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August 26, 2003

Advice No. 3286
(U 904 G)

Public Utilities Commission of the State of California

Subject: Establishment of Blythe Operational Flow Requirement Memorandum Account

Southern California Gas Company (SoCalGas) hereby submits for filing with the California Public Utilities Commission (Commission) revisions to SoCalGas' tariff schedules, applicable throughout its service territory, as shown on Attachment B.

Purpose

This filing revises Preliminary Statement, Part VI, Description of Regulatory Accounts – Memorandum, and establishes the Blythe Operational Flow Requirement Memorandum Account (BOFRMA). SoCalGas hereby requests that the Commission approve the BOFRMA as described herein. The purpose of the BOFRMA is to record certain charges associated with SoCalGas' Gas Acquisition Department purchasing and delivering gas to sustain operational flows at Blythe. Additionally, this filing revises Preliminary Statement, Part VIII, Gas Cost Incentive Mechanism (GCIM), to add section C.6.j., to indicate that charges or credits to the BOFRMA will be an adjustment to GCIM costs.

Background

SoCalGas must receive certain minimum quantities of gas at Blythe¹ to ensure that adequate gas is available to maintain deliveries to customers connected to the southern portion of its system. SoCalGas' System Operator² determines these minimums based on its forecast of system needs. When shippers' anticipated deliveries of gas are not expected to meet the required Blythe minimum flow levels, SoCalGas' Gas Acquisition Department is called upon to purchase additional quantities of gas to provide the necessary support to the SoCalGas system. These deliveries are outside of the purchases Gas Acquisition would otherwise make to meet the supply needs of SoCalGas' Core customers. Depending upon market conditions, these system support purchases by Gas Acquisition can result in significant additional procurement costs for SoCalGas' Core procurement (Core) customers.

¹ Blythe is the southernmost of the two SoCalGas points of interconnection with the El Paso Natural Gas Company (EPNG) pipeline.

² The SoCalGas System Operator refers to the function performed by SoCalGas' Gas Operations Department.

SoCalGas notes that with the recent Kern River expansion, shippers may choose to shift their deliveries to the northern part of the SoCalGas system during the upcoming winter heating season. This shift in deliveries away from Blythe could result in a significant potential cost burden to SoCalGas' Core customers.

SoCalGas proposes that the BOFRMA be established to capture charges associated with meeting the Blythe minimum flow requirements. On days when Gas Acquisition is called upon by SoCalGas' System Operator to provide support at Blythe, the first 355 MMcfd of its deliveries into Blythe will be treated as ordinary charges incurred on behalf of the Core portfolio.³ For volumes in excess of the Core's commitment of 355 MMcfd for deliveries into Blythe, the BOFRMA will be charged at a rate equal to the applicable daily basin index price plus the full transportation rate on EPNG delivered into SoCalGas, less the Southern California bidweek border price for that month. The memorandum account will be an interest bearing account.

SoCalGas anticipates that entries to the BOFRMA as proposed will only be appropriate until the expiration of the majority of SoCalGas' current transportation agreements with EPNG or until a new procedure for supporting the Blythe minimum flow requirements is implemented by the Commission, whichever comes first. SoCalGas further proposes that the allocation of any recorded balance to the BOFRMA be addressed in its next Biennial Cost Allocation Proceeding (BCAP).

All Gas Acquisition purchases for supporting the Blythe minimum flow levels will be recorded directly to the PGA. Charges or credits to the BOFRMA will be an adjustment to actual GCIM costs.

Communications between SoCalGas' System Operator and Gas Acquisition Department remain subject to Remedial Measure 16, pursuant to D.98-03-073.

Protest

Anyone may protest this Advice Letter to the California Public Utilities 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 was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Energy Division - IMC Branch
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Jerry Royer (jjr@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.

³ 355MMcfd represents the Gas Acquisition Department's reservation at Blythe on behalf of its Core customers adopted in D. 01-12-018.

Attn: Sid Newsom
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Effective Date

SoCalGas respectfully requests that this advice letter be approved on October 5, 2003, which is not less than forty (40) days regular statutory notice.

Notice

In accordance with Section III.G of General Order No. 96-A, a copy of this advice letter is being sent to the parties listed on Attachment A, which includes the parties in SoCalGas' GCIM Year 9 Application No. (A.) 03-06-021, which is the same as GCIM Year 7 A.01-06-027.

