

Natural Gas Program Frequently Asked Questions

What is SPURR?

SPURR is a Joint Powers Authority (JPA), a California public agency formed under the California Government Code's Joint Exercise of Powers Act (the Act). The Act generally authorizes two or more public agencies, by agreement, to jointly exercise any common power, which is generally termed a joint powers agreement. JPAs frequently are formed to aggregate purchasing power and expertise among public agencies. For example, many JPAs are formed to purchase insurance or to operate a services district.

SPURR was formed in 1989 to assist members in procurement of utilities services. SPURR currently has over 280 member K-12 public school districts, community college districts, county offices of education. SPURR also offers its services to other public agencies and, to a limited extent, non-profit agencies. SPURR cannot provide service to individuals or to for-profit entities.

SPURR operates programs for natural gas and electricity commodity supply, solar and energy storage, LED lighting, utilities data management and conservation, electricity demand response, and telecommunications and networking.

What is SPURR's Natural Gas Program?

SPURR aggregates buying power and expertise to provide the best available overall pricing and value for thousands of facilities run by hundreds of participating agencies.

We buy natural gas as our participants would if they each bought tens of millions of therms per year. Specifically, we make wholesaler suppliers compete to sell gas to meet our aggregated usage needs.

SPURR's current wholesale suppliers include BP, ConocoPhillips, Constellation NewEnergy, Direct Energy, EDF Trading, GHI Energy, Pacific Summit Energy, Shell Energy, and Twin Eagle Energy. Only the most reliable and competitive suppliers make the cut. A sample competitive procurement email thread is attached to this FAQ.

Natural gas commodity supplies procured by SPURR are delivered over the pipeline network operated by the local utility natural gas distribution company. SPURR currently offers both "core" and "noncore" service on the PG&E distribution system and can offer "noncore" service on the SoCal Gas and SDG&E systems.

How does the Natural Gas Program benefit program participants?

- Participants obtain competitively sourced access to the wholesale natural gas market, to an extent unavailable to any of them acting alone.
- SPURR serves both types of natural gas accounts, "core" (small) and "noncore" (large). Most accounts are classified as core, under applicable regulation.
- As a public agency, SPURR has the same transparency and supplier neutrality obligations as our constituents. There are no hidden costs or risks.
- Our professionals manage natural gas market complexity for the benefit of our participants. Our team has decades of natural gas experience. None of our program participants have this capability in-house.
- We provide energy market and regulatory updates by email and as bill inserts.

Natural Gas Program Frequently Asked Questions

- SPURR offers rate plan options, such as fixed rate or pool portfolio pricing for increased price certainty for budgetary security, to core and noncore natural gas accounts. We have “default” rate options for core and noncore accounts.
- Our customer service team promptly responds to all participant inquiries, provides historical reports in a variety of formats, and resolves issues that arise regarding natural gas supply. On numerous occasions, we have resolved PG&E data, metering, or service errors for the benefit of our participants.
- Participants operating Compressed Natural Gas stations receive monetary value for low carbon fuel standard (LCFS) credits. Under SPURR’s contract with the winning vendor awarded pursuant to SPURR’s 2020 LCFS Program RFP, participating CNG station operators are projected to receive more than \$0.50 per therm for LCFS credits through June 2025.
- SPURR works to increase choice and reduce energy costs in proceedings before the California Public Utilities Commission (CPUC) and in the Legislature. SPURR is the only representative of our participants in most energy-related proceedings.

Who may participate in the SPURR Natural Gas Program?

Public agencies and non-profit educational entities, whether or not they are members of SPURR, may participate. Non-member participation increases our buying power, for the benefit of all participants.

Currently, UC and CSU campuses, municipal agencies, divisions of the State of California, and non-profit schools participate alongside our member public K-12 school districts, county offices of education, and community college districts.

What level of service reliability do participants receive?

Accounts enrolled in the SPURR program receive the same levels of reliability, at the same transportation rates, as all customers on the utility distribution system. As a convenience to our participants, SPURR includes local utility distribution company (e.g., PG&E) transportation charges on our invoices.

Do participants remain eligible for utility incentives?

Yes. SPURR program participants remain eligible for natural gas incentive programs administered by the local distribution utility, whether PG&E, SoCal Gas, or SDG&E. Incentive programs administered by the local utility are funded by Public Purpose Program (PPP) charges collected from customers, as directed by the CPUC.

How is SPURR governed?

SPURR is governed by a Board of Directors who are all management employees of public school districts, county offices of education, or community college districts. SPURR’s Treasurer agency is the Alameda County Office of Education. SPURR is subject to open meeting laws and is subject to annual financial audit.

What rules has the SPURR Board set for the Natural Gas Program?

The SPURR Board has established a Natural Gas Program Risk Management Policy (“Risk Policy”) to memorialize and define SPURR’s procurement and risk management activities in pursuit of the program’s strategic objectives. This Risk Policy is intended to guide SPURR staff in management of the program and to better inform program participants regarding the goals and operations of the program.

Natural Gas Program Frequently Asked Questions

The SPURR Board has established consumer protection rules applicable to Natural Gas Program core accounts, as required by law.

What are the costs of the SPURR Natural Gas Program for participants?

The SPURR Board sets SPURR Natural Gas Program Administrative Fees in advance of each fiscal year. Admin Fees are recovered as part of the cost of gas and are not additional charges.

For the Fiscal Year Ending June 30, 2021, SPURR Natural Gas Program Administrative Fees are 2.30 cents per therm for core accounts and 0.75 cents per therm for noncore accounts. A history of Administrative Fees is attached. Natural Gas Program Administrative Fees typically change with inflation.

How does the SPURR Natural Gas Program compare to alternate suppliers?

No other supply program has anything close to SPURR's program benefits, listed above. Private natural gas marketers and distribution utility in-house buying groups do not offer transparent, competitive processes that satisfy public agency procurement obligations.

We are occasionally asked to compare our program to the in-house gas buying group at the local distribution utility, PG&E.

This would be an apples-to-oranges comparison. PG&E's in-house buying group **does not offer** many benefits offered by SPURR: (a) competitive procurement by a public agency, (b) rate plan options to protect budgets, (c) screening for PG&E billing errors, (d) customer service with deep knowledge of our program participants, (e) advocacy at the CPUC and in the Legislature to help our participants to reduce costs and risks, (f) commodity supply to "noncore" (large) accounts, or (g) a program for CNG station operators to obtain LCFS credits.

Over the long haul, SPURR core natural gas variable rates usually have been lower than PG&E's in-house buying group's core variable rates, as shown in the attached charts. But since the programs are, in fact, apples-to-oranges, **there is no way to know** whether SPURR's or PG&E's in-house buying group variable rate will be lower than the other in the future.

Also, PG&E has nearly 100 recent felony convictions (mostly for manslaughter), has been accused by regulators of falsifying natural gas safety records, has improperly influenced state regulators, has a long record of working to quash customer choice, and has filed for bankruptcy in 2001 and again in 2019.

