

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 6219G
As of April 10, 2024

Subject: 2023 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (October 1, 2022, through September 30, 2023)

Division Assigned: Energy

Date Filed: 11-01-2023

Date to Calendar: 11-10-2023

Authorizing Documents: D0911006

Authorizing Documents: G-3480

Disposition:

Signed

Effective Date:

03-21-2024

Resolution Required: Yes

Resolution Number: G-3604

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Lenart Lenart

(213) 244-2424

Tariffs@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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



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 1, 2023

Advice No. 6219-G
(U 904 G)

Public Utilities Commission of the State of California

Subject: 2023 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales (October 1, 2022, through September 30, 2023)

Southern California Gas Company (SoCalGas) hereby submits to the California Public Utilities Commission (Commission or CPUC) this advice letter (AL) of its 2023 Annual Compliance Report (ACR) to demonstrate that activities to maintain Southern System reliability from October 1, 2022, through September 30, 2023, are in compliance with the standards, criteria, and procedures described in Sections 10 through 20 of SoCalGas Rule No. 41.

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 2023 ACR for the period October 1, 2022, through September 30, 2023. SoCalGas believes that all of the transactions described in this ACR are reasonable and subject to amortization in customer transportation rates during 2024.

A. Transaction Overview

As shown in Attachment A, from October 1, 2022, through September 30, 2023, SoCalGas spent \$12,700,089 to help satisfy the Southern System minimum flow requirements. SoCalGas purchased 1,206,708 Dth (net of in-kind fuel) of gas at Southern System receipt points (i.e., Ehrenberg and Otay Mesa) for \$53,655,811.

This gas was then resold at the SoCal Citygate for \$41,407,173 for a net loss of \$12,248,637. In addition to this net purchase loss, the System Operator incurred \$451,451 in transportation charges.

Therefore, the total net cost SoCalGas incurred to help satisfy Southern System minimum flow requirements from October 1, 2022, through September 30, 2023, was \$12,700,089.

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).

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 2022 through September 2023. In compliance with Res. G-3480, Table 1 below presents the number and percent of purchase transactions, the corresponding dollar amount, and percent of total dollars for each section of Rule No. 41.³ The transactions are classified into the two sections of Rule No. 41, "Purchases and Sales to Manage Minimum Flow Supplies," as follows:

Table 1				
Southern System Purchases, Summary October 2022 through September 2023				
Rule No. 41	# Transactions	Transaction %	Purchase \$	Purchase %
Section 14(b)	21	47%	\$19,855,815	37%
Section 15	24	53%	\$33,799,996	63%
Total	45	100%	\$53,655,811	100%

- I. Section 14(b) of Rule No. 41: 47% of purchases were within the automatic safe harbor price limit for spot gas purchases. Confidential Attachment C provides the Natural Gas Intelligence (NGI) calculations to verify the reasonableness of the Section 14(b) purchases.⁴ NGI Daily Cash Market Prices must be kept confidential pursuant to the provisions within SoCalGas' license agreement with NGI and are 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.
- II. Section 15 of Rule No. 41: 53% of purchases were within the parameters for spot gas purchases described in Section 15. Attachment B shows the System Operator secured offers from at least three different suppliers in compliance with Section 15.⁵

³ Res. G-3480 at Ordering Paragraph (OP) 3.(b).

⁴ SoCalGas Rule No. 41, Section 14(b), states "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."

