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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) to Expand Existing Off-System Delivery Authority.	A.08-06-006

OPENING BRIEF OF THE INDICATED PRODUCERS

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OPENING BRIEF OF THE INDICATED PRODUCERS

Pursuant to the bench ruling of October 29, 2009, the Indicated Producers[1] (IP) submit this opening brief to address off-system delivery issues raised in the above-captioned proceeding.

I. INTRODUCTION AND OVERVIEW

Through this application, SoCalGas/SDG&E seek expanded authority to offer off-system delivery (OSD) service to all interconnection points on their system. While OSD service was initially authorized in the firm access rights case (A.04-12-004), the impact of those services has been limited due to the restricted nature of the delivery to one SoCalGas/SDG&E receipt point. The expansion of OSD authority to all SoCalGas/SDG&E receipt points could generate several benefits. However, expansion may also shift OSD revenue shortfalls to on-system customers, increase the costs of maintaining Southern System reliability, allow off-system shippers to lean on on-system balancing resources for an unreasonable period of time, and facilitate preferential treatment of affiliates. To preclude these unintended adverse impacts, the Commission should:

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1 Member companies include Aera Energy LLC, BP Energy Company, BP America Inc. (including Atlantic Richfield Company), ConocoPhillips Company, Chevron U.S.A. Inc., and Occidental Energy Marketing Inc.

- Adopt a 1.5 cents/dth rate floor for the interruptible OSD rate;
- Preclude the utilities from negotiating discounts to the firm OSD rate that would shift costs to on-system customers;
- Require curtailment of interruptible OSD services when the provision of these services would increase Southern System reliability costs;
- Require the utilities to post information on OSD transactions with affiliates, define "similarly situated shipper" in their OSD tariff, and curtail OSD nominations in a manner that ensures all OSD nominations are treated alike; and
- Shorten the number of days that an OSD shipper has to address imbalances occurring after Cycle 4 as a result of interstate pipeline scheduling mismatches from 10 days to 2 days.

These issues are discussed in more detail below.

II. OFF-SYSTEM DELIVERY SERVICES SHOULD NOT SHIFT COSTS TO ON-SYSTEM CUSTOMERS

The Commission should ensure that the rates charged for OSD services do not shift costs to on-system users. SoCalGas/SDG&E contend that expanded OSD services can provide several benefits to on-system users including increased transportation revenues.[2] However, if the rate charged for the service does not exceed the cost of providing the service, there is no net benefit to on-system users. Stated differently, if the rate charged falls below the cost of providing the service, on-system users will be forced to subsidize the new services. As noted below, to ensure that on-system users do not bear additional costs as a result of these services, the Commission should establish an interruptible OSD rate floor that prevents SoCalGas/SDG&E from charging a rate that is less than the marginal cost to provide this service. The Commission should also restrict the utilities' ability to negotiate discounts to the firm OSD charge.

[2] Exhibit 2, SoCalGas/SDG&E/Schwecke, at 3.

A. The Commission Should Establish an Interruptible OSD Rate Floor to Ensure that the Provision of OSD Services do not Create Shortfalls that are Passed on to On-System Customers

SoCalGas/SDG&E note that one of the benefits of OSD service would be that the incremental revenues can be used to offset transportation costs for on-system users:

> *Assuming that SoCalGas would not be at-risk for its backbone transmission facilities, which is the case today, SoCalGas would use these additional revenues to reduce transportation rates for its on-system, end-use customers.*[3]

Additional revenues can only offset on-system transportation revenues, however, if the cost of the OSD services recovers sufficient funds to cover the cost of providing the service. SoCalGas/SDG&E note that a 1.5 cents/Dth interim floor would ensure that discounts to the interruptible OSD rate will, at a minimum, recover the short-run marginal cost of providing these services.[4] To ensure that the costs of providing OSD services do not shift shortfalls to on-system users, therefore, the Commission should establish a rate floor of 1.5 cents/dth.

B. The Commission Should Place Limits on Ability of Utilities to Discount Firm OSD Charge to Ensure Costs are not Shifted to On-System Customers.