Natural Gas Program Frequently Asked Questions

List of Attachments

1. SPURR Natural Gas Program Participant List
2. Sample SPURR wholesale natural gas procurement emails
3. Sample Natural Gas Program Updates
4. Chart of SPURR Natural Gas Program Administrative Fees
5. Historical core natural gas rate chart
6. Historical noncore natural gas rate chart
7. Retrospective comparison of PG&E and SPURR core variable rates
8. Natural Gas Program Risk Management Policy
9. SPURR Consumer Protection Rules, per CA Public Utilities Code sec. 985

SPURR Natural Gas Program Participants, as of September 1, 2020

Ackerman Charter School District	Hydesville Elementary School District	Riverbank School District
Alameda County Office of Education	Jacoby Creek School District	Rocklin Unified School District
Alameda Unified School District	Jefferson Elementary School District	Roseland School District
Albany Unified School District	Kentfield Elementary School District	Roseville City School District
Alum Rock Elementary School District	Kern Community College District	Roseville Joint Union High School District
Amador County Unified School District	Kern County Superintendent of Schools	Sacramento Unified School District
Arcata School District	Kern High School District	Salinas City Elementary School District
Associated Students of UC Davis, Unitrans	King City Union School District	Sanger Unified School District
Atwater Elementary School District	Lakeside Union School District	San Bruno Park School District
Bakersfield City School District	Liberty Union High School District	San Francisco Unified School District
Bellevue Union School District	Lincoln Unified School District	San Jose State University, Student Union
Berkeley Unified School District	Linden Unified School District	San Jose Unified School District
Berryessa Union School District	Live Oak School District	San Leandro Unified School District
Brentwood Union School District	Livermore Valley Joint Unified School District	San Lorenzo Valley Unified School District
Burlingame School District	Lodi Unified School District	San Mateo County Community College District
Butte County Office of Education	Loleta Union School District	San Mateo-Foster City School District
Butte-Glenn Community College	Loomis Union School District	San Mateo Union High School District
Byron Union School District	Los Banos Unified School District	San Rafael City Schools
Cabrillo Unified School District	Los Gatos-Saratoga Union High School District	San Rafael Elementary District
Calaveras Unified School District	Los Gatos Union School District	San Ramon Valley Unified School District
California State University Maritime Academy	Los Rios Community College District	Santa Clara Unified School District
California State University, Monterey Bay	Madera County Superintendent of Schools	Santa Cruz City Schools
Campbell Union High School District	Marin Community College District	Santa Cruz County Office of Education
Campbell Union School District	Marin County Office of Education	Santa Rita Union School District
Carmel Unified School District	Maxwell Unified School District	Scotts Valley Unified School District
Castro Valley Unified School District	Mc Gee Correctional Training Facility	Selma Unified School District
Center Joint Unified School District	Mckinleyville Union School District	Shandon Unified School District
Central Marin Sanitation Agency	Mendocino Lake Community College	Shasta County Office of Education
Central Unified School District	Merced City School District	Sierra Community College
Ceres Unified School District	Merced County Office of Education	Solano Community College
Chabot-Los Positas Community College	Merced Union High School District	Solano County Office of Education
Chowchilla Union High School District	Metropolitan Education District	Sonoma County Junior College District
Chualar Union Elementary School District	Midway School District	Sonoma County Office of Education
Cinnabar Elementary School District	Mill Valley School District	Sonoma Valley Unified School District
City of Stockton	Millbrae School District	South Bay Union School District
Clayton Valley Charter High School	Miller Creek Elementary School District	St. Francis of Assisi
Clovis Unified School District	Milpitas Unified School District	St. Helena Unified School District
Colusa Unified School District	Modesto City Schools	St. Ignatius College Prep
Contra Costa Community College District	Monterey County Office of Education	Standard School District
Correctional Training Facility	Monterey Peninsula Unified School District	Stanislaus Union School District
County of Sonoma	Morgan Hill Unified School District	State Center Community College
Cupertino Union School District	Mt. Diablo Unified School District	Stockton Unified School District
Delhi School District	Mt. Pleasant Elem School District	Sylvan Union School District
Department of Motor Vehicles, Northern CA	Napa Valley College	Taft City School District
Dixon Unified School District	Napa Valley Unified School District	Tamalpais Union High School District
Dos Palos Oro Loma Joint Unified School	Natomas Unified School District	The California Medical Facility
Dry Creek Joint Elementary School District	Nevada Joint Union High School District	Tracy Unified School District
Dublin Unified School District	New Haven Unified School District	Trona Joint Unified School District
East Side Union High School District	Newark Unified School District	Turlock Unified School District
Empire Union School District	Northern Humboldt Parks and Recreation District	Twin Rivers Unified School District
Escalon Unified School District	Northern Humboldt Union High School District	Ukiah Unified School District
Eureka City Schools	Novato Unified School District	Union School District
Eureka Union School District	Oak Grove School District	University of California, Berkeley
Evergreen School District	Oak Grove Union School District	University of California, Berkeley-Housing
Fairfax School District	Oakdale Joint Unified School District	University of California, Davis-Campus
Fairfield-Suisun Unified School District	Ohlone Community College	University of California, San Francisco
Firebaugh-Las Deltas Unified School District	Oroville City Elementary School District	University of the Pacific
Folsom Cordova Unified School District	Oroville Union High School District	Vacaville Unified School District
Foothill DeAnza Community College District	Pacific Grove Unified School District	Washington Colony School District
Fortuna Elementary School District	Pajaro Valley Unified School District	Washington Unified School District
Fortuna Union High School District	Patterson Joint Unified School District	West Contra Costa Unified School District
Fowler Unified School District	Peralta Community College	West County Transportation Agency
Fremont Unified School District	Petaluma City Joint Union School District	West Kern Community College
Fremont Union High School District	Pittsburg Unified School District	Wheatland School District
Fresno Unified School District	Placer County Office of Education	Williams Unified School District
Geyserville Unified School District	Placer Union High School District	Willits Unified School District
Golden Plains Unified School District	Red Bluff Joint Union High School District	Windsor Unified School District
Gonzales Unified School District	Redwood City School District	Winton Elementary School District
Hillsborough City School District	Redwoods Community College District	Wright Elementary School District
Humboldt County Office of Education	Ripon Unified School District	Yolo County Office of Education
Humboldt State University	River Delta Unified School District	Yosemite Community College District

Subject : RE: [EXTERNAL] SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 9:53 am
Linked to : Rand Havens
From : "Havens, Rand L:(Constellation)" <[REDACTED]>
To : Michael Rochman <rochmanm@spurr.org>

Michael, I inserted our CNE current offers in the notes section below. In addition to the monthly price offers- for the Feb-June 5 month strip we offer all the volumes requested at \$3. [REDACTED] now.

From: Michael Rochman <rochmanm@spurr.org>
Sent: Thursday, May 23, 2019 4:16 PM
To: Havens, Rand L:(Constellation) <[REDACTED]>
Subject: [EXTERNAL] SPURR seeking to purchase natural gas

Rand,

SPURR currently seeks to purchase the natural gas shown below.

If Constellation NewEnergy is interested in one or more of these deals, please send us indicative quote(s) by reply e-mail. Please price deals separately from one another.

Please provide indicative quotes not later than 10:00 AM PDT on Fri May 24.

On any NYMEX basis deals, if no conversion to fixed occurs, then final pricing will be last day NYMEX settle +/- the agreed basis.

If you have questions, please let me know.

Regards,
Michael Rochman, Managing Director
School Project for Utility Rate Reduction (SPURR)
1850 Gateway Blvd, Ste 235, Concord, CA 94520
Direct: (925) 609-1140
Office: (925) 743-1292

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Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	CNE offers Index +\$0. [REDACTED]
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	CNE offers \$3. [REDACTED]
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	CNE offers \$3. [REDACTED]
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	CNE offers \$ [REDACTED]
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	CNE offers \$3. [REDACTED]
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed	CNE offers \$ [REDACTED]

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Subject : RE: [EXTERNAL]SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 7:27 am
Linked to : Carla Johnson
From : "Johnson, Carla J." <[REDACTED]>
To : Michael Rochman <rochmanm@spurr.org>

Michael,

ConocoPhillips' non-binding offers have been added to your table below.

Thank you,

Carla J Johnson | Director, West Origination
ConocoPhillips Company
 Commercial, Gas & Power
 20-T156 Spirit One
 925 North Eldridge Parkway
 Houston, TX 77079
 Ofc: [REDACTED]
 Cell: [REDACTED]
 ICE IM: cjohnson1

From: Michael Rochman <rochmanm@spurr.org>
Sent: Thursday, May 23, 2019 6:14 PM
To: Johnson, Carla J. <[REDACTED]>
Cc: Hemmerly, Jim A <[REDACTED]>
Subject: [EXTERNAL]SPURR seeking to purchase natural gas

Carla,

SPURR currently seeks to purchase the natural gas shown below.

If ConocoPhillips Co. is interested in one or more of these deals, please send us indicative quote(s) by reply e-mail. Please price deals separately from one another.

Please provide indicative quotes not later than 10:00 AM PDT on Fri May 24.

On any NYMEX basis deals, if no conversion to fixed occurs, then final pricing will be last day NYMEX settle +/- the agreed basis.

