

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 30, 2018

**Advice Letter 5193**

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

**SUBJECT: 2017 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (9/1/16 thru 8/31/17).**

Dear Mr. van der Leeden:

Advice Letter 5193 is effective as of October 2, 2018 per Resolution # G-3542.

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  
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[RvanderLeeden@semprautilities.com](mailto:RvanderLeeden@semprautilities.com)

October 2, 2017

Advice No. 5193  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: 2017 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (September 1, 2016 through August 31, 2017)**

Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) its 2017 Annual Compliance Report (ACR) to demonstrate that activities to maintain Southern System reliability from September 1, 2016 through August 31, 2017 are in compliance with the standards, criteria, and procedures described in Sections 11 through 21 of SoCalGas Rule No. 41. SoCalGas also requests revisions to its tariffs, as shown on Attachment I, that future Annual Compliance Reports be submitted by November 1, rather than October 1, for the reasons described herein.

### **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.<sup>1</sup> The Annual Compliance Report shall be submitted to the Energy Division by Advice Letter and shall be subject to comment or protest. Upon

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<sup>1</sup> 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.

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 shall be amortized in customer transportation rates over the following year.<sup>2</sup>

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 percents 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.<sup>3</sup>

## **Discussion**

In accordance with Rule No. 41, SoCalGas hereby submits its ACR for the 12-month period ending August 31, 2017. SoCalGas believes that all the transactions described in this ACR are reasonable and subject to amortization in customer transportation rates during 2018.

### **A. Transaction Overview**

As shown in Attachment A, from September 1, 2016 through August 31, 2017, SoCalGas spent \$7,397,711 to help satisfy Southern System minimum flow requirements. SoCalGas purchased 47,596,167 dths (net of in-kind fuel) of gas at

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<sup>2</sup> 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)."

<sup>3</sup> Resolution G-3480 at pp. 11-12 and pp. 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.

Ehrenberg for \$151,618,317. This gas was then resold at the SoCal Citygate for \$157,545,041 for a net gain of \$5,926,724. In addition to this net purchase gain, the System Operator incurred \$13,324,434 of transportation charges.

## **B. Transaction Detail**

Attachment B provides the details of the purchases and sales are summarized in Attachment A.<sup>4</sup> In compliance with Resolution G-3480, Table 1 below presents the number and percent of transactions, the corresponding dollar amount, and percent of total dollars for each section of Rule No. 41.<sup>5</sup> The transactions are classified into the four sections of Rule No. 41, "Purchases and Sales to Manage Minimum Flow Supplies," as follows:

- i. Section 15 of Rule No. 41: 2% of purchases were within the automatic safe harbor price limits for spot gas purchases and resales. Attachment C shows the ICE calculations for the Section 15 purchases and sales.<sup>6</sup> All purchases were in response to System Operator requests for supply as documented in Attachment D.
- ii. Section 16 of Rule No. 41: 2% of purchases were within the parameters for spot gas purchases described in Section 16.<sup>7</sup> Attachment B shows at least 3 offers from different suppliers.
- iii. Section 18 of Rule No. 41: Three small transactions totaling less than 0.4% of total purchases are reasonable pursuant to Section 18 of Rule No. 41.<sup>8</sup> These three transactions are TC# 3241, TC# 3258, and TC# 3313. Pursuant to

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<sup>4</sup> 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 (OP) 2.

<sup>5</sup> See Resolution G-3480, OP 3.(b), which states: *"Incorporates a table, in the text of the ACR, that presents the number and percent of transactions and the corresponding dollar amount and percent of total dollars that SoCalGas asserts are reasonable by nature of having met the requirements of Rule 41."*

<sup>6</sup> 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.

<sup>7</sup> 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."*

<sup>8</sup> Section 18 states: *"Purchases and sales other than those described in Sections 14 and 15 (currently re-numbered as Sections 15 and 16, respectively) above will not be deemed unreasonable but shall be subject to review and any requests for explanation by the CPUC Energy Division in conjunction with the Annual Compliance Report described in Section 25 (currently re-numbered as Section 27) below."*

Section 18, SoCalGas provides the following information supporting the reasonableness of the three transactions.

- TC# 3241
  - At 7:50 p.m. on Saturday, June 24, 2017, Gas Control requested 60,000 Dth for flow day Sunday, June 25, 2017, to meet the Southern System minimum flow requirement. Because most gas suppliers are located in time zones east of California, text messages were sent asking for offers. No responses were received. The next morning, Sunday, text messages, phone calls, and instant messages were sent to suppliers; only one supplier responded with gas supply. There were also no offers on ICE. The lone supplier with gas available at Ehrenberg had 40,000 Dth of the 60,000 Dth requested at \$3.16/Dth, approximately 24 cents outside the safe harbor limit. As a result of the illiquidity of weekend trading and the need for the gas to support the Southern System, the only offer available was purchased.
  
- TC# 3258
  - At 7:50 p.m. on Saturday, July 8, 2017, Gas Control requested 64,000 Dth for flow day Sunday, July 9, 2017, to meet the Southern System minimum flow requirement. Because most gas suppliers are located in time zones east of California, text messages were sent asking for offers. No responses were received. The next morning, Sunday, text messages, phone calls, and instant messages were sent to suppliers. There were no offers on ICE. Only one supplier had gas available to sell. SoCalGas purchased the 64,000 dth from the supplier at \$3.50, approximately 29 cents outside the safe harbor limit. The Citygate sale associated with this purchase averaged approximately \$3.48, resulting in a net cost of 2 cents excluding BTS.
  
- TC# 3313
  - After the second day of a Southern California heat wave where system sendout reached 3.6 Bcf (the highest summer peak in several years), Gas Control requested 40,000 dth of additional Ehrenberg supplies for cycle 4 at 11:30 a.m. on Tuesday, August 29, 2017, due to a 95% reduction in the interruptible “best efforts” gas supply purchased for cycle 3. After contacting eight suppliers, only one was able to sell firm gas supply at Ehrenberg. This firm supply was necessary to avoid a Section 14 purchase from the Utility Gas Procurement Department as the “provider of last resort.” Since there were not three offers, it was classified as Section 18.

- iv. Section 20 of Rule No. 41: All baseload contracts, representing 96% of purchases, were within the parameters described in Section 20 of Rule No. 41.<sup>9</sup>

Confidential Attachment E shows the price table required by Resolution G-3504, OP 3:

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

These price indices are confidential and being submitted only to the Energy Division pursuant to the confidentiality provisions of PUC Section 583, General Order (GO) 66-C, and D.16-08-024.

Southern System Purchases, September 2016 - August 2017				
Rule 41	# Transactions	Transaction %	Purchase \$	Purchase %
Section 15	19	31	\$ 2,654,659	2
Section 16	19	31	\$ 2,517,134	2
Section 18	3	5	\$ 570,400	0.4
Section 20	21	34	\$ 145,876,124	96
Total	62	100	\$ 151,618,317	100

For the ACR period September 2016 through August 2017, the average net cost (purchase price minus sale price plus transport cost) of the spot gas purchases (Sections 15, 16, and 18) was 0.46 cents/dth.<sup>10</sup> The average net cost of the baseload

<sup>9</sup> 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 in the months of December through March and 200,000 Dth/day in the months of July through September; (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); (3) the term is for the December-March or the July-September periods, or any subset of those periods; 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 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 March 31, 2019, unless extended by the Commission. SoCalGas may seek extension or modification of this provision by standard advice filing or application."

<sup>10</sup> See Attachment B, cell S112.

purchases (Sections 20) was 0.14 cents/dth.<sup>11</sup> The average net cost of spot and baseload purchases was 0.16 cents/dth.<sup>12</sup>

Attachment F shows the calculation of the daily amount of required support purchases at SoCalGas' Southern System for the two SSR baseload periods (Aug-16 to Sep-16, and Dec-16 to Mar-17) in the absence of summer and winter baseload contracts.

Table 2 evaluates the effectiveness of SoCalGas' baseload contracts for the Southern System.

<b>Table 2</b>			
	Aug 2016 – Mar 2017 Volume (MMDth)	Net Cost (\$Millions)	Average Net Cost (\$/Dth)
Baseload	42.8	\$7.37	\$0.17
Additional Spot Purchases Needed in Absence of Baseload	12.0 <sup>13</sup>	\$5.04 <sup>14</sup>	\$0.42
		(\$2.33)	

The 42.8 MMDth baseload purchases at a 17 cent/dth net cost allowed SoCalGas to avoid purchasing 12.0 MMDth of spot gas at a higher net cost of \$0.42/dth. While some decent summer price volatility generated a modest benefit (~1MM) from the Summer Baseload contracts, given the very mild spot prices experienced over this past Winter 2016-2017 period, the net of the combined Summer & Winter base periods didn't generate a net overall savings. Nevertheless, the contracts provided insurance against the real possibility that spot prices could have been much higher and more volatile, as they were in Winter 2013-2014.

On July 8, 2016, the Commission approved SoCalGas' AL 4970 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 preauthorized baseload contracts have acted as an effective insurance policy protecting ratepayers from volatility in the spot market.<sup>15</sup>

<sup>11</sup> See Attachment B, cell S168.

<sup>12</sup> See Attachment B, cell S171.

<sup>13</sup> See Attachment F, Tab <SSR ACR Yr Summary(2016-17)> cell E8.

<sup>14</sup> See Attachment F, Tab <SSR ACR Yr Summary(2016-17)> cell E9.

<sup>15</sup> See page 3 of the disposition letter approving AL 4970.

On May 26, 2017, the CPUC's Energy Division approved SoCalGas AL 5132, which was filed on May 3, 2017 requesting to revise Rule No. 41 to provide the System Operator with preauthorization to enter into baseload contracts for July, August, and September of 2017 and 2018 to support Southern System reliability during the peak summer months.

In Resolution G-3525, issued on August 10, 2017, it was ordered that:

In subsequent Annual Compliance Reports on Utility System Operator's Southern Reliability Purchases and Sales filings, SoCalGas shall inform the Commission whether there is a need to revise the conditions of the baseload contracts to reflect market or operating conditions.

Given the current market and operating conditions, SoCalGas believes that there is no need to revise the conditions of the baseload contracts. The current conditions provide the right balance between maintaining supply reliability at the Southern System and keeping costs at a reasonable level. Rule No. 41 currently allows SoCalGas to procure baseload for up to 200,000Dth/day in the summer and 255,000Dth/day in the winter. These volumes represent approximately 32% of the average minimum posted requirement during the peak summer months of 2016 and 36% of the minimum requirement during the prior winter. Under normal circumstances, additional shortfalls not covered by baseload supplies are likely to result from short-term day to day fluctuations in the supply and demand balance. Such potential short-term shortfalls are better solved through supplemental spot purchases rather than additional baseload contracts. For that reason, the baseload volumes in Rule No. 41 should not be changed.

The existing price safe harbor has allowed for the successful purchase of winter and summer baseload contracts for several years. As shown in Section 20, SoCalGas has successfully purchased summer and winter baseload contracts at prices below the safe harbor. Yet, natural gas is a volatile commodity. The annualized volatility for the SoCal Border contract with the nearest expiration often exceeds 40%. SoCalGas recommends that the safe harbor price, as currently described in Rule No. 41, not be changed because it ensures that costs are kept reasonable while allowing for the purchase of baseload contracts when prices are high and reliable supply may be most needed at the Southern System.

Confidential Attachment H 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 PUC Section 583, General Order (GO) 66-C, and D.16-08-024.



### **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.<sup>16</sup> The referenced over-nomination event information is provided below.

#### *a. Frequency*

Frequency analysis is included as Attachment G to this AL. In the reporting period, there were a total of 70 days where a Southern System reliability spot and baseload purchase coincided with a High Operational Flow Order (Hi-OFO)<sup>17</sup>.

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

In the reporting period, there were a total of 70 days where a Southern System reliability purchase coincided with a Hi-OFO. On 53 of these days, scheduled volumes at the Southern System when the OFO was declared were much higher (between 5,000 dth and 288,000 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.

For 13 of these Hi-OFO days, the scheduled volumes at the Southern System was higher than 100% of the Southern System minimum. On 11 of the 13 days, the scheduled volumes at the Southern System was higher than 100% of the Southern System minimum by an average of 24,000 dth, or just 4%. Supplies at other receipt points on those days declined by an average of 85,000 dth, or 4%. Had the minimum been 100%, rather than 110%, the supplies at the other receipt points would have decreased by an average of 38,000 dth or 2%. On two of the 13 days, total scheduled volumes at the other receipt points did not decline.

