#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



January 11, 2018

**Advice Letter 5226-G** 

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

SUBJECT: Emergency Local Service Zone Curtailment Effective November 13, 2017 through November 22, 2017

Dear Mr. van der Leeden:

Advice Letter 5226-G is effective as of December 1, 2017.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Ramlofah



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

December 1, 2017

Advice No. 5226 (U 904 G)

Public Utilities Commission of the State of California

**Subject:** Emergency Local Service Zone Curtailment Effective November 13, 2017 through November 22, 2017

## **Purpose**

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter to notify the California Public Utilities Commission (Commission) and affected parties of a curtailment event in its service territory.<sup>1</sup>

### **Background**

SoCalGas Rule No. 23, Section J, provides the following:

The Utility shall submit an Advice Letter to the Commission's Energy Division within five business days from the conclusion of a non-maintenance-related curtailment. The filing shall state the facts underlying and the reasons for the curtailment, shall demonstrate that the type of curtailment being declared complies with the Utility's tariffs, and shall set forth efforts the Utility has taken to minimize or alleviate the curtailment. The filing shall be served by electronic mail or overnight mail on affected noncore customers and posted by the Utility on its Electronic Bulletin Board.

This Advice filing is being made consistent with that requirement.

<sup>1</sup> SoCalGas is submitting this Advice Letter pursuant to Decision (D.) 16-07-008.

### <u>Information</u>

## A. Facts Underlying and Reasons for the Curtailment

SoCalGas initiated an emergency curtailment of service in the Valley Local Service Zone beginning at 6:00 a.m. on November 13, 2017. The emergency curtailment of service ended at 8:30 p.m. on November 22, 2017.

The curtailment was issued to facilitate the repair of a pipeline leak. In an effort to minimize the impact to system reliability and to noncore customers, SoCalGas had initially scheduled the pipeline repair work as a planned maintenance outage and provided notice to impacted customers of the maintenance curtailment. However, after investigating the leak, SoCalGas discovered a condition in a section of the pipeline that required immediate remediation, creating an emergency condition. SoCalGas subsequently issued an emergency curtailment and notified impacted customers of the need for the emergency curtailment to facilitate the needed repairs. All service to core customers in the area was maintained through the use of compressed natural gas tanks.

The curtailed customers were noncore customers in the Lost Hills area of the Valley Local Service Zone, which is defined in SoCalGas' tariff maps, Boundary Index Map of Local Service Zones and Territorial Boundary Lines of Local Service Zones. A list of the affected customers is provided in Attachment A.

## B. Compliance with SoCalGas' Tariffs

This curtailment was instituted in accordance with Section E of Rule No. 30, Interruption of Service and Section E of Rule No. 23, Curtailment of Service. Each affected noncore customer was provided a Maximum Allowed Usage during the length of the curtailment.

## C. Efforts by SoCalGas to Minimize or Alleviate the Curtailment

SoCalGas notified the affected customers of the curtailment of service through their Account Manager and via our Electronic Bulletin Board, ENVOY®. Notices were posted on ENVOY® on November 8, 2017<sup>2</sup> and November 23, 2017.<sup>3</sup>

## **Confidentiality**

Due to the confidential nature of the information in Attachment A, a declaration requesting confidential treatment is included. The List of the Affected Customers in Attachment A is only being provided to Energy Division under the confidentiality provisions of General Order (GO) 66-C/D, Section 583 of the Public Utilities Code, and D.16-08-024.

<sup>2</sup>https://scgenvoy.sempra.com/index.html#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D1%26rand%3D36.

<sup>&</sup>lt;sup>3</sup>https://scgenvoy.sempra.com/index.html#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D1%26rand%3D36.

## **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter, which is December 21, 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 the Energy Division Tariff Unit (<u>EDTariffUnit@cpuc.ca.gov</u>). A copy of the protest shall also be sent via both e-mail <u>and</u> 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

## **Effective Date**

SoCalGas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to GO 96-B. It is in compliance with D.16-07-008. Therefore, SoCalGas respectfully requests that it be made effective on December 1, 2017, which is the date filed.

