

Application No: A.14-06-  
Exhibit No.: \_\_\_\_\_  
Witness: Steve Watson

\_\_\_\_\_  
Application of Southern California Gas Company )  
(U 904 G) and San Diego Gas & Electric Company )  
(U 902 G) for Low Operational Flow Order and )  
Emergency Flow Order Requirements )  
\_\_\_\_\_

A.14-06-  
(Filed June 27, 2014)

**PREPARED DIRECT TESTIMONY OF**  
**STEVE WATSON**  
**SOUTHERN CALIFORNIA GAS COMPANY AND**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

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

June 27, 2014

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1 **PREPARED DIRECT TESTIMONY**

2 **OF STEVE WATSON**

3 **I. PURPOSE**

4 The purpose of my direct testimony on behalf of Southern California Gas Company  
5 (SoCalGas) and San Diego Gas & Electric Company (SDG&E) is to propose the replacement of  
6 SoCalGas and SDG&E's winter balancing rules with low Operational Flow Order (OFO) and  
7 Emergency Flow Order (EFO) requirements similar to those instituted by Pacific Gas and  
8 Electric Company (PG&E).

9 **II. LIMITATIONS OF EXISTING WINTER BALANCING RULES**

10 In December 2013 and again in February 2014, SoCalGas and SDG&E had to curtail  
11 standby procurement service.<sup>1</sup> During the February period, SoCalGas and SDG&E had to go  
12 further and institute emergency curtailment of electric generation (EG) customers on February 6  
13 and 7. Despite that emergency curtailment of end-use EG load, the California Independent  
14 System Operator (CAISO) had to call a FlexAlert. Prior to curtailing standby procurement  
15 service, SoCalGas and SDG&E were operating under their winter balancing, 5-day/50%  
16 balancing rules.<sup>2</sup> Under this regime, marketers, suppliers, and customers were able to profitably  
17 divert flowing supply to higher-value markets that were being affected by abnormally cold  
18 weather.<sup>3</sup> In both December 2013 and February 2014, this diversion of flowing supply led to  
19 over-reliance on storage withdrawals and pipeline draft to meet demand.<sup>4</sup> In both cases, in order  
20 to avoid widespread end-use customer curtailments, SoCalGas had to curtail standby

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<sup>1</sup> The curtailment of standby procurement service occurred between December 6-11, 2013, and February 6-10, 2014.

<sup>2</sup> See SoCalGas Rule 30, Section G.

<sup>3</sup> Slides 6 and 12 from attached Customer Forum Presentation (Attachment A) shows the abnormally cold conditions. Slides 7-9, 13-15 show the drops in flowing supply receipts and the price spikes in other parts of the country.

<sup>4</sup> Slides 19-22 from the attached Customer Forum Presentation (Attachment A) illustrate this.

1 procurement service. These curtailments eventually have \$100/dth noncompliance charges plus  
2 a standby procurement charge (150% of the highest SoCalGas border price index) for marketing  
3 agents who underdelivered by more than -10% of their customers' burn.

### 4 **III. PROPOSED LOW OPERATIONAL FLOW ORDER**

5 With the recent experience of December 2013 and February 2014, SoCalGas and  
6 SDG&E believe it is time to replace their winter balancing rules, which were instituted in 1998,  
7 with low OFO and EFO procedures similar to those on the PG&E system. SoCalGas and  
8 SDG&E believe the new low OFO and EFO procedures will minimize supply-related curtailment  
9 threats by ensuring that transportation customers do not use any more storage withdrawal than  
10 has been allocated for the purpose of balancing. The overuse of withdrawal for transportation  
11 balancing can jeopardize system reliability by exhausting SoCalGas' total withdrawal capability.  
12 As proposed by Ms. Musich, these new rules would become effective starting in January 2015.  
13 SoCalGas and SDG&E are not proposing in this Application to change its current high OFO  
14 procedures, even though those are different from PG&E's procedures. In addition, if both  
15 utilities had low OFO/EFO authority similar to PG&E's, SoCalGas and SDG&E could also  
16 eliminate the standby procurement curtailment step in its curtailment Rule 23 and Rule 14,  
17 respectively.

### 18 **IV. PG&E LOW OFO PROCESS**

19 PG&E's low OFO procedures are described in its Rule 14. Under its procedures,  
20 whenever PG&E forecasts that the next gas day's pipeline inventory (pack) will fall below 3,900  
21 MMcf,<sup>5</sup> it can call a Stage 1 through Stage 5 OFO for the next gas day.<sup>6</sup> This "trigger" indicates  
22 that PG&E has used all the assets it has dedicated to the balancing function — 75 MMcfd of

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<sup>5</sup> 4,000 MMcf if forecast demand exceeds 2,800 MMcf.

<sup>6</sup> It attempts to do this at least 12 hours before the next gas day.

1 storage withdrawal plus several hundred MMcf of pipeline draft.<sup>7</sup> Contrary to SoCalGas and  
 2 SDG&E's current rules, PG&E does not use any more storage withdrawal for the balancing  
 3 function than specifically allocated to that function.<sup>8</sup> Therefore, on the PG&E system, any  
 4 underdeliveries not met with customer-specific storage withdrawals or the 75 MMcf of storage  
 5 withdrawal dedicated to the balancing function will result in a reduction in pipeline inventory  
 6 (draft).

7 PG&E has wide discretion as to what stage low inventory OFO it calls for the next day.

8 Table 1 below summarizes PG&E's low system-wide, OFO experience.

9 **Table 1**

Stage	Tolerance	Average Tolerance	Noncompliance Charge	#OFOs (2012-3/31/2014)
1	Up to -25%	-6%	\$0.25/dth	22
2	Up to -20%	-7%	\$1.00/dth	6
3	Up to -15%	-5%	\$5.00/dth	4
4	Up to -5%	-5%	\$25.00/dth	4
5	Up to -5%	n/a	\$25.00/dth plus citygate	0
EFO	0%	0%	\$50/dth plus citygate	0

10 **A. Advantages of PG&E-like low OFO process vis-à-vis SoCalGas and SDG&E**  
 11 **winter balancing rules**

<sup>7</sup> The draft capability would be the prior day's pipeline inventory minus the 3,900 MMcf trigger. Theoretically, this could be as high as 600 MMcf or as low as zero.

<sup>8</sup> Under the 5-day, 50% balancing rule SoCalGas will often use more than 1 Bcfd of storage withdrawal for balancing low deliveries even though it has only 340 MMcf allocated to the balancing function.

1 One advantage of the PG&E low OFO approach is that it gives the operator the ability to  
2 institute tighter tolerances, when necessary, at almost any time during the winter. Under its  
3 winter balancing rules, however, SoCalGas and SDG&E are constrained to 5-day, 50%  
4 balancing for over 90% of its winter days. When inventories reach peak day + 20 Bcf, SoCalGas  
5 and SDG&E can implement 70% daily balancing, but all of PG&E's stages allow tighter  
6 tolerances than this. A second advantage of the PG&E low OFO approach is that it can be  
7 instituted at the beginning of any flow day throughout the year, not just during the winter.  
8 Higher and more volatile EG demands may require low OFOs during the summer, as well as  
9 during the winter.

10 An additional advantage of the PG&E approach from a customers' perspective is that the  
11 noncompliance charges for low OFOs are less onerous than the noncompliance charges that  
12 SoCalGas and SDG&E use when they curtail standby procurement. Pursuant to SoCalGas Rule  
13 23 and SDG&E Rule 14, SoCalGas and SDG&E charge \$100/dth after hour 8 for violations of  
14 standby procurement plus standby procurement charges. Under PG&E's low OFO procedures,  
15 customers are charged a maximum of \$25/dth. Another customer advantage of the PG&E  
16 approach is that it reduces the likelihood of end-use curtailment. While SoCalGas experienced  
17 transportation service curtailments in February 2014, PG&E got through the February period  
18 using Stage 4 low OFOs for February 6-8, without any curtailments. Under its low OFO  
19 procedures, PG&E may be inclined to call the low OFOs sooner than SoCalGas and SDG&E  
20 would curtail standby procurement because the former does not create as much market shock as  
21 does the latter. The sooner customers closely align their supplies with their burns, the less likely  
22 that operational issues develop that will necessitate the utility having to curtail end-use demand  
23 because of inadequate supply.

1           **B.       Disadvantage of the PG&E low OFO Approach**

2           With respect to SoCalGas and SDG&E, the disadvantage of the PG&E OFO approach is  
3 that it relies on up to 600 MMcf of pipeline pack/draft capability in its triggering mechanism.  
4 SoCalGas and SDG&E have only a third of such pack/draft capability and are unable to use this  
5 capability in either a high OFO or a low OFO triggering procedure. This inability was affirmed  
6 by the Commission over the protests of Shell Energy in D.09-11-006. Fortunately, SoCalGas  
7 and SDG&E can adopt PG&E’s low OFO procedures without using linepack in the trigger  
8 calculation, as further explained in Section V below.

9           **V.       SOCALGAS AND SDG&E LOW OFO PROPOSAL**

10           PG&E triggers a low OFO when it forecasts its 75 MMcfd of storage withdrawal  
11 allocated to balancing and its available draft (subject to the minimum 3,900 MMcf inventory  
12 figure) will be exhausted.<sup>9</sup> SoCalGas and SDG&E propose to trigger a low OFO when they  
13 forecast that the 340 MMcfd of storage withdrawal allocated to balancing will be exhausted. If  
14 forecast receipts – forecast sendout – forecast withdrawal scheduled from storage accounts  
15 (negative number) < 340 MMcfd, then a low OFO is called. SoCalGas and SDG&E’s limited  
16 drafting capability is excluded from the triggering mechanism.

17           SoCalGas currently has in its Envoy system under the Public Page, “Informational  
18 Postings,” “Operations,” “Daily Operations Tab” a line labeled “storage injection (withdrawal)  
19 for customer balancing” that shows how much storage withdrawal was actually used for the  
20 balancing function and how much is forecast to be used for the following days.<sup>10</sup> The forecasted  
21 number represents forecasted physical withdrawal minus recent withdrawal nominations from  
22 storage accounts — that is, storage withdrawal being used for the balancing function. In order to

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<sup>9</sup> PG&E is proposing to allocate 200 MMcfd of storage withdrawal to the balancing function in its next Gas Accord. PG&E A.13-12-012, pp. 10-48 through 10-50.

<sup>10</sup> See example of this current Envoy posting in Attachment B.

1 improve market transparency and forecasting accuracy, SoCalGas would post the elements of  
2 this calculation on Envoy several times each day.<sup>11</sup> Also, SoCalGas and SDG&E would propose  
3 to call a low OFO by 5 A.M, Pacific time, in time for cycle 3 scheduling on flow day.

4 SoCalGas and SDG&E are proposing OFO stages and an EFO stage exactly like those in  
5 PG&E's system. The stages are presented in Table 2 below. The stage level called by SoCalGas  
6 and SDG&E would depend on the level of noncompliance charge level that the utilities believe  
7 necessary to incent customers/suppliers to more closely match supply and demand.<sup>12</sup> SoCalGas  
8 and SDG&E will not provide tolerances greater than those permitted with 340 MMcf/d of  
9 withdrawal capacity.

10 **Table 2**

Stage	Tolerance	Noncompliance Charge
1	Up to -25%	\$0.25/dth
2	Up to -20%	\$1/dth
3	Up to -15%	\$5.00/dth
4	Up to -5%	\$25.00/dth
5	Up to -5%	\$25/dth plus daily balancing standby rate <sup>13</sup>
EFO	Zero	\$50/dth plus daily balancing standby rate

11 Looking back on the experience in December 2013 and February 2014, had SoCalGas  
12 and SDG&E possessed this authority, a low OFO day would have been called for December 5

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<sup>11</sup> See illustrative example of informational postings in Attachment C.

<sup>12</sup> Market conditions such as those in December 2013 or February 2014 would certainly demand a Stage 3 or Stage 4 OFO because of the price spikes for natural gas in other parts of the country over those periods.

<sup>13</sup> This rate is described in the testimony of Mr. Borkovich. It is the *higher of* SCG Citygate, PG&E Citygate, EP-Permian, EP-SJ Bondad, or Opal Plant Tailgate.



1 and 6 and might have helped avoid the standby procurement curtailment called for December  
2 6.<sup>14</sup> Two more low OFO days would have been called for February 1 and February 6.<sup>15</sup>

## 3 **VI. RELATED ISSUES**

### 4 **A. Emergency OFOs**

5 Except for an unusual circumstance during bankruptcy, PG&E has not had to use EFO  
6 procedures, and SoCalGas and SDG&E do not envision calling an EFO on its system either, as  
7 long as the noncompliance charges for OFO Stages 4 and 5 are sufficiently high. SoCalGas and  
8 SDG&E believe that their noncompliance charges for OFO Stages 4 and 5 as presented in Table  
9 2 are sufficiently high. Nevertheless, like PG&E, SoCalGas and SDG&E could invoke EFOs  
10 when they forecast or actually experience a supply and/or capacity shortage that threatens  
11 deliveries to end-use customers.

### 12 **B. Interruptible withdrawal on low OFO days**

13 SoCalGas and SDG&E believe that some level of interruptible withdrawal can be used to  
14 meet the delivery tolerances specified in a low OFO. The maximum quantity of interruptible  
15 rights that could be sold on low OFO days would be:  $50\% \times (\text{Withdrawal Capacity} - \text{Firm}$   
16  $\text{storage withdrawal nominations} - 340 \text{ MMcfd})$ . The 50% factor will ensure that withdrawal  
17 limits are not reached and that increases in supply to match burns have a mix of storage and  
18 flowing supply in order to maintain system reliability. It would also allow firm withdrawal  
19 customers to increase their intraday cycle nominations without being unduly restricted by  
20 elapsed pro rata rules for any previously scheduled interruptible withdrawals.

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<sup>14</sup> See Attachment A, Slide 21.

<sup>15</sup> See Attachment A, Slide 19.

1           **C.     No Customer-Specific Low OFOs**

2           In its Rule 14, PG&E has rules for customer-specific, as opposed to system-wide, low  
3           OFOs. These specific rules are seldom used, however, and are often ineffective when used.<sup>16</sup>  
4           This has certainly been SoCalGas and SDG&E’s experience with customer-specific high OFOs.  
5           Therefore, the utilities are not proposing customer-specific low OFOs at this time.

6           **D.     Storage Assets Allocated to Balancing**

7           The frequency of OFOs under the PG&E approach is related to the size of the assets  
8           allocated to the balancing function. From April 1, 2013, to March 31, 2014, PG&E had 24 low  
9           OFOs. Assuming a 340 MMcfd trigger for low OFOs and assuming that actual balancing  
10          activity was forecasted accurately, SoCalGas estimates that it would have had 41 low OFOs over  
11          that same period.<sup>17</sup> This likely overstates the frequency of low OFOs since customers will likely  
12          use more storage or schedule more out-of-state supplies under SoCalGas’ new, PG&E-like  
13          balancing regime.

14          The assets allocated to the balancing function on SoCalGas’ system are currently set  
15          through the year 2015.<sup>18</sup> However, in the future, SoCalGas would be amenable to considering an  
16          increase to its balancing assets. An increase in storage withdrawal allocated to the balancing  
17          function could decrease the frequency of OFOs.<sup>19</sup> In addition, allocating more withdrawal to the  
18          balancing function would allow wider tolerances to be accommodated when a low OFO was

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<sup>16</sup> Any specific customer with an “imbalance” can trade their “imbalance” to a non-targeted customer, resulting in the continued drafting of pipeline inventory. Almost half the time PG&E’s customer-specific OFOs are followed by system-wide OFOs the next day. And often those customer-specific OFOs involve 8-9 very large marketers rather than just 1-2 specific customers.

<sup>17</sup> See Spreadsheet Attachment D.

<sup>18</sup> D.09-11-006, D.14-06-007.

<sup>19</sup> From April 1, 2013 to March 31, 2014, SoCalGas would have had the same number of OFOs, 24, that PG&E experienced, if it had 500 MMcfd of withdrawal allocated to the balancing function. See Spreadsheet Attachment D.

1 called. PG&E has requested in its pending Gas Accord to allocate more storage withdrawal (200  
2 MMcfd/d rather than 75 MMcfd/d) to its balancing function.<sup>20</sup>

3 **VII. QUALIFICATIONS**

4 My name is Steve Watson. I am employed by SoCalGas as the Capacity Products Staff  
5 Manager. My business address is 555 West Fifth Street, Los Angeles, California, 90013-1011. I  
6 received a Bachelor's degree in History and International Relations from the University of  
7 California, Davis, and a Master's Degree in Public Policy from the University of California,  
8 Berkeley. I have been employed by SoCalGas since 1986. I have worked in Gas Supply,  
9 Customer Services, the Strategic Planning and Transmission Capacity Planning Departments. I  
10 am currently the Capacity Products Staff Manager, responsible for staff support to our Pipeline  
11 Products Manager and Storage Products Manager. Before joining SoCalGas I worked as a  
12 natural gas analyst at the Department of Energy.

13 I have previously testified before the California Public Utilities Commission.

14 This concludes my prepared direct testimony.

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<sup>20</sup> PG&E A.13-12-012, pp. 10-48 through 10-50.

