



FILED

02-28-11

04:59 PM

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

Application of Southern California gas Company)
and San Diego Gas & Electric Company to)
expand existing off system delivery authority)

A. 08-06-006

COMMENTS BY SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON THE PROPOSED DECISION

DOUGLAS K. PORTER
GLORIA M. ING
WALKER A. MATTHEWS III

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1999
Facsimile: (626) 302-3990
E-mail:Gloria.Ing@sce.com

Dated: February 28, 2011

SCE submits that the language in the PD needs to be clarified. There is no testimony in the record in Application No. 08-06-006 regarding the conditions under which the OSD rate could increase. Therefore, the Commission should eliminate SoCalGas’ ability to raise the OSD rate until the next cost allocation proceeding, when SoCalGas’ transportation rates are reviewed. This is consistent with the testimony of SCE’s witness Dr. Michael Alexander who recommended that “[c]onsideration of any changes to the off-system delivery charge should be made in a future Cost Allocation Proceeding.”² The PD states that “[t]he parties may revisit the rate cap for interruptible OSD in the applicants’ next cost allocation proceeding once more experience with such deliveries has occurred.”³ Based on the testimony of Dr. Alexander, SCE believes that the PD may have meant that parties may revisit the OSD charge in the next cost allocation proceeding. This would also be consistent with DRA’s recommendation in its brief, “DRA recommends that if the Commission allows SoCalGas /SDG&E to offer expanded OSDI as requested in the Application, that the Commission review any future OSDI rate-setting mechanism and SoCalGas/SDG&E’s OSDI protocol in SoCalGas/SDG&E’s next cost allocation proceeding.”⁴ It is worth noting that SoCalGas’ is due to file its next Cost Allocation Proceeding on September 1 of this year.

//
//
//
//
//
//
//
//

² Direct Testimony of SCE witness Dr. Alexander, p. 12, September 25, 2009.

³ PD, mimeo p. 24 (emphasis added).

⁴ Opening Brief of the Division of Ratepayer Advocates, p. 7.

SCE thus proposes that Conclusion of Law No. 8 be modified to read: “The base rate for interruptible OSD service shall be set at 5 cents per Dth, and allowed to be discounted to as low as 1.5 cents per Dth.” Similar modifications would have to be made to page 2 and to Section 3.3.2.2 of the PD.

Respectfully submitted,

DOUGLAS K. PORTER
GLORIA M. ING
WALKER A. MATTHEWS III

/s/ Gloria M. Ing

By: Gloria M. Ing

Attorneys for

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue

Post Office Box 800

Rosemead, California 91770

Facsimile: (626) 302-3990

Facsimile: (626) 302-3990

E-mail:Gloria.Ing@sce.com

February 28, 2011

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **COMMENTS ON SOUTHERN CALIFORNIA EDISON (U338-E) ON THE PROPOSED DECISION** on all parties identified on the attached service list. Service was effected by means indicated below:

Transmitting the copies via email to all parties who have provided an email address. First class mail will be used if electronic service cannot be effectuated.

Executed this 28th day of February, 2011, at Rosemead, California.

/s/Janice Velarde
Janice Velarde
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
(626) 302-4176



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A0806006 - SOCAL GAS AND SDG&E
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: FEBRUARY 8, 2011

[DOWNLOAD THE COMMA-DELIMITED FILE](#)
[ABOUT COMMA-DELIMITED FILES](#)

[Back to Service Lists Index](#)

Parties

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: TRANSWESTERN PIPELINE COMPANY

JOHN W. LESLIE, ESQ.
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: SHELL ENERGY NORTH AMERICA (US),
L.P.

JOEL L. GREENE
JENNINGS, STROUSS & SALMON, PLC
1350 I STREET, N.W., STE. 810
WASHINGTON, DC 20005-3305
FOR: SALT RIVER PROJECT AGRICULTURAL
IMPROVEMENT AND POWER DISTRICT

MARK A. MINICH
SENIOR COUNSEL
EL PASO CORPORATION-WESTERN PIPELINES
2 N. NEVADA AVENUE
COLORADO SPRINGS, CO 80903
FOR: EL PASO CORPORATION-WESTERN
PIPELINES

STEPHEN G. KOERNER
EL PASO CORPORATION - WESTERN PIPELINES
2 NORTH NEVADA AVE.
COLORADO SPRINGS, CO 80903
FOR: EL PASO CORPORATION

JOHN ELLIS
SDG&E AND SOCALGAS
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1034
FOR: SOUTHERN CALIFORNIA GAS COMPANY /
SAN DIEGO GAS & ELECTRIC COMPANY

