

**SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)
(1st SET OF DATA REQUESTS FROM SHELL ENERGY)**

QUESTION 1:

Please provide a markup of current SoCalGas' Rule 33 to indicate what you propose would change under FERC storage posting requirements?

RESPONSE 1:

E. OPERATIONAL AND INFORMATION POSTINGS

1. Operational Postings {No Changes}

- Transmission Zone and Receipt Point Capacities on a cycle-by-cycle basis;
- Storage capacities (injection and withdrawal) on a cycle-by-cycle basis;
- Derivation of system capacities;
- Estimated daily (and hourly if available) pipeline operational and scheduling information, e.g., system sendout, off-system deliveries and scheduled quantities at all receipt points*;
- Actual daily (and hourly if available) pipeline operational and scheduling information, e.g., system sendout, off-system deliveries and scheduled quantities at all receipt points;
- Estimated daily storage operational and scheduling information, e.g., injection capacity and scheduled injections, withdrawal capacity and scheduled withdrawals*;
- Actual daily storage operational and scheduling information, e.g., injection capacity and scheduled injections, withdrawal capacity and scheduled withdrawals;
- Daily total physical storage inventory levels**;
- Weekly physical core storage inventory levels;
- Daily operational information depicted in graphical form to show storage inventory levels;
- Status of system balancing rules (daily, winter, monthly);
- OFO status*;
- Composite weighted average temperature*;
- Transmission fuel use*;
- Storage injections and withdrawals for customer balancing*;
- Total daily customer imbalance*; and
- Unsubscribed unbundled firm storage injection and withdrawal capacity*.

* This information posted on the current day and next three-day forecast basis with the forecasted information being updated for each nomination cycle.

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2. G-PAL Postings {Changes per FERC}

- ~~• Weekly net G-PAL position, weekly G-PAL volumes loaned, and weekly G-PAL volumes parked by its Operations Hub.~~
- ~~• Withdrawal schedules for all G-PAL volumes parked and repayment schedules for all G-PAL volumes loaned.~~
- Any Operations Park and Loan Services transactions with Sempra affiliates or the Utility Gas Procurement Department, if discounted below the maximum tariff rate, will be posted consistent with the Utility's rules governing the posting of discounted transportation services for affiliates but no later than the next business day on the Utility's Electronic Bulletin Board (EBB).
- All G-PAL transactions showing identity of each customer, contract number, rate charged, maximum rate applicable, interruptible capacity, special terms and conditions, and affiliate relationship if any. Postings will be made before the first nomination under the transaction and be accessible for 90 days from the date of posting.

3. Contractual Maintenance and Regulatory Postings {No Changes}

- An index of firm rights holders for backbone transportation and storage contracts;
- Planned and actual service pipeline and storage outages through its Maintenance Schedules;
- Terms and conditions regarding secondary market transactions;
- Customers posted information for the marketplace;
- Tariffs and other regulatory filing information; and
- Affiliate transaction information.

4. Rule 41 Postings (Not required by FERC, but part of 2009 BCAP Settlement)

- All requests for supplies by the Gas Control Department to the Operational Hub shall be posted on the Utility's EBB no later than 72 hours after the minimum flow event in order to avoid an increase in the cost of such services that may result from posting this information contemporaneously.
- In the case of the Operational Hub communicating with the Utility Gas Procurement Department as provider of last resort to maintain the Southern System flow requirement, the Utility will post the terms of any resulting transaction within 72 hours after the conclusion of the transaction. The Utility will post the following information about any such transaction: price, volume, date, delivery/receipt points and any special terms.
- Beginning in 2010, the Utility shall post an annual report (Report) of system reliability issues on its website at least two weeks prior to each annual Utility Customer Forum.

5. G-TBS Postings {Changes per FERC}

- The Utility will post all G-TBS storage transactions on its EBB ~~before the deadline for the first nomination under the transaction within one business day of execution~~, including the counterparty name, quantity of storage services contracted on an unbundled basis, contract prices, and contract term. ~~Postings will be accessible for 90 days from the date of posting.~~
- The Utility shall post on its EBB ~~daily as soon as practicable prior to each nomination cycle~~ the injection and withdrawal capacity of its storage system. The Utility shall post on its EBB the aggregate scheduled injection and withdrawal amounts for the completed gas flow day.

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6. G-SMT Postings {Changes per FERC}

- ~~• The Utility will file quarterly reports to the Commission stating the storage capacity rights held by Customers. Such reports will provide the name of the entity holding firm storage rights, the volume held, usage of the rights, and the terms of those rights, including pricing. Such information, excluding usage, will also be posted on the Utility's EBB and will be updated daily;~~
- The Utility will post on its EBB all contracted firm storage capacity and the available unsubscribed storage capacity for sale. This information will be updated on a daily basis.
- The Utility will post on its EBB a summary of the completed secondary market transactions, listing releasing party, acquiring party, amount of capacity, transaction price, and term of the release. Information regarding secondary market transactions will be posted **before** the **deadline** for the first nomination under the transaction ~~next business day~~ and will be accessible for 90 days from the date of posting.
- Market participants can voluntarily post secondary market transaction offers on the Utility's EBB.