# **Attachment A**



# 2014 Customer Forum

May 8, 2014



Southern  
California  
Gas Company



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# Agenda

- Introductions
- Antitrust Disclaimer
- Curtailment Events
  - December 2013 Curtailment
  - February 2014 Curtailment
- Low OFO Proposal
- Review of April 2013 to March 2014
  - Minimum Flow Requirements
  - Southern System Requests
- High OFO Review
- Additional Tools/System Improvements
- Electric – Gas Coordination
- Post Forum Report to be filed no later than July 7, 2014

## AMERICAN GAS ASSOCIATION ANTITRUST COMPLIANCE GUIDELINES

### Introduction

The American Gas Association and its member companies are committed to full compliance with all laws and regulations, and to maintaining the highest ethical standards in the way we conduct our operations and activities. Our commitment includes strict compliance with federal and state antitrust laws, which are designed to protect this country's free competitive economy.

### Responsibility for Antitrust Compliance

Compliance with the antitrust laws is a serious business. Antitrust violations may result in heavy fines for corporations, and in fines and even imprisonment for individuals. While the General Counsel's Office provides guidance on antitrust matters, you bear the ultimate responsibility for assuring that your actions and the actions of any of those under your direction comply with the antitrust laws.

### Antitrust Guidelines

In all AGA operations and activities, you must avoid any discussions or conduct that might violate the antitrust laws or even raise an appearance of impropriety. The following guidelines will help you do that:

- **Do** consult counsel about any documents that touch on sensitive antitrust subjects such as pricing, market allocations, refusals to deal with any company, and the like.
- **Do** consult with counsel on any non-routine correspondence that requests an AGA member company to participate in projects or programs, submit data for such activities, or otherwise join other member companies in AGA actions.
- **Do** use an agenda and take accurate minutes at every meeting. Have counsel review the agenda and minutes before they are put into final form and circulated and request counsel to attend meetings where sensitive antitrust subjects may arise.
- **Do** provide these guidelines to all meeting participants.

- **Do not, without prior review by counsel,** have discussions with other member companies about:

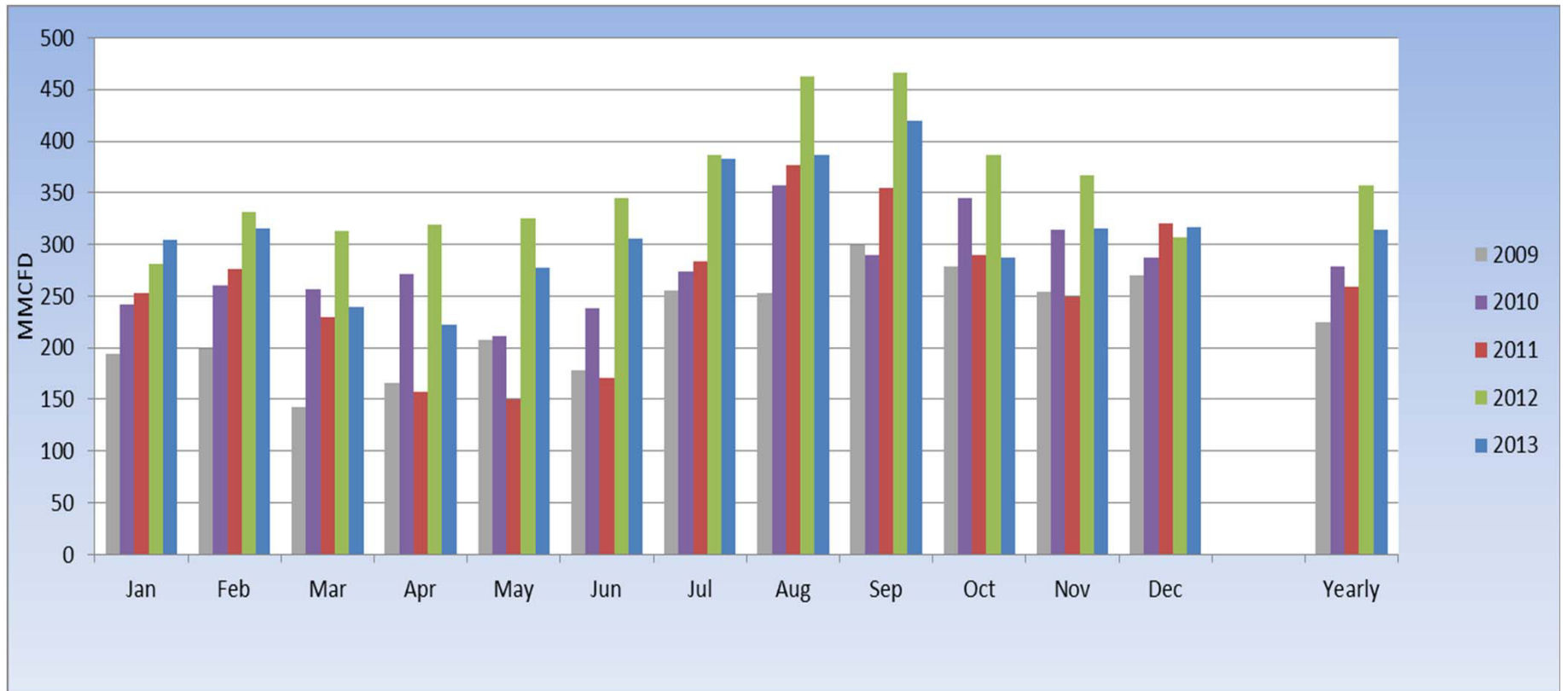
- your company's prices for products, assets or services, or prices charged by your competitors
  - costs, discounts, terms of sale, profit margins or anything else that might affect those prices
  - the resale prices your customers should charge for products or assets you sell them
  - allocating markets, customers, territories products or assets with your competitors
  - limiting production
  - whether or not to deal with any other company
  - any competitively sensitive information concerning your own company or a competitor's.
- **Do not** stay at a meeting, or any other gathering, if those kinds of discussions are taking place.
  - **Do not** discuss any other sensitive antitrust subjects (such as price discrimination, reciprocal dealing, or exclusive dealing agreements) without first consulting counsel.
  - **Do not** create any documents or other records that might be misinterpreted to suggest that AGA condones or is involved in anticompetitive behavior.

### We're Here to Help

Whenever you have any question about whether particular AGA activities might raise antitrust concerns, contact the General Counsel's Office, Ph: (202) 824-7072; E-mail: [GCO@aga.org](mailto:GCO@aga.org), or your legal counsel.

American Gas Association  
Office of General Counsel  
Issued: December 1997  
Revised: December 2008

# SoCalGas/SDG&E Southern System EG Daily Average Has Increased Post-SONGS

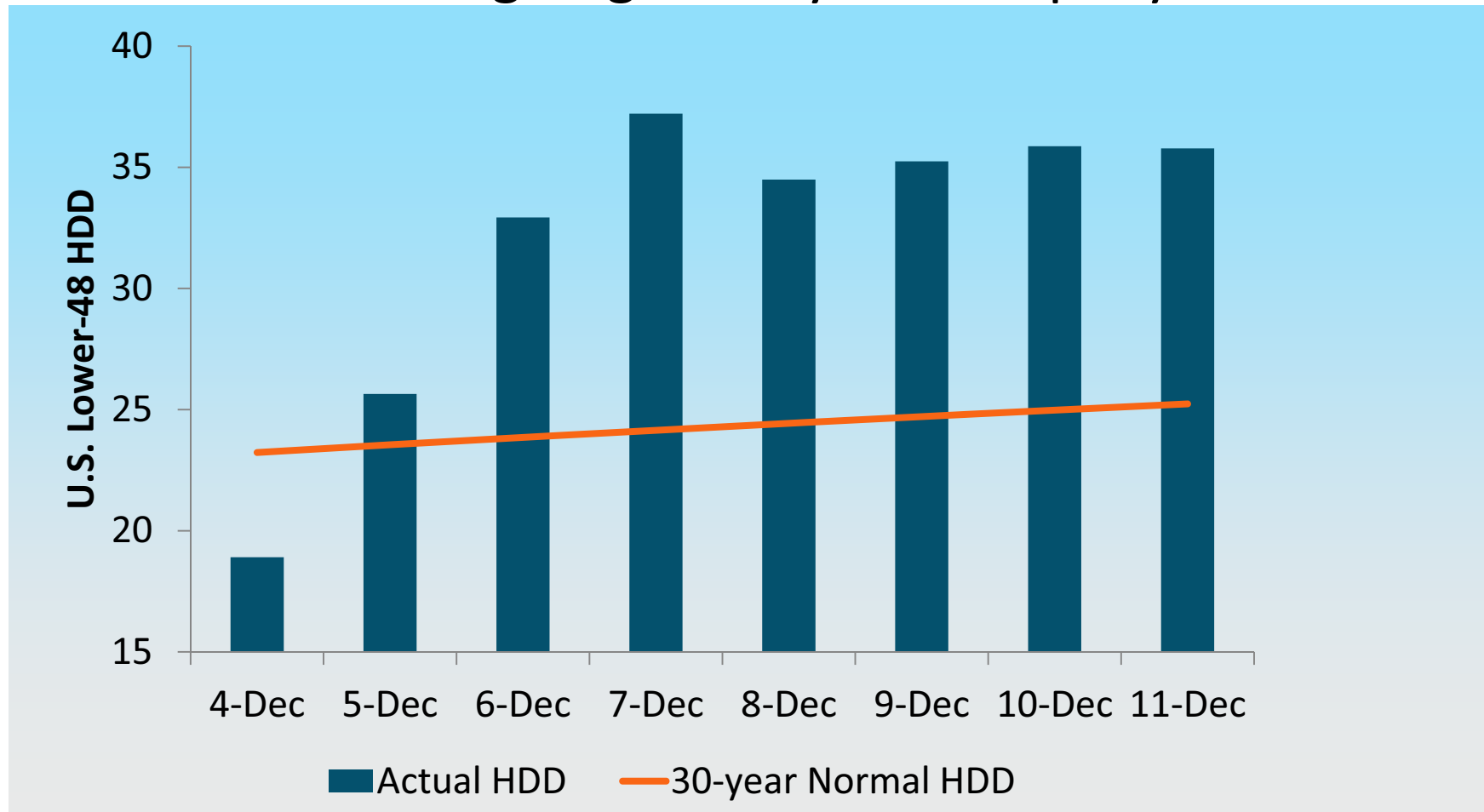




# December 2013 Curtailment

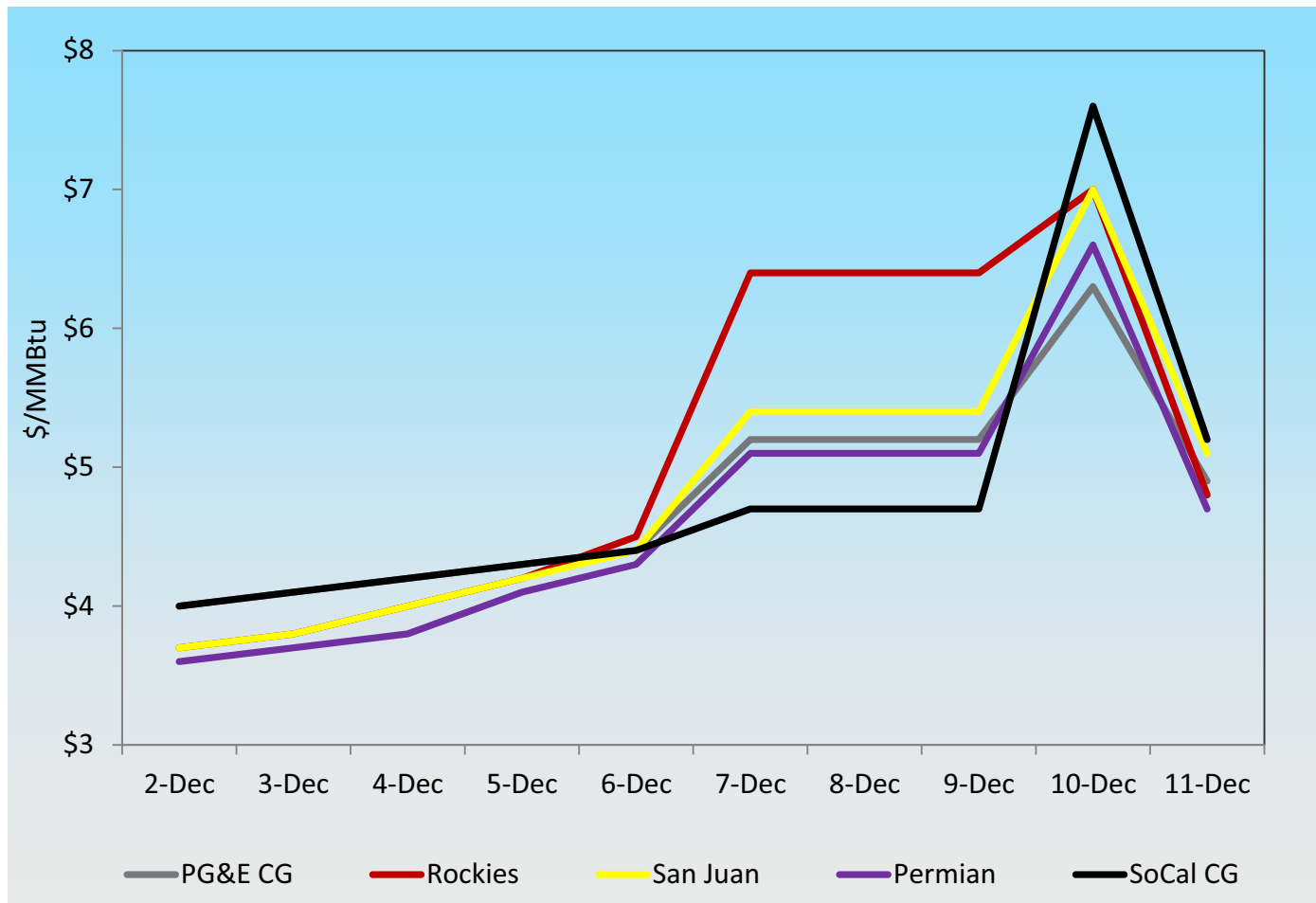
- December 5
  - Gas prices east of California (EOC) begin to rise above SoCalGas border as Winter Storm Cleon starts hitting the western US
- December 6
  - As prices continue to rise EOC, customer deliveries into SoCalGas are 1.6 BCF with a sendout of 4.4 BCF and SoCalGas calls for curtailment of standby service
- December 6-11
  - Cold weather blankets southern California with high core loads as well as high EG utilization
- December 9-10
  - Gas Control works closely with CAISO to move the EG load off of the severely taxed SDG&E and LA basin plants to areas that are closer to the storage fields
  - SoCalGas and SDG&E call for conservation of both gas and electric