⁵ SoCalGas Rule No. 41, Section 15, states "Purchases or sales at prices that are outside the ranges specified in Section 14 (a) and (b) above shall nevertheless be deemed reasonable if the Operational Hub abides by the following procedure: When the Gas Control Department determines that spot purchases are necessary to meet minimum flow requirements, the Operational Hub shall monitor ICE and record the relevant price information, if available, for deliveries of gas at all relevant trading points. If volumes available on ICE meet or exceed the minimum flow requirements, transactions for the volumes offered through ICE shall be deemed

Table 2 below presents the number and percent of sale transactions, the corresponding dollar amount, and percent of total dollars for each section of Rule No. 41.⁶ The transactions are classified into the two sections of Rule No. 41, “Purchases and Sales to Manage Minimum Flow Supplies,” as follows:

Table 2				
Southern System Sales, Summary October 2022 through September 2023				
Rule No. 41	# Transactions	Transaction %	Sale \$	Sale %
Section 14(a)	55	95%	\$40,659,598	98%
Section 14(b)	3	5%	\$747,575	2%
Total	58	100%	\$41,407,173	100%

- I. Section 14(a) of Rule No. 41: 95% of sales were within the automatic safe harbor price limit for spot gas sales. Confidential Attachment C provides the NGI calculations to verify the reasonableness of the Section 14(a) sales.⁷
- II. Section 14(b) of Rule No. 41: 5% of sales were within the automatic safe harbor price limit for spot gas sales. Confidential Attachment C provides the NGI calculations to verify the reasonableness of the Section 14(b) sales.⁸

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

reasonable. The Operational Hub may also post an offer/bid on ICE for volumes. When less than the required volumes are available on ICE, the Operational Hub shall contact gas suppliers (other than the Utility Gas Procurement Department or affiliates), request offers for the necessary supplies, and record their offers for gas delivered to the relevant trading points to ensure at least three offers from three different suppliers are available for comparison. The Operational Hub shall compare prices posted on ICE and, if applicable, prices quoted by its supplier contacts, and select the best prices available to meet the quantities required to meet minimum flow requirements. Verification that the Operational Hub has followed this procedure shall be provided to the CPUC in the Annual Compliance Report described in Section 26 below.”

⁶ Res. G-3480 at OP 3.(b).

⁷ SoCalGas Rule No. 41, Section 14(a), states “Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the day-ahead 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 Natural Gas Intelligence (NGI) Avg Index for the 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 Avg Index for the flow date for the relevant trading point.”

⁸ See footnote 4.

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.⁹

No minimum reliability purchases were needed on SoCalGas' Southern System during any system-wide over-nomination days from October 1, 2022, to September 30, 2023.

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.¹⁰

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. 33.¹¹

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 2023 ACR and determine that all the transactions entered into the SRMA balance for October 1, 2022, through September 30, 2023 are reasonable and subject to amortization in customer transportation rates during 2024.

Protest

⁹ Res. G-3486 at OP 2.

¹⁰ Res. G-3525 at OP 2.

¹¹ SoCalGas Rule No. 33, Section E: Operational and Informational Postings.

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 21, 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 AL 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

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 14, 2023.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A.22-09-015, the most recent SoCalGas/SDG&E Cost Allocation Proceeding. 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:

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

**DECLARATION OF MICHELLE DANDRIDGE
REGARDING CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO D.21-09-020**

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 C and Attachment E to Advice No. 6219, 2023 Annual Compliance Report on Utility System Operator’s Southern System Reliability Purchases and Sales (October 1, 2022, through September 30, 2023) 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-21-09-020 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 1st day of November 2023, at Los Angeles, California.



M. Michelle Dandridge
Manager of Transmission and Storage Strategy

ATTACHMENT A

SoCalGas Request for Confidentiality

on the following information in the 2023 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales

Location of Protected Information	Legal Citations	Narrative Justification
Advice No. 6219 Attachment C (NGI Daily Cash Market Prices)	D.11-01-036, 2011 WL 660568 (2011)	NGI's Daily Cash Market Prices must be kept confidential pursuant to the provisions within SoCalGas' license agreement with NGI.

ATTACHMENT A (CONT.)

