

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 5, 2013

Advice Letter 4406-G-A

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 4406-G-A is effective August 25, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division



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

July 26, 2013

Advice No. 4406-A
(U 904 G)

Public Utilities Commission of the State of California

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

In accordance with Resolution G-3480, Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) a supplement to its Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales for the period September 1, 2011 through August 31, 2012 (ACR).

Background

On September 28, 2012, via Advice No. (AL) 4406, SoCalGas submitted its ACR to demonstrate that its gas procurement activities from September 1, 2011 through August 31, 2012, to maintain Southern System reliability were in compliance with the standards, criteria and procedures described in Rule No. 41 of its tariffs. On June 27, 2013, the Commission issued Resolution G-3480, which approved all of the sales, and all but two of the 115 purchase transactions, described in the ACR.

Resolution G-3480 provided the following direction to SoCalGas regarding a supplemental advice filing to deal with these two unapproved purchase transactions and related statements by SoCalGas in AL 4406:

All of the sales transactions met the requirements under Section 13 of Gas Rule 41. As such these transactions are considered to be reasonable. There were 115 purchase transactions. Of these, 113 met the requirements of either Section 13 or Section 14 of Rule 41 and are therefore considered reasonable and approved. Two purchases, representing \$530,140 meet neither the Section 13 nor 14 requirements. SoCalGas has not provided sufficient information to demonstrate that these two transactions are reasonable under Section 15 of Rule 41. Therefore these two transactions are not approved. SoCalGas is required to submit, for further review by the Energy Division, a Supplemental Advice Letter, Advice Letter 4406-A, providing additional information and explanation concerning these two transactions.

There are incorrect statements in the text of the Advice Letter 4406. SoCalGas is required to incorporate corrections to these statements when it submits Supplemental Advice Letter 4406-A.¹

Ordering Paragraph 3 of Resolution G-3480 sets forth the specific information to be provided by SoCalGas in this supplemental filing:

3. SoCalGas shall prepare and submit, within 30 days of this Resolution a supplemental Advice Letter numbered 4406-A which:

(a) Corrects statements concerning purchase transactions meeting the requirements of Sections 13 or 14 of Rule 41 and accurately identifies the two transactions not meeting the requirements of these sections. As part of these corrections SoCalGas shall state the reasons that these transactions do not meet the requirements of Sections 13 or 14.

(b) Incorporates a table, in the text of the ACR, that presents the number and percent of transactions and the corresponding dollar amount and percent of total dollars that SoCalGas asserts are reasonable by nature of having met the requirements of Rule 41.

(c) Provide additional information concerning transactions TC#947 and TC#1089 and a supporting explanation, included in the text of the ACR, of whether and why these transactions should be approved under Section 15 of Rule 41.²

Corrections

Section 13 versus Section 14

AL 4406 contains the following statements regarding Southern System support purchases and sales described in the ACR:

Attachment C shows the details of the purchases and sales summarized in Attachment B. All sales and *most purchases* had prices that were within the automatic safe harbor price limits described in Section 13.³

As pointed out in Resolution G-3480, most of the purchases were actually made within the safe harbor price limits of Section 14, not Section 13.⁴ SoCalGas apologizes for this error.

¹ Resolution G-3480 at 2.

² Resolution G-3480 at 12.

³ AL 4406 at 2 (emphasis added).

⁴ As explained in Resolution G-3480, "Of the 115 purchases, 60 transactions (representing 52% of the total purchase transactions), were made outside of the Section 13 safe harbor price limits but within the criteria called for under Section 14. These Section 14 purchases represent approximately 49% of the dollar purchases. 53 purchases, representing just under 46% of the transactions fell within the safe harbor limits of Section 13. Section 13 purchases represented a slightly lower percent of the dollar amount of purchases than those made under Section 14." Resolution G-3480 at 5.

Two Transactions Not Meeting Both Section 14 Requirements

AL 4406 also contains the following statement regarding purchases that were made by contacting three or more suppliers per Section 14 (i.e., when less than required volumes are available on the Intercontinental Exchange (ICE)):

Attachment C also shows that other purchases were made by directly contacting three or more suppliers for offers per Section 14.⁵

As pointed out in Resolution G-3480:

There are two Section 14 requirements. The first of these is ensuring that “at least *three offers* from three different suppliers are available for comparison.”(emphasis added). This criterion is independent of the number of contacts needed to obtain three offers and making three or more contacts without receiving the required number of offers is not sufficient under the Section. Second, Section 14 requires that “the Operational Hub shall compare prices posted on ICE and, if applicable, prices quoted by its supplier contacts, and *select the best prices* available to meet the quantities required to meet minimum flow requirements.”(emphasis added).