## Nationally, from December 4<sup>th</sup> to the 7<sup>th</sup> Heating Degree Days rose rapidly

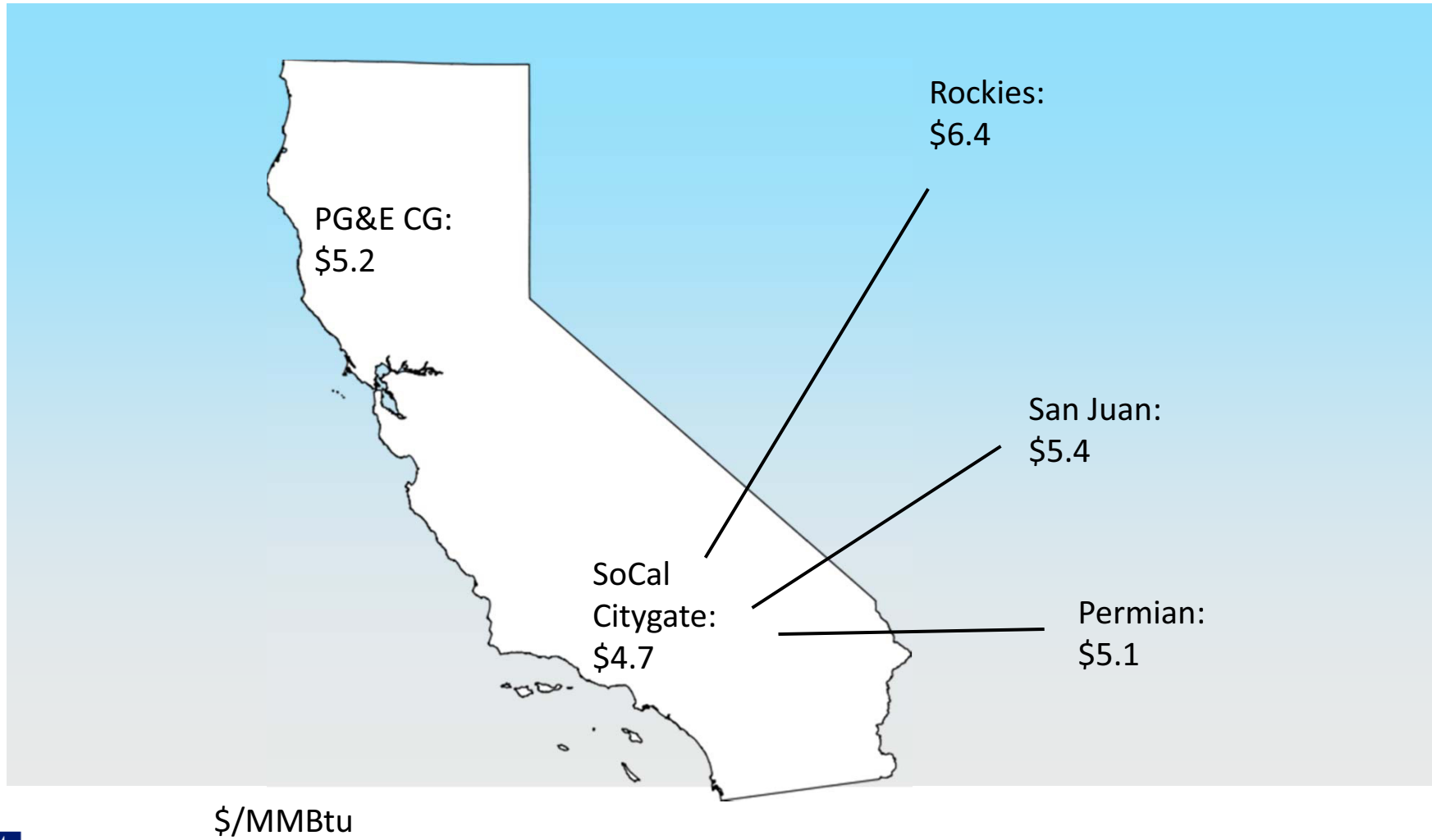


Source: Thomson Reuters

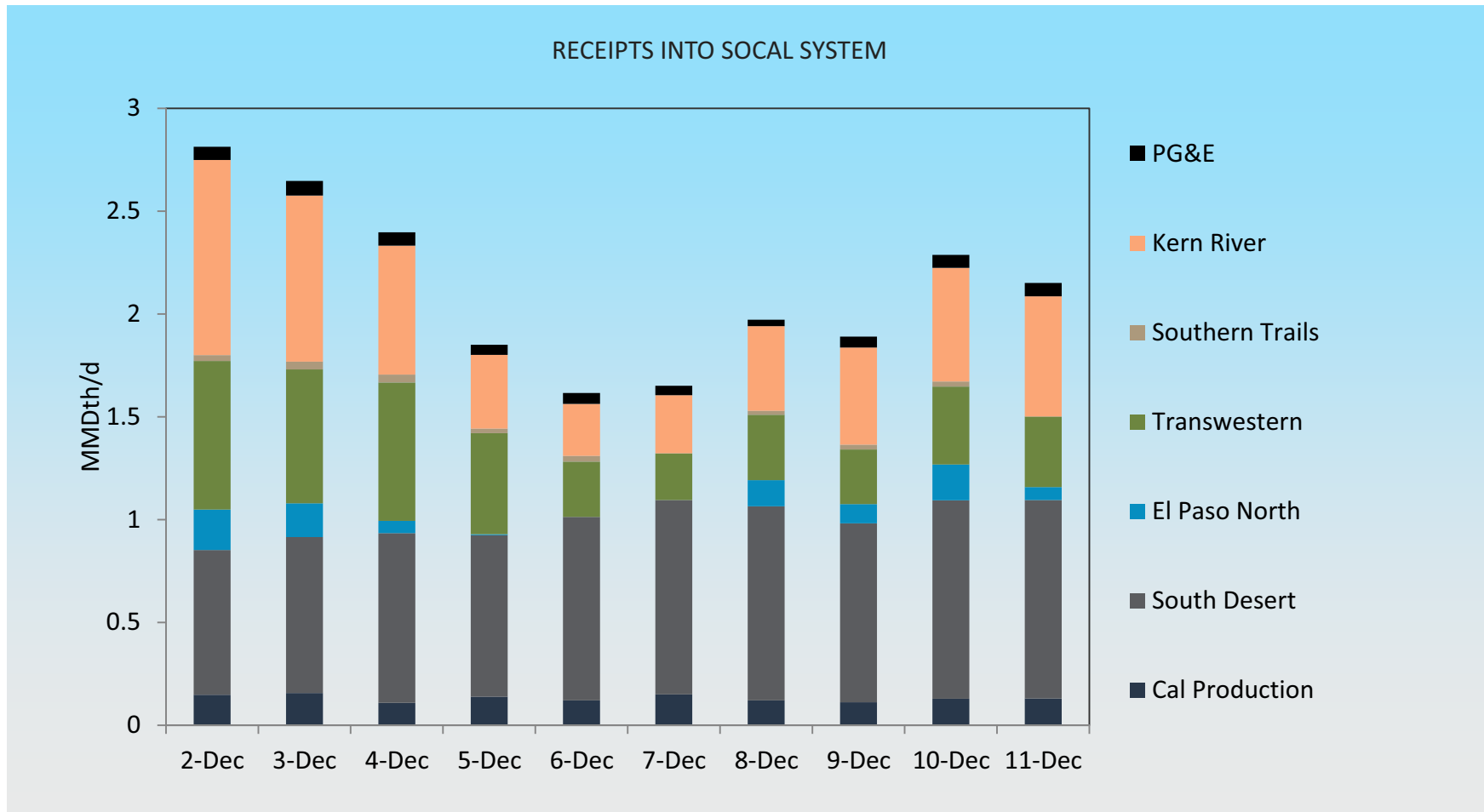
By Dec 6<sup>th</sup>, Marketers had already begun diverting supplies to higher-valued markets east of California



# Dec 7, 2013 Gas Prices

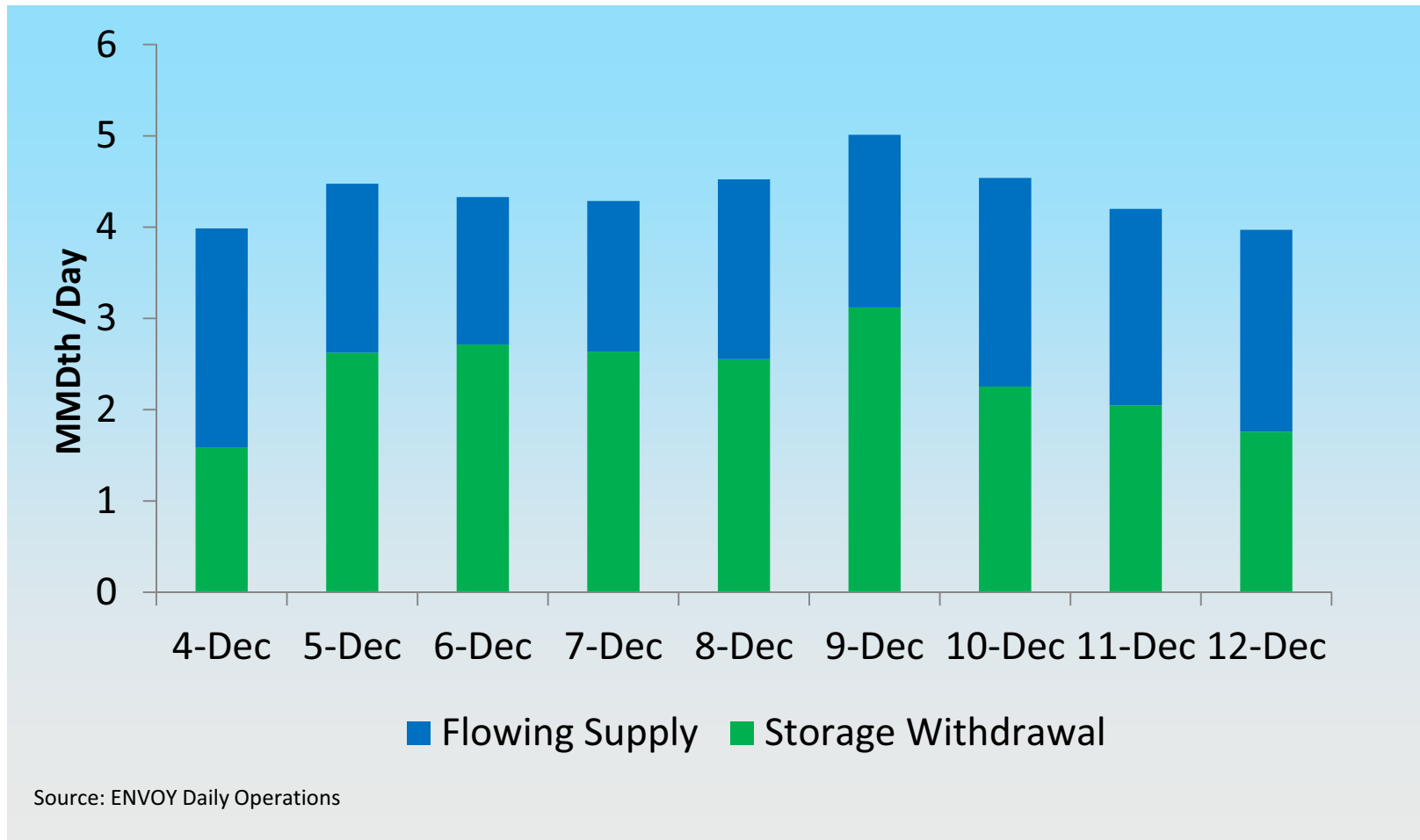


# Receipts decline as prices spike elsewhere – Dec. 2013



Source: Envoy Daily Operations

# Withdrawal Peaked at 62% of Send Out

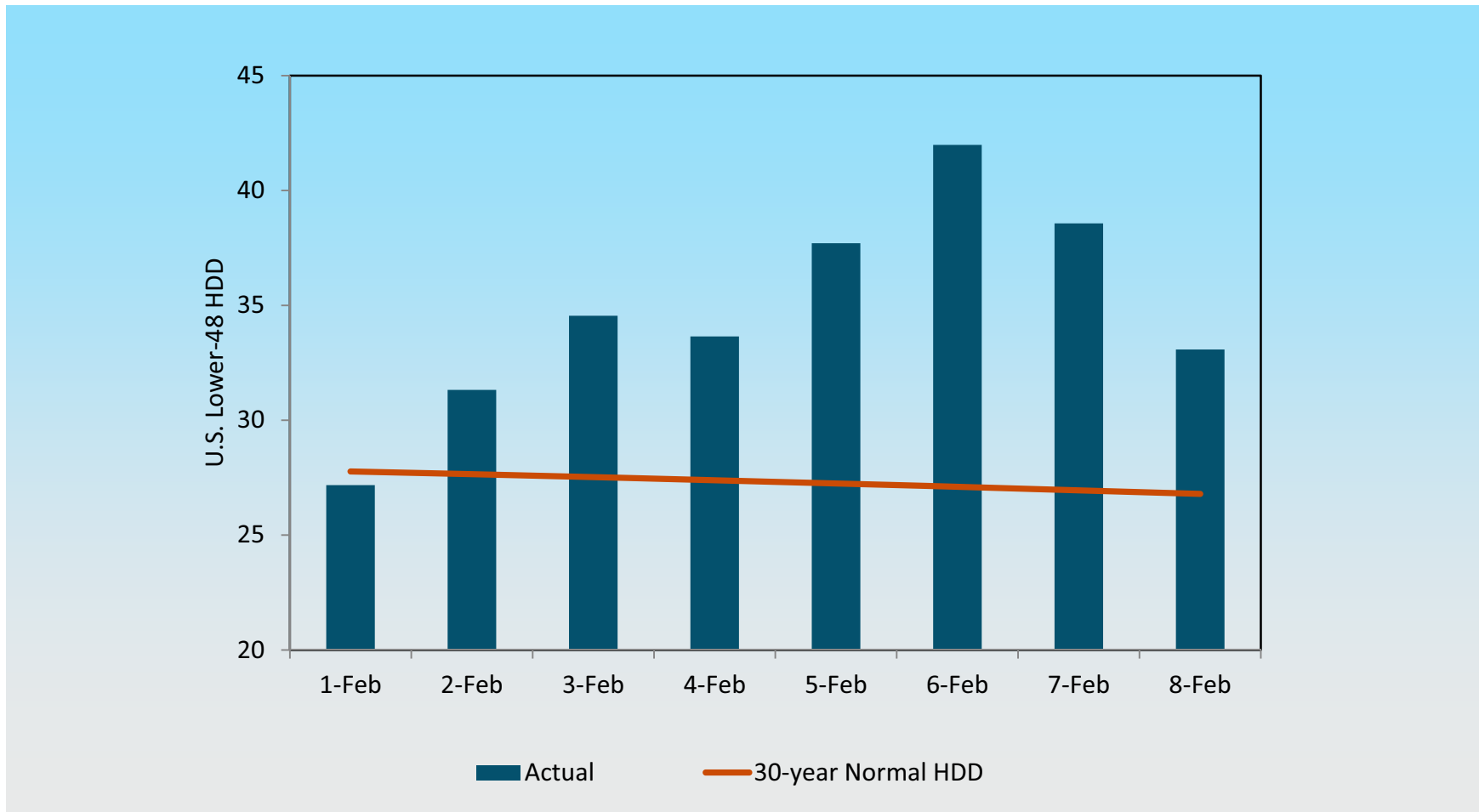


# February 2014 Curtailment

## February 4-10

- Average temperature in the lower 48 states fell significantly below normal
- High demand outside California created negative spreads between Southern California and upstream supply zones causing receipts into the SoCalGas system to fall
- In California gas demand for power generation was also boosted by outages in Diablo Canyon units 1 and 2
- **February 6**
- SoCalGas and SDG&E issued an emergency localized curtailment for electric generation customers
- Curtailment of Standby Service called
- SoCalGas worked with CAISO and LADWP to cut and shift load to other areas
- CAISO issues a FlexAlert

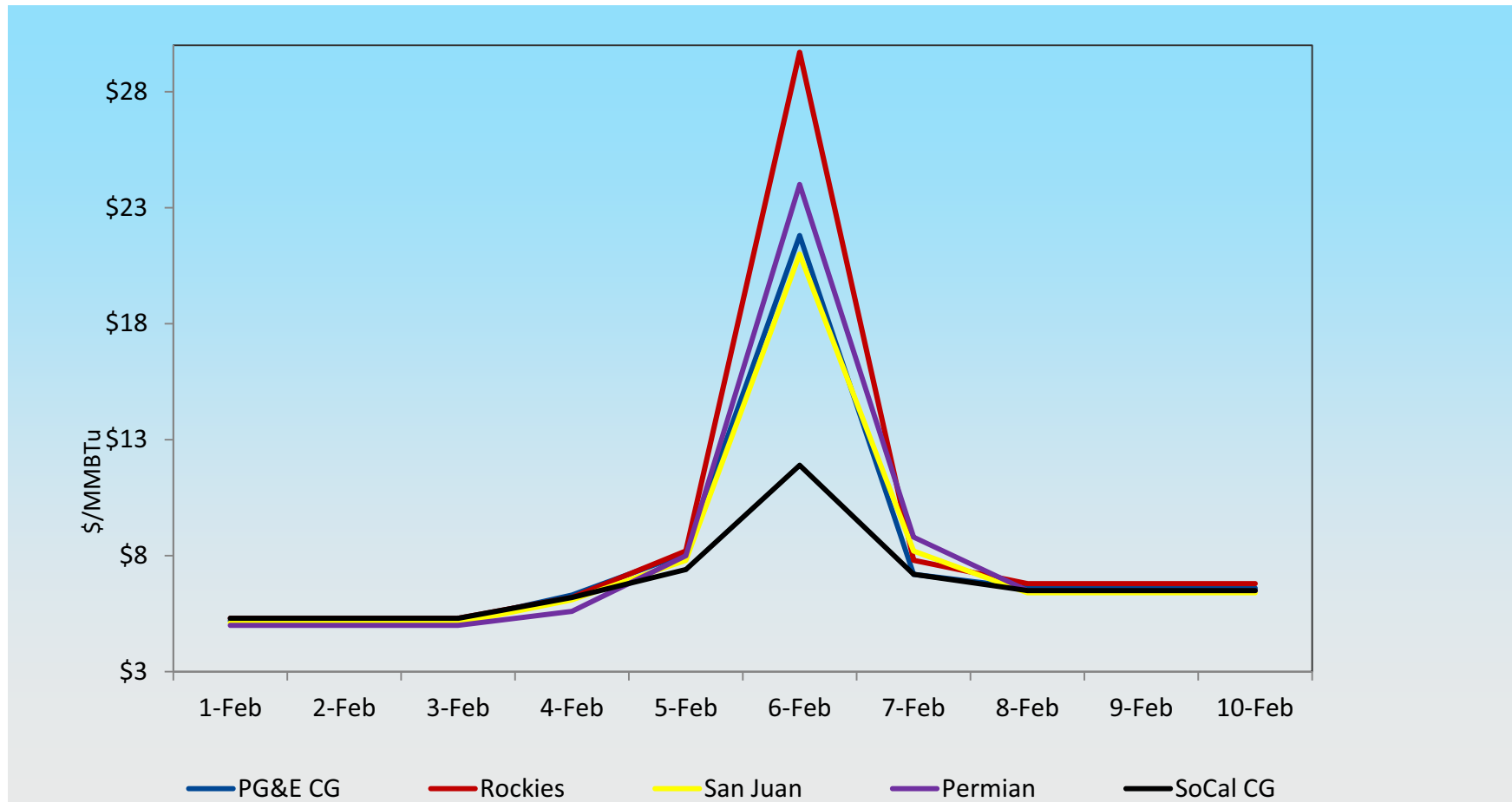
# Nationally, from February 1st to the 6<sup>th</sup> Heating Degree Days rose rapidly