SoCalGas Request for Confidentiality

on the following information in the 2023 Annual Compliance Report on Utility System Operator's Southern System Reliability Purchases and Sales

Location of Protected Information	Legal Citations	Narrative Justification
Advice No. 6219 Attachment E (Counterparty names)	<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 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. 6219-G

Summary of Purchase Sales
Southern System Minimum Flow Purchases
October 2022 through September 2023

**Southern System Reliability Purchases and Sales
Summary October 2022 through September 2023**

Month	Request (Dth)	Purchases				Sales		Sub-Total Net Cost \$	Transport \$ Amt	Total Net Cost \$
		Amt scheduled (Dth)	In-Kind (Dth)	Net Amt flowed (Dth)	\$ Amt	Amt Sold (Dth)	\$ Amt			
Oct-22	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Nov-22	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Dec-22	1,182,000	1,168,967	3,156	1,165,811	\$53,389,311	1,032,188	\$38,133,209	\$15,256,102	\$428,995	\$15,685,097
Jan-23	0	0	0	0	\$0	133,623	\$2,705,496	-\$2,705,496	\$0	-\$2,705,496
Feb-23	41,000	41,000	103	40,897	\$266,500	40,897	\$568,468	-\$301,968	\$22,456	-\$279,512
Mar-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Apr-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
May-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Jun-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Jul-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Aug-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Sep-23	0	0	0	0	\$0	0	\$0	\$0	\$0	\$0
Total	1,223,000	1,209,967	3,259	1,206,708	\$53,655,811	1,206,708	\$41,407,173	\$12,248,637	\$451,451	\$12,700,089

