PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



November 26, 2018

Advice Letter 5345

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

SUBJECT: Biennial Report on Backbone Transmission and Slack Capacity in Compliance with Decision (D.) 06-09-039.

Dear Mr. van der Leeden:

Advice Letter 5345 is effective as of November 20, 2018.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Rambofate



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

August 31, 2018

Advice No. 5345 (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Biennial Report on Backbone Transmission and Slack Capacity in Compliance with Decision (D.) 06-09-039

Southern California Gas Company (SoCalGas) hereby submits its biennial report to demonstrate that it holds adequate backbone transmission capacity and has slack capacity consistent with its proposals in the Gas Market Rulemaking (R.04-01-025).

Purpose

This Advice Letter (AL) complies with Ordering Paragraph (OP) 3 of D.06-09-039 which states:

The Pacific Gas and Electric Company and the Southern California Gas Company shall demonstrate in biennial advice letter filings [submittals] to the Commission's Energy Division starting 2008 that they hold adequate backbone transmission capacity and have slack capacity consistent with their proposals presented herein. The first filing [submittal] is due July 1, 2008.

Background

In response to reports and ongoing changes in the natural gas market which indicated that there may not be sufficient natural gas supplies or infrastructure to meet the long-term needs of the state's residential and business customers, the Commission initiated R.04-01-025. In the Assigned Commissioner's Scoping Memo of February 28,

2005, the Commission identified the following question for consideration in Phase 2 of this proceeding.¹

Can the California gas utilities' existing infrastructure and operations adequately protect California from short-term or long-term natural gas shortages caused by the interruptions in natural gas supply?

Most of the natural gas transported via the interstate pipelines, as well as some of the California produced natural gas, is delivered into the Pacific Gas and Electric Company (PG&E) and SoCalGas intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" natural gas pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or natural gas storage fields. In D.06-09-039, the Commission determined that it was "comfortable with the total amount of firm backbone transmission capacity on both the PG&E and SoCalGas systems." In an effort to continue to monitor the continuing sufficiency of backbone capacity on the PG&E and SoCalGas systems, the Commission also required PG&E and SoCalGas to demonstrate in AL submittals with the Commission's Energy Division that they hold adequate backbone transmission capacity. These AL submittals are to be made on a biennial basis, beginning July 1, 2008.³

Capacity Information

In R.04-01-025, SoCalGas explained to the Commission that it held a 49% annual reserve margin at the time and that, historically, its reserve margins have been between 40%-50%.⁴ On January 23, 2017, SoCalGas noticed the market via the ENVOY® electronic bulletin board of its intent to permanently reduce the receipt capacity of the Line 85 Zone from 160 million cubic feet per day (MMcfd) to 60 MMcfd following the abandonment and derating of transmission pipeline in that Zone for safety purposes.⁵ Additionally, several pipelines in the SoCalGas Northern Zone have been removed from service for safety remediation, reducing the Northern Zone receipt capacity from 1,590 MMcfd to 870 MMcfd at present. SoCalGas is working expeditiously on these pipelines

¹ Phase 1 of this proceeding was limited to issues related to the utilities' acquisition of interstate capacity and was resolved in D.04-09-022.

² D.06-09-039, mimeo., at 172 (Finding of Fact 12).

³ D.06-09-039, mimeo., at 27.

⁴ D.06-09-039, mimeo., at 171 (Finding of Fact 8). The Reserve Margin of backbone capacity in excess of demand on the SoCalGas system is derived by the formula: Reserve Margin = (Firm Daily Receipt Capacity – Average Daily Demand)/ Average Daily Demand.

⁵ "Information Regarding BTS Open Seasons", Critical Notices, 01/23/2017, <a href="https://scgenvoy.sempra.com/#nav=/Public/ViewExternalEbb.getMessageLedger%3FledgerType%3Dmessage%26Page%3Dfilter%26datePosted_from%3D01%252F23%252F2017%26datePosted_to%3D01%252F23%252F2017%26keyword%3DBTS%2520Open%26folderId%3D0%26 rand%3D203.

but at this time has not determined when Northern Zone receipt capacity will be restored, and at what level.