The utilities propose to provide firm OSD services for a rate that is equal to a facilities charge plus an interruptible OSD charge.[5] At the hearing, however, Mr. Schwecke clarified that the utilities may discount the rate either by charging a lower rate or by assessing a portion of the rate on a volumetric basis.[6] Thus,

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3 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 4-5.
4 Exhibit 3, SoCalGas/SDG&E/Schwecke, at 11.
5 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 7.
6 2 Tr. 99-100, 105, SoCalGas/SDG&E/Schwecke.

while they propose a firm OSD rate in this proceeding, they also note that the "*actual facility costs*" would be addressed in detail in a specific application.[7] Mr. Schwecke acknowledged that discounts would result in less revenues being passed through to on-system customers.[8] In contrast, however, the utilities' shareholders would secure their full return on equity.[9] In short, while the utilities seek the authority to discount the OSD rate to the detriment of on-system customers, the discount would not impact utility shareholders.

The Commission must ensure that the utilities do not negotiate discounts that shift OSD costs to on-system users. To prevent on-system users from subsidizing firm OSD service, the Commission should restrict the utilities' ability to negotiate discounts to firm OSD service. In particular, the Commission should preclude the utilities from entering into transactions involving firm OSD services that do not cover the facilities charges which are meant to recover the associated incremental capital costs associated with the provision of firm OSD service. In addition, firm OSD users should pay the full undiscounted interruptible OSD charge. As the utilities note, "*[t]he Commission approved a single postage-stamp FAR transportation charge for all receipt points on its backbone transmission system*." [10] It is appropriate that the same rate be assessed whether firm deliveries are made on-system or off-system.[11]

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7 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 7.
8 2 Tr. 105, SoCalGas/SDG&E/Schwecke.
9 2 Tr. 100, SoCalGas/SDG&E/Schwecke.
10 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 12-13.
11 The utilities also note that a postage-stamp rate for on-system and OSD is appropriate although they also seek the authority to discount the rate. Exhibit 2, SoCalGas/SDG&E/Schwecke, at 13.

III. OSD SHIPPER IMBALANCE RULE SHOULD NOT PERMIT THESE SHIPPERS TO LEAN ON ON-SYSTEM RESOURCES FOR EXTENDED PERIOD OF TIME.

The Commission must modify the utilities' OSD shipper imbalance rule to ensure that OSD shippers do not rely on on-system resources for an unreasonable period of time. As SCGC witness, Catherine Yap notes, "*the OSD customers do not contribute to load balancing resources and would effectively get a free ride for whatever balancing services they require*."[12] Moreover, the OSD shipper imbalance rule would allow imbalances on the system, even on days when operational flow orders (OFOs) are called while other end-use customers are subject to daily balancing.[13] Accordingly, in place of the ten day imbalance shipper rule, the Commission should adopt a rule allowing shippers two business days to address imbalances resulting after Cycle 4 and from interconnecting pipeline scheduling practices.

The testimony reveals that OSD shippers do not need ten days to resolve these limited imbalances. SoCalGas/SDG&E propose a different balancing rule for an OSD shipper when imbalances result following Cycle 4 due to mismatches that occur as a result of interconnecting pipeline scheduling adjustments.[14] Under these limited circumstances, the utilities intend to provide the OSD shipper ten calendar days to clear an imbalance.[15] The utilities note that they "*would be*

12 Exhibit 4, SCGC/Yap, at 6.
13 1 Tr. 56-57, SoCalGas/SDG&E/Schwecke.
14 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 14.
15 Exhibit 2, SoCalGas/SDG&E/Schwecke, at 15.

amendable to shortening the period" but they do not support SCGC's proposal as they consider it extreme.[16]

A shipper imbalance rule providing OSD shippers two business days to resolve post Cycle 4 imbalance should be adopted. The utilities' testimony notes the need for this imbalance rule on the grounds that the OSD shipper will be unaware and unable to prevent the resulting imbalance that takes place only after Cycle 4 and as a result of the interconnecting pipeline's scheduling practices.[17] This would leave the OSD shipper Cycle 5 only to address the resulting imbalance. SoCalGas/SDG&E have noted that Cycle 5 is a "*non-NAESB compliant, accounting-only*" cycle that does not allow users to rely on interruptible storage or hub services.[18] In other words, Cycle 5 does not provide OSD shippers an adequate opportunity to resolve these imbalances on the same day that an OSD shipper is notified of the imbalance. However, if the OSD shipper had 2 business days, it would have several cycles in which to effectively address these imbalances. Notably, SoCalGas/SDG&E agree that 2-3 business days would be a reasonable period of time to allow OSD shippers to clear these imbalances.[19]

