

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 4, 2016

**Advice Letters 4822-G and 4822-G-A**

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

**SUBJECT: Modification of the Tariffs Necessary to Implement Low Operational Flow Order (OFO) and Emergency Flow Order (EFO) Requirements and Description of Forecasting Model in Compliance with Decision (D.) 15-06-004**

Dear Mr. van der Leeden:

Advice Letters 4822-G and 4822-G-A are effective as of December 3, 2015, per Resolution G-3511 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*

December 3, 2015

Advice No. 4822-A  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Partial Supplement: Modification of Tariffs Necessary to Implement Low Operational Flow Order (OFO) and Emergency Flow Order (EFO) Requirements and Description of Forecasting Model in Compliance with D.15-06-004**

Southern California Gas Company (SoCalGas) hereby submits revisions to its tariffs, applicable throughout its service territory, as shown in Attachment A.

**Purpose**

This partial supplement complies with Ordering Paragraph (OP) 2 of Resolution G-3511, which directs SoCalGas to file a Tier 1 Advice Letter (AL) revising Rule No. 30, Section G.1.f.vi, which addresses applicability of the new low OFO and EFO requirements to California producers.

**Background**

On June 27, 2014, SoCalGas and San Diego Gas & Electric Company filed Application (A.) 14-06-021, which requested approval for new low OFO and EFO requirements. Decision (D.) 15-06-004 granted the requested low OFO and EFO requirements. The new requirements include five low OFO stages and one EFO stage, which, when triggered, would require customers to deliver gas within set tolerances or be assessed noncompliance charges. A low OFO or EFO is triggered when the amount of withdrawal capacity allocated to the storage load balancing function is forecasted to be exhausted. The new low OFO and EFO requirements replace the winter balancing rules and obviate the need for standby procurement service curtailment procedures.

SoCalGas filed AL 4822 on June 29, 2015, in compliance with OP 1 of D.15-06-004, which stated:

Within 15 days of the issuance of this decision, San Diego Gas & Electric and Southern California Gas Company shall file Tier 2 advice letters to implement their proposed low Operational Flow Order (OFO) and Emergency Flow Order

(EFO) tariff modifications with a full description of the forecast model to be used to call a low OFO or EFO.<sup>1</sup>

The tariff modifications included as Attachment A to AL 4822 were those necessary to implement D.15-06-004, and included a modification to the Rule No. 30, Section G.1.f.vi language presented in testimony supporting A.14-06-021 to comply with SoCalGas' interpretation of the Commission's intent in D.15-06-004 with respect to applicability of low OFOs and EFOs to California producers.

Resolution G-3511 approved AL 4822, subject to modification.<sup>2</sup> OP 2 requires SoCalGas to "submit a supplemental Tier 1 Advice Letter revising Rule 30, Section G.1.f.vi to clarify that the new Low Operational Flow Order/Emergency Flow Order (OFO/EFO) procedures will be applied to those California gas producers with California Producer Operational Balancing Agreements, Form 6452."<sup>3</sup> Finding 11 of Resolution G-3511 states that "SoCalGas will need to correct the change to Rule 30 as presented in AL 4822 to reflect that the Low OFO/EFO requirements for California gas producers will be implemented according to the terms of any existing producer access agreements."<sup>4</sup> Finally, Resolution G-3511 provides SoCalGas with specific direction that "the redline changes deleting language with regard to California gas producers in the proposed revised Rule No. 30 (Section G.1.f.vi.) as presented in AL 4822 should be eliminated and the original language in the proposed rule maintained."<sup>5</sup> Each of these changes has been incorporated into Rule 30 via the tariff modifications described below.

### **Tariff Modifications**

Pursuant to Resolution G-3511, Section G.1.f.vi. of Rule No. 30 is being modified from the language presented in AL 4822 as follows:

For a California Producer with an effective California Producer Operational Balancing Agreement, Form 6452, compliance with a Low OFO and EFO and calculation of any noncompliance charges will be based on the difference between scheduled receipts and measured receipts for each day of an event. Low OFO and EFO compliance for a California Producer with an existing access agreement will be treated consistent with the terms of that access agreement.

### **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 December 23, 2015. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is given below.

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<sup>1</sup> D.15-06-004, mimeo., at 40.

