

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 21, 2016

Advice Letter 4978

Sid Newsom
Tariff Manager
Southern California Gas Company
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011

Subject: Temporary Revisions to Rule No. 41, Utility System Operation

Dear Mr. Newsom:

This disposition letter approves Southern California Gas Company's (SoCalGas) Tier 2 Advice Letter (AL) 4978, which requests a temporary preauthorization of baseload contracts to support the Southern System for August and September of 2016 to help meet electric demand needs during peak summer months.

Background: The southern part of the SoCalGas gas transmission pipeline system (the Southern System) requires a minimum amount of flowing supplies to operate reliably. Prior to 2009, the utility's Gas Acquisition Department maintained minimum flowing supplies into the Southern System using core customer assets. This responsibility was transferred to the Utility System Operator (System Operator) by D.07-12-019, effective April 1, 2009.¹

D.07-12-019 also approved the following tools, which can be used by the System Operator to meet Southern System reliability requirements:

- the ability to buy and sell gas on a spot basis as needed;
- the authority and the requirement to conduct at least one annual request for offers (RFO) seeking proposals for managing minimum flows; and
- the authority to submit an Advice Letter for approval of contracts that result from an RFO or open season process.

Subsequent resolutions authorized additional tools and specified certain conditions.

One of those tools was preauthorized baseload contracts. Resolution G-3487 approving AL 4516, issued on October 7, 2013, gave the System Operator the authority to enter into baseload gas contracts in order to improve Southern System reliability provided they meet certain criteria as described in SoCalGas Rule 41. Preauthorization of baseload contracts under Rule 41 expired on

¹ As stated in Rule 41, the mission of the Utility System Operator is to maintain system reliability and integrity while minimizing costs at all times. The System Operator includes all of the departments within SoCalGas and San Diego Gas & Electric Company that are responsible for the physical and commercial operation of the pipeline and storage systems and specifically excludes the Utility Gas Procurement Department.

March 31, 2016. By Advice Letter 4970, SoCalGas requested reauthorization of Rule 41 baseload natural gas contract program, which was granted by the Energy Division on July 8, 2016.

Discussion: In AL 4978, SoCalGas essentially requests authorization to engage in the same types of baseload contracts as have been preapproved under Rule 41, except here the utility requests preauthorization of contracts:

- during August and September of 2016; and
- limited to 200,000 MMcf/d of baseload contracts per month instead of the 255,000 MMcf/d in winter baseload contracts.

SoCalGas publicly proposed summer baseload contracts during its June 2, 2016, Customer Forum, and this proposal was formally supported by the Southern California Public Power Authority (SCPPA) in its comments regarding AL 4970. SCPPA asserted that SoCalGas should pursue preapproval of summer baseload contracts “to maintain system reliability for the duration of Aliso Canyon’s unavailability.” (SCPPA Protest of AL 4970 at p. 2.)

In support of this AL, SoCalGas analyzed the summer of 2012 (July 1 through September 30), which it believes to be an approximate proxy for 2016 summer natural gas procurement conditions. SoCalGas found that, had 200,000 dth/d of baseload contracts been utilized rather than spot-purchases and Backbone Transportation Service (BTS) discounts, ratepayer savings of \$1.3 million could have been realized. Of that total, \$780,000 in savings would have occurred in August and September of 2012.

The uncertainty surrounding the Aliso Canyon gas storage facility increases the importance of baseload contracts during summer peak energy usage periods as well as winter peak gas usage periods.

On October 23, 2015, a major gas leak was discovered at the Aliso Canyon gas storage facility. On January 21, 2016, the Commission ordered SoCalGas to continue to reduce the amount of gas in storage until the working gas inventory at Aliso Canyon reached 15 billion cubic feet (Bcf). At this time, SoCalGas is not allowed to inject gas into any of the wells at this facility.

On January 6, 2016, Governor Brown proclaimed a state of emergency in Los Angeles County due to the prolonged duration of the natural gas leak at Aliso Canyon. Paragraph 10 of the Proclamation states that: “The California Public Utilities Commission and the California Energy Commission, in coordination with the California Independent System Operator, shall take all actions necessary to ensure the continued reliability of natural gas and electricity supplies in the coming months during the moratorium on gas injections into the Aliso Canyon Storage Facility.”