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<sup>16</sup> See Resolution G-3486, OP 2.

<sup>17</sup> Out of 233 days; see Attachment G.

On the remaining 4 days, scheduled volumes in the Southern System were lower than 100% of the minimum after the Hi-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.

In summary, there were 11 days where the 110% minimum affected other receipt points. On average, supplies at those points were reduced by 46,000 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 to hedge against the possibility that supplies nominated into the Southern System do not materialize.

### **Proposed Tariff Revisions**

As shown in Attachment I, SoCalGas proposes to modify Rule No. 41, Section 27, to file the ACR annually on November 1 instead of October 1 to fully reflect the entire summer baseload contracts which end on September 30, based on AL 5132. Accordingly, SoCalGas would submit its next ACR on November 1, 2018 to show gas purchases during the thirteen-month period from September 1, 2017 through September 30, 2018. Future ACRs would be filed annually on November 1 to show gas purchases for the twelve-month period from October 1 through September 30.

### **Conclusion**

For the reasons set forth above, SoCalGas respectfully requests that the Commission approve the ACR and determine that all the transactions entered into the SRMA balance for September 1, 2016 through August 31, 2017 are reasonable and subject to amortization in customer transportation rates during 2018 and the proposed tariff revisions.

### **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 22, 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 e-mail to the attention of Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: 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](mailto:ROrtiz@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. Therefore, SoCalGas respectfully requests that this filing be approved on or before the Commission meeting of December 14, 2017.

### **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](mailto:tariffs@socalgas.com) 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 [process\\_office@cpuc.ca.gov](mailto:process_office@cpuc.ca.gov).

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Ronald van der Leeden  
Director - Regulatory Affairs

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

ELC     GAS  
 PLC     HEAT     WATER

Contact Person: Ray Ortiz

Phone #: (213) 244-3837

E-mail: [ROrtiz@semprautilities.com](mailto:ROrtiz@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) #: 5193

Subject of AL: 2017 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (September 1, 2016 through August 31, 2017)

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 AL<sup>1</sup>: 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: 12/14/17

No. of tariff sheets: 3

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: Rule No. 41 and TOCs

Service affected and changes proposed<sup>1</sup>: 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](mailto:EDTariffUnit@cpuc.ca.gov)

Southern California Gas Company  
Attention: Ray Ortiz  
555 West 5<sup>th</sup> Street, GT14D6  
Los Angeles, CA 90013-1011  
[ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)  
[Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

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

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

**DECLARATION OF M. MICHELLE DANDRIDGE  
REGARDING CONFIDENTIALITY OF CERTAIN DATA  
PURSUANT TO DECISION (D.) 16-08-024**

I, M. Michelle Dandridge, do declare as follows:

1. I am the Manager of Transmission and Storage Strategy for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Rodger R. Schwecke, Senior Vice President—Gas Transmission and Storage. I have reviewed Attachment E and Attachment H to Advice No. 5193, 2017 Annual Compliance Report on Utility System Operator’s Southern System Reliability Purchases and Sales (September 1, 2016 through August 31, 2017), submitted concurrently herewith (“AL 5193 Attachments”). 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 5193 Attachment E and Attachment H 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 2<sup>nd</sup> day of October 2017, at Los Angeles, California.

  
\_\_\_\_\_  
M. Michelle Dandridge  
Manager of Transmission and  
Storage Strategy

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

**ATTACHMENT A**

**SoCalGas Request for Confidentiality**

<b>Location of Data</b>	<b>Description of Data</b>	<b>Applicable Confidentiality Provisions</b>	<b>Basis for Confidentiality</b>
AL 5193 Attachment H	Counterparty names	<p>Gov't Code 6254(k), 6254.7 (d); Evid. Code 1060; Civil Code 3426 et set.</p> <p>GO 66-C Section 2.2(b), 2.8</p> <p>D.09-08-018, 2011 WL 660568 (2011)</p>	<p>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.</p> <p>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.</p>



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

**ATTACHMENT A (CONT.)**

**SoCalGas Request for Confidentiality**

<b>Location of Data</b>	<b>Description of Data</b>	<b>Applicable Confidentiality Provisions</b>	<b>Basis for Confidentiality</b>
AL 5193 Attachment E	Baseload Index Prices – Natural Gas Intelligence (NGI) Bidweek Average	Decision (D.) 11-01-036, 2011 WL 660568 (2011)	Bidweek information on monthly price indices for SoCal-Ehrenberg and SoCal- Citygate must be kept confidential pursuant to the provisions within SoCalGas' license agreement with NGI.



**ATTACHMENT A**

**Advice No. 5193**

**SUMMARY OF PURCHASES/SALES**  
**Southern System Minimum Flow Purchases**  
**September 2016 thru August 2017**

Southern System Minimum Flow Purchases  
Summary Sept 2016 thru August 2017

Month	Request (Dth)	Purchases				Sales		Sub-Total Net Cost \$	Transport \$ Amt	Total Net Cost \$
		Quantity (Dth)	In-Kind (Dth)	Net (Dth)	\$ Amt	Quantity (Dth)	\$ Amt			
Sep-16	6,105,000	6,093,689	5,272	6,088,417	\$17,451,938	6,088,417	-\$34,504	\$1,136,316	\$1,101,813	
Oct-16	332,000	332,000	391	331,609	\$1,031,015	331,609	\$39,099	\$61,848	\$100,948	
Nov-16	178,000	178,000	211	177,789	\$451,200	177,789	\$28,302	\$33,160	\$61,462	
Dec-16	7,905,000	7,876,191	9,270	7,866,921	\$27,631,539	7,866,921	(\$893,078)	\$1,470,890	\$577,812	
Jan-17	8,000,000	7,909,561	10,592	7,898,969	\$30,800,312	7,898,969	(\$87,199)	\$2,562,622	\$2,475,423	
Feb-17	7,140,000	7,109,772	8,253	7,101,519	\$23,876,311	7,101,519	(\$1,162,775)	\$2,287,140	\$1,124,365	
Mar-17	7,905,000	7,832,712	9,097	7,823,615	\$19,646,391	7,823,615	(\$1,445,114)	\$2,532,191	\$1,087,077	
Apr-17	0	0	0	0	\$0	0	\$0	\$0	\$0	
May-17	0	0	0	0	\$0	0	\$0	\$0	\$0	
Jun-17	255,000	223,875	677	223,198	\$716,786	223,198	\$55,340	\$89,696	\$145,036	
Jul-17	3,864,000	3,861,654	5,949	3,855,705	\$11,540,014	3,855,805	(\$819,140)	\$1,237,496	\$418,356	
Aug-17	6,336,000	6,238,031	9,606	6,228,425	\$18,472,812	6,228,325	(\$1,607,655)	\$1,913,075	\$305,420	
<b>Total =&gt;</b>	<b>48,020,000</b>	<b>47,655,485</b>	<b>59,318</b>	<b>47,596,167</b>	<b>\$151,618,317</b>	<b>47,596,167</b>	<b>(\$5,926,724)</b>	<b>\$13,324,434</b>	<b>\$7,397,711</b>	

**ATTACHMENT B**

**Advice No. 5193**

**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 needed (Dths)	TC#	Amt (Dths)	BTS inkind	Net Amt flowed	Purchase Price \$/dth	Rule 41 Limit \$/dth	\$Amt	BTS Charge	Flow Date	TC#	Amt (Dths)	Sale Price \$/dth	Rule 41 Limit \$/dth	\$Amt								
9/25/16	9/26/16	3	105,000	3156	104,999	91	104,908	\$3,3000	15(b)	\$346,496.70	\$19,543	9/26/16	3157	104,908	\$2,9500	15(b)	\$309,478.60								
10/12/16	10/13/16	3	41,000	3175	41,000	48	40,952	\$3,0500	15(b)	\$125,050.00	\$7,638	10/13/16	3176	40,952	\$2,9500	15(b)	\$120,808.40								
10/14/16	10/15/16	3	36,000	3177	36,000	42	35,958	\$3,0000	15(b)	\$108,000.00	\$6,706	10/15/16	3178	35,958	\$2,5000	15(b)	\$89,895.00								
10/16/16	10/17/16	3	75,000	3179	75,000	88	74,912	\$3,0000	15(b)	\$225,000.00	\$13,972	10/17/16	3180	74,912	\$2,8200	15(b)	\$211,251.84								
10/18/16	10/19/16	3	81,000	3184	5,500	6	5,494	\$3,2500	15(b)	\$17,875.00	\$1,025	10/20/16	3187	20,000	\$3,2850	15(b)	\$65,700.00								
				3185	30,000	36	29,964	\$3,2500	15(b)	\$97,500.00	\$5,589	10/20/16	3188	20,000	\$3,2850	15(b)	\$65,700.00								
				3186	20,000	24	19,976	\$3,2700	15(b)	\$65,400.00	\$3,726	10/19/16	3190	15,000	\$3,3000	15(b)	\$49,500.00								
				3189	25,500	30	25,470	\$3,3000	16	\$84,150.00	\$4,750	10/19/16	3191	1,100	\$3,3200	15(b)	\$3,652.00								
			Not Purchased		81,000			\$3,4800	16			10/20/16	3192	20,000	\$3,2850	15(b)	\$65,700.00								
			Not Purchased		19,000			\$3,4700	16			10/20/16	3195	1,000	\$3,2300	15(b)	\$3,230.00								
10/19/16	10/20/16	3	46,000	3194	46,000	54	45,946	\$3,2400	15(b)	\$149,040.00	\$8,569	10/20/16	3196	10,000	\$3,2100	15(b)	\$32,100.00								
												10/20/16	3197	10,000	\$3,2100	15(b)	\$32,100.00								
												10/20/16	3198	9,000	\$3,2100	15(b)	\$28,890.00								
												10/20/16	3199	1,000	\$3,1900	15(b)	\$3,190.00								
												10/20/16	3200	5,000	\$3,1750	15(b)	\$15,875.00								
												10/20/16	3201	10,000	\$3,1500	15(b)	\$31,500.00								
												10/21/16	3202	4,750	\$2,9500	15(b)	\$14,012.50								
10/20/16	10/21/16	3	53,000	3203	53,000	63	52,937	\$3,0000	15(b)	\$159,000.00	\$9,873	10/21/16	3204	52,937	\$3,0000	15(b)	\$158,811.00								
11/8/16	11/9/16	3	20,000	3207	20,000	24	19,976	\$2,2800	15(b)	\$45,600.00	\$3,726	11/9/16	3208	19,976	\$2,1800	15(b)	\$43,547.68								
11/13/16	11/14/16	3	88,000	3209	88,000	104	87,896	\$2,0000	15(b)	\$176,000.00	\$16,394	11/14/16	3210	87,896	\$1,8500	15(b)	\$162,607.60								
11/29/16	11/30/16	3	70,000	3214	70,000	83	69,917	\$3,2800	15(b)	\$229,600.00	\$13,040	11/30/16	3215	69,917	\$3,1000	15(b)	\$216,742.70								
1/24/17	1/24/17	4	45,000	3217	45,000	52	44,948	\$3,6000	15(b)	\$162,000.00	\$14,415	1/24/17	3218	44,948	\$3,4000	15(b)	\$152,823.20								
1/26/17	1/27/17	3	50,000	3219	50,000	58	49,942	\$3,5000	15(b)	\$175,000.00	\$16,016	1/27/17	3220	49,942	\$3,5000	15(b)	\$174,797.00								
6/18/17	6/19/17	3	95,000	3235	84,864	256	84,408	\$3,3500	16	\$283,624.40	\$26,917	6/19/17	3236	84,408	\$2,8700	15(b)	\$242,250.96								
			Not Purchased		40,000			\$3,6000	16																
			Not Purchased		20,000			\$3,9500	16																
6/24/17	6/25/17	3	60,000	3241	40,000	121	39,879	\$3,1600	18	\$126,400.00	\$17,951	6/25/17	3242	39,879	\$2,6800	15(b)	\$106,875.72								
6/25/17	6/26/17	3	100,000	3244	49,599	150	49,449	\$2,9700	16	\$147,309.03	\$28,828	6/30/17	3251	43,000	\$3,0300	15(b)	\$130,290.00								
				3245	14,884	45	14,839	\$3,0000	16	\$44,652.00	\$4,800	6/29/17	3252	6,449	\$3,1200	15(b)	\$20,120.88								
				3247	10,915	33	10,882	\$3,1000	16	\$33,836.50	\$3,520	6/26/17	3246	14,839	\$3,0000	15(b)	\$44,517.00								
				3249	23,813	72	23,741	\$3,4000	16	\$80,984.20	\$7,680	6/26/17	3248	10,882	\$3,3700	15(b)	\$36,672.34								
												6/26/17	3250	23,741	\$3,4000	15(b)	\$80,719.40								
7/4/17	7/5/17	3	80,000	3253	79,999	123	79,876	\$2,8500	15(b)	\$227,997.15	\$25,617	7/5/17	3254	79,876	\$2,4000	15(b)	\$191,702.40								
7/5/17	7/6/17	3	87,000	3255	87,000	134	86,866	\$3,3000	15(b)	\$287,100.00	\$27,869	7/6/17	3256	60,000	\$3,3000	15(b)	\$198,000.00								
												7/7/17	3257	26,866	\$3,5500	15(b)	\$95,374.30								
7/8/17	7/9/17	3	64,000	3258	64,000	99	63,901	\$3,5000	18	\$224,000.00	\$20,493	7/10/17	3261	10,000	\$3,4500	15(b)	\$34,500.00								
7/9/17	7/10/17	3	40,000	3259	25,000	39	24,961	\$3,5000	16	\$87,500.00	\$8,005	7/10/17	3262	9,500	\$3,4000	15(b)	\$32,300.00								
				3260	15,000	23	14,977	\$3,4500	16	\$51,750.00	\$4,803	7/10/17	3263	24,000	\$3,5000	15(b)	\$84,000.00								
			Not Purchased		40,000			\$4,1000	16			7/10/17	3264	30,000	\$3,5000	15(b)	\$105,000.00								
												7/10/17	3265	20,000	\$3,5500	15(b)	\$71,000.00								
												7/10/17	3266	10,339	\$3,6000	15(b)	\$37,220.40								
7/10/17	7/11/17	3	30,000	3267	30,000	46	29,954	\$3,4000	16	\$102,000.00	\$9,606	7/11/17	3268	10,000	\$3,2500	15(b)	\$32,500.00								
			Not Purchased		15,000			\$3,4500				7/11/17	3269	10,000	\$3,2700	15(b)	\$32,700.00								

Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Amt (Dths)	BTS inkind	Net Amt flowed	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
			Not Purchased		10,000			\$3,500				7/11/17	3270	9,954	\$3,250	15(b)	\$32,350.50	
7/13/17	7/14/17	3	66,000	3271	66,000	102	65,898	\$3,450	16	\$227,700.00	\$21,166	7/14/17	3272	23,900	\$3,250	15(b)	\$77,675.00	
			Not Purchased		66,000			\$4,100				7/17/17	3276	10,000	\$3,300	15(b)	\$33,000.00	
			Not Purchased		26,000			\$3,460				7/17/17	3277	10,000	\$3,280	15(b)	\$32,800.00	
												7/17/17	3278	20,000	\$3,300	15(b)	\$66,000.00	
7/14/17	7/15/17	2	50,000	3273	50,000	77	49,923	\$3,480	16	\$174,000.00	\$16,035	7/17/17	3279	4,200	\$3,280	15(a)/15(b)	\$13,776.00	
			Not Purchased		50,000			\$4,000										
			Not Purchased		50,000			\$4,150										
7/14/17	7/16/17	1	50,000	3274	50,000	77	49,923	\$3,480	16	\$174,000.00	\$16,035	7/17/17	3280	10,000	\$3,280	15(a)	\$32,800.00	
			Not Purchased		15,000			\$3,500										
			Not Purchased		10,000			\$3,500				7/18/17	3281	10,000	\$3,230	15(a)	\$32,300.00	
7/16/17	7/17/17	3	77,000	3275	77,000	119	76,881	\$3,350	16	\$257,950.00	\$24,694	7/18/17	3282	20,000	\$3,230	15(a)	\$64,600.00	
			Not Purchased		77,000			\$4,080										
			Not Purchased		50,000			\$3,450				7/19/17	3283	134,525	\$3,160	15(a)/15(b)	\$425,099.00	
7/18/17	7/19/17	3	50,000	3284	50,000	77	49,923	\$3,300	16	\$165,000.00	\$16,035	7/20/17	3285	2,200	\$3,210	15(b)	\$7,062.00	
			Not Purchased		50,000			\$3,430				7/20/17	3286	5,300	\$3,210	15(b)	\$17,013.00	
			Not Purchased		15,000			\$3,590				7/20/17	3287	10,000	\$3,210	15(b)	\$32,100.00	
												7/19/17	3288	32,423	\$3,500	15(b)	\$114,453.19	
7/19/17	7/20/17	3	70,000	3289	70,000	108	69,892	\$3,300	16	\$231,000.00	\$22,449	7/21/17	3290	65,000	\$3,280	15(b)	\$213,200.00	
			Not Purchased		70,000			\$3,470				7/24/17	3302	3,800	\$3,350	15(b)	\$12,730.00	
			Not Purchased		70,000			\$4,000				7/27/17	3303	1,089	\$3,225	15(b)	\$3,513.00	
7/23/17	7/24/17	3	20,000	3301	20,000	31	19,969	\$2,900	15(b)	\$58,000.00	\$6,412	7/27/17	3304	19,920	\$3,225	15(b)	\$64,241.02	
7/30/17	7/31/17	3	80,000	3306	79,848	123	79,725	\$3,340	16	\$266,692.32	\$25,638	7/31/17	3307	60,000	\$3,390	15(b)	\$203,400.00	
			Not Purchased		80,000			\$4,000					3308	10,000	\$3,400	15(b)	\$34,000.00	
			Not Purchased		50,000			\$4,260					3309	9,877	\$3,390	15(b)	\$33,483.03	
8/28/17	8/29/17	3	96,000	3310	received zero	0	0	\$4,250	15(b)	\$0.00	\$0							
				3311	20,000	31	19,969	\$4,500	16	\$90,000.00	\$6,109							
				3312	3,159	4	3,155	\$4,750	16	\$15,005.25	\$965							
			Not Purchased		10,000			\$4,750										
8/29/17	8/29/17	4	40,000	3313	40,000	62	39,938	\$5,500	18	\$220,000.00	\$12,218	8/29/17	3314	39,999	\$4,000	15(b)	\$159,996.00	
												8/31/17	3315	22,963	\$4,000	15(b)	\$91,852.00	

Total 1,865,000 1,760,880 2,755 1,758,125 5,742,193 498,828 1,758,125 5,425,100 \$815,921

Net Spot Cost (\$/Dth)=> \$ 0.46

**BASELOAD PURCHASES:**

Notification Minimum Flow										SALE									
Flow Month	Flow Date	Cycle	Amt needed (Dths)	TC#	Amt (Dths)	BTS inkind	Net Amt flowed	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	
September 2016	Monthly Vol.		6,000,000	2966	551,999	480	551,519	\$2,835	Sec 20	\$1,564,917.17	\$102,742.66	3042	1,450,739	\$2,875	Sec 20	\$4,170,874.63			
	Monthly Vol.			2967	600,000	510	599,490	\$2,845	Sec 20	\$1,707,000.00	\$111,678.99	3043	599,490	\$2,870	Sec 20	\$1,720,536.30			
	Monthly Vol.			2968	600,000	510	599,490	\$2,850	Sec 20	\$1,710,000.00	\$111,678.99	3044	895,309	\$2,870	Sec 20	\$2,569,536.83			
	Monthly Vol.			2969	592,891	505	592,386	\$2,850	Sec 20	\$1,689,739.35	\$111,678.99	3055	599,490	\$2,870	Sec 20	\$1,720,536.30			
	Monthly Vol.			2995	300,000	270	299,730	\$2,850	Sec 20	\$855,000.00	\$55,836.70	3059	599,460	\$2,870	Sec 20	\$1,720,450.20			
	Monthly Vol.			2971	896,085	776	895,309	\$2,850	Sec 20	\$2,553,842.25	\$167,515.69	3071	299,730	\$2,870	Sec 20	\$860,225.10			
	Monthly Vol.			3054	600,000	510	599,490	\$2,870	Sec 20	\$1,722,000.00	\$111,678.99	3077	592,386	\$2,8650	Sec 20	\$1,697,185.89			
	Monthly Vol.			3058	600,000	540	599,460	\$2,870	Sec 20	\$1,722,000.00	\$111,673.40	3081	946,905	\$2,870	Sec 20	\$2,717,617.35			
	Monthly Vol.			3070	300,000	270	299,730	\$2,870	Sec 20	\$861,000.00	\$55,836.70								