If you have questions, please let me know.

Regards,
 Michael Rochman, Managing Director
 School Project for Utility Rate Reduction (SPURR)
 1850 Gateway Blvd, Ste 235, Concord, CA 94520
 Direct: (925) 609-1140
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Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	COP Offer	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	NGI PGE Citygate +\$0. [REDACTED]	
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	\$3. [REDACTED]	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	\$3. [REDACTED]	
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	\$ [REDACTED]	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	\$3. [REDACTED]	
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed	\$ [REDACTED]	

Subject : RE: SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 9:35 am
Linked to : Kenneth Diel
From : "Diel, Kenneth" <[REDACTED]>
To : Michael Rochman <rochmanm@spurr.org>
Cc : "Diel, Kenneth" <[REDACTED]>

Michael,

Thanks for including us in the below request. I have pasted the table below with valuations included. Please note that the fixed price deals are subject to confirmation as NYMEX moves around quite a bit through the day. I am on my cellular at 609-577-4894 if you would like to discuss

Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	.0
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	3.
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	3.
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	.
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	3.
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed	.

Ken Diel

Director, Gas Business Development

Direct Energy Business | Centrica

194 Wood Avenue South, Second Floor

Iselin, New Jersey 08830

Cell: [REDACTED] (preferred) / Desk: [REDACTED]

ICE Chat: [kdiel1](#)

-

From: Michael Rochman <rochmanm@spurr.org>
Sent: Thursday, May 23, 2019 7:17 PM
To: Diel, Kenneth <[REDACTED]>
Subject: SPURR seeking to purchase natural gas

[External Email]

Kenneth,

SPURR currently seeks to purchase the natural gas shown below.

If Direct Energy Business Marketing, LLC is interested in one or more of these deals, please send us indicative quote(s) by reply e-mail. Please price deals separately from one another.

Please provide indicative quotes not later than 10:00 AM PDT on Fri May 24.

On any NYMEX basis deals, if no conversion to fixed occurs, then final pricing will be last day NYMEX settle +/- the agreed basis.

If you have questions, please let me know.

Regards,

Michael Rochman, Managing Director

School Project for Utility Rate Reduction (SPURR)

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Direct: (925) 609-1140

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June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	

Subject : RE: Friday- SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 9:58 am
Linked to : "Paul Gendron" <[REDACTED]> (Kyle Waddell)
From : "Paul Gendron" <[REDACTED]>
To : "rochmanm@spurr.org" <rochmanm@spurr.org>
Cc : Kyle Waddell <[REDACTED]>, Nikki Palacio <[REDACTED]>
Attachments : \\server12\\apps\\GoldMine\\MailBox\\Attach\\ROCHMANM\\2019\\05\\~gm8000.png;

Hi Again, Quick adjustment, the market moved down in your favor, please see the below refreshed indicative prices:

Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +.	
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed \$3.	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed \$3.	
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed \$1.	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed \$3.	
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed \$	

Thanks!



EDF Trading North America
Paul Gendron, VP Origination

www.edftrading.com

From: Paul Gendron
Sent: Friday, May 24, 2019 9:52 AM
To: 'rochmanm@spurr.org' <rochmanm@spurr.org>
Cc: Kyle Waddell <Kyle.Waddell@edftrading.com>; Nikki Palacio (Nikki.Palacio@edftrading.com) <Nikki.Palacio@edftrading.com>
Subject: FW: Friday- SPURR seeking to purchase natural gas

Hi Michael, Kyle is on vacation today so I'm pinch hitting... Please see the indicative prices below. Please let me know if you have interest.

Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +.0	
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed \$3.	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed \$3.	
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed \$	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed \$3.	
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed \$	

Many Thanks!

Paul



EDF Trading North America
Paul Gendron, VP Origination

Ph [REDACTED]
www.edftrading.com

Subject : RE: SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 8:49 am
Linked to : Joelyn Pineda
From : "" <[REDACTED]>
To : <rochmanm@spurr.org>
Cc : <[REDACTED]>
Attachments : n:\goldmine\tmlinks\image002(9).jpg;

Good Morning Michael,

Please see offers below. Kindly refresh at execution.

Deal	Delivery Month(s)	Total MMBtu	Type	Delivery Pt.	Price
1	Jun-19	31,000	NGI PGE CG	PGE CG	\$ 0.0
2	Feb-20	69,600	Fixed	PGE CG	\$ 3.
3	Mar-20	62,000	Fixed	PGE CG	\$ 3.
4	Apr-20	60,000	Fixed	PGE CG	\$
5	May-20	34,100	Fixed	PGE CG	\$ 3.
6	Jun-20	36,000	Fixed	PGE CG	\$

Warm regards,

Joelyn Pineda | Sales Rep |  Shell Energy North America (US)
 4445 Eastgate Mall Ste 100 San Diego, Ca 92121
 Office: [REDACTED] | Cell: [REDACTED] | Email: [REDACTED]
 We appreciate your business.

Have you heard about Direct Access? California Senate Bill 237 passed opening the Direct Access program ("DA"). DA provides retail electricity customers a way to access wholesale market prices, budget certainty, green energy, along with customer choice in your electricity service provider. If you are interested in DA, please feel free to reach out to your Shell commercial representative, who'd be happy to answer questions.

From: Michael Rochman <rochmanm@spurr.org>

Sent: Thursday, May 23, 2019 4:16 PM

To: Pineda, Joelyn T SENA-STX/A/32 <[REDACTED]>; Anderson, Courtney R SENA-STX/A/36 <[REDACTED]>

Subject: SPURR seeking to purchase natural gas

Joelyn and Courtney,

SPURR currently seeks to purchase the natural gas shown below.

If Shell Energy North America is interested in one or more of these deals, please send us indicative quote(s) by reply e-mail. Please price deals separately from one another.

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If you have questions, please let me know.

Regards,
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February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	

Subject : RE: SPURR seeking to purchase natural gas
Date : Friday, May 24, 2019 9:55 am
Linked to : Brent Fessler
From : "Brent Fessler" <[REDACTED]>
To : Michael Rochman <rochmanm@spurr.org>

Good morning Michael,

Twin Eagle would like to offer the following:

Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	+0.0
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	3.
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	3.
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	3.
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed	

Thanks,
 Brent

From: Michael Rochman <rochmanm@spurr.org>
Sent: Thursday, May 23, 2019 6:15 PM
To: Brent Fessler <[REDACTED]>
Cc: Jerry Hopkins <[REDACTED]>
Subject: SPURR seeking to purchase natural gas

This Message originated outside your organization.

Brent,

SPURR currently seeks to purchase the natural gas shown below.

If Twin Eagle Resource Mgmt is interested in one or more of these deals, please send us indicative quote(s) by reply e-mail. Please price deals separately from one another.

Please provide indicative quotes not later than 10:00 AM PDT on Fri May 24.

On any NYMEX basis deals, if no conversion to fixed occurs, then final pricing will be last day NYMEX settle +/- the agreed basis.

If you have questions, please let me know.

Regards,
 Michael Rochman, Managing Director
 School Project for Utility Rate Reduction (SPURR)
 1850 Gateway Blvd, Ste 235, Concord, CA 94520
 Direct: (925) 609-1140
 Office: (925) 743-1292

SPURR is the Utilities Joint Powers Authority of California Public Schools
Buying Together. Buying Better.

Delivery Start	Delivery End	Days	MMBtu / day	Total MMBtu	Delivery Pt	Price Type	Notes
June 1, 2019	June 30, 2019	30	1,000	31,000	PG&E CityGate	Index: NGI BidWeek First of Month Avg +/-	
February 1, 2020	February 29, 2020	29	2,400	69,600	PG&E CityGate	Fixed	
March 1, 2020	March 31, 2020	31	2,000	62,000	PG&E CityGate	Fixed	
April 1, 2020	April 30, 2020	30	2,000	60,000	PG&E CityGate	Fixed	
May 1, 2020	May 31, 2020	31	1,100	34,100	PG&E CityGate	Fixed	
June 1, 2020	June 30, 2020	30	1,200	36,000	PG&E CityGate	Fixed	

BUDGETING UPDATE AND RATE PLAN OPTIONS FOR CORE NATURAL GAS

Each March, our joint powers authority starts buying natural gas supplies for the next fiscal year. Multiple wholesale vendors, including BP, ConocoPhillips, Constellation, EDF, and Shell Energy, continually compete to supply tens of millions of therms to SPURR's pool, buying on behalf of our schools, colleges, and public agencies. We pass the benefits of wholesale procurement on to our program participants.