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

KAVITA P. LESSER
SOUTH COAST AIR QUALITY MANAGEMENT DISTR
21865 COPLEY DRIVE
DIAMOND BAR, CA 91765-0940
FOR: SOUTH COAST AIR QUALITY MANAGEMENT
DISTRICT

DOUGLAS K. PORTER

WILLIAM D. RAPP

ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

ATTORNEY AT LAW
SEMPRA LNG
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101
FOR: SEMPRA LNG

EVELYN KAHL
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015
FOR: INDICATED PRODUCERS

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYER ADVOCATES

MICHEL PETER FLORIO
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

EDWARD G. POOLE
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2812
FOR: CALIFORNIA INDEPENDENT PETROLEUM
ASSOCIATION

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: QUESTAR SOUTHERN TRAILS PIPELINE
COMPANY

MICHAEL B. DAY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111-3133
FOR: KERN RIVER PIPELINE COMPANY

WILLIAM H. BOOTH
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
FOR: WOODSIDE NATURAL GAS, INC.

GREGGORY L. WHEATLAND
ELLISON SCHNEIDER & HARRIS L.L.P.
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: CLEARWATER PORT LLC

Information Only

DONALD C. LIDDELL
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY, CA 00000

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

TARYN CIARDELLA
SR. LEGAL SECRETARY
NV ENERGY
EMAIL ONLY
EMAIL ONLY, NV 00000

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

KELLY A. DALY
STINSON MORRISON HECKER LLP
1150 18TH ST., SUITE 800 N.W.
WASHINGTON, DC 20036
FOR: ARIZONA PUBLIC SERVICE COMPANY

KIRBY BOSLEY
JP MORGAN VENTURES ENERGY CORP.
700 LOUISIANA ST. STE 1000, 10TH FLR
HOUSTON, TX 77002

SHELLEY A. CORMAN
SR. VICE-PRESIDENT
TRANSWESTERN PIPELINE COMPANY, LLC
711 LOUISIANA STREET, SUITE 900
HOUSTON, TX 77002

SHEMEIKA S. LANDRY
SENIOR COUNSEL
TRANSWESTERN PIPELINE COMPANY, LLC
711 LOUISIANA STREET, SUITE 900
HOUSTON, TX 77002

W. WAYNE TOMLINSON
EL PASO CORPORATION- WESTERN PIPELINES
2 NORTH NEVADA AVE.
COLORADO SPRINGS, CO 80903

W. WAYNE TOMLINSON
EL PASO CORPORATION- WESTERN PIPELINES
2 NORTH NEVADA AVENUE
COLORADO SPRINGS, CO 80903

FOR: EL PASO CORPORATION

LAURIE K. BROWN
 PROJ. MGR., BUS. DEVELOPMENT
 KERN RIVER GAS TRANSMISSION COMPANY
 2755 E. COTTONWOOD PARKWAY, STE. 300
 SALT LAKE CITY, UT 84121

DAVID S. ANDERSEN
 SR. CORP COUNSEL
 QUESTAR PIPELINE COMPANY
 180 EAST 100 SOUTH, PO BOX 45360
 SALT LAKE CITY, UT 84145-0360

GAYLEN S. HAAG
 QUESTAR PIPELINE COMPANY
 180 EAST 100 SOUTH, PO BOX 45360
 SALT LAKE CITY, UT 84145-0360

L. BRADLEY BURTON
 MGR - FED REG AFFAIRS
 QUESTAR PIPELINE CO.
 180 EAST 100 SOUTH / PO BOX 45360
 SALT LAKE CITY, UT 84145-0360

KENNETH NORDLANDER
 ARIZONA PUBLIC SERVICE COMPANY
 400 N 5TH ST. MS 8974
 PHOENIX, AZ 85004

NORM SPOONER
 ARIZONA PUBLIC SERVICE
 410 N. 5TH ST.
 PHOENIX, AZ 85004

ROBERT R. TAYLOR
 SALT RIVER PROJECT
 PO BOX 52025, PAB 221
 PHOENIX, AZ 85072
 FOR: SALT RIVER PROJECT

LORI-LYNN PENNOCK
 SR. FUEL SUPPLY ANALYST
 MAIL STATION POBOO1
 6504 E. THOMAS ROAD
 SCOTTSDALE, AZ 85251
 FOR: SALT RIVER PROJECT AGRICULTURAL
 IMPROVEMENT AND POWER DISTRICT

CHRISOPHER A. HILEN
 NV ENERGY
 6100 NEIL ROAD
 RENO, NV 89511
 FOR: NV ENERGY

ROBERT L. PETTINATO
 L.A. DEPT. OF POWER & WATER-NAT. GAS GRP
 111 NORTH HOPE STREET, ROOM 1150
 LOS ANGELES, CA 90012-0100