SoCalGas has two purchases that do not meet Section 13 requirements and meet one but not both of the Section 14 requirements.⁶

SoCalGas agrees that it had two transactions (called out in notes to Attachment C to AL 4406)⁷ that met one but not both requirements of Section 14. SoCalGas should have explained this explicitly in the body of AL 4406, rather than just in notes to Attachment C.

Transactions TC#947 and TC#1089 will need to be evaluated for reasonableness under the provisions of Section 15, and we should have said so up front in AL 4406.

New Table

The following table presents the number and percent of transactions and the corresponding dollar amount and percent of total dollars that SoCalGas asserts are reasonable by nature of having met the requirements of Rule No. 41.

⁵ AL 4406 at 2.

⁶ Resolution G-3480 at 6-7 (citations omitted).

⁷ Our note for Transaction TC#947 read as follows: “Three offers were received. The low cost supplier could only provide about 15,000 dth but he was not sure if delivery was firm. We chose to go with the second lowest offer for firm delivery.” Our note for Transaction TC#1089 read as follows: “The call for supplies was received on Sunday morning (cycle 2) for flowing supplies on Monday. We successfully reached three counter parties by phone but received only two price quotes. Because of the scarcity of supply at that time we decided to execute based on the 2 offers rather than risk losing the supply in hand by waiting for a call back from other counter parties.”

	Number/%	\$(000s)/%
Section 13 Purchases	53/46%	\$10.94/48.7%
Section 14 Purchases	60/52%	\$10.98/48.9%
Other	2/2%	\$0.530/2.4%
Total	115/100%	\$22.45/100%

Pursuant to the Commission's direction in Resolution G-3480, SoCalGas will submit a similar table in all future ACRs, together with narrative explanations supported by appropriate documentation for any transactions to be evaluated as reasonable under Section 15 of Rule No. 41.⁸

Additional Information Supporting the Reasonableness of Transactions TC#947 and TC#1089

For ease of reference, the following chart provides the dates, volumes, and prices for Transactions TC#947 and TC#1089:⁹

Date notified	Flow Date	TC	Amt (Dths)	In-kind 0.22% (Dths)	Net Amt flowed (Dths)	Purchase Price \$/dth	Rule No. 41 Limit \$/dth	\$Amt
12/5/11	12/6/11	947	73,140	161	72,979	\$4.36	Note	\$318,890
			5,000			\$5.50		na
			15,000			\$4.120		na
2/26/12	2/27/12	1089	65,000	113	64,887	\$3.25	Note	\$211,250

SoCalGas believes that both of these transactions were reasonable for the reasons set forth below.

Transaction TC#947

Transaction TC#947, executed on December 5, 2011, for a flow date of December 6, 2011, was a purchase of 73,140 dth at a price of \$4.36/dth, for a total cost of \$318,890. This total cost is \$9,143 above the Section 13 ICE safe harbor price of \$4.235/dth multiplied by 73,140 dth, or \$309,747.

The Commission described its concerns with this transaction as follows:

The purchase designated as TC# 947 does not meet Section 13 requirements and fails to meet one of the two Section 14 requirements. SoCalGas did not select the best prices in making this transaction. When notified on 12/5/11 of the minimum flow requirements for 12/6/2011 SoCalGas made a purchase, in the amount of 73,140 dth with a purchase price of \$4.36 per dth for a total price of \$318,890. The purchase represents the second lowest price of three offers. As such it falls outside of Section 14. The text of the advice letter did not identify this transaction as outside of Section 14. However, in Attachment C (and in the

⁸ See Resolution G-3480 at 12-13 (Ordering Paragraph 5).

⁹ This information was originally provided by SoCalGas in Attachment C to AL 4406.

confidential version of Attachment C, Attachment F) which details each purchase and sale SoCalGas entered a note concerning the transaction. The note stated that "Three offers were received. The low cost supplier could only provide about 15,000 dth but he was not sure if delivery was firm. We chose to go with the second lowest offer for firm delivery." Given this, the purchase does not meet the Section 14 requirement that SoCalGas will accept the offers with best prices available. The AL provides no additional information concerning why there was concern about whether the delivery was firm, if additional offers were made, etc.

...

... The somewhat limited information provided by SoCalGas, after multiple data requests, does suggest that there were supply issues. However, SoCalGas failed to provide information to confirm or deny that suggestion and provide an adequate context for its decision to use other than the lowest cost supplier. Staff's research indicates that significant information to fully meet its data request is available.¹⁰

At the very least, the initial \$309,747 spent by SoCalGas for this transaction should be considered reasonable since that amount would have been deemed reasonable pursuant to the safe harbor provisions of Section 13.