Budgeting Recommendation

All-in budgetary costs include SPURR Gas Supply charges (for the gas itself and associated costs) and PG&E Transportation charges (for use of their pipes and meters to deliver the gas and for Public Purpose Program charges). Over 2/3 of all-in costs currently are due to PG&E Transportation charges, which have increased at an alarming rate in recent years, as charted below.

Gas Supply markets change every minute of every trading day. Transportation costs vary for each account, due to tiered rates, and change over time, due to regulatory decisions. Any projection of future rates is necessarily an uncertain estimate. With that in mind, based on current natural gas market conditions and regulatory rulings, the "Most Likely" all-in cost of gas for Fiscal Year Ending June 30, 2021, is \$1.29 per therm.

For budgeting purposes, we recommend using an all-in unit cost of \$1.38 per therm. This is a "High Case" estimate, well within the probable cost range. Still higher costs are possible, as are lower costs.

If you would like help computing your specific natural gas budget, please let us know.

Rate Plan Options

SPURR program participants can elect a Gas Supply rate plan, which may include a mix of Variable Rates, changing every month with the spot markets, and Fixed Rates that are locked in for the fiscal year.

Most participants in SPURR's core natural gas program are on our default rate plan, where we buy 40% of projected usage at a Fixed Rate for the fiscal year, with remaining volumes at Variable Rates.

Since July 2006, SPURR core Variable Rates have averaged \$0.47 per therm, and have varied within a range from \$0.23 per therm (June 2012) to \$1.26 per therm (July 2008). Fixed Rates protect budgets by insulating us against Variable Rate volatility. The Fixed Rate for the coming fiscal year will be determined as a result of the competitive procurements that we are starting now.

SPURR program participants can choose a non-default rate plan; for example, Fixed Rates could be applied to 60% of projected usage or to 0% of usage. There is no way to know in advance whether one rate plan will be cheaper than another, as that would require knowledge of the future. You can see your current rate plan noted at the top of your SPURR invoice. Your current rate plan will remain in place until you tell us to change it.

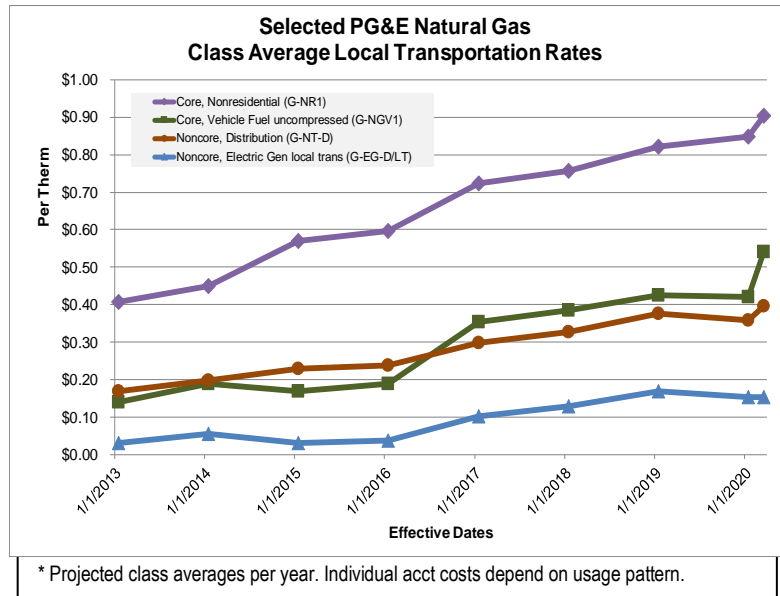
If you would like a non-default rate plan for next fiscal year, please let us know **by March 31**.

Please Note

- This update applies to "core" natural gas accounts, defined by regulators as accounts using less than 250,000 therms per year at one meter.
- CNG and Residential (on G-NGV or G-1 tariffs) core accounts have different budgetary recommendations, due to different PG&E Transport tariff charges.
- "Noncore" accounts (G-NT) have a separate SPURR program, with separate budgetary advice.

For more information, please call (925) 743-1292 or email ManagingDirector@spurr.org.

March 2, 2020



COVID-19 UPDATE FOR SPURR CORE NATURAL GAS PROGRAM

We wanted to update you on how the COVID-19 pandemic affects our aggregated natural gas procurement program for core* accounts.

We hope that you, your loved ones, and those around you are well. To safeguard our health, SPURR staff currently is working primarily from home. Gas program invoices are being issued slightly later than usual. We apologize for any inconvenience.

We are available to answer your questions during regular business hours by phone, at our regular numbers. For questions related to bills, payments, or service accounts, please call 888-400-2455 or email billing@spurr.org. For other questions, please email RochmanM@spurr.org.

With respect to our procurement activities, the pandemic creates unprecedented uncertainty in supply projections – for natural gas and every other good or service. In our case, statewide Shelter In Place (SIP) orders have caused drastic declines in program participant gas usage.

According to preliminary meter data, SPURR core pool usage has declined by more than 55% from “normal” weather-adjusted usage since mid-March. The actual decline could be 60% or more during the pendency of SIP orders.

This creates significant challenges for our gas procurement planning. Prior to each fiscal year, we buy Fixed Rate supplies through a competitive process at wholesale on behalf of nearly four thousand participating school, college, and municipal agency service accounts in Northern California. Most core natural gas program participants are on our default rate plan, where we buy 40% of their projected usage at a Fixed Rate for the fiscal year, with remaining volumes at Variable Rates that change monthly. Some participants have chosen other rate plans, with higher or lower shares of Fixed Rates.

To meet our participant's Fixed Rate needs, we buy specific quantities at wholesale for each month of the year. To illustrate, suppose that projected usage in a month is 4.0 million therms based on history and we need to buy 40% at a Fixed Rate, or 1.6 million therms. Actual Fixed Rate quantities, known only in retrospect, may vary from Fixed Rate projections by 15%+/- as a result of colder or warmer than average weather. In most cases, normal weather variations tend to balance out over time.

We now face a massive, new usage variable – program participant facility closures due to SIP orders of indeterminate length. And that may recur at any time.

To adapt to this unprecedented situation, in our core pool for the remainder of the fiscal year ending June 2020, SPURR may change the Fixed Rate supply to match the actual usage pattern. For example, those on a 40% Fixed Rate plan may receive more than 40% of their actual usage at a Fixed Rate for April, May, or June 2020.

For the Fiscal Year ending June 2021, SPURR will buy less Fixed Rate supply than we otherwise would purchase, to anticipate possible SIP orders that may occur through FYE June 2021 year. For example, those on a 40% Fixed Rate plan may receive less than 40% of their actual usage at a Fixed Rate.

The good news is that your gas bills will be much smaller than usual while SIPs persist.

Please call or write with any questions you may have regarding this topic.

Please Note

* This update applies to “core” natural gas accounts, defined by regulators as accounts using less than 250,000 therms per year at one meter. Over 99% of meters in SPURR's natural gas aggregation are core meters. Large “noncore” accounts, located primarily at community college campuses, have a separate SPURR procurement process.

April 15, 2020

COVID-19 UPDATE FOR SPURR CORE* NATURAL GAS PROGRAM

We hope that you, your loved ones, and those around you are well.

SPURR staff currently is working primarily from home. We are available to answer your questions during regular business hours by phone, at our regular numbers. For questions related to bills, payments, or service accounts, please call 888-400-2455 or email billing@spurr.org. For other questions, please email RochmanM@spurr.org.

As noted in our April 15 update, Shelter In Place (SIP) orders have caused declines in program participant gas usage, which requires changes in program invoicing.

