PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



Advice Letter 5476

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 on June 1, 2019

Dear Mr. van der Leeden:

Advice Letter 5476 is effective as of June 07, 2019.

Sincerely,

Edward Ramloph

Edward Randolph Deputy Executive Director for Energy and Climate Policy/ 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 <u>RvanderLeeden @semprautilities.com</u>

June 7, 2019

Advice No. 5476 (U 904 G)

Public Utilities Commission of the State of California

Subject: Emergency Local Service Zone Curtailment Effective on June 1, 2019

<u>Purpose</u>

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 submittal is being made consistent with that requirement.

Information

A. Facts Underlying and Reasons for the Curtailment

SoCalGas initiated an emergency localized curtailment of service in the city of Oxnard

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

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beginning at 12:00 a.m. on June 1, 2019. The emergency curtailment of service ended at 12:38 p.m. on June 1, 2019. The curtailment was issued in order to facilitate the repair of a natural gas pipeline.

In an ENVOY® posting dated May 28, 2019, SoCalGas also announced a system-wide voluntary curtailment for electric generation customers effective June 1, 2019. The system-wide voluntary curtailment order was issued in compliance with the Aliso Canyon Withdrawal Protocol as a voluntary request coordinated through the Balancing Authorities (CAISO and LADWP) to reduce electric generation demand on the system without impacting electric system integrity. That curtailment notice clarified that the requisite maintenance was to remove a stuck probe on Line 225 to allow the performance of compliance-driven maintenance inspections. The same requisite maintenance was the impetus for the emergency curtailment of service in the city of Oxnard on June 1 because gas from Line 225 provides supply to the Oxnard region.

The curtailed customers were electric generation customers in the city of Oxnard. A list of the affected customers is provided in Attachment A (Confidential).

B. Compliance with SoCalGas' Tariffs

This emergency local service zone curtailment was instituted in accordance with Section E of SoCalGas 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 May 29, 2019 and June 1, 2019.²

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 June 27, 2019. The address for mailing or delivering a protest to the Commission is:

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

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: <u>ROrtiz@semprautilities.com</u>

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 June 7, 2019, which is the date submitted.

<u>Notice</u>

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for A.15-06-020 and A.18-07-024. Address change requests to the GO 96-B service list should be directed via e-mail to <u>tariffs@socalgas.com</u> or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at <u>Process Office@cpuc.ca.gov</u>.

Ronald van der Leeden Director – Regulatory Affairs

Attachments



California Public Utilities Commission

ADVICE LETTER SUMMARY ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)			
Company name/CPUC Utility No.:			
Utility type: ELC GAS WATER PLC HEAT	Contact Person: Phone #: E-mail: E-mail Disposition Notice to:		
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat	(Date Submitted / Received Stamp by CPUC)		
Advice Letter (AL) #:	Tier Designation:		
Subject of AL:			
Keywords (choose from CPUC listing): AL Type: Monthly Quarterly Annual One-Time Other: If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:			
Does AL replace a withdrawn or rejected AL? I	f so, identify the prior AL:		
Summarize differences between the AL and the prior withdrawn or rejected AL:			
Confidential treatment requested? Yes No			
If yes, specification of confidential information: Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:			
Resolution required? Yes No			
Requested effective date:	No. of tariff sheets:		
Estimated system annual revenue effect (%):			
Estimated system average rate effect (%):			
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:			
Service affected and changes proposed ^{1:}			
Pending advice letters that revise the same tariff sheets:			

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 Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102 Email: <u>EDTariffUnit@cpuc.ca.gov</u>	Name: Title: Utility Name: Address: City: State: Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx: Email:
	Name: Title: Utility Name: Address: City: State: Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx: Email:

ATTACHMENT A

Advice No. 5476

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 Price, 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 Jeffery L. Walker, Vice President, Customer Solutions & Strategy. I have reviewed the confidential information included within Attachment A to Advice No. 5476 submitted concurrently herewith (AL 5476 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 ("Protected Information") provided in the AL 5476 Attachment A 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.

1

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 7th day of June, 2019, at Los Angeles.

Ce

Rasha Prince Director, Commercial/Industrial Services

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information in its response to AL 5476 Attachment A

Location of Protected Information	Legal Citations	Narrative Justification
Items Highlighted in grey in AL 5476 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.