Date notified	Flow Date	Flow Cycle	Amt needed (Dths)	TC#	Amt (Dths)	BTS inkind	Net Amt flowed	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	
	Monthly Vol.			3080	947,715	810	946,905	\$2,8700	Sec 20	\$2,719,942.05	\$176,452.03								
December 2016	Monthly Vol.		7,905,000	3099	926,097	1,081	925,016	\$3,4950	Sec 20	\$3,236,709.02	\$173,047.58		3100	925,016	\$3,6300	Sec 20	\$3,357,808.08		
	Monthly Vol.			3121	619,979	744	619,235	\$3,5100	Sec 20	\$2,176,126.29	\$115,361.20		3122	619,235	\$3,6300	Sec 20	\$2,247,823.05		
	Monthly Vol.			3123	1,548,433	1,827	1,546,606	\$3,5100	Sec 20	\$5,434,999.83	\$288,408.78		3124	1,546,606	\$3,6400	Sec 20	\$5,629,645.84		
	Monthly Vol.			3170	1,540,932	1,818	1,539,114	\$3,5100	Sec 20	\$5,408,671.32	\$288,408.78		3171	1,539,114	\$3,6250	Sec 20	\$5,579,288.25		
	Monthly Vol.			3172	2,469,145	2,903	2,466,242	\$3,5100	Sec 20	\$8,666,698.95	\$461,456.35		3173	2,466,242	\$3,6200	Sec 20	\$8,927,796.04		
	Monthly Vol.			3181	771,605	897	770,708	\$3,5100	Sec 20	\$2,708,333.55	\$144,207.28		3182	770,708	\$3,6100	Sec 20	\$2,782,255.88		
January 2017	Monthly Vol.		7,905,000	3099	898,423	1,048	897,375	\$3,8850	Sec 20	\$3,490,373.36	\$297,903.04		3100	897,375	\$3,9200	Sec 20	\$3,517,710.00		
	Monthly Vol.			3121	619,871	713	619,158	\$3,9000	Sec 20	\$2,417,496.90	\$198,605.34		3122	619,158	\$3,9200	Sec 20	\$2,427,099.36		
	Monthly Vol.			3123	1,595,209	1,782	1,593,427	\$3,9000	Sec 20	\$5,987,315.10	\$496,508.38		3124	1,593,427	\$3,9300	Sec 20	\$6,026,368.11		
	Monthly Vol.			3170	1,550,000	1,798	1,548,202	\$3,9000	Sec 20	\$6,045,000.00	\$496,508.38		3171	1,548,202	\$3,9150	Sec 20	\$6,061,210.83		
	Monthly Vol.			3172	2,446,525	3,919	2,442,606	\$3,9000	Sec 20	\$9,541,447.50	\$794,411.42		3173	2,442,606	\$3,9100	Sec 20	\$9,550,589.46		
	Monthly Vol.			3181	764,533	1,222	763,311	\$3,9000	Sec 20	\$2,981,678.70	\$248,254.19		3182	763,311	\$3,9000	Sec 20	\$2,976,912.90		
February 2017	Monthly Vol.		7,140,000	3099	834,889	973	833,916	\$3,3450	Sec 20	\$2,792,703.71	\$269,073.71		3100	833,916	\$3,5300	Sec 20	\$2,943,723.48		
	Monthly Vol.			3121	557,727	642	557,085	\$3,3600	Sec 20	\$1,873,962.72	\$179,385.47		3122	557,085	\$3,5000	Sec 20	\$1,966,510.05		
	Monthly Vol.			3123	1,392,837	1,616	1,391,221	\$3,3600	Sec 20	\$4,679,932.32	\$448,459.18		3124	1,391,221	\$3,5400	Sec 20	\$4,924,922.34		
	Monthly Vol.			3170	1,395,489	1,618	1,393,871	\$3,3600	Sec 20	\$4,688,843.04	\$448,459.18		3171	1,393,871	\$3,5250	Sec 20	\$4,913,395.28		
	Monthly Vol.			3172	2,231,489	2,595	2,228,894	\$3,3600	Sec 20	\$7,497,803.04	\$717,532.90		3173	2,228,894	\$3,5200	Sec 20	\$7,845,706.88		
	Monthly Vol.			3181	697,341	809	696,532	\$3,3600	Sec 20	\$2,343,065.76	\$224,229.59		3182	696,532	\$3,5100	Sec 20	\$2,444,827.32		
March 2017	Monthly Vol.		7,905,000	3099	914,398	1,065	913,333	\$2,4950	Sec 20	\$2,281,423.01	\$297,903.04		3100	913,333	\$2,7000	Sec 20	\$2,465,999.10		
	Monthly Vol.			3121	616,189	712	615,477	\$2,5100	Sec 20	\$1,546,634.39	\$198,605.34		3122	615,477	\$2,7000	Sec 20	\$1,661,787.90		
	Monthly Vol.			3123	1,535,395	1,782	1,533,613	\$2,5100	Sec 20	\$3,853,841.45	\$496,508.38		3124	1,533,613	\$2,7100	Sec 20	\$4,156,091.23		
	Monthly Vol.			3170	1,540,423	1,787	1,538,636	\$2,5100	Sec 20	\$3,866,461.73	\$496,508.38		3171	1,538,636	\$2,6950	Sec 20	\$4,146,624.02		
	Monthly Vol.			3172	2,458,139	2,857	2,455,282	\$2,5100	Sec 20	\$6,169,928.89	\$794,411.42		3173	2,455,282	\$2,6800	Sec 20	\$6,604,708.58		
	Monthly Vol.			3181	768,168	894	767,274	\$2,5100	Sec 20	\$1,928,101.68	\$248,254.19		3182	767,274	\$2,6800	Sec 20	\$2,056,294.32		
July 2017	Monthly Vol.		3,100,000	3237	2,168,438	3,346	2,165,092	\$2,9100	Sec 20	\$6,310,154.58	\$694,845.30		3238	2,165,092	\$3,2050	Sec 20	\$6,939,119.86		
	Monthly Vol.			3239	929,369	1,425	927,944	\$2,9000	Sec 20	\$2,695,170.10	\$297,793.68		3240	927,944	\$3,1900	Sec 20	\$2,960,141.36		
August 2017	Monthly Vol.		3,100,000	3237	2,163,676	3,337	2,160,339	\$2,9300	Sec 20	\$6,339,570.68	\$662,822.18		3238	2,160,339	\$3,2250	Sec 20	\$6,967,093.28		
	Monthly Vol.			3239	927,220	1,423	925,797	\$2,9200	Sec 20	\$2,707,482.40	\$284,069.36		3240	925,797	\$3,2100	Sec 20	\$2,971,808.37		
	Monthly Vol.			3295	1,538,824	2,370	1,536,454	\$2,9600	Sec 20	\$4,554,919.04	\$473,445.77		3296	1,536,454	\$3,2100	Sec 20	\$4,932,017.34		
	Monthly Vol.			3297	1,236,388	1,914	1,234,474	\$2,9400	Sec 20	\$3,634,980.72	\$378,752.82		3298	1,234,474	\$3,2125	Sec 20	\$3,965,747.73		
	Monthly Vol.			3299	308,764	465	308,299	\$2,9500	Sec 20	\$910,853.80	\$94,692.95		3300	308,299	\$3,2175	Sec 20	\$991,952.03		

<b>Total</b>			46,155,000		45,894,605	56,563	45,838,042			\$145,876,124	\$12,825,607			45,838,042			\$152,119,941	\$6,581,790
<b>Grand Total (Spot and Baseload)</b>			48,020,000		47,655,485	59,318	47,596,167			\$151,618,317	\$13,324,434			47,596,167			\$157,545,041	\$7,397,711
<b>Unit price (Net)</b>																		\$0.16

Net Baseload Cost ( \$/Dth) => \$ 0.14

Net Spot & Baseload Cost ( \$/Dth) => \$0.16

**ATTACHMENT C**

**Advice No. 5193**

**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>
9/26/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.0500	\$3.3550	Sec 15 (b) Low	\$2.9900	\$2.6910
10/13/2016	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	\$3.0000	\$2.7000
10/15/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.7850	\$3.0635	Sec 15 (b) Low	\$2.6400	\$2.3760
10/17/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.7850	\$3.0635	Sec 15 (b) Low	\$2.6400	\$2.3760
10/19/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9800	\$3.2780	Sec 15 (b) Low	\$3.1200	\$2.8080
10/20/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.1000	\$3.4100	Sec 15 (b) Low	\$3.2400	\$2.9160
10/21/2016	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	\$3.1500	\$2.8350
11/9/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.2200	\$2.4420	Sec 15 (b) Low	\$2.4100	\$2.1690
11/14/2016	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	\$1.9500	\$1.7550
11/30/2016	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.1700	\$3.4870	Sec 15 (b) Low	\$3.2500	\$2.9250
1/24/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.2900	\$3.6190	Sec 15 (b) Low	\$3.6400	\$3.2760
1/27/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.4700	\$3.8170	Sec 15 (b) Low	\$3.6400	\$3.2760
6/19/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9500	\$3.2450	Sec 15 (b) Low	\$3.1700	\$2.8530
6/25/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.6600	\$2.9260	Sec 15 (b) Low	\$2.9700	\$2.6730



6/26/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.6600	\$2.9260	Sec 15 (b) Low	\$2.9700	\$2.6730
7/5/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.6000	\$2.8600	Sec 15 (b) Low	\$2.6000	\$2.3400
7/6/2017	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	\$3.3000	\$2.9700
7/9/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9200	\$3.2120	Sec 15 (b) Low	\$3.2000	\$2.8800
7/10/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9200	\$3.2120	Sec 15 (b) Low	\$3.2000	\$2.8800
7/11/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.9500	\$3.2450	Sec 15 (b) Low	\$3.2000	\$2.8800
7/14/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8000	\$3.0800	Sec 15 (b) Low	\$3.0950	\$2.7855
7/15/2017	Sec 15 (a) Wtd Avg	\$2.8054	\$3.0859	Sec 15 (a) Wtd Avg	\$3.1618	\$2.8456
	Sec 15 (b) High	\$2.9000	\$3.1900	Sec 15 (b) Low	\$3.1400	\$2.8260
7/16/2017	Sec 15 (a) Wtd Avg	\$2.8054	\$3.0859	Sec 15 (a) Wtd Avg	\$3.1618	\$2.8456
	Sec 15 (b) High	\$2.9000	\$3.1900	Sec 15 (b) Low	\$3.1400	\$2.8260
7/17/2017	Sec 15 (a) Wtd Avg	\$2.8054	\$3.0859	Sec 15 (a) Wtd Avg	\$3.1618	\$2.8456
	Sec 15 (b) High	\$2.9000	\$3.1900	Sec 15 (b) Low	\$3.1400	\$2.8260
7/19/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8700	\$3.1570	Sec 15 (b) Low	\$3.1400	\$2.8260
7/20/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8800	\$3.1680	Sec 15 (b) Low	\$3.1500	\$2.8350
7/24/2017	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	\$3.0000	\$2.7000
7/31/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$2.8100	\$3.0910	Sec 15 (b) Low	\$3.0800	\$2.7720
8/29/2017	Sec 15 (a) Wtd Avg		\$0.0000	Sec 15 (a) Wtd Avg		\$0.0000
	Sec 15 (b) High	\$3.9000	\$4.2900	Sec 15 (b) Low	\$3.7150	\$3.3435

8/31/2017	Sec 15 (a) Wtd Avg	\$0.0000	Sec 15 (a) Wtd Avg	\$0.0000
	Sec 15 (b) High	\$0.0000	Sec 15 (b) Low	\$4.2000 \$3.7800

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. 5193**

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



## **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:** 105,000 Dth

**Flow Date(s) Requested:** September 26, 2016

**Time of Request:** 7:43:00 pm September 25, 2016

**Reason for Request:** Southern System scheduled quantities 101,637 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:** October 13, 2016

**Time of Request:** 7:25:00 pm October 12, 2016

**Reason for Request:** Southern System scheduled quantities 41,000 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:** 36,000 Dth

**Flow Date(s) Requested:** October 15, 2016

**Time of Request:** 7:15:00 pm October 14, 2016

**Reason for Request:** Southern System scheduled quantities 36,000 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:** 75,000 Dth

**Flow Date(s) Requested:** October 17, 2016

**Time of Request:** 7:30:00 pm October 16, 2016

**Reason for Request:** Southern System scheduled quantities 75,000 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:** 81,000 Dth

**Flow Date(s) Requested:** October 19, 2016

**Time of Request:** 7:30:00 pm October 18, 2016

**Reason for Request:** Southern System scheduled quantities 81,000 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:** 46,000 Dth

**Flow Date(s) Requested:** October 20, 2016

**Time of Request:** 7:30:00 pm October 19, 2016

**Reason for Request:** Southern System scheduled quantities 46,000 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:** October 21, 2016

**Time of Request:** 8:00:00 pm October 20, 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:** 20,000 Dth

**Flow Date(s) Requested:** November 9, 2016

**Time of Request:** 8:05:00 pm November 8, 2016

**Reason for Request:** Southern System scheduled quantities 20,000 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:** 88,000 Dth

**Flow Date(s) Requested:** November 14, 2016

**Time of Request:** 7:30:00 pm November 13, 2016

**Reason for Request:** Southern System scheduled quantities are 88,000 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:** 70,000 Dth

**Flow Date(s) Requested:** November 30, 2016

**Time of Request:** 8:32:00 pm November 29, 2016

**Reason for Request:** Southern System scheduled quantities are 69,583 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:** 45,000 Dth

**Flow Date(s) Requested:** January 24, 2017

**Time of Request:** 11:37:00 am January 24, 2017

**Reason for Request:** Southern System scheduled quantities are 45,000 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:** 50,000 Dth

**Flow Date(s) Requested:** January 27, 2017

**Time of Request:** 07:56:00 pam January 26, 2017

**Reason for Request:** Southern System scheduled quantities are 50,000 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:** 95,000 Dth

**Flow Date(s) Requested:** June 19, 2017

**Time of Request:** 21:45:00 pm June 18, 2017

**Reason for Request:** Southern System scheduled quantities are 95,000 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:** 60,000 Dth

**Flow Date(s) Requested:** June 25, 2017

**Time of Request:** 20:15:00 pm June 24, 2017

**Reason for Request:** Southern System scheduled quantities are 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 for system reliability.