On April 5, 2016, the California Energy Commission (CEC), The California Public Utilities Commission (CPUC), California Independent System Operator (CAISO), and the Los Angeles Department of Water and Power (LADWP) released the *Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin* (“Action Plan”). The Action Plan finds that “Aliso Canyon plays an essential role in maintaining both natural gas and electric reliability in the greater Los Angeles area. As a result, the facility’s limited current operations create a distinct possibility of electricity service interruptions in the coming summer months.” The

accompanying report and technical studies predict that the region faces up to 14 days this coming summer during which gas curtailments could be high enough to cause electricity service interruptions to millions of utility customers.²

Comments on AL 4978: Shell Energy North America (US), L.P. ("Shell Energy") and the Alliance for Retail Energy Markets ("AREM") filed comments on July 8, 2016,³ regarding AL 4978. The respondents commended SoCalGas' for seeking authority for baseload contracts for August and September of 2016 and agreed that summer baseload contracts would support minimum flows in the Southern System when the emergent and unanticipated Aliso Canyon unavailability could create relatively low gas supply this summer.

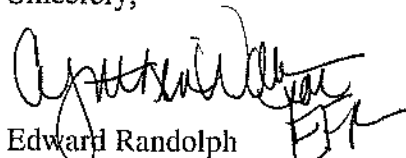
Shell and AREM further urge the Commission to encourage SoCal Gas to seek further tariff changes discussed at the June 2, 2016, Customer Forum but not included in SoCalGas' AL 4978 regarding the trading of daily imbalances.

Commission Staff may reject all or part of a protest to an AL on a variety of grounds as discussed in General Order ("G.O.") 96-B, General Rule 7.4.2. Shell and AREM do not point to any statute or Commission order that may serve as a basis for Energy Division staff to approve such additional measures regarding the trading of daily imbalances proposed in their comments on AL 4978. Energy Division rejects the portion of the Shell and AREM comments proposing additional authority through the Commission's AL process because this proposal does not appear to be supported by any statute or Commission order and would thus likely require additional, more formal proceedings to properly obtain approval.

Conclusion: With the future of Aliso Canyon uncertain, baseload contracts are critical for ensuring that a sufficient quantity of reasonably priced gas reaches the Southern System in order to fuel the generation of electricity during peak electric-use periods and avoid electric service interruptions during the summer of 2016.