ATTACHMENT B
Advice No. 6219-G

Transactions - Public

Southern System Reliability Spot Purchases/Sales

December 2022

Notification Minimum Flow				PURCHASE										SALE										Net \$ \$Purchase minus \$Sale
Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt Purch (Dth)	Amt Sched (Dth)	In-kind fuel .270%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge \$.36798	Flow Date	Cycle	TC#	Amt Sold (Dth)	Amt Sched (Dth)	Sale Price \$/dth	Rule 41 Section	\$Amt			
12/1/22	12/2/22	3	35,000	3798	EHR	35,000	35,000	94	34,906	\$19.50	14b	\$682,500.00	\$12,844.71	12/14/22	4	3810	10,000	10,000	\$50.69	14b	\$506,850.00			
12/7/22	12/8/22	3	59,000	3799	EHR	15,000	15,000	40	14,960	\$30.00	15	\$450,000.00	\$5,504.98	12/16/22	1	3816	5,000	5,000	\$35.57	14b	\$177,825.00			
				3800	EHR	5,000	5,000	14	4,986	\$38.00	15	\$190,000.00	\$1,834.75	12/17/22	1	3816	5,000	5,000	\$33.96	14a	\$169,800.00			
				3801	EHR	30,000	30,000	81	29,919	\$40.00	15	\$1,200,000.00	\$11,009.59	12/18/22	1	3816	5,000	5,000	\$33.96	14a	\$169,800.00			
				3802	Otay	9,000	9,000	24	8,976	\$55.00	15	\$495,000.00	\$3,302.99	12/19/22	1	3816	5,000	5,000	\$33.96	14a	\$169,800.00			
12/8/22	12/9/22	3	39,000	3803	EHR	10,000	10,000	27	9,973	\$48.00	15	\$480,000.00	\$3,669.86	12/20/22	1	3816	5,000	5,000	\$36.12	14a	\$180,600.00			
				3804	EHR	21,900	15,598	42	15,556	\$49.00	15	\$764,302.00	\$5,724.30	12/21/22	1	3816	5,000	5,000	\$27.78	14a	\$138,875.00			
				3805	EHR	7,100	7,100	19	7,081	\$50.00	15	\$355,000.00	\$2,605.67	12/22/22	1	3816	5,000	5,000	\$48.93	14a	\$244,650.00			
12/11/22	12/12/22	3	38,000	3806	EHR	38,000	38,000	103	37,897	\$45.00	14b	\$1,710,000.00	\$13,945.34	12/23/22	1	3816	5,000	4,988	\$36.96	14a	\$184,356.48			
12/12/22	12/13/22	3	128,000	3807	EHR	100,500	100,500	271	100,229	\$70.00	15	\$7,035,000.00	\$36,882.27	12/24/22	1	3816	5,000	5,000	\$37.63	14a	\$188,125.00			
				3808	EHR	17,500	17,500	48	17,452	\$72.00	15	\$1,260,000.00	\$6,421.99	12/25/22	1	3816	5,000	5,000	\$37.63	14a	\$188,125.00			
				3809	EHR	10,000	10,000	27	9,973	\$80.00	15	\$800,000.00	\$3,669.86	12/26/22	1	3816	5,000	5,000	\$37.63	14a	\$188,125.00			
12/13/22	12/14/22	3	138,000	3812	EHR	50,000	50,000	135	49,865	\$45.00	14b	\$2,250,000.00	\$18,349.32	12/27/22	1	3816	5,000	5,000	\$37.63	14a	\$188,125.00			
				3813	Otay	58,000	58,000	157	57,843	\$45.00	14b	\$2,610,000.00	\$21,285.07	12/28/22	1	3816	5,000	5,000	\$28.56	14a	\$142,775.00			
				3814	EHR	1,500	1,500	4	1,496	\$47.50	14b	\$71,250.00	\$550.50	12/29/22	1	3816	5,000	5,000	\$21.02	14a	\$105,100.00			
				3815	EHR	28,500	28,500	77	28,423	\$48.00	14b	\$1,368,000.00	\$10,459.10	12/30/22	1	3816	5,000	5,000	\$15.02	14a	\$75,100.00			
12/14/22	12/15/22	3	143,000	3817	EHR	20,000	20,000	54	19,946	\$33.00	14b	\$660,000.00	\$7,339.73	12/31/22	1	3816	5,000	5,000	\$15.02	14a	\$75,100.00			
				3818	EHR	5,000	5,000	14	4,986	\$33.50	15	\$167,500.00	\$1,834.75	12/16/22	1	3821	30,000	30,000	\$35.75	14a	\$1,072,350.00			
				3819	EHR	18,000	16,959	46	16,913	\$38.50	15	\$652,921.50	\$6,223.65	12/16/22	1	3822	20,000	20,000	\$35.75	14a	\$714,900.00			
				3820	EHR	100,000	100,000	269	99,731	\$38.75	15	\$3,875,000.00	\$36,699.01	12/16/22	1	3823	12,500	12,500	\$35.77	14a	\$447,062.50			
12/15/22	12/16/22	3	78,000	3826	EHR	5,000	1,979	5	1,974	\$35.00	14b	\$69,265.00	\$726.39	12/16/22	1	3824	37,500	37,500	\$35.77	14a	\$1,341,187.50			
				3827	EHR	15,000	15,000	41	14,959	\$35.00	14b	\$525,000.00	\$5,504.61	12/16/22	1	3825	2,500	2,500	\$36.57	14a	\$91,412.50			
				3828	Otay	30,000	30,000	81	29,919	\$39.00	14b	\$1,170,000.00	\$11,009.59	12/17-19/2022	1	3830	30,000	30,000	\$34.29	14a	\$1,028,700.00			
