

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2017

Advice Letter 5197-G

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

SUBJECT: Expedited Advice Letter (EAL) Approval for Renewal of a Canadian Pipeline Capacity Contract between Southern California Gas Company (SoCalGas) and Foothills Pipe Lines Ltd. (Foothills)

Dear Mr. van der Leeden:

Advice Letter 5197-G is effective as of October 26, 2017.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division



Ronald van der Leeden
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.2009
Fax: 213.244.4957

RvanderLeeden@semprautilities.com

October 5, 2017

Advice No. 5197
(U 904G)

Public Utilities Commission of the State of California

Subject: Expedited Advice Letter Approval for Renewal of a Canadian Pipeline Capacity Contract between Southern California Gas Company and Foothills Pipe Lines Ltd. (Foothills)

Purpose

Southern California Gas Company (SoCalGas) respectfully requests approval by the California Public Utilities Commission (Commission) to renew the TransCanada Foothills System - BC Zone 8 capacity contract described below.

Background

Under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022, contracts for interstate capacity supported by the Office of Ratepayer Advocates (ORA) and The Utility Reform Network (TURN) may be submitted for approval to the Commission by an Expedited Advice Letter. ORA has been consulted and does not oppose the capacity contract as described. TURN was unable to participate in the review process for this contract due to timing constraints.

Description of Contract

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

Confidentiality

Due to the confidential nature of the contract which contains market-sensitive negotiated core capacity contract terms, a Confidential Attachment A, pursuant to

General Order (GO) 66-C, Section 583 of the Public Utilities Code, and D.16-08-024 is being provided to Energy Division, ORA, and TURN under the confidentiality provisions of a non-disclosure agreement. A declaration requesting confidential treatment is being provided to the Commission concurrently with this Advice Letter, pursuant to D.16-08-024.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 10 days of the date this Expedited Advice Letter was filed with the Commission, which is October 15, 2017. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

Copies of the protest should also be sent via email to the attention of Franz Cheng (fcc@cpuc.ca.gov) and the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). A copy of the protest shall also be sent via both e-mail and facsimile to the addresses shown below on the same date it is mailed or delivered to the Commission.

Attn: Ray B. Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-3718
E-Mail: ROrtiz@semprautilities.com

Attn: Joseph Mock
Regulatory Case Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-3718
E-Mail: JMock@semprautilities.com

Effective Date

SoCalGas believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this filing become effective on October 26, 2017, which is 21 calendar days after the date filed.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.04-01-025. Address change requests to the GO 96-B should be directed by electronic mail to 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.

Ronald van der Leeden
Director - Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

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

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Ray B. Ortiz

Phone #: (213) 244-3837

E-mail: 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) #: 5197

Subject of AL: Expedited Advice Letter Approval for Renewal of a Canadian Pipeline Capacity Contract between Southern California Gas Company and Foothills Pipe Lines Ltd. (Foothills)

Keywords (choose from CPUC listing): Contracts; Capacity

AL filing type: Monthly Quarterly Annual One-Time Other Periodic

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

D.04-09-022

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: See the Declaration of Confidentiality.

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 10/26/17

No. of tariff sheets: 0

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: None

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Southern California Gas Company
Attention: Ray B. Ortiz
555 West Fifth Street, GT14D6
Los Angeles, CA 90013-1011
ROrtiz@semprautilities.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 5197

**Terms of Capacity Agreement Between Southern California
Gas Company (SoCalGas) and Foothills Pipe Lines Ltd. (Foothills)**

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

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

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

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

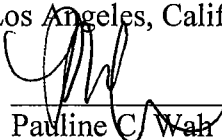
1. I am the Gas Transportation Manager, designated by Paul Goldstein, Officer and VP - Gas Acquisition in the Gas Acquisition Department for Southern California Gas Company ("SoCalGas"). I have reviewed the Expedited Advice Letter No. 5197, seeking approval for renewal of a Canadian Pipeline Capacity Contract between SoCalGas and Foothills Pipe Lines Ltd. (Foothills) submitted concurrently herewith (the "AL"). In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision ("D.16-08-024") to demonstrate that the confidential information ("Protected Information") provided as described in specificity in Attachment A, submitted within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities ("PUC") Code § 583, and General Order ("GO") 66-C.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

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

Executed this 5th day of October, 2017, at Los Angeles, California.



Pauline C. Wah
Gas Transportation Manager

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information provided in the email on the Update on Firm Backbone Transportation System (BTS) Bidding

Location/Title of Protected Information	Legal Justification for Withholding	Basis for Confidentiality Treatment
Attachment A to the AL	GO 66-C Section 2.2(b) Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq. <i>See, e.g., D.09-08-018, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential)</i>	SoCalGas derives economic value from this information being confidential, and it is subject to efforts by SoCalGas to maintain its confidentiality.