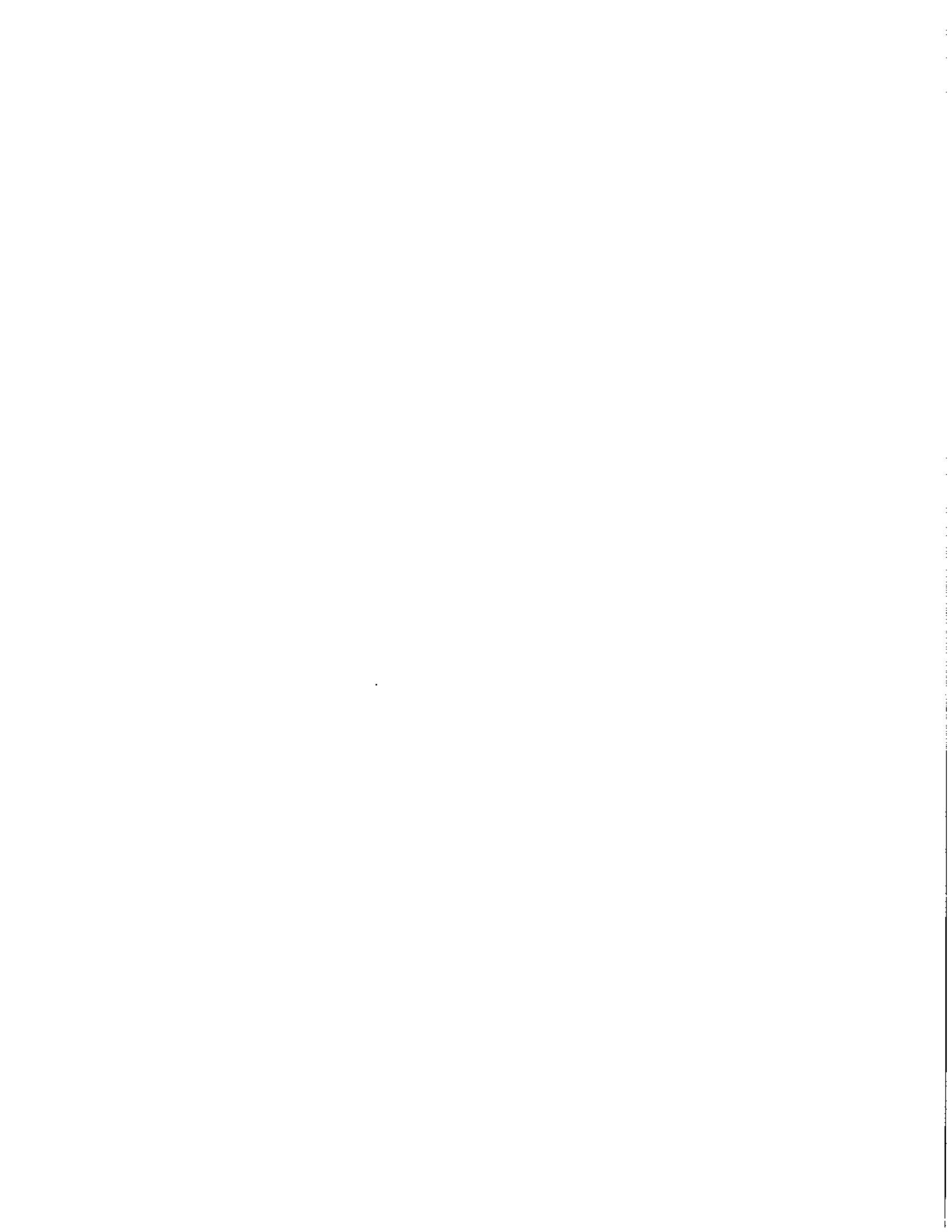
Advice Letter 4978 is approved.

Sincerely,


Edward Randolph
Director, Energy Division

² See Page 3 of the *Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin*, prepared by the California Public Utilities Commission, California Energy Commission, the California Independent System Operator, and the Los Angeles Department of Water and Power, available at: [http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/Aliso%20Canyon%20Action%20Plan%20\(04-4-16\)_final%20clean.pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/Aliso%20Canyon%20Action%20Plan%20(04-4-16)_final%20clean.pdf)

³ By letter dated July 1, 2016, pursuant to Rule 1.3 of California Public Utilities Commission's General Order 96-B, the Energy Division shortened the protest and reply period on AL 4978 to July 8, 2016, in order to allow expeditious review and consideration of any such protests and timely approval of AL 4978 by the July 25, 2016, start of bidweek for August 2016 baseload contracts.





Ronald van der Leeden

Director

Regulatory Affairs

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June 22, 2016

Advice No. 4978
(U 904 G)

Public Utilities Commission of the State of California

Subject: Temporary Revisions to Rule No. 41, Utility System Operation

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC) proposed revisions to its Rule No. 41, Utility System Operation, applicable throughout its service territory, as shown on Attachment A.

Purpose

SoCalGas requests authorization to revise Rule No. 41 to provide SoCalGas temporary preauthorization to enter into baseload contracts for August and September of 2016 to support Southern System reliability due to the limited availability of Aliso Canyon.

Background

In Resolution G-3477, the CPUC preauthorized SoCalGas to enter into Southern System support baseload contracts that meet a defined set of criteria. This authority is described in SoCalGas' Rule No. 41:

Should the Operational Hub deem it necessary or advisable to enter into baseload contracts for Southern System support at one or more of the Southern System receipt points, the Operational Hub shall be deemed to have made reasonable baseload purchases if: (1) the total cumulative baseload volumes at any time are less than or equal to 255,000 Dth/day; (2) the price is less than or equal to NGI's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth for the relevant baseload month(s); (3) the term is for the December - March period, or any subset of that period; and (4) the baseload contracts can only be made for one season at a time and only within the nine month period directly preceding that season. The Operational Hub shall be deemed to have made reasonable sales of such baseload gas if: (1) for baseload sales, the sale price is greater than or equal to 90% of NGI's Bidweek average for "SoCal Citygate" for the relevant baseload month(s); and (2) for spot sales, the sale price is greater than or equal to 90% of the ICE Wtd Avg

