

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 14, 2017

Advice Letter 5040-G

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

SUBJECT: 2016 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (September 1, 2015 through August 31, 2016)

Dear Mr. van der Leeden:

Advice Letter 5040-G is effective as of August 10, 2017, per Resolution G-3525 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
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October 3, 2016

Advice No. 5040
(U 904 G)

Public Utilities Commission of the State of California

Subject: 2016 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (September 1, 2015 through August 31, 2016)

Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) its 2016 Annual Compliance Report (ACR) to demonstrate that activities to maintain Southern System reliability from September 1, 2015 through August 31, 2016 are in compliance with the standards, criteria, and procedures described in Sections 11 through 21 of SoCalGas Rule No. 41.

Background

Pursuant to SoCalGas Rule No. 41, Section 27, SoCalGas is to submit an ACR on October 1 of each year regarding its Southern System reliability procurement activities for the previous 12-month period ending on August 31:

On October 1 of each year, the Utility shall provide a report ("Annual Compliance Report") demonstrating that the Operational Hub's procurement activities during the preceding twelve months ending August 31 were in compliance with the standards, criteria and procedures described in Sections 9 through 19 above.¹ The Annual Compliance Report shall be submitted to the Energy Division by Advice Letter and shall be subject to comment or protest. Upon Energy Division review and verification of the Annual Compliance Report and the CPUC Resolution approving the Annual Compliance Report, all the transactions entered into the SRMA balance for the year in question that are found reasonable by the Energy Division

¹ After the adoption of this provision SoCalGas added new sections to Rule No. 41, and the existing Sections 9 and 19 were changed to Sections 11 and 21, respectively. The text in both these sections was not changed, just the numbering.

shall be amortized in customer transportation rates over the following year.²

In Resolution G-3480 (relating to SoCalGas' 2012 ACR), the Commission provided additional direction regarding the content of future ACRs:

[F]uture ACRs should include a narrative statement and a table in the text of the report presenting the number and percent of transactions by the Section of Rule 41 under which SoCalGas asserts the transactions to be reasonable. A narrative explanation for any transaction not meeting the requirements of Sections 13 and 14 should be included in any future ACR, and supplemented with additional exhibits and documentation as appropriate.

SoCalGas shall incorporate, in all future ACRs, a table, as described in ordering paragraph 3.(b) and narrative explanations supported by appropriate documentation for any transactions to be evaluated as reasonable under Section 15 of Rule 41.³

Discussion

In accordance with Rule No. 41, SoCalGas hereby submits its ACR for the 12-month period ending August 31, 2016. SoCalGas believes that all of the transactions described in this ACR are reasonable and subject to amortization in customer transportation rates during 2017.

A. Transaction Overview

As shown in Attachment A, from September 1, 2015 through August 31, 2016, SoCalGas spent \$5,128,103 to help satisfy Southern System minimum flow requirements. SoCalGas purchased 39,158,590 dths (net of in-kind fuel) of gas at Ehrenberg for \$95,719,175. This gas was then resold at the SoCal Citygate for \$97,027,495 for a net gain of \$1,308,320. In addition to this net purchase gain, the System Operator incurred \$6,436,422 of transportation charges.

² This provision is the result of D.09-11-006, which adopted SoCalGas' 2009 BCAP Phase Two Settlement Agreement. The acronym "SRMA" in the quotation above refers to SoCalGas' System Reliability Memorandum Account. As explained in Rule No. 41, Section 22, "The cost and revenues of Operational Hub transactions (e.g., natural gas purchases, sales, or exchanges resulting from approved contracts) that are necessary to meet minimum flow requirements shall be recorded in the System Reliability Memorandum Account (SRMA)."

³ Resolution G-3480 at 11-12 and 12-13. After the issuance of this resolution SoCalGas added new sections to Rule No. 41, and the existing Section 13, 14, and 15 were changed to Sections 15, 16, and 17, respectively. The text of these sections was not changed, just the numbering.

B. Transaction Detail

Attachment B provides the details of the purchases and sales summarized in Attachment A.⁴ Table 1 below shows that 3% of purchase transactions were within the automatic safe harbor price limits for spot gas purchases and resales described in Section 15 of Rule No. 41. Another 5% were within parameters for spot gas purchases described in Section 16 of Rule No. 41.⁵ There were two very small Section 17 transactions (deliveries at Otay Mesa) on June 21st and 22nd. All four winter baseload contracts, representing 73% of purchases, were within the parameters described in Section 20 of Rule No. 41.⁶ The remaining 18% of purchases (comprised of nine August baseload contracts) were within the parameters described in Section 29 of Rule No. 41.⁷

⁴ Attachment B includes the cycle in which the transaction was executed (for purchases to be evaluated as reasonable under Section 13 (currently re-numbered as Section 15) of Rule No. 41) per Resolution G-3504, Ordering Paragraph No. 2.

⁵ Pursuant to Section 16, *"When less than the required volumes are available on ICE, the Operational Hub shall contact gas suppliers (other than the Utility Gas Procurement Department or affiliates), request offers for the necessary supplies, and record their offers for gas delivered to the relevant trading points to ensure at least three offers from three different suppliers are available for comparison."*

⁶ These four contracts were with four suppliers. Section 20 states: *"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."*

⁷ Section 29 states: *"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 NGI'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 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."*

	# Transactions	%	\$	%
Section 15	25	30%	\$3,255,629	3%
Section 16	44	52%	\$4,765,892	5%
Section 17	2	2%	\$88,450	0.1%
Section 20	4	5%	\$70,335,846	73%
Section 29	9	11%	\$17,273,358	18%
Total	84	100%	\$95,719,175	100%

The average net cost (purchase price minus sale price plus transport cost) of the spot gas purchases (Sections 15, 16, and 17) was 79 cents/dth.⁸ The average net cost of the baseload purchases (Sections 20 and 29) was 9 cents/dth.⁹ Seventy percent of the necessary spot gas purchases were made in July 2016—a peak electric generation month that was not covered by any baseload contract commitments.¹⁰

All sales transactions had prices that were within the automatic safe harbor provisions described in Sections 15, 20, and 29 of Rule No. 41.

On July 8, 2016, the Commission approved SoCalGas' Advice Letter (AL) 4970 (in a disposition letter) authorizing SoCalGas a three-year extension of preauthorization of winter baseload contracts to support the Southern System until March 31, 2019. The commission determined that over the last three years, preauthorized baseload contracts have acted as an effective insurance policy protecting ratepayers from volatility in the spot market.¹¹ The cost effectiveness of winter baseload contracts for the winter of 2015/16 is shown in Attachment B to AL 4970.

Attachment B shows there were at least three offers from three different suppliers that were available for comparison before completing Section 16 spot gas purchases.

Attachment C shows the ICE calculations for the Section 15 purchases and sales.¹²

All spot gas purchases were in response to System Operator requests for supply as documented in Attachment D. None of these requests mention any relationship to Aliso Canyon. In addition, the chart below shows that the Southern System minimum over this ACR period was not significantly different than under the prior ACR period in which the Aliso storage facility was fully functional. Therefore, we conclude that none of the \$5.13 million Southern System support costs over this period were attributable to events at the Aliso Canyon storage facility.¹³

⁸ See Attachment B, Cell S126.

