

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 16, 2015

Advice Letters 4603-G and 4603-G-A

Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

SUBJECT: Curtailment of Standby Service on February 6, 2014

Dear Mr. van der Leeden:

Advice Letters 4603-G and 4603-G-A are effective as of February 6, 2014, per Resolution G-3496 Ordering Paragraphs.

Sincerely,

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

Edward Randolph
Director, Energy Division



Ronald van der Leeden
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

Tel: 213.244.2009

Fax: 213.244.4957

RvanderLeeden@semprautilities.com

September 25, 2015

Advice No. 4603-A
(U 904 G)

Public Utilities Commission of the State of California

Subject: Partial Supplement: Curtailment of Standby Service on February 6, 2014

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter to notify the California Public Utilities Commission (Commission) and affected parties of a curtailment event in its service territory.¹

Purpose

On August 27, 2015, the Commission adopted Resolution G-3496, which approved SoCalGas Advice No. (AL) 4576 dated February 6, 2014, which provided notification of a curtailment event in its service territory.

This filing complies with Ordering Paragraph (OP) 2 of Resolution G-3496 which directs that:

Southern California Gas Company shall, within 30 days, file a supplemental Advice Letter 4603-A. The supplemental advice letter shall (a) as required by Commission Decision 91-09-026, state the facts underlying and the reasons for the curtailment, shall demonstrate that the type of curtailment being declared complies with SoCalGas' tariffs, and shall set forth the efforts SoCalGas has taken to minimize or alleviate the curtailment; and, (b) include in AL 4603-A an explanation for the deficiency in AL 4603.

¹ SoCalGas is submitting this Advice Letter pursuant to Decision (D.) 91-09-026.

Requested Information**A. Facts Underlying and Reasons for the Curtailment**

On prior days before curtailment (February 3, 2014 to February 5, 2014), system load profiles were fairly constant with out-of-state receipts and storage withdrawal meeting load. Out-of-state receipts were low and storage withdrawal reached maximum rates during this time frame. With these factors in place, the system remained stable during this time frame.

Between February 5, 2014 and February 10, 2014, the average temperature in the lower 48 states fell significantly below normal. Gas and electric heating demand rose as temperatures fell. High demand outside California created negative spreads between Southern California and upstream supply zones. With neighboring supply trading at a premium over Southern California, out-of-state deliveries into the SoCalGas system fell. The decline in out-of-state receipts sharply increased reliance on storage withdrawals, ultimately resulting in the need for the curtailment of standby service to ensure adequate supplies to the SoCalGas system were available.

B. Compliance with SoCalGas' Tariffs

At approximately 8:00 A.M. on February 6, 2014, SoCalGas notified customers that it would be curtailing Standby Procurement Service beginning at 8:00 A.M. on February 6, 2014, and continuing until further notice. This curtailment of Standby Procurement Service was instituted in accordance with Section C.1 of SoCalGas' Rule No. 23, Continuity of Service and Interruption of Delivery, and necessitated by inadequate quantities of gas being delivered into the SoCalGas system.

Section C.1 of SoCalGas' Rule No. 23 provides that:

C. Curtailment of Service**1. Effectuation of Curtailment**

When in the judgment of the Utility, operating conditions require curtailment of service and/or the diversion of customer-owned gas, such curtailment shall be effectuated in the order and manner described below, unless otherwise specified in this rule.

- (1) All Standby Procurement service.

C. Efforts by SoCalGas to Minimize or Alleviate the Curtailment

In response to this situation, SoCalGas took the following steps:

- System was closely monitored due to low out of state receipts;
- Storage field withdrawal was heavily utilized to keep up with load;
- Maintained close contact with the California Independent System Operator on numerous calls with updates on grid requirements and subsequent impact to SoCalGas system with increases in electric generation burn; and
- Requested additional supplies for Southern System reliability as needed.

D. Explanation for the Deficiency in AL 4603.

As noted in Resolution G-3496, D.91-09-026 requires that SoCalGas Advice Letters notifying the Commission of curtailments “*shall state the facts underlying and the reasons for the curtailment, shall demonstrate that the type of curtailment being declared complies with SoCalGas’ tariffs, and shall set forth the efforts SoCalGas has taken to minimize or alleviate the curtailment.*”² D.91-09-026 also requires SoCalGas to file such Advice Letters on the day of the curtailment.”³

SoCalGas apologizes for the fact that AL 4603 did not contain all of the information specified in D.91-09-026. This omission was caused by SoCalGas’ curtailment team focusing on the curtailment itself, and not on the material included in the related notification advice filing. In future curtailments, SoCalGas will endeavor to provide the required information with the notification filing. To that end, we have developed a new curtailment notification template that includes headings A - C above.

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 of this Advice Letter which is October 15, 2015. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

² D.91-09-026, mimeo., at 60-61 (OP No. 1).

³ D.91-09-026, mimeo., at 59 (COL No. 3).

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 the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). 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

Effective Date

SoCalGas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B. It is in compliance with OP 1 of D.91-09-026 and OP 2 of Resolution G-3496. Therefore, SoCalGas respectfully requests that it be made effective on August 27, 2015, which is the date Commission Resolution G-3496 was approved.

Notice

A copy of this Advice Letter is being sent to the General Order 96-B parties listed on Attachment A. In addition, SoCalGas is mailing a copy of this Advice Letter by overnight mail to affected customers or their contracted marketers. Address change requests to the GO 96-B should be directed by electronic mail to tariffs@socialgas.com or call 213-244-3387.

Ronald van der Leeden
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) #: 4603-A

Subject of AL: Partial Supplement: Curtailment of Standby Service on February 6, 2014

Keywords (choose from CPUC listing): Curtailment

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

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

D.91-09-026 and Res. G-3496

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: No _____

.Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 8/27/15

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: N/A

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.