Prior to each fiscal year, for participants with some level of Fixed Rates in their rate plan, SPURR buys Fixed Rate supplies through a competitive process at wholesale. To meet our participant's Fixed Rate needs, we buy specific quantities at wholesale for each month of the year from ConocoPhillips, BP Energy, Shell Energy, etc., to meet our pool's projected needs.

According to preliminary data, SPURR core pool usage has declined by 40% or more from "normal" weather-adjusted usage during the pendency of SIP orders.

Consequently, for the remainder of this fiscal year, ending June 30, 2020, we have excess Fixed Rate supplies, due solely to SIP shutdowns that have cut program participant usages far below projected levels. For April, May, and (probably) June 2020, we will make the following adjustments in our core rate invoices.

- Program participants on the Pool20PctFixed plan will be allocated 45% of usage at the fixed rate.
- Program participants on the Pool40PctFixed plan will be allocated 75% of usage at the fixed rate.
- Program participants on the Pool60PctFixed plan have been allocated 85% of usage at the fixed rate.

For the Fiscal Year ending June 2021, SPURR will buy less Fixed Rate supply than we otherwise would purchase, to anticipate SIP or similar orders that may occur through the year. For example, those on a 40% Fixed Rate plan may receive less than 40% of their actual usage at a Fixed Rate. We are in process of executing that procurement plan and will provide additional updates later.

The good news is that your gas bills will be much smaller than usual while SIPs persist.

Please call or write with any questions you may have regarding this topic.

Please Note

* This update applies to "core" natural gas accounts, defined by regulators as accounts using less than 250,000 therms per year at one meter. Over 99% of meters in SPURR's natural gas aggregation are core meters. Large "noncore" accounts, located primarily at community college campuses, have a separate SPURR procurement process.

May 8, 2020

COVID-19 UPDATE FOR SPURR CORE* NATURAL GAS PROGRAM

SPURR staff currently is working primarily from home. We are available to answer your questions during regular business hours. For questions related to bills, payments, or service accounts, please call 888-400-2455 or email billing@spurr.org. For other questions, please email RochmanM@spurr.org.

Prior to each fiscal year, for participants with some level of Fixed Rates in their rate plan, SPURR buys Fixed Rate supplies through a competitive process at wholesale. To meet our participant's projected Fixed Rate usage, we buy specific quantities at wholesale for each month of the year from ConocoPhillips, BP Energy, Shell Energy, etc., to meet our pool's projected needs.

In a normal year, actual usage in our pool varies from projected usage due to variations in weather, as well as due to operational or equipment changes at sites supplied in our pool. This year, due to COVID-19, we are all in uncharted waters.

There is no way to know in advance how much gas participants in our pool will burn in the Fiscal Year Ending June 30, 2021, due to unprecedented levels of uncertainty regarding participant site operations.

For the delivery during FYE June 2021, we will buy less Fixed Rate supply at wholesale than we would have bought for prior fiscal years. As we move through the year, we may adjust the amount of Fixed Rate supply that you receive accordingly.

For example, participants on the Pool40PctFixed plan may be allocated more, or less, than 40% of their actual usage at the Fixed Rate in a given month. Whenever we vary the Fixed Rate allocation from what you would have expected based on your rate plan, that will be noted as a "COVID" variance on the line item description of rates in each SPURR invoice.

Please note that this issue does not affect Variable Rates in the SPURR core pool and it does not affect any Custom Rates in the SPURR core pool.

Please call or write with any questions you may have regarding this topic.

Please Note

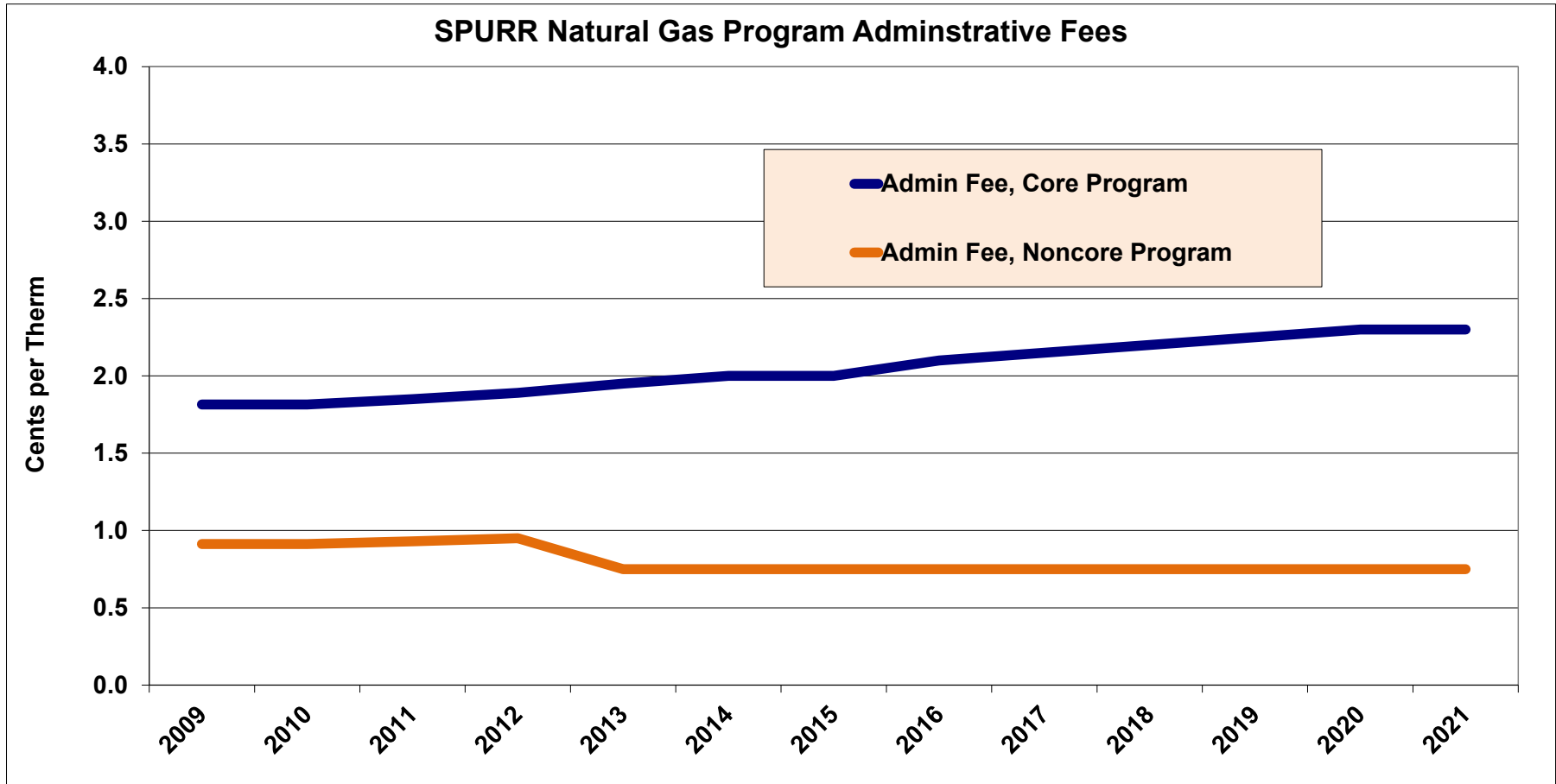
* This update applies to "core" natural gas accounts, defined by regulators as accounts using less than 250,000 therms per year at one meter. Over 99% of meters in SPURR's natural gas aggregation are core meters. Large "noncore" accounts, located primarily at community college campuses, have a separate SPURR procurement process.