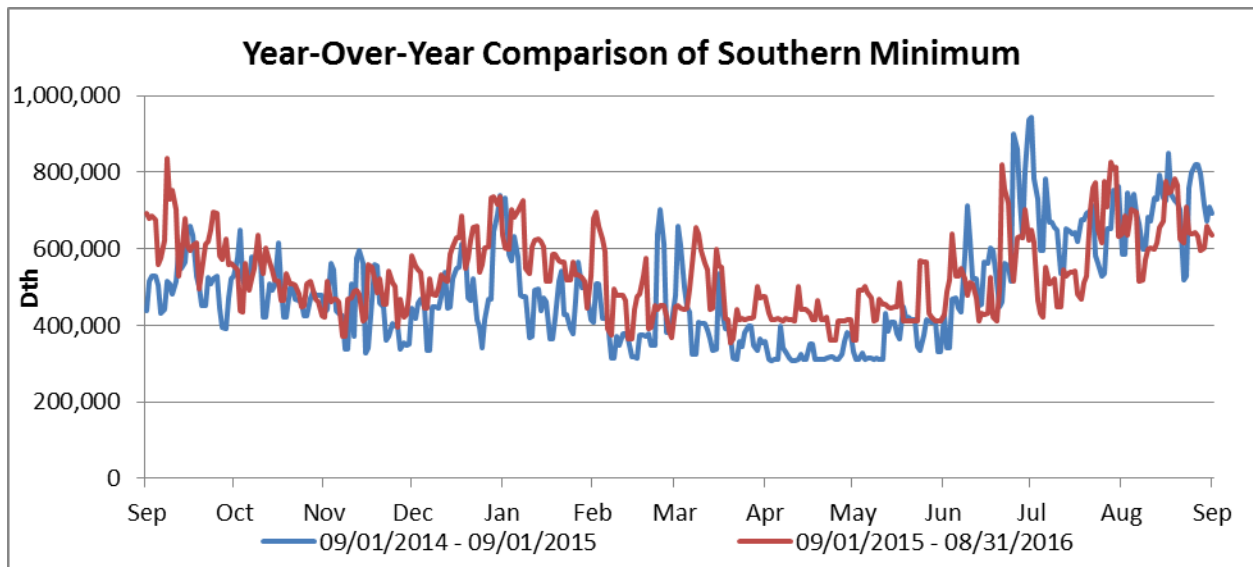
⁹ See Attachment B, Cell S197.

¹⁰ See Attachment B, Cell G124.

¹¹ See page 3 of Disposition Letter, approving AL 4970.

¹² Section 15 (a) is applicable to Cycles 1 & 2 (Cycle 2 ends at 4:00 p.m. on the day preceding the flow date.) Section 15 (b) is applicable to Cycles 3-5 which are the intraday market.

¹³ See Resolution G-3514, Ordering Paragraph No. 3.



Attachment E shows data required by Resolution G-3504, OP. 3:

- a. NGI's Bidweek average for "Southern Cal. Bdr. Avg.";
- b. NGI's Bidweek average for "Southern Cal. Bdr. Avg." + 8.2 cents/dth;
- c. NGI's Bidweek average for "SoCal Citygate"; and
- d. 90% of NGI's Bidweek average for "SoCal Citygate."

Confidential Attachment G provides the same information as Attachment B - details of the purchases and sales summarized in Attachment A - and adds counterparty names. These counterparty names are confidential and being submitted only to the Energy Division pursuant to the confidentiality provisions of General Order (GO) 66-C and Section 583 of the Public Utilities Code.

C. Over-nomination Event Information

In Resolution G-3486 (issued December 6, 2013), the Commission approved a proposed revision to SoCalGas' Rule No. 30 to clarify the procedures used in situations where there is a system-wide over-nomination yet additional supplies are needed on SoCalGas' Southern System. The Commission required that SoCalGas provide information concerning the impact of the Rule No. 30 revision in future ACRs. This information includes: a) the frequency of events where over-nominations occurred system-wide yet the System Operator was required to maintain minimum flows to the Southern System; b) the effectiveness of the 10% margin of error and any need to increase or decrease the margin; and c) the observed impact on other receipt points.¹⁴ The referenced over-nomination event information is provided below.

¹⁴ See Resolution G-3486, Ordering Paragraph No. 2.

a. Frequency

This analysis is included as Attachment F to this AL. In the reporting period, there were a total of 24 days where a Southern System reliability purchase coincided with an operational flow order (OFO).¹⁵

b. and c. Margin of Error and Impact on Other Receipt Points

In the reporting period, there were a total of 24 days where a Southern System reliability purchase coincided with an operational flow order (OFO). On 15 of these days, scheduled volumes at the Southern System on the cycle when the OFO was declared were much higher (between 68,000 dth and 407,000 dth) than 110% of the posted minimum. The percentage reductions that occurred on the Southern System in response to the OFOs were similar to those at other receipt points. Thus, on these days the 10% 'margin of error' was not binding and did not affect scheduled deliveries at other receipt points during the OFO day.

On two occasions, June 22 and July 24, 2016, scheduled volumes in the Southern System were lower than 100% of the minimum after the OFO was declared and remained below the minimum throughout the day. Since supplies could not even meet 100% of the minimum on these days, the 10% margin of error was not binding and had no effect on the Southern System or other receipt points.

There were 7 days in which the 10% margin of error affected supplies at other receipt points:

On Feb 19 and 20, 2016, scheduled volumes in the Southern System were held slightly above 110% of the minimum after a cycle 1 OFO was declared. Supplies at other receipt points declined by 116,000 dth, or 6%. Had the minimum been 100%, rather than 110%, the supplies at other receipt points would have been reduced by only 59,000 dth, or 3%. On these days, the impact on other receipts points was 57,000 dth.

On August 6, 2016, a cycle 1 OFO was declared when scheduled volumes in the Southern System were below 110% of the minimum flow requirement. Southern System supplies on that day increased to the 110% minimum level on cycle 2. Supplies at other receipt points, however, declined by 397,000 dth, or 20%. Had the minimum been 100%, rather than 110%, the supplies at other receipt points would have been reduced by only 339,000 dth, or 17%. On this day, the impact on other receipts points was 58,000 dth.

¹⁵ This is out of a total of 88 high OFO days.

On Aug 9 and 10, 2016, scheduled volumes in the Southern System were held to 110% of the minimum after a cycle 2 OFO was declared. Supplies at other receipt points increased by 12,000 dth, or less than 1%. Had the minimum been 100%, rather than 110%, the supplies at other receipt points would have increased by 72,000 dth, or 4%. On these days, the impact on other receipts points was 60,000 dth.

On August 20 and 21, 2016, scheduled volumes in the Southern System were held to 110% of the minimum after a cycle 3 OFO was declared. Supplies at other receipt points declined by 138,000 dth, or 7%. Had the minimum been 100%, rather than 110%, the supplies at other receipt points would have been reduced by only 76,000 dth, or 4%. On these days, the impact on other receipts points was 62,000 dth.

In summary, there were 7 days where the 110% minimum affected other receipts points; on average, supplies at those points were reduced by 59,000 dth more than had there been no 10% margin of error. This impact of the Rule No. 30 revision seems negligible, and even if that were not the case, SoCalGas believes that a 110% margin is necessary.

Conclusion

For the reasons set forth above, SoCalGas respectfully requests that the Commission approve the ACR and determine that all of the transactions entered into the SRMA balance for September 1, 2015, through August 31, 2016, are reasonable and subject to amortization in customer transportation rates during 2017.