In addition, if SoCalGas had accepted the low cost offer of \$4.12 for this initial 15,000 dth (and the supplier had been able to perform), SoCalGas would have purchased the remainder of its needs from the second lowest bidder, and the transaction would have been deemed reasonable under Section 14 (since SoCalGas received three offers). Under such a scenario, the total cost would have been \$315,290 -- only \$3,600 less than the \$318,890 SoCalGas spent on this transaction. This \$3,600 difference is the only amount that should be subject to reasonableness review since SoCalGas would have been unable to accept the low-price offer for anything more than the volumes offered to it.

The \$3,600 that SoCalGas spent above the Rule No. 14 safe harbor should also be considered reasonable given the circumstances it faced when making this purchase.

As SoCalGas noted in Attachment C to AL 4406, the potential supplier with the lowest bid was unsure whether the 15,000 dth would be delivered due to well freeze ups. As a result of these concerns, SoCalGas chose to obtain all of its supplies that day from the second lowest bidder, who did not express any deliverability concerns. SoCalGas endeavors to obtain the lowest priced Southern System supplies whenever possible. But when faced with a question of reliability or price, SoCalGas must choose reliability. It would be a hollow victory for its customers if it saves \$0.10/dth on a supply transaction, but the supplies can't be delivered and it is either forced to procure much higher priced supplies in later cycles, or even curtail Southern System customers because of supply shortages.

This price/reliability cannot be measured with exactitude, and must be dealt with by SoCalGas in real time. Yes, a supplier with potential delivery issues might be able to perform. But if they don't, SoCalGas and its customers could be in real trouble. In this instance, SoCalGas deemed it significant that the low bidder was offering only limited volumes and expressing concerns

¹⁰ Resolution G-3480 at 7-8 (citations omitted).

about getting those volumes to SoCalGas. Moreover, based on information SoCalGas was receiving at the time, it believed that well freeze offs were a very real possibility. After-the-fact research for this supplemental advice filing confirms that this belief was well founded. In particular, on December 6, 2011, the minimum temperature at the Durango County airport was - 1 degree Fahrenheit -- over 22 degrees below the prior five days average. Due to the low temperature, on December 6 San Juan production was 176,000 dth below the prior five days. On that same day, production at the Permian basin was almost 200,000 below the prior five days average. All of this data is provided in Attachment B in both spreadsheet and graphic format.

SoCalGas will never know whether the low bidder on December 5 could have actually delivered the 15,000 dth that they tentatively made available. But given the well freeze offs and supply cuts taking place at the time, and given the bidder's concerns about actually being able to deliver, SoCalGas should not be penalized for spending slightly more to ensure that curtailments did not take place on the Southern System.

Transaction TC#1089

Transaction TC#1089, executed on February 26, 2012, for a flow date of February 27, 2012, was a purchase of 64,887 dth at a price of \$3.25/dth, for a total cost of \$211,250. This total cost is \$14,600 above the Section 13 ICE safe harbor price of \$3.025/dth multiplied by 64,887 dth, or \$196,650.

The Commission described its concerns with this transaction as follows:

The purchase designated as TC# 1089 does not meet Section 13 requirements and fails to meet both of the Section 14 requirements. This transaction was made without obtaining three offers. Attachments C and F report a purchase of 64,887 dths for a flow date of 2/27/12 and a total price of \$211,250. Similar to the purchase related to flow date of 12/6/11, discussed above, this transaction was not shown in Attachment C or F as meeting Section 13 or 14. Rather, a note was provided. The note explains that while three calls for offers were made only two quotes were received. The note further states that based on a *scarcity of supply* a decision was made to execute based on the two offers rather than risk losing the supply in hand while waiting for a third offer. No additional information was provided.¹¹

At the very least, the initial \$196,650 spent by SoCalGas for this gas should be considered reasonable since that amount would have been deemed reasonable pursuant to the safe harbor provisions of Section 13. The only question for the Commission regarding this transaction should be whether the additional \$14,600 spent by SoCalGas is reasonable under Section 15 of Rule No. 41.

The \$14,600 that SoCalGas spent in excess of the Rule 13 safe harbor should be considered reasonable given the circumstances SoCalGas faced when making this purchase.

