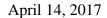
#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



**Advice Letter 5110** 

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

Subject: Expedited AL Approval for a Capacity Contract Between SoCalGas and Transwestern Pipeline Company, LLC

Dear Mr. van der Leeden:

Advice Letter 5110 is effective as of April 19, 2017.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Randoft



Ronald van der Leeden Director Regulatory Affairs

555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011 Tel: 213.244.2009

Fax: 213.244.4957 RvanderLeeden@semprautilities.com

March 29, 2017

Advice No. 5110 (U 904G)

Public Utilities Commission of the State of California

**Subject: Expedited Advice Letter Approval for a Capacity Contract between** 

Southern California Gas Company and Transwestern Pipeline Company,

LLC

### **Purpose**

Southern California Gas Company (SoCalGas) respectfully requests approval of the interstate capacity contract with Transwestern Pipeline Company, LLC (Transwestern) described below.

#### **Background**

Under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022, contracts for interstate capacity supported by the Office of Ratepayer Advocates (ORA) and The Utility Reform Network (TURN) may be submitted for approval to the Commission by an Expedited Advice Letter. ORA and TURN have been consulted and do not oppose the capacity contract as described.

### **Description of Contract**

The terms of the contract are confidential and are described in Attachment A. This filing will not create any deviations from SoCalGas' tariffs, cause withdrawal of service from any present customer, or impose any more or less restrictive conditions.

### **Confidentiality**

Due to the confidential nature of the contract, which contains market-sensitive negotiated core capacity contract terms, a Confidential Attachment A, pursuant to General Order (GO) 66-C, Section 583 of the Public Utilities Code, and D.16-08-024, is being provided to Energy Division and ORA, and to TURN under the confidentiality provisions of a non-disclosure agreement. A declaration requesting confidential treatment is being provided to the Commission concurrently with this Advice Letter, pursuant to D.16-08-024.

### **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 10 days of the date this Expedited Advice Letter was filed with the Commission, which is April 8, 2017. 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 email to the attention of Franz Cheng (<a href="fcc@cpuc.ca.gov">fcc@cpuc.ca.gov</a>) and the Energy Division Tariff Unit (<a href="fcc@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a>). A copy of the protest shall also be sent via both e-mail <a href="mailto:and">and</a> facsimile to the addresses shown below on the same date it is mailed or delivered to the Commission.

Attn: Ray B. Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011

Facsimile No.: (213) 244-4957 E-Mail: rortiz@semprautilities.com

Attn: Joseph Mock

Regulatory Case Manager - GT14D6

555 West Fifth Street

Los Angeles, CA 90013-1011 Facsimile No.: (213) 244-4957 E-Mail: <u>imock@semprautilities.com</u>

### **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 GO 96-B. SoCalGas respectfully requests that this filing become effective on April 19, 2017, which is 21 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 list in R.04-01-025. Address change requests to the GO 96-B should be directed by electronic mail to <a href="mailto:tariffs@socalgas.com">tariffs@socalgas.com</a> or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at <a href="mailto:Process\_Office@cpuc.ca.gov">Process\_Office@cpuc.ca.gov</a>.