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 23, 2016. 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 - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

Effective Date

The Settlement Agreement in A.08-02-001, which was approved by Decision 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 15, 2016.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A. 15-07-014, the most recent SoCalGas/SDG&E TCAP. 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 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) #: 5040

Subject of AL: 2016 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (September 1, 2015 through August 31, 2016)

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 and Resolution G-3480

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: See Declaration of Confidentiality

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 12/15/16

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: N/A

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. 5040

SUMMARY OF PURCHASES/SALES

**Southern System Minimum Flow Purchases
September 2015 thru August 2016**

**Southern System Minimum Flow Purchases
Summary Sept 2015 thru August 2016**

Month	Purchases				Sales		Sub-Total Net Cost \$	Transport \$ Amt.	Total Net Cost \$
	Quantity (Dths)	In-Kind (Dths)	Net (Dths)	\$ Amt.	Quantity (Dths)	\$ Amt.			
Sep-15	133,897	195	133,702	\$462,733	133,702	(\$402,393)	\$60,340	\$23,778	\$84,118
Oct-15	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Nov-15	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Dec-15	7,907,889	14,618	7,893,271	\$19,976,384	7,842,380	(\$20,308,156)	(\$331,772)	\$1,434,174	\$1,102,402
Jan-16	7,840,661	25,460	7,815,201	\$20,777,752	7,866,001	(\$21,644,301)	(\$866,549)	\$1,274,453	\$407,904
Feb-16	7,470,579	24,258	7,446,321	\$17,261,077	7,446,412	(\$18,098,105)	(\$837,028)	\$1,206,433	\$369,405
Mar-16	7,885,671	25,610	7,860,061	\$13,326,784	7,860,061	(\$14,004,768)	(\$677,984)	\$1,275,906	\$597,922
Apr-16	36,000	80	35,920	\$72,000	35,920	(\$74,814)	(\$2,814)	\$5,819	\$3,006
May-16	72,000	161	71,839	\$144,000	71,839	(\$143,678)	\$322	\$11,639	\$11,961
Jun-16	29,000	454	28,546	\$88,450	28,546	(\$84,211)	\$4,239	\$20,584	\$24,823
Jul-16	1,596,664	1,388	1,595,276	\$5,977,554	1,597,286	(\$4,797,953)	\$1,179,601	\$203,415	\$1,383,016
Aug-16	6,283,891	5,438	6,278,453	\$17,632,441	6,276,443	(\$17,469,116)	\$163,325	\$980,221	\$1,143,546
Total =>	39,256,252	97,662	39,158,590	\$95,719,175	39,158,590	(\$97,027,495)	(\$1,308,320)	\$6,436,422	\$5,128,103

ATTACHMENT B

Advice No. 5040

TRANSACTIONS, PUBLIC

Southern System Minimum Flow Purchase/Sale

SPOT PURCHASES:

Notification Minimum Flow				PURCHASE								SALE					Net \$ \$Purchase minus \$Sale			
Date Notified	Flow Date	Cycle	Amt. Requested (Dths)	TC#	Amt. Flowed (Dths)	BTS inkind	Net Amt. Flowed (Dths)	Purchase Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	BTS Charge (\$)	Flow Date	TC#	Amt. (Dths)	Sale Price \$/Dth	Rule 41 Limit \$/Dth		\$ Amt.		
9/8/15	9/8/15	4	91,000	2783	24,000	35	23,965	\$3.5000	Sec. 16	\$84,000.00	\$4,262	9/10/15	2788	5,000	\$3.0150	Sec. 15(b)	\$15,075.00			
				2784	17,500	26	17,474	\$3.6000	Sec. 16	\$63,000.00	\$3,108	9/10/15	2789	20,000	\$3.0150	Sec. 15(b)	\$60,300.00			
				2785	4,500	7	4,493	\$3.7000	Sec. 16	\$16,650.00	\$799	9/10/15	2790	10,000	\$3.0150	Sec. 15(b)	\$30,150.00			
				2786	10,315	14	10,301	\$3.8500	Sec. 16	\$39,712.75	\$1,832	9/10/15	2791	20,000	\$3.0150	Sec. 15(b)	\$60,300.00			
				2787	29,582	43	29,539	\$3.9000	Sec. 16	\$115,369.80	\$5,253	9/10/15	2792	20,000	\$3.0150	Sec. 15(b)	\$60,300.00			
												9/10/15	2797	10,772	\$3.0150	Sec. 15(b)	\$32,477.58			
9/9/15	9/10/15	3	48,000	2798	48,000	70	47,930	\$3.0000	Sec. 15(b)	\$144,000.00	\$8,524	9/10/15	2799	47,930	\$3.0000	Sec. 15(b)	\$143,790.00			
12/27/15	12/28/15	3	142,754	2832	84,476	156	84,320	\$3.4400	Sec 16	\$290,597.44	\$14,995	12/29/15	2836	70,000	\$2.8550	Sec 15 (b)	\$199,850.00			
				2833	9,761	18	9,743	\$3.4000	Sec 16	\$33,187.40	\$1,733	12/29/15	2842	5,000	\$3.2200	Sec 15 (b)	\$16,100.00			
				2834	4,912	9	4,903	\$3.5000	Sec 16	\$17,192.00	\$872	12/29/15	2846	24,000	\$3.1000	Sec 15 (b)	\$74,400.00			
				2835	19,985	37	19,948	\$3.7500	Sec 16	\$74,943.75	\$3,548	12/30/15	2840	20,000	\$3.0250	Sec 15 (b)	\$60,500.00			
12/28/15	12/28/15	4	96,000	2837	10,000	19	9,981	\$4.0000	Sec 16	\$40,000.00	\$1,775	12/30/15	2843	20,000	\$3.0300	Sec 15 (b)	\$60,600.00			
				2838	25,000	46	24,954	\$4.7000	Sec 16	\$117,500.00	\$4,438	12/30/15	2844	10,000	\$3.0300	Sec 15 (b)	\$30,300.00			
				2839	8,059	15	8,044	\$4.7500	Sec 16	\$38,280.25	\$1,431	12/30/15	2848	4,200	\$3.0150	Sec 15 (b)	\$12,663.00			
													12/31/15	2850	10,000	\$2.7500	Sec 15 (b)	\$27,500.00		
12/28/15	12/29/15	3	55,000	2845	24,000	44	23,956	\$3.8500	Sec 16	\$92,400.00	\$4,260	12/31/15	2851	2,700	\$2.7500	Sec. 15(b)	\$7,425.00			
				2847	31,000	58	30,942	\$3.9500	Sec 16	\$122,450.00	\$5,503									
				Not Purchased	20,000			\$4.0000	Sec 16											
												1/1-4/2016	2852	48,000	\$2.7300	Sec 15 (b)	\$131,040.00			
												1/1-4/2016	2853	2,800	\$2.7500	Sec 15 (b)	\$7,700.00			
2/1/16	2/2/16	2	40,000	2859	40,000	130	39,870	\$2.3000	Sec 15(a)	\$92,000.00	\$6,459	2/2/16	2860	39,870	\$2.3000	Sec 15(a)	\$91,701.00			
2/1/16	2/2/16	3	41,000	2861	21,000	68	20,932	\$2.4000	Sec 15(a)	\$50,400.00	\$3,391	2/2/16	2862	20,932	\$2.2800	Sec 15(a)	\$47,724.96			
2/2/16	2/3/16	3	15,000	2864	15,000	49	14,951	\$2.4800	Sec 16	\$37,200.00	\$2,422	2/3/16	2865	10,000	\$2.4000	Sec 15(b)	\$24,000.00			
														2/10/16	2867	5,042	\$2.2200	Sec 15(b)	\$11,193.24	
				Not Purchased	15,000			\$2.5000	Sec 16											
				Not Purchased	15,000			\$2.5500	Sec 16											
4/24/16	4/25/16	3	36,000	2879	36,000	80	35,920	\$2.0000	Sec. 16	\$72,000.00	\$5,819	4/25/16	2880	30,000	\$2.0800	Sec. 15(b)	\$62,400.00			
														4/27/16	2881	5,000	\$2.1000	Sec. 15(b)	\$10,500.00	
															4/27/16	2882	920	\$2.0800	Sec. 15(b)	\$1,913.60
				Not Purchased	36,000			\$2.0800	Sec 16											
				Not Purchased	15,000			\$2.1800	Sec 16											
5/1/16	5/2/16	3	72,000	2884	72,000	161	71,839	\$2.0000	Sec 15(b)	\$144,000.00	\$11,639	5/2/16	2885	71,839	\$2.0000	Sec 15(b)	\$143,678.00			
6/21/16	6/21/16	5	14,500	2897	14,500	227	14,273	\$3.1000	Sec 17(2)	\$44,950.00	\$10,292	6/21/16	2898	14,273	\$3.0000	Sec 15(b)	\$42,819.00			
	6/22/16	2	14,500	2899	14,500	227	14,273	\$3.0000	Sec 17(2)	\$43,500.00	\$10,292	6/22/16	2900	14,273	\$2.9000	Sec 15(a)	\$41,391.70			
7/7/16	7/7/16	3	30,000	2904	30,000	26	29,974	\$2.6500	Sec 15(b)	\$79,500.00	\$4,856	7/7/16	2905	29,974	\$2.5150	Sec 15(b)	\$75,384.61			
7/20/16	7/20/16	3	79,000	2916	30,000	26	29,974	\$2.9900	Sec 15(b)	\$89,700.00	\$4,856	7/20/16	2921	10,000	\$3.0900	Sec. 15(b)	\$30,900.00			
				2917	10,000	9	9,991	\$3.2500	Sec 16	\$32,500.00	\$1,619	7/20/16	2927	5,000	\$3.1000	Sec. 15(b)	\$15,500.00			
				2918	14,112	12	14,100	\$3.4500	Sec 16	\$48,686.40	\$2,284	7/20/16	2928	10,000	\$3.1100	Sec. 15(b)	\$31,100.00			
				2919	10,000	9	9,991	\$3.5000	Sec 16	\$35,000.00	\$1,619	7/20/16	2929	20,000	\$3.0700	Sec. 15(b)	\$61,400.00			
				2920	14,000	12	13,988	\$3.6500	Sec 16	\$51,100.00	\$2,266	7/20/16	2930	10,000	\$3.0500	Sec. 15(b)	\$30,500.00			