On Sunday, February 26, 2012, 11 A.M. PST, Gas Operations made a request for 75,000 Dth of Southern System supplies. At this time, the System Operator Hub relied mainly on four

¹¹ Resolution G-3480 at 8 (citations omitted).

suppliers who had demonstrated the capability to reliably provide incremental Southern System gas. SoCalGas called each of these four suppliers by phone. Three of the four suppliers answered its calls and replied they would start searching for supplies. SoCalGas left a phone message with the fourth supplier explaining its needs. Two of the suppliers responded with an offer, another responded that he did not have the supply, and the fourth did not return the call.

During the weekend, it is more difficult to procure new supplies. The market suspends trading after Friday's close and does not resume until Monday morning. Because gas is traded the day before flow, gas traded on Friday is for flow over the 3-day period of Saturday through Monday, which means that gas has been committed over this period of time. Over the weekend, significantly fewer parties are reachable. In addition, to obtain gas on a weekend, SoCalGas needs to find someone who can move gas from another use, or has uncommitted gas (most likely in storage).

Once SoCalGas received two offers, it was under pressure to make a decision or risk losing the gas it had in hand -- suppliers will not commit to quantity or price until SoCalGas executes. Adding to this pressure was the fact that the System Operator's biggest supplier for the month was not able to provide an offer. As a result, SoCalGas was concerned that little gas was available. In addition, the fourth potential supplier SoCalGas was waiting to hear from had not been a major supplier for the System Operator's previous purchases during the month, and it did not expect the supplier to offer much quantity.

Of the two offers in hand, one met the safe harbor provisions of Section 13, and the other was comparably priced to gas the System Operator acquired the previous weekend. In light of all these circumstances, the System Operator decided to execute the two offers it had received rather than risking these supplies by waiting to hear back from the fourth potential supplier. In fact, SoCalGas did not hear back from this potential supplier that day.

Given the potential consequences of losing the supplies SoCalGas had in hand, it should not be penalized for attempting to reach the four suppliers who have demonstrated the capability to reliably provide incremental Southern System supplies, and taking the two offers SoCalGas received. Under the circumstances, SoCalGas' efforts satisfy the spirit, if not the exact letter, of the Rule No. 14 requirement that SoCalGas obtain three offers.

Conclusion

For the reasons set forth above, SoCalGas respectfully requests that the Commission approve the full amount of both Transaction TC#947 and Transaction TC#1089 as reasonable according to Section 15 of Rule No. 41.

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 August 15, 2013. 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 Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). 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
Southern California Gas Company
555 West Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

Effective Date

SoCalGas believes this AL 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 be approved on August 25, 2013, which is 30 calendar days after the date filed.

Notice

A copy of this AL is being sent to the parties listed in 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) #: 4406-A

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

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 #:

D.09-11-006

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: _____

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 8/25/13

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: N/A

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
EDTariffUnit@cpuc.ca.gov

Southern California Gas Company
Attention: Sid Newsom
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011
SNewsom@semprautilities.com
tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A
Advice No. 4406-A