**Location:** Southern System (Ehrenberg)

**Quantity Requested:** 100,000 Dth

**Flow Date(s) Requested:** June 26, 2017

**Time of Request:** 20:30:00 pm June 25, 2017

**Reason for Request:** Southern System scheduled quantities are 100,000 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:** 80,000 Dth

**Flow Date(s) Requested:** July 05, 2017

**Time of Request:** 21:00:00 pm July 04, 2017

**Reason for Request:** Southern System scheduled quantities are 80,000 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:** 87,000 Dth

**Flow Date(s) Requested:** July 6, 2017

**Time of Request:** 20:10:00 pm July 5, 2017

**Reason for Request:** Southern System scheduled quantities are 87,000 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:** 64,000 Dth

**Flow Date(s) Requested:** July 9, 2017

**Time of Request:** 19:40:00 pm July 8, 2017

**Reason for Request:** Southern System scheduled quantities are 64,000 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:** 40,000 Dth

**Flow Date(s) Requested:** July 10, 2017

**Time of Request:** 10:28:00 pm July 9, 2017

**Reason for Request:** Southern System scheduled quantities are 40,000 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:** 30,000 Dth

**Flow Date(s) Requested:** July 11, 2017

**Time of Request:** 20:40:00 pm July 10, 2017

**Reason for Request:** Southern System scheduled quantities are 30,000 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:** 66,000 Dth

**Flow Date(s) Requested:** July 14, 2017

**Time of Request:** 20:50:00 pm July 13, 2017

**Reason for Request:** Southern System scheduled quantities are 66,000 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:** 50,000 Dth

**Flow Date(s) Requested:** July 15, 2017

**Time of Request:** 1:50:00 pm July 14, 2017

**Reason for Request:** Southern System scheduled quantities are 50,000 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:** 50,000 Dth

**Flow Date(s) Requested:** July 16, 2017

**Time of Request:** 1:50:00 pm July 14, 2017

**Reason for Request:** Southern System scheduled quantities are 50,000 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:** 77,000 Dth

**Flow Date(s) Requested:** July 17, 2017

**Time of Request:** 20:25:00 pm July 16, 2017

**Reason for Request:** Southern System scheduled quantities are 77,000 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:** 50,000 Dth

**Flow Date(s) Requested:** July 19, 2017

**Time of Request:** 20:40:00 pm July 18, 2017

**Reason for Request:** Southern System scheduled quantities are 50,000 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:** 70,000 Dth

**Flow Date(s) Requested:** July 20, 2017

**Time of Request:** 21:12:00 July 19, 2017

**Reason for Request:** Southern System scheduled quantities are 70,000 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:** 20,000 Dth

**Flow Date(s) Requested:** July 24, 2017

**Time of Request:** 20:33:00 July 23, 2017

**Reason for Request:** Southern System scheduled quantities are 17,000 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:** 80,000 Dth

**Flow Date(s) Requested:** July 31, 2017

**Time of Request:** 20:00:00 July 30, 2017

**Reason for Request:** Southern System scheduled quantities are 80,000 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:** 96,000 Dth

**Flow Date(s) Requested:** August 29, 2017

**Time of Request:** 19:55:00 August 28, 2017

**Reason for Request:** Southern System scheduled quantities are 96,000 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:** 40,000 Dth

**Flow Date(s) Requested:** August 29, 2017 (C4)

**Time of Request:** 11:30:00 August 29, 2017

**Reason for Request:** Southern System scheduled quantities are 76,000 Dth below the southern system minimum flowing supply requirement.

**ATTACHMENT E**

**Advice No. 5193**

**Baseload Index Prices – NGI Bidweek Average**

**CONFIDENTIAL AND PROTECTED MATERIALS PURSUANT  
TO PUC SECTION 583, GO 66-C, AND D.16-08-024**

**ATTACHMENT F**

**Advice No. 5193**

**CALCULATION OF SPOT PURCHASES IN THE ABSENCE OF WINTER BASELOAD  
CONTRACTS**

		SSR Base Purchases		
		Aug-16 to Sep-16	Dec-16 to Mar-17	Total
Base:	Baseload (MMDth)	12.2	30.6	42.8
	Net Cost (\$Millions)	\$2.1	\$5.2	\$7.37
	Average Net cost (\$/Dth)	\$0.177	\$0.171	\$0.172
Spot:	Additional Spot Purchases required in absence of Baseload (MMDth)	7.5	4.5	12.0
	Net Cost (\$Millions)	\$3.1	\$1.9	\$5.04
	Average Net cost (\$/Dth)	\$0.419	\$0.422	\$0.420

Net Benefit/(Cost) (2.3)

2016-17			
	Aug-March Volume (MMDth)	Net Cost (\$Millions)	Average Net Cost (\$/Dth)
Baseload	42.8	\$7.37	\$0.17
Additional Spot Purchases Needed in Absence of Baseload	12.0	\$5.04	\$0.42
Net Benefit/(Cost)		<u>(2.33)</u>	

Net Scheduled from Pipelines (Gross Deliveries - Inkind Fuel)

Net Scheduled to Blythe :

SSR Baseload Analysis for : 2016 Summer Season (Aug-Sep)

Flow Date	(A)		(B)		Deliveries Over/Under Requirement	Filter	Ehrenberg Index (\$)	Ehrenberg Purchase Price (Spot Index X 1.100)	Full BTS Transport Charge	SCG CityGate Index (\$)	City Gate Sales Price (Spot Index X 0.995)	Spot Purchase Cost [Blythe\$+BTS X DeliveryReq (w/Fuel)]	Daily Sales Price	Net Spot Cost
	(A)		(B)											
	Actual HUB Delivery	Total Daily Core NonCore Customer Delivery	Southern System Minimum Requirement	3rd Cycle										
Mon-8/1/16	190,795	487,834	684,596	-	(196,762)	X	3,0040	3,3044	0.15528	3,0158	3,0007	(\$681,299)	590,428	(\$90,871)
Tue-8/2/16	192,816	478,526	638,556	-	(160,030)	X	2,8961	3,1857	0.15528	2,9210	2,9064	(\$535,101)	465,110	(\$69,991)
Wed-8/3/16	193,070	503,023	699,609	23,979	(196,586)	X	2,8244	3,1068	0.15528	2,8585	2,8442	(\$641,818)	559,131	(\$82,687)
Thu-8/4/16	199,827	479,523	700,610	-	(221,087)	X	2,7702	3,0472	0.15528	2,7880	2,7741	(\$708,619)	613,309	(\$95,311)
Fri-8/5/16	199,827	463,296	696,606	-	(233,310)	X	2,8955	3,1851	0.15528	2,8809	2,8665	(\$779,979)	668,782	(\$111,197)
Sat-8/6/16	199,827	460,396	516,449	-	(56,053)	X	2,7502	3,0252	0.15528	2,7371	2,7234	(\$178,425)	152,656	(\$25,769)
Sun-8/7/16	199,826	467,285	520,453	-	(53,168)	X	2,7502	3,0252	0.15528	2,7371	2,7234	(\$169,240)	144,799	(\$24,441)
Mon-8/8/16	199,818	482,229	574,500	-	(92,271)	X	2,7502	3,0252	0.15528	2,7371	2,7234	(\$299,710)	251,292	(\$42,418)
Tue-8/9/16	191,834	463,791	598,521	-	(134,730)	X	2,9137	3,2051	0.15528	2,9149	2,9003	(\$453,115)	390,761	(\$62,354)
Wed-8/10/16	199,827	463,311	599,522	-	(136,211)	X	2,7584	3,0342	0.15528	2,7657	2,7519	(\$434,809)	374,835	(\$59,974)
Thu-8/11/16	199,827	474,401	601,523	-	(127,122)	X	2,7129	2,9842	0.15528	2,7446	2,7309	(\$399,427)	347,155	(\$52,272)
Fri-8/12/16	199,827	490,500	602,524	-	(112,024)	X	2,6653	2,9318	0.15528	2,7049	2,6914	(\$346,118)	301,499	(\$44,619)
Sat-8/13/16	199,824	487,378	656,571	-	(169,193)	X	2,9900	3,2890	0.15528	3,0093	2,9943	(\$583,232)	506,607	(\$76,625)
Sun-8/14/16	199,826	497,369	672,585	-	(175,216)	X	2,9900	3,2890	0.15528	3,0093	2,9943	(\$603,996)	524,641	(\$79,355)
Mon-8/15/16	199,810	527,630	778,677	40,729	(251,047)	X	2,9900	3,2890	0.15528	3,0093	2,9943	(\$865,396)	751,698	(\$113,698)
Tue-8/16/16	199,827	693,760	745,649	-	(51,889)	X	3,5575	3,9133	0.15528	3,5463	3,5286	(\$211,288)	183,094	(\$28,194)
Wed-8/17/16	199,827	634,961	747,650	-	(112,689)	X	3,1220	3,4342	0.15528	3,4018	3,3848	(\$404,831)	381,429	(\$23,403)
Thu-8/18/16	199,808	674,474	780,679	-	(106,205)	X	2,8957	3,1853	0.15528	3,0741	3,0587	(\$355,076)	324,852	(\$30,224)
Fri-8/19/16	199,827	560,601	766,667	38,966	(206,066)	X	2,7342	3,0076	0.15528	2,7924	2,7784	(\$652,305)	572,542	(\$79,763)
Sat-8/20/16	199,825	482,376	622,542	-	(140,166)	X	2,5725	2,8298	0.15528	2,6255	2,6124	(\$418,745)	366,166	(\$52,579)
Sun-8/21/16	197,303	486,018	610,531	-	(124,513)	X	2,5725	2,8298	0.15528	2,6255	2,6124	(\$371,981)	325,274	(\$46,706)
Mon-8/22/16	199,826	533,023	700,610	13,988	(167,587)	X	2,5725	2,8298	0.15528	2,6255	2,6124	(\$500,665)	437,800	(\$62,866)
Tue-8/23/16	199,827	506,439	641,558	-	(135,119)	X	2,9077	3,1985	0.15528	2,9273	2,9127	(\$453,533)	393,556	(\$59,977)
Wed-8/24/16	199,358	469,417	640,557	-	(171,140)	X	2,7657	3,0423	0.15528	2,7662	2,7524	(\$447,682)	471,040	(\$76,642)
Thu-8/25/16	199,826	487,485	642,559	-	(155,074)	X	2,7680	3,0448	0.15528	2,7845	2,7706	(\$496,660)	429,645	(\$67,016)
Fri-8/26/16	199,827	524,876	628,547	-	(103,671)	X	2,7676	3,0444	0.15528	2,8022	2,7882	(\$331,984)	289,054	(\$42,930)
Sat-8/27/16	199,827	474,008	594,517	-	(120,509)	X	2,6987	2,9686	0.15528	2,6905	2,6770	(\$376,764)	322,608	(\$54,155)
Sun-8/28/16	199,827	491,103	605,527	-	(114,424)	X	2,6987	2,9686	0.15528	2,6905	2,6770	(\$357,740)	306,318	(\$51,422)
Mon-8/29/16	199,827	478,034	658,573	-	(180,539)	X	2,6987	2,9686	0.15528	2,6905	2,6770	(\$564,443)	483,311	(\$81,131)
Tue-8/30/16	199,826	560,705	644,561	-	(150,005)	X	2,9936	3,2903	0.15528	3,0802	3,0648	(\$251,205)	223,258	(\$57,233)
Wed-8/31/16	199,827	570,418	633,551	-	(72,846)	X	2,9912	3,2903	0.15528	3,0802	3,0648	(\$103,000)	92,137	(\$27,947)
Thu-9/1/16	199,827	529,739	601,523	-	(31,105)	X	2,8885	3,1224	0.18629	2,9770	2,9621	(\$109,000)	114,229	(\$10,863)
Fri-9/2/16	199,826	491,099	569,495	-	(39,756)	X	2,8124	3,0936	0.18629	2,8877	2,8733	(\$130,505)	243,255	(\$16,276)
Sat-9/3/16	199,827	501,091	583,508	-	(92,409)	X	2,6114	2,8725	0.18629	2,6456	2,6324	(\$282,893)	190,605	(\$39,638)
Sun-9/4/16	199,827	491,099	573,499	-	(72,408)	X	2,6114	2,8725	0.18629	2,6456	2,6324	(\$221,665)	243,255	(\$31,060)
Mon-9/5/16	199,827	499,290	598,521	-	(99,231)	X	2,6114	2,8725	0.18629	2,6456	2,6324	(\$303,778)	261,213	(\$42,565)
Tue-9/6/16	199,827	518,413	609,530	-	(91,117)	X	2,6114	2,8725	0.18629	2,6456	2,6324	(\$278,938)	239,854	(\$39,085)
Wed-9/7/16	199,827	554,115	655,570	-	(101,455)	X	2,7232	2,9955	0.18629	2,9026	2,8881	(\$323,074)	293,011	(\$30,063)
Thu-9/8/16	197,529	550,553	672,585	-	(122,032)	X	2,6781	2,9459	0.18629	2,7758	2,7619	(\$382,541)	337,043	(\$45,498)
Fri-9/9/16	199,827	575,513	650,566	-	(75,053)	X	2,6920	2,9612	0.18629	2,7700	2,7562	(\$236,421)	206,857	(\$29,564)
Sat-9/10/16	199,689	464,805	537,468	-	(72,663)	X	2,7035	2,9739	0.18629	2,7220	2,7084	(\$239,813)	196,800	(\$33,013)
Sun-9/11/16	199,689	503,342	537,468	-	(34,122)	X	2,7035	2,9739	0.18629	2,7220	2,7084	(\$107,932)	92,427	(\$15,506)
Mon-9/12/16	198,425	460,744	572,498	-	(111,754)	X	2,7035	2,9739	0.18629	2,7220	2,7084	(\$353,447)	302,673	(\$50,773)
Tue-9/13/16	199,818	544,831	565,492	-	(20,661)	X	2,8421	3,1263	0.18629	2,8797	2,8653	(\$68,498)	59,200	(\$9,298)
Wed-9/14/16	199,827	489,754	571,497	-	(81,743)	X	2,8854	3,1739	0.18629	2,9202	2,9056	(\$274,901)	237,512	(\$37,388)
Thu-9/15/16	199,827	547,239	578,503	-	(31,264)	X	2,9367	3,2304	0.18629	2,9468	2,9321	(\$106,906)	91,668	(\$15,238)
Fri-9/16/16	199,827	504,950	579,504	-	(74,554)	X	2,8230	3,1053	0.18629	2,8703	2,8559	(\$245,603)	212,922	(\$32,681)

