

**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 REPLY 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 26, 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 reply comments concerning the draft *Opinion Regarding the Settlement of the Phase Two Issues* (the “Proposed Decision” or “PD”).^{1/}

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”).^{2/} In the SA, the Joint Parties agree, *inter alia*, to maintain the status quo approach to instituting operational flow orders (“OFOs”) on the SDG&E/SoCalGas system.^{3/} In comments filed on the PD, Shell Energy North America (US), L.P. (“Shell”) urges the Commission to reject the PD’s approval of this provision of the SA and proposes that a separate evidentiary hearing be held to consider the reasonableness of the current OFO protocol. In support of its proposal, Shell argues that “[t]he PD improperly failed, under Rule 12.1(d) to analyze the facts or weigh the evidence presented on the OFO issue.”^{4/} As discussed below, Shell’s claims lack merit and must be rejected.

As the PD notes, Shell previously raised its concerns regarding the SA’s proposed OFO provision in its response to the Joint Parties’ motion submitting the SA for Commission approval (the “Joint Motion”). Shell’s comments on the Joint Motion raised issues substantially identical to those raised in its comments on the PD and requested that the Commission hold a hearing to

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

^{2/} 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.

^{3/} SA § II.B.1.A.

^{4/} Opening Comments of Shell Energy North America (US), L.P. on Presiding Judge’s Proposed Decision, filed October 19, 2009 (hereinafter “Shell Comments on PD”), p. 1.

address the provisions of the SA that related to the OFO proposal.^{5/} The Commission denied Shell's hearing request, noting the absence of any material contested issue of fact.^{6/}

The PD correctly finds that the evidence presented by Shell in the instant proceeding fails to establish that the current SDG&E/SoCalGas OFO protocol is unreasonable.^{7/} The Joint Parties set forth a detailed rebuttal of Shell's claims regarding the current OFO protocol in their joint reply to Shell's comments on the Joint Motion. While these arguments are not repeated in full here, the Joint Parties note that the SA merely retains the status quo regarding the OFO protocol that has been in place for at least twelve years on the SDG&E/SoCalGas system, and that Shell has not presented a well-supported proposal or persuasive evidence concerning the need to revise the existing OFO trigger. Moreover, adoption of Shell's OFO proposal would require the institution of a "low OFO" trigger which would directly conflict with the provisions of the Phase One settlement in this proceeding and the Commission decision adopting that settlement.^{8/} For these reasons, several parties that share Shell's concerns regarding the frequency of OFOs agreed in the SA to support the continued use of the existing OFO trigger.

Shell's claim that the PD fails to conduct the analysis required under Rule 12.1(d) of the Commission's Rules of Practice and Procedure is unconvincing. Rule 12.1(d) requires that Commission approval of a settlement be based upon a finding that "the settlement is reasonable in light of the whole record, consistent with law, and in the public interest." In discussing the provision of the SA related to the OFO protocol, the PD provides a detailed accounting of the

^{5/} Opening Comments of Shell Energy North America (US), L.P. on Joint Motion for Adoption of Settlement Agreement, filed July 2, 2009 (hereinafter "Shell Comments on Joint Motion"), p. 5.

^{6/} Ruling of Assigned Commissioner and Administrative Law Judge Regarding the Request of Shell Energy for an Evidentiary Ruling, issued July 31, 2009, p. 6.

^{7/} PD, p. 24.

^{8/} See D.08-12-020, *mimeo*, pp. 23-24.

evidence submitted by each party, including Shell, regarding reasonableness of the current OFO protocol. Based on this evidence, the PD concludes that the OFO protocol agreed to in the SA is reasonable and in the public interest. Given the comprehensive nature of the PD's review of the evidence presented on the OFO protocol issue, it is not clear what further "analysis of the facts" Shell believes is required.^{9/} Shell cites no additional Rule or statutory provision establishing the more prescriptive standard of review it appears to suppose exists. Rule 12.1(d) relies upon the considered judgment of the Commission to determine reasonableness and to protect the public interest. The conclusion reached in the PD regarding reasonableness of the OFO protocol rests upon a reasoned and sound analysis of record evidence that clearly satisfies the requirements of Rule 12.1(d).

Finally, it is important to note that the SA is the result of committed negotiation and settlement efforts undertaken by all active parties in Phase II of the instant proceeding, except Shell. It represents an interconnected set of benefits and concessions reached through compromise on the part of all involved stakeholders. Shell's proposal that the Commission carve out and reject the particular provision of the SA that it does not support is unreasonable and must be denied. In addition to having failed to provide a valid basis for doing so, Shell's proposal ignores the fact that the provision in question is part of the integrated whole of the SA, and that unraveling the agreement reached by the Joint Parties does not serve the public interest. Accordingly, the Joint Parties respectfully request that the Commission reject Shell's request and that it expeditiously approve the SA with the modifications described in the Joint Parties' opening comments.

^{9/} See Shell Comments on PD, p. 4.

Respectfully submitted this 26th day of October, 2009.

By: /s/ Aimee M. Smith
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CERTIFICATE OF SERVICE

I hereby certify that a copy of **JOINT REPLY 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** 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 26th day of October, 2009 at San Diego, California.

/s/ Jodi Ostrander

Jodi Ostrander



California Public
Utilities Commission

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