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October 10, 2023

Advice No. 6204-G
(U 904 G)

Public Utilities Commission of the State of California

Subject: Revisions to Rule No. 30 – Transportation of Customer Owned Gas

Southern California Gas Company (SoCalGas) hereby submits for California Public Utilities Commission (Commission) approval revisions to its tariffs, applicable throughout its service territory, as shown on Attachment A.

Purpose

This Advice Letter (AL) proposes revisions to SoCalGas Rule No. 30 pursuant to the September 15, 2023 letter from the Deputy Executive Director for Energy and Climate Policy/ Director of CPUC Energy Division removing the Aliso Canyon Withdrawal Protocol (Withdrawal Protocol).¹

Background

In a letter from the Deputy Executive Director for Energy and Climate Policy/ Director of CPUC Energy Division dated September 15, 2023, the Aliso Canyon Withdrawal Protocol (Withdrawal Protocol) was removed. The September 15, 2023 letter further noted that on August 31, 2023, the California Public Utilities Commission (CPUC) voted in Decision (D.23-08-050) to increase the interim storage limit at the Aliso Canyon natural gas storage facility in order to protect natural gas and electricity customers from reliability and economic impacts during winter 2023-2024. As part of the implementation of that decision, and to further mitigate high gas prices, the CPUC Energy Division's September 15, 2023 letter removed the Withdrawal Protocol.

The Withdrawal Protocol limited the use of Aliso Canyon storage to days when certain conditions are met. The system must be under some strain and gas customers may reach the point where they are subject to financial penalties for not delivering sufficient gas before Aliso Canyon can be used. D.23-08-050 concluded that restrictions on Aliso Canyon

¹ [CPUC Letterhead \(Brown\) \(ca.gov\)](#)

contributed to last year's natural gas price spikes and that removal of the Commission's storage level limitation provides a significant tool to mitigate future gas price spikes. To effectively implement D.23-08-050, the Energy Division removed the Withdrawal Protocol to allow customers increased flexibility to use Aliso Canyon to moderate gas and electricity prices.

The most recent version of the Withdrawal Protocol was put in place by the Deputy Executive Director of Energy Division in July 2019, with additional noticing requirements added in April 2020. The Withdrawal Protocol required that specified information be posted to SoCalGas' electronic bulletin board, ENVOY, and/or submitted to Energy Division for days when the protocol was met. When the Withdrawal Protocol was last revised, this information was not available elsewhere. At CPUC request, SoCalGas began posting the daily gas storage levels for each of its four gas storage facilities on ENVOY on June 29, 2021. Since this information is now publicly available, it is no longer necessary to require additional informational postings as previously required under the Withdrawal Protocol.

Tariff Revisions

As a result of the removal of the Withdrawal Protocol, SoCalGas has identified the need to revise SoCalGas Rule No. 30, Transportation of Customer Owned Gas, to delete footnote 1 on Sheet 13 of Rule No. 30 which references Aliso Canyon withdrawal capacity.

In addition, SoCalGas proposes some clean-up revisions to Sheets 3, 4 and 5 to make clarifying changes, correct inadvertent errors, and remove obsolete information.

SoCalGas's tariff with these revisions are shown in Attachment A.

Protests

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 submitted electronically and must be received within 20 days after the date of this Advice Letter, which is October 30, 2023. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: EDTariffUnit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this Advice Letter should also be sent electronically to the attention of:

Attn: Gary Lenart
Regulatory Tariff Manager
E-mail: GLenart@socalgas.com
E-mail: Tariffs@socalgas.com

Effective Date

SoCalGas asserts this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal become effective November 9, 2023, which is 30 calendar days after the date submitted.