Net Scheduled from Pipelines (Gross Deliveries - Inkind Fuel)

Net Scheduled to Blythe :

(EHR-OTAY-NBP)

(A) (B) (A)-(B)

Flow Date	Actual HUB Delivery		Total Daily Core NonCore Customer Delivery	3rd Cycle		Deliveries Over/Under Requirement	Filter
	Baseload	Spot		Southern System Minimum Requirement	System Requirement		
Sat-9/17/16	199,827	-	484,487	558,486	(73,999)	X	
Sun-9/18/16	199,811	-	484,467	583,508	(99,041)	X	
Mon-9/19/16	199,825	-	500,251	693,603	(193,352)	X	
Tue-9/20/16	195,925	-	526,765	690,601	(163,836)	X	
Wed-9/21/16	199,818	-	509,371	648,564	(139,193)	X	
Thu-9/22/16	199,827	-	455,398	589,513	(134,115)	X	
Fri-9/23/16	199,827	-	536,652	572,498	(35,846)	X	
Sat-9/24/16	196,696	-	453,694	656,571	(202,877)	X	
Sun-9/25/16	199,823	-	513,973	709,617	(195,644)	X	
Mon-9/26/16	199,823	104,908	582,607	809,704	(227,097)	X	
Tue-9/27/16	199,827	-	685,998	832,724	(146,726)	X	
Wed-9/28/16	199,777	-	536,560	723,630	(187,070)	X	
Thu-9/29/16	199,677	-	612,696	685,596	(72,900)	X	
Fri-9/30/16	199,781	-	590,901	629,548	(38,647)	X	

>0

<0

Cuml. Customer Delivery

Season Total	12,144,300	222,570
Daily Avg		

Total Below So. Syst. Min :	61	61	out of 61 Days Cust Deliveries Under Req.
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All days were short without baseload purchases.

Actual Baseload Costs:

Baseload :	Amt(Dths)	inkind .087%	Net Amt flowed
Summer Total (Aug16-Sep17) :	12,154,817	10,517	12,144,300

SSR Baseload Analysis for : 2016 Summer Season (Aug-Sep)

Flow Date	Ehrenberg Index (\$)	Ehrenberg Purchase Price (Spot Index X 1.100)	Full BTS Transport Charge	SCG CityGate Index (\$)	City Gate Sales Price (Spot Index X 0.995)	Spot Purchase Cost [Blythe\$+BTS X DeliveryReq (w/Fuel)]	Daily Sales Price	Net Spot Cost
Sat-9/17/16	2,7364	3,0100	0.18629	2,7776	2,7637	(236,718)	204,512	(532,206)
Sun-9/18/16	2,7364	3,0100	0.18629	2,7776	2,7637	(316,827)	273,721	(43,106)
Mon-9/19/16	2,7364	3,0100	0.18629	2,7776	2,7637	(618,522)	534,369	(84,153)
Tue-9/20/16	2,9392	3,2331	0.18629	3,0266	3,0115	(560,685)	493,387	(67,298)
Wed-9/21/16	2,9530	3,2483	0.18629	3,0474	3,0322	(478,464)	422,056	(56,408)
Thu-9/22/16	3,0276	3,3304	0.18629	3,0888	3,0734	(472,025)	412,183	(60,842)
Fri-9/23/16	3,0378	3,3416	0.18629	3,0448	3,0296	(126,564)	108,598	(17,965)
Sat-9/24/16	2,9787	3,2766	0.18629	3,0549	3,0396	(703,115)	616,670	(86,444)
Sun-9/25/16	2,9787	3,2766	0.18629	3,0549	3,0396	(678,045)	594,684	(83,360)
Mon-9/26/16	2,9787	3,2766	0.18629	3,0549	3,0396	(787,054)	690,290	(96,764)
Tue-9/27/16	3,0546	3,3601	0.18629	3,2370	3,2208	(520,772)	472,577	(48,195)
Wed-9/28/16	2,9506	3,2457	0.18629	3,0814	3,0660	(642,544)	573,555	(68,989)
Thu-9/29/16	2,8406	3,1247	0.18629	2,9877	2,9728	(241,565)	216,714	(24,851)
Fri-9/30/16	2,7723	3,0495	0.18629	2,9217	2,9071	(125,158)	112,350	(12,808)

Purchases

Sales

Net Cost

Season Total	\$ (24,644,842)	\$ 21,510,175	\$ (3,134,666)
Daily Avg			

Sales Differential

\$ (3,134,666)

Implied Incremental Purchase Cost without 200k Baseload in place :

Summer Total :	Amt(Dths)	\$PurchaseAmt	\$SaleAmt	Net Cost
	12,141,456	(36,457,475)	34,308,568	(2,148,908)

Sales Differential \$/dth

\$ (2,148,908)

Actual Incremental Purchase Cost with 200k Baseload :

\$ 0.177

(Cost)/Benefit : \$ 985,758

Net Scheduled from Pipelines (Gross Deliveries - Inkind Fuel)

SSR Baseload Analysis for : 2016-17 Winter Season

Net Scheduled to Blythe : (EHR-OTAY-NBP)		(A)		(B)		(A)-(B)		Filter	Deliveries (Excl Baseload) Over/Under Requirement	Spot Purchase Cost [Blythe+HTS X DeliveryReq (w/Fuel)]	Daily Sales Price	Net Spot Cost
Flow Date	Spot	Total Core, Noncore, & Spot Purch (Excluding Baseload)	Southern System Minimum Requirement	Ehrenberg Index (\$)	Ehrenberg Purchase Price (Spot Index X 1.100)	BTS Transport Charge	SCG CityGate Index (\$)					
Sat-12/3/16	254,700	645,638	666,787	\$ 3,3104	\$ 3,6414	0.18629	\$ 3,4052	\$ 3,3882	(\$1,044)	\$ 71,656	(\$9,387)	
Sun-12/4/16	254,700	658,064	683,807	\$ 3,3104	\$ 3,6414	0.18629	\$ 3,4052	\$ 3,3882	(\$96,646)	\$ 87,222	(\$11,425)	
Mon-12/5/16	254,700	713,044	751,887	\$ 3,3104	\$ 3,6414	0.18629	\$ 3,4052	\$ 3,3882	(\$148,848)	\$ 131,607	(\$17,241)	
Wed-12/7/16	254,699	752,076	775,916	\$ 3,8068	\$ 4,1875	0.18629	\$ 3,8110	\$ 3,7919	(\$104,388)	\$ 90,400	(\$13,988)	
Thu-12/8/16	254,679	712,417	808,955	\$ 3,7358	\$ 4,1094	0.18629	\$ 3,8387	\$ 3,8195	(\$415,164)	\$ 368,728	(\$46,436)	
Fri-12/9/16	254,700	733,772	779,920	\$ 3,5950	\$ 3,9545	0.18629	\$ 3,7010	\$ 3,6825	(\$191,307)	\$ 169,940	(\$21,367)	
Thu-12/15/16	254,700	739,051	799,944	\$ 3,4875	\$ 3,8363	0.18629	\$ 3,6640	\$ 3,6457	(\$245,221)	\$ 221,996	(\$23,224)	
Fri-12/16/16	254,700	768,980	798,943	\$ 3,5447	\$ 3,8992	0.18629	\$ 3,7120	\$ 3,6934	(\$12,549)	\$ 110,667	(\$11,883)	
Sat-12/17/16	254,700	677,756	756,893	\$ 3,8203	\$ 4,2023	0.18629	\$ 3,9160	\$ 3,8964	(\$347,693)	\$ 308,351	(\$39,342)	
Sun-12/18/16	241,745	599,642	758,895	\$ 3,8203	\$ 4,2023	0.18629	\$ 3,9160	\$ 3,8964	(\$699,691)	\$ 620,517	(\$79,174)	
Mon-12/19/16	254,700	667,980	796,940	\$ 3,8203	\$ 4,2023	0.18629	\$ 3,9160	\$ 3,8964	(\$566,595)	\$ 502,482	(\$64,113)	
Tue-12/20/16	254,700	761,777	795,939	\$ 3,6772	\$ 4,0449	0.18629	\$ 3,8411	\$ 3,8219	(\$144,708)	\$ 130,564	(\$14,145)	
Tue-12/27/16	249,664	780,814	814,962	\$ 3,5605	\$ 3,9166	0.18629	\$ 3,7404	\$ 3,7217	(\$140,260)	\$ 127,089	(\$13,172)	
Fri-12/30/16	254,700	722,474	722,853	\$ 3,5792	\$ 3,9371	0.18629	\$ 3,6459	\$ 3,6277	(\$1,563)	\$ 1,375	(\$188)	
Sat-12/31/16	254,700	719,111	766,905	\$ 3,5792	\$ 3,9371	0.18629	\$ 3,6459	\$ 3,6277	(\$197,295)	\$ 173,381	(\$23,914)	
Tue-1/3/17	253,458	778,912	848,985	\$ 3,7741	\$ 4,1515	0.32070	\$ 4,0598	\$ 4,0395	(\$313,717)	\$ 283,060	(\$30,657)	
Fri-1/6/17	254,689	693,772	715,830	\$ 3,3054	\$ 3,6359	0.32070	\$ 3,4669	\$ 3,4496	(\$87,370)	\$ 76,091	(\$11,280)	
Sat-1/7/17	237,999	515,417	663,770	\$ 3,1699	\$ 3,4869	0.32070	\$ 3,3438	\$ 3,3271	(\$565,467)	\$ 493,582	(\$71,885)	
Sun-1/8/17	246,460	570,889	659,765	\$ 3,1699	\$ 3,4869	0.32070	\$ 3,3438	\$ 3,3271	(\$338,763)	\$ 295,698	(\$43,065)	
Mon-1/9/17	254,704	691,676	759,881	\$ 3,1699	\$ 3,4869	0.32070	\$ 3,3438	\$ 3,3271	(\$259,972)	\$ 226,924	(\$33,049)	
Thu-1/12/17	252,922	680,556	741,861	\$ 3,2683	\$ 3,5951	0.32070	\$ 3,5004	\$ 3,4829	(\$240,315)	\$ 213,519	(\$26,796)	
Fri-1/13/17	254,704	753,900	810,941	\$ 3,4299	\$ 3,7729	0.32070	\$ 3,6728	\$ 3,6544	(\$23,751)	\$ 208,453	(\$25,299)	
Tue-1/17/17	254,267	717,083	730,848	\$ 3,3923	\$ 3,7315	0.32070	\$ 3,6242	\$ 3,6061	(\$55,839)	\$ 49,638	(\$6,201)	
Sat-1/21/17	254,576	684,326	705,819	\$ 3,1547	\$ 3,4702	0.32070	\$ 3,4554	\$ 3,4381	(\$81,564)	\$ 73,896	(\$7,668)	
Sun-1/22/17	254,704	718,218	719,835	\$ 3,1547	\$ 3,4702	0.32070	\$ 3,4554	\$ 3,4381	(\$6,137)	\$ 5,559	(\$577)	
Mon-1/23/17	254,704	726,432	885,027	\$ 3,1547	\$ 3,4702	0.32070	\$ 3,4554	\$ 3,4381	(\$601,852)	\$ 545,269	(\$56,585)	
Tue-1/24/17	223,724	678,824	812,943	\$ 3,2777	\$ 3,6055	0.32070	\$ 3,6594	\$ 3,6411	(\$527,136)	\$ 488,341	(\$38,792)	
Wed-1/25/17	254,704	774,381	928,077	\$ 3,4353	\$ 3,7788	0.32070	\$ 3,7553	\$ 3,7365	(\$630,754)	\$ 574,289	(\$56,465)	
Thu-1/26/17	254,701	722,625	922,070	\$ 3,4441	\$ 3,7885	0.32070	\$ 3,6591	\$ 3,6408	(\$820,440)	\$ 726,140	(\$94,300)	
Fri-1/27/17	254,704	692,885	903,048	\$ 3,4596	\$ 3,8056	0.32070	\$ 3,6863	\$ 3,6679	(\$868,116)	\$ 770,850	(\$97,265)	
Sat-1/28/17	253,063	533,356	754,876	\$ 3,2087	\$ 3,5296	0.32070	\$ 3,3710	\$ 3,3541	(\$853,819)	\$ 743,010	(\$110,809)	
Sun-1/29/17	254,688	528,547	706,820	\$ 3,2087	\$ 3,5296	0.32070	\$ 3,3710	\$ 3,3541	(\$687,130)	\$ 597,953	(\$89,176)	
Mon-1/30/17	254,385	572,967	769,893	\$ 3,2087	\$ 3,5296	0.32070	\$ 3,3710	\$ 3,3541	(\$759,027)	\$ 660,518	(\$98,508)	
Tue-1/31/17	254,704	683,311	796,924	\$ 3,1237	\$ 3,4361	0.32070	\$ 3,4914	\$ 3,4739	(\$427,271)	\$ 394,685	(\$32,586)	
Mon-2/6/17	254,704	737,625	760,883	\$ 2,8395	\$ 3,1235	0.32070	\$ 3,0056	\$ 2,9906	(\$80,188)	\$ 69,555	(\$10,634)	
Thu-2/9/17	253,654	596,286	697,809	\$ 2,8511	\$ 3,1362	0.32070	\$ 3,0617	\$ 3,0464	(\$35,326)	\$ 309,279	(\$42,047)	
Fri-2/17/17	254,704	685,309	705,819	\$ 2,7050	\$ 2,9755	0.32070	\$ 3,0206	\$ 3,0055	(\$67,676)	\$ 61,643	(\$6,034)	
Sat-2/18/17	254,704	683,769	711,826	\$ 2,5830	\$ 2,8413	0.32070	\$ 2,9314	\$ 2,9167	(\$88,810)	\$ 81,835	(\$6,975)	
Sun-2/19/17	254,703	683,767	687,798	\$ 2,5830	\$ 2,8413	0.32070	\$ 2,9314	\$ 2,9167	(\$12,760)	\$ 11,757	(\$1,003)	
Thu-2/23/17	250,124	664,273	697,809	\$ 2,4568	\$ 2,7023	0.32070	\$ 2,8219	\$ 2,8078	(\$101,483)	\$ 94,162	(\$7,321)	
Fri-2/24/17	254,610	659,267	757,879	\$ 2,5108	\$ 2,7619	0.32070	\$ 2,8746	\$ 2,8602	(\$304,297)	\$ 282,053	(\$22,244)	
Fri-3/3/17	254,704	624,710	653,758	\$ 2,4742	\$ 2,7216	0.32070	\$ 2,7725	\$ 2,7586	(\$88,466)	\$ 80,133	(\$8,333)	
Sun-3/5/17	253,902	629,227	638,741	\$ 2,4557	\$ 2,7013	0.32070	\$ 2,7351	\$ 2,7214	(\$28,781)	\$ 25,892	(\$2,889)	
Mon-3/6/17	254,704	609,889	637,740	\$ 2,4557	\$ 2,7013	0.32070	\$ 2,7351	\$ 2,7214	(\$84,251)	\$ 75,794	(\$8,457)	
Wed-3/8/17	254,704	489,749	639,742	\$ 2,4719	\$ 2,7191	0.32070	\$ 2,8110	\$ 2,7969	(\$456,420)	\$ 419,522	(\$36,898)	
Thu-3/9/17	254,704	505,793	634,736	\$ 2,6015	\$ 2,8617	0.32070	\$ 2,8982	\$ 2,8837	(\$410,771)	\$ 371,834	(\$38,937)	