August 7, 2020

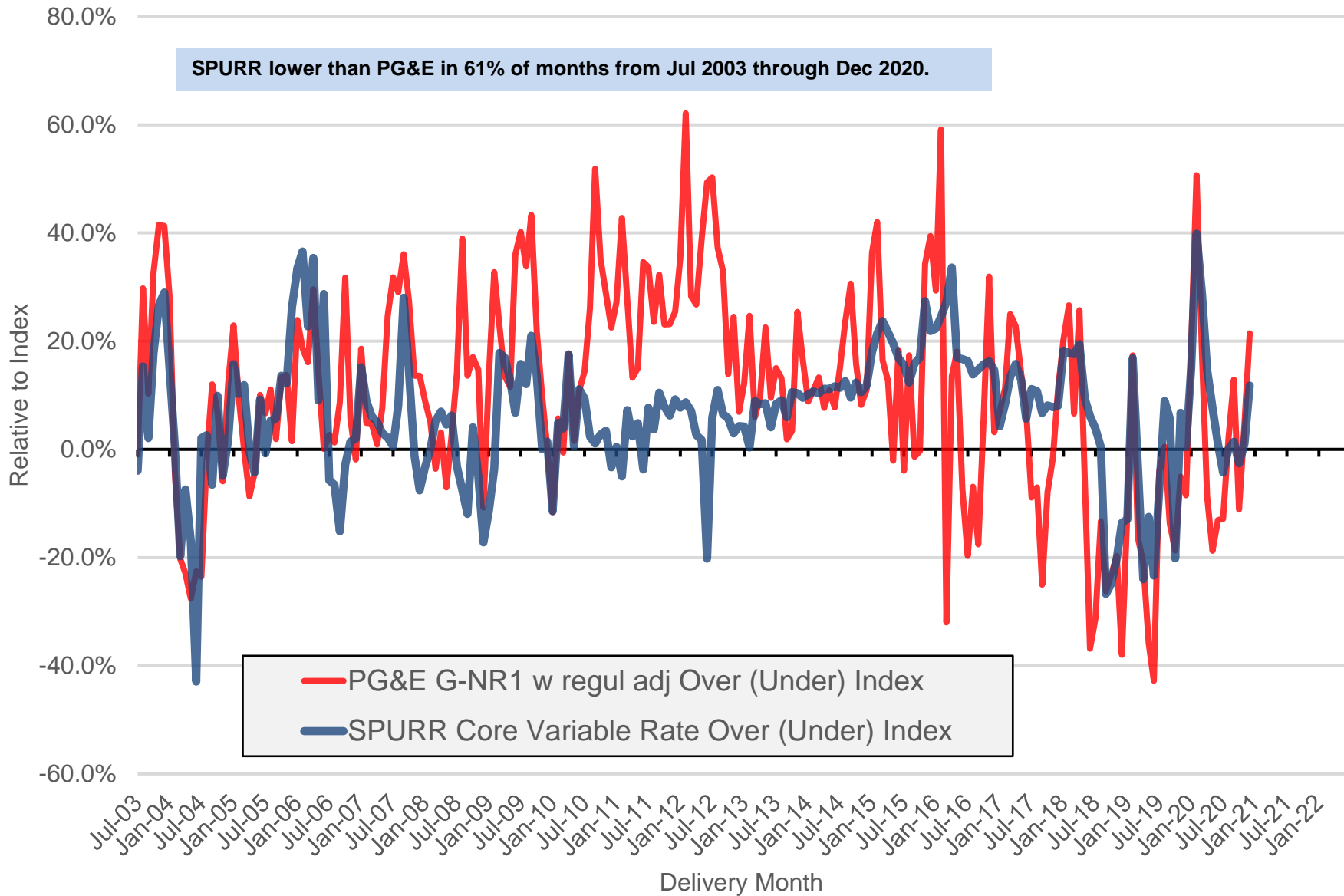
SPURR Natural Gas Program Administrative Fees

Included in Gas Supply Rates. Separate fees also apply to Low Carbon Fuel Standard Program for CNG stations.
In Cents per Therm

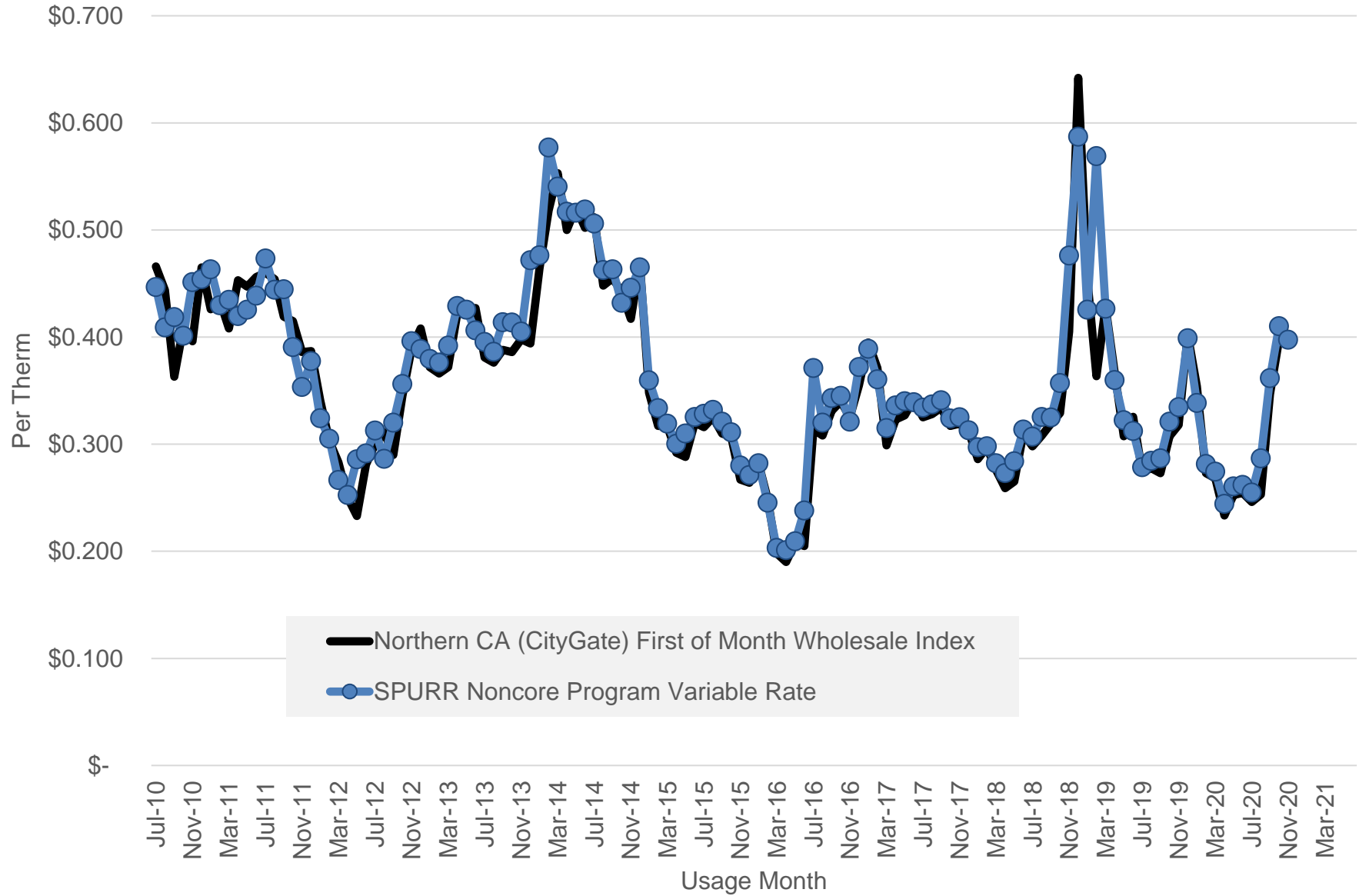
Fiscal Year Ending June 30	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Admin Fee, Core Program	1.815	1.815	1.850	1.890	1.950	2.000	2.000	2.100	2.150	2.200	2.250	2.300	2.300
<i>Change over prior period</i>		0.0%	1.9%	2.2%	3.2%	2.6%	0.0%	5.0%	2.4%	2.3%	2.3%	2.2%	0.0%
Admin Fee, Noncore Program	0.913	0.913	0.930	0.950	0.750	0.750	0.750	0.750	0.750	0.750	0.750	0.750	0.750
<i>Change over prior period</i>		0.0%	1.9%	2.2%	-21.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%



