

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 7, 2022

**Advice Letter 5893-G and
5893-G-A**

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

**SUBJECT: 2021 Annual Compliance Report on Utility System Operator's Southern
System Reliability Purchases and Sales (October 1, 2020, through September
30, 2021).**

Dear Mr. van der Leeden:

Advice Letter 5893-G and 5893-G-A is effective as of June 2, 2022. Per Resolution G-3588 ordering paragraphs.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pete Skala".

Pete Skala
Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division, CPUC



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

November 9, 2021

Advice No. 5893-A
(U 904 G)

Public Utilities Commission of the State of California

Subject: Supplement - 2021 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (October 1, 2020, through September 30, 2021)

Southern California Gas Company (SoCalGas) hereby submits to the California Public Utilities Commission (Commission or CPUC) this supplemental advice letter (AL) of its 2021 Annual Compliance Report (ACR) to demonstrate that activities to maintain Southern System reliability from October 1, 2020, through September 30, 2021, are in compliance with the standards, criteria, and procedures described in Sections 10 through 20 of SoCalGas Rule No. 41.

Advice No. 5893-A replaces Advice No. 5893 in its entirety to include an additional transaction completed by the Utility Gas Procurement Department as the provider of last resort in accordance with Section 13 of Rule No. 41 and to correct the cost to satisfy the Southern System minimum flow requirements from \$8,450,259 to \$8,575,372. The details of this transaction are provided below, and Table 1 has been updated.

Background

Pursuant to SoCalGas Rule No. 41, Section 26, SoCalGas is to submit an ACR on November 1 of each year regarding its Southern System reliability procurement activities:

On November 1 of each year, the Utility shall provide a report ("Annual Compliance Report") demonstrating that the Operational Hub's procurement activities during the preceding twelve months ending September 30 were in compliance with the standards, criteria and procedures described in Sections 10 through 20 above. The Annual Compliance Report shall be submitted to the Energy Division by Advice Letter and shall be subject to comment or protest. Upon

Energy Division review and verification of the Annual Compliance Report and the CPUC Resolution approving the Annual Compliance Report, all the transactions entered into the SRMA balance for the year in question that are found reasonable by the Energy Division shall be amortized in customer transportation rates over the following year.¹

In Resolution (Res.) G-3480, the Commission provided additional direction regarding what information should be included in future ACRs:

3.(b) Incorporates a table, in the text of the ACR, that presents the number and percent of transactions and the corresponding dollar amount and percent of total dollars that SoCalGas asserts are reasonable by nature of having met the requirements of Rule 41.

...

5. SoCalGas shall incorporate, in all future ACRs, a table, as described in ordering paragraph 3.(b) and narrative explanations supported by appropriate documentation for any transactions to be evaluated as reasonable under Section 15 of Rule 41.²

Discussion

In accordance with Rule No. 41, SoCalGas hereby submits its 2021 ACR for the period October 1, 2020, through September 30, 2021. SoCalGas believes that all of the transactions described in this ACR are reasonable and subject to amortization in customer transportation rates during 2022.

A. Transaction Overview

As shown in Attachment A, from October 1, 2020, through September 30, 2021, SoCalGas spent \$8,450,259 to help satisfy the Southern System minimum flow requirements. SoCalGas purchased 519,829 Dth (net of in-kind fuel) of gas at Southern System receipt points (i.e., Ehrenberg and Otay Mesa) for \$12,832,941. This gas was then resold at the SoCal Citygate for \$4,591,208 for a net loss of \$8,241,733. In addition to this net purchase loss, the System Operator incurred \$208,526 in transportation charges.

¹ The acronym "SRMA" in the quotation above refers to SoCalGas' System Reliability Memorandum Account. As explained in Rule No. 41, Section 21, "The cost and revenues of Operational Hub transactions (e.g., natural gas purchases, sales, or exchanges resulting from approved contracts) that are necessary to meet minimum flow requirements shall be recorded in the System Reliability Memorandum Account (SRMA)."

² Res. G-3480 (June 27, 2013), pp. 12-13. After the issuance of this resolution, SoCalGas added new sections to Rule No. 41 (effective July 12, 2012), and the existing Section 13, 14, and 15 were changed to Sections 14, 15, and 16 in Rule No. 41 (effective June 1, 2018).

Furthermore, SoCalGas incurred an incremental charge of \$125,113 as a result of a transaction made by the Utility Gas Procurement Department as provider of last resort on August 16, 2021. Therefore, the total net cost SoCalGas incurred to help satisfy Southern System minimum flow requirements from October 1, 2020, through September 30, 2021, was \$8,575,372.

