

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 23, 2019

Ronald van der Leeden
Director, Regulatory Affairs,
Southern California Gas Co.
555 W. Fifth Street, GT 14D6
Los Angeles, CA 90013-1011

SUBJECT: Expedited Advice Letter Approval for Renewal of a Canadian Pipeline Capacity Contract Between Southern California Gas Company and Foothills Pipe Lines Ltd. (Foothills)

Dear Mr. van der Leeden,

Advice Letter 5524 is approved and effective as of October 23, 2019, per the expedited approval process pursuant to Decision 04-09-002.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

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
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RvanderLeeden@socalgas.com

October 2, 2019

Advice No. 5524
(U 904G)

Public Utilities Commission of the State of California

Subject: Expedited Advice Letter Approval for an Interstate Capacity Contract

Purpose

Southern California Gas Company (SoCalGas) respectfully requests approval by the California Public Utilities Commission (CPUC or Commission) of an interstate capacity contract, as described in Attachment A.

Background

Under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022, contracts for interstate capacity supported by the Public Advocates Office (Cal PA) and The Utility Reform Network (TURN) may be submitted for approval to the Commission by an Expedited Advice Letter. Cal PA has been consulted and does not oppose the capacity contract as described. TURN was unable to participate in the review process for this contract.

Description of Contract

The terms of the contract are confidential and are described in Attachment A. This submittal will not create any deviations from SoCalGas' tariffs, cause withdrawal of service from any present customer, or impose any more or less restrictive conditions.

Confidentiality

Due to the confidential nature of the contract which contains market-sensitive negotiated core capacity contract terms, a Confidential Attachment A is being provided to Energy Division and Cal PA pursuant to General Order (GO) 66-D, Section 583 of the Public Utilities Code, and D.17-09-023, and to TURN under the confidentiality provisions

of a non-disclosure agreement. A declaration requesting confidential treatment is being provided to the Commission concurrently with this Advice Letter, pursuant to 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 10 days of the date this Expedited Advice Letter was submitted with the Commission, which is October 12, 2019. 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 Jean Spencer (jean.spencer@cpuc.ca.gov) and 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 addresses 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@socalgas.com

Attn: Joseph Mock
Regulatory Case Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-4957
E-Mail: JMock@socalgas.com

Effective Date

SoCalGas believes that this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this submittal become effective on October 23, 2019, which is 21 calendar days after 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 in R.04-01-025 and A.19-06-009. Address change requests to the GO 96-B service list should be directed by e-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 e-mail at Process_Office@cpuc.ca.gov.

Ronald van der Leeden
Director - Regulatory Affairs

Attachments



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? If 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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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: EDTariffUnit@cpuc.ca.gov

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. 5524

Terms of Capacity Contract

This Attachment is being provided only to the Energy Division and Public Advocates Office under the confidentiality provisions of the General Order 66-D, Section 583 of the Public Utilities Code, and D.17-09-023 and to The Utility Reform Network under a nondisclosure agreement.

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

**DECLARATION OF PAULINE C. WAH
REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.17-09-023**

I, Pauline C. Wah, do declare as follows:

1. I am the Gas Transportation Manager, designated by Jawaad Malik, Officer and VP - Gas Acquisition in the Gas Acquisition Department for Southern California Gas Company ("SoCalGas"). I have reviewed the Expedited Advice Letter No. 5524, seeking approval for the capacity contract, submitted concurrently herewith (the "AL 5524"). In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or 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 5524 submitted concurrently herewith, 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.

Executed this 2nd day of October, 2019, at Los Angeles, California.



Pauline C. Wah
Gas Transportation Manager

ATTACHMENT A

SoCalGas Request for Confidentiality on the following information provided in AL 5524

Location/Title of Protected Information	Legal Citations	Narrative Justification
Respective Attachment A to the AL	<p>CPRA Exemption, Gov't Code § 6254.7(d) (Trade Secrets)</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"> • Evid. Code § 1060 • Civil Code § 3426 <i>et seq.</i> • <i>See, e.g.,</i> D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential). 	<p>Market-sensitive negotiated core capacity contract terms, if disclosed, would put SoCalGas and the pipeline at a competitive disadvantage, because it would give other shippers, competitors, or market participants insight into SoCalGas' and the pipeline's negotiating positions. The disclosure of this information could result in higher transportation costs to core ratepayers.</p>