Notice

A copy of this AL is being sent to SoCalGas' General Order (GO) 96-B service list and the Commission's service list in I.17-02-002. Address change requests to the GO 96-B service list should be directed via e-mail to Tariffs@socalgas.com or call 213-244-2424. 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: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ATTACHMENT A
Advice No. 6204-G

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 61206-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 3	Revised 58999-G
Revised 61207-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 4	Revised 59000-G
Revised 61208-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 5	Revised 59001-G
Revised 61209-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 13	Revised 59845-G
Revised 61210-G	TABLE OF CONTENTS	Revised 61065-G
Revised 61211-G	TABLE OF CONTENTS, Sheet 1	Revised 61205-G

Rule No. 30

Sheet 3

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

D. Operational Requirements (Continued)

2. Receipt Points

Utility accepts nominations from transportation customers or their representatives at the following Receipt Points into the SoCalGas system, as referenced in Schedule No. G-BTS*:

- El Paso Pipeline at Blythe (Southern Transmission Zone)
- North Baja Pipeline at Blythe (Southern Transmission Zone)
- Transportadora de Gas Natural de Baja California at Otay Mesa (Southern Transmission Zone)
- California Producer – South Desert (Southern Transmission Zone)
- Kern River Pipeline and Mojave Pipeline (Wheeler Transmission Zone)
- PG&E at Kern River Station (Wheeler Transmission Zone)
- Occidental of Elk Hills at Gosford (Wheeler Transmission Zone)
- California Producer – Wheeler Ridge (Southern Transmission Zone)
- Transwestern Pipeline at North Needles (Northern Transmission Zone)
- Transwestern Pipeline at Topock (Northern Transmission Zone)
- El Paso Pipeline at Topock (Northern Transmission Zone)
- Kern River Pipeline and Mojave Pipeline at Kramer Junction (Northern Transmission Zone)
- California Producer – North Desert (Southern Transmission Zone)
- Line 85 (California Supply)
- North Coastal (California Supply)
- Other (California Supply)
- Storage

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* Additional Receipt Points will be added as they are established in the future.

3. Backbone Transmission Capacity

Each day, Receipt Point and Backbone Transmission Zone capacities will be set at their physical operating maximums under the operating conditions for that day. The Utility will schedule nominations for each Receipt Point and Backbone Transmission Zone to the maximum operating capacity of that individual Receipt Point or Backbone Transmission Zone. The maximum operating capacity is defined as the facility design or contractual limitation to deliver gas into the Utility’s system adjusted for operational constraints (i.e. maintenance, localized restrictions, and upstream delivery pressures) as determined each day.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 6204-G
 DECISION NO. 23-08-050

ISSUED BY

(TO BE INSERTED BY CAL. PUC)
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Rule No. 30

Sheet 4

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

D. Operational Requirements (Continued)

3. Backbone Transmission Capacity (Continued)

The NAESB elapsed pro rata rules require that the portion of the scheduled quantity that would have theoretically flowed up to the effective time of the intraday nomination be confirmed, based upon a cumulative uniform hourly quantity for each nomination period affected. As such, the scheduled quantities for each shipper are subject to change in the Intraday 1 Cycle, the Intraday 2 Cycle, and the Intraday Cycle 3. However, each shipper’s resulting scheduled quantity for the Gas Day will be no less than the elapsed prorated scheduled quantity for that shipper.

Each day, the Utility will use the following rules to confirm nominations to the Receipt Point and Backbone Transmission Zone maximum operating capacities. The Utility will also use the following rules to confirm nominations to the system capacity limitation as defined in Section F for OFO events during the Intraday 1, Intraday 2, and Intraday 3 cycles; and during the Intraday 3 cycle when an OFO event is not called and nominations exceed system capacity.

Confirmation Order:

- Nominations using Firm Primary backbone transportation rights will be first; pro-rated if over-nominated*.
- Nominations using Firm Alternate backbone transportation rights within the associated transmission zone will be second (“Firm Alternate Within-the-Zone”); pro-rated if over-nominated.
- Nominations using Firm Alternate backbone transportation rights outside the associated transmission zone will be third (“Firm Alternate Outside-the-Zone”); pro-rated if over-nominated.
- Nominations using Interruptible backbone transportation rights will be fourth, pro-rated if over-nominated.
- Southern Transmission Receipt Points will not be reduced in any cycle below 110% of the Southern System minimum flowing supply requirement established by the Gas Control Department.

Bumping Rules:

- Firm Primary rights can “bump” any Firm Alternate scheduled quantities through the Intraday 2 Cycle subject to the NAESB elapsed pro-rata rules.
- Firm Alternate Within-the-Zone rights can “bump” Firm Alternate Outside-the-Zone scheduled quantities through the Intraday 2 Cycle subject to the NAESB elapsed pro-rata rules.
- Firm Primary and any Firm Alternate can “bump” interruptible scheduled quantities through the Intraday 2 Cycle subject to the NAESB elapsed pro-rata rules.
- Bumping will not be allowed in the Intraday 3 Cycle.

