ness Ave., Rm. 4002 San Francisco, CA 94102

CPUC - DRA
R. Mark Pocta
rmp@cpuc.ca.gov

City of Azusa Light & Power Dept. 215 E. Foothill Blvd. Azusa, CA 91702

City of Colton Thomas K. Clarke 650 N. La Cadena Drive Colton, CA 92324

City of Pasadena - Water and Power Dept.
G Bawa

GBawa@cityofpasadena.net

Commerce Energy
Catherine Sullivan

**Crossborder Energy** 

csullivan@commerceenergy.com

Tom Beach tomb@crossborderenergy.com

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Douglass & Liddell Donald C. Liddell liddell@energyattorney.com Alcantar & Kahl Kari Harteloo klc@a-klaw.com

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

CPUC Pearlie Sabino pzs@cpuc.ca.gov

California Energy Market Lulu Weinzimer luluw@newsdata.com

City of Banning Paul Toor P. O. Box 998 Banning, CA 92220

City of Long Beach, Gas & Oil Dept. Chris Garner 2400 East Spring Street

City of Riverside Joanne Snowden jsnowden@riversideca.gov

Long Beach, CA 90806

**Commerce Energy** 

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Dept. of General Services Celia Torres celia.torres@dgs.ca.gov

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CPUC

Consumer Affairs Branch 505 Van Ness Ave., #2003 San Francisco, CA 94102

Calpine Corp Avis Clark aclark@calpine.com

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City of Vernon Dan Bergmann dan@igservice.com

County of Los Angeles Stephen Crouch 1100 N. Eastern Ave., Room 300 Los Angeles, CA 90063

Davis Wright Tremaine, LLP Edward W. O'Neill 505 Montgomery Street, Ste 800 San Francisco, CA 94111

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**Sierra Pacific Company** 

Christopher A. Hilen

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**Dynegy - West Generation Gas Transmission Northwest General Services Administration** Corporation Joseph M. Paul Facilities Management (9PM-FT) Bevin Hong Joe.Paul@dynegy.com 450 Golden Gate Ave. Bevin\_Hong@transcanada.com San Francisco, CA 94102-3611 Goodin, MacBride, Squeri, Ritchie & Hanna & Morton Genon Energy, Inc. Day, LLP **Greg Bockholt** Norman A. Pedersen, Esq. James D. Squeri Greg.Bockholt@Genon.com npedersen@hanmor.com jsqueri@gmssr.com **Iberdrola Renewables Energy Services Imperial Irrigation District** JBS Energy **Julie Morris** K. S. Noller Jeff Nahigian Julie.Morris@iberdrolaren.com P. O. Box 937 jeff@jbsenergy.com Imperial, CA 92251 **LADWP Kern River Gas Transmission Company LA County Metro** Janie Nielsen Julie Close Robert Pettinato Janie.Nielsen@KernRiverGas.com closeJ@metro.net Robert.Pettinato@ladwp.com **LADWP** Law Offices of William H. Booth Luce, Forward, Hamilton & Scripps Nevenka Ubavich William Booth John Leslie nevenka.ubavich@ladwp.com wbooth@booth-law.com jleslie@luce.com MRW & Associates **Manatt Phelps Phillips** Manatt, Phelps & Phillips, LLP **Robert Weisenmiller** Randy Keen David Huard mrw@mrwassoc.com rkeen@manatt.com dhuard@manatt.com **March Joint Powers Authority** National Utility Service, Inc. Navigant Consulting, Inc. **Lori Stone** Jim Boyle Ray Welch 23555 Meyer Drive, One Maynard Drive, P. O. Box 712 ray.welch@navigantconsulting.com March Air Reserve Base, CA 92518-Park Ridge, NJ 07656-0712 2038 **PG&E Tariffs** Praxair Inc RRI Energy **Pacific Gas and Electric** Rick Noger John Rohrbach PGETariffs@pge.com rick\_noger@praxair.com JRohrbach@rrienergy.com SCE Regulatory & Cogen Services, Inc. Safeway, Inc Donald W. Schoenbeck Karyn Gansecki Cathy Ikeuchi 900 Washington Street, #780 karyn.gansecki@sce.com cathy.ikeuchi@safeway.com

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### **ATTACHMENT B**

Advice No. 4282

Southern Systems Minimum Flow Purchases/Sales in Accordance with Rule No. 41, Sections 13 or 14