Index for the relevant trading point and trading period. This provision shall expire on March 31, 2016, unless extended by the Commission. SoCalGas may seek extension or modification of this provision by standard advice filing or application.¹

The Commission granted this authorization in Resolution G-3477 because baseload contracts "provide an efficient method to manage Southern System minimum flow requirements."²

SoCalGas' preauthorization to enter into winter baseload contracts for Southern System support ended on March 31, 2016. SoCalGas requested an extension of this winter baseload preauthorization for another three years by Advice No. (AL) 4970. Winter baseload contracts have helped SoCalGas to provide reliable Southern System service at a reasonable cost in recent years.

Requested Authorization

A. 2016 Customer Forum Presentation

At the 2016 SoCalGas Customer Forum held on June 2, 2016, SoCalGas gave a presentation regarding the potential benefits of baseload contracts to support Southern System minimum flows during the summer of 2016. The presentation by SoCalGas during the Customer Forum explained that for a three-month term (July-September), baseload contracts could potentially provide up to \$1.3 million of savings compared with spot purchases. After this presentation, one customer group asked SoCalGas to prepare a detailed financial analysis regarding the potential benefits from baseload contracts for this upcoming summer, and no customer or customer group spoke out against the proposal.

B. SPPA Proposal

On June 13, 2016, the Southern California Public Power Authority (SPPA) filed a protest to AL 4970, which urged the Commission "to order SoCalGas to supplement its filing to include the ability to enter into baseload contracts at the SoCalGas Ehrenberg facility starting July 1, 2016 and through the summer season to maintain system reliability for the duration of Aliso Canyon's unavailability."³ SPPA further noted that "such action must be promptly pursued with all expediency as an additional action to mitigate reliability risks due to the unavailability of Aliso Canyon."

SoCalGas appreciates SPPA's support for baseload contracts this summer. But, because SoCalGas did not seek authorization in AL 4970 to enter into such contracts, or provide any justification for this new tool, SoCalGas believes that Southern System baseload contracts for the summer of 2016 should be considered independently of AL 4970.

¹ SoCalGas Rule No. 41, Section 20.

² Resolution G-3477 at 18, Finding of Fact 14.

³ SPPA Protest of AL 4970 at 2.

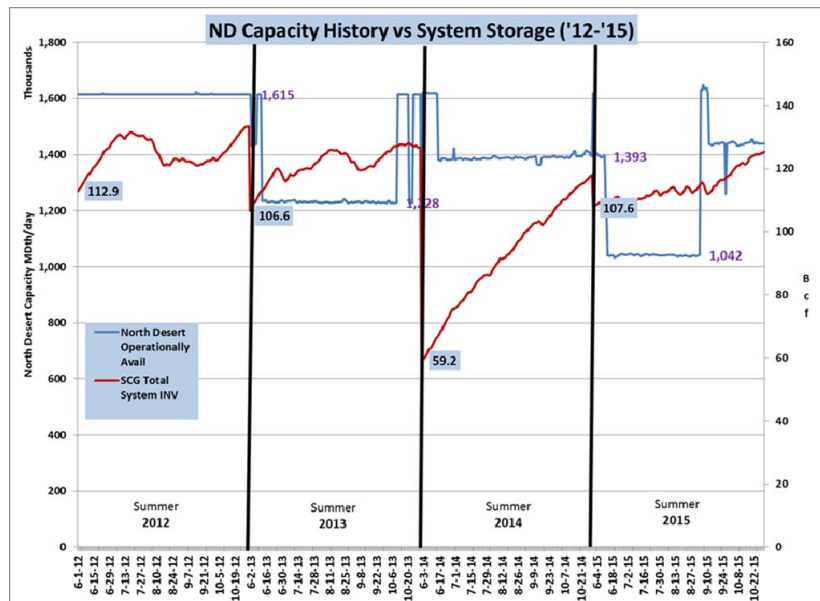
C. 2016 Summer Baseload Contract Proposal

For the reasons presented during our 2016 annual Customer Forum, and further explained below, SoCalGas believes that a limited level of baseload contracts to support minimum flows on the Southern System are likely to result in lower costs than spot purchases alone. Accordingly, SoCalGas is seeking Commission preauthorization to enter into such contracts for August and September of 2016.