B. Transaction Detail

Attachment B provides the details of the spot purchases and sales summarized in Attachment A. There was no baseload contract activity from October 2020, through September 2021. In compliance with Res. G-3480, Table 1 below presents the number and percent of transactions, the corresponding dollar amount, and percent of total dollars for each section of Rule No. 41.³ The transactions are classified into the four sections of Rule No. 41, "Purchases and Sales to Manage Minimum Flow Supplies," as follows:

- I. Section 13 of Rule No. 41:⁴ 6% of purchases were made under Section 13. Two transactions, TC# 3540 and the Utility Gas Procurement Department transaction described below, resulted after the System Operator called upon the Utility Gas Procurement Department as a provider of last resort. SoCalGas provides the following information supporting the reasonableness of this transaction.

TC# 3540

At 11:36 a.m. on Tuesday, September 7, 2021, Gas Control requested an incremental 54,000 Dth for flow day Tuesday, September 7, 2021, (i.e., the same day; Gas Control had previously requested 36,000 Dth the evening before for flow day Tuesday, which was fulfilled by TC# 3495 and TC# 3496). As a result of a prior cycle scheduling error getting resolved, 31,000 Dth of additional supply was expected to flow and therefore reduced the incremental quantity needed to only 23,000 Dth. Text messages, phone calls, and instant messages were sent

³ See Res. G-3480, Ordering Paragraph (OP) 3.(b), which states: "Incorporates a table, in the text of the ACR, that presents the number and percent of transactions and the corresponding dollar amount and percent of total dollars that SoCalGas asserts are reasonable by nature of having met the requirements of Rule 41."

⁴ Section 13. The Utility Gas Procurement Department will act on a best-efforts basis to provide gas supplies based on the Operational Hub's request if called upon as a provider of last resort. "Provider of last resort" relates to the circumstance in which the Operational Hub has attempted to use all other available tools, has entered the open market for gas commodity purchases, has been unsuccessful in meeting its need to receive a required volume of flowing supplies at a specific location, and system reliability is therefore jeopardized. If the Operational Hub has exhausted its other options available to acquire the required flowing supplies, it will contact the Utility Gas Procurement Department and request that it provide gas to meet the remaining minimum flow requirement. Such requests will occur as soon as possible during the actual flow day. The Utility Gas Procurement Department will charge the Operational Hub the actual incremental costs incurred to provide the specific supplies. Verification that the Utility has followed this procedure will be included in the annual compliance report provided to the CPUC in conjunction with the Advice Letter addressed in Section 26 below.

to suppliers asking for offers; ten suppliers responded. Since all available supplies to the System Operator had already been purchased on the previous cycle (see description of TC# 3495 and TC# 3496 in the Section 17 discussion below), none of the suppliers had any additional SoCal Ehrenberg or SoCal Otay Mesa supply available. As a result of no available offers, SoCalGas contacted the Utility Gas Procurement Department as the provider of last resort to provide gas to meet the remaining minimum flow requirement of 23,000 Dth. The Utility Gas Procurement Department purchased 23,000 Dth at Otay Mesa, which it transported and sold to the System Operator at the citygate, net of Backbone Transportation Service (BTS) in-kind charge, for a volume of 22,962 Dth at \$35.0579 plus their net BTS charge of \$9,078.35.

Utility Gas Procurement Department Transaction

At 9:10 p.m. on Sunday, August 15, 2021, Gas Control requested 40,000 Dth for flow day Monday, August 16, 2021. On the following morning of Monday, August 16, text messages, phone calls, and instant messages were sent to suppliers asking for offers; nine suppliers responded. Due to capacity cuts resulting from an El Paso Natural Gas (EPNG) Pipeline force majeure, none of the suppliers had SoCal Ehrenberg or SoCal Otay Mesa supply available. There were also no offers on ICE. As a result of no available offers, SoCalGas contacted the Utility Gas Procurement Department as the provider of last resort. The Utility Gas Procurement Department delivered 45,000 Dth to SoCal Ehrenberg and charged the System Operator an incremental cost of \$125,112.60. Because this gas was not sold to the System Operator, a transaction confirmation number was not assigned, and this transaction is not included in the System Operator's purchase and sale activity detailed in Attachment A.

- II. Section 14 (b) of Rule No. 41: 8% of purchases were within the automatic safe harbor price limit for spot gas purchases and resales. Attachment C provides the NGI calculations to verify the reasonableness of the Section 14(b) purchases.⁵
- III. Section 15 of Rule No. 41: 48% of purchases were within the parameters for spot gas purchases described in Section 15. Attachment B shows at least 3 offers from different suppliers to affirm compliance with Section 15.
- IV. Section 17 of Rule No. 41: 37% of total purchases are reasonable pursuant to Section 17 of Rule No. 41. These six transactions are TC# 3477, TC# 3495, TC# 3496, TC# 3502, TC# 3503, and TC# 3518. Pursuant to Section 17, SoCalGas provides the following information supporting the reasonableness of these six transactions.

