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March 26, 2008

Advice No. 3847
(U 904 G)

Public Utilities Commission of the State of California

Subject: Revisions to Rule No. 39 – Access to the SoCalGas Pipeline System

Southern California Gas Company (SoCalGas) hereby submits for filing revisions to its Rule No. 39 tariff filed with the California Public Utilities Commission (Commission), applicable throughout its service territory, as shown on Attachment B.

Purpose

This Advice Letter submits revisions to Rule No. 39, Access to the SoCalGas Pipeline System. San Diego Gas & Electric Company (SDG&E) is concurrently filing an Advice Letter seeking similar revisions to its Rule No. 39.

Background

A comprehensive legislative and regulatory framework is currently in place in California to support major expansion of the supply of renewable electric resources and facilities within the State. Companion legislation, Senate Bills 1078 and 107, establish the renewable portfolio standard (RPS) program, which promotes renewable electric energy as a means of meeting the environmental goals of the State and, in particular, of reducing greenhouse gas (GHG) emissions.¹

The State has also acknowledged the important role to be played by biofuels in meeting GHG emission reduction goals. In Executive Order S-06-06, Governor Schwarzenegger established targets to increase the production and use of bioenergy. The Order directs the State to produce a minimum of 20% of its biofuels within California by 2010, 40% by

¹ Senate Bill (SB) 107, Sec. 1, § 25620.1(b)(1) and (3) (Stats. 2006, Ch. 464); Senate Bill (SB) 1078, Sec. 1, § 387(a) (Stats. 2002, Ch. 516).

2020, and 75% by 2050. The Bioenergy Action Plan issued by the Bioenergy Interagency Working Group² in July 2006, declared that “California has large untapped biomass resources, including residues from forestry, urban, and agricultural wastes. Using these resources to produce transportation fuels, electrical energy and biogas will benefit California.”³ The Bioenergy Action Plan recommends mechanisms designed to increase production and use of biomass energy, noting that “[t]he production and use of the state’s considerable biomass resources can achieve progress toward meeting the state’s petroleum reduction, climate change, and renewable energy goals, while providing strategic social, economic, and environmental benefits to California.”⁴

In September 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, which set forth the State’s intent in the effort to reduce GHG emissions. AB 32 also intended to stimulate investment, “in the development of innovative and pioneering technologies [that] will assist California in achieving the statewide limit on emissions of greenhouse gases.”⁵ Most significantly, AB 32 set the ambitious goal of reducing statewide GHG emissions to 1990 levels by 2020 and required the California Air Resources Board (CARB), in consultation with stakeholders, including the Commission, to implement by January 2012, “emission reduction measures...to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gases in furtherance of achieving the statewide greenhouse gas emission limit.”⁶ SoCalGas believes in the mission of AB 32 and is fully committed to supporting the efforts of the State of California to reduce GHG emissions.

To that end, SoCalGas and SDG&E filed their Joint Climate Action Initiative (A.07-08-031) that builds on current successes and establishes a foundation for long-term progress towards reducing GHG emissions in California. The Climate Action Initiative describes several actions that can be taken in the near term so that in the long term renewable energy facilities could be made available at cost levels that are competitive with conventional resources and will require less legislative and regulatory push than is required today. One of the recommendations provided in A.07-08-031 is that the Commission should approve modifications to SoCalGas Rule No. 39 to provide an interconnect allowance in order to increase access to biofuel resources generated from acceptable biofuel sources such as dairies, biomass, and wastewater treatment facilities.

There are more than 1.7 million dairy cows in the state of California. Approximately 40% of these cows are located within the SoCalGas or SDG&E service territory. Collectively, manure from dairies has the potential to produce up to 18 billion cubic feet of methane per

² The Bioenergy Interagency Working Group is comprised of the California Air Resources Board, the California Energy Commission, the California Environmental Protection Agency, the California Dept. of Food and Agriculture, the California Dept. of Forestry and Fire Protection, the California Dept. of General Services, the Integrated Waste Management Board, the California Public Utilities Commission and the Water Resources Control Board.

³ Bioenergy Action Plan, page 1.

⁴ *Ibid.*

⁵ Assembly Bill (AB) 32, Part 1, Ch. 2 § 38501 (e) (Stats. 2006, Ch. 488).