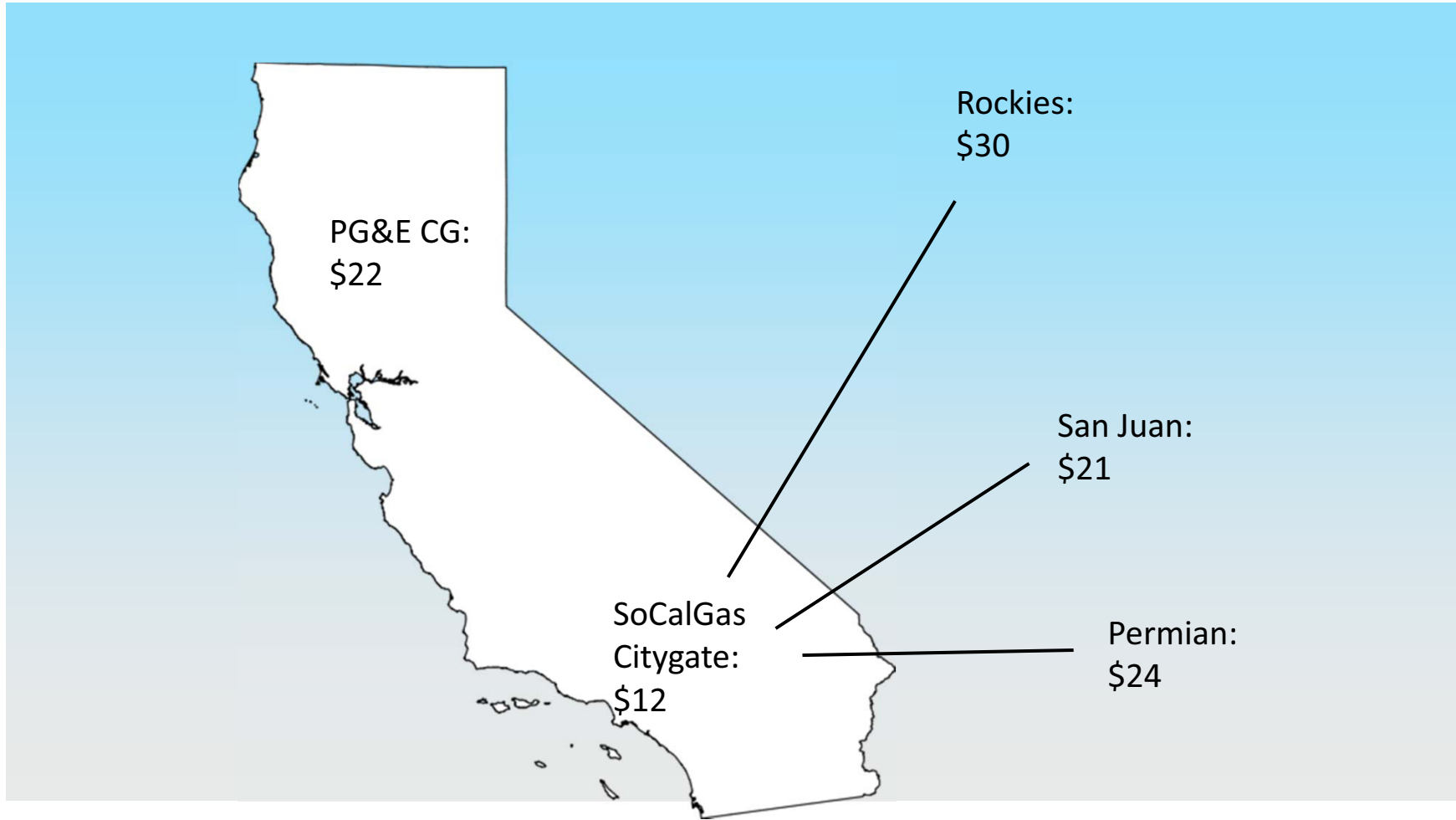
Source: Thomson Reuters



# By Feb 5<sup>th</sup>, marketers had begun diverting supplies to Higher-Valued Markets east of California

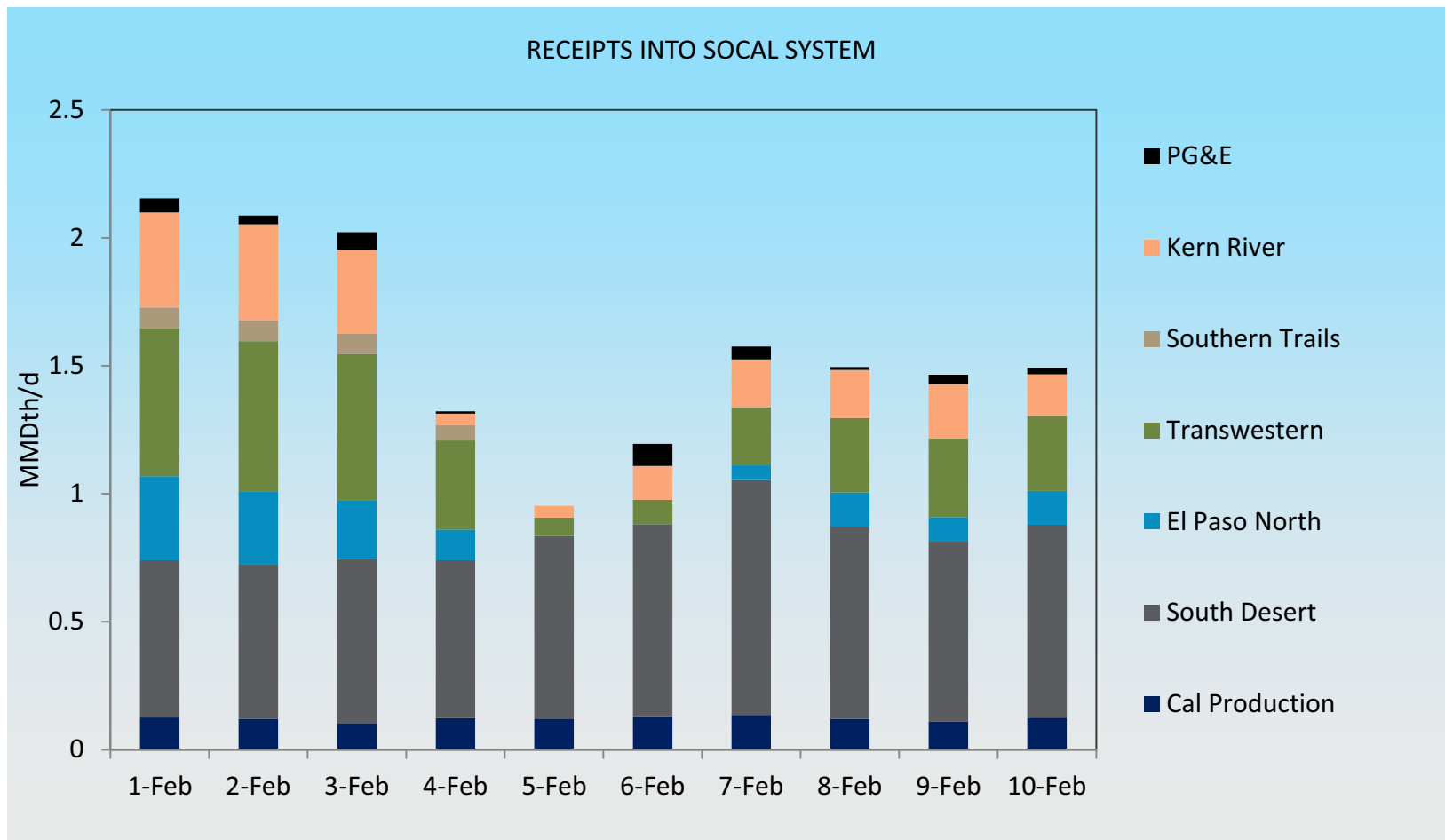


# Feb 6, 2014 Gas Prices



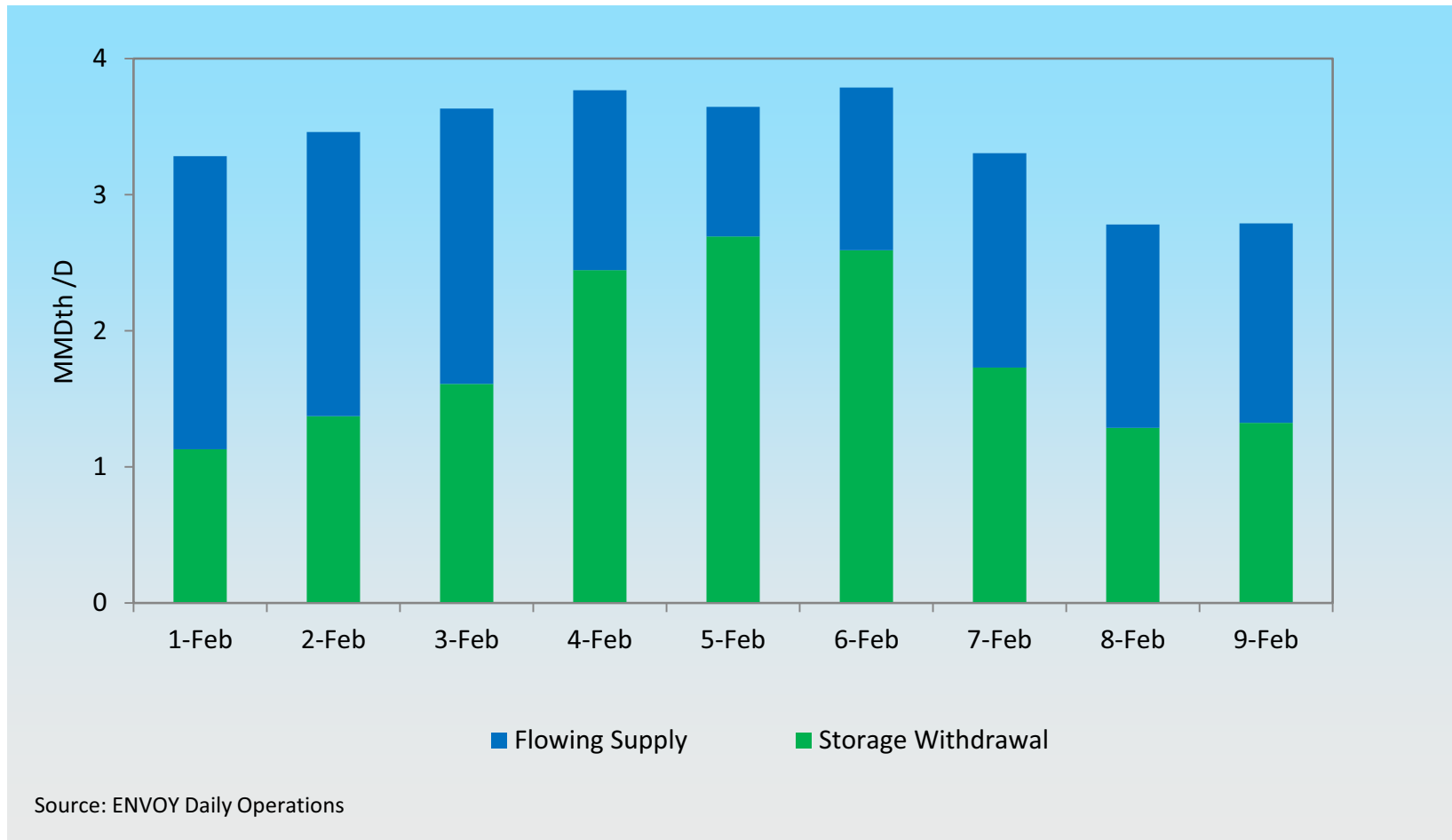
\$/MMBtu

# Receipts decline as prices spike elsewhere - Feb. 2014



Source: Envoy Daily Operations

# Withdrawal Peaked at 73% of Send Out



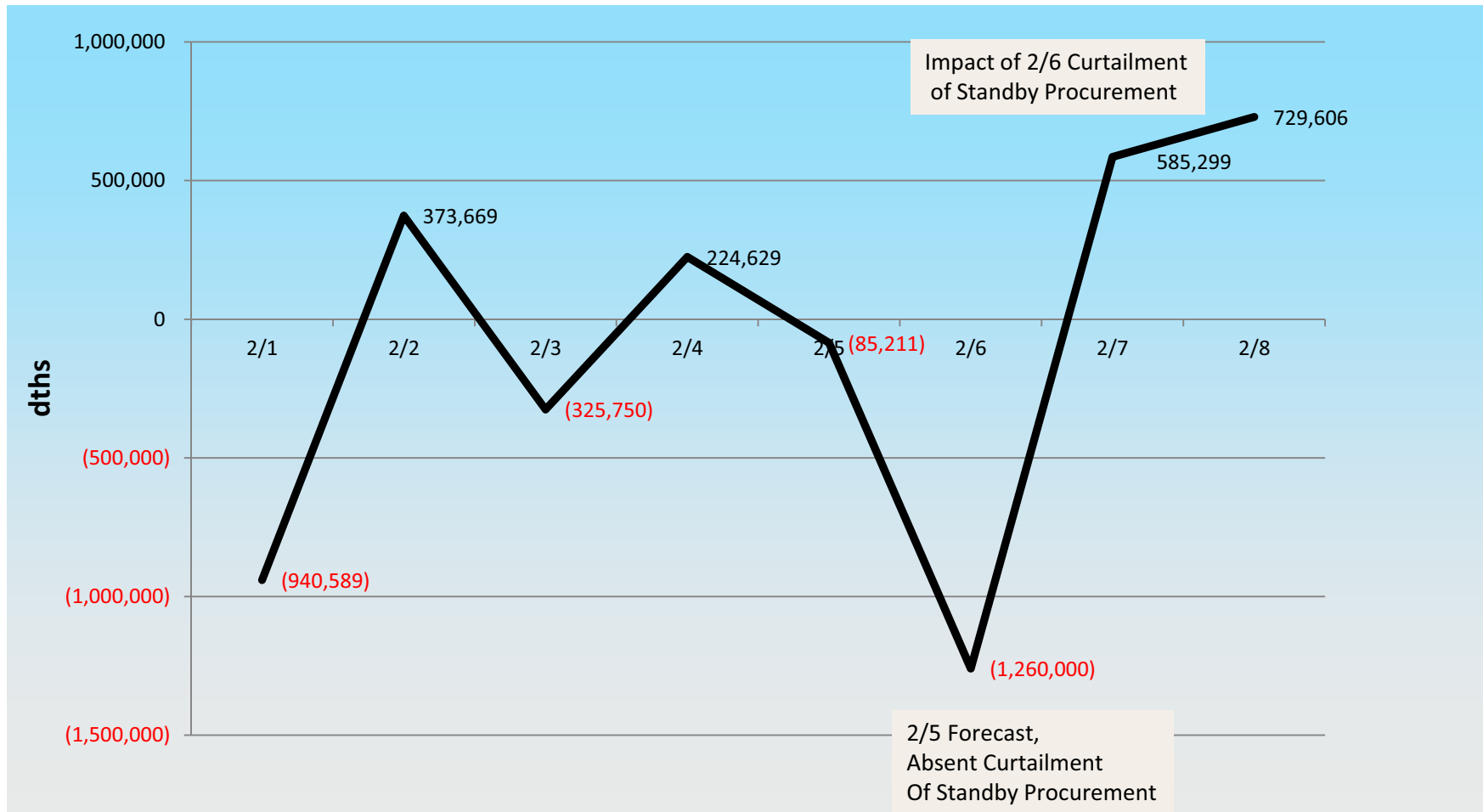
# Need for a Low OFO

- 5-day, 50% balancing no longer conforms to market reality
- Despite winter balancing, curtailment of standby procurement was necessary on Dec. 6-11, 2013 and Feb 6-10, 2014
- Feb 6<sup>th</sup>, 2014 emergency curtailment of electric generators was necessary, and CAISO issued a FlexAlert
- Marketers, suppliers, customers diverted flowing supply to higher-value markets that had abnormally cold weather

