

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
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November 16, 2017

Rodger R. Schwecke, Senior Vice President  
Gas Transmission, Storage and System Operations  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**Subject: Clarification of Intent of March 16, 2017, Letter from the Executive Director**

Dear Mr. Schwecke:

On October 30, 2017, Southern California Gas Company (SoCalGas) sent a letter to California Public Utilities Commission (CPUC) President Michael Picker and California Energy Commission Chair Robert Weisenmiller regarding the utility's reliability plans for the upcoming winter. I am not responding to the entirety of that October 30 letter, but I wish to clarify one issue raised in that letter.

The SoCalGas October 30 letter references the following passage from a letter I wrote to the utility on March 16, 2017:

To minimize the risk of energy vulnerabilities this summer and provide for sufficient winter inventory levels, SoCalGas should maintain a system wide storage withdrawal capacity level of 2.065 Bcf per day beginning June 1, 2017, and throughout the balance of the safety enhancement project. That amount should be increased as quickly as possible to 2.420 Bcf per day using improvements to withdrawal capacity at each of the fields, including the management of inventory levels and increases to wells in service at all fields. The allocation of the withdrawal capacity across the fields must consider the relative reliability role and impact of each of the fields.

SoCalGas claims that this direction "in effect, imposes a withdrawal protocol on all SoCalGas storage fields."

The passage above was intended to provide summer and beginning of winter targets for storage field withdrawal capacity — not to require that peak withdrawal capacity be maintained at all times. I expect that having met the storage targets before the onset of peak seasons, SoCalGas will act as a prudent manager to withdraw gas from the non-Aliso storage fields as needed to manage its system, and follow the Aliso Canyon Withdrawal Protocol should withdrawal from the Aliso Canyon storage facility become necessary.

If SoCalGas needs further clarifications of my directives, please contact CPUC staff proactively to ensure questions are resolved in a timely manner.

Sincerely,



Timothy J. Sullivan  
Executive Director  
California Public Utilities Commission

CC: President Michael Picker, CPUC  
Edward Randolph, Director, Energy Division  
Dan Skopec, SoCalGas Regulatory Affairs