	Notification Minimum Flow				PU	RCHASE		SALE					
	Date notified	Flow Date	Amt needed (Dths)	Amt (Dths)	Purchase Price \$/dth	Rule 41 Limit \$/dth	\$ <i>A</i> mt	Amt (Dths)	Flow Date	Sale Price \$/dth	Rule 41 Limit \$/dth	\$Amt	Net \$ \$Purchase minus \$Sal
	February A	Activity:		•	•			•					
A (1)	1/31/11	2/1/11	130,000	35,000	\$4.70	within Sec 13	\$164,500	10,000	2/2/11	\$4.38	within Sec 13	\$43,800	
				95,000	\$4.68	within Sec 13	\$444,600	6,700	2/2/11	\$4.37	within Sec 13	\$29,279	
				-1,039	\$4.68	shortfall	-\$4,863	54,000	2/2/11	\$4.37	within Sec 13	\$235,980	
								59,300	2/2/11	\$4.38	within Sec 13	\$259,734	
B (1)	2/1/11	2/2/11	150,000	10,000	\$4.61	within Sec 13	\$46,100	5,000	2/2/11	\$4.38	within Sec 13	\$21,900	
•			,	15,000	\$4.67	within Sec 13	\$70,050	10,000	2/2/11	\$4.38	within Sec 13	\$43,800	
				6,100	\$4.61	within Sec 13	\$28,121	30,000	2/2/11	\$4.39	within Sec 13	\$131,700	
				10,000	\$4.65	within Sec 13	\$46,500	45,000	2/3/11	\$4.4825	within Sec 13	\$201,713	
				-847	\$4.61	shortfall	-\$3,905	20,000	2/3/11	\$4.4850	within Sec 13	\$89,700	
				30,000	\$4.88	within Sec 13	\$146,400	37,500	2/3/11	\$4.4850	within Sec 13	\$168,188	
				78,900	\$4.88	within Sec 13	\$385,032	2,500	2/3/11	\$4.4850	within Sec 13	\$11,213	
				-8,312	\$4.88	shortfall	-\$40,563						
B (2)	2/1/11	2/2/11	40,000	23,900	\$5.10	within Sec 14	\$121,890	90,000	2/4/11	\$4.4600	within Sec 13	\$401,400	
B (3)	2/2/11	2/2/11	60,000	25,000	\$4.9950	within Sec 13	\$124,875	20,000	2/4/11	\$4.52	within Sec 13	\$90,400	
				-4,473	\$4.995	shortfall	-\$22,343	10,000	2/4/11	\$4.50	within Sec 13	\$45,000	
				2,029	\$6.00	within Sec 14	\$12,174	9,300	2/4/11	\$4.48	within Sec 13	\$41,664	
B (4)	2/2/11	2/2/11	110,000	80,000	\$8.50	within Sec 14	\$680,000	85,000	2/4/11	\$4.46	within Sec 13	\$379,100	
B (5)	2/2/11	2/2/11	100,000	100,000	\$15.00	within Sec 14	\$1,500,000	10,000	2/4/11	\$4.4600	within Sec 13	\$44,600	
													•
C (1)	2/2/11	2/3/11	200,000	20,000	\$6.10	within Sec 13	\$122,000	35,000	2/4/11	\$4.46	within Sec 13	\$156,100	
				-9,999	\$6.10	shortfall	-\$60,994	12,300	2/4/11	\$4.465	within Sec 13	\$54,920	
				30,000	\$6.00	within Sec 13	\$180,000	180,000	2/5/11	\$4.2925	within Sec 13	\$772,650	
				-12,267	\$6.00	shortfall	-\$73,602	15,000	2/5/11	\$4.2925	within Sec 13	\$64,388	
				100,000	\$5.99	within Sec 13	\$599,000		•				l
				-7,144	\$5.99	shortfall	-\$42,793	10,000	2/8/11	\$4.1925	within Sec 13	\$41,925	
				50,000	\$5.681	within Sec 13	\$284,050	5,000	2/8/11	\$4.1925	within Sec 13	\$20,963	
				-17,567	\$5.681	shortfall	-\$99,798	15,000	2/8/11	\$4.1925	within Sec 13	\$62,888	
C (2)	2/2/11	2/3/11	50,000	25,000	\$4.9950	within Sec 13	\$124,875	80,000	2/8/11	\$4.1900	within Sec 13	\$335,200	
				-22,834	\$4.995	shortfall	-\$114,056	20,000	2/8/11	\$4.20	within Sec 13	\$84,000	
C (3)	2/2/11	2/3/11	100,000	20,000	\$12.50	within Sec 14	\$250,000	20,000	2/8/11	\$4.1900	within Sec 13	\$83,800	
C (4)	2/3/11	2/3/11	100,000	-4,741	\$12.50	shortfall	-\$59,263	10,000	2/8/11	\$4.20	within Sec 13	\$42,000	
C (5)	2/3/11	2/3/11	120,000	100,000	\$12.75	within Sec 14	\$1,275,000	20,000	2/8/11	\$4.20	within Sec 13	\$84,000	