1. Analysis

SoCalGas analyzed the summer of 2012 (July 1 through September 30), and found that, had 200,000 dth/d of baseload contracts been utilized rather than spot-purchases and Backbone Transportation Service (BTS) discounts, ratepayer savings of \$1.3 million could have been realized. Of that total, \$780,000 in savings would have occurred in August and September. This analysis is presented in Attachment B to this advice filing.

SoCalGas believes that 2012 is an appropriate proxy for 2016 summer baseload contracts. Like the summer of 2012, we will likely have relatively low Southern System supply this summer for two reasons: (1) there were low injection rates in 2012 because of a high starting system storage inventory of 98 Bcf on April 1, 2012, and there will be low injection rates in 2016 because of ongoing Aliso Canyon restrictions; and (2) North Desert capacity was fully available in 2012 so that customers did not need to rely heavily on Southern System supply, and North Desert capacity is also fully available in 2016. The chart below illustrates these similarities:



Because July 2016 bidweek ended on June 24, 2016, preauthorized baseload contracts are no longer a possibility for July of 2016. But SoCalGas believes that 200,000 MMcf of

baseload contracts for August and September of 2016 could still provide financial benefits of up to \$780,000 compared with spot purchases alone.

2. Proposal

For the reasons just described, SoCalGas respectfully requests preauthorization to enter into up to 200,000 MMcfd of baseload contracts for August and September of 2016. These summer baseload purchases would be deemed reasonable if they satisfy the same criteria as winter baseload contracts—i.e., that the contract price is less than or equal to NGL's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth, and baseload sales satisfy the same criteria as winter sales. The terms and conditions of this preauthorization would be specified in the following new Section 29 that would be added to SoCalGas' Rule 41:

29. Should the Operational Hub deem it necessary or advisable to enter into baseload contracts for Southern System support at one or more of the Southern System receipt points, the Operational Hub shall be deemed to have made reasonable baseload purchases if: (1) the total cumulative baseload volumes at any time are less than or equal to 200,000 Dth/day; (2) the price is less than or equal to NGL's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth for the relevant baseload month(s); and (3) the term is for the August - September period, or any subset of that period. The Operational Hub shall be deemed to have made reasonable sales of such baseload gas if: (1) for baseload sales, the sale price is greater than or equal to 90% of NGL's Bidweek average for "SoCal Citygate" for the relevant baseload month(s); and (2) for spot sales, the sale price is greater than or equal to 90% of the ICE Wtd Avg Index for the relevant trading point and trading period. This provision shall expire on September 30, 2016, unless extended by the Commission.

Bidweek for August 2016 contracts will start on July 25, 2016, and if Commission authorization is not provided by that date, there will be no longer be an opportunity for SoCalGas to enter into August 2016 baseload contracts for Southern System support. Bidweek for September 2016 contracts will start on August 25, 2016. If Commission authorization is not provided by that date, this advice filing will be moot.

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, which is July 12, 2016. 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 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 that this filing is subject to Energy Division disposition, and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. This filing is consistent with Decision 07-12-019. Therefore, SoCalGas respectfully requests that this filing be approved on July 22, 2016, which is thirty (30) calendar days after the date filed.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service lists in the most recent Triennial Cost Allocation Proceeding (TCAP), A.15-07-014, as well as the 2013 TCAP, A.11-11-002. Address change requests to the GO 96-B should be directed by electronic mail to tariffs@socalgas.com or call 213-244-3387. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

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) #: 4978

Subject of AL: Temporary Revisions to Rule No. 41, Utility System Operation

Keywords (choose from CPUC listing): Reliability

AL filing type: Monthly Quarterly Annual One-Time Other

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

Decision 07-12-019 and Resolution G-3477

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: 7/22/16

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. 41 and TOCs

Service affected and changes proposed¹: See Advice Letter.

