

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 15, 2018

Advice Letter 5267-G

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

SUBJECT: System-wide Curtailment Effective February 20, 2018 through March 6, 2018.

Dear Mr. van der Leeden:

Advice Letter 5267-G is effective as of March 13, 2018.

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

March 13, 2018

Advice No. 5267
(U 904 G)

Public Utilities Commission of the State of California

Subject: System-wide Curtailment Effective February 20, 2018 through March 6, 2018

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.¹

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. The Utility shall submit an Advice Letter to the Commission's Energy Division within five business days from the end of each calendar quarter providing the same information for all maintenance-related curtailments over the reporting period.

This Advice Letter filing is being made consistent with that requirement.

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

Information

A. Facts Underlying and Reasons for the Curtailment

On February 19, 2018, SoCalGas posted to its Electronic Bulletin Board, ENVOY[®] (Envoy) notice of a system-wide curtailment of service to begin at 7:00 a.m. on February 20, 2018, due to forecasted high customer demand resulting from low temperatures that exceeded system capacity without the use of withdrawal from the Aliso Canyon storage facility. The curtailment was initiated in compliance with the Aliso Canyon Withdrawal Protocol, dated November 2, 2017, and consistent with SoCalGas' Rule No. 23. Accordingly, electric generation customers were curtailed based on day-ahead demand forecasts and weather conditions. Concurrently, a system-wide curtailment watch was initiated for all other noncore customers, and these customers were advised that they may receive a notice to curtail service.

On February 20, SoCalGas notified customers on Envoy that low temperatures were expected to continue through the end of the following week and that the system-wide curtailment for electric generation customers and the system-wide curtailment watch for all other noncore customers would remain in effect until further notice. SoCalGas continued to coordinate with the electric Balancing Authorities in implementing the curtailments through the California Independent System Operator's (CAISO) "nomogram" process, whereby the total level of curtailment was defined by SoCalGas, and the locations of the actual curtailed electric generation facilities were determined by the nomogram through CAISO's dispatch model. For the Los Angeles Department of Water and Power (LADWP), SoCalGas worked directly with their System Operator(s) day-ahead to determine if the generators' curtailed forecast met SoCalGas' reliability needs. Under this curtailment protocol, SoCalGas was able to meet system demand utilizing storage withdrawal and flowing supplies, however on some days needed Aliso Canyon to maintain system reliability. SoCalGas posted additional status updates to Envoy on February 22, 2018 and March 2, 2018.

The system-wide curtailment of electric generation service ended at 7:00 a.m. on March 6, 2018, while the system-wide curtailment watch for all noncore customers ended at 7:00 a.m. on March 7, 2018. In an Envoy posting on March 5, 2018, providing notice of the curtailments terminus, SoCalGas noted that forecasted temperatures across its service territory were projected to increase, resulting in reductions in forecasted customer demand and thus allowing for the curtailment to be ended.

A list of the electric generator customers affected by the system-wide curtailment is provided in the confidential Attachment A.

B. Compliance with SoCalGas' Tariffs

This curtailment was instituted in accordance with Section C.1 of Rule No. 23, Effectuation of Curtailment. Accordingly, affected noncore customers were given usage instructions during the curtailment event.

C. Efforts by SoCalGas to Notify Affected Customers

SoCalGas notified the affected customers of the curtailment of service through their Account Manager and via Envoy. Notices were posted on Envoy on February 19, 2018, February 20, 2018, February 22, 2018, March 2, 2018, March 5, 2018, and March 6, 2018.²

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-D, Section 583 of the Public Utilities Code, and D.17-09-023.

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 April 2, 2018. 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 (EDTariffUnit@cpuc.ca.gov). A copy of the protest shall 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

²<https://scgenvoy.sempra.com/#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D1%26rand%3D80>

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 for service on March 13, 2018, which is the date submitted.

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.15-07-014 and A.15-06-020. Address change requests to the GO 96-B service list 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 904G)**

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) #: 5267

Subject of AL: System-wide Curtailment Effective February 20, 2018 through March 6, 2018

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? Yes No

Tier Designation: 1 2 3

Requested effective date: 3/13/18

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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

Tariff schedules affected: 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
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 5th Street, GT14D6
Los Angeles, CA 90013-1011
ROrtiz@semprautilities.com
Tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 5267

List of Affected Customers

**Confidential and Protected Materials Pursuant to Public Utilities
Code Section 583, General Order 66-D, and D.17-09-023**

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

**DECLARATION OF RASHA PRINCE
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.17-09-023**

I, Rasha Prince, do declare as follows:

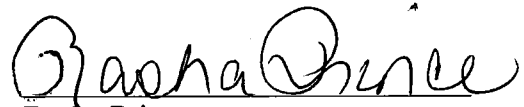
1. I am Director, Commercial/Industrial Services, for Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Lisa M. Alexander, Vice President, Customer Solutions and Communications. I have reviewed the confidential information included within Attachment A to Advice No. 5267 submitted concurrently herewith (AL 5267 Attachment A). I am personally familiar with the facts in this Declaration and, if called upon to 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.”) 17-09-023 and General Order (“GO”) 66-D to demonstrate that the confidential information provided in the AL 5267 Attachment A (“Protected Information”) is within the scope of data protected as confidential under applicable law.

3. In accordance with the 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.

Executed this 13th day of March, 2018, at Los Angeles.

A handwritten signature in cursive script that reads "Rasha Prince". The signature is written in black ink and is positioned above a horizontal line.

Rasha Prince
Director, Commercial/Industrial
Services

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information in its response to AL 5267 Attachment A

Location of Protected Information	Legal Citations	Narrative Justification
<p>AL 5267 Attachment A</p>	<p>CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none"> • Civil Code § 1798.80 <i>et seq.</i> (process for protecting customer records) • Civil Code § 1798.98 (protecting energy usage data) • Evid. Code § 1060 • Civil Code § 3426 <i>et seq.</i> <p>CPRA Exemption, Gov't Code § 6254.7(d)</p> <p>CPRA Exemption, Gov't Code § 6255(a) (Balancing Test)</p> <p>Cal. Pub. Util. Code § 8380(d) (a utility "shall use reasonable security procedures and practices to protect a customer's unencrypted electrical or gas consumption data from unauthorized access, destruction, use, modification, or disclosure") and associated CPUC Decisions (D.11-07-056 and D.12-08-045). Findings of Fact 23 and 27, D.12-08-045 ("23. Section 8380 of the Pub. Util. Code makes privacy protections for the usage data generated by AMI a basic consumer protection that both electrical and gas corporations must provide. 27.</p>	<p>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.</p> <p>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.</p> <p>Private customer data related to energy usage and its implications and savings. Public disclosure of this information could compromise privacy to the potential harm of customers. For example, the detailed hourly energy use at a home could reveal if a customer is away from their home for long periods of time exposing them to home invasion robberies or other criminal acts.</p> <p>Customer equipment, processes, and operations provide competitive advantages in certain industries and</p>

	<p>Since there are no obstacles that would prevent the extension of the privacy rules, and since such an extension is consistent with the provisions of Section 8380 of the Pub. Util. Code, it is reasonable to extend the privacy rules adopted in D.11-07-056 (and contained in Attachment A herein) to gas corporations.”)</p>	<p>can be considered trade secrets. Allowing information detailing such information could cause financial harm to customers.</p>
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