	Date notified	Flow Date	Amt needed (Dths)	Amt (Dths)	Purchase Price \$/dth	Rule 41 Limit \$/dth	\$Amt	Amt (Dths)	Flow Date	Sale Price \$/dth	Rule 41 Limit \$/dth	\$Amt	Net \$ \$Purchase minus \$Sale
,				-6,962	\$12.75	shortfall	-\$88,766	10,000	2/8/11	\$4.18	within Sec 13	\$41,800	
C (6)	2/3/11	2/3/11	160,000	24,200	\$11.75	within Sec 14	\$284,350	9,992	2/8/11	\$4.19	within Sec 13	\$41,866	
				-6,999	\$11.75	shortfall	-\$82,238	10,000	2/8/11	\$4.21	within Sec 13	\$42,100	
C (7)	2/3/11	2/3/11	200,000	34,264	\$12.95	within Sec 14	\$443,719						
				-25,860	\$12.95	shortfall	-\$334,887						
				9,435	\$13.00	within Sec 14	\$122,655						
				-3,916	\$13.00	shortfall	-\$50,908						
				25,000	\$13.00	within Sec 14	\$325,000						
				-24,192	\$13.00	shortfall	-\$314,496						
			70,000	70,472	\$6.2831	n/a	\$442,780						
D (1)	2/2/11	2/4/11	175,000	50,000	\$6.8993	within Sec 13	\$344,965	20,000	2/10/11	\$4.06	within Sec 13	\$81,200	
				-8,938	\$6.8993	shortfall	-\$61,666	22,000	2/10/11	\$4.07	within Sec 13	\$89,540	
				65,000	\$7.4866	within Sec 13	\$486,629	38,587	2/10/11	\$4.07	within Sec 13	\$157,049	
				-12,518	\$7.4866	shortfall	-\$93,717						
				10,000	\$7.20	within Sec 13	\$72,000	6,224	2/24/11	\$3.930	within Sec 13	\$24,460	
				-4,644	\$7.20	shortfall	-\$33,437						
				50,000	\$7.00	within Sec 13	\$350,000	792	3/3/11	\$3.815	within Sec 13	\$3,021	
				-20,750	\$7.00	shortfall	-\$145,250						
				13,000	\$7.50	within Sec 13	\$97,500	472	4/1/11	\$4.18	within Sec 13	\$1,973	
				-8,900	\$7.50	shortfall	-\$66,750						
D (2)	2/3/11	2/4/11	175,000	20,000	\$9.00	within Sec 14	\$180,000						
D (3)	2/4/11	2/4/11	100,000	15,000	\$9.25	within Sec 14	\$138,750						
				-13,658	\$9.25	shortfall	-\$126,337						
				20,000	\$9.25	within Sec 14	\$185,000						
				-20,000	\$9.25	shortfall	-\$185,000						
				5,000	\$9.00	within Sec 14	\$45,000						
				-3,035	\$9.00	shortfall	-\$27,315						
				5,000	\$9.00	within Sec 14	\$45,000						
				6,962	\$12.75	within Sec 14	\$88,766						
				15,000	\$10.00	within Sec 14	\$150,000						
Subtot	al February	y Activity	2,040,000	1,044,667			\$8,274,337	1,044,667				\$4,525,012	\$3,749,325
	shortfall on delivered ==> 995,333 0 <== shortfall (Purchase - Sc					(Purchase - Sala		I	1				
	al February			1,044,667	]	( 2 <b>33</b>	\$8,274,337	1,044,667	]			\$4,525,012	\$3,749,325
FAR Charges: Spot purchases = G-RPA \$0.03802						\$0.03802	\$39,718		=				
Total February 2011 Activity including FAR charges ===>							\$8,314,055	]				\$4,525,012	\$3,789,043