J. STEVE RAHON
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Attachment

ATTACHMENT A

Advice No. 3286

(See Attached Service Lists)

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ATTACHMENT B
Advice No. 3286

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 36866-G	PRELIMINARY STATEMENT, PART VI, DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM, Sheet 1	Revised 35357-G
Revised 36867-G	PRELIMINARY STATEMENT, PART VI, DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM, Sheet 19	Original 35359-G
Original 36868-G	PRELIMINARY STATEMENT, PART VI, DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM, Sheet 20	
Revised 36869-G	PRELIMINARY STATEMENT, PART VIII, GAS COST INCENTIVE MECHANISM, Sheet 4	Revised 35879-G*
Revised 36870-G	PRELIMINARY STATEMENT, PART VIII, GAS COST INCENTIVE MECHANISM, Sheet 5	Revised 35880-G
Revised 36871-G	TABLE OF CONTENTS	Revised 36865-G

PRELIMINARY STATEMENT

Sheet 1

PART VI
DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM

A. GENERAL

Memorandum accounts are special accounts authorized by the Commission for the purpose of tracking certain costs and revenues. Please refer to each individual memorandum account description for the specific accounting treatment applicable to each account.

B. LISTING OF MEMORANDUM ACCOUNTS

- Conservation Expense Account (CEA)
- PCB Expense Account (PCBEA)
- Research Development and Demonstration Expense Account (RDDEA)
- Curtailed Violation Penalty Account (CVPA)
- Economic Practicality Shortfall Memorandum Account (EPSMA)
- Catastrophic Event Memorandum Account (CEMA)
- Interconnect Charge Memorandum Account (ICMA)
- Vernon Avoided Distribution Cost Memorandum Account (VADCMA)
- Noncore Cost/Revenue Memorandum Account (NCRMA)
- Interstate Capacity Step Down Account (ICSDA)
- Vernon Rate Savings Memorandum Account (VRSMA)
- Vernon Negotiated Core Contract Memorandum Account (VNCCMA)
- Earthquake Valve Installation Service Memorandum Account (EVISMA)
- Research Royalty Memorandum Account (RRMA)
- NGV Research Development & Demonstration Memorandum Account (RDDNGV)
- Intervenor Award Memorandum Account (IAMA)
- Z Factor Account (ZFA)
- Tax Interest Account (TIA)
- Energy Efficiency/DSM Memorandum Account (EEDSMMA)
- Applicant Installation Trench Inspection Memorandum Account (AITIMA)
- Wheeler Ridge Firm Access Charge Memorandum Account (WRFACMA)
- Earthquake Valve Installation Memorandum Account (EVIMA)
- Gas Industry Restructuring Memorandum Account (GIRMA)
- Self-Generation Program Memorandum Account (SGPMA)
- Baseline Memorandum Account (BMA)
- Blythe Operational Flow Requirement Memorandum Account (BOFRMA)

C. DESCRIPTION OF ACCOUNTS

CONSERVATION EXPENSE ACCOUNT (CEA)

The CEA is an interest bearing memorandum account recorded on SoCalGas' financial statements. The purpose of this account is to track the difference between authorized costs in rates, and actual demand-side management program costs. This account covers regular and low income demand-side management programs.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 3286
 DECISION NO.

ISSUED BY
Lee Schavrien
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Aug 26, 2003
 EFFECTIVE Oct 5, 2003
 RESOLUTION NO. _____

PRELIMINARY STATEMENT

Sheet 20

PART VI
DESCRIPTION OF REGULATORY ACCOUNTS - MEMORANDUM

(Continued)

C. DESCRIPTION OF ACCOUNTS (Continued)

BLYTHE OPERATIONAL FLOW REQUIREMENT MEMORANDUM ACCOUNT (BOFRMA)
(Continued)

b) An entry equal to the interest on the average balance in the account during the month, calculated in the manner described in the Preliminary Statement, Part I, J.

The disposition of the BOFRMA balance shall be determined in SoCalGas' Biennial Cost Allocation Proceeding (BCAP).

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(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 3286
DECISION NO.