⁵ 14(b) *Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the intraday market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the NGI High for the current flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the NGI Low for the current flow date for the relevant trading point.*

TC# 3477 (Section 17, Rule No. 41)

At 8:35 p.m. on Thursday, August 26, 2021, Gas Control requested 26,000 Dth for flow day Friday, August 27, 2021. On the following morning of Friday, August 27, text messages, phone calls, and instant messages were sent to suppliers asking for offers; ten suppliers responded. None of the suppliers had SoCal Ehrenberg supply due to the EPNG Pipeline force majeure on August 15, 2021. There were also no offers on ICE. Only one supplier had firm gas supply available to sell at SoCal Otay Mesa. As a result of the limited options and the need for gas to support the Southern System, SoCalGas purchased the 26,000 Dth from the supplier at \$9.05/Dth.

TC# 3495, TC# 3496 (Section 17, Rule No. 41)

At 7:41 p.m. on Monday, September 6, 2021, Gas Control requested 36,000 Dth for flow day Tuesday, September 7, 2021. On the following morning of Tuesday, September 7, text messages, phone calls, and instant messages were sent to suppliers asking for offers; eleven suppliers responded. Due to the ongoing EPNG Pipeline force majeure, only one supplier had 5,000 Dth of SoCal Ehrenberg supply priced at \$10/Dth, approximately \$3.29 outside the safe harbor limit. There were no offers on ICE. Another supplier had 31,000 Dth of SoCal Otay Mesa supply priced at \$23/Dth. As a result of limited options and the need for gas to support the Southern System, the only available offers were purchased.

TC# 3502, TC# 3503 (Section 17, Rule No. 41)

At 8:43 p.m. on Tuesday, September 7, 2021, Gas Control requested 59,000 Dth for flow day Wednesday, September 8, 2021. On the following morning of Wednesday, September 8, text messages, phone calls, and instant messages were sent to suppliers asking for offers; ten suppliers responded. One supplier had 5,000 Dth of SoCal Ehrenberg supply priced at \$40/Dth, approximately \$24.33 outside the safe harbor limit. There was an offer for 5,000 Dth at \$30/Dth on ICE, but its status was not available for SoCalGas. Another supplier had 54,000 Dth of SoCal Otay Mesa supply priced at \$45/Dth. As a result of limited options and the need for gas to support the Southern System, the only available offers were purchased.

TC# 3518 (Section 17, Rule No. 41)

At 11:53 a.m. on Thursday, September 9, 2021, Gas Control requested 80,000 Dth for flow day Thursday, September 9, 2021. As a result of a prior cycle scheduling error getting resolved, 48,850 Dth of supply was expected to flow and therefore reduced the quantity needed to purchase. Text messages, phone calls, and instant messages were sent to suppliers asking for offers; eight suppliers responded. Since supplies were purchased on the previous cycle, none of the suppliers had any additional SoCal Ehrenberg supply. There were also no offers on ICE. One supplier had 31,000 Dth of SoCal Otay Mesa supply priced at \$38/Dth. As a result of the limited options and the need for gas to support the Southern System, the only available offer was purchased.

Table 1				
Southern System Purchases, Summary October 2020 through September 2021				
Rule No. 41	# Transactions	Transaction %	Purchase \$	Purchase %
Section 13 [†]	2	5	\$805,000	6%
Section 14 (b)	8	22	\$1,070,480	8%
Section 15	21	57	\$6,161,691	48%
Section 17	6	16	\$4,795,770	37%
Total	37	100	\$12,832,941	100%
[†] While there are two Section 13 transactions reported, the incremental cost of \$125,113 from one transaction is not reflected in the "Purchase \$" column and in attachments A, B, and E, as the gas was not purchased by the System Operator.				

C. Over-nomination Event Information

In Res. G-3486, the Commission approved a proposed revision to SoCalGas' Rule No. 30 to clarify the procedures used in situations where there is a system-wide over-nomination, yet additional supplies are needed on SoCalGas' Southern System. The Commission required that SoCalGas provide information concerning the impact of the Rule No. 30 revision in future ACRs. This information includes: a) the frequency of events where over-nominations occurred system-wide, yet the System Operator was required to maintain minimum flows to the Southern System; b) the effectiveness of the 10% margin of error and any need to increase or decrease the margin; and c) the observed impact on other receipt points.⁶ The referenced over-nomination event information is provided below.

a. Frequency

Because there was no procurement activity that correlated with a High Operational Flow Order (OFO) on SoCalGas' Southern System, a frequency analysis of events where over-nominations occurred system-wide, yet the System Operator was required to maintain minimum flows to the Southern System, is not applicable.

b. and c. The Margin of Error and Impact on Other Receipt Points

Because there was no procurement activity that correlated with a High OFO date on SoCalGas' Southern System, the margin of error and impact analysis is not applicable.