				3829	EHR	28,000	28,000	75	27,925	\$39.50	14b	\$1,106,000.00	\$10,275.84	12/17-19/2022	1	3830	30,000	30,000	\$34.29	14a	\$1,028,700.00			
12/16/22	12/17/22	1	81,000	3834	EHR	19,499	19,499	53	19,446	\$41.50	15	\$809,208.50	\$7,155.74	12/17-19/2023	1	3830	30,000	30,000	\$34.29	14a	\$1,028,700.00			
				3835	EHR	20,000	20,000	54	19,946	\$41.50	15	\$830,000.00	\$7,339.73	12/17-19/2022	1	3831	15,000	15,000	\$34.46	14a	\$516,900.00			
				3836	Otay	41,501	41,501	112	41,389	\$48.00	15	\$1,992,048.00	\$15,230.32	12/17-19/2022	1	3831	15,000	15,000	\$34.46	14a	\$516,900.00			
12/16/22	12/18/22	1	86,000	3837	EHR	19,499	19,499	53	19,446	\$41.50	15	\$809,208.50	\$7,155.74	12/17-19/2022	1	3831	15,000	15,000	\$34.46	14a	\$516,900.00			
				3838	EHR	10,000	10,000	27	9,973	\$41.50	15	\$415,000.00	\$3,669.86	12/20/22	1	3832	10,000	10,000	\$36.12	14a	\$361,200.00			
				3839	Otay	56,501	56,501	153	56,348	\$48.00	15	\$2,712,048.00	\$20,734.94	12/21/22	1	3832	10,000	10,000	\$27.78	14a	\$277,750.00			
12/18/22	12/19/22	3	68,000	3840	EHR	40,000	40,000	108	39,892	\$35.00	14b	\$1,400,000.00	\$14,679.46	12/22/22	1	3832	10,000	10,000	\$48.93	14a	\$489,300.00			
				3841	EHR	3,500	3,500	9	3,491	\$35.00	14b	\$122,500.00	\$1,284.62	12/23/22	1	3832	10,000	10,000	\$36.96	14a	\$369,600.00			
				3842	EHR	24,500	24,500	67	24,433	\$38.00	14b	\$931,000.00	\$8,990.86	12/24/22	1	3832	10,000	10,000	\$37.63	14a	\$376,250.00			
12/19/22	12/20/22	3	88,000	3846	EHR	27,000	27,000	73	26,927	\$38.00	14b	\$1,026,000.00	\$9,908.60	12/25/22	1	3832	10,000	10,000	\$37.63	14a	\$376,250.00			
				3847	EHR	61,000	61,000	164	60,836	\$39.80	14b	\$2,427,800.00	\$22,386.43	12/26/22	1	3832	10,000	10,000	\$37.63	14a	\$376,250.00			
12/20/22	12/20/22	4	27,000	3851	EHR	12,000	12,000	32	11,968	\$37.00	14b	\$444,000.00	\$4,403.98	12/27/22	1	3832	10,000	10,000	\$37.63	14a	\$376,250.00			
				3852	EHR	10,000	10,000	27	9,973	\$39.80	14b	\$398,000.00	\$3,669.86	12/28/22	1	3832	10,000	10,000	\$28.56	14a	\$285,550.00			
				3853	EHR	5,000	5,000	14	4,986	\$37.50	14b	\$187,500.00	\$1,834.75	12/29/22	1	3832	10,000	10,000	\$21.02	14a	\$210,200.00			
12/20/22	12/21/22	3	66,000	3854	EHR	14,000	14,000	38	13,962	\$30.75	14b	\$430,500.00	\$5,137.74	12/30/22	1	3832	10,000	10,000	\$15.02	14a	\$150,200.00			
				3855	EHR	7,500	7,500	20	7,480	\$32.00	15	\$240,000.00	\$2,752.49	12/31/22	1	3832	10,000	10,000	\$15.02	14a	\$150,200.00			
				3856	EHR	44,500	44,500	120	44,380	\$33.35	15	\$1,484,075.00	\$16,330.95	12/16/22	5	3833	1,700	1,700	\$37.00	14b	\$62,900.00			
12/21/22	12/22/22	3	108,000	3859	EHR	63,000	60,331	162	60,169	\$64.00	15	\$3,861,184.00	\$22,140.99	12/20/22	1	3843	10,000	10,000	\$36.26	14a	\$362,600.00			
				3860	EHR	5,000	5,000	14	4,986	\$64.50	15	\$322,500.00	\$1,834.75	12/20/22	1	3844	50,000	50,000	\$36.12	14a	\$1,806,000.00			
				3861	EHR	40,000	40,000	108	39,892	\$65.00	15	\$2,600,000.00	\$14,679.46	12/20/22	1	3845	50,000	50,000	\$36.26	14a	\$1,813,000.00			
														12/21/22	1	3848	25,000	25,000	\$27.78	14a	\$694,375.00			
														12/21/22	1	3849	70,000	70,000	\$27.78	14a	\$1,944,250.00			
														12/21/22	1	3850	30,000	30,000	\$27.78	14a	\$833,250.00			
														12/22/22	1	3857	45,000	45,000	\$48.93	14a	\$2,201,850.00			
														12/22/22	1	3858	158,000	158,000	\$49.43	14a	\$7,809,940.00			
														12/23/22	1	3862	45,000	45,000	\$36.96	14a	\$1,663,200.00			
														12/23/22	1	3863	100,000	100,000	\$37.46	14a	\$3,746,000.00			
Dec 22 Total						1,182,000	1,168,967	3,156	1,165,811			\$53,389,311	\$428,995					1,032,188			\$38,133,209	\$15,685,097		

