

**SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)
(DATA REQUEST DRA-PZS-8)**

QUESTION PZS8-1:

On pages 3 through 4 of the above exhibit reference, SDG&E/SoCalGas propose four tariff provisions to address the impact of receipt point capacity reductions on the sale of firm Backbone Transportation Service (BTS) during the BTS open season.

SDG&E/SoCalGas state that these proposals are consistent with the limitation adopted in D.11-04-032.

- (a) Please state whether these four proposed tariff provisions have previously been presented to customers in the SDG&E/SoCalGas Customer Forums or in any other forum, and if so, state whether any concerns were expressed by customers and explain those concerns fully. On the other hand, if customers are in full support of these four provisions, please so state.
- (b) Please explain in what terms the four proposals presented would be consistent with the limitations adopted in D.11-04-032 and how they would be beneficial to customers.
- (c) Please explain in what terms the four proposals would go further beyond the limitations adopted in D.11-04-032 and how they would be beneficial to customers.

RESPONSE PZS8-1:

- (a) No. The four proposed tariff provisions have not been presented at the SDG&E/SoCalGas Customer Forums or in any other forum.
- (b) Ordering Paragraph (OP) 22 of D.11-04-032 states:

Once San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) post any notice that identifies a reduced receipt point or delivery point capacity, SDG&E and SoCalGas must limit the sale and exchange (recontracting) of firm receipt point capacity to the reduced capacity quantity for that receipt point and transmission zone for the duration of the posted event. SDG&E and SoCalGas must not sell incremental firm receipt point capacity following the announcement of an operational flow order (OFO) for the flow day on which the OFO is called. Once an OFO has been called, SDG&E and SoCalGas may sell only incremental interruptible access capacity for the flow day on which the OFO is called.

In compliance with OP 22 adoption of the four proposed tariff provisions will limit the sale of firm receipt point capacity by SoCalGas to the reduced

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capacity quantity available for that receipt point for the duration of the posted event during the triennial open season for Backbone Transmission Service capacity.

- (c) Tariff provisions proposed and adopted in SoCalGas Advice No. 4240 to implement the limitations described in OP 22 did not include provisions to implement these limitations if they were to occur during the triennial open season process. Adoption of the four proposed provisions in this proceeding would close this gap that currently forces open season customers to contract for a 3 year block of capacity when some periods may be physically unavailable due to known maintenance events.