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:   | Contact Person: Ray B. Ortiz       |   |  |  |
| ☐ ELC ☐ GAS   | Phone #: (213) <u>244-3837</u>     |   |  |  |
| ☐ PLC ☐ HEAT ☐ WATER  | E-mail: ROrtiz@semprautilities.com |   |  |  |
| EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)  |                                    |   |  |  |
| ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water   |                                    |   |  |  |
| Advice Letter (AL) #: 5110  |                                    |   |  |  |
| Subject of AL: Expedited Advice Letter Approval for a Capacity Contract between Southern California Gas   |                                    |   |  |  |
| Company and Transwestern Pipeline Company, LLC  |                                    |   |  |  |
| Keywords (choose from CPUC listing): Contracts; Capacity  |                                    |   |  |  |
| AL filing type:   Monthly  Quarterly  Annual  One-Time  Other  Periodic   |                                    |   |  |  |
| If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:   |                                    |   |  |  |
| D.04-09-022   |                                    |   |  |  |
| 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   |                                    |   |  |  |
|   | <b>F</b>                           |   |  |  |
| Does AL request confidential treatment? If so, provide explanation: See the Declaration of Confidentiality.   |                                    |   |  |  |
| Resolution Required?   Yes   No   |                                    | Tier Designation: 1 2 3                                     |  |  |
| Requested effective date: <u>4/19/17</u> No. of tariff sheets: <u>0</u>   |                                    | No. of tariff sheets: <u>0</u>                              |  |  |
| Estimated system annual revenue effec   | ct: (%): <u>None</u>               |   |  |  |
| 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: None   |                                    |   |  |  |
| Service affected and changes proposed <sup>1</sup> : N/A  |                                    |   |  |  |
| Pending advice letters that revise the same tariff sheets: None   |                                    |   |  |  |
| Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to: |                                    |   |  |  |
| CPUC, Energy Division   |                                    | Southern California Gas Company                             |  |  |
| Attention: Tariff Unit  |                                    | Attention: Ray B. Ortiz                                     |  |  |
| 505 Van Ness Ave.<br>San Francisco, CA 94102  |                                    | 555 West Fifth Street, GT14D6<br>Los Angeles, CA 90013-1011 |  |  |
| EDTariffUnit@cpuc.ca.gov  |                                    | ROrtiz@semprautilities.com                                  |  |  |

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

### ATTACHMENT A

Advice No. 5110

Terms of Capacity Contract Between Southern California Gas Company (SoCalGas) and Transwestern Pipeline Company, LLC (Transwestern)

This Attachment is being provided only to the Energy Division and Office of Ratepayer Advocates under the confidentiality provisions of the General Order 66-C, Section 583 of the Public Utilities Code, and D.16-08-024 and to The Utility Reform Network under a nondisclosure agreement.

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

## DECLARATION OF PAULINE C. WAH REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.16-08-024

I, Pauline C. Wah, do declare as follows:

- 1. I am the Gas Transportation Manager, designated by Paul Goldstein, Officer and VP Gas Acquisition in the Gas Acquisition Department for Southern California Gas Company ("SoCalGas"). I have reviewed the Expedited Advice Letter No. 5110, seeking approval for the capacity contracts between SoCalGas and Transwestern Pipeline Company, LLC, submitted concurrently herewith ("AL 5110"). In addition, 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 Decision ("D.16-08-024") to demonstrate that the confidential information ("Protected Information") provided in AL 5110 submitted concurrently herewith, is within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities ("PUC") Code § 583, and General Order ("GO") 66-C, as described in Attachment A.
- 3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

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 29th day of March, 2017, at Los Angeles, California.

Pauline C. Wah

Gas Transportation Manager

### ATTACHMENT A

# SoCalGas Request for Confidentiality on the following information provided in AL 5110

| Location/Title of Protected<br>Information | Legal Justification for<br>Withholding                   | Basis for Confidentiality Treatment   |
|--|--|---|
| Attachment A to AL 5110                    | GO 66-C Section 2.2(b)                                   | Market-sensitive negotiated core capacity contract terms, if disclosed, would put       |
|  | Gov't Code §§6254(k), 6254.7                             | SoCalGas and the pipeline at a competitive  |
|  | (d), Evidence Code 1060, Civil                           | disadvantage, because it would give other   |
|  | Code §3426 et seq.                                       | shippers, competitors, or market participants insight into SoCalGas' and the pipeline's |
|  | See, e.g., D.09-08-018, 2011 WL                          | negotiating positions.  |
|  | 660568 (2011) (agreeing that                             |   |
|  | confidential prices and contract                         | The disclosure of this information would be   |
|  | terms specifically negotiated                            | against the public interest because the release   |
|  | with a program vendor is                                 | of this information could result in higher  |
|  | proprietary and commercially sensitive and should remain | transportation costs to core ratepayers.  |
|  | confidential)  | SoCalGas derives economic value from this   |
|  |  | information being confidential, and it is   |
|  |  | subject to efforts by SoCalGas to maintain its  |
|  |  | confidentiality.  |