Southern System Reliability Spot Purchases/Sales

January 2023

Notification Minimum Flow				PURCHASE										SALE										Net \$ \$Purchase minus \$Sale
Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt Purch (Dth)	Amt Sched (Dth)	Inkind .270%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge \$.36798	Flow Date	Cycle	TC#	Amt Sold (Dth)	Amt Sched (Dth)	Sale Price \$/dth	Rule 41 Section	\$Amt			
														1/5/23	1	3864	10,000	10,000	\$20.19	14a	\$201,900.00			
														1/5/23	1	3865	12,000	12,000	\$20.21	14a	\$242,520.00			
														1/5/23	1	3866	33,000	33,000	\$20.21	14a	\$666,930.00			
														1/5/23	1	3867	15,000	15,000	\$20.21	14a	\$303,150.00			
														1/5/23	1	3868	50,000	50,000	\$20.18	14a	\$1,009,000.00			
														1/14-17/2023	1	3869	13,623	13,623	\$20.70	14a	\$281,996.10			
Jan 23 Total																		133,623			\$2,705,496	(\$2,705,496)		

February 2023

Notification Minimum Flow				PURCHASE										SALE										Net \$ \$Purchase minus \$Sale
Date notified	Flow Date	Cycle	Amt needed (Dths)	TC#	Delivery Point	Amt Purch (Dth)	Amt Sched (Dth)	Inkind .250%	Net Amt flowed	Purchase Price \$/dth	Rule 41 Section	\$Amt	BTS Charge \$.54908	Flow Date	Cycle	TC#	Amt Sold (Dth)	Amt Sched (Dth)	Sale Price \$/dth	Rule 41 Section	\$Amt			
2/13/23	2/14/23	3	41,000	3879	EHR	41,000	41,000	103	40,898	\$6.50	14b	\$266,500.00	\$22,456.27	2/24/23	1	3880	40,897	40,897	\$13.90	14a	\$568,468.30			
Feb 23 Total			41,000			41,000	41,000	103	40,898			\$266,500.00	\$22,456.27					40,897			\$568,468.30	(\$279,512.03)		

Grand Total	1,223,000		1,223,000	1,209,967	3,259	1,206,709		45	53,655,811	451,451				1,206,708			41,407,173	\$12,700,089
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Table 1				
Southern System Purchases, Summary October 2022 through September 2023				
Rule No.	# Transactions	Transaction %	Purchase \$	Purchase %
Section 1	21	47%	\$19,855,815	37%
Section 1	24	53%	\$33,799,996	63%
Total	45	100%	\$53,655,811	100%