⁶ AB 32, Part 4 § 38562 (a).

year (approximately 50 MMcf/d) in the combined service territories. Although this represents less than 2% of the average system demand, it offers significant incremental resource potential because it is renewable. Moreover, use of this resource would improve the poor air quality in the San Joaquin Valley, where the majority of dairy product production occurs. Although this segment is already attracting significant private development, SoCalGas proposes to further support market development for dairy and other larger-scale pipeline biomethane producers by facilitating interconnection to its system.⁷ For that purpose, SoCalGas proposes that if a biomethane supplier commits to deliver, for at least five (5) years, biogas volumes exceeding an average of 500 Mcf/d, then certain interconnection costs, as described below, would be recovered through current rates paid by all customers. SoCalGas will not seek any incremental cost recovery during the current rate case period.

Since the Commission's consideration of A.07-08-031 has been delayed, SoCalGas is seeking approval of this Advice Letter. This action is consistent with A.07-08-031 where SoCalGas indicated that it would be filing its proposed Rule No. 39 revisions through a separate Advice Letter.⁸ SoCalGas believes its proposed changes to Rule No. 39 would promote the development of substantial and cost-effective biomethane supplies and thus should be expeditiously considered by the Commission.

Rule No. 39

The proposed additions to Rule No. 39 provide an interconnect allowance for a producer and/or supplier of biogas seeking an interconnection point with SoCalGas. SoCalGas believes this change will aid the overall efforts of increasing renewable gas supplies by providing incentives for producers and/or suppliers of biogas to interconnect to the SoCalGas system to deliver biogas to end use customers.

Specifically, if the interconnector is a producer and/or supplier of biogas, contracted and expected to deliver, for at least five (5) years, biogas volumes exceeding an average of 500 Mcf/d into the SoCalGas system, SoCalGas proposes to construct/install all the facilities, as described in Section 3(b) of Form 6430, Interconnect Collectible System Upgrade Agreement (ICSUA), to receive from the interconnection point biogas volumes in an amount up to the interconnection capacity. All the costs of such facilities, excluding any equipment that is unique for receiving biogas supplies at the interconnection point, will be recovered through the rates paid by all customers. The interconnector shall pay SoCalGas for all of its costs (including, but not limited to, SoCalGas' income tax liability) associated with the construction and installation of any equipment that is unique for receiving biogas supplies at the interconnection point. If the interconnector is not contracted and expected to deliver, for at least five (5) years, into the SoCalGas system biogas volumes exceeding an average of 500 Mcf/d, then the interconnector shall either construct/install all of the above-mentioned facilities meeting SoCalGas' specifications or pay SoCalGas for all of its costs (including, but not limited to, SoCalGas' income tax liability) associated with the construction/installation of all of the above-mentioned facilities at the interconnection point.

⁷ Direct Testimony of Jeffrey Reed (A.07-08-031), page III-10.

⁸ Direct Testimony of Jeffrey Reed (A.07-08-031), page III-20.

Regardless of the amount of contracted and expected biogas volumes, the interconnector shall:

- 1) Pay SoCalGas for all operations and maintenance expenses and future equipment upgrades associated with all of the above-mentioned facilities for receiving biogas supplies at the interconnection point.
- 2) Construct/install/maintain, at its own cost, all the facilities necessary, as described in Section 3(b) of Form 6430, ICSUA, on the interconnector's system to deliver at the interconnection point, biogas volumes in an amount up to the interconnection capacity.
- 3) Construct/install/maintain, at its own cost, any pipeline facilities that may be necessary to transport biogas from the production facilities to the interconnection point.
- 4) Obtain firm and/or interruptible receipt point access rights to the SoCalGas system under the provisions of SoCalGas' Schedule No. G-RPA.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date this Advice Letter. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Maria Salinas (mas@cpuc.ca.gov) and to Honesto Gatchalian (jnj@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

Effective Date

SoCalGas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this filing be approved on April 25, 2008, which is 30 calendar days after the date filed.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties to the Greenhouse Gas Proceeding, R.06-04-009.

KEN DEREMER
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Tariffs and Regulatory Accounts

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904-G)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: snewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3847

Subject of AL: Revision to Rule No. 39 - Access to SoCalGas Pipeline System

Keywords (choose from CPUC listing): Rules

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 4/25/08

No. of tariff sheets: 3

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Rule, TOCs

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: None

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

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505 Van Ness Ave.

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

Southern California Gas Company

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¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 3847

(See Attached Service Lists)

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ATTACHMENT B
Advice No. 3847

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 3847
 DECISION NO.
 2R6

ISSUED BY
Lee Schavrien
 Senior Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Mar 26, 2008
 EFFECTIVE _____
 RESOLUTION NO. _____

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(Continued)

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