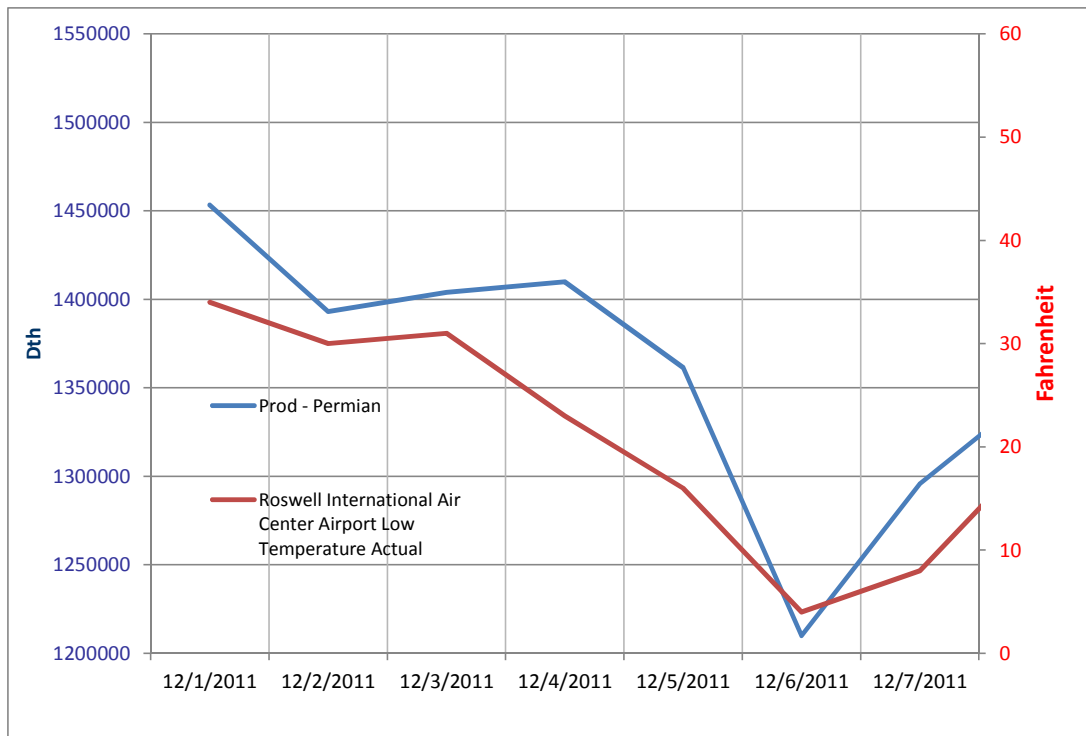
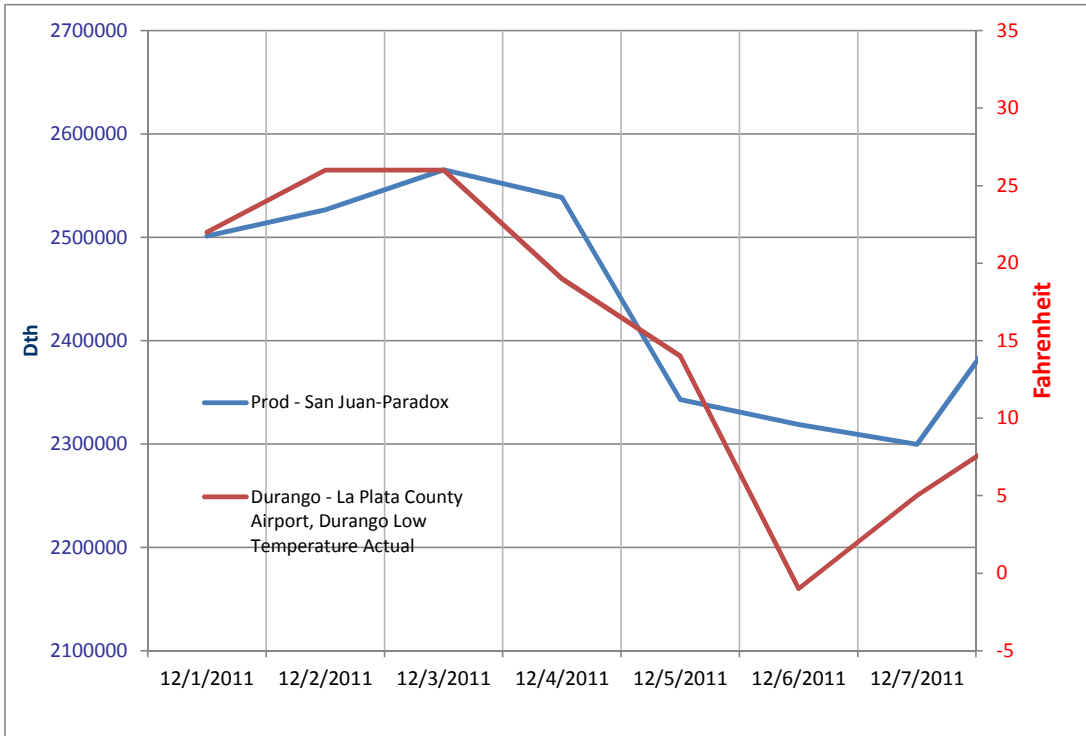
(See Attached Service Lists)