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16 Exhibit 3, SoCalGas/SDG&E/Schwecke, at 7.
17 1 Tr. 56, SoCalGas/SDG&E/Schwecke.
18 Exhibit 3, SoCalGas/SDG&E/Schwecke, at 6; 2 Tr. 80, SoCalGas/SDG&E/Schwecke.
19 2 Tr. 83, SoCalGas/SDG&E/Schwecke.

IV. TO PRECLUDE PROVISION OF PREFERENTIAL TREATMENT OF AFFILIATES, THE COMMISSION SHOULD REQUIRE UTILITIES TO POST DISCOUNTS PROVIDED TO AFFILIATES, DEFINE SIMILARLY SITUATED SHIPPERS, AND CURTAIL OSD NOMINATIONS ON A PROPORTIONATE BASIS.

Since the FAR proceeding the utilities have sought expanded OSD services in part to facilitate a broader market to attract liquefied natural gas (LNG).[20] Today, Sempra's Costa Azul facility is the only operational LNG facility on the west coast that would benefit from expanded OSD services.[21] To ensure that the expanded services do not lead to preferential treatment of affiliates, particularly those marketing LNG from the Costa Azul facility, the Commission should adopt measures to increase the transparency of OSD transactions involving SoCalGas/SDG&E affiliates. In particular, the Commission should require the utilities to disclose discounted OSD transactions with affiliates. To further limit preferential treatment, the OSD tariffs should define similarly situated shippers and require curtailment procedures to treat all OSD deliveries alike.

The OSD discount postings, proposed by SoCalGas/SDG&E do not provide sufficient transparency over affiliate transactions. The utilities note that they would offer similarly situated shippers the same discount on a given day:

> *SDG&E/SoCalGas believe that posting all interruptible off-system discounts each day, as is the current practice with interruptible FAR rights, and offering the same discount to similarly-situated OSD shippers will ensure that any such discounts are provided on a non-discriminatory basis.*[22]

At the hearings, SoCalGas/SDG&E's witness Rodger Schwecke clarified that similarly situated shippers are those that "*mak[e] a nomination for off-system*

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[20] 1 Tr. 51, SoCalGas/SDG&E/Schwecke.

[21] 1 Tr. 51, SoCalGas/SDG&E/Schwecke.

[22] Exhibit 3, SoCalGas/SDG&E/Schwecke, at 11.

deliveries service at a particular point." In other words, whether a shipper receives the discount would depend on the off-system delivery receipt point.[23] Mr. Schwecke also indicated that once the discount was posted, it would remain in effect for the entire flow day.[24] Just as they do today, the utilities would provide the following information in the posting: date, point, and price.[25] The utilities, however, would not post actual transactional prices.[26] Moreover, the utilities do not believe they have any obligation to post transactions with affiliates:

> Q *What would be the posting obligation if a discount is provided to an affiliate?*
>
> A *Since we are posting a price and not based on our indication what the market is and not by an individual contract with a party and we are making that available to everyone, we don't have any – I don't believe we have any additional posting requirements for whether an affiliate takes advantage of that discount*.[27]

In particular, Mr. Schwecke was not sure whether the provision of interruptible OSD services at a price below the maximum tariffed price constituted a discount transaction that required posting under the affiliate rules:

> Q *So, for example, if SoCalGas charges an affiliate a 1.5 cent interruptible off-system delivery charge, are you saying that it would not consider this a discount transaction that would require posting under the affiliate rules?*
>
> A *No. What I am saying is we would post the 1.5 as a discount, not necessarily a specific contract, and just like any other customer the affiliate could take advantage of that discount that we posted.*
>
> Q *But under the affiliate – would you consider it a discount transaction under the affiliate rules that would require posting?*

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23 1 Tr. 47, SoCalGas/SDG&E/Schwecke.
24 1 Tr. 49, SoCalGas/SDG&E/Schwecke.
25 1 Tr. 49, SoCalGas/SDG&E/Schwecke.
26 1 Tr. 49-50, SoCalGas/SDG&E/Schwecke.
27 1 Tr. 50, SoCalGas/SDG&E/Schwecke.