Net Scheduled from Pipelines (Gross Deliveries - Inkind Fuel)

SSR Baseload Analysis for : 2016-17 Winter Season

Net Scheduled to Blythe : (EHR-OTAY-NBP) (A) (B) (A)-(B)

Flow Date	HUB		Spot	Total Core, Noncore, & Spot Purch (Excluding Baseload)	3rd Cycle	Southern System Minimum Requirement	Deliveries (Excl Baseload) Over/Under Requirement	Filter	Ehrenberg Index (\$)	Ehrenberg Purchase Price (Spot Index X 1.100)	BTS Transport Charge	SCG CityGate Index (\$)	City Gate Sales Price (Spot Index X 0.995)	Spot Purchase Cost [Blythe\$+BTS X DeliveryReq (w/Fuel)]	Daily Sales Price	Net Spot Cost
	Baseload	Spot														
Fri-3/10/17	253,111	-	553,959	639,742	(85,783)	X	\$ 2,6951	\$ 2,9646	0.32070	\$ 2,9145	\$ 2,8999	\$ 248,764	(\$33,356)			
Sat-3/11/17	252,741	-	472,780	495,575	(22,795)	X	\$ 2,6999	\$ 2,9699	0.32070	\$ 2,6504	\$ 2,6371	\$ 60,114	(\$14,972)			
Sun-3/12/17	254,703	-	473,732	542,629	(68,897)	X	\$ 2,6999	\$ 2,9699	0.32070	\$ 2,6504	\$ 2,6371	\$ 181,692	(\$45,258)			
Mon-3/13/17	254,703	-	482,457	603,700	(121,243)	X	\$ 2,6999	\$ 2,9699	0.32070	\$ 2,6504	\$ 2,6371	\$ 319,736	(\$79,644)			
Tue-3/14/17	254,702	-	550,050	625,726	(75,676)	X	\$ 2,8204	\$ 3,1024	0.32070	\$ 3,0953	\$ 3,0798	\$ 233,069	(\$26,254)			
Wed-3/15/17	254,704	-	520,673	624,725	(104,052)	X	\$ 2,7617	\$ 3,0379	0.32070	\$ 2,8498	\$ 2,8356	\$ 295,045	(\$54,789)			
Thu-3/16/17	254,704	-	556,343	623,724	(67,381)	X	\$ 2,6443	\$ 2,9087	0.32070	\$ 2,9340	\$ 2,9193	\$ 196,707	(\$21,122)			
Fri-3/17/17	253,960	-	611,837	632,734	(20,897)	X	\$ 2,5126	\$ 2,7639	0.32070	\$ 2,7675	\$ 2,7537	\$ 57,543	(\$6,981)			
Sat-3/18/17	243,199	-	467,199	495,575	(28,376)	X	\$ 2,5110	\$ 2,7621	0.32070	\$ 2,7653	\$ 2,7515	\$ 78,076	(\$9,493)			
Sun-3/19/17	248,428	-	487,907	521,605	(33,698)	X	\$ 2,5110	\$ 2,7621	0.32070	\$ 2,7653	\$ 2,7515	\$ 92,719	(\$11,273)			
Mon-3/20/17	254,081	-	559,838	609,707	(49,869)	X	\$ 2,5110	\$ 2,7621	0.32070	\$ 2,7653	\$ 2,7515	\$ 137,213	(\$16,683)			
Wed-3/22/17	254,690	-	569,448	572,664	(3,216)	X	\$ 2,7647	\$ 3,0412	0.32070	\$ 3,0866	\$ 3,0712	\$ 9,877	(\$947)			
Thu-3/23/17	248,305	-	596,817	610,708	(13,891)	X	\$ 2,7111	\$ 2,9822	0.32070	\$ 3,0676	\$ 3,0523	\$ 42,399	(\$3,529)			
Fri-3/24/17	254,704	-	562,365	589,684	(27,319)	X	\$ 2,6874	\$ 2,9561	0.32070	\$ 3,0077	\$ 2,9927	\$ 81,757	(\$7,858)			
Wed-3/29/17	254,698	-	478,178	608,706	(130,528)	X	\$ 2,6510	\$ 2,9161	0.32070	\$ 2,9307	\$ 2,9160	\$ 380,626	(\$42,311)			
Thu-3/30/17	248,148	-	482,460	527,612	(45,152)	X	\$ 2,7345	\$ 3,0080	0.32070	\$ 3,0149	\$ 2,9998	\$ 135,448	(\$15,003)			

Season Total	30,596,134	94,890	Cuml. Customer Delivery Total Below So. Syst. Min :	<0	(4,518,509)	Dth	63	out of 121 Days Cust Deliveries Under Req.
	>0						52%	of days were short without baseload purchases.
Purchases	\$ (16,956,013)	\$ 15,047,562	Net Cost	\$	0,422	\$/dth		
			Sales	\$				Sales Differential
			Net Cost	\$	(1,908,450)			\$ (1,908,450)

Implied Incremental Purchase Cost without 250k Baseload in place :

Winter Total :	30,596,134	\$ (110,439,964)	\$SaleAmt	\$ 105,215,098	Net Cost	\$ (5,224,865)
			Amt(Dths)			Sales Differential
						\$ (5,224,865)

Actual Baseload Costs:

Winter Total (Dec16-Mar17) :	30,533,236	in kind	37,102	Net Amt flowed	30,596,134

Actual Incremental Purchase Cost with 250k Baseload :

					\$	0.171

(Cost)/Benefit : \$ (3,316,415)



**ATTACHMENT G**

**Advice No. 5193**

**OVERNOMINATION EVENT INFORMATION ANALYSIS**

INPUT (SSR

Purchase

Days)

INPUT (SSR Purchase Days)	OFO Cycle	110% S. Min	Scheduled Receipts at Blythe Prior to OFO	Scheduled Receipts at Blythe On OFO Cycle	% Change in Receipts at Blythe	Net Scheduled Receipts Outside Blythe Prior to OFO	Net Scheduled Receipts Outside Blythe On OFO Cycle	% Change in Receipts Outside of Blythe
9/1/16	N							
9/2/16	Y	661,675	770,915	735,757	-4.6%	2,019,872	1,893,257	-6.3%
9/3/16	Y	586,810	730,199	711,428	-2.6%	1,810,458	1,516,078	-16.3%
9/4/16	N							
9/5/16	N							
9/6/16	N							
9/7/16	Y	734,064	785,146	785,532	0.0%	2,102,083	2,106,332	0.2%
9/8/16	Y	733,238	754,596	730,607	-3.2%	1,874,860	1,815,662	-3.2%
9/9/16	N							
9/10/16	Y	647,363	776,014	644,932	-16.9%	1,735,900	1,564,186	-9.9%
9/11/16	N							
9/12/16	N							
9/13/16	N							
9/14/16	N							
9/15/16	N							
9/16/16	N							
9/17/16	Y	597,820	705,389	675,608	-4.2%	1,827,951	1,584,797	-13.3%
9/18/16	N							
9/19/16	N							
9/20/16	N							
9/21/16	N							
9/22/16	Y	648,464	685,004	655,794	-4.3%	1,864,429	1,667,282	-10.6%
9/23/16	N							
9/24/16	Y	722,228	694,103	690,946	-0.5%	1,858,501	1,739,879	-6.4%
9/25/16	N							
9/26/16	N							
9/27/16	N							
9/28/16	Y	750,853	886,595	700,616	-21.0%	2,202,844	1,949,236	-11.5%
9/29/16	N							
9/30/16	N							
10/13/16	N							
10/15/16	N							
10/17/16	N							
10/19/16	N							
10/20/16	N							
10/21/16	Y	791,834	734,412	631,368	-14.0%	2,087,794	1,982,264	-5.1%
11/9/16	Y	737,871	642,429	662,349	3.1%	2,191,561	2,019,899	-7.8%
11/14/16	N							
11/30/16	N							
12/1/16	N							