ATTACHMENT B

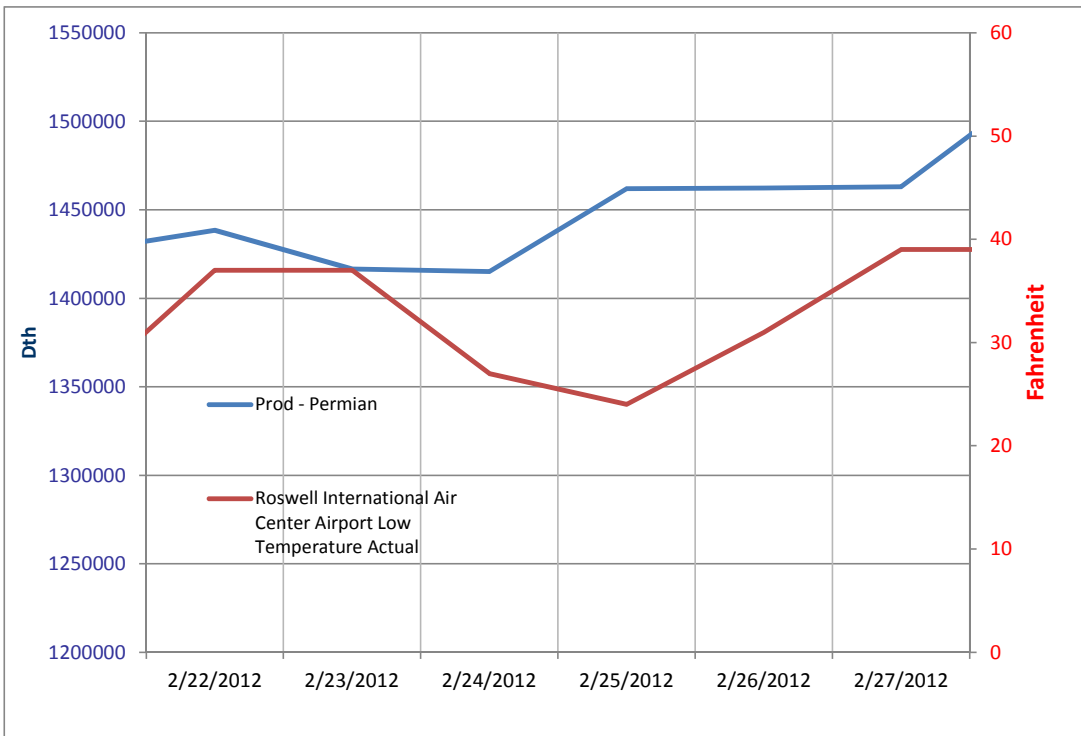
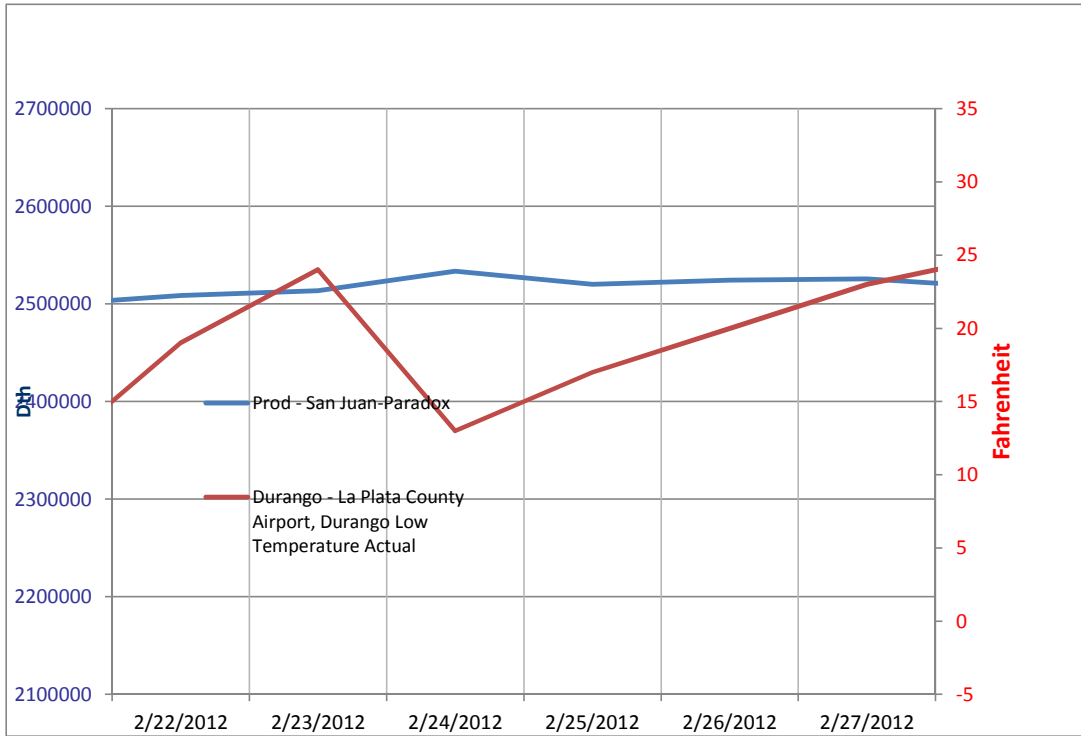
Advice No. 4406-A