### **ATTACHMENT C**

### Advice No. 4282

Transactions within Rule No. 41, Section 14

### **Attachment C**

### **Transactions within Section 14**

- \* no available price or supplies offered by contacted supplier
- \*\* Supplies purchased bolded

				Counterparties	Offer Price	Qty Offered**	
	Time of Request	Flow Date	Qty (Dth)	Requested	\$/Dth	(Dth)	Notes
B (2)	10:20 a.m. 2/1/11	2/2/2011	23900	Counterparty 1	5.10	23900	
				Counterparty 2	5.25	*	
				Counterparty 3	5.40	*	
				Counterparty 4	*	*	
				Counterparty 5	*	*	
				Counterparty 6	*	*	
B (3)	7:20 p.m. 2/1/11	2/2/2011	2029	Counterparty 6	6.00	2029	
				Counterparty 1	*	*	
				Counterparty 3	*	*	
				Counterparty 5	*	*	
B (4)	10:30 a.m. 2/2/11	2/2/2011	80000^	Counterparty 7	8.5	80000	^ Gas Control requested specifically for delivery to Otay Mesa
				Counterparty 2	*	*	
				Counterparty 5	*	*	
B (5)	12:30 p.m. 2/2/11	2/2/2011	100000	Counterparty 7	15.00	100000	
				Counterparty 3	*	*	
				Counterparty 2	*	*	
				Counterparty 5	*	*	
C (3)	2:40 p.m 2/2/11	2/3/2011	100000^	Counterparty 7	12.75	100000	^ All 3 requests were effectively for 2/3/11 Cy 3
C (4)	8:00 p.m. 2/2/11	2/3/2011	100000^	Counterparty 8	12.50	20000	

	Time of Request	Flow Date	Qty (Dth)	Counterparties Requested	Offer Price \$/Dth	Qty Offered** (Dth)	Notes
C (5)	6:20 a.m. 2/3/11	2/3/2011	120000^	Counterparty 3	*	*	
				Counterparty 5	*	*	
C (6)	8:00 a.m. 2/3/11	2/3/2011	24200	Counterparty 9	11.75	24200	^ Gas Control specified delivery to Otay Mesa after initial request
				Counterparty 12	*	*	
				Counterparty 3	15.00	30000	
				Counterparty 7	*	*	
C (7)	1:30 p.m. 2/3/11	2/3/2011	68699	Counterparty 3	12.95	34264	
				Counterparty 8	13.00	9435	
				Counterparty 10	13.00	25000	
				Counterparty 1	*	*	
				Counterparty 7	*	*	
				Counterparty 6	*	*	
				Counterparty 2	*	*	
				Counterparty 4	*	*	
D (2)	2:05 p.m. 2/3/11	2/4/2011	175000^	Counterparty 3	9.00	20000	^ Both requests were effectively for 2/4/11 Cy 1
D (3)	5:15 a.m. 2/4/11	2/4/2011	86962^	Counterparty 7	10.00	15000	
				Counterparty 7	12.75	6962	
				Counterparty 8	9.25	15000	
				Counterparty 9	9.00	5000	
				Counterparty 5	9.00	5000	
				Counterparty 10	9.25	20000	
				Counterparty 1	*	*	
				Counterparty 4	*	*	
				Counterparty 11	*	*	

### **ATTACHMENT D**

Advice No. 4282

**Annual Report of System Reliability Issues** 

(Southern System Reliability Requests and Southern System Reliability Transaction Postings)

### A. Southern System Reliability Request for Gas Day February 1, 2011

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 130,000 Dth

Flow Date(s) Requested: Feb. 1, 2011

Time of Request: 10:15 a.m. Jan. 31, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### B. Southern System Reliability Requests for Gas Day February 2, 2011

### First Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 150,000 Dth

Flow Date(s) Requested: Feb. 2, 2011

Time of Request: 7:00 a.m. Feb. 1, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### Second Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: Feb. 2, 2011

Time of Request: 10:20 a.m. Feb. 1, 2011

**Reason for Request:** Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### **Third Request**

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 60,000 Dth

Flow Date(s) Requested: Feb. 2, 2011

Time of Request: 7:20 p.m. Feb 1, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### B. (cont'd) Southern System Reliability Requests for Gas Day February 2, 2011