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 Fifth 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. 4978

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 52721-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 10	Revised 52681-G
Revised 52722-G	TABLE OF CONTENTS	Revised 52683-G
Revised 52723-G	TABLE OF CONTENTS	Revised 52720-G

TABLE OF CONTENTS

(Continued)

RULES (continued)

26	Consumer Responsible for Equipment for Receiving and Utilizing Gas	45843-G
27	Service Connections Made by Company's Employees	24657-G
28	Compensation to Company's Employees	24658-G
29	Change of Consumer's Apparatus or Equipment	24659-G
30	Transportation of Customer-Owned Gas	47193-G,51792-G,51793-G,51794-G 52672-G,51796-G,51797-G,51798-G,51799-G,47360-G 51652-G,52673-G,52674-G,52675-G,52676-G,52677-G 51658-G,51659-G,51660-G,51661-G,51662-G,51663-G 51664-G,51665-G,51666-G,51667-G,51668-G,52678-G
31	Automated Meter Reading	46062-G,46063-G
32	Core Aggregation Transportation	50951-G,50952-G,50953-G,50954-G 50955-G,50956-G,50957-G,50958-G,50959-G,50960-G 50961-G,50962-G,50963-G,50964-G,50965-G,50966-G 50967-G,50968-G,50969-G
33	Electronic Bulletin Board (EBB)	47202-G,43389-G,45392-G,47203-G 45394-G,45395-G,45396-G,45397-G,45398-G
34	Provision of Utility Right-of-Way Information	33298-G,33299-G,33300-G 33301-G,33302-G,33303-G
35	Contracted Marketer Transportation	27068-G,27069-G,27070-G,27071-G 36325-G,27073-G,36326-G,27075-G
36	Interstate Capacity Brokering	39590-G,39591-G
38	Commercial/Industrial Equipment Incentive Program	32745-G,50487-G,32747-G,32748-G,32749-G
39	Access to the SoCalGas Pipeline System	51962-G,-G,51963-G,51964-G,51965-G,51966-G
40	On-Bill Financing Program	44205-G,41155-G
41	Utility System Operation	51670-G,51671-G,52679-G,52680-G,51674-G 51675-G,51676-G,52598-G,51678-G,52721-G
42	Privacy and Security Protections for Energy Usage Data	50587-G,50588-G,50347-G,50348-G,50349-G 50350-G,50351-G,48636-G,48637-G,50352-G,50589-G 50590-G,50591-G,50592-G,50593-G,50594-G,50595-G
43	On-Bill Repayment (Pilot Programs)	51825-G,50796-G,50797-G,51826-G 51827-G,51828-G,51829-G,51830-G
44	Mobilehome Park Utility Upgrade Program	50890-G,50728-G,50729-G,50891-G 50892-G,50893-G,50894-G,50895-G,50896-G

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4978
 DECISION NO.

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Jun 22, 2016
 EFFECTIVE Jul 22, 2016
 RESOLUTION NO. G-3477

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.

GENERAL

Cal. P.U.C. Sheet No.

Title Page	40864-G	
Table of Contents--General and Preliminary Statement	52723-G,52588-G,52589-G,52590-G	T
Table of Contents--Service Area Maps and Descriptions	41970-G	
Table of Contents--Rate Schedules	52705-G,52719-G,52687-G	
Table of Contents--List of Cities and Communities Served	51971-G	
Table of Contents--List of Contracts and Deviations	51971-G	
Table of Contents--Rules	52360-G,52722-G	T
Table of Contents--Sample Forms	52558-G,52363-G,51537-G,51833-G,50598-G	