⁶ Res. G-3486, OP No. 2.

D. Baseload contract revision

In Res. G-3525, issued on August 11, 2017, it was ordered that:

In subsequent Annual Compliance Reports on Utility System Operator's Southern Reliability Purchases and Sales filing, SoCalGas shall inform the Commission whether there is a need to revise the conditions of the baseload contracts to reflect market or operating conditions.⁷

Since SoCalGas did not procure any baseload contracts in this period, no information is included in this AL regarding proposed changes to the structure of baseload contracts. SoCalGas may include additional recommendations when seeking reauthorization of its baseload contract tariff provision.

Attachment D provides the Southern System Reliability Request notices that were posted on SoCalGas' Electronic Bulletin Board (EBB), SoCalGas ENVOY®, in compliance with SoCalGas Rule No. 33.⁸

Confidential Attachment E provides the same information as Attachment B - details of the purchases and sales summarized in Attachment A - and adds counterparty names. These counterparty names are confidential and being submitted only to the Energy Division pursuant to the confidentiality provisions of General Order (GO) 66-D and Section 583 of the Public Utilities Code.

Conclusion

For the reasons set forth above, SoCalGas respectfully requests that the Commission approve the 2021 ACR and determine that all the transactions entered into the SRMA balance for October 1, 2020, through September 30, 2021 are reasonable and subject to amortization in customer transportation rates during 2022.

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 is November 29, 2021. 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

⁷ *Ibid.*

⁸ SoCalGas Rule No. 33, Section E: Operational and Informational Postings.

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). Due to the COVID-19 pandemic, SoCalGas is currently unable to receive protests or comments to this AL via U.S. mail or fax. Please submit protests or comments to this AL 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
E-mail: Tariffs@socalgas.com

Effective Date

The Settlement Agreement in Application (A.) 08-02-001, which was approved by Decision 09-11-006, directed that this submittal be classified as Tier 3 pursuant to GO 96-B. Therefore, SoCalGas respectfully requests that this submittal be approved on or before the Commission meeting of December 16, 2021, the same approval date requested in Advice No. 5893.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A.18-07-024, the most recent SoCalGas/SDG&E TCAP. Address change requests to the GO 96-B service list should be directed via 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 via e-mail at 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 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:

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

**DECLARATION OF MICHELLE DANDRIDGE
REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.17-09-023**

I, M. Michelle Dandridge, do declare as follows:

1. I am the Manager of Transmission and Storage Strategy, designated by Rodger R. Schwecke, Senior Vice President and Chief Infrastructure Officer for Southern California Gas Company (“SoCalGas”), to submit this declaration. I have reviewed the confidential information included within Attachment E to Advice No. 5893-A, 2021 Annual Compliance Report on Utility System Operator’s Southern System Reliability Purchases and Sales (October 1, 2020, through September 30, 2021) submitted concurrently. 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.”) D-17-09-023 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the report 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 9th day of November 2021, at Los Angeles, California.

/s/ Michelle Dandridge
M. Michelle Dandridge
Manager of Transmission and Storage Strategy

ATTACHMENT A

SoCalGas Request for Confidentiality

on the following information in the 2021 Annual Compliance Report on Utility System Operator’s Southern System Reliability Purchases and Sales

Location of Protected Information	Legal Citations	Narrative Justification
Advice No. 5893-A Attachment E (Counterparty names)	<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"> • Evid. Code § 1060 • Civil Code § 3426 et seq. <p>GO 66-D Section 2.2(b), 2.8</p> <p>D.11-01-036, 2011 WL 660568 (2011)</p>	<p>Specific trade information on volume and price in connection with the correlated counterparty (seller or buyer type) must be kept confidential pursuant to the confidentiality provisions within our trading agreements (NAESB) with third parties.</p> <p>This data is market sensitive and disclosure of it would place SoCalGas at an unfair business disadvantage. Since the net costs of these transactions (purchases and sales) are recovered in customer rates, SoCalGas’ unfair business disadvantage would also be against the public interest. If the Commission mandates the release of this information, it would expose SoCalGas’ trading parties and impact all future negotiations. Thus, the release of this non-public, confidential information would allow market participants to utilize this information to SoCalGas’ business disadvantage, and thus ratepayer disadvantage.</p>

