

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Southern California Gas Company**  
**GAS (Corp ID 904)**  
**Status of Advice Letter 5871G**  
**As of October 11, 2021**

Subject: Expedited Advice Letter Approval for Capacity Contract between Southern California Gas Company and Foothills Pipe Lines Ltd. (Foothills).

Division Assigned: Energy

Date Filed: 09-28-2021

Date to Calendar: 10-01-2021

Authorizing Documents: D0409022

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>10-19-2021</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Ray Ortiz

213-244-3837

[ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



**Joseph Mock**  
Director  
Regulatory Affairs

555 W. Fifth Street, GT14D6  
Los Angeles, CA 90013-1011  
Tel: 213.244.3718  
Fax: 213.244.4957  
[JMock@socalgas.com](mailto:JMock@socalgas.com)

September 28, 2021

Advice No. 5871  
(U 904G)

Public Utilities Commission of the State of California

**Subject: Expedited Advice Letter Approval for Capacity Contract between Southern California Gas Company and Foothills Pipe Lines Ltd. (Foothills)**

### **Purpose**

Southern California Gas Company (SoCalGas) respectfully requests approval by the California Public Utilities Commission (Commission or CPUC) of an interstate capacity contract with Foothills Pipe Lines Ltd. (Foothills).

### **Background**

Under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022, contracts for interstate capacity supported by the Public Advocates Office and The Utility Reform Network (TURN) may be submitted for approval to the Commission by an Expedited Advice Letter.<sup>1</sup> The Public Advocates Office has been consulted and does not oppose the capacity contracts as described. TURN did not participate in the review process.

---

<sup>1</sup> See D.04-09-022 at 87 (Finding of Fact 11), which found SoCalGas' request to establish and implement expedited advice letter procedures for pre-approval of certain interstate pipeline and storage capacity contracts to be reasonable. See also *id.* at 95 (Ordering Paragraph 2), which granted SoCalGas' request to establish capacity contract approval procedures for an initial period of five years, subject to the modifications described therein, as well as authorized SoCalGas to seek continuation or modification of these procedures by Advice Letter. SoCalGas Advice No. 5765 was approved on March 5, 2021, and extended the capacity contract approval procedures through March 31, 2024.

**Description of Contract**

The terms of the contracts 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.

Furthermore, the capacity of this proposed contract is within the capacity planning ranges approved by the Commission in D.04-09-022 and most recently established by Advice No. 5699, effective October 28, 2020.

**Confidentiality**

Due to the confidential nature of the contracts which contains market-sensitive negotiated core capacity contract terms, a Confidential Attachment A, pursuant to General Order (GO) 66-D, Section 583 of the Public Utilities Code, and D.17-09-023 is being provided to Energy Division and the Public Advocates Office, 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 8, 2021. 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

A copy of the protest should also be sent via e-mail to the attention of Jean Spencer ([jean.spencer@cpuc.ca.gov](mailto:jean.spencer@cpuc.ca.gov)) and the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this Advice Letter via U.S. mail or fax. Please submit protests or comments to this Advice Letter via e-mail to the addresses shown below on the same date it is mailed or e-mailed 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](mailto:ROrtiz@socalgas.com)  
E-Mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

Attn: Jordan Calzadillas  
Regulatory Case Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-3718  
E-Mail: [JCalzadi@socalgas.com](mailto:JCalzadi@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 19, 2021, 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 list in R.04-01-025. Address change requests to the GO 96-B service list should be directed by e-mail to [Tariffs@socalgas.com](mailto: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](mailto:Process_Office@cpuc.ca.gov).

*/s/ Joseph Mock*  
Joseph Mock  
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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss 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](mailto: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:

**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 Wah, do declare as follows:

1. I am the Gas Transportation Manager, designated by Elsa Valay-Paz, VP of Gas Acquisition for Southern California Gas Company (“SoCalGas”) to submit this declaration. I have reviewed the Expedited Advice Letter No. 5871, seeking approval for the capacity contract between SoCalGas and Foothills, submitted herewith (the “AL 5871”). 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 Presentation 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 24th day of September 2021, at Los Angeles, California.

**Pauline Wah** Digitally signed by Pauline Wah  
Date: 2021.09.23  
16:03:48 -07'00'  
\_\_\_\_\_  
Pauline C. Wah  
Gas Transportation Manager



# ATTACHMENT A

## SoCalGas Request for Confidentiality on the following information provided in AL 5871

Location/Title of Protected Information	Legal Citation	Narrative Justification
Respective Attachment A (with) to the AL (information highlighted in “Gray”).	<p>CPR A Exemption, Gov’t Code § 6254.7(d) (Trade Secrets)</p> <p>CPR A 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"> <li>• Evid. Code § 1060</li> <li>• Civil Code § 3426 <i>et seq.</i></li> </ul> <p>D.06-06-066 electric IOU Matrix item (I)(B)(2) by analogy</p>	Data is commercially sensitive, the disclosure of which would provide market participants and SoCalGas’ competitors insight into Gas Acquisition’s procurement and hedging strategies and decision-making process, current and future potential positions, purchase and sale patterns, core demand, capacity utilization pattern, storage position, etc. which would place Gas Acquisition at an unfair business disadvantage. This could ultimately result in increased cost to core ratepayers. If disclosed, SoCalGas’ competitors and market participants could also derive economic value from this information.

**ATTACHMENT A**

**Advice No. 5871**

**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.**