INPUT (SSR Purchase Days)	OFO Cycle	110% S. Min	Scheduled Receipts at Blythe Prior to OFO	Scheduled Receipts at Blythe On OFO Cycle	% Change in Receipts at Blythe	Net Scheduled Receipts Outside Blythe Prior to OFO	Net Scheduled Receipts Outside Blythe On OFO Cycle	% Change in Receipts Outside of Blythe
1/11/17	N							
1/12/17	N							
1/13/17	N							
1/14/17	N							
1/15/17	N							
1/16/17	N							
1/17/17	N							
1/18/17	N							
1/19/17	N							
1/20/17	N							
1/21/17	N							
1/22/17	N							
1/23/17	N							
1/24/17	N							
1/25/17	N							
1/26/17	N							
1/27/17	N							
1/28/17	N							
1/29/17	N							
1/30/17	N							
1/31/17	N							
2/1/17	N							
2/2/17	N							
2/3/17	N							
2/4/17	N							
2/5/17	3	680,590	993,482	958,185	-3.6%	1,777,258	1,619,698	-8.9%
2/6/17	N							
2/7/17	N							
2/8/17	3	765,388	1,032,102	999,283	-3.2%	1,741,300	1,581,483	-9.2%
2/9/17	1	765,388	1,024,378	853,338	-16.7%	1,641,838	1,685,349	2.7%
2/10/17	N							
2/11/17	N							
2/12/17	N							
2/13/17	N							
2/14/17	4	719,134	951,226	915,560	-3.7%	1,934,520	1,896,342	-2.0%
2/15/17	1	719,134	915,573	914,136	-0.2%	1,899,201	1,849,634	-2.6%
2/16/17	N							
2/17/17	N							
2/18/17	N							
2/19/17	N							

INPUT (SSR)

Purchase Days	OFO?	OFO Cycle	110% S. Min	Scheduled Receipts at Blythe Prior to OFO	Scheduled Receipts at Blythe On OFO Cycle	% Change in Receipts at Blythe	Net Scheduled Receipts Outside Blythe Prior to OFO	Net Scheduled Receipts Outside Blythe On OFO Cycle	% Change in Receipts Outside of Blythe
2/20/17	Y	2	745,565	975,107	957,146	-1.8%	1,933,354	1,937,587	0.2%
2/21/17	N								
2/22/17	N								
2/23/17	N								
2/24/17	N								
2/25/17	N								
2/26/17	N								
2/27/17	N								
2/28/17	N								
3/1/17	Y	1	776,401	1,049,632	927,761	-11.6%	2,247,920	2,014,286	-10.4%
3/2/17	N								
3/3/17	N								
3/4/17	N								
3/5/17	N								
3/6/17	N								
3/7/17	N								
3/8/17	Y	1	700,413	899,735	757,370	-15.8%	1,837,654	1,702,330	-7.4%
3/9/17	N								
3/10/17	Y	2	698,210	799,057	804,043	0.6%	1,701,629	1,702,544	0.1%
3/11/17	Y	1	635,437	808,009	735,007	-9.0%	1,577,025	1,456,244	-7.7%
3/12/17	Y	2	594,690	735,160	735,139	0.0%	1,506,354	1,449,006	-3.8%
3/13/17	N								
3/14/17	Y	3	688,299	817,024	804,830	-1.5%	1,810,930	1,742,664	-3.8%
3/15/17	Y	1	688,299	805,687	768,281	-4.6%	1,729,913	1,737,391	0.4%
3/16/17	Y	1	687,198	776,278	826,741	6.5%	1,660,432	1,662,889	0.1%
3/17/17	Y	1	686,096	811,987	860,644	6.0%	1,612,400	1,504,784	-6.7%
3/18/17	Y	1	626,627	866,804	747,642	-13.7%	1,452,323	1,559,808	7.4%
3/19/17	Y	1	574,867	711,223	747,642	5.1%	1,340,304	1,557,230	16.2%
3/20/17	N								
3/21/17	Y	2	688,299	925,023	925,502	0.1%	1,785,145	1,806,690	1.2%
3/22/17	Y	1	691,602	874,198	816,467	-6.6%	1,581,065	1,678,561	6.2%
3/23/17	Y	2	670,678	877,432	877,432	0.0%	1,801,263	1,804,588	0.2%
3/24/17	Y	1	648,652	846,102	797,086	-5.8%	1,647,673	1,751,472	6.3%
3/25/17	Y	1	609,006	818,018	817,224	-0.1%	1,651,662	1,429,297	-13.5%
3/26/17	Y	3	544,031	816,948	800,468	-2.0%	1,414,828	1,355,377	-4.2%
3/27/17	N								
3/28/17	Y	3	549,538	771,805	762,051	-1.3%	1,654,563	1,547,381	-6.5%
3/29/17	Y	1	538,525	769,102	737,439	-4.1%	1,533,086	1,534,530	0.1%
3/30/17	Y	4	580,373	759,241	740,191	-2.5%	1,547,881	1,477,519	-4.5%
3/31/17	Y	2	563,855	838,101	851,668	1.6%	1,451,947	1,516,301	4.4%

INPUT (SSR)

Purchase

Days

Days	OFO?	OFO Cycle	110% S. Min	Scheduled Receipts at Blythe Prior to OFO	Scheduled Receipts at Blythe On OFO Cycle	% Change in Receipts at Blythe	Net Scheduled Receipts Outside Blythe Prior to OFO	Net Scheduled Receipts Outside Blythe On OFO Cycle	% Change in Receipts Outside of Blythe
5/20/17	Y	1	573,733	737,886	611,076	-17.2%	1,776,934	1,744,859	-1.8%
5/21/17	Y	3	621,176	659,006	654,614	-0.7%	1,747,143	1,677,931	-4.0%
5/22/17	Y	4	679,653	803,851	782,898	-2.6%	1,978,739	1,917,581	-3.1%
5/23/17	N								
5/24/17	N								
5/25/17	Y	1	643,243	808,880	663,987	-17.9%	1,858,961	1,799,106	-3.2%
5/26/17	Y	1	639,933	619,916	739,891	19.4%	1,708,147	1,750,512	2.5%
6/7/17	Y	1	634,416	703,899	673,148	-4.4%	1,771,233	1,824,290	3.0%
6/19/17	N								
6/25/17	N								
6/26/17	N								
7/1/17	N								
7/2/17	N								
7/3/17	N								
7/4/17	N								
7/5/17	N								
7/6/17	N								
7/7/17	N								
7/8/17	N								
7/9/17	Y	1	662,120	669,163	635,648	-5.0%	2,234,276	2,227,061	-0.3%
7/10/17	N								
7/11/17	Y	1	674,238	737,111	617,131	-16.3%	2,214,013	2,172,611	-1.9%
7/12/17	Y	1	679,747	658,570	621,149	-5.7%	2,135,079	2,131,699	-0.2%
7/13/17	N								
7/14/17	Y	4	685,255	622,451	619,703	-0.4%	2,150,523	2,083,560	-3.1%
7/15/17	Y	1	627,967	600,799	524,138	-12.8%	1,974,406	2,000,430	1.3%
7/16/17	Y	2	666,526	619,180	619,273	0.0%	2,003,011	2,004,953	0.1%
7/17/17	N								
7/18/17	Y	4	631,272	608,953	595,361	-2.2%	2,091,337	2,004,074	-4.2%
7/19/17	N								
7/20/17	N								
7/21/17	Y	3	630,170	575,764	575,256	-0.1%	1,999,987	1,951,894	-2.4%
7/22/17	Y	1	627,967	577,450	577,484	0.0%	1,929,628	1,902,101	-1.4%
7/23/17	Y	1	570,679	578,272	577,210	-0.2%	1,784,300	1,916,762	7.4%
7/24/17	N								
7/25/17	Y	3	741,167	699,382	698,335	-0.1%	1,993,972	1,880,274	-5.7%
7/26/17	N								
7/27/17	N								
7/28/17	Y	1	642,289	583,854	668,580	14.5%	2,075,238	1,976,013	-4.8%
7/29/17	Y	1	544,238	661,131	548,866	-17.0%	1,956,046	1,914,053	-2.1%



**ATTACHMENT H**

**Advice No. 5193**

**TRANSACTIONS, CONFIDENTIAL**

**CONFIDENTIAL AND PROTECTED MATERIALS PURSUANT TO PUC  
SECTION 583, GO 66-C, AND D.16-08-024**



ATTACHMENT I  
Advice No. 5193

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 54347-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 10	Revised 53967-G
Revised 54348-G	TABLE OF CONTENTS	Revised 53969-G
Revised 54349-G	TABLE OF CONTENTS	Revised 54346-G

Rule No. 41  
UTILITY SYSTEM OPERATION

Sheet 10

(Continued)

CPUC REPORTING REQUIREMENTS

- 26. The Utility shall file each post-Forum report resulting from the Forum with the CPUC by Advice Letter no later than 60 days after conclusion of the relevant Forum. The Utility shall also submit any tariff changes proposed in the Forum and agreed-to by the Utility for the CPUC approval by Advice Letter no later than 60 days after conclusion of each Forum.
- 27. On November 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 September 30 were in compliance with the standards, criteria and procedures described in Sections 9 through 19 above. 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 shall be amortized in customer transportation rates over the following year.

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TEMPORARY SETTLEMENT TERM

- 28. The Sections of this Rule italicized and followed by an asterisk (\*) are temporary and will end upon the expiration of the term in the settlement approved by D.16-12-015 and modified by D.17-03-020. Specifically, that settlement term will conclude upon the earlier of: (1) any superseding decision or order by the Commission, (2) return of Aliso Canyon to at least 450 MMcfd of injection capacity and 1,395 MMcfd of withdrawal capacity, or (3) November 30, 2017.

SPECIAL CONDITION

- 29. The Utility System Operator shall communicate with the California Independent System Operator (CAISO) and other Electric Grid Operators on an as-needed basis to help maintain the reliability of the Utility’s natural gas system and the electric grid. Such communications may result in operational changes by the Utility System Operator and changes in electric grid operations and electric generation dispatch order by CAISO and other grid operators. Such operational communications shall not be considered curtailments of natural gas service unless Utility expressly curtails service pursuant to Rule No. 23. SoCalGas and the Utility System Operator are not responsible for electric grid operations or reliability, but will take electric grid reliability into consideration, to the extent feasible, when making operational decisions.

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5193  
 DECISION NO. 09-11-006

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

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Oct 2, 2017  
 EFFECTIVE Oct 2, 2018  
 RESOLUTION NO. \_\_\_\_\_

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 52899-G,53351-G,51797-G,51798-G,53527-G,47360-G 53352-G,52673-G,53528-G,52901-G,52902-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,53529-G, 53839-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,32746-G,32747-G,50487-G,32749-G
39	Access to the SoCalGas Pipeline System .....	53711-G,-G,53712-G,53713-G,51965-G,51966-G
40	On-Bill Financing Program .....	44205-G,41155-G
41	Utility System Operation .....	51670-G,51671-G,53531-G,52680-G,51674-G 51675-G,53964-G,53965-G,53966-G,54347-G 53968-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
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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 DECISION NO. 09-11-006

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

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Oct 2, 2017  
 EFFECTIVE Oct 2, 2018  
 RESOLUTION NO. \_\_\_\_\_

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.

<u>GENERAL</u>	<u>Cal. P.U.C. Sheet No.</u>
Title Page .....	40864-G
Table of Contents--General and Preliminary Statement .....	54349-G,54138-G,54139-G,54176-G
Table of Contents--Service Area Maps and Descriptions .....	53356-G
Table of Contents--Rate Schedules .....	54344-G,54345-G,54288-G
Table of Contents--List of Cities and Communities Served .....	52484-G
Table of Contents--List of Contracts and Deviations .....	52484-G
Table of Contents--Rules .....	53910-G,54348-G
Table of Contents--Sample Forms .....	53958-G,53707-G,51537-G,53998-G,52291-G,52292-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 .....	54322-G,54323-G,54324-G,54148-G,54149-G,54325-G 54317-G,46431-G,46432-G,53561-G,54326-G,54327-G,54328-G,54154-G
Part III Cost Allocation and Revenue Requirement .....	53582-G,50447-G,53583-G
Part IV Income Tax Component of Contributions and Advances .....	52273-G,24354-G
Part V Balancing Accounts	
Description and Listing of Balancing Accounts .....	52939-G,54130-G
Purchased Gas Account (PGA) .....	52769-G,53254-G
Core Fixed Cost Account (CFCA) .....	53433-G,53434-G,53834-G,53436-G
Noncore Fixed Cost Account (NFCA) .....	53255-G,53835-G,53836-G
Enhanced Oil Recovery Account (EORA) .....	49712-G
Noncore Storage Balancing Account (NSBA) .....	52886-G,52887-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) .....	52940-G,52941-G
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA) .	52942-G,52943-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)

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