### **Fourth Request**

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 110,000 Dth

Flow Date(s) Requested: Feb. 2, 2011

Time of Request: 10:30 a.m. Feb 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### Fifth Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Feb. 2, 2011

Time of Request: 12:30 a.m. Feb 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### C. Southern System Reliability Requests for Gas Day February 3, 2011

### First 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: 200,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

Time of Request: 5:20 a.m. Feb. 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### **Second 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: Feb. 3, 2011

**Time of Request:** 10:20 a.m. Feb. 2, 2011

**Reason for Request:** Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### Third Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

Time of Request: 2:40 p.m. Feb. 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### C. (cont'd) Southern System Reliability Requests for Gas Day February 3, 2011

### **Fourth Request**

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

**Location:** Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

Time of Request: 8:00 p.m. Feb. 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement

### Fifth Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 120,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

Time of Request: 6:20 a.m. Feb. 3, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement

### Sixth Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

**Location:** Southern System

Quantity Requested: 160,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

**Time of Request:** 8:00 a.m. Feb. 3, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### C. (cont'd) Southern System Reliability Requests for Gas Day February 3, 2011

### **Seventh Request**

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 200,000 Dth

Flow Date(s) Requested: Feb. 3, 2011

Time of Request: 1:30 p.m. Feb. 3, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

### D. Southern System Reliability Requests for Gas Day February 4, 2011

### First Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 175,000 Dth

Flow Date(s) Requested: Feb. 4, 2011

**Time of Request:** 8:00 p.m. Feb. 2, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### Second Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

Location: Southern System

Quantity Requested: 175,000 Dth

Flow Date(s) Requested: Feb. 4, 2011

Time of Request: 2:05 a.m. Feb. 3, 2011

Reason for Request: Southern System scheduled quantities were below the southern system

minimum flowing supply requirement.

### **Third Request**

Purpose: SoCalGas' Gas Control Department requested the Operational Hub acquire gas supplies to

ensure system reliability.

**Location:** Southern System

Quantity Requested: 100,000 Dth

Flow Date(s) Requested: Feb. 4, 2011

**Time of Request:** 5:15 a.m. Feb. 4, 2011

**Reason for Request:** Southern System scheduled quantities were below the southern system

### A. FEBRUARY 2, 2011 TRANSACTIONS

### Southern System Reliability Transaction Posting for February 2, 2011

**Purpose:** SoCalGas' Operational Hub requested Gas Acquisition to acquire gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 12 to ensure system reliability.

### **Transaction 1**

Price: \$5.20 per Dth plus 3% fuel

Quantity: 10,000 Dth

Flow Date: Feb. 2, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

Special Terms: None

### **Transaction 2**

Price: \$5.60 per Dth plus 3% fuel

Quantity: 20,000 Dth

Flow Date: Feb. 2, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

Special Terms: None

### **B. FEBRUARY 3, 2011 TRANSACTIONS**

### Southern System Reliability Transaction Posting for February 3, 2011

**Purpose:** SoCalGas' Operational Hub requested Gas Acquisition to acquire gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 12 to ensure system reliability.

Price: \$7.12 per Dth

Quantity: 22,972 Dth

Flow Date: Feb. 3, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

Special Terms: None

### Revised February 9, 2011

### Southern System Reliability Transaction Posting for February 3, 2011

**Purpose:** SoCalGas' Operational Hub requested Gas Acquisition to acquire gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 12 to ensure system reliability.

### Transaction 1

Price: \$6.54 per Dth plus transportation and fuel

Quantity: Approximately 67,000 Dth of aggregate deliveries, which included approximately 42,000 Dth of net incremental supply purchased by Gas Acquisition on behalf of the Operational Hub, and approximately 25,000 Dth of core supplies redirected to Blythe through matching sales and purchase transactions.

Flow Date: Feb. 3, 2011

**Delivery Receipt Point:** Blythe Delivery Receipt Point

Special Terms: Under this transaction an aggregate quantity of approximately 67,000 Dth less fuel was delivered to the SoCalGas system at Blythe. To facilitate a portion of these deliveries, Gas Acquisition sold approximately 25,000 Dth of core supplies with delivery locations other than Blythe and acquired a matching amount of gas supplies with delivery to the Blythe receipt point. Gas Acquisition retained approximately 25,000 Dth for the core portfolio with the remainder being transferred to the Operational Hub.