DAVID J. GILMORE
 SOUTHERN CALIFORNIA GAS COMPANY
 555 WEST FIFTH STREET, GT-14E7
 LOS ANGELES, CA 90013

JEFFREY L. SALAZAR
 SOUTHERN CALIFORNIA GAS COMPANY
 555 WEST FIFTH STREET, GT14D6
 LOS ANGELES, CA 90013

KARI KLOBERDANZ
 SOUTHERN CALIFORNIA GAS COMPANY
 555 WEST 5TH STREET, GT14D6
 LOS ANGELES, CA 90013-1011
 FOR: SOUTHERN CALIFORNIA GAS COMPANY

SCOTT A. LEHECKA
 ATTORNEY AT LAW
 HANNA AND MORTON LLP
 444 S. FLOWER STREET, 15TH FLOOR
 LOS ANGELES, CA 90071

ALANA STEELE
 ATTORNEY AT LAW
 HANNA AND MORTON, LLP
 444 SOUTH FLOWER STREET, SUITE 1500
 LOS ANGELES, CA 90071-2916

SYLVIA CANTOS
 HANNA AND MORTON LLP
 444 SOUTH FLOWER STREET, SUITE 1500
 LOS ANGELES, CA 90071-2916

HANS LAETZ, J.D.
 ZUMA IMPACT LLC
 6402 SURFSIDE WAY
 MALIBU, CA 90265

MICHAEL S. ALEXANDER
 ENERGY SUPPLY AND MANAGEMENT
 SOUTHERN CALIFORNIA EDISON
 2244 WALNUT GROVE AVE
 ROSEMEAD, CA 91006

REN ZHANG
 CITY OF PASADENA WATER AND POWER
 150 S. LOS ROBLES AVENUE, SUITE 200
 PASADENA, CA 91101

STEVE ENDO
 ATTN: STEVE ENDO
 CITY OF PASADENA WATER AND POWER
 150 S. LOS ROBLES AVENUE, SUITE 200
 PASADENA, CA 91101

ERIC KLINKNER
 PASADENA DEPARTMENT OF WATER AND POWER

STEVEN G. LINS
 ASSISTANT GENERAL MANAGER SUPPLY

150 SOUTH LOS ROBLES AVENUE, SUITE 200
PASADENA, CA 91101-2437

GLENDALE WATER AND POWER
141 N. GLENDALE AVENUE, LEVEL 4
GLENDALE, CA 91206-4394

BRUNO JEIDER
BURBANK WATER AND POWER
164 WEST MAGNOLIA BOULEVARD
BURBANK, CA 91502

RICHARD J. MORILLO
PO BOX 6459
BURBANK, CA 91510-6459

KURT R. WIESE
ATTORNEY AT LAW
SOUTH COAST AIR QUALITY MANAGEMENT DISTR
21865 COPELY DRIVE
DIAMOND BAR, CA 91765
FOR: SOUTH COAST AIR QUALITY MANAGEMENT
DISTRICT

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT, ROOM 370
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770

TRISTAN REYES CLOSE
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

WILLIAM TOBIN
SEMPRA GLOBAL
101 ASH STREET, HQ08C
SAN DIEGO, CA 92101

MARCIE A. MILNER
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO, CA 92121

JEFFREY M. GARBER
GENERAL COUNSEL
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BOULEVARD
IMPERIAL, CA 92251

MICHAEL E. CAMPBELL
INTERIM GENERAL MANAGER
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BOULEVARD
IMPERIAL, CA 92251

GEORGE DEHART
CITY OF ANAHEIM
200 SOUTH ANAHEIM BOULEVARD
ANAHEIM, CA 92805

STEVEN SCIORTINO
CITY OF ANAHEIM
200 SOUTH ANAHEIM BOULEVARD
ANAHEIM, CA 92805

SEEMA SRINIVASAN
ALCANTAR & KAHL LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015
FOR: INDICATED PRODUCERS

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

DIANE I. FELLMAN
NRG WEST
73 DOWNEY STREET
SAN FRANCISCO, CA 94117

HILARY CORRIGAN
CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. SUITE 303
SAN FRANCISCO, CA 94117-2242

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

JEFFERY D. HARRIS
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

ANNIE STANGE
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201

MIKE CADE
ALCANTAR & KAHL, LLP
1300 SW 5TH AVE, SUITE 1750
PORTLAND, OR 97201

State Service

JOHN S. WONG
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOYCE ALFTON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5212
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD A. MYERS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)