ATTACHMENT A

Advice No. 5893-A

**Summary of Purchase Sales
Southern System Minimum Flow Purchases
October 2020 through September 2021**

**Southern System Reliability Purchases and Sales
Summary October 2020 through September 2021**

Month	Request (Dth)	Purchases				Sales		Sub-Total Net Cost \$	Transport \$ amt	Total Net Cost \$
		Quantity (Dth)	In-Kind (Dth)	Net (Dth)	\$ Amt	Quantity (Dth)	\$ Amt			
Oct-20	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Nov-20	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Dec-20	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Jan-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Feb-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Mar-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Apr-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
May-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Jun-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Jul-21	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Aug-21	246,000	96,034	157	95,877	\$1,212,290	95,877	(\$667,595)	\$544,695	\$38,486	\$583,181
Sep-21	456,700	424,647	695	423,952	\$11,620,651	423,952	(\$3,923,613)	\$7,697,038	\$170,040	\$7,867,078
Total =>	702,700	520,681	852	519,829	\$12,832,941	519,829	(\$4,591,208)	\$8,241,733	\$208,526	\$8,450,259

ATTACHMENT B

Advice No. 5893-A

Transactions, Public

Southern System Reliability Purchase/Sale

August 2021 Activity

Notification Minimum Flow				PURCHASE									SALE					Net \$ \$Purchase minus \$Sale	
Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt (Dths)	inkind .164%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge	Flow Date	TC#	Amt (Dths)	Sale Price \$/dth	Rule 41 Section		\$Amt
8/26/21	8/27/21	3	26,000	3477	OTAY	26,000	43	25,957	\$9.0500	17	\$235,300.00	\$10,419	8/27/21	3478	7,500	\$7.0500	14(b)	\$52,875.00	
													8/27/21	3479	500	\$7.0500	14(b)	\$3,525.00	
8/27/21	8/28/21	2	66,000	3482	EHR	5,738	9	5,729	\$8.0000	15	\$45,904.00	\$2,300	8/27/21	3480	3,500	\$7.0500	14(b)	\$24,675.00	
				3483	EHR	0	0	0	\$7.0000	14(b)	\$0.00	\$0	8/27/21	3481	0	\$7.0500	14(b)	\$0.00	
				3484	OTAY	10,000	16	9,984	\$22.0500	15	\$220,500.00	\$4,008							
													8/30/21	3485	12,000	\$7.0500	14(b)	\$84,600.00	
8/27/21	8/29/21	1	66,000	3482	EHR	4,732	8	4,724	\$8.0000	15	\$37,856.00	\$1,896	8/30/21	3486	10,000	\$7.0000	14(b)	\$70,000.00	
				3483	EHR	0	0	0	\$7.0000	14(b)	\$0.00	\$0	8/31/21	3488	22,000	\$7.0000	14(b)	\$154,000.00	
				3484	OTAY	10,000	16	9,984	\$22.0500	15	\$220,500.00	\$4,008	8/31/21	3489	7,500	\$6.8600	14(b)	\$51,450.00	
8/27/21	8/30/21	1	66,000	3482	EHR	20,000	33	19,967	\$8.0000	15	\$160,000.00	\$8,015	8/31/21	3490	7,500	\$6.8600	14(b)	\$51,450.00	
				3483	EHR	0	0	0	\$7.0000	14(b)	\$0.00	\$0	8/31/21	3491	7,500	\$6.8600	14(b)	\$51,450.00	
				3484	OTAY	10,000	16	9,984	\$22.0500	15	\$220,500.00	\$4,008	8/31/21	3492	7,500	\$6.8600	14(b)	\$51,450.00	
													8/31/21	3493	10,377	\$6.9500	14(b)	\$72,120.15	
8/30/21	8/31/21	3	22,000	3487	EHR	9,564	16	9,548	\$7.5000	14(b)	\$71,730.00	\$3,833							
Total for August			246,000			96,034	157	95,877			\$1,212,290	\$38,486			95,877			\$667,595	\$583,180.84