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Rule No. 30

Sheet 5

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

D. Operational Requirements (Continued)

3. Backbone Transmission Capacity (Continued)

If the available firm capacity at a particular receipt point or within a particular transmission zone is less than the firm capacity figures stated in Schedule No. G-BTS, scheduling of firm backbone transportation capacity nominations will be pro rata within each scheduling cycle. Any nominations of firm backbone transportation rights acquired through the addition of Displacement Backbone Transmission Capacity facilities will be reduced pro rata to zero at the applicable receipt point or within the applicable transmission zone prior to other firm backbone transportation rights nominations being reduced.

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Priority Rules:

- a. Firm primary scheduled quantities in the Evening Cycle will have priority over a new firm primary nomination made in the Intraday 1 Cycle.
- b. Firm Alternate Inside-the-Zone scheduled quantities in the Evening Cycle will have priority over a new Firm Alternate Inside-the-Zone nomination made in the Intraday 1 Cycle.
- c. Firm Alternate Outside-the-Zone scheduled quantities in the Evening Cycle will have priority over a new Firm Alternate Outside-the-Zone nomination made in the Intraday 1 Cycle.
- d. Interruptible scheduled quantities in the Evening Cycle will have priority over a new Interruptible nomination made in the Intraday 1 Cycle.
- e. This same structure will be applied in going from Intraday 1 Cycle (Cycle 3) to Intraday 2 Cycle (Cycle 4) to Intraday 3 Cycle (Cycle 5). However, this hierarchy will not affect Intraday 4 Cycle (Cycle 6) nominations or the elapsed pro-rata rule.

4. Storage Service Capacity

Each day, storage injection and withdrawal capacities will be set at their physical operating maximums under the operating conditions for that day and posted on the Utility's EBB. *Injection nominations will be held to the injection capacity specified in the Operational Flow Order (OFO) calculation on the EBB in every flowing cycle regardless of OFO status.** The Utility will use the following rules to limit the nominations to the storage maximums.

As necessary, available withdrawal or injection capacities will be prorated to the core and daily balancing functions based on the maximum authorized withdrawal or injection capacities, as detailed in Decision (D.) 20-02-045.

- Nominations using Firm storage rights will have the highest priority, pro-rated, if necessary to the available storage capacity.
- All other nominations using Interruptible storage rights will have the lowest priority, pro-rated if over-nominated based on the daily volumetric price paid.

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Rule No. 30

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Operational Flow Orders and Emergency Flow Orders

1. Operational Flow Order (OFO)

- a. The Utility System Operator’s protocol for declaring an Operational Flow Order (OFO) is described in Rule No. 41. All OFO declarations will be identified by stage that will specify a Daily Imbalance Tolerance and Noncompliance Charge per the table below. The daily balancing standby rate is not applicable to High OFOs. Pursuant to D.22-04-042, the eight-stage OFO Noncompliance Charge structure shall be in effect year-round, unless conditions warrant a temporary change to the five-stage structure not to exceed 120 days, which would be implemented through an Advice Letter submission to the Commission.

Effective if Ordered

Stage	Daily Imbalance Tolerance	Noncompliance Charge (\$/therm)
1	Up to +/-25%	0.025
2	Up to +/-20%	0.10
3	Up to +/-15%	0.50
4	Up to +/-5%	0.50
5	Up to +/-5%	0.50 plus Rate Schedule G-IMB daily balancing standby rate
EFO	Zero	5.00 plus Rate Schedule G-IMB daily balancing standby rate

Effective Year-Round

Stage	Daily Imbalance Tolerance	Noncompliance Charge (\$/therm)
1	Up to +/-25%	0.025
2	Up to +/-20%	0.10
3	Up to +/-15%	0.50
3.1	Up to +/-15%	1.00
3.2	Up to +/-15%	1.50
3.3	Up to +/-15%	2.00
4	Up to +/-5%	2.50
5	Up to +/-5%	2.50 plus Rate Schedule G-IMB daily balancing standby rate
EFO	Zero	5.00 plus Rate Schedule G-IMB daily balancing standby rate

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