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ISSUED BY

Lee Schavrien
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

DATE FILED Aug 26, 2003
EFFECTIVE Oct 5, 2003
RESOLUTION NO. _____

PRELIMINARY STATEMENT
PART VIII
GAS COST INCENTIVE MECHANISM

Sheet 4

(Continued)

C. GAS COST INCENTIVE MECHANISM (GCIM) METHODOLOGY (Continued)

6. (continued)

- d. Core gas sales will be used as a tool to reduce costs to core customers similar to other utilities and will be credited to actual gas commodity costs.
 - e. California Energy Hub (Hub) net revenues are included as a credit to the GCIM actual costs. On a monthly basis, the Hub net revenues are cleared from a separate Hub account and allocated to the PGA.
 - f. Commodity cost refunds credited to the PGA are credited to the actual cost of gas in the month during which SoCalGas receives the refund.
 - g. Surcharge adjustments to the core cost of gas are treated as an additional cost in the month during which SoCalGas is billed. If the surcharge occurs due to adjustments across more than one incentive mechanism cycle, the monthly actual cost of gas will be recalculated to reflect any GCIM impacts.
 - h. Any prospective refunds, surcharges, penalties, liabilities, or adjustments to purchases made during the term of the GCIM, specifically in conjunction with existing long-term contracts, shall be included as actual gas costs and are not subject to subsequent reasonableness review absent fraud or abuse.
 - i. Gains and losses from futures and over-the-counter financial transactions, including transaction costs will be recorded in the PGA, and included in GCIM actual commodity costs.
 - j. Pursuant to Preliminary Statement, Part VI, Description of Regulatory Accounts - Memorandum, the Blythe Operational Flow Requirement Memorandum Account (BOFRMA) will record charges associated with SoCalGas' purchasing and delivery of gas to sustain operational flows at Blythe. GCIM actual cost will be adjusted for charges or credits to the BOFRMA.
7. The Annual Storage Inventory target on November 1 is 70.0 Bcf of the physical gas supply, with an accepted variance of +5/-5 Bcf. If the November 1 target is not attained, deliveries must be made to insure that a minimum of 60 Bcf of actual physical gas in the core's inventory is reached by December 1. The January, February and March minimum month-end targets (equivalent to peak day minimums necessary for serving the core) must be met. Any deviation from these storage targets should be explained in SoCalGas' annual GCIM filing.

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 Regulatory Affairs

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PRELIMINARY STATEMENT
 PART VIII
GAS COST INCENTIVE MECHANISM

Sheet 5

(Continued)

C. GAS COST INCENTIVE MECHANISM (GCIM) METHODOLOGY (Continued)

8. Tolerance

To determine GCIM rewards or penalties, tolerance bands above or below the benchmark budget are used. Tolerance bands are calculated as a percentage of the monthly gas commodity portion of the benchmark budget and is added to or subtracted from the benchmark budget as "upper tolerance band" or "lower tolerance band" (sharing bands), respectively. The specific percentages are approved by the CPUC and may be redetermined in subsequent CPUC decisions (See Section 9).

9. Calculation of Rewards and Penalties Under GCIM

- a. On an annual basis, actual total purchased gas costs are compared to the annual benchmark budget to determine if a reward/savings or penalty applies.
- b. If actual total purchased gas costs for the incentive year are less than the annual benchmark budget, the difference constitutes a savings incentive to be shared between ratepayers and shareholders as defined by the Sharing Bands as follows:

Sharing Band	Ratepayer	Shareholder
0.0% -1.00%	100%	0%
1.00% - 5.00%	75%	25%
5.00% & Above	90%	10%

The shareholder reward will be capped at 1.5% of the actual annual gas commodity costs.

- c. If the actual total purchased gas costs are above the benchmark budget plus the upper tolerance band of 2%, then the difference constitutes a cost penalty, and the portion over this amount will be shared 50/50 between shareholders and ratepayers. If emergencies such as force majeure events (e.g. earthquakes and pipeline failures) cause the cost to be above benchmark, then ratepayers would absorb these incremental costs associated with that event.

D. BALANCING ACCOUNT TREATMENT OF REWARDS AND PENALTIES

Effective GCIM Year 9 (April 1, 2002 through March 31, 2003), SoCalGas will include the shareholder results of the GCIM from the most recent monthly report in the core monthly gas pricing advice letters submitted to the Energy Division