Southern System Reliability Purchase/Sale

September 2021 Activity

Notification Minimum Flow				PURCHASE									SALE					Net \$ \$Purchase minus \$Sale
Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt (Dth)	inkind .164%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge	Flow Date	TC#	Amt (Dth)	Sale Price \$/dth	Rule 41 Section	
9/6/21	9/7/21	3	36,000	3495	EHR	3,947	6	3,941	\$10.0000	17	\$39,470	\$1,582	9/8/21	3497	1,000	\$13.9500	14(a)	\$13,950
				3496	OTAY	31,000	51	30,949	\$23.0000	17	\$713,000	\$12,423	9/8/21	3498	4,000	\$13.9500	14(a)	\$55,800
													9/8/21	3499	2,500	\$14.0000	14(a)	\$35,000
9/7/21	9/7/21	4	54,000	3540	OTAY	23,000	38	22,962	\$35.0579	13	\$805,000	\$9,078	9/8/21	3500	7,500	\$14.0000	14(a)	\$105,000
													9/8/21	3501	7,500	\$14.0000	14(a)	\$105,000
9/7/21	9/8/21	3	59,000	3502	EHR	5,000	8	4,992	\$40.0000	17	\$200,000	\$2,004	9/9/21	3504	4,000	\$20.0000	14(a)	\$80,000
				3503	OTAY	54,000	89	53,911	\$45.0000	17	\$2,430,000	\$21,640	9/9/21	3505	1,000	\$20.0000	14(a)	\$20,000
													9/9/21	3506	5,000	\$20.0000	14(a)	\$100,000
9/8/21	9/9/21	3	88,000	3512	EHR	16,800	28	16,772	\$25.0000	14(b)	\$420,000	\$6,732	9/9/21	3507	10,000	\$18.5550	14(a)	\$185,550
				3513	EHR	5,000	8	4,992	\$29.0000	14(b)	\$145,000	\$2,004	9/8/21	3508	10,000	\$12.7500	14(b)	\$127,500
				3514	EHR	17,350	28	17,322	\$25.0000	14(b)	\$433,750	\$6,953	9/8/21	3509	5,000	\$13.0000	14(b)	\$65,000
				3515	OTAY	48,850	80	48,770	\$35.0000	15	\$1,709,750	\$19,577	9/8/21	3510	5,000	\$13.0000	14(b)	\$65,000
													9/8/21	3511	5,000	\$13.0000	14(b)	\$65,000
9/9/21	9/9/21	4	31,000	3518	OTAY	31,000	51	30,949	\$38.0000	17	\$1,178,000	\$12,423	9/10/21	3516	50,000	\$9.8900	14(a)	\$494,500
													9/10/21	3517	5,000	\$10.0300	14(a)	\$50,150
9/9/21	9/10/21	3	67,000	3522	EHR	8,000	13	7,987	\$18.0000	15	\$144,000	\$3,206	9/11-13	3521	119,968	\$7.3350	14(a)	\$879,965

Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt (Dths)	inkind .164%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge	Flow Date	TC#	Amt (Dths)	Sale Price \$/dth	Rule 41 Section	\$Amt	Net \$ \$Purchase minus \$Sale
				3523	EHR	25,000	41	24,959	\$18.0000	15	\$450,000	\$10,019	9/10/21	3526	19,998	\$9.0000	14(b)	\$179,982	
				3524	EHR	21,000	34	20,966	\$18.0000	15	\$378,000	\$8,416	9/10/21	3528	10,000	\$9.2700	14(b)	\$92,700	
				3525	OTAY	13,000	21	12,979	\$38.0000	15	\$494,000	\$5,210	9/10/21	3529	10,000	\$9.2700	14(b)	\$92,700	
													9/14/21	3533	5,000	\$7.9600	14(a)	\$39,800	
9/10/21	9/10/21	4	21,700	3527	EHR	21,700	36	21,664	\$17.7500	15	\$385,175	\$8,696	9/14/21	3534	4,997	\$7.9600	14(a)	\$39,776	
			Not Purchased			5,000	0	0	\$18.0000	15			9/13/21	3535	10,000	\$8.1000	14(b)	\$81,000	
			Not Purchased			21,700	0	0	\$38.0000	15									
9/10/21	9/11/21	2	24,000	3530	EHR	6,000	10	5,990	\$12.0000	15	\$72,000	\$2,404	9/15/21	3536	50,000	\$7.9600	14(a)	\$398,000	
				3531	EHR	5,000	8	4,992	\$14.7500	15	\$73,750	\$2,004	9/14/21	3541	1,500	\$8.5000	14(b)	\$12,750	
				3532	OTAY	13,000	21	12,979	\$35.0000	15	\$455,000	\$5,210	9/14/21	3542	6,000	\$8.5000	14(b)	\$51,000	
9/10/21	9/12/21	1	24,000	3530	EHR	6,000	10	5,990	\$12.0000	15	\$72,000	\$2,404	9/14/21	3543	7,500	\$8.5000	14(b)	\$63,750	
				3531	EHR	5,000	8	4,992	\$14.7500	15	\$73,750	\$2,004	9/16/21	3544	10,000	\$8.1750	14(a)	\$81,750	
				3532	OTAY	13,000	21	12,979	\$35.0000	15	\$455,000	\$5,210	9/15/21	3545	7,500	\$8.9000	14(b)	\$66,750	
													9/15/21	3546	2,500	\$8.9000	14(b)	\$22,250	
9/13/21	9/14/21	3	52,000	3537	EHR	22,497	37	22,460	\$9.0000	15	\$202,473	\$9,016	9/15/21	3547	5,000	\$9.0000	14(b)	\$45,000	
				3538	EHR	22,000	36	21,964	\$9.5000	15	\$209,000	\$8,817	9/15/21	3548	4,866	\$9.0000	14(b)	\$43,794	
				3539	EHR	7,503	12	7,491	\$11.0000	15	\$82,533	\$3,007	9/24/21	3549	26,623	\$6.2050	14(a)	\$165,196	