**Supplemental Justification for
TC #977 and TC #1089**

Supplemental Justification for TC# 977 and TC# 1089



Supplemental Justification for TC# 977 and TC# 1089



Supplemental Justification for TC# 977 and TC# 1089

	Durango - La Plata County Airport, Durango Low	Durango - La Plata County Airport, Durango High	Durango - La Plata County Airport, Durango Mean	Prod - Permian	Roswell Internatio nal Air Center Airport Low	Roswell Internatio nal Air Center Airport High	Roswell Internatio nal Air Center Airport Mean	
	Prod - San Juan-Paradox	Temperat ure Actual	Temperat ure Actual	Temperat ure Actual	Temperat ure Actual	Temperat ure Actual	Temperat ure Actual	
12/1/2011	2501120	22	52	37	1453360	34	53	44
12/2/2011	2526584	26	35	31	1393184	30	36	33
12/3/2011	2565447	26	34	30	1403952	31	50	40
12/4/2011	2538581	19	29	24	1409931	23	43	33
12/5/2011	2342987	14	23	19	1361516	16	33	25
12/6/2011	2318730	-1	23	11	1209911	4	19	12
12/7/2011	2299711	5	35	20	1295896	8	37	23
12/8/2011	2458417	10	35	23	1349472	20	46	33
12/9/2011	2386570	9	39	24	1377966	24	46	35
12/10/2011	2460233	11	42	27	1408125	27	38	33
12/11/2011	2448743	11	43	27	1406815	31	42	37
12/12/2011	2457307	17	35	26	1399991	38	42	40
12/13/2011	2473458	32	41	37	1356866	41	47	44
12/14/2011	2479988	20	35	28	1424414	37	59	48
12/15/2011	2503607	16	36	26	1416224	30	50	40
12/16/2011	2539192	13	41	27	1426374	27	46	37
12/17/2011	2462275	13	48	31	1433416	30	48	39
12/18/2011	2492228	20	53	37	1440317	42	53	48
12/19/2011	2502989	27	36	32	1433837	34	54	44
12/20/2011	2506485	23	32	28	1408522	30	46	38
12/21/2011	2491014	22	33	28	1426118	24	55	40
12/22/2011	2475317	18	27	23	1426653	28	41	35
12/23/2011	2472384	2	34	18	1432753	23	28	26
12/24/2011	2382945	9	38	24	1410386	20	31	26
12/25/2011	2385904	11	44	28	1321166	7	36	22
12/26/2011	2402622	12	38	25	1326746	11	31	21
12/27/2011	2398444	13	43	28	1421738	9	37	23
12/28/2011	2411199	12	42	27	1358390	10	43	27
12/29/2011	2449295	16	51	34	1369458	21	55	38
12/30/2011	2481182	21	51	36	1368419	31	56	44
12/31/2011	2479738	17	47	32	1357973	30	67	49
1/1/2012	2451899	11	47	29	1406840	25	49	37
1/2/2012	2466114	14	53	34	1459011	25	48	37
1/3/2012	2463813	14	49	32	1437321	20	58	39
1/4/2012	2515177	13	50	32	1412153	34	62	48
1/5/2012	2464746	14	49	32	1444482	23	63	43
1/6/2012	2512218	15	48	32	1430741	25	71	48
1/7/2012	2503355	16	48	32	1412147	27	54	41
1/8/2012	2506532	16	43	30	1429669	29	53	41
1/9/2012	2501058	10	42	26	1423329	27	44	36
1/10/2012	2459900	10	44	27	1473577	24	64	44
1/11/2012	2462890	11	44	28	1491738	28	66	47
1/12/2012	2499731	6	38	22	1482674	25	42	34
1/13/2012	2454309	2	46	24	1482372	19	58	39
1/14/2012	2454854	4	46	25	1488202	19	63	41
1/15/2012	2506757	8	47	28	1474701	23	72	48
1/16/2012	2442209	21	35	28	1484325	41	70	56
1/17/2012	2514719	1	32	17	1486270	29	55	42
1/18/2012	2451447	2	40	21	1475736	20	65	43