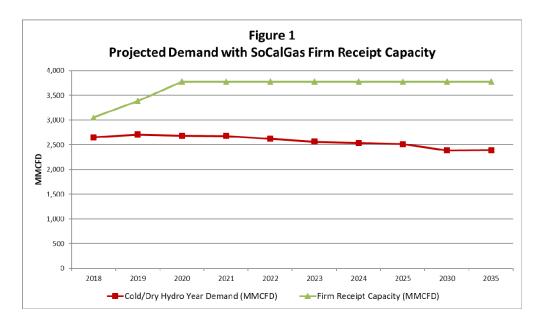
Table 1 and Figure 1 below illustrate the SoCalGas receipt capacity and reserve margin through 2035. SoCalGas calculates only a 16% reserve margin to be available in 2018. The reserve margin will increase to its traditional 40%-50% with the restoration of the Northern Zone pipelines.

Table 1⁶
SoCalGas Reserve Margin
1-in-10 Cold and Dry-Hydroelectric Condition

Year	Average Daily Demand: 1-in-10 Cold Year (MMCFD)	Reserve Margin (%)
2018	2,651	16%
2019	2,706	25%
2020	2,679	41%
2025	2,512	50%
2030	2,388	58%
2035	2,390	58%

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⁶ Demand source: SoCalGas 2018 California Gas Report. Reserve margin relative to current SoCalGas receipt capacity of 3,080 MMcfd for 2018, 3,385 MMcfd for 2019, and 3,775 MMcfd for 2020 and beyond assuming the full recovery of Northern Zone receipt capacity, though as stated earlier, SoCalGas has not determined when Northern Zone receipt capacity will be restored, and at what level. Note that all figures are estimated theoretical receipt capacities. Actual receipt capacity is usually somewhat lower for a variety of reasons, including lower deliveries from California producers, and economic and practical factors that result in less than full utilization of certain receipt points.



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 September 20, 2018. The address for mailing or delivering a protest to the Commission is given below.

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

A copy 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 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

Effective Date

SoCalGas believes this AL is subject to Energy Division disposition and should be classified as a Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal be approved on September 30, 2018, which is 30 calendar days from the date submitted.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.04-01-025, Gas Market OIR. Address change requests to the GO 96-B service list should be directed by e-mail to tariffs@socalgas.com, or call 213-244-3387. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by e-mail at Process_Office@cpuc.ca.gov.

Ronald van der Leeden Director - Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER SUBMITTAL SUMMARY ENERGY UTILITY

Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G) Utility type: GAS Phone #: (213) 244-3837 PLC HEAT WATER E-mail: ROrtiz@semprautilities.com EXPLANATION OF UTILITY TYPE (Date Submitted/ Received Stamp by CPUC) ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water Advice Letter (AL) #: 5345 Subject of AL: Biennial Report on Backbone Transmission and Slack Capacity in Compliance with Decision (D.) 06-09-039 Keywords (choose from CPUC listing): Capacity, Storage AL type: Monthly Quarterly Annual One-Time Other Biennial If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-09-039 Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No. N/A Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A
□ FLC □ GAS □ Phone #: (213) 244-3837 □ PLC □ HEAT □ WATER □ E-mail: ROrtiz@semprautilities.com EXPLANATION OF UTILITY TYPE □ (Date Submitted/ Received Stamp by CPUC) ELC = Electric □ GAS = Gas PLC = Pipeline □ HEAT = Heat □ WATER = Water Advice Letter (AL) #: 5345 Subject of AL: Biennial Report on Backbone Transmission and Slack Capacity in Compliance with Decision (D.) 06-09-039 Keywords (choose from CPUC listing): Capacity, Storage AL type: □ Monthly □ Quarterly □ Annual □ One-Time □ Other Biennial If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-09-039 Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No. N/A Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A
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Does AL request confidential treatment? If so, provide explanation: No
Resolution Required?
Requested effective date: $9/30/18$ 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 proposed ¹ : 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 submittal, 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 EDToriff Unit Converse of Carron C
EDTariffUnit@cpuc.ca.gov ROrtiz@semprautilities.com Tariffs@socalgas.com

¹ Discuss in AL if more space is needed.