# Proposed Solution

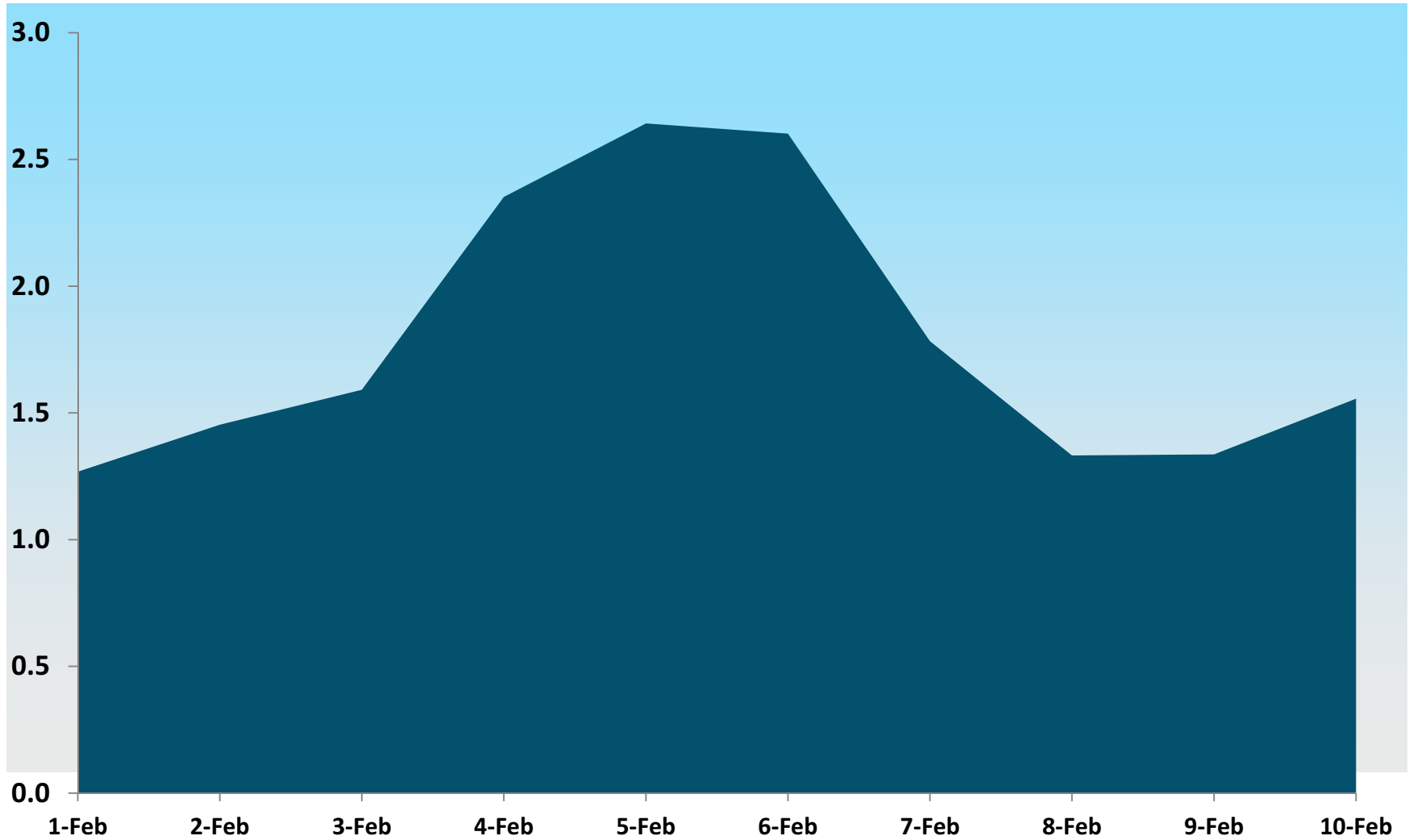
- Replace winter balancing rules (circa 1997) with low OFO procedures similar to those on PG&E system.
  - Low OFOs appeared to adequately deal with supply diversions on PG&E system during last winter period.

# February Storage Withdrawal Used for Balancing



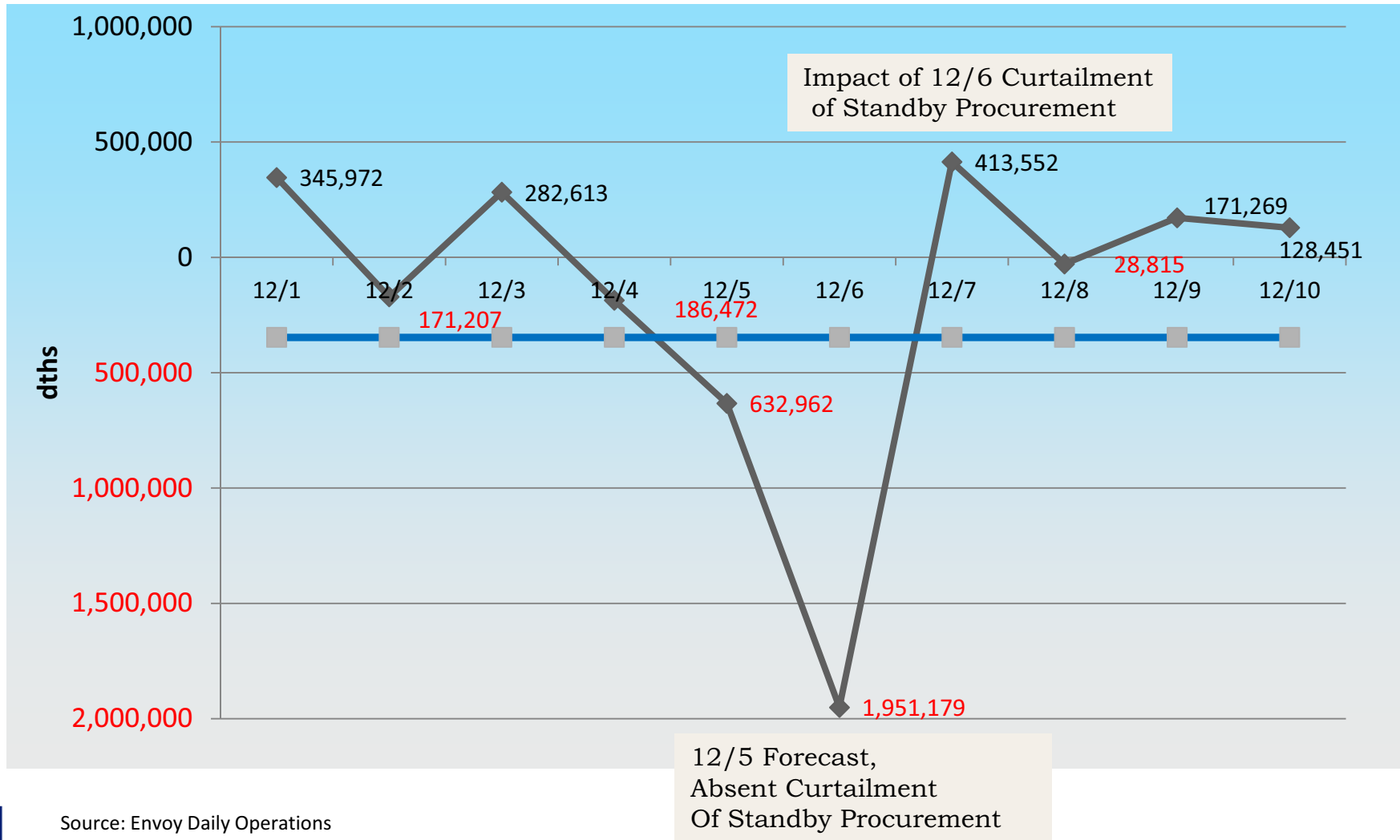
Source: Envoy Daily Operations

# Over-reliance of Storage Withdrawal – February 2014

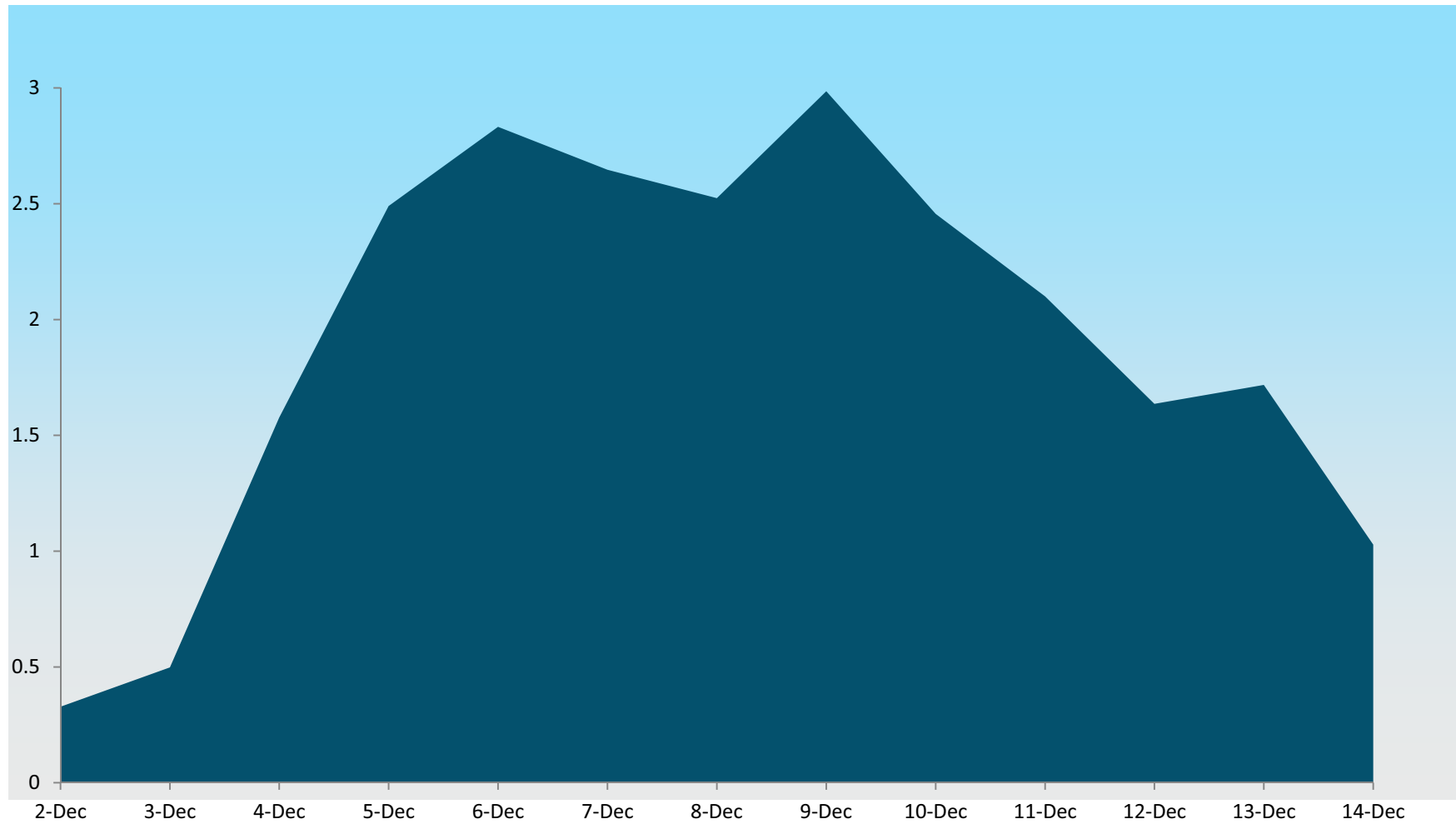




# December Storage Withdrawal Used for Balancing



## Over-reliance on Storage Withdrawal Dec. 2013



# PG&E Low OFO Approach

- PG&E has assets (primarily linepack) allocated to the balancing function and calls low OFOs when those assets are forecast to be depleted the next day
  - Applies throughout the year
  - PG&E chooses stage with noncompliance charges high enough to ensure compliance
- SoCalGas can adopt PG&E's approach by using the storage assets allocated to the balancing function as the trigger calculation
- SoCalGas can use PG&E's Stage tolerances and noncompliance penalty structure

# PG&E Low OFOs

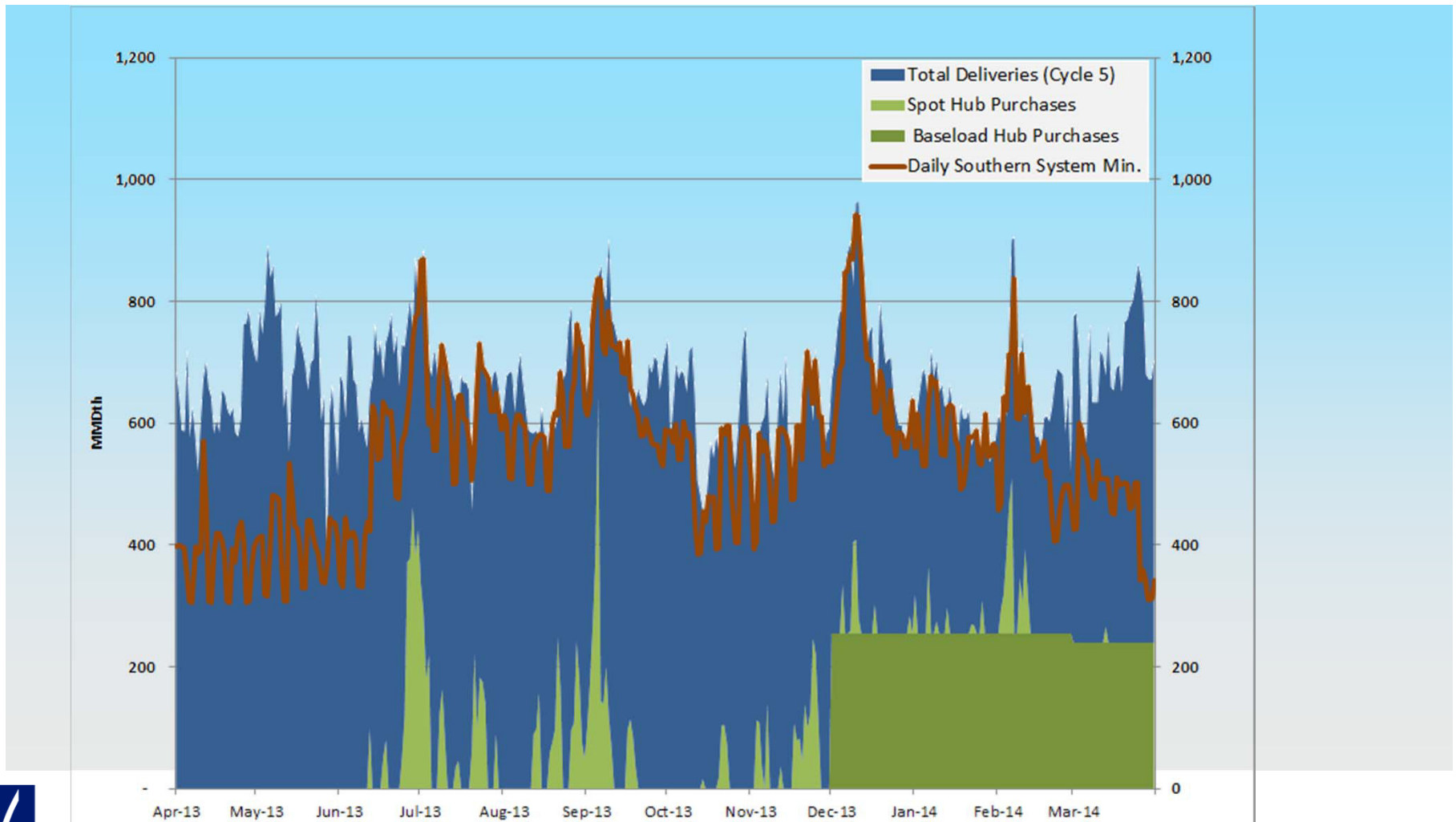
## 2012-March 31, 2014

Stage	Tolerance	Average	Charge	# Events
1	Up to -25%	-6%	\$0.25/Dth	22
2	Up to -20%	-7%	\$1/Dth	6
3	Up to -15%	-5%	\$5/Dth	4
4	Up to -5%	-5%	\$25/Dth	4
5	Up to -5%	n/a	\$25/Dth +city gate	0
EFO	Zero	n/a	\$50/Dth + city gate	0