Date Notified	Flow Date	Cycle	Amt. Requested (Dths)	TC#	Amt. Flowed (Dths)	BTS inkind	Net Amt. Flowed (Dths)	Purchase Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	BTS Charge (\$)	Flow Date	TC#	Amt. (Dths)	Sale Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	Net \$ Purchase minus \$Sale
												7/20/16	2951	60	\$2,9000	Sec. 15(b)	\$174.00	
												7/21/16	2933	10,000	\$3,0000	Sec. 15(b)	\$30,000.00	
												7/21/16	2934	10,000	\$3,0000	Sec. 15(b)	\$30,000.00	
												7/21/16	2935	3,000	\$3,0000	Sec. 15(b)	\$9,000.00	
7/20/16	7/21/16	3	60,000	2932	29,614	26	29,588	\$3.5000	Sec 16	\$103,649.00	\$4,794	7/22/16	2936	60,000	\$3.0700	Sec 15(b)	\$184,200.00	
				2931	9,992	8	9,984	\$3.3500	Sec 16	\$33,473.20	\$1,618							
			Not Purchased		60,000			\$3.5500	Sec 16									
7/21/16	7/21/16	5	48,000	Supplier unable to provide due to late intraday (cycle 5) request.														
7/21/16	7/22/16	3	228,144	2937	35,000	30	34,970	\$3.6500	Sec 16	\$127,750.00	\$3,147	7/22/16	2939	37,967	\$3.0000	Sec. 15(b)	\$113,901.00	
				2938	38,000	33	37,967	\$3.8000	Sec 16	\$144,400.00	\$3,417	7/22/16	2941	99,913	\$3.0000	Sec. 15(b)	\$299,739.00	
				2940	100,000	87	99,913	\$3.9500	Sec 16	\$395,000.00	\$8,992	7/22/16	2944	40,109	\$3.0000	Sec. 15(b)	\$120,327.00	
				2942	15,000	13	14,987	\$4.0000	Sec 16	\$60,000.00	\$1,349	7/22/16	2945	10,000	\$3.5000	Sec. 15(b)	\$35,000.00	
				2943	40,144	35	40,109	\$3.9000	Sec 16	\$156,561.60	\$3,610	7/23-7/25	2946	6,000	\$3.8000	Sec. 15(b)	\$22,800.00	
												7/22/16	2949	10,179	\$3.8000	Sec. 15(b)	\$38,680.20	
7/22/16	7/23/16	2	162,971	2952	27,687	24	27,663	\$3.8500	Sec 15(a)	\$106,594.95	\$2,490	7/23/16	2956	79,930	\$3.4800	Sec 15(a)	\$278,156.40	
				2955	80,000	70	79,930	\$4.3300	Sec 16	\$346,400.00	\$7,194	7/23/16	2958	22,951	\$3.5000	Sec 15(a)	\$80,328.50	
				2957	22,971	20	22,951	\$4.3400	Sec 16	\$99,694.14	\$2,066	7/27/16	2984	60,000	\$3.1650	Sec 15(b)	\$189,900.00	
			Not Purchased		15,000			\$4.3500	Sec 16									
				2959	9,337	8	9,329	\$3.8000	Sec 15(a)	\$35,480.60	\$840	7/27/16	2987	33,300	\$3.1650	Sec 15(b)	\$105,394.50	
7/22/16	7/24/16	1	33,000	2953	33,000	29	32,971	\$3.8500	Sec 15(a)	\$127,050.00	\$2,967	7/26/16	2988	4,910	\$3.3500	Sec 15(b)	\$16,448.50	
7/22/16	7/25/16	1	53,000	2954	28,123	24	28,099	\$4.0000	Sec 16	\$112,492.00	\$2,529							
			Not Purchased		80,000			\$4.2500	Sec 16									
			Not Purchased		45,000			\$4.3400	Sec 16									
7/24/16	7/25/16	3	200,000	2960	20,000	17	19,983	\$3.5000	Sec 15(b)	\$70,000.00	\$1,798	7/25/16	2963	34,084	\$3.1500	Sec. 15(b)	\$107,364.60	
				2961	27,684	24	27,660	\$3.5000	Sec 15(b)	\$96,894.00	\$2,489	7/25/16	2965	47,844	\$3.1500	Sec. 15(b)	\$150,708.60	
				2962	34,114	30	34,084	\$3.9500	Sec 15(b)	\$134,750.30	\$3,068	7/26/16	2985	89,131	\$3.2500	Sec. 15(b)	\$289,675.75	
				2964	47,886	42	47,844	\$4.0000	Sec 15(b)	\$191,544.00	\$4,306	7/27/16	2986	6,700	\$3.1650	Sec. 15(b)	\$21,205.50	
7/25/16	7/25/16	5	51,000	2975	51,000	45	50,955	\$3.9000	Sec 15(b)	\$198,900.00	\$4,586	7/28/16	3015	5,924	\$3.5500	Sec. 15(b)	\$21,030.20	
7/25/16	7/26/16	3	155,000	2976	38,000	33	37,967	\$3.5900	Sec 16	\$136,420.00	\$3,417	7/26/16	2977	37,967	\$2.7500	Sec. 15(b)	\$104,409.25	
				2978	37,985	33	37,952	\$3.5500	Sec 16	\$134,846.75	\$3,416	7/26/16	2979	37,952	\$2.7500	Sec. 15(b)	\$104,368.00	
				2980	44,015	38	43,977	\$3.6800	Sec 16	\$161,975.20	\$3,958	7/26/16	2981	43,976	\$2.7500	Sec. 15(b)	\$120,934.00	
				2982	35,000	30	34,970	\$3.4500	Sec 16	\$120,750.00	\$3,147	7/26/16	2983	35,000	\$2.7500	Sec. 15(b)	\$96,250.00	
7/26/16	7/27/16	3	169,000	2996	38,000	33	37,967	\$3.7500	Sec 16	\$142,500.00	\$6,151	7/27/16	2997	37,967	\$2.8500	Sec. 15(b)	\$108,205.95	
				2998	43,360	38	43,322	\$3.7500	Sec 16	\$162,600.00	\$7,019	7/27/16	2999	43,322	\$2.8500	Sec. 15(b)	\$123,467.70	
				3000	70,000	61	69,939	\$3.7500	Sec 16	\$262,500.00	\$11,331	7/27/16	3001	69,939	\$2.8500	Sec. 15(b)	\$199,326.15	
				3002	17,640	15	17,625	\$4.0000	Sec 16	\$70,560.00	\$2,855	7/27/16	3003	17,625	\$2.8500	Sec. 15(b)	\$50,231.25	
7/27/16	7/28/16	3	268,000	3007	38,000	33	37,967	\$3.9200	Sec 15(b)	\$148,960.00	\$6,151	7/28/16	3008	37,967	\$3.0200	Sec. 15(b)	\$114,660.34	
				3009	42,800	37	42,763	\$3.9200	Sec 15(b)	\$167,776.00	\$6,928	7/28/16	3010	42,763	\$3.0200	Sec. 15(b)	\$129,144.26	
				3011	87,200	76	87,124	\$3.9300	Sec 15(b)	\$342,696.00	\$14,115	7/28/16	3012	87,124	\$3.0200	Sec. 15(b)	\$263,114.48	
				3013	100,000	87	99,913	\$3.6700	Sec 15(b)	\$367,000.00	\$16,187	7/28/16	3014	99,913	\$3.0200	Sec. 15(b)	\$301,737.26	
7/28/16	7/29/16	3	250,000	3017	15,000	13	14,987	\$3.1200	Sec 15(b)	\$46,800.00	\$2,428	7/29/16	3019	74,935	\$2.7500	Sec. 15(b)	\$206,071.25	
				3018	75,000	65	74,935	\$3.5000	Sec 15(b)	\$262,500.00	\$12,140	7/29/16	3021	52,954	\$2.7500	Sec. 15(b)	\$145,623.50	
				3020	50,000	44	49,956	\$3.6400	Sec 16	\$182,000.00	\$8,093	7/29/16	3023	79,929	\$2.7500	Sec. 15(b)	\$219,804.75	
				3022	80,000	70	79,930	\$3.6500	Sec 16	\$292,000.00	\$12,949	7/29/16	3025	26,977	\$2.7500	Sec. 15(b)	\$74,186.75	
				3024	27,000	23	26,977	\$3.6500	Sec 16	\$98,550.00	\$4,371	7/29/16	3026	14,000	\$3.4000	Sec 15(b)	\$47,600.00	
8/2/16	8/3/16	3	24,000	3033	24,000	21	23,979	\$3.0000	Sec 15(b)	\$72,000.00	\$3,727	8/3/16	3034	23,979	\$2.6000	Sec 15(b)	\$62,345.40	