Core Variable Rates, Compared to "First of Month" CityGate Index



SPURR Noncore Variable Rates track index
Fixed Rates also available



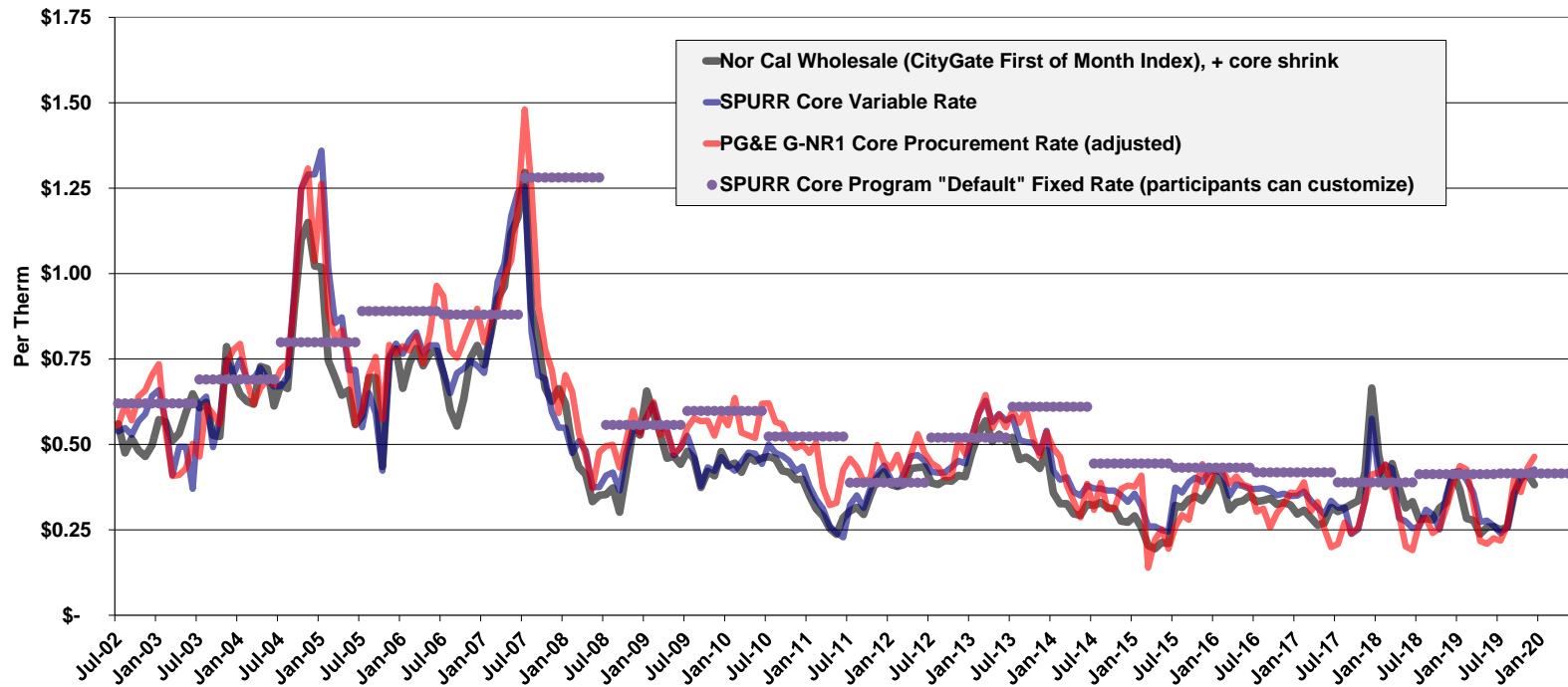
Core Natural Gas Supply Commodity Rates, per therm

Fiscal Year	Unweighted Avg Nor CA Monthly Index + core shrink	Unweighted Avg Monthly SPURR Core Program Variable Rate	Unweighted Avg, Monthly PG&E G-NR1 Procurement Rate
06/07	\$0.699	\$0.709	\$0.758
07/08	\$0.814	\$0.851	\$0.901
08/09	\$0.632	\$0.616	\$0.744
09/10	\$0.472	\$0.500	\$0.525
10/11	\$0.441	\$0.449	\$0.564
11/12	\$0.358	\$0.376	\$0.474
12/13	\$0.377	\$0.399	\$0.451
13/14	\$0.458	\$0.504	\$0.509
14/15	\$0.394	\$0.453	\$0.469
15/16	\$0.266	\$0.320	\$0.305
16/17	\$0.345	\$0.388	\$0.369
17/18	\$0.311	\$0.346	\$0.307
18/19	\$0.390	\$0.344	\$0.304
19/20	\$0.299	\$0.323	\$0.299
Grand Total	\$0.447	\$0.470	\$0.498

Notes

- * Unweighted averages do not account for timing of usage, or SPURR storage injections and withdrawals. Rates shown are for gas supply commodity only, and do not include local transportation charges.
- * PG&E does not offer fixed or other structured rates, so SPURR's Variable Rate is the closest comparison to G-NR1. PG&E's G-NR1 rates through 2010 adjusted to reflect benefits to SPURR participants under CPUC Decisions 03-10-087 (EPNG Settlement), 04-01-047 (EPNG Capacity), 05-06-029 (BCAP core "deaveraging" settlement), and 10-01-024 (Semptra Settlement).
- * SPURR offers multiple rate plans. SPURR's default core rate plan is 40% Fixed Rate and 60% Variable Rate. However, each core program participant can choose a different rate plan, including 0%, 20% or 60% Fixed, or other plans.
- * SPURR's Fixed Rates are obtained at start of each fiscal year, and apply for the entire fiscal year, to provide budgetary certainty. SPURR rates include all admin charges, utility shrink, "utility stranded costs," and other commodity costs.

Monthly Core Natural Gas Supply Commodity Rates



Natural Gas Program Commodity Risk Management Policy

Version

Presented to the SPURR Board of Directors on February 1, 2019.

Executive Summary

This Natural Gas Program Commodity Risk Management Policy (“Risk Policy”) memorializes and defines SPURR’s natural gas procurement and risk management activities in pursuit of the program’s strategic objectives.

This Risk Policy is intended to guide SPURR staff in management of the program and to better inform program participants regarding the goals and operations of the program.

Risk Policy Details

Component	Description
Risk Governance	Risk Policy is reviewed and approved by the Board of Directors (Board) annually. The Board is comprised of management level employees of public K-14 districts, as prescribed in the SPURR Bylaws. The Board meets at least twice annually, with additional meetings as needed.
Strategic Objectives	SPURR seeks to achieve the following procurement objectives on behalf of its program participants: <ul style="list-style-type: none">○ Procure the lowest available cost of natural gas commodity, based on competitive offers from wholesale suppliers;○ Offer hedged rate options to lower commodity volatility risk; and,○ Implement structures to support compliance with applicable laws and regulations.
Roles & Responsibilities	Lines of authority and responsibility for managing and controlling risk are clearly delineated. Appropriate separation of personnel among procurement and risk management, nominations, and settlement and accounting.