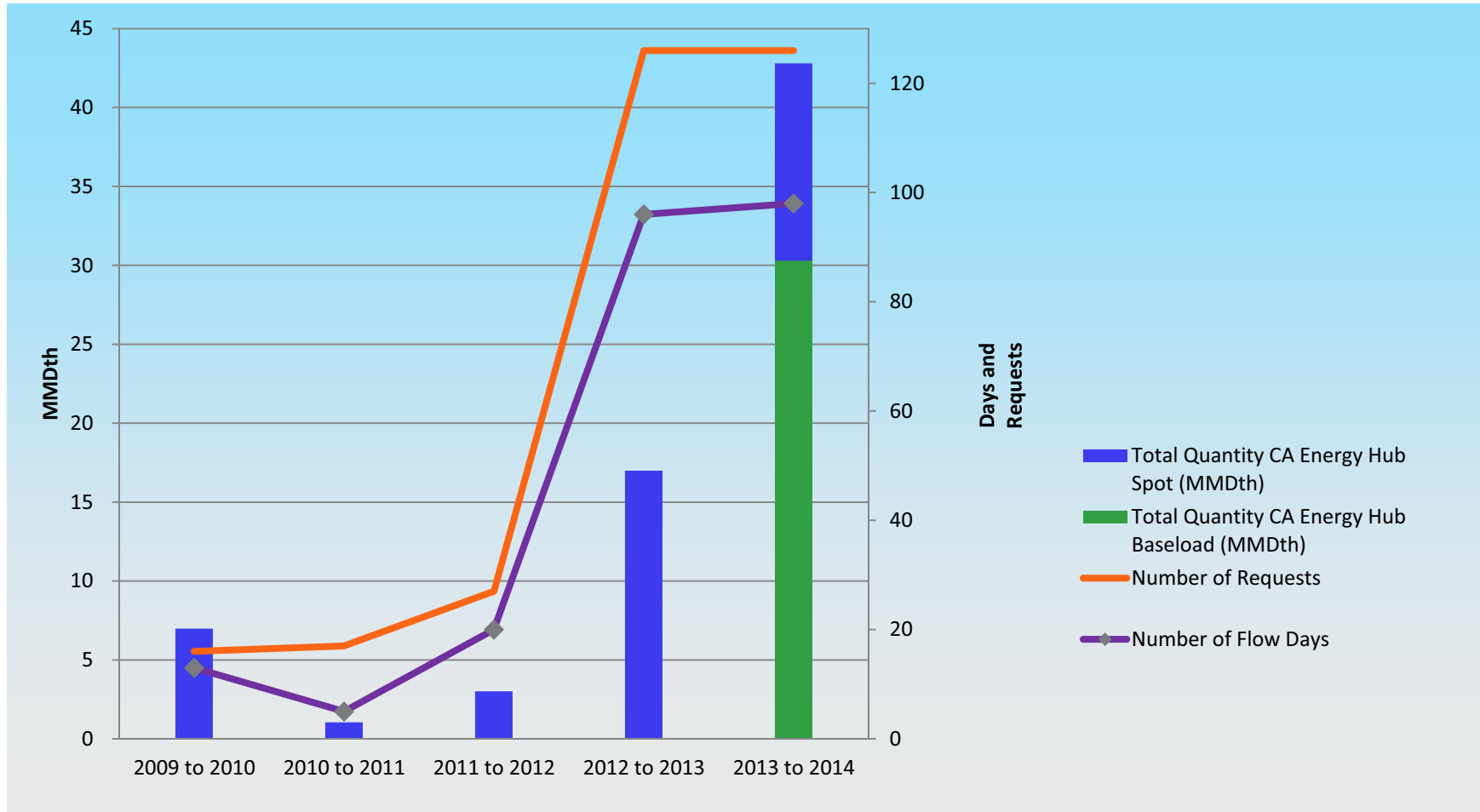
# Proposed SoCalGas Low OFO Trigger

- SoCalGas calls low OFO when it forecasts more than 340 MMcfd (storage withdrawal allocated to balancing function) will be used for balancing the next day
- If (Forecasted Sendout – Forecasted Receipts – Forecasted Withdrawal from Storage Accounts) > 340 MMcfd of withdrawal from balancing, then low OFO
- Equal to “Daily Operations” screen line labelled “Storage Injection for Customer Balancing (Withdrawal)” in Envoy
- SoCalGas will strive to call low OFOs before 8 pm the day before flow

# April 2013 - March 2014 Southern System Deliveries



# Southern System Historical Data

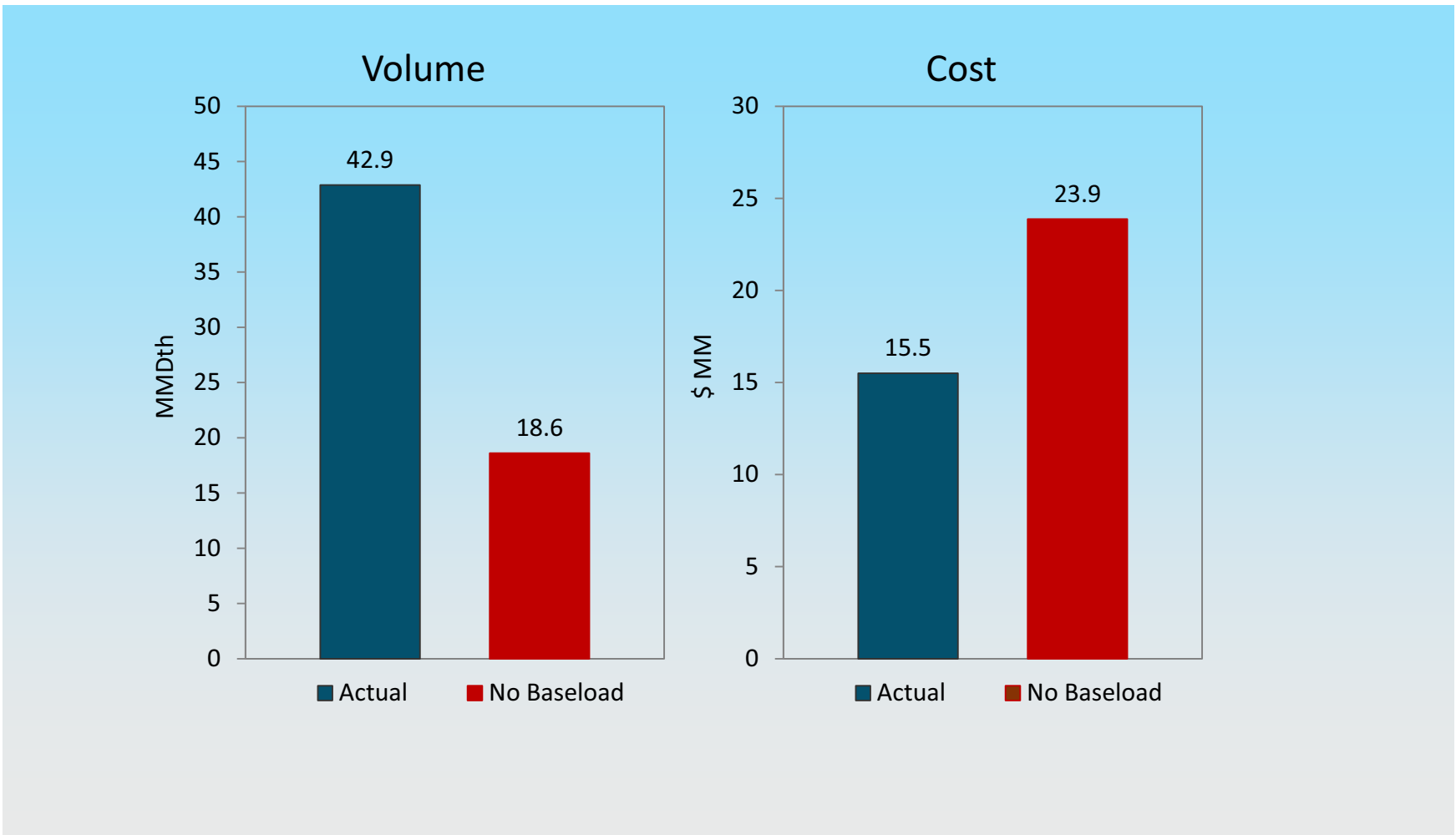


# Southern System Reliability (SSR) Purchases and Interruptible BTS Discounts

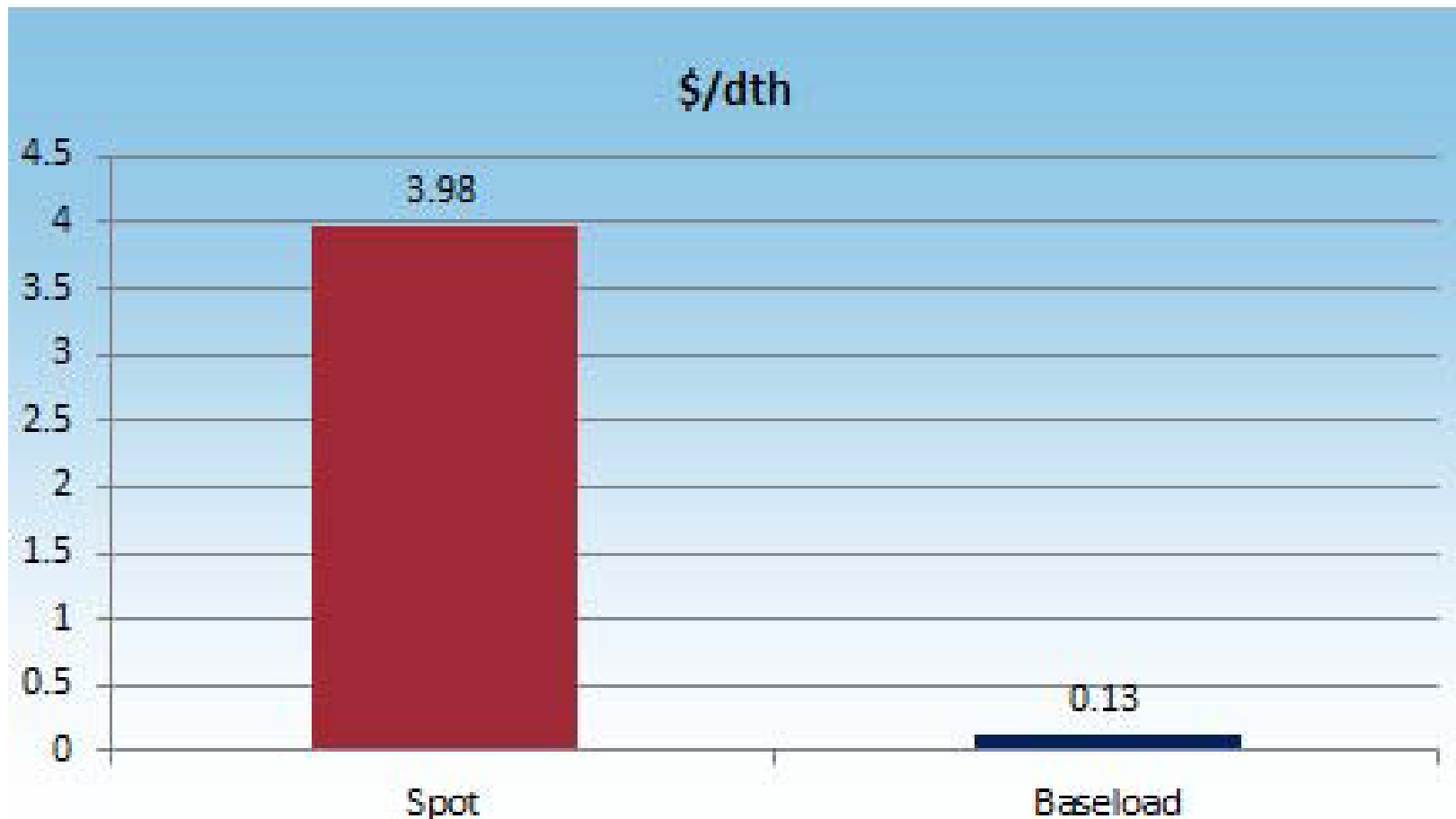
	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
<b>Purchases (Dth)</b>	<b>6,983,793</b>	<b>1,044,677</b>	<b>3,014,544</b>	<b>16,988,817</b>	<b>42,878,668</b>
<b>SRMA Cost (\$MM)</b>	<b>2.2</b>	<b>3.8</b>	<b>1.1</b>	<b>6.3</b>	<b>15.5</b>
<b>Net Cost (\$/Dth)</b>	<b>0.31</b>	<b>3.63</b>	<b>0.36</b>	<b>0.37</b>	<b>0.36</b>
<b>BTS Discounts (\$MM)</b>	<b>0</b>	<b>0</b>	<b>5.5</b>	<b>8.6</b>	<b>7.9</b>
<b>Total \$MM</b>	<b>2.2</b>	<b>3.8</b>	<b>6.6</b>	<b>14.9</b>	<b>23.4</b>



# Baseload increased volumes but decreased cost by over \$8MM



# 2013/2014 Winter Spot vs. Baseload Net Costs



# High Operational Flow Order (High OFO)

- A High OFO is declared when SoCalGas determines that expected receipts will exceed total forecasted system capacity (including storage injection capacity and latest off-system scheduled quantities) for a pending flow day
- SoCalGas uses the on-system scheduled quantities from the latest scheduling cycle to determine expected system receipts for the High OFO calculation

# Scheduled Quantities Used for High OFO

Cycle	Scheduled Quantity Used for OFO Calculation
Timely	<i>Prior Day, Evening Cycle</i>
Evening	<i>Current Day, Timely Cycle</i>
Intraday 1	<i>Current Day, Evening Cycle</i>
Intraday 2	<i>Current Day, Intraday 1 Cycle</i>

On High OFO days, SoCalGas will only confirm nominations up to the total system capacity for Intraday 1 (Cycle 3) and Intraday 2 (Cycle 4)

SoCalGas will not declare a High OFO on Intraday 2 (Cycle 4), but will limit the confirmations to the total system capacity as it does on all other days

# High OFO Review

- 29 High OFO events during Review Period
- Reduction of 40% compared to previous reporting period of 48
- Almost all high OFOs occurred during shoulder months

# High OFO Comparison

## 2013 Forum Report

- Cycle 1 29
  - Cycle 2 6
  - Cycle 3 13
- 

Total 48

## 2014 Forum Report

- Cycle 1 18
  - Cycle 2 5
  - Cycle 3 6
- 

Total 29

# Potential Tool to Address Minimum Flow Requirements

No new tools proposed

# Long Term System Improvement

## North–South Project Revenue Requirement Application (A.13-12-013)

- Filed on December 20, 2013
- Prehearing Conference held on March 13
- Commissioner Florio Scoping Memo issued 5-5-14





# Gas-Electric Coordination

## Daily Gas Control – CAISO Communication

- Done to ensure that CAISO is advised on the availability of system capacity to serve electric generation requirements
- The objective is to minimize outages and curtailments on both the electric grid and the SoCalGas/SDG&E gas systems

## Gas-Electric Coordination (cont.)

### Gas Day/Scheduling Cycle Modifications

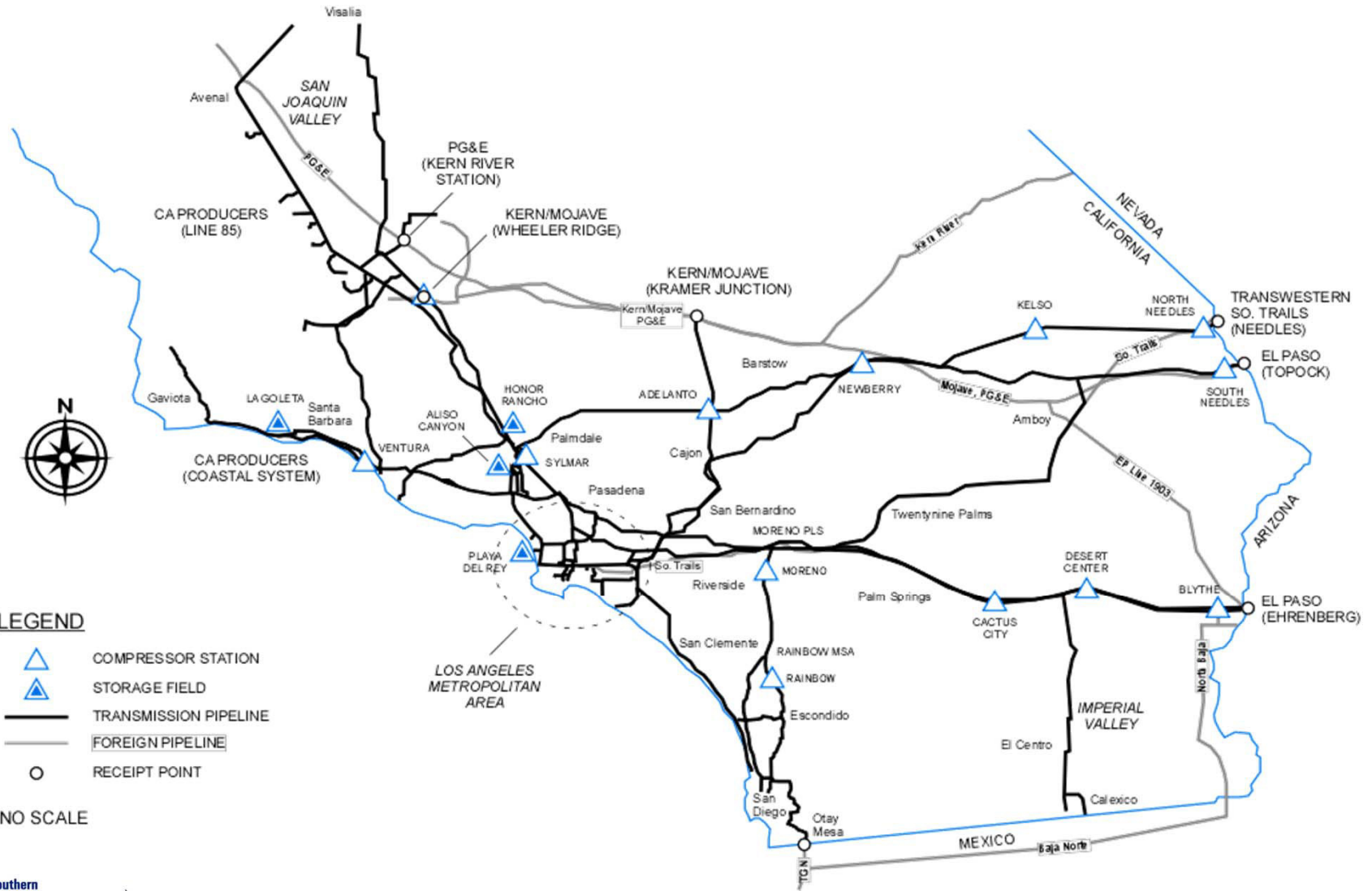
- The FERC is ready to take action to address Gas-Electric Coordination
- A proposed rule orders the interstate pipelines and ISO/RTOs to either accept exemplary changes to the Gas Day and Scheduling cycles or to make a consensus proposal by late June 2014
- Discussions are underway at NAESB to develop a consensus proposal