<sup>2</sup> Resolution G-3511 at 14 (OP 1).

<sup>3</sup> Resolution G-3511 at 14.

<sup>4</sup> Resolution G-3511 at 13-14.

<sup>5</sup> Resolution G-3511 at 6.

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

A copy of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto: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 - 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**

Per OP 1 of Resolution G-3511, this AL is classified as Tier 1 and shall be effective upon filing. SoCalGas respectfully requests that the tariffs be made effective December 3, 2015, which is the day filed.

### **Notice**

A copy of this AL is being sent to the parties to A.14-06-021 and SoCalGas' GO 96-B service list. Address change requests to the GO 96-B should be directed by electronic mail to [tariffs@socalgas.com](mailto:tariffs@socalgas.com), or call 213-244-3387.

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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 904-G)**

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) #: 4822-A

Subject of AL: Partial Supplement: Modification of Tariffs Necessary to Implement Low Operational Flow Order (OFO) and Emergency Flow Order (EFO) Requirements and Description of Forecasting Model in Compliance with D.15 06-004

Keywords (choose from CPUC listing): Affiliates; Compliance

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

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

D.15-06-004 and Resolution G-3511

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: 12/3/15

No. of tariff sheets: 3

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

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: Rule No. 30 and TOCs

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: 4822

**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](mailto:EDTariffUnit@cpuc.ca.gov)

Southern California Gas Company  
Attention: Sid Newsom  
555 West Fifth Street, GT14D6  
Los Angeles, CA 90013-1011  
[SNewsom@semprautilities.com](mailto:SNewsom@semprautilities.com)  
[Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

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

ATTACHMENT A  
Advice No. 4822-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 52142-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 13	Revised 51654-G Revised 47363-G*
Revised 52143-G	TABLE OF CONTENTS	Revised 51967-G
Revised 52144-G	TABLE OF CONTENTS	Revised 52141-G

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Low Operational Flow Orders and Emergency Flow Orders (Continued)

1. Low Operational Flow Order (Low OFO) (Continued)

- f. Low OFO and EFO compliance and charges will be based on the following for determination of daily usage quantities:
  - i. For a Noncore End-Use Customer equipped with automated meter reading device (AMR) and SDG&E's Electric & Gas Fuel Procurement Department, compliance during a Low OFO will be based on actual daily metered usage, and the calculation after the OFO event of any applicable noncompliance charge will be based on actual daily metered usage.
  - ii. For a Noncore End-Use Customer with non-functioning AMR meters, compliance during a Low OFO or EFO will be based on the Customer's actual daily metered usage; or the estimated daily usage in accordance with Section C of SoCalGas Rule 14 will be substituted for the actual daily metered usage when actual metered usage is not available.
  - iii. For a Noncore End-Use Customer without AMR capability compliance during a Low OFO or EFO will be based on the Customer's MinDQ.
  - iv. For the Utility Gas Procurement Department, the Daily Forecast Quantity will be used as a proxy for daily usage.
  - v. For core aggregators, their Daily Contract Quantity will be used as a proxy for daily usage.
  - vi. For a California Producer with an effective California Producer Operational Balancing Agreement, Form 6452, compliance with a Low OFO and EFO and calculation of any noncompliance charges will be based on the difference between scheduled receipts and measured receipts for each day of an event. Low OFO and EFO compliance for a California Producer with an existing access agreement will be treated consistent with the terms of that access agreement.
  
- g. If a Balancing Agent's Low OFO daily gas imbalance exceeds the applicable daily imbalance tolerance by 10,000 therms or less, the Low OFO, noncompliance charge will be zero. If the daily gas imbalance amount exceeds the daily imbalance tolerance by more than 10,000 therms, the Balancing Agent will be responsible for the full noncompliance charge; i.e. 10,000 therms will not be deducted from the daily gas imbalance that exceeds the daily imbalance tolerance. This exemption applies only to Low OFO noncompliance charges

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(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 4822-A  
 DECISION NO. 15-06-004

ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Dec 3, 2015  
 EFFECTIVE Dec 3, 2015  
 RESOLUTION NO. G-3511

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(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 4822-A  
 DECISION NO. 15-06-004

ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
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(Continued)

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