Date Notified	Flow Date	Cycle	Amt. Requested (Dths)	TC#	Amt. Flowed (Dths)	BTS inkind	Net Amt. Flowed (Dths)	Purchase Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	BTS Charge (\$)	Flow Date	TC#	Amt. (Dths)	Sale Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	Net \$ Purchase minus \$Sale
8/14/16	8/15/16	3	41,000	3072	40,764	35	40,729	\$3.2500	Sec 15(b)	\$132,483.00	\$6,361	8/15/16	3073	40,729	\$3.0000	Sec 15(b)	\$122,187.00	
8/18/16	8/19/16	3	39,000	3101	20,000	17	19,983	\$2.9200	Sec 15(b)	\$58,400.00	\$3,106	8/19/16	3103	17,500	\$2.9000	Sec 15(b)	\$50,750.00	
				3102	19,000	17	18,983	\$3.0000	Sec 15(b)	\$57,000.00	\$2,950	8/19/16	3104	19,800	\$2.9500	Sec 15(b)	\$58,410.00	
												8/19/16	3105	2,500	\$2.9800	Sec 15(b)	\$7,450.00	
8/21/16	8/22/16	3	14,000	3111	14,000	12	13,988	\$2.8000	Sec 15(b)	\$39,200.00	\$2,174	8/22/16	3112	13,988	\$2.6000	Sec 15(b)	\$36,368.80	

July 2016 Spot as % of Total Spot Purchases =====> 70% 1,595,276

Total Spot Purchases	2,570,869	2,278,518	3,029	2,275,489	8,109,971	334,379	2,278,333	6,643,257	\$1,801,092.59	\$ 0.79
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BASELOAD PURCHASES:

				PURCHASE								SALE				Net \$ Purchase minus \$Sale		
Monthly Contract	Flow Date	Cycle	Amt. Nominated (Dths)	TC#	Amt. Flowed (Dths)	BTS inkind	Net Amt. Flowed (Dths)	Purchase Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	BTS Charge (\$)	Flow Date	TC#	Amt. (Dths)	Sale Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	
December 2015	Daily		7,905,000	2667	1,505,722	2,776	1,502,946	\$2.4900	Sec 20	\$3,749,247.78	\$273,572.54	Daily	2668	1,502,946	\$2.5850	Sec 20	\$3,885,115.41	
	Daily			2669	1,199,268	2,220	1,197,048	\$2.4900	Sec 20	\$2,986,177.32	\$218,667.43	Daily	2670	1,197,048	\$2.5850	Sec 20	\$3,094,369.08	
	Daily			2679	3,778,257	6,985	3,771,272	\$2.4900	Sec 20	\$9,407,859.93	\$684,421.60	Daily	2680	3,771,272	\$2.5800	Sec 20	\$9,729,881.76	
	Daily			2681	1,207,449	2,235	1,205,214	\$2.4900	Sec 20	\$3,006,548.01	\$218,957.89	Daily	2682	1,205,214	\$2.5800	Sec 20	\$3,109,452.12	
January 2016	Daily		7,905,000	2667	1,539,234	4,988	1,534,246	\$2.6500	Sec 20	\$4,078,970.10	\$249,954.17	Daily	2668	1,534,246	\$2.7550	Sec 20	\$4,226,847.73	
	Daily			2669	1,221,455	3,970	1,217,485	\$2.6500	Sec 20	\$3,236,855.75	\$199,640.59	Daily	2670	1,217,485	\$2.7550	Sec 20	\$3,354,171.18	
	Daily			2679	3,848,462	12,500	3,835,962	\$2.6500	Sec 20	\$10,198,424.30	\$624,892.65	Daily	2680	3,835,962	\$2.7500	Sec 20	\$10,548,895.50	
	Daily			2681	1,231,510	4,002	1,227,508	\$2.6500	Sec 20	\$3,263,501.50	\$199,965.33	Daily	2682	1,227,508	\$2.7500	Sec 20	\$3,375,647.00	
February 2016	Daily		7,395,000	2667	1,449,581	4,697	1,444,884	\$2.3100	Sec 20	\$3,348,532.11	\$234,139.83	Daily	2668	1,444,884	\$2.4350	Sec 20	\$3,518,292.54	
	Daily			2669	1,160,000	3,770	1,156,230	\$2.3100	Sec 20	\$2,679,600.00	\$187,320.82	Daily	2670	1,156,230	\$2.4350	Sec 20	\$2,815,420.05	
	Daily			2679	3,624,999	11,774	3,613,225	\$2.3100	Sec 20	\$8,373,747.69	\$585,378.71	Daily	2680	3,613,225	\$2.4300	Sec 20	\$8,780,136.75	
	Daily			2681	1,159,999	3,770	1,156,229	\$2.3100	Sec 20	\$2,679,597.69	\$187,320.79	Daily	2682	1,156,229	\$2.4300	Sec 20	\$2,809,636.47	
March 2016	Daily		7,905,000	2667	1,542,700	5,000	1,537,700	\$1.6900	Sec 20	\$2,607,163.00	\$250,066.08	Daily	2668	1,537,700	\$1.7850	Sec 20	\$2,744,794.50	
	Daily			2669	1,238,281	4,025	1,234,256	\$1.6900	Sec 20	\$2,092,694.89	\$200,183.97	Daily	2670	1,234,256	\$1.7850	Sec 20	\$2,203,146.96	
	Daily			2679	3,866,410	12,560	3,853,850	\$1.6900	Sec 20	\$6,534,232.90	\$625,472.22	Daily	2680	3,853,850	\$1.7800	Sec 20	\$6,859,853.00	
	Daily			2681	1,238,280	4,025	1,234,255	\$1.6900	Sec 20	\$2,092,693.20	\$200,183.93	Daily	2682	1,234,255	\$1.7800	Sec 20	\$2,196,973.90	
August 2016	Daily		6,200,000	2966	570,400	496	569,904	\$2.7850	Sec 29	\$1,588,564.00	\$88,494.69	Daily	2974	619,999	\$2.7750	Sec 29	\$1,720,497.23	
	Daily			2967	620,000	527	619,473	\$2.7950	Sec 29	\$1,732,900.00	\$96,191.77	Daily	2989	620,000	\$2.7650	Sec 29	\$1,714,300.00	
	Daily			2968	620,000	527	619,473	\$2.8000	Sec 29	\$1,736,000.00	\$96,191.77	Daily	2990	309,999	\$2.7650	Sec 29	\$857,147.24	
	Daily			2969	588,609	501	588,108	\$2.8000	Sec 29	\$1,648,105.20	\$96,191.77	Daily	2991	465,000	\$2.7650	Sec 29	\$1,285,725.00	
	Daily			2970	620,000	558	619,442	\$2.8050	Sec 29	\$1,739,100.00	\$96,186.95	Daily	2992	588,108	\$2.7700	Sec 29	\$1,629,059.16	
	Daily			2972	1,547,518	1,332	1,546,186	\$2.8050	Sec 29	\$4,340,787.99	\$240,477.01	Daily	2993	1,391,545	\$2.7717	Sec 29	\$3,856,899.08	
	Daily			2973	775,000	682	774,318	\$2.8050	Sec 29	\$2,173,875.00	\$120,236.10	Daily	2994	1,240,000	\$2.7700	Sec 29	\$3,434,800.00	
	Daily			2995	310,000	279	309,721	\$2.8000	Sec 29	\$868,000.00	\$48,093.48	Daily	3006	514,166	\$2.7650	Sec 29	\$1,421,668.99	
	Daily			3005	514,600	434	514,166	\$2.8100	Sec 29	\$1,446,026.00	\$79,839.70							
Spot deals to sell remaining balance of baseload purchases:												8/3/16	3032	11,094	\$2.8300	Sec 29	\$31,396.02	
												8/3/16	3035	13,000	\$2.9000	Sec 29	\$37,700.00	
												8/3/16	3037	297	\$2.9000	Sec 29	\$861.30	
												8/5/16	3040	13,297	\$2.8600	Sec 29	\$38,029.42	
												8/5/16	3046	10,000	\$2.8200	Sec 29	\$28,200.00	
												8/5/16	3047	3,200	\$2.8200	Sec 29	\$9,024.00	
												8/5/16	3048	97	\$2.8200	Sec 29	\$273.54	

Date Notified	Flow Date	Cycle	Amt. Requested (Dths)	TC#	Amt. Flowed (Dths)	BTS inkind	Net Amt. Flowed (Dths)	Purchase Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	BTS Charge (\$)	Flow Date	TC#	Amt. (Dths)	Sale Price \$/Dth	Rule 41 Limit \$/Dth	\$ Amt.	Net \$ Purchase minus \$Sale
												8/8/16	3050	39,891	\$2.9500	Sec 29	\$117,678.45	
												8/10/16	3052	13,297	\$2.7100	Sec 29	\$36,034.87	
												8/11/16	3057	13,300	\$2.7300	Sec 29	\$36,309.00	
												8/12/16	3061	13,300	\$2.7000	Sec 29	\$35,910.00	
												8/13-15/2016	3068	13,299	\$3.0050	Sec 29	\$39,963.50	
												8/16/16	3074	8,000	\$3.5200	Sec 29	\$28,160.00	
												8/16/16	3075	5,000	\$3.5225	Sec 29	\$17,612.50	
												8/16/16	3076	26,900	\$3.5225	Sec 29	\$94,755.25	
												8/17/16	3084	10,000	\$3.1500	Sec 29	\$31,500.00	
												8/17/16	3085	3,300	\$3.1400	Sec 29	\$10,362.00	
												8/18/16	3090	13,200	\$3.0900	Sec 29	\$40,788.00	
												8/19/16	3093	13,200	\$2.7725	Sec 29	\$36,597.00	
												8/20-22/2016	3097	13,200	\$2.6150	Sec 29	\$34,518.00	
												8/23/16	3110	39,800	\$2.9150	Sec 29	\$116,017.00	
												8/24/16	3116	13,200	\$2.7600	Sec 29	\$36,432.00	
												8/25/16	3118	13,000	\$2.7795	Sec 29	\$36,133.50	
												8/26/16	3125	13,200	\$2.7972	Sec 29	\$36,923.04	
												8/27-29/2016	3129	13,200	\$2.6900	Sec 29	\$35,508.00	
												8/30/16	3134	20,000	\$3.0900	Sec 29	\$61,800.00	
												8/30/16	3135	18,900	\$3.0900	Sec 29	\$58,401.00	
												8/31/16	3140	13,200	\$3.0800	Sec 29	\$40,656.00	
												8/31/16	3143	5,400	\$3.0500	Sec 29	\$16,470.00	
												8/31/16	3144	5,000	\$3.0150	Sec 29	\$15,075.00	
												8/31/16	3145	10,000	\$3.0200	Sec 29	\$30,200.00	
												8/31/16	3146	7,300	\$3.0200	Sec 29	\$22,046.00	
												8/31/16	3147	58	\$3.0000	Sec 29	\$174.00	

Total Baseload Purchases	37,310,000	36,977,734	94,633	36,883,101		87,609,204	6,102,042		36,880,257	90,384,239	\$3,327,007
Grand Total (Spot and Baseload)	39,880,869	39,256,252	97,662	39,158,590		\$95,719,175	\$6,436,420		39,158,590	\$97,027,496	\$5,128,100
Unit price (Net)											\$0.131

Table 1
Southern System Purchases, September 2015 - August 2016

	# Transactions	%	\$	%
Section 15	25	30%	\$3,255,629	3%
Section 16	44	52%	\$4,765,892	5%
Section 17	2	2%	\$88,450	0.1%
Section 20	4	5%	\$70,335,846	73%
Section 29	9	11%	\$17,273,358	18%
Total	84	100%	\$95,719,175	100%