Supplemental Justification for TC# 977 and TC# 1089

1/19/2012	2498434	8	42	25	1452672	39	80	60
1/20/2012	2563059	13	47	30	1477181	31	79	55
1/21/2012	2538420	16	37	27	1493218	29	76	53
1/22/2012	2509925	13	37	25	1492437	46	64	55
1/23/2012	2498361	7	35	21	1493794	28	69	49
1/24/2012	2498684	17	39	28	1509930	37	61	49
1/25/2012	2496035	15	38	27	1499802	32	61	47
1/26/2012	2502319	13	42	28	1479154	29	64	47
1/27/2012	2632205	19	42	31	1490202	29	71	50
1/28/2012	2617396	9	38	24	1506948	24	50	37
1/29/2012	2595407	12	42	27	1498800	18	63	41
1/30/2012	2578458	14	47	31	1487228	25	70	48
1/31/2012	2522287	18	42	30	1517298	28	70	49
2/1/2012	2543031	15	42	29	1518139	31	69	50
2/2/2012	2530263	29	39	34	1515601	30	72	51
2/3/2012	2530628	24	37	31	1520663	28	58	43
2/4/2012	2566285	22	41	32	1521254	28	52	40
2/5/2012	2564543	26	32	29	1518480	25	46	36
2/6/2012	2552356	16	35	26	1521786	19	54	37
2/7/2012	2481044	7	37	22	1487495	26	50	38
2/8/2012	2508423	16	46	31	1480406	21	49	35
2/9/2012	2512675	24	47	36	1438085	30	62	46
2/10/2012	2520480	17	45	31	1504870	29	58	44
2/11/2012	2533126	19	47	33	1439993	26	40	33
2/12/2012	2545202	27	33	30	1460731	26	34	30
2/13/2012	2546963	27	37	32	1462966	27	64	46
2/14/2012	2515015	19	40	30	1466184	26	70	48
2/15/2012	2528771	14	34	24	1436711	37	66	52
2/16/2012	2528026	18	44	31	1457291	29	53	41
2/17/2012	2527881	17	45	31	1443874	34	48	41
2/18/2012	2533762	14	43	29	1417480	33	52	43
2/19/2012	2495785	21	36	29	1437540	31	66	49
2/20/2012	2517103	8	32	20	1436016	32	60	46
2/21/2012	2498925	11	42	27	1426093	25	71	48
2/22/2012	2508719	19	49	34	1438364	37	79	58
2/23/2012	2513469	24	45	35	1416507	37	80	59
2/24/2012	2533549	13	43	28	1415082	27	54	41
2/25/2012	2520031	17	51	34	1461964	24	70	47
2/26/2012	2524369	20	44	32	1462330	31	76	54
2/27/2012	2525525	23	51	37	1463022	39	61	50
2/28/2012	2516798	25	42	34	1520800	39	75	57
2/29/2012	2511888	9	39	24	1487204	24	71	48
3/1/2012	2526282	19	38	29	1491421	35	80	58
3/2/2012	2522456	16	35	26	1488221	31	66	49
3/3/2012	2503798	8	38	23	1468307	28	63	46
3/4/2012	2445319	16	49	33	1418472	27	75	51
3/5/2012	2497875	22	55	39	1458885	33	78	56
3/6/2012	2464910	25	52	39	1417977	35	85	60
3/7/2012	2522539	28	47	38	1432257	44	81	63
3/8/2012	2500024	26	47	37	1450000	35	51	43
3/9/2012	2481801	25	49	37	1426369	34	43	39
3/10/2012	2520284	27	51	39	1435546	29	40	35
3/11/2012	2480259	25	56	41	1439927	24	74	49
3/12/2012	2549401	22	57	40	1439033	32	77	55
3/13/2012	2459295	24	61	43	1430614	34	83	59
3/14/2012	2488703	20	61	41	1444555	41	83	62
3/15/2012	2508151	20	64	42	1460205	38	81	60
3/16/2012	2539759	23	66	45	1465367	37	88	63
3/17/2012	2545729	25	62	44	1463796	36	86	61

Supplemental Justification for TC# 977 and TC# 1089

3/18/2012	2539342	23	55	39	1472056	46	80	63
3/19/2012	2525986	17	31	24	1455074	36	61	49
3/20/2012	2454220	8	48	28	1383765	33	56	45
3/21/2012	2503832	19	59	39	1401868	39	71	55
3/22/2012	2464025	23	66	45	1388446	33	78	56
3/23/2012	2516367	26	68	47	1462869	38	83	61
3/24/2012	2501115	26	68	47	1479649	35	88	62
3/25/2012	2531050	28	69	49	1473397	40	91	66
3/26/2012	2524480	31	63	47	1470753	51	91	71
3/27/2012	2447852	23	64	44	1460121	39	86	63
3/28/2012	2494888	22	67	45	1439261	41	86	64
3/29/2012	2507593	26	66	46	1437621	44	89	67
3/30/2012	2545618	26	70	48	1452209	41	90	66
3/31/2012	2538637	31	72	52	1462534	45	92	69