PRELIMINARY STATEMENT

Part I General Service Information	45597-G,24332-G,24333-G,24334-G,48970-G
Part II Summary of Rates and Charges	52689-G,52690-G,52691-G,52183-G,52184-G,52717-G 52712-G,46431-G,46432-G,52164-G,52645-G,52646-G,52647-G,52189-G
Part III Cost Allocation and Revenue Requirement	52190-G,50447-G,50448-G
Part IV Income Tax Component of Contributions and Advances	52273-G,24354-G
Part V Balancing Accounts	
Description and Listing of Balancing Accounts	51893-G
Purchased Gas Account (PGA)	51641-G,49672-G
Core Fixed Cost Account (CFCA)	51352-G,52666-G,52667-G
Noncore Fixed Cost Account (NFCA)	51354-G,52668-G,52669-G
Enhanced Oil Recovery Account (EORA)	49712-G
Noncore Storage Balancing Account (NSBA)	50450-G,50451-G
California Alternate Rates for Energy Account (CAREA)	45882-G,45883-G
Hazardous Substance Cost Recovery Account (HSCRA)	40875-G, 40876-G,40877-G
Gas Cost Rewards and Penalties Account (GCRPA)	40881-G
Pension Balancing Account (PBA)	49309-G,49310-G
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA) .	49311-G,49312-G
Research Development and Demonstration Surcharge Account (RDDGSA).....	40888-G
Demand Side Management Balancing Account (DSMBA).....	45194-G,41153-G
Direct Assistance Program Balancing Account (DAPBA)	52583-G,52584-G
Integrated Transmission Balancing Account (ITBA)	49313-G

(Continued)

(TO BE INSERTED BY UTILITY)
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ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
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ATTACHMENT B

Advice No. 4978

Analysis

ANALYSIS

Base Load Volume: 200,000												BaseLoad									
Actual			WITH BASELOAD					Volume			Buy Price		Sell Price								
Spot	BTS	Total	BaseLoad	Spot	Total	Volume	Volume	Volume	Volume	Volume	Volume	Volume	Volume	Volume	Volume						
Volume	Cost	Discount	Volume	Cost	Volume	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost	Cost						
Q3-2012	3,577,745	\$1,010,843	\$2,150,361	18,400,000	\$1,803,562	64,811	\$24,303	1,827,864	\$1,322,497	201207	200,000	2.95	2.97	201208	200,000	3.13	3.16	201209	200,000	2.86	2.88