#### **Notice**

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for A.14-12-017, A.15-07-014, and A.15-06-020. Address change requests to the GO 96-B should be directed by electronic mail to <a href="mailto:tariffs@socalgas.com">tariffs@socalgas.com</a> or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at <a href="mailto:Process Office@cpuc.ca.gov">Process Office@cpuc.ca.gov</a>.

Ronald van der Leeden Director – Regulatory Affairs

Attachments

## CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)				
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G)				
Utility type:	Contact Person: Ray B. Ortiz			
☐ ELC	Phone #: (213) <u>244-3837</u>			
☐ PLC ☐ HEAT ☐ WATER	E-mail: ROrtiz@semprautilities.com			
EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)				
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat W				
Advice Letter (AL) #: 5226				
Subject of AL: Emergency Local Service Zone Curtailment Effective November 13, 2017 through November				
22, 2017				
Keywords (choose from CPUC listing): Curtailment				
AL filing type:  Monthly Quarterly Annual One-Time Other				
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:				
D.16-07-008				
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No				
Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A				
Does AL request confidential treatment? If so, provide explanation: See Declaration of Confidentiality.				
Resolution Required?		Tier Designation: 🛛 1 🔲 2 🔲 3		
Requested effective date: <u>12/1/17</u>		No. of tariff sheets: <u>0</u>		
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: N/A				
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 Southern California Gas Company				
Attention: Tariff Unit		Attention: Ray B. Ortiz		
505 Van Ness Ave.,		555 West 5th Street, GT14D6		
San Francisco, CA 94102		Los Angeles, CA 90013-1011		
EDTariffUnit@cpuc.ca.gov		ROrtiz@semprautilities.com Fariffs@socalgas.com		

 $<sup>^{\</sup>scriptscriptstyle 1}$  Discuss in AL if more space is needed.

## **ATTACHMENT A**

Advice No. 5226

## **List of Affected Customers**

Confidential and Protected Materials Pursuant to Public Utilities Code Section 583, General Order 66-C/D, and D.16-08-024

## Pursuant to GO 66-C/D

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

## DECLARATION OF RASHA PRINCE REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024

#### I, Rasha Price, do declare as follows:

- 1. I am Director in the Commercial/Industrial Services department, for Southern California Gas Company ("SoCalGas"). I have been delegated authority to sign this declaration by Lisa M. Alexander. I have reviewed Attachment A to Advice No. 5226 submitted concurrently herewith ("AL 5226 Attachment A"). I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.
- 2. I hereby provide this Declaration in accordance with Decision ("D.") 16-08-024 to demonstrate that the confidential information ("Protected Information") provided in AL 5226 Attachment A is within the scope of data protected as confidential under applicable law.
- 3. In accordance with the legal citations and narrative justification described in Attachment A, 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.

## Pursuant to GO 66-C/D

Executed this 1st day of December, 2017, at Los Angeles.

Rasha Prince

Director, Commercial/Industrial Services

## **ATTACHMENT A**

# SoCalGas Request for Confidentiality on the following information in its response to AL 5226 Attachment A

Location of	Legal Citations	Narrative Justification
Protected		
Information		
AL 5226 Attachment A	CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")  • Civil Code § 1798.80 et seq. (process for protecting customer records)  • Civil Code § 1798.98 (protecting energy usage data) • Evid. Code § 1060 • Civil Code § 3426 et seq.  CPRA Exemption, Gov't Code § 6254.7(d)  CPRA Exemption, Gov't Code § 6255(a) (Balancing Test)	When curtailments are called, information regarding affected customers should be limited to a geographical area. Information regarding an individual customer's rate or gas reductions could influence competition in the gas market, signal customers about product continuity, and violate a customer's privacy.  Data is market-sensitive information that, if revealed, would place customers at an unfair business disadvantage because it provides market sensitive information regarding customer usage data.