### Transaction-2

Price: Transportation and fuel

Quantity: Approximately 52,000 Dth

Flow Date: Feb. 3, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

**Special Terms:** Under this transaction Gas Acquisition redirected the delivery of core portfolio supply to Blythe from other system receipt points. The Operational Hub will be charged the incremental transportation and fuel costs incurred by Gas Acquisition to redirect the deliveries. Delivered quantities will be retained by Gas Acquisition in the core portfolio.

### Second Revision - Revised May 2, 2011

### Southern System Reliability Transaction Posting for February 3, 2011

**Purpose:** SoCalGas' Operational Hub requested Gas Acquisition to acquire gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 12 to ensure system reliability. Revised due to reallocations done during March 2011.

### **Transaction 1**

Price: \$6.56 per Dth plus transportation and fuel

**Quantity:** Approximately 41,000 Dth of net incremental supply purchased by Gas Acquisition on behalf of the Operational Hub, in order to flow 67,000 Dth to Blythe through matching sales and purchase transactions.

Flow Date: Feb. 3, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

**Special Terms:** Under this transaction an aggregate quantity of approximately 67,000 Dth less fuel was nominated for delivery to the SoCalGas system at Blythe. To facilitate a portion of these deliveries, Gas Acquisition sold approximately 26,000 Dth of core supplies with delivery locations other than Blythe and acquired a matching amount of gas supplies with delivery to the Blythe receipt point.

### **Transaction 2**

**Price:** Transportation and fuel

Quantity: Approximately 28,000 Dth

Flow Date: Feb. 3, 2011

Delivery Receipt Point: Blythe Delivery Receipt Point

**Special Terms:** Under this transaction Gas Acquisition redirected the delivery of core portfolio supply to Blythe from other system receipt points. The Operational Hub will be charged the incremental transportation and fuel costs incurred by Gas Acquisition to redirect the deliveries. Delivered quantities will be retained by Gas Acquisition in the core portfolio.

### **ATTACHMENT E**

Advice No. 4282

PowerPoint Presentation for SoCalGas Utility Customer Forum May 17, 2011

# January 31, 2011 – 1st request for southern system support

- East of California experienced severe weather, causing high demand and well freeze offs
- Weather in Southern CA was cold, but not extreme
- Southern System Receipts were below the forecasted Southern System Minimum
- Reliability (SSR) supplies for 130,000 Dth for February 1 flow First request was made to the Hub for Southern System date



## February 1, 2011 – conditions deteriorate

- operating pressures as a result of significant supply El Paso posted that they were experiencing low shortfalls and high market demand
- Scheduled receipts dropped to a historical low
- Gas Control utilized line pack to maintain the southern system and storage to hold up the rest of the system



# February 2, 2011 – depletion of linepack continues

- Cold weather east of California continued
- El Paso issued a System Operating Constraint (SOC) and then a Critical Operating Condition (COC)
- Line pack continued to fall
- Scheduled receipts continued to be very low
- SSR requests were made for a total of 460,000 Dth but only 367,297 arrived