# Post-Forum Report/Next Steps






- The post-Forum Report will summarize the matters discussed here and will identify action items, tariff changes and procedural modifications that we agree are necessary
  - Will include descriptions of proposals presented by meeting participants
  - Any proposals made that are rejected by SoCalGas will be included in the post-Forum Report
  - A draft post-Forum Report will be issued to the Forum participants for review by May 30 with a revised draft to be issued by June 6
  - If required, Customer Forum meeting participants will be invited to a conference call regarding the revised draft the week of June 16, to seek resolution of any differences
- Post-Forum Report will be filed by July 7, 2014

# Appendix

# SoCalGas

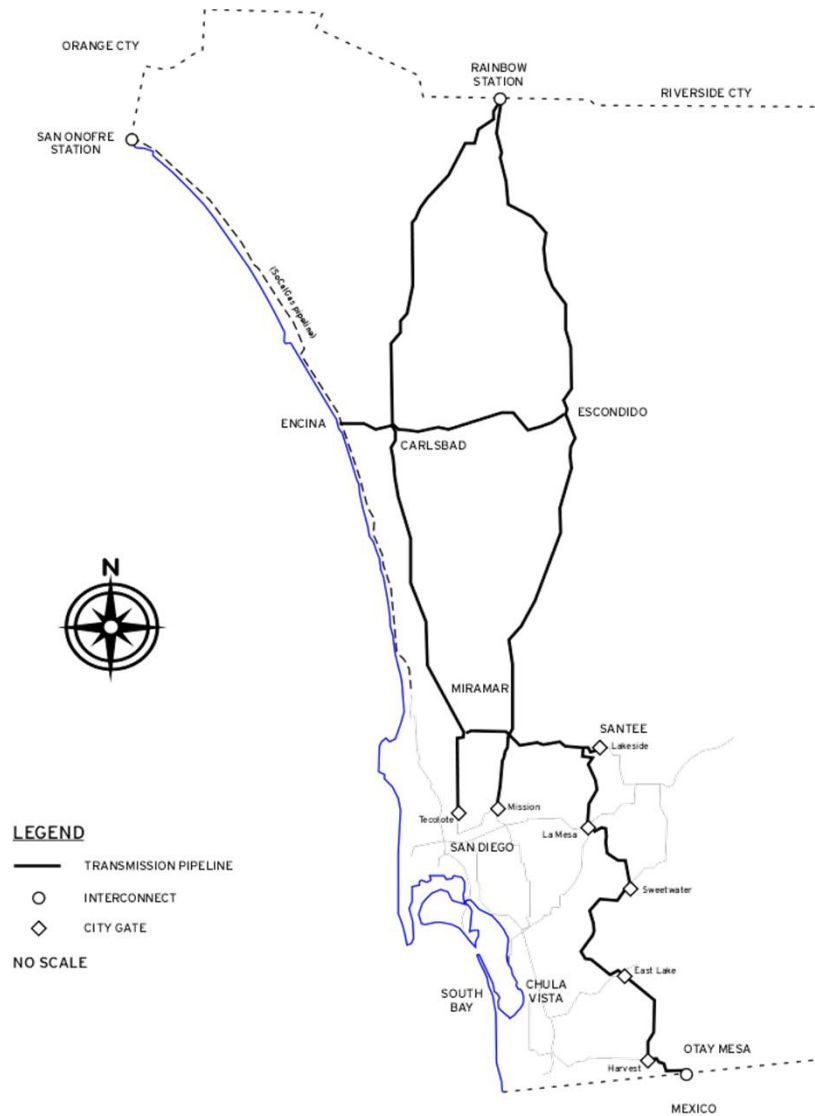


**LEGEND**

-  COMPRESSOR STATION
-  STORAGE FIELD
-  TRANSMISSION PIPELINE
-  FOREIGN PIPELINE
-  RECEIPT POINT

NO SCALE

# SDG&E



# **Attachment B**

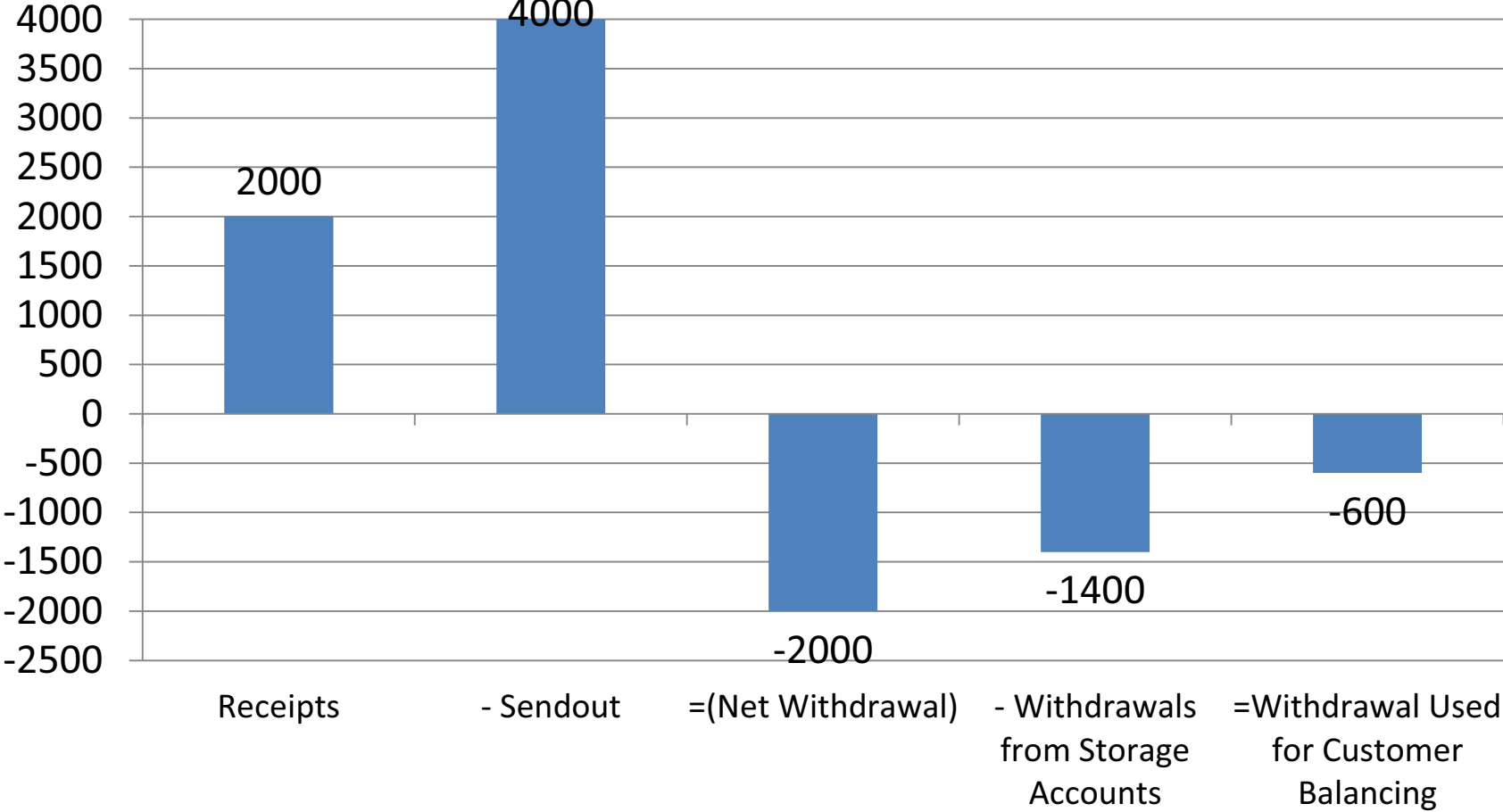
**Search**  
 Estimate Date: 12/05/2013  
 Last updated:

	Actual 12/04/2013	Estimate 12/05/2013	Forecast 12/06/2013	Forecast 12/07/2013	Forecast 12/08/2013
<b>Receipts</b>					
CP - Line 85	50,000	131,141	74,280	74,280	74,280
CP - North Coastal	38,000	44,407	44,708	44,708	44,708
CP - Others	21,000	27,622	28,665	28,665	28,665
El Paso - Ehrenberg	767,000	776,560	816,281	816,281	816,281
El Paso - Topock	60,000	7,874	36,791	36,791	36,791
Elk Hills - Wheeler Ridge	0	0	0	0	0
Kam River/Mojave - Kramer Junction	241,000	128,042	69,051	69,051	69,051
Kam River/Mojave - Wheeler Ridge	386,000	232,544	157,712	157,712	157,712
North Baja - Blythe	58,000	0	15,000	15,000	15,000
PG & E - Wheeler Ridge	65,000	70,557	72,067	72,067	72,067
Southern Trails - North Needles	38,000	21,200	27,900	27,900	27,900
TGN - Otay Mesa	0	0	0	0	0
Transwestern - North Needles	558,000	397,093	261,642	261,642	261,642
Transwestern - Topock	115,000	95,410	30,000	30,000	30,000
<b>Total Receipts</b>	<b>2,398,000</b>	<b>1,932,450</b>	<b>1,634,107</b>	<b>1,634,107</b>	<b>1,634,107</b>
<b>Deliveries</b>					
System Sendout	3,686,000	4,335,000	4,335,000	3,672,000	3,647,000
<b>Total Deliveries</b>	<b>3,686,000</b>	<b>4,335,000</b>	<b>4,335,000</b>	<b>3,672,000</b>	<b>3,647,000</b>
Net Injections/Withdrawals	(1,577,000)	(2,402,550)	(2,700,893)	(2,037,893)	(2,012,893)
Injection Capacity		362,000	362,000	362,000	362,000
Withdrawal Capacity		3,090,000	3,090,000	3,090,000	3,090,000
<b>Ending Storage Balance (MCF)</b>	<b>121,588,000</b>	<b>119,185,450</b>	<b>116,484,557</b>	<b>114,446,664</b>	<b>112,433,771</b>
<b>Balancing</b>					
Total Daily Customer Imbalance	(186,472)	(545,512)	(1,951,179)	(1,388,179)	(1,263,179)
Cumulative Customer Imbalance	(905,223)				
<b>Storage Injection for Customer Balancing (Withdrawal)</b>	<b>(186,472)</b>	<b>(545,512)</b>	<b>(1,951,179)</b>	<b>(1,388,179)</b>	<b>(1,263,179)</b>
Transmission Fuel Use	6,952	5,602	4,737	4,737	4,737

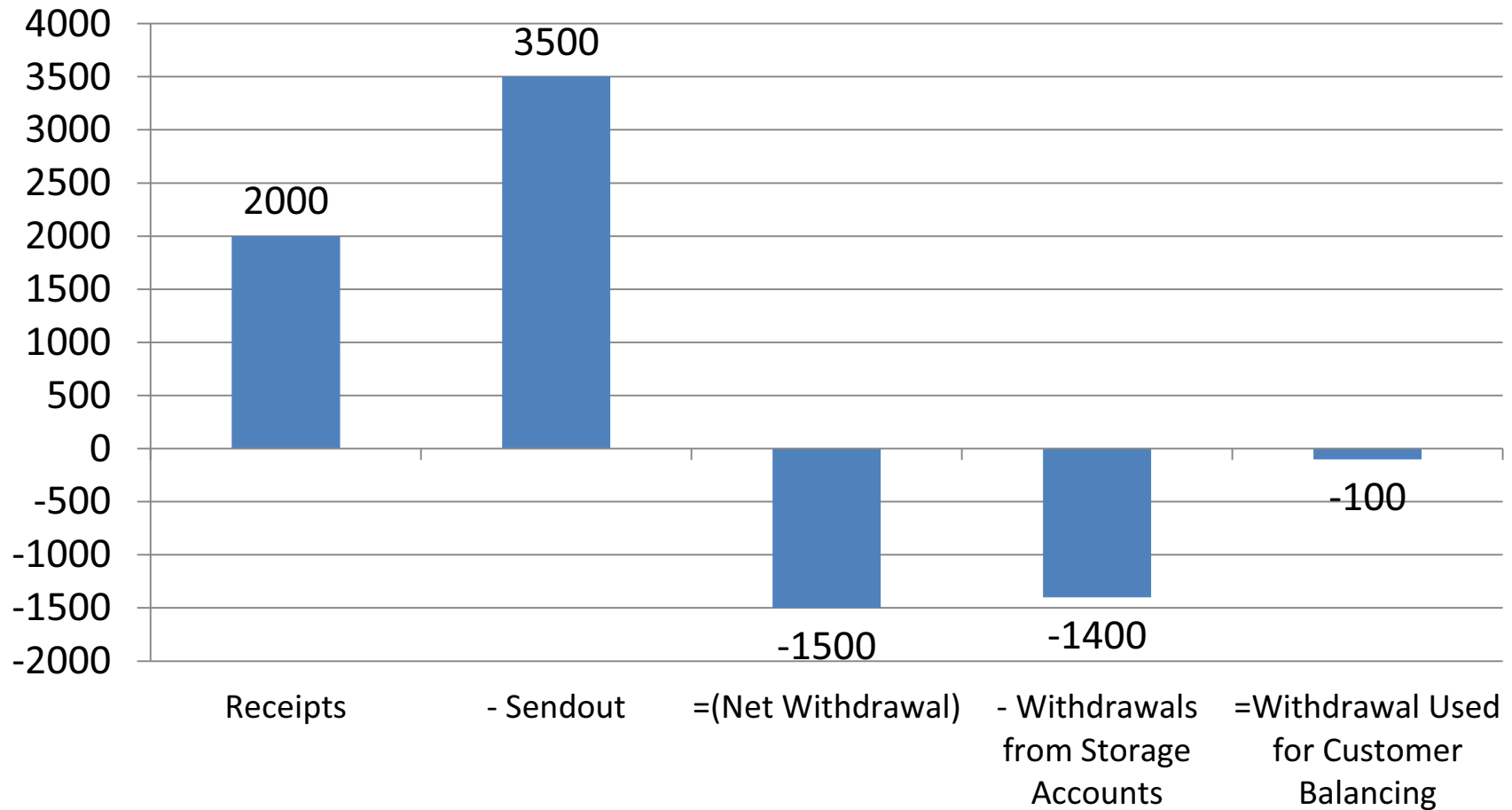


# **Attachment C**

# Example of Daily Posting Indicating Low OFO Potential



## Example of Daily Posting Indicating No Low OFO



# **Attachment D**

**(Mar-13 to Apr-14)**

Low OFO

Gas Flow      Actual

**(515,000)**

4/1/2013	256056
4/2/2013	234907
4/3/2013	-61887
4/4/2013	148269
4/5/2013	240898
4/6/2013	-3248
4/7/2013	58327
4/8/2013	-291017
4/9/2013	-76507
4/10/2013	-82289
4/11/2013	-182766
4/12/2013	270490
4/13/2013	242820
4/14/2013	-6133
4/15/2013	-254002
4/16/2013	-216763
4/17/2013	-326873
4/18/2013	-115171
4/19/2013	-15203
4/20/2013	256713
4/21/2013	180713
4/22/2013	-180992
4/23/2013	-236231
4/24/2013	<b>-394552</b>
4/25/2013	-189373
4/26/2013	36908
4/27/2013	208611
4/28/2013	202854
4/29/2013	-133381
4/30/2013	173412
5/1/2013	-222247
5/2/2013	-58038
5/3/2013	289978
5/4/2013	547980
5/5/2013	501151
5/6/2013	259862
5/7/2013	289771
5/8/2013	350265
5/9/2013	144747
5/10/2013	358651
5/11/2013	-241262
5/12/2013	352397
5/13/2013	-262071
5/14/2013	168563
5/15/2013	484526
5/16/2013	78244

5/17/2013	-201953
5/18/2013	-56770
5/19/2013	413811
5/20/2013	39164
5/21/2013	310249
5/22/2013	84837
5/23/2013	51439
5/24/2013	180770
5/25/2013	-290005
5/26/2013	-478593
5/27/2013	-803
5/28/2013	-642669
5/29/2013	-632252
5/30/2013	-781082
5/31/2013	-649660
6/1/2013	221706
6/2/2013	438354
6/3/2013	251047
6/4/2013	588135
6/5/2013	537622
6/6/2013	310813
6/7/2013	522840
6/8/2013	-199676
6/9/2013	-266048
6/10/2013	310584
6/11/2013	522166
6/12/2013	-415179
6/13/2013	348610
6/14/2013	-95779
6/15/2013	68099
6/16/2013	-229187
6/17/2013	60525
6/18/2013	-68563
6/19/2013	189323
6/20/2013	344320
6/21/2013	281975
6/22/2013	253513
6/23/2013	-51836
6/24/2013	124087
6/25/2013	151151
6/26/2013	-113858
6/27/2013	-218710
6/28/2013	-466178
6/29/2013	-603683
6/30/2013	-571677
7/1/2013	-813217
7/2/2013	-275600

