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March 15, 2018

Advice No. 5268
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Emergency Local Service Zone Curtailment Effective February 9, 2018
through March 8, 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.

This Advice 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

SoCalGas initiated an emergency localized curtailment of service in the city of Hanford beginning at 9:00 a.m. on February 9, 2018. The emergency curtailment of service ended at 11 a.m. on March 8, 2018. The curtailment was issued in order to complete pipeline repairs following anomalies that were discovered on a distribution operated pipeline after an in-line inspection was completed.

The curtailed customers were electric generation customers in the city of Hanford area of the North Valley System 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 confidential 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 Due to Emergency Conditions. 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 February 9, 2018 and March 8, 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 4, 2018. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

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

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 March 15, 2018, 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 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) #: 5268

Subject of AL: Emergency Local Service Zone Curtailment Effective February 9, 2018 through March 8, 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: 3/15/18

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. 5268

List of Affected Customers

**Confidential and Protected Materials Pursuant to
GO 66-D, PUC Section 583, 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. 5268 submitted concurrently herewith (AL 5268 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 5268 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 15th day of March, 2018, at Los Angeles.

A handwritten signature in black ink that reads "Rasha Prince". The signature is written in a cursive style with a large, prominent initial "R".

Rasha Prince
Director, Commercial/Industrial
Services

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information in its response to AL 5268 Attachment A

Location of Protected Information	Legal Citations	Narrative Justification
<p>Items Highlighted in grey in AL 5268 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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