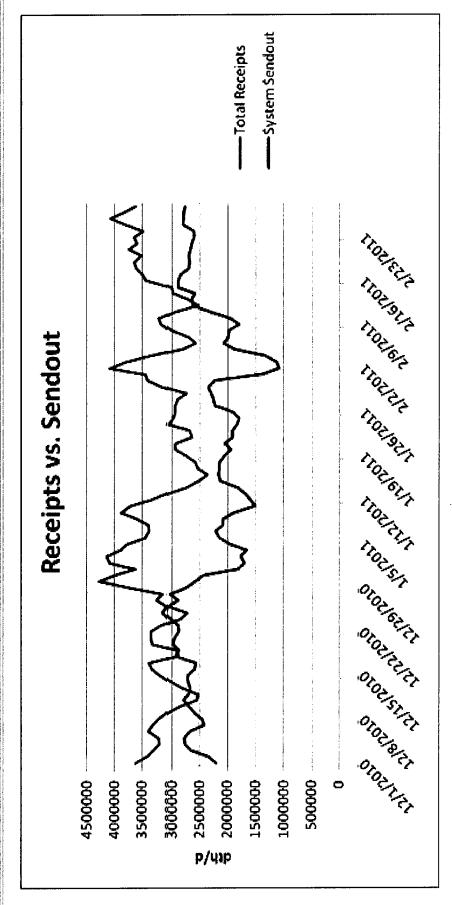


# February 3, 2011 - Curtailment

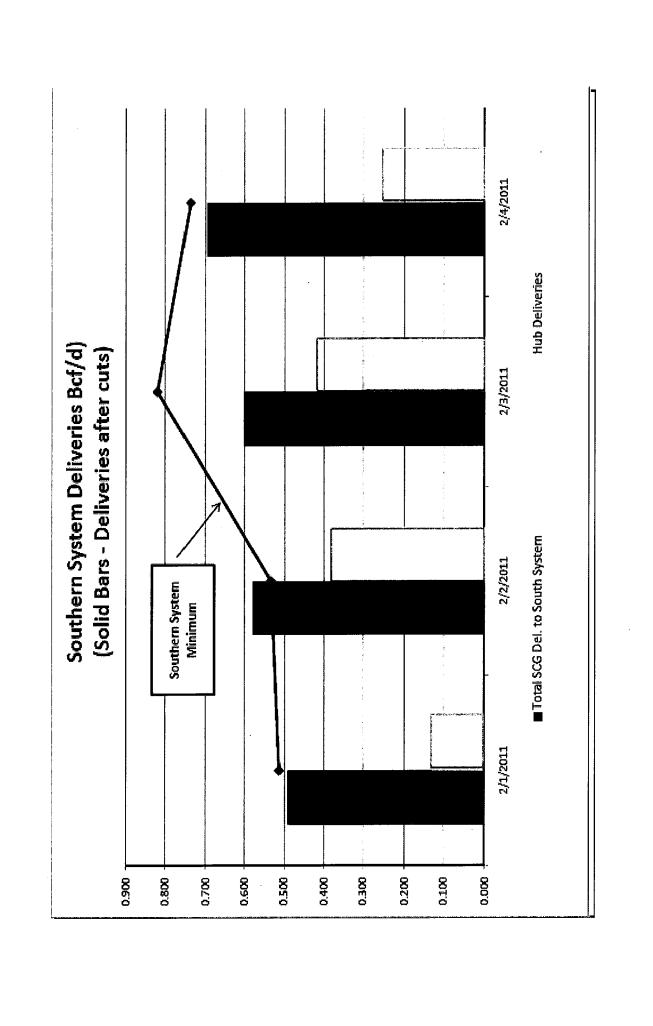
- Gas Control was unable to recover any line pack overnight
- Scheduled receipts were low
- SSR requests were made for a total of 930,000 Dth but only 295,418 Dth arrived
- which resulted in an additional 70,000 Dth delivered purchase supplies as the "Supplier of Last Resort", The Hub requested Gas Acquisition attempt to
- Curtailment is called for 3 PM



# Receipts were low and sendout was high







## **Curtailment Summary**

- Curtailment lasted 21 hours200 MMCFD curtailed
- SoCalGas curtailed a total of 19 interruptible and 40 firm customers
- SDG&E curtailed a total of 118 interruptible and 3 firm customers
- The Hub paid a net total of \$3.79 MM for SSR purchases for the event (1/31 to 2/4)



### February 4, 2011 – curtailment is lifted

- SSR requests were made for a total of 450,000 but only 182,519 Dth was received
- Gas Control was able to improve linepack
- Conditions east of California improved
- More supplies were sent to California
- Weather improved in California
- Weekend loads were anticipated to be lower
- Curtailment was ended at noon



### **ATTACHMENT F**

Advice No. 4282

Southern Systems Minimum Flow Purchases/Sales in Accordance with Rule No. 41, Sections 13 or 14

### CONFIDENTIAL

This Attachment is being provided only to the Energy Division under the confidentiality provisions of General Order 66-C and Section 583 of the Public Utilities Code.

### **ATTACHMENT G**

Advice No. 4282

### Transactions within Rule No. 41, Section 14

### CONFIDENTIAL

This Attachment is being provided only to the Energy Division under the confidentiality provisions of General Order 66-C and Section 583 of the Public Utilities Code.

### **ATTACHMENT H**

Advice No. 4282

### **ICE Price Backup**

### CONFIDENTIAL

This Attachment is being provided only to the Energy Division under the confidentiality provisions of General Order 66-C and Section 583 of the Public Utilities Code.