7/3/2013	399852
7/4/2013	315078
7/5/2013	456522
7/6/2013	562604
7/7/2013	409460
7/8/2013	-270330
7/9/2013	-494819
7/10/2013	26605
7/11/2013	23336
7/12/2013	317070
7/13/2013	317381
7/14/2013	324381
7/15/2013	-122846
7/16/2013	-31642
7/17/2013	-120706
7/18/2013	-192851
7/19/2013	36960
7/20/2013	-67774
7/21/2013	-194452
7/22/2013	-434943
7/23/2013	-63770
7/24/2013	-337499
7/25/2013	-9223
7/26/2013	83399
7/27/2013	421721
7/28/2013	468811
7/29/2013	495477
7/30/2013	164266
7/31/2013	185889
8/1/2013	315166
8/2/2013	292510
8/3/2013	340017
8/4/2013	406592
8/5/2013	124623
8/6/2013	154296
8/7/2013	369763
8/8/2013	51027
8/9/2013	60260
8/10/2013	324179
8/11/2013	272980
8/12/2013	-141390
8/13/2013	-30007
8/14/2013	37997
8/15/2013	-266771
8/16/2013	-83823
8/17/2013	143541
8/18/2013	-135951

8/19/2013	-488800
8/20/2013	-238593
8/21/2013	-406372
8/22/2013	-469248
8/23/2013	27285
8/24/2013	304561
8/25/2013	115369
8/26/2013	-232311
8/27/2013	-497954
8/28/2013	-699905
8/29/2013	-655266
8/30/2013	-736898
8/31/2013	-134583
9/1/2013	43213
9/2/2013	-145546
9/3/2013	-783421
9/4/2013	-856531
9/5/2013	-373186
9/6/2013	-81383
9/7/2013	52286
9/8/2013	237715
9/9/2013	29224
9/10/2013	525885
9/11/2013	-58693
9/12/2013	143762
9/13/2013	56239
9/14/2013	187846
9/15/2013	87553
9/16/2013	-106998
9/17/2013	-53296
9/18/2013	-140721
9/19/2013	-53428
9/20/2013	343432
9/21/2013	331379
9/22/2013	372511
9/23/2013	32604
9/24/2013	266222
9/25/2013	286368
9/26/2013	188329
9/27/2013	326152
9/28/2013	313995
9/29/2013	444010
9/30/2013	178477
10/1/2013	186142
10/2/2013	25950
10/3/2013	-11004
10/4/2013	227215



10/5/2013	465564
10/6/2013	457166
10/7/2013	-289942
10/8/2013	110441
10/9/2013	-89974
10/10/2013	-30100
10/11/2013	-482
10/12/2013	5494
10/13/2013	26290
10/14/2013	-501057
10/15/2013	-557360
10/16/2013	-647908
10/17/2013	-153705
10/18/2013	-81765
10/19/2013	-199802
10/20/2013	-181950
10/21/2013	-375914
10/22/2013	-403514
10/23/2013	-288503
10/24/2013	-13473
10/25/2013	-156309
10/26/2013	63557
10/27/2013	-275650
10/28/2013	-599458
10/29/2013	-186381
10/30/2013	-211328
10/31/2013	-190207
11/1/2013	129505
11/2/2013	-11765
11/3/2013	72557
11/4/2013	-182735
11/5/2013	-68758
11/6/2013	-138902
11/7/2013	255928
11/8/2013	99867
11/9/2013	17918
11/10/2013	-40470
11/11/2013	-183350
11/12/2013	94862
11/13/2013	343687
11/14/2013	97514
11/15/2013	221025
11/16/2013	245653
11/17/2013	-23822
11/18/2013	632196
11/19/2013	368876
11/20/2013	121444

11/21/2013	-385487
11/22/2013	-788588
11/23/2013	-397594
11/24/2013	-491420
11/25/2013	-987045
11/26/2013	803830
11/27/2013	496498
11/28/2013	266639
11/29/2013	-143897
11/30/2013	151770
12/1/2013	345942
12/2/2013	-171207
12/3/2013	282613
12/4/2013	-186472
12/5/2013	-632962
12/6/2013	-196811
12/7/2013	312325
12/8/2013	413552
12/9/2013	-28815
12/10/2013	171269
12/11/2013	128417
12/12/2013	518276
12/13/2013	134913
12/14/2013	322224
12/15/2013	854278
12/16/2013	406000
12/17/2013	-79005
12/18/2013	-584224
12/19/2013	530887
12/20/2013	172119
12/21/2013	43773
12/22/2013	-110502
12/23/2013	20498
12/24/2013	245454
12/25/2013	508019
12/26/2013	32501
12/27/2013	-32873
12/28/2013	345954
12/29/2013	115955
12/30/2013	-330657
12/31/2013	295098
1/1/2014	-98104
1/2/2014	-227168
1/3/2014	-118225
1/4/2014	-328952
1/5/2014	-527687
1/6/2014	-1046448



= Standby Procurement Days  
 Withdrawals by balancing  
 Customers tended to cease

1/7/2014	-1161748
1/8/2014	331631
1/9/2014	-180435
1/10/2014	172304
1/11/2014	174824
1/12/2014	999324
1/13/2014	-84676
1/14/2014	-69734
1/15/2014	-142735
1/16/2014	-209830
1/17/2014	-271517
1/18/2014	213794
1/19/2014	69791
1/20/2014	-184211
1/21/2014	-303546
1/22/2014	-239439
1/23/2014	-607450
1/24/2014	844381
1/25/2014	170308
1/26/2014	673233
1/27/2014	74966
1/28/2014	245414
1/29/2014	-129817
1/30/2014	116473
1/31/2014	650810
2/1/2014	-940589
2/2/2014	373669
2/3/2014	-325750
2/4/2014	224629
2/5/2014	-85211
2/6/2014	385579
2/7/2014	585299
2/8/2014	729606
2/9/2014	438225
2/10/2014	280776
2/11/2014	-100830
2/12/2014	-121430
2/13/2014	-241972
2/14/2014	-102008
2/15/2014	-174830
2/16/2014	107872
2/17/2014	33664
2/18/2014	62265
2/19/2014	77975
2/20/2014	-272694
2/21/2014	-27335
2/22/2014	-158184

2/23/2014	-136516
2/24/2014	-232829
2/25/2014	148907
2/26/2014	206450
2/27/2014	306341
2/28/2014	199082
3/1/2014	159795
3/2/2014	103084
3/3/2014	52541
3/4/2014	-33039
3/5/2014	-174150
3/6/2014	174101
3/7/2014	271634
3/8/2014	25710
3/9/2014	319025
3/10/2014	235883
3/11/2014	131230
3/12/2014	-80312
3/13/2014	14139
3/14/2014	129028
3/15/2014	-132761
3/16/2014	230278
3/17/2014	210049
3/18/2014	76805
3/19/2014	95813
3/20/2014	-17142
3/21/2014	-227825
3/22/2014	162591
3/23/2014	-8658
3/24/2014	-235207
3/25/2014	146378
3/26/2014	80928
3/27/2014	26802
3/28/2014	-43241
3/29/2014	46139
3/30/2014	265046
3/31/2014	61809

Count 24

**(Mar-13 to Apr-14)**

**Low OFO**

<b>Gas Flow date</b>	<b>Actual Storage Wdr for Cust Balancing</b>	<b>(350,200)</b>
4/1/2013	256056	
4/2/2013	234907	
4/3/2013	-61887	
4/4/2013	148269	
4/5/2013	240898	
4/6/2013	-3248	
4/7/2013	58327	
4/8/2013	-291017	
4/9/2013	-76507	
4/10/2013	-82289	
4/11/2013	-182766	
4/12/2013	270490	
4/13/2013	242820	
4/14/2013	-6133	
4/15/2013	-254002	
4/16/2013	-216763	
4/17/2013	-326873	
4/18/2013	-115171	
4/19/2013	-15203	
4/20/2013	256713	
4/21/2013	180713	
4/22/2013	-180992	
4/23/2013	-236231	
4/24/2013	<b>-394552</b>	
4/25/2013	-189373	
4/26/2013	36908	
4/27/2013	208611	
4/28/2013	202854	
4/29/2013	-133381	
4/30/2013	173412	
5/1/2013	-222247	
5/2/2013	-58038	
5/3/2013	289978	
5/4/2013	547980	
5/5/2013	501151	
5/6/2013	259862	
5/7/2013	289771	
5/8/2013	350265	
5/9/2013	144747	
5/10/2013	358651	
5/11/2013	-241262	
5/12/2013	352397	
5/13/2013	-262071	

5/14/2013	168563
5/15/2013	484526
5/16/2013	78244
5/17/2013	-201953
5/18/2013	-56770
5/19/2013	413811
5/20/2013	39164
5/21/2013	310249
5/22/2013	84837
5/23/2013	51439
5/24/2013	180770
5/25/2013	-290005
5/26/2013	-478593
5/27/2013	-803
5/28/2013	-642669
5/29/2013	-632252
5/30/2013	-781082
5/31/2013	-649660
6/1/2013	221706
6/2/2013	438354
6/3/2013	251047
6/4/2013	588135
6/5/2013	537622
6/6/2013	310813
6/7/2013	522840
6/8/2013	-199676
6/9/2013	-266048
6/10/2013	310584
6/11/2013	522166
6/12/2013	-415179
6/13/2013	348610
6/14/2013	-95779
6/15/2013	68099
6/16/2013	-229187
6/17/2013	60525
6/18/2013	-68563
6/19/2013	189323
6/20/2013	344320
6/21/2013	281975
6/22/2013	253513
6/23/2013	-51836
6/24/2013	124087
6/25/2013	151151
6/26/2013	-113858
6/27/2013	-218710
6/28/2013	-466178
6/29/2013	-603683


6/30/2013	-571677
7/1/2013	-813217
7/2/2013	-275600
7/3/2013	399852
7/4/2013	315078
7/5/2013	456522
7/6/2013	562604
7/7/2013	409460
7/8/2013	-270330
7/9/2013	-494819
7/10/2013	26605
7/11/2013	23336
7/12/2013	317070
7/13/2013	317381
7/14/2013	324381
7/15/2013	-122846
7/16/2013	-31642
7/17/2013	-120706
7/18/2013	-192851
7/19/2013	36960
7/20/2013	-67774
7/21/2013	-194452
7/22/2013	-434943
7/23/2013	-63770
7/24/2013	-337499
7/25/2013	-9223
7/26/2013	83399
7/27/2013	421721
7/28/2013	468811
7/29/2013	495477
7/30/2013	164266
7/31/2013	185889
8/1/2013	315166
8/2/2013	292510
8/3/2013	340017
8/4/2013	406592
8/5/2013	124623
8/6/2013	154296
8/7/2013	369763
8/8/2013	51027
8/9/2013	60260
8/10/2013	324179
8/11/2013	272980
8/12/2013	-141390
8/13/2013	-30007
8/14/2013	37997
8/15/2013	-266771

8/16/2013	-83823
8/17/2013	143541
8/18/2013	-135951
8/19/2013	-488800
8/20/2013	-238593
8/21/2013	-406372
8/22/2013	-469248
8/23/2013	27285
8/24/2013	304561
8/25/2013	115369
8/26/2013	-232311
8/27/2013	-497954
8/28/2013	-699905
8/29/2013	-655266
8/30/2013	-736898
8/31/2013	-134583
9/1/2013	43213
9/2/2013	-145546
9/3/2013	-783421
9/4/2013	-856531
9/5/2013	-373186
9/6/2013	-81383
9/7/2013	52286
9/8/2013	237715
9/9/2013	29224
9/10/2013	525885
9/11/2013	-58693
9/12/2013	143762
9/13/2013	56239
9/14/2013	187846
9/15/2013	87553
9/16/2013	-106998
9/17/2013	-53296
9/18/2013	-140721
9/19/2013	-53428
9/20/2013	343432
9/21/2013	331379
9/22/2013	372511
9/23/2013	32604
9/24/2013	266222
9/25/2013	286368
9/26/2013	188329
9/27/2013	326152
9/28/2013	313995
9/29/2013	444010
9/30/2013	178477
10/1/2013	186142



10/2/2013	25950
10/3/2013	-11004
10/4/2013	227215
10/5/2013	465564
10/6/2013	457166
10/7/2013	-289942
10/8/2013	110441
10/9/2013	-89974
10/10/2013	-30100
10/11/2013	-482
10/12/2013	5494
10/13/2013	26290
10/14/2013	-501057
10/15/2013	-557360
10/16/2013	-647908
10/17/2013	-153705
10/18/2013	-81765
10/19/2013	-199802
10/20/2013	-181950
10/21/2013	-375914
10/22/2013	-403514
10/23/2013	-288503
10/24/2013	-13473
10/25/2013	-156309
10/26/2013	63557
10/27/2013	-275650
10/28/2013	-599458
10/29/2013	-186381
10/30/2013	-211328
10/31/2013	-190207
11/1/2013	129505
11/2/2013	-11765
11/3/2013	72557
11/4/2013	-182735
11/5/2013	-68758
11/6/2013	-138902
11/7/2013	255928
11/8/2013	99867
11/9/2013	17918
11/10/2013	-40470
11/11/2013	-183350
11/12/2013	94862
11/13/2013	343687
11/14/2013	97514
11/15/2013	221025
11/16/2013	245653
11/17/2013	-23822

11/18/2013	632196
11/19/2013	368876
11/20/2013	121444
11/21/2013	-385487
11/22/2013	-788588
11/23/2013	-397594
11/24/2013	-491420
11/25/2013	-987045
11/26/2013	803830
11/27/2013	496498
11/28/2013	266639
11/29/2013	-143897
11/30/2013	151770
12/1/2013	345942
12/2/2013	-171207
12/3/2013	282613
12/4/2013	-186472
12/5/2013	-632962
12/6/2013	-196811
12/7/2013	312325
12/8/2013	413552
12/9/2013	-28815
12/10/2013	171269
12/11/2013	128417
12/12/2013	518276
12/13/2013	134913
12/14/2013	322224
12/15/2013	854278
12/16/2013	406000
12/17/2013	-79005
12/18/2013	-584224
12/19/2013	530887
12/20/2013	172119
12/21/2013	43773
12/22/2013	-110502
12/23/2013	20498
12/24/2013	245454
12/25/2013	508019
12/26/2013	32501
12/27/2013	-32873
12/28/2013	345954
12/29/2013	115955
12/30/2013	-330657
12/31/2013	295098
1/1/2014	-98104
1/2/2014	-227168
1/3/2014	-118225

 = Standby Procurement Days  
 Withdrawals by balancing  
 Customers tended to cease

1/4/2014	-328952
1/5/2014	-527687
1/6/2014	-1046448
1/7/2014	-1161748
1/8/2014	331631
1/9/2014	-180435
1/10/2014	172304
1/11/2014	174824
1/12/2014	999324
1/13/2014	-84676
1/14/2014	-69734
1/15/2014	-142735
1/16/2014	-209830
1/17/2014	-271517
1/18/2014	213794
1/19/2014	69791
1/20/2014	-184211
1/21/2014	-303546
1/22/2014	-239439
1/23/2014	-607450
1/24/2014	844381
1/25/2014	170308
1/26/2014	673233
1/27/2014	74966
1/28/2014	245414
1/29/2014	-129817
1/30/2014	116473
1/31/2014	650810
2/1/2014	-940589
2/2/2014	373669
2/3/2014	-325750
2/4/2014	224629
2/5/2014	-85211
2/6/2014	385579
2/7/2014	585299
2/8/2014	729606
2/9/2014	438225
2/10/2014	280776
2/11/2014	-100830
2/12/2014	-121430
2/13/2014	-241972
2/14/2014	-102008
2/15/2014	-174830
2/16/2014	107872
2/17/2014	33664
2/18/2014	62265
2/19/2014	77975

2/20/2014	-272694
2/21/2014	-27335
2/22/2014	-158184
2/23/2014	-136516
2/24/2014	-232829
2/25/2014	148907
2/26/2014	206450
2/27/2014	306341
2/28/2014	199082
3/1/2014	159795
3/2/2014	103084
3/3/2014	52541
3/4/2014	-33039
3/5/2014	-174150
3/6/2014	174101
3/7/2014	271634
3/8/2014	25710
3/9/2014	319025
3/10/2014	235883
3/11/2014	131230
3/12/2014	-80312
3/13/2014	14139
3/14/2014	129028
3/15/2014	-132761
3/16/2014	230278
3/17/2014	210049
3/18/2014	76805
3/19/2014	95813
3/20/2014	-17142
3/21/2014	-227825
3/22/2014	162591
3/23/2014	-8658
3/24/2014	-235207
3/25/2014	146378
3/26/2014	80928
3/27/2014	26802
3/28/2014	-43241
3/29/2014	46139
3/30/2014	265046
3/31/2014	61809

Count 41