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



November 5, 2019

Advice Letter 5527-G

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

SUBJECT: Quarterly Summary of Maintenance Related Curtailments July 1, 2019-September 30, 2019.

Dear Mr. van der Leeden:

Advice Letter 5527-G is effective as of October 7, 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 RvanderLeeden@socalgas.com

October 7, 2019

<u>Advice No. 5527</u> (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Quarterly Summary of Maintenance Related Curtailments – July 1, 2019 – September 30, 2019

<u>Purpose</u>

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter (AL) to notify the California Public Utilities Commission (Commission) and affected parties of curtailment events 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 AL submission is being made consistent with that requirement, and covers all maintenance-related curtailments that occurred during the period of July 1, 2019 through September 30, 2019. The following table summarizes the maintenance-related curtailments that occurred over the reporting period. Each event is

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

described in more detail in the following sections. Attachment A includes a list of affected customers for each event.

Curtailment Event Start Date	Curtailment Event End Date	Affected Area
August 5, 2019, 6:00 a.m.	August 9, 2019, 1:30 p.m.	McKittrick
August 13, 2019, 6:00 a.m.	August 15, 2019, 2:00 p.m.	San Joaquin

August 5-9, 2019 Curtailment Event Information (McKittrick)

A. Facts Underlying and Reasons for the Curtailment

SoCalGas initiated a localized curtailment of service in city of McKittrick beginning at 6:00 a.m. on August 5, 2019. The localized curtailment of service ended at 1:30 p.m. on August 9, 2019. SoCalGas implemented this localized curtailment in order to perform maintenance work.

The affected customers were located in city of McKittrick. A list of the affected customers is provided in Attachment A.

B. Compliance with SoCalGas' Tariffs

This curtailment was instituted in accordance with Section E.2 of Rule No. 30, Interruption of Service, and Section C.1 of Rule No. 23, Effectuation of Curtailment. Accordingly, each affected noncore customer was provided a maximum usage 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 the ENVOY® electronic bulletin board (ENVOY®). Notices were posted on ENVOY® on July 18, 2019 and August 12, 2019.²

August 13-15, 2019 Curtailment Event Information (San Joaquin)

A. Facts Underlying and Reasons for the Curtailment

SoCalGas initiated a localized curtailment of service in the San Joaquin area at 6:00 a.m. on August 13, 2019. The localized curtailment of service ended at 2:00 p.m. on August 15, 2019. SoCalGas implemented this localized curtailment in order to facilitate maintenance work being done by Pacific Gas and Electric Company.

²<u>https://scgenvoy.sempra.com/#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D</u> <u>1%26rand%3D80</u>

The affected customers were located in the city of San Joaquin. A list of the affected customers is provided in Attachment A.

B. Compliance with SoCalGas' Tariffs

This curtailment was instituted in accordance with Section E.2 of Rule No. 30, Interruption of Service, and Section C.1 of Rule No. 23, Effectuation of Curtailment. Accordingly, each affected noncore customer was provided a maximum usage 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 August 1, 2019 and August 15, 2019.³

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 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 received within 20 days of the date of this AL, which October 27, 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 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.

³<u>https://scgenvoy.sempra.com/#nav=/Public/ViewExternalEbb.getMessageLedger%3FfolderId%3D</u> <u>1%26rand%3D80</u>

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@socalgas.com</u>

Effective Date

SoCalGas believes this AL 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 October 7, 2019, which is the date submitted.

Notice

A copy of this AL 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 by 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 by 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 PLC = Pipeline HEAT = Heat WATER = Water	(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. 5527

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. 5527 submitted concurrently herewith (AL 5527 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 5527 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 October, 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 5527 Attachment A

Location of Protected Information	Legal Citations	Narrative Justification
Items Highlighted in grey in AL 5527 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.