

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



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In the Matter of the Application of San Diego Gas & Electric Company (U 902 G) and Southern California Gas Company (U 904 G) for Authority to Revise Their Rates Effective January 1, 2009, in Their Biennial Cost Allocation Proceeding.

Application 08-02-001  
(Filed February 4, 2008)

**JOINT COMMENTS OF  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G),  
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G),  
THE DIVISION OF RATEPAYER ADVOCATES,  
SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E),  
THE INDICATED PRODUCERS, THE SOUTHERN  
CALIFORNIA GENERATION COALITION, THE CITY OF  
LONG BEACH, SOUTHWEST GAS CORPORATION (U 905 G),  
WATSON COGENERATION COMPANY AND THE  
CALIFORNIA COGENERATION COUNCIL, THE  
CALIFORNIA MANUFACTURERS AND TECHNOLOGY  
ASSOCIATION, THE UTILITY REFORM NETWORK,  
BRIDGE HOUSING, AND THE ELECTRIC GENERATOR  
ALLIANCE ON PROPOSED DECISION**

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October 19, 2009

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**I.  
INTRODUCTION AND BACKGROUND**

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) (jointly “SDG&E/SoCalGas” or “Applicants”), the Division of Ratepayer Advocates (“DRA”), Southern California Edison Company (“SCE”), the Indicated Producers (“IP”), the Southern California Generation Coalition (“SCGC”), the City of Long Beach (“Long Beach”), Southwest Gas Corporation (“SWG”),

Watson Cogeneration Company and the California Cogeneration Council (“Watson/CCC”), the California Manufacturers and Technology Association (“CMTA”), The Utility Reform Network (“TURN”), Bridge Housing, and the Electric Generator Alliance (“EGA”) (collectively “Joint Parties”) hereby file these comments concerning the draft *Opinion Regarding the Settlement of the Phase Two Issues* (the “Proposed Decision” or “PD”).<sup>1/</sup>

The Proposed Decision adopts the Phase Two Settlement Agreement (“SA”), which resolves all issues set for Phase Two of this Biennial Cost Allocation Proceeding (“BCAP”).<sup>2/</sup> The SA represents agreement among all but one of the parties that submitted testimony in this proceeding (with agreement of other parties that actively participated without submitting testimony). In comments filed in response to the Joint Parties’ motion for adoption of the SA, Shell Energy North America (US), L.P. (“Shell”) asserted, *inter alia*, that firm storage capacity holders should be permitted to bump interruptible storage injections and withdrawals through all five nomination cycles, subject to the “elapsed pro rata” rule, and that SoCalGas should be directed to clarify Rule 30(D)(4) by allowing firm storage capacity holders to bump interruptible storage capacity through all five nomination cycles.<sup>3/</sup>

As discussed in more detail below, the Joint Parties firmly support the PD. The Joint Parties also support, in principle, Shell’s proposal described above. Indeed, the proposal reflects SoCalGas’ current practice, which permits firm storage capacity holders to use their firm contractual rights through all five nomination cycles in order to manage imbalances. For this reason, as the PD notes, the Joint Parties did not challenge this aspect of Shell’s comments.

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<sup>1/</sup> In accordance with Rule 1.8(d), counsel for SDG&E and SoCalGas has been authorized to sign these comments on behalf of each of the Joint Parties.

<sup>2/</sup> The PD does not adopt the provision of the SA related to filing of additional briefs on the issue of whether SDG&E and SoCalGas shareholders should be at risk in the future for gas throughput. *See* PD, p. 2.

<sup>3/</sup> *See id.* at pp. 29-30.

There exists a risk, however, that implementation of the specific modifications to Rule 30(D)(4) proposed in the PD could create confusion regarding application of the Rule. Accordingly, the Joint Parties propose that the PD be revised slightly to provide more effective direction to SoCalGas regarding modification of Rule 30(D)(4).

## II. DISCUSSION

As noted above, the PD adopts Shell's recommendation regarding the utilization of firm storage capacity through all five nomination cycles. Shell's proposal is premised on the notion that firm storage capacity holders should be able to use their firm contractual rights through all five nomination cycles.<sup>4/</sup> In its present form, Rule No. 30 (D) (4) provides as follows:

### 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. The Utility will use the following rules to limit the nominations to the storage maximums.

- Nominations using Firm rights will have first priority.
- All other nominations using Interruptible rights will have second priority, pro-rated if over-nominated based on the daily volumetric price paid.
- ***Firm rights can "bump" interruptible scheduled quantities through the Intraday 2 cycle.***
- Interruptible scheduled quantities will not be bumped in Intraday 3 cycle.
- ***Firm storage nominations made during Intraday 3, in accordance with Section D.3., will be accepted.***

Scheduling of storage capacity will be pro rata within each scheduling cycle, except for the Intraday 3 cycle, whenever the available capacity is less than the total nominations for each of the respective services and in the priority order established. Notice to bumped parties will be provided via the Transactions module in EBB. Bumping is subject to the NAESB elapsed prorata rules.