ATTACHMENT C

Advice No. 5040

ICE PRICES

<u>Date</u>	PURCHASE (SoCal - Ehrenberg)			SALE (SoCal - Citygate)		
	Rule 41, Sec 15 a/b	<u>ICE \$/dth</u>	<u>110%</u>	Rule 41, Sec 15 a/b	<u>ICE \$/dth</u>	<u>90%</u>
9/8/2015	Sec 13 (a) Wtd Avg	\$2.5382	\$2.7920	Sec 13 (a) Wtd Avg	\$2.6833	\$2.4150
	Sec 13 (b) High	\$2.6200	\$2.8820	Sec 13 (b) Low	\$2.6500	\$2.3850
9/10/2015	Sec 13 (a) Wtd Avg	\$2.8511	\$3.1362	Sec 13 (a) Wtd Avg	\$3.0185	\$2.7167
	Sec 13 (b) High	\$2.8800	\$3.1680	Sec 13 (b) Low	\$2.9800	\$2.6820
12/28/2016	Sec 15 (a) Wtd Avg	\$2.1113	\$2.3224	Sec 15 (a) Wtd Avg	\$2.5761	\$2.3185
	Sec 15 (b) High	\$2.1500	\$2.3650	Sec 15 (b) Low	\$2.5600	\$2.3040
12/29/2016	Sec 15 (a) Wtd Avg	\$2.9479	\$3.2427	Sec 15 (a) Wtd Avg	\$2.8458	\$2.5612
	Sec 15 (b) High	\$3.0500	\$3.3550	Sec 15 (b) Low	\$2.7800	\$2.5020
2/2/2016	Sec 15 (a) Wtd Avg	\$2.2562	\$2.4818	Sec 15 (a) Wtd Avg	\$2.3931	\$2.1538
	Sec 15 (b) High	\$2.7000	\$2.9700	Sec 15 (b) Low	\$2.3700	\$2.1330
2/3/2016	Sec 15 (a) Wtd Avg	\$2.1006	\$2.3107	Sec 15 (a) Wtd Avg	\$2.2493	\$2.0244
	Sec 15 (b) High	\$2.1100	\$2.3210	Sec 15 (b) Low	\$2.2400	\$2.0160
4/25/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$1.7750	\$1.9525	Sec 15 (b) Low	\$1.7500	\$1.5750
5/2/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$1.8300	\$2.0130	Sec 15 (b) Low	\$1.8825	\$1.6943
6/21/2016	Sec 15 (a) Wtd Avg	\$2.9972	\$3.2969	Sec 15 (a) Wtd Avg	\$3.1347	\$2.8212
	Sec 15 (b) High	\$3.0300	\$3.3330	Sec 15 (b) Low	\$3.0700	\$2.7630

6/22/2016	Sec 15 (a) Wtd Avg	\$2.9437	\$3.2381	Sec 15 (a) Wtd Avg	\$3.0656	\$2.7590
	Sec 15 (b) High	\$2.9800	\$3.2780	Sec 15 (b) Low	\$3.0400	\$2.7360
7/7/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.4500	\$2.6950	Sec 15 (b) Low	\$2.4500	\$2.2050
7/20/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8500	\$3.1350	Sec 15 (b) Low	\$2.9000	\$2.6100
7/21/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9000	\$3.1900	Sec 15 (b) Low	\$2.9700	\$2.6730
7/22/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.0100	\$3.3110	Sec 15 (b) Low	\$2.9900	\$2.6910
7/23 -25/2016	Sec 15 (a) Wtd Avg	\$3.5178	\$3.8696	Sec 15 (a) Wtd Avg	\$3.6466	\$3.2819
	Sec 15 (b) High	\$3.6400	\$4.0040	Sec 15 (b) Low	\$3.4950	\$3.1455
7/26/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.0000	\$3.3000	Sec 15 (b) Low	\$3.0000	\$2.7000
7/27/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.0900	\$3.3990	Sec 15 (b) Low	\$3.1600	\$2.8440
7/28/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.6000	\$3.9600	Sec 15 (b) Low	\$3.3500	\$3.0150
7/29/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.1850	\$3.5035	Sec 15 (b) Low	\$3.0500	\$2.7450
8/3/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8600	\$3.1460	Sec 15 (b) Low	\$2.7500	\$2.4750

8/15/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.0300	\$3.3330	Sec 15 (b) Low	\$3.0000	\$2.7000
8/19/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.7500	\$3.0250	Sec 15 (b) Low	\$2.7500	\$2.4750
8/22/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.5775	\$2.8353	Sec 15 (b) Low	\$2.6000	\$2.3400

Sec 15 (a) applies to purchases/sales made in the day-ahead market

Sec 15 (b) applies to purchases/sales made in the same-day market

ATTACHMENT D

Advice No. 5040

**REQUESTS TO THE OPERATIONAL HUB FOR ADDITIONAL
SUPPLIES TO MEET SOUTHERN SYSTEM
MINIMUM FLOW REQUIREMENTS**



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 91,000 Dth

Flow Date(s) Requested: September 8, 2015

Time of Request: 9:15:00 am September 8, 2015

Reason for Request: Southern System scheduled quantities 91,000 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 48,000 Dth

Flow Date(s) Requested: September 10, 2015

Time of Request: 8:30 pm September 9, 2015

Reason for Request: Southern System scheduled quantities are 48,000 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 142,754 Dth

Flow Date(s) Requested: December 28, 2015

Time of Request: 8:22:00 pm December 27, 2015

Reason for Request: Southern System scheduled quantities 142,754 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 96,000 Dth

Flow Date(s) Requested: December 28, 2015

Time of Request: 2:00 pm December 28, 2015

Reason for Request: Southern System scheduled quantities 96,000 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 55,000 Dth

Flow Date(s) Requested: December 29, 2015

Time of Request: 8:47 pm December 28, 2015

Reason for Request: Southern System scheduled quantities 55,000 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 40,000 Dth

Flow Date(s) Requested: February 2, 2016

Time of Request: 10:26:00 am February 1, 2016

Reason for Request: Southern System scheduled quantities 38,427 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 41,000 Dth

Flow Date(s) Requested: February 2, 2016

Time of Request: 8:08:00 pm February 1, 2016

Reason for Request: Southern System scheduled quantities 41,272 Dth below the southern system minimum flowing supply requirement.



A  Sempra Energy utility®

Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 15,000 Dth

Flow Date(s) Requested: February 3, 2016

Time of Request: 8:30:00 pm February 2, 2016

Reason for Request: Southern System scheduled quantities 15,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 36,000 Dth

Flow Date(s) Requested: April 25, 2016

Time of Request: 8:45:00 pm April 24, 2016

Reason for Request: Southern System scheduled quantities 35,965 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 72,000 Dth

Flow Date(s) Requested: May 2, 2016

Time of Request: 3:09:00 pm May 1, 2016

Reason for Request: Southern System scheduled quantities 71,736 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Otay Mesa)

Quantity Requested: 14,500 Dth

Flow Date(s) Requested: June 21, 2016

Time of Request: 02:16:00 pm June 21, 2016

Reason for Request: To maintain system integrity in the Southern System.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Otay Mesa)

Quantity Requested: 14,500 Dth

Flow Date(s) Requested: June 22, 2016

Time of Request: 02:18:00 pm June 21, 2016

Reason for Request: To maintain system integrity in the Southern System.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 30,000 Dth

Flow Date(s) Requested: July 7, 2016

Time of Request: 6:42:00 am July 7, 2016

Reason for Request: Southern System scheduled quantities 30,052 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 79,000 Dth

Flow Date(s) Requested: July 20, 2016

Time of Request: 7:39:00 am July 20, 2016

Reason for Request: Southern System scheduled quantities 79,090 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 60,000 Dth

Flow Date(s) Requested: July 21, 2016

Time of Request: 7:26:00 pm July 20, 2016

Reason for Request: Southern System scheduled quantities 60,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 48,000 Dth

Flow Date(s) Requested: July 21, 2016

Time of Request: 4:00:00 pm July 21, 2016

Reason for Request: Southern System scheduled quantities 48,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 240,000 Dth

Flow Date(s) Requested: July 22, 2016

Time of Request: 3:45:00 pm July 21, 2016

Reason for Request: Southern System scheduled quantities 240,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 228,144 Dth