Table 2				
Southern System Sales, Summary October 2022 through September 2023				
Rule No.	# Transactions	Transaction %	Sale \$	Sale %
Section 14(a)	55	95%	\$40,659,598	98%
Section 14(b)	3	5%	\$747,575	2%
Total	58	100%	\$41,407,173	100%

ATTACHMENT D
Advice No. 6219-G

**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

Quantity Requested: 35,000 DTH

Flow Date(s) Requested: December 2, 2022

Time of Request: 07:45pm December 1, 2022

Reason for Request: Southern System scheduled quantities are expected to be 35,000 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: December 8, 2022

Time of Request: 9:15 PM December 7, 2022

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 Request

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

Location: Southern System

Quantity Requested: 39,000 DTH

Flow Date(s) Requested: December 9, 2022

Time of Request: 8:15 PM December 8, 2022

Reason for Request: Southern System scheduled quantities are expected to be 39,000 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: 38,000 DTH

Flow Date(s) Requested: December 12, 2022

Time of Request: 8:00 PM December 11, 2022

Reason for Request: Southern System scheduled quantities are expected to be 38,000 DTH below the southern system minimum flowing supply requirement.



Southern System Reliability Request

Purpose: SoCalGas' Gas Control Department is requesting that Operational Hub acquire gas supplies to ensure system reliability.

Location: Southern System

Quantity Requested: 128,000 DTH

Flow Date(s) Requested: December 13, 2022

Time of Request: 8:00 PM December 12, 2022

Reason for Request: Southern System scheduled quantities are expected to be 128,000 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: 128,000 DTH

Flow Date(s) Requested: December 13, 2022

Time of Request: 8:00 PM December 12, 2022

Reason for Request: Southern System scheduled quantities are expected to be 128,000 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: 138,000 DTH

Flow Date(s) Requested: December 14, 2022

Time of Request: 8:30 PM December 13, 2022

Reason for Request: Southern System scheduled quantities are expected to be 138,000 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: 143,000 DTH

Flow Date(s) Requested: December 15, 2022

Time of Request: 8:30 PM December 14, 2022

Reason for Request: Southern System scheduled quantities are expected to be 143,000 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: 78,000 DTH

Flow Date(s) Requested: December 16, 2022

Time of Request: 8:20 PM December 15, 2022

Reason for Request: Southern System scheduled quantities are expected to be 78,000 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: 81,000 DTH

Flow Date(s) Requested: December 17, 2022

Time of Request: 1:50 PM December 16, 2022

Reason for Request: Southern System scheduled quantities are expected to be 81,000 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: 86,000 DTH

Flow Date(s) Requested: December 18, 2022

Time of Request: 1:50 PM December 16, 2022

Reason for Request: Southern System scheduled quantities are expected to be 86,000 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: 68,000 DTH

Flow Date(s) Requested: December 19, 2022

Time of Request: 7.56 PM December 18, 2022

Reason for Request: Southern System scheduled quantities are expected to be 68,000 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: 88,000 DTH

Flow Date(s) Requested: December 20, 2022

Time of Request: 8:20 PM December 19, 2022

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: 27,000 DTH

Flow Date(s) Requested: December 20, 2022

Time of Request: 11:40 AM December 20, 2022

Reason for Request: Southern System scheduled quantities are expected to be 27,000 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: December 21, 2022

Time of Request: 8:05 PM December 20, 2022

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: 108,000 DTH

Flow Date(s) Requested: December 22, 2022

Time of Request: 9:00 PM December 21, 2022

Reason for Request: Southern System scheduled quantities are expected to be 108,000 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: 41,000 DTH

Flow Date(s) Requested: February 14, 2023

Time of Request: 7:50 PM February 13, 2023

Reason for Request: Southern System scheduled quantities are expected to be 41,000 DTH below the southern system minimum flowing supply requirement.

ATTACHMENT E
Advice No. 6219-G

Transactions – Confidential

Confidential and Protected Materials
Pursuant to Public Utilities Code Section 583,
General Order 66-D, and D.21-09-020