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<sup>4/</sup> See Shell Opening Comments, p 15.

This language was approved by the Commission through an Energy Division Disposition Letter, dated June 18, 2008, placing into effect SoCalGas' Advice Letter 3818-A. Shell did not protest Advice Letter 3818-A at the time it was filed; nor did it suggest that the language of the Rule was vague or unclear.

The Rule expressly provides that storage nominations scheduled under interruptible storage rights ("IT storage") will be bumped, subject to the elapsed pro rata rule, through the Intraday ("ID") 2 cycle (see highlighted Rule text above). This provision prevents prior scheduled IT storage from impeding the ability of customers with firm storage rights to use their firm rights. Thus, Shell's stated concerns are already addressed in Rule 30(D)(4).

Cycle 5 (ID3) was adopted by the Commission in D.07-12-019 as an accounting-only cycle; it is not a standard North American Energy Standards Board (NAESB) scheduling cycle for operational considerations. As stated in Rule 30(D)(4), firm storage capacity nominations will be accepted in ID3. This is in addition to permitting prior scheduled interruptible storage capacity nominations to avoid being bumped in ID3. Because SoCalGas already applies Rule 30(D)(4) in a manner that recognizes firm storage rights over interruptible storage rights, there is no need to address Cycle 5 bumping of interruptible storage in order to allow holders of firm storage customers to utilize their contractual rights.

The current Rule 30 secures for firm storage capacity holders precisely what Shell proposes, thus no change in operational procedure is warranted in the instant case. The Joint Parties agree, however, that, revisions to Rule 30 language for the purpose of clarifying the application of the Rule can be made to address the concern raised by Shell and discussed in the PD. Accordingly, the PD should be revised to delete the discussion of "bumping" interruptible storage capacity and should instead require SoCalGas to revise its tariff to further clarify in its

Rule 30(D)(4) that firm storage capacity holders are able to utilize their applicable firm storage capacity rights through all five nomination cycles.

The Joint Parties recommend the following revisions to the PD:

Page 30 of Proposed Decision:

We will direct SoCalGas to **further** clarify **in** its Rule 30(D)(4) **that** ~~to allow a~~ firm storage capacity holder **is able to utilize its applicable firm capacity rights** ~~to bump interruptible storage capacity~~ through all five nomination cycles.

Conclusions of Law:

2. SoCalGas should be directed in its implementation advice letter to revise its tariff to **further** clarify **in** its Rule 30(D)(4) **that** ~~to allow a~~ firm storage capacity holder **is able to utilize its applicable firm capacity rights** ~~to bump interruptible storage capacity~~ through all five nomination cycles.

Ordering Paragraphs:

4. Within 30 days from today's date, San Diego Gas & Electric Company and Southern California Gas Company shall file an advice letter with the Energy Division under Tier 2 of General Order 96-B to implement and carry out the terms and conditions of the Settlement Agreement, and to present the necessary tariff revisions.

a. Any interested party may protest the advice letter filing as provided for in General Order 96-B.

b. In its advice letter filing, Southern California Gas Company must clarify **that** its Rule 30(D)(4) ~~to allow~~ a firm storage capacity holders **to utilize its applicable firm capacity rights** ~~to bump interruptible storage capacity~~ through all five nomination cycles.

#### IV. CONCLUSION

The Joint Parties firmly support the PD and request that the Commission expeditiously approve the SA. The SA resolves each and every Phase II issue in a manner that reflects a compromise among the litigation positions taken by the Joint Parties in this proceeding, with an

outcome that promotes the public interest. For all the foregoing reasons, the Joint Parties urge the Commission to adopt the PD with the modifications described herein.

Respectfully submitted this 19<sup>th</sup> day of October, 2009.

By: /s/ Aimee M. Smith  
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October 19, 2009

## CERTIFICATE OF SERVICE

I hereby certify that a copy of **JOINT COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), THE DIVISION OF RATEPAYER ADVOCATES, SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), THE INDICATED PRODUCERS, THE SOUTHERN CALIFORNIA GENERATION COALITION, THE CITY OF LONG BEACH, SOUTHWEST GAS CORPORATION (U 095 G), WATSON COGENERATION COMPANY AND THE CALIFORNIA COGENERATION COUNCIL, THE CALIFORNIA MANUFACTURERS AND TECHNOLOGY ASSOCIATION, THE UTILITY REFORM NETWORK, BRIDGE HOUSING, AND THE ELECTRIC GENERATOR ALLIANCE ON PROPOSED DECISION** has been electronically mailed to each party of record on the service list in A.08-02-001. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the Commissioner Timothy A. Simon and the Assigned Administrative Law Judge John S. Wong.

Executed this 19<sup>th</sup> day of October, 2009 at San Diego, California.

*/s/ Jodi Ostrander*

Jodi Ostrander



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