Total for September

456,700

424,647

695

423,952

\$11,620,651

\$170,040

423,952

\$3,923,613

\$7,867,078

Grand Total

702,700

520,681

852

519,829

12,832,941

208,526

519,829

4,591,208

8,450,258

Rule 41	# Transactions	Transaction %	Purchase \$	Purchase %
Section 13	1	3	\$ 805,000	6.3%
Section 14 (b)	8	22	\$ 1,070,480	8.3%
Section 15	21	58	\$ 6,161,691	48.0%
Section 17	6	17	\$ 4,795,770	37.4%
Total	36	100	\$ 12,832,941	100.0%

ATTACHMENT C

Advice No. 5893-A

Ice Prices

<u>Date</u>	PURCHASE (SoCal - Ehrenberg)			SALE (SoCal - Citygate)		
	Rule 41, Sec 14 a/b	<u>NGI \$/dth</u>	<u>110%</u>	Rule 41, Sec 14 a/b	<u>NGI \$/dth</u>	<u>90%</u>
8/27/2021	Sec 14 (a) Wtd Avg	\$7.1200	\$7.8320	Sec 14 (a) Wtd Avg	\$7.2300	\$6.5070
	Sec 14 (b) High	\$7.2200	\$7.9420	Sec 14 (b) Low	\$7.1000	\$6.3900
8/28-30/2021	Sec 14 (a) Wtd Avg	\$6.9050	\$7.5955	Sec 14 (a) Wtd Avg	\$6.7750	\$6.0975
	Sec 14 (b) High	\$7.2500	\$7.9750	Sec 14 (b) Low	\$6.5000	\$5.8500
8/31/2021	Sec 14 (a) Wtd Avg	\$6.9350	\$7.6285	Sec 14 (a) Wtd Avg	\$6.8700	\$6.1830
	Sec 14 (b) High	\$7.1500	\$7.8650	Sec 14 (b) Low	\$6.7000	\$6.0300
9/7/2021	Sec 14 (a) Wtd Avg	\$5.9300	\$6.5230	Sec 14 (a) Wtd Avg	\$5.9900	\$5.3910
	Sec 14 (b) High	\$6.1000	\$6.7100	Sec 14 (b) Low	\$5.8500	\$5.2650
9/8/2021	Sec 14 (a) Wtd Avg	\$12.0850	\$13.2935	Sec 14 (a) Wtd Avg	\$11.5600	\$10.4040
	Sec 14 (b) High	\$14.2500	\$15.6750	Sec 14 (b) Low	\$7.4500	\$6.7050
9/9/2021	Sec 14 (a) Wtd Avg	\$23.4850	\$25.8335	Sec 14 (a) Wtd Avg	\$20.0550	\$18.0495
	Sec 14 (b) High	\$27.0000	\$29.7000	Sec 14 (b) Low	\$14.0000	\$12.6000
9/10/2021	Sec 14 (a) Wtd Avg	\$11.0400	\$12.1440	Sec 14 (a) Wtd Avg	\$9.8900	\$8.9010
	Sec 14 (b) High	\$12.0500	\$13.2550	Sec 14 (b) Low	\$8.5000	\$7.6500
9/11-13/21	Sec 14 (a) Wtd Avg	\$7.6550	\$8.4205	Sec 14 (a) Wtd Avg	\$7.3350	\$6.6015
	Sec 14 (b) High	\$7.9000	\$8.6900	Sec 14 (b) Low	\$6.2500	\$5.6250
9/14/2021	Sec 14 (a) Wtd Avg	\$7.9200	\$8.7120	Sec 14 (a) Wtd Avg	\$7.8600	\$7.0740
	Sec 14 (b) High	\$8.0000	\$8.8000	Sec 14 (b) Low	\$7.7000	\$6.9300
9/15/2021	Sec 14 (a) Wtd Avg	\$8.0200	\$8.8220	Sec 14 (a) Wtd Avg	\$7.9600	\$7.1640
	Sec 14 (b) High	\$8.2000	\$9.0200	Sec 14 (b) Low	\$7.5000	\$6.7500
9/16/2021	Sec 14 (a) Wtd Avg	\$8.0250	\$8.8275	Sec 14 (a) Wtd Avg	\$8.0250	\$7.2225
	Sec 14 (b) High	\$8.1500	\$8.9650	Sec 14 (b) Low	\$7.9300	\$7.1370
9/24/2021	Sec 14 (a) Wtd Avg		\$0.0000	Sec 14 (a) Wtd Avg		\$0.0000
	Sec 14 (b) High		\$0.0000	Sec 14 (b) Low		\$0.0000