A I don't know.[28]

In short, the utilities do not intend to post information about executed transactions, even those involving affiliates.

Limited use of OSD services could lead to preferential treatment of affiliates. As Ms. Yap notes, the demand for expanded OSD services could be limited.[29] In other words, "*[g]iven how thin the OSD market has proven to be so far, it is far more likely that SoCalGas would be addressing discounts for OSD services on a customer-by-customer basis*."[30] Ms. Yap also notes that Sempra LNG is expected to seek OSD services particularly where a discount is permitted.[31] This presents an "*opportunity for self-dealing particularly in light of the complete dearth of guidelines for discounting*." In other words, it is possible that even if a discounted OSD rate at a particular receipt point is made available to all customers, only one customer would be in a position to take advantage of it. Moreover there are several factors that could influence the OSD discount leaving SoCalGas/SDG&E with much discretion to establish daily OSD prices. Mr. Schwecke noted that the differential between markets or basin prices can influence the potential discount provided on OSD service on a given day.[32] In addition, transportation costs on the Baja Norte pipeline are likely to influence OSD discounts, particularly those that originate from Sempra's Costa Azul facility since this pipeline provides an alternative to moving supplies through the

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28 1 Tr. 50, SoCalGas/SDG&E/Schwecke.
29 Exhibit 4, SCGC/Yap, 4-5.
30 Exhibit 4, SCGC/Yap, 12.
31 Exhibit 4, SCGC/Yap, 14.
32 1 Tr. 47, SoCalGas/SDG&E/Schwecke.

SoCalGas/SDG&E system. The limited use of OSD services, particularly at certain receipt points coupled with the broad discretion SoCalGas/SDG&E has to set these discounts, could lead to preferential treatment of affiliates. To ensure that limited use of OSD services does not lead to preferential treatment, the Commission should require the utilities to post discounted OSD transactions with affiliates within 24 hours.

Ordering the utilities to post discounted OSD transactions with affiliates is consistent with the Commission's affiliate rules, which require notice of discounts provided to affiliates as promptly as 24 hours. The posting must also provide the following information:

- "*the name of the affiliate involved in the transaction;*
- *the rate charged;*
- *the maximum rate;*
- *the time period for which the discount or waiver applies*
- *the quantities involved in the transaction;*
- *the delivery points involved in the transaction;*
- *any conditions or requirements applicable to the discount or waiver, and a documentation of the cost differential underlying the discount . . .*
- *procedures by which a nonaffiliated entity may request a comparable offer*."[33]

Posting information about OSD transactions with rates less than the maximum tariffed rate would therefore be consistent with the level of disclosure required by the affiliate rules.

The OSD affiliate transactional postings must provide sufficient information to demonstrate that the utilities are not providing preferential treatment to their affiliates. As noted at the hearings, SoCalGas/SDG&E do not

[33] Section III(F) of the affiliate rules.

intend to post any transactional information even where discounts are provided.[34] Information about the degree of affiliate transactions, discounts provided below the maximum tariffed rate, and receipt points used, however, will help clarify that Sempra affiliates are not getting preferential treatment. In particular, for each discount provided to an affiliate below the maximum tariffed rate, the Commission should require the utilities to provide the name of the affiliate purchasing the OSD service, the transaction price, the identity of the receipt point, and the quantity of gas transported for the affiliate.

Two additional features must be incorporated into the OSD tariffs to limit preferential treatment of affiliates. First, the OSD tariffs must also include a definition of "similarly situated" shippers to ensure that all shippers using the same OSD receipt point are able to secure the same discount regardless of contracted quantities or length of applicable contracts. Second, to ensure that similarly situated shippers are treated alike, OSD curtailment must be based on the relative quantity of gas transported through a receipt point. In other words, curtailment should not be impacted by the price paid for the OSD delivery or other applicable contractual terms. Accordingly, the tariffs should clarify the following:

(1) Discounts provided on OSD services will be made available to all similarly situated shippers on a given day.

