

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



FILED
7-12-17
04:59 PM

Order Instituting Investigation on the Commission's Own Motion to Determine Whether the Aliso Canyon Natural Gas Storage Facility has Remained Out of Service for Nine or More Consecutive Months Pursuant to Public Utilities Code Section 455.5(a) and Whether any Expenses Associated with the Out of Service Plant Should be Disallowed from Southern California Gas Company's Rates.

Investigation 17-03-002
(Filed March 2, 2017)

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true and correct copy of the foregoing **REPLY OF IMPERIAL IRRIGATION DISTRICT TO SOUTHERN CALIFORNIA GAS COMPANY'S RESPONSE TO ITS MOTION FOR CONSOLIDATION OF INVESTIGATIONS 17-02-002 AND 17-03-002** to each party named in the official service list for proceedings I.17-03-002, by electronic mail or first class mail.

Dated this 12th day of July, 2017, at San Diego, California.

/s/ Maria E. Byrnes

Maria E. Byrnes

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: I1703002 - CPUC - OII TO DETERM
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: JUNE 26, 2017

Parties

SABINA B. CLORFEINE
ASSISTANT GEN. COUNSEL
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH ST., STE 1400, GT14E7
LOS ANGELES, CA 90013
FOR: SOUTHERN CALIFORNIA GAS COMPANY

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
444 SOUTH FLOWER ST., SUITE 1500
LOS ANGELES, CA 90071-2916
FOR: SOUTHERN CALIFORNIA GENERATION
COALITION

MARIA C. SEVERSON, ESQ.
ATTORNEY
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, STE. 1050
SAN DIEGO, CA 92101-3591
FOR: IMPERIAL IRRIGATION DISTRICT (IID)

LAURA J. TUDISCO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5032
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: ORA

ROBERT FINKELSTEIN
GENERAL COUNSEL
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO, CA 94103
FOR: THE UTILITY REFORM NETWORK

Information Only

GREGORY S.G. KLATT
ATTORNEY
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY, CA 00000

JOHN W. LESLIE, ESQ.
DENTONS US LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

MATT FALLON
SHELTER HARBOR ADVISORS
EMAIL ONLY
EMAIL ONLY, CT 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JIM KOBUS
D. E. SHAW & CO.
1166 AVENUE OF THE AMERICAS, 8TH FL.
NEW YORK, NY 10036

ANU VEGE
DIRECTOR, REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B10C
SAN FRANCISCO, CA 64105

PAUL GENDRON
SEQUENT ENERGY MANAGEMENT
1200 SMITH STREET, SUITE 900
HOUSTON, TX 77002

KIRBY BOSLEY
EDF TRADING NORTH AMERICA, LLC
4700 W. SAM HOUSTON PARKWAY N.
HOUSTON, TX 77041

MARK GREENBERG
MERCURIA ENERGY
20 E. GREENWAY PLAZA, SUITE 650
HOUSTON, TX 77046

MARLON O. SANTA CRUZ
L.A. DEPT OF WATER AND POWER
111 NORTH HOPE STREET, ROOM 1150
LOS ANGELES, CA 90012

PRISCILA C. KASHA
DEPUTY CITY ATTORNEY
LOS ANGELES DEPT. OF WATER & POWER
111 N. HOPE STREET, RM. 340
LOS ANGELES, CA 90012

RODNEY A. LUCK
LOS ANGELES DEPT. OF WATER & POWER
111 NORTH HOPE STREET, ROOM 1150
LOS ANGELES, CA 90012

GREG HEALY
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14D6
LOS ANGELES, CA 90013

JEFFREY B. FOHRER
SENIOR COUNSEL
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH STREET, GT-14E7
LOS ANGELES, CA 90013

JOHNNY Q. TRAN
SR. COUNSEL
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH STREET, GT-14E7
1400
LOS ANGELES, CA 90013
FOR: SOUTHERN CALIFORNIA GAS COMPANY

NANCY S. WHANG
SR. COUNSEL
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH ST., GT-14E7, STE.

LOS ANGELES, CA 90013

SETAREH MORTAZAVI
COUNSEL
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH ST., STE. 1400, GT14G1
LOS ANGELES, CA 90013

RONALD S. CAVALLERI
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH STREET, GT14D6
LOS ANGELES, CA 90013-1011

TIM ROTH
ROTH ENERGY COMPANY
POWER
545 S. FIGUEROA STREET, STE. 1235
200
LOS ANGELES, CA 90071

ANTHONY D'AQUILA
PASADENA DEPARTMENT OF WATER &

150 SOUTHERN LOS ROBES AVE., STE.

PASADENA, CA 91101

STACY CANFIELD
PASADENA DEPT OF WATER & POWER
POWER
150 SOUTH LOS ROBLES AVE., SUITE 200
PASADENA, CA 91101

STEVEN ENDO
PASADENA DEPARTMENT OF WATER &
150 S. LOS ROBLES, SUITE 200
PASADENA, CA 91101

DANIEL W. DOUGLASS
ATTORNEY
DOUGLASS & LIDDELL
4766 PARK GRANADA, STE. 209
CALABASAS, CA 91302

CHRIS CHWANG
BURBANK WATER AND POWER
164 WEST MAGNOLIA BLVD.
BURBANK, CA 91502

HIMANSHU PANDEY
ASST. POWER PRODUCTION SUPERINTENDENT
BURBANK WATER & POWER
164 W. MAGNOLIA BLVD.
BURBANK, CA 91502

MARIA BYRNES
LEGAL ASSISTANT
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, STE. 1050
SAN DIEGO, CA 92101
FOR: IMPERIAL IRRIGATION DISTRICT

MICHAEL J. AGUIRRE, ESQ.
ATTORNEY AT LAW
AGUIRRE & SEVERSON, LLP
501 WEST BROADWAY, SUITE 1050
SAN DIEGO, CA 92101
FOR: IMPERIAL IRRIGATION DISTRICT

DONALD KELLY
EXE. DIRECTOR
UTILITY CONSUMERS' ACTION NETWORK
3405 KENYON ST., STE. 401
SAN DIEGO, CA 92110

ERNESTO PASOS
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL, CA 92251

ROBERT A. LAURIE
ASSISTANT GENERAL COUNSEL - ENERGY
IMPERIAL IRRIGATION DISTRICT
333 E.BARIONI BLVD.
IMPERIAL, CA 92251

SABRINA BARBER
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL, CA 92251

SCOTT HARDING
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL, CA 92251

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080

MILA A. BUCKNER
ATTORNEY
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080

AMIE BURKHOLDER
ALCANTAR & KAHL, LLP
345 CALIFORNIA STREET, SUITE 2450
SAN FRANCISCO, CA 94104

JONATHAN PENDELTON
SR. COUNSEL
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

LISE H. JORDAN
MANAGING COUNSEL GAS OPER.
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B30A / PO BIX 7442
SAN FRANCISCO, CA 94105

CATHERINE E. YAP
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND, CA 94611

MIKE CADE
INDUSTRY SPECIALIST
ALCANTAR & KAHL
121 SW SALMON STREET, SUITE 1100
PORTLAND, OR 97204

State Service

CARLOS VELASQUEZ
CPUC - ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

FRANZ C. CHENG
CPUC - ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

NIKA ROGERS
ORA ANALYST
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

DAVID PECK
CALIF PUBLIC UTILITIES COMMISSION
PRESIDENT PICKER
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: ORA

GERALD F. KELLY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
GAS BRA
ROOM 5011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NIKA ROGERS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: ORA

RACHEL PETERSON
CALIF PUBLIC UTILITIES COMMISSION
COMMISSIONER RANDOLPH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214