Sec 14 (a) applies to purchases/sales made in the day-ahead market
Sec 14 (b) applies to purchases/sales made in the intraday market

ATTACHMENT D

Advice No. 5893-A

**Requests to the Operational Hub for Additional
Supplies to Meet Southern System Minimum Flow Requirements**



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System (Ehrenberg)

Quantity Requested: 42,000 DTH

Flow Date(s) Requested: August 16, 2021

Time of Request: 09:10:00 pm August 15, 2021

Reason for Request: Southern System scheduled quantities are currently 15,000 DTH below the southern system minimum flowing supply requirement. There is also uncertainty as to whether the unplanned upstream pipeline outage will result in additional cuts for the 08/16/21 gas day.



Southern System Reliability Transaction Posting for August 16, 2021

Purpose: SoCalGas' System Operator requested Gas Acquisition to acquire gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 13 to ensure system reliability.

Transaction 1

Price: \$2.78 per Dth plus .164% fuel

Quantity: 45,000 Dth

Flow Date: August 16th, 2021

Delivery Receipt Point: Ehrenberg

Special Terms: None



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 26,000 DTH

Flow Date(s) Requested: August 27, 2021

Time of Request: 08:35:00 pm August 26, 2021

Reason for Request: Southern System scheduled quantities are currently 26,000 DTH below the southern system minimum flowing supply requirement



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 66,000 DTH

Flow Date(s) Requested: August 28, 2021, August 29, 2021, August 30, 2021

Time of Request: 12:50:00 pm August 27, 2021

Reason for Request: Southern System scheduled quantities are expected to be 66,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 22,000 DTH

Flow Date(s) Requested: August 31, 2021

Time of Request: 07:45:00 pm August 30, 2021

Reason for Request: Southern System scheduled quantities are currently 22,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 36,000 DTH

Flow Date(s) Requested: September 7, 2021

Time of Request: 07:41pm September 6, 2021

Reason for Request: Southern System scheduled quantities are expected to be 36,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 54,000 DTH

Flow Date(s) Requested: September 7, 2021

Time of Request: 11:36am September 7, 2021

Reason for Request: Southern System scheduled quantities are expected to be 54,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 59,000 DTH

Flow Date(s) Requested: September 8, 2021

Time of Request: 08:43pm September 7, 2021

Reason for Request: Southern System scheduled quantities are expected to be 59,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Transaction Posting for September 7, 2021

Purpose: SoCalGas' System Operator requested Gas Acquisition to provide gas supplies as the "provider of last resort" per SoCalGas Tariff Rule No. 41, paragraph 13 to support Southern System reliability.

Transaction Details

Price: \$35.39 per Dth plus 0.164% fuel

Quantity: 23,000 Dth

Flow Date: September 7, 2021

Delivery Receipt Point: Otay Mesa

Special Terms: None



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 88,000 DTH

Flow Date(s) Requested: September 9, 2021

Time of Request: 08:37pm September 8, 2021

Reason for Request: Southern System scheduled quantities are expected to be 88,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 80,000 DTH

Flow Date(s) Requested: September 9, 2021

Time of Request: 11:53am September 9, 2021

Reason for Request: Southern System scheduled quantities are expected to be 80,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 67,000 DTH

Flow Date(s) Requested: September 10, 2021

Time of Request: 08:11pm September 9, 2021

Reason for Request: Southern System scheduled quantities are expected to be 67,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 21,700 DTH

Flow Date(s) Requested: September 10, 2021

Time of Request: 11:29:00 am September 10, 2021

Reason for Request: Southern System scheduled quantities are expected to be 21,700 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 24,000 DTH

Flow Date(s) Requested: September 11, 2021 & September 12, 2021

Time of Request: 01:25:00 pm September 10, 2021

Reason for Request: Southern System scheduled quantities are expected to be 24,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Transmission & Storage Strategy acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 52,000 DTH

Flow Date(s) Requested: September 14, 2021

Time of Request: 08:05pm September 13, 2021

Reason for Request: Southern System scheduled quantities are expected to be 52,000 DTH below the southern system minimum flowing supply requirement.

ATTACHMENT E

Advice No. 5893-A

Transactions, Confidential

**Confidential and Protected Materials
Pursuant to Public Utilities Code Section 583,
General Order 66-D, and D.17-09-023**