Natural Gas Program Commodity Risk Management Policy

Component	Description
Market Risk Management	<p>SPURR is authorized to enter into the following natural gas physical and financial contracts, within defined market risk related limits, and with approved counterparties (suppliers, financial entities, or exchanges) to achieve its strategic objectives and program offerings.</p> <p>No speculative transacting activity is permitted.</p> <p><i>Physical:</i></p> <ul style="list-style-type: none"> ○ Natural Gas Purchase and Sale Contracts ○ Natural Gas Pipeline or Transportation Contracts ○ Natural Gas Storage Contracts <p><i>Financial:</i></p> <ul style="list-style-type: none"> ○ Over-the-counter (“OTC”) Derivatives (e.g., Swaps, Forwards and Options); for example, SPURR may procure caps and fixed-for-floating swaps to limit volatility. ○ Exchange Traded Swaps, Financial Futures and Options; for example, SPURR may procure caps and fixed-for-floating swaps to limit volatility. ○ Structured transactions comprised of combinations of OTC and Exchange Traded instruments to meet specific customer requests. <p><i>Limits:</i></p> <ul style="list-style-type: none"> ○ Volumetric: Procurement solely to meet reasonably projected load, and to address imbalances caused by utility reporting practices. SPURR will not intentionally create imbalances greater than 15% of historical annual load. ○ Tenor: As a default, SPURR will not procure commodity supplies beyond the end of the next fiscal year. However, SPURR may offer individual participants “customized” procurements beyond that term. <p>SPURR will maintain appropriate transaction capture and position management systems to price, measure, monitor, view, manage and report its portfolio of natural gas exposures and assets.</p>

Natural Gas Program Commodity Risk Management Policy

Component	Description
Credit Risk Management	SPURR will execute natural gas supply agreements with reputable counterparts (e.g., producers, marketers, suppliers, utilities, and financial institutions). Counterparties will be evaluated periodically to ensure supplier risk is appropriately diversified and does not expose SPURR to unnecessary counterparty credit exposure.
Related Controls	<p>SPURR will implement risk related business processes and controls such as:</p> <ul style="list-style-type: none">○ Internal controls (e.g., forecasting, transacting, logistics/ nominations, confirmations, settlement and accounting)○ Risk analysis (e.g., individual and portfolio risk identification, valuation and measurement)○ Report monitoring and management (e.g., total position report, open position, management's analysis of individual strategies and portfolio performance)○ Compliance and enforcement (e.g., staff compliance with the Risk Policy and Board enforcement for non-compliance)○ Independent financial audit of the program on an annual basis

SCHOOL PROJECT FOR UTILITY RATE REDUCTION

RESOLUTION NO. 2017 - 03

RESOLUTION OF THE BOARD OF DIRECTORS REGARDING RULES TO IMPLEMENT MINIMUM STANDARDS UNDER PUBLIC UTILITIES CODE SECTION 985

RESOLVED, by the Board of Directors (the "Board") of the School Project for Utility Rate Reduction ("SPURR"), as follows:

WHEREAS, California Public Utilities Code Section 985 ("Section 985") requires that "the governing body of a public agency offering gas services to core gas customers within its jurisdiction" shall adopt "rules that implement . . . minimum standards" for consumer protection as specified in Section 985 with respect to the following topics: customer confidentiality, physical disconnects and reconnects, change in providers, written notices, billing, meter integrity, customer deposits, and additional protections for gas consumers.

WHEREAS, SPURR is a public agency offering gas services to core gas customers within its jurisdiction.

WHEREAS, SPURR wishes to implement rules to codify past practice and to continue to implement its consumer protection practices, in conformity with Section 985.

NOW, THEREFORE, it is hereby DETERMINED and ORDERED as follows:

- 1) The above recitals are true and correct.
- 2) The Board hereby adopts the rules set forth in Exhibit A to this Resolution (the "SPURR Section 985 Rules").
- 3) The Board hereby finds and determines that the SPURR Section 985 Rules conform to SPURR's prior practices.
- 4) Effective Date. This Resolution shall take effect upon its adoption by this Board.

* * * * *

THE FOREGOING RESOLUTION is approved and adopted by the Board of Directors of the School Project for Utility Rate Reduction this 21st day of June, 2017, by the following vote of the members thereof:

AYES: C. Allen, J. Potter, G. Senestraro, S. Siegel, B. Stephens

NOES: None

ABSTAIN: None

ABSENT: P. Bielen, L. Legaspi, J. Quinto, Y. Radonov, K. Temple

By: 

Michael Rochman, Managing Director

ATTEST:

By: 

John Quinto, Board VP / Clerk

**EXHIBIT A TO SPURR BOARD RESOLUTION 2017-03
ADOPTED JUNE 21, 2017**

SPURR SECTION 985 RULES

Standards specified in California Public Utilities Code Section 985	Corresponding SPURR Rules
(a) Confidentiality. Customer information shall be confidential unless the customer consents in writing. This shall encompass confidentiality of customer-specific billing, credit, or usage information. This requirement shall not extend to disclosure of generic information regarding the usage, load shape, or other general characteristics of a group or rate classification, unless the release of that information would reveal customer-specific information because of the size of the group, rate classification, or nature of the information.	SPURR shall not disclose to third parties any billing, credit, or usage information specific to any SPURR gas program participant ("Participant"), except with the written consent of the participant; provided, that SPURR may, in its discretion, disclose information (a) that would not reveal Participant-specific billing, credit, or usage information, (b) to SPURR's program service providers, as reasonably necessary or appropriate to implement SPURR programs, (c) as otherwise required by law.
(b) Physical disconnects and reconnects. Only a gas corporation, or a publicly owned gas utility, that provides physical delivery service to the affected customer shall have the authority to physically disconnect or reconnect a customer from the transmission or distribution grid. Physical disconnection by gas corporations subject to the commission's jurisdiction shall occur only in accordance with protocols established by the commission. Physical disconnection by publicly owned gas utilities shall occur only in accordance with protocols established by the governing board of the local publicly owned gas utility.	SPURR does not have the authority to physically disconnect or reconnect a Participant from the transmission or distribution grid. SPURR shall not represent that it has such authority.
(c) Change in providers. Upon adequate notice supplied by a core transport agent to the gas corporation or local publicly owned gas utility providing physical delivery service, customers who are eligible for core transport service may change their energy supplier. Energy suppliers may charge for this change, provided that any fee or penalty charged by the supplier associated with early termination of service, shall be disclosed in that contract or applicable tariff.	Fees or penalties charged by SPURR for natural gas service shall be as set forth in written agreements between SPURR and the Participant. SPURR shall not enter unwritten natural gas agreements with Participant. A Participant may change its energy supplier subject to any early termination fee or penalty as set forth in the applicable written agreement between SPURR and the Participant,
(d) Written notices. Notices describing the terms and conditions of service as described in Section 986, service agreements, notices of late payment, notices of discontinuance of service, and disconnection notices addressed to core gas customers shall be easily understandable	SPURR's terms and conditions of service, service agreements, notices of late payment, and notices of discontinuance of service, shall be written in easily understandable language. All SPURR communications with Participants shall be in English.

**EXHIBIT A TO SPURR BOARD RESOLUTION 2017-03
ADOPTED JUNE 21, 2017**

Standards specified in California Public Utilities Code Section 985	Corresponding SPURR Rules
and shall be provided in the language in which the core transport agent offered the services.	
(e) Billing. All bills shall have a standard bill format, as determined by the commission or the governing body, and shall contain sufficient detail for the customer to recalculate the bill for accuracy. Any late fees shall be separately stated. A core transport agent shall provide on all customer bills a telephone number by which customers may contact the core transport agent to report and resolve billing inquiries and complaints. A core transport agent contacted by a customer regarding a billing dispute shall advise the customer at the time of the initial contact that the customer may file a complaint with the commission if the customer's dispute is not satisfactorily resolved by the core transport agent.	SPURR natural gas bills shall have a standard format, which is currently in use and which is hereby ratified as adequate. SPURR staff may revise the bill formats from time to time; provided, that all SPURR natural gas bills shall continue to contain, at a minimum, the following information for each account: ID number, service address, meter read start and end dates, quantity(ies) consumed, rate(s) applied, and total costs. All SPURR natural gas bills shall provide a telephone number and email address by which Participants may contact SPURR to report and resolve billing inquiries and complaints.
(f) Meter integrity. A gas customer shall have a reasonable opportunity to have his or her meter tested to ensure the reasonable accuracy of the meter. The commission or governing body shall determine who is responsible for the cost of that testing.	SPURR does not have authority to grant or restrict access to natural gas meters, which are under the sole authority of the local distribution company. SPURR shall not represent that it has such authority.
(g) Customer deposits. Core transport agents may require customer deposits before commencing service, but in no event shall the deposit be more than the estimated bill for the customer for a three-month period.	SPURR does not currently require Participant deposits before commencing service. If SPURR were to require such a deposit, the amount of the deposit shall not be more than the estimated bill for the Participant for a three-month period, as reasonably estimated by SPURR.
(h) Additional protections. The commission or the governing body may adopt additional core gas consumer protection standards that are in the public interest.	SPURR has not adopted additional formal consumer protection standards at this time.