Flow Date(s) Requested: July 22, 2016

Time of Request: 8:25:00 pm July 21, 2016

Reason for Request: Southern System scheduled quantities 228,144 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 162,971 Dth

Flow Date(s) Requested: July 23, 2016

Time of Request: 11:45:00 pm July 22, 2016

Reason for Request: Southern System scheduled quantities 162,971 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 33,000 Dth

Flow Date(s) Requested: July 24, 2016

Time of Request: 1:55:00 pm July 22, 2016

Reason for Request: Southern System scheduled quantities 33,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 53,000 Dth

Flow Date(s) Requested: July 25, 2016

Time of Request: 1:51:00 pm July 22, 2016

Reason for Request: Southern System scheduled quantities 53,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 200,000 Dth

Flow Date(s) Requested: July 25, 2016

Time of Request: 8:25:00 pm July 24, 2016

Reason for Request: Southern System scheduled quantities 200,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 51,000 Dth

Flow Date(s) Requested: July 25, 2016

Time of Request: 12:48:00 pm July 25, 2016

Reason for Request: Southern System scheduled quantities 51,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 155,000 Dth

Flow Date(s) Requested: July 26, 2016

Time of Request: 7:48:00 pm July 25, 2016

Reason for Request: Southern System scheduled quantities 155,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 169,000 Dth

Flow Date(s) Requested: July 27, 2016

Time of Request: 7:42:00 pm July 26, 2016

Reason for Request: Southern System scheduled quantities 169,077 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 268,000 Dth

Flow Date(s) Requested: July 28, 2016

Time of Request: 7:53:00 pm July 27, 2016

Reason for Request: Southern System scheduled quantities 268,319 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 250,000 Dth

Flow Date(s) Requested: July 29, 2016

Time of Request: 7:41:00 pm July 28, 2016

Reason for Request: Southern System scheduled quantities 249,674 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 24,000 Dth

Flow Date(s) Requested: August 3, 2016

Time of Request: 7:50:00 pm August 2, 2016

Reason for Request: Southern System scheduled quantities 24,268 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 41,000 Dth

Flow Date(s) Requested: August 15, 2016

Time of Request: 7:36:00 pm August 14, 2016

Reason for Request: Southern System scheduled quantities 41,520 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 39,000 Dth

Flow Date(s) Requested: August 19, 2016

Time of Request: 7:50:00 pm August 18, 2016

Reason for Request: Southern System scheduled quantities 39,000 Dth below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department requested the Operational Hub to acquire gas supplies for system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 14,000 Dth

Flow Date(s) Requested: August 22, 2016

Time of Request: 8:46:00 pm August 21, 2016

Reason for Request: Southern System scheduled quantities 13,809 Dth below the southern system minimum flowing supply requirement.

ATTACHMENT E

Advice No. 5040

BASELOAD INDEX PRICES, NGI BIDWEEK AVERAGE

Baseload Index Prices - NGI Bidweek Average

	SoCal Border	SoCal Border + \$.082	SoCal Citygate	SoCal Citygate x 90%
Dec 2015	\$2.4200	\$2.5020	\$2.5900	\$2.3310
Jan 2016	\$2.5800	\$2.6620	\$2.7600	\$2.4840
Feb 2016	\$2.2400	\$2.3220	\$2.4400	\$2.1960
Mar 2016	\$1.6200	\$1.7020	\$1.7900	\$1.6110
Aug 2016	\$2.7600	\$2.8420	\$2.7900	\$2.5110

Spot sales of unsold Summer Baseload Gas (Sec. 29):

	SoCal Citygate	SoCal Citygate x 90%
8/1/2016	\$3.0158	\$2.7142
8/2/2016	\$2.9210	\$2.6289
8/3/2016	\$2.8585	\$2.5727
8/4/2016	\$2.7880	\$2.5092
8/5/2016	\$2.8809	\$2.5928
8/6/2016	\$2.7371	\$2.4634
8/7/2016	\$2.7371	\$2.4634
8/8/2016	\$2.7371	\$2.4634
8/9/2016	\$2.9149	\$2.6234
8/10/2016	\$2.7657	\$2.4891
8/11/2016	\$2.7446	\$2.4701
8/12/2016	\$2.7049	\$2.4344
8/13/2016	\$3.0093	\$2.7084
8/14/2016	\$3.0093	\$2.7084
8/15/2016	\$3.0093	\$2.7084
8/16/2016	\$3.5463	\$3.1917
8/17/2016	\$3.4018	\$3.0616
8/18/2016	\$3.0741	\$2.7667
8/19/2016	\$2.7924	\$2.5132
8/20/2016	\$2.6255	\$2.3630
8/21/2016	\$2.6255	\$2.3630
8/22/2016	\$2.6255	\$2.3630

8/23/2016	\$2.9273	\$2.6346
8/24/2016	\$2.7662	\$2.4896
8/25/2016	\$2.7845	\$2.5061
8/26/2016	\$2.8022	\$2.5220
8/27/2016	\$2.6905	\$2.4215
8/28/2016	\$2.6905	\$2.4215
8/29/2016	\$2.6905	\$2.4215
8/30/2016	\$3.0850	\$2.7765
8/31/2016	\$3.0802	\$2.7722

ATTACHMENT F

Advice No. 5040

OVERNOMINATION EVENT INFORMATION ANALYSIS

ATTACHMENT G

Advice No. 5040

TRANSACTIONS, CONFIDENTIAL

**CONFIDENTIAL AND PROTECTED MATERIAL PROVIDED ONLY TO THE ENERGY
DIVISION PURSUANT TO PUC SECTION 583, GO 66-C, AND D.16-08-024**

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF GWEN R. MARELLI
REGARDING CONFIDENTIALITY OF CERTAIN DATA
PURSUANT TO DECISION (D.) 16-08-024**

I, Gwen R. Marelli, do declare as follows:

1. I am the Director of Energy Markets and Capacity Products in the Energy Markets and Capacity Products department for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Jimmie I. Cho, Senior Vice President—Gas Operations and System Integrity. I have reviewed Attachment G to Advice No. 5040, 2016 Annual Compliance Report on Utility System Operator’s Southern System Reliability Purchases and Sales (September 1, 2015 through August 31, 2016), submitted concurrently herewith (AL 5040 Attachment G). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with D. 16-08-024.

3. For the reasons set forth in Attachment A to this Declaration, the information identified as confidential in AL 5040 Attachment G should receive confidential treatment and be protected from public disclosure under applicable statutory provisions including, but not limited to, General Order (GO) 66-C, Section 2.2(b), and Public Utilities Code Section 583.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of October 2016, at Los Angeles, California.



Gwen R. Marelli
Director – Energy Markets and
Capacity Products

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

ATTACHMENT A

SoCalGas Request for Confidentiality

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
AL 5040 Attachment G	Counterparty names	Gov't Code 6254(k), 6254.7 (d); Evid. Code 1060; Civil Code 3426 et set. GO 66-C Section 2.2(b), 2.8 D.09-08-018, 2011 WL 660568 (2011)	Specific trade information on volume and price in connection with the correlated counterparty (seller or buyer) must be kept confidential pursuant to the confidentiality provisions within our trading agreements (NAESB) with third parties. This data is market sensitive and disclosure of it would place SoCalGas at an unfair business disadvantage. Since the net costs of these transactions (purchases and sales) are recovered in customer's rates, SoCalGas' unfair business disadvantage would also be against the public interest. If the Commission mandates the release of this information, it would expose SoCalGas' trading parties and impact all future negotiations. Thus, the release of this non-public, confidential information would allow market participants to utilize this information to SoCalGas' business disadvantage, and thus ratepayer disadvantage.