(2) Similarly situated shippers are those shippers using the same OSD receipt point on a given day regardless of the volume of natural gas transported or the length of applicable contracts.

[34] 1 Tr. 49, SoCalGas/SDG&E/Schwecke.

(3) OSD curtailment will be on a proportionate basis and based solely on the relative quantity of gas transported through an OSD receipt point.

V. EXPANDED OSD SERVICES SHOULD NOT INCREASE SOUTHERN SYSTEM RELIABILITY COSTS.

The provision of OSD services should not increase Southern System costs, which are socialized to all on-system customers. Without the appropriate measures, the provision of interruptible OSD services on a displacement basis may increase these costs due to the accounting treatment involved. To ensure that the expansion of OSD services do not increase Southern System costs, IP supports SCGC's recommendation that the utilities curtail OSD services when the provision of these services can increase Southern System reliability costs.

The utilities' proposed tariffs do not provide sufficient assurances that the provision of OSD services will not increase Southern System costs. SoCalGas/SDG&E provided proposed tariffs including a proposed Rule 23 which details curtailment. The proposed rule clarifies that OSD services will "*be curtailed before any on-system customer loads are impacted*."[35] The rule does not, however, squarely address impacts of OSD services on Southern System reliability or the costs of maintaining reliability in this region. As a result, it is possible that the provision of interruptible OSD services at the Blythe receipt point can decrease the quantities of gas coming into the Southern System and require the System Operator to procure incremental supplies.

The Commission should adopt SCGC's proposal to curtail OSD services where it increases the cost of maintaining Southern System reliability. SCGC

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35 Exhibit 3, SoCalGas/SDG&E/Schwecke, at 8.

recommends that the Commission require the utilities' tariffs to clearly state that OSD service will be curtailed if it creates or worsens Southern System minimum flow conditions. SoCalGas/SDG&E has further clarified that they would not exercise System Operator call option contracts approved in Resolution G-3435 (Southern System Reliability Contracts) to provide OSD services.[36] Importantly, SoCalGas/SDG&E are willing to clarify that the provision of OSD services should not increase Southern System reliability costs in their tariff:

> *A … We sould not schedule, or confirm, excuse me, OSD service and then turn around and purchase supplies to meet that confirmation.*
>
> *Q Would SoCalGas be willing to include either in G-OSD as it might be revised, or your new Rule 41 that is going to be coming shortly in the BCAP, would you agree to revisiting the tariff in one of those places, or maybe a different place but revising the tariff so as to make that obligation clear?*
>
> *A Yeah, we would be comfortable with doing that.*[37]

Adoption of this proposal will ensure that on-system users do not bear incremental reliability costs as a result of expanded OSD services.

VI. CONCLUSION

For the foregoing reasons, the Commission should adopt the following measures to ensure that expansion of OSD services do not have unintended adverse impacts on on-system customers:

- Adopt a 1.5 cents/dth rate floor for the interruptible OSD rate;
- Preclude the utilities from negotiating discounts to the firm OSD rate that would shift costs to on-system customers;

[36] 2 Tr. 87, SoCalGas/SDG&E/Schwecke.
[37] 2 Tr. 85, SoCalGas/SDG&E/Schwecke.

- Require curtailment of interruptible OSD services when the provision of these services would increase Southern System reliability costs;
- Require the utilities to post information on OSD transactions with affiliates, define “similarly situated shipper” in their OSD tariff, and curtail OSD nominations in a manner that ensure all OSD nominations are treated alike; and
- Shorten the number of days that an OSD shipper has to address imbalances occurring after Cycle 4 as a result of interstate pipeline scheduling mismatches from 10 days to 2 days.

December 4, 2009

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Karen Terranova hereby certify that I have on this date caused the attached **Opening Brief of the Indicated Producers** in A.08-06-006 to be served to all known parties by either United States mail or electronic mail, to each party named in the official attached service list obtained from the Commission's website, attached hereto, and pursuant to the Commission's Rules of Practice and Procedure.

Dated December 4, 2009, at San Francisco, California.

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