ACTUALS																
SPOT PURCHASES																
flow date	Strip	Request	FIRM BTS	IT BTS	Volume (Dth)	Inkind	Volume Net Of Inkind	BTS Cost	Avg. Purchase Price	Total Purchase Cost	Volume (Dth)	Avg Sale Price	Revenue From Sales	Net Spot Cost		
7/1/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/2/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/3/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/4/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/5/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/6/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/7/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/8/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/9/2012	201207	40000	0.11042	0.05	40000	151.6	39848.4	1992.42	3.02625	123042.42	39848	3.02251	120441	2601.46		
7/10/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/11/2012	201207	30000	0.11042	0.05	30000	113.7	29886.3	1494.315	3.03	92394.315	69884	2.978627	208158.3	-115764		
7/12/2012	201207	120000	0.11042	0.05	120000	454.8	119545.2	5977.26	3.14875	383827.26	34600	3.01578	104346	279481.3		
7/13/2012	201207	25000	0.11042	0.05	25000	94.75	24905.25	1245.2625	3.09	78495.263	68784	3.007906	206895.8	-128401		
7/14/2012	201207	45000	0.11042	0.05	45000	170.55	44829.45	2241.4725	3.12	142641.47	0	0	0	0	0	0
7/15/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/16/2012	201207	45000	0.11042	0.05	44999	170.54621	44828.454	2241.4227	3.1622216	144538.23	40000	2.965	118600	25938.23		
7/17/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	50708	2.751872	139811.2	-139811		
7/18/2012	201207	30000	0.11042	0.05	30000	113.7	29886.3	1494.315	2.82	86094.315	0	0	0	0	0	0
7/19/2012	201207	160000	0.11042	0.05	160000	606.4	159393.6	7969.68	3.33875	542169.68	64299	2.915785	187482.1	354687.6		
7/20/2012	201207	220000	0.11042	0.05	219999	833.79621	219165.2	10958.26	3.395459	757954.72	263872	2.957924	780513.2	-22358.5		
7/21/2012	201207	150000	0.11042	0.05	150000	568.5	149431.5	7471.575	3.379933	514461.58	86565	3.062742	265126.3	249355.3		
7/22/2012	201207	135000	0.11042	0.05	134956	511.48324	134444.52	6722.2258	3.3479334	458535.27	116565	3.069758	357826.3	100709		
7/23/2012	201207	245000	0.11042	0.05	244812	927.83748	243884.16	12194.208	3.3673679	836566.29	126565	3.072147	388826.3	447740		
7/24/2012	201207	175000	0.11042	0.05	175000	663.25	174336.75	8716.8375	3.4634286	614816.84	358500	3.123849	1119900	-505083		
7/25/2012	201207	175000	0.11042	0.05	175000	663.25	174336.75	8716.8375	3.5726286	633926.84	111935	3.188376	356890.9	277035.9		
7/26/2012	201207	145000	0.11042	0.05	144999	549.54621	144449.45	7222.4727	3.3413793	491719.13	224066	3.190878	714967.2	-223248		
7/27/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	76897	3.134714	241050.1	-241050		
7/28/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/29/2012	201207	0	0.11042	0.05	0	0	0	0	0	0	0	0	0	0	0	0
7/30/2012	201207	110000	0.11042	0.05	109383	414.56157	108968.44	5448.4219	3.3320891	369923.22	0	0	0	369923.22		
7/31/2012	201207	100000	0.11042	0.05	100000	379	99621	4981.05	3.34	338981.05	109491	3.154659	345406.7	-6425.69		
8/1/2012	201208	150000	0.11042	0.03	150000	587	154413	4632.39	3.34	523232.39	99785	3.237516	323055.6	199276.8		
8/2/2012	201208	160000	0.11042	0.03	160000	606	159394	4781.82	3.32	535981.82	154400	3.226477	498168	37813.82		
8/3/2012	201208	150000	0.11042	0.03	150000	568	149432	4482.96	3.26	493482.96	159300	3.21	511353	-17870		
8/4/2012	201208	20000	0.11042	0.03	20000	76	19924	597.72	3.2	64597.72	49800	3.01	149898	-85300.3		
8/5/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	49800	3.01	149898	-149898		
8/6/2012	201208	130000	0.11042	0.03	130000	493	129507	3885.21	3.25	426385.21	139800	3.080815	430698	-4312.79		
8/7/2012	201208	200000	0.11042	0.03	193599	734	192865	5785.95	3.323556	662542.6	147000	3.181224	467640	194932.6		
8/8/2012	201208	200000	0.11042	0.03	200000	759	199241	5977.23	3.412	688377.23	100000	3.2	320000	368377.23		
8/9/2012	201208	180000	0.11042	0.03	180000	683	179317	5379.51	3.4	617379.51	233300	3.201505	746911	-129531		
8/10/2012	201208	180000	0.11042	0.03	180000	683	179317	5379.51	3.4966667	634779.51	150000	3.18	477591	157779.5		
8/11/2012	201208	30000	0.11042	0.03	30000	114	29886	896.58	3.25	98396.58	59700	3.151675	188155	-89758.4		
8/12/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	59700	3.151675	188155	-188155		
8/13/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	89700	3.144426	282055	-282055		
8/14/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/15/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/16/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/17/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/18/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/19/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/20/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/21/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/22/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/23/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	195	3.03	590.85	-590.85		
8/24/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/25/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/26/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/27/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	0	0	0	0	0	0
8/28/2012	201208	30000	0.11042	0.03	29998	114	29884	896.55	3.05	92390.45	2500	2.93	7325	85065.45		
8/29/2012	201208	70000	0.11042	0.03	70000	265	69735	2092.05	3.1457143	222292.05	25218	2.94	74140.32	148151.1		
8/30/2012	201208	130000	0.11042	0.03	130000	493	129507	3885.21	3.1465385	412935.21	90000	2.963333	266700	146235.2		
8/31/2012	201208	0	0.11042	0.03	0	0	0	0	0	0	111406	2.990252	333132.1	-333132		

WITH BASELOAD																			
SPOT PURCHASES																			
Volume (Dth)	Inkind	Volume Net Of Inkind	Firm BTS Cost	Avg. Purchase Price	Total Purchase Cost	Volume (Dth)	Avg Sale Price	Revenue From Sales	Net Cost	Volume (Dth)	Inkind	Volume Net Of Inkind	IT BTS Cost	Avg. Purchase Price	Total Purchase Cost	Volume (Dth)	Avg Sale Price	Revenue From Sales	Net Cost
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	22000.3	2.95	612000.3	199242	2.97	591748.7	20251.56	0	0	0	0	0	0	0	0	0	0
200000	758	199242	2200																

