

DOCKETED

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PG&E's Comments on the California Energy Commission Staff Workshop on California's Natural Gas Infrastructure, Storage, and Supply

Additional submitted attachment is included below.

December 5, 2014

VIA E-COMMENT

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-IEPR-04
1516 Ninth Street
Sacramento, CA 95814-5512

Re: PG&E's Comments on the California Energy Commission Staff Workshop on California's Natural Gas Infrastructure, Storage, and Supply

I. INTRODUCTION

Pacific Gas and Electric Company ("PG&E") appreciates the opportunity to provide comments on the issues covered in the November 18, 2014 California Energy Commission ("CEC") Staff Workshop on California's Natural Gas Infrastructure, Storage, and Supply (the "Workshop"). PG&E's comments focus on the current system capacity, future capacity needs and gas scheduling cycles.

II. PG&E'S BACKBONE SYSTEM CAPACITY NEEDS

The PG&E backbone system has adequate capacity for at least the next ten years. PG&E's forecast of backbone utilization is approximately 76% over the next ten years. Details of PG&E's forecast of capacity utilization are in PG&E's June 26 advice letter filing to the California Public Utilities Commission (CPUC).¹ Additionally, there is adequate gas storage capacity in Northern California to meet expected peak day requirements for the next ten years. However, PG&E is experiencing some residential and commercial load growth on a few local transmission systems and will need to add capacity to those systems in the next two to five years.

III. GAS SCHEDULING CYCLES

There was discussion at the workshop around proposed additional gas scheduling cycles, which PG&E agrees will enhance coordination between the gas and electric markets. However, a change in the start of the gas day is unnecessary and would be counterproductive to the already well-functioning California markets. Particularly, a gas day beginning in the early morning hours would introduce new safety and reliability concerns as outlined in the attached November 28

¹ http://www.pge.com/nots/rates/tariffs/tm2/pdf/GAS_3490-G.pdf

comments PG&E submitted to the Federal Energy Regulatory Commission (FERC). PG&E submitted these comments in response to the FERC's recent Notice of Proposed Rulemaking (NOPR) that seeks to address natural gas and electricity industry coordination challenges through changes to the start of the national gas day.

IV. CONCLUSION

PG&E appreciates the opportunity to comment on the issues discussed at the November 18 Workshop. Please contact me if you have any questions or wish to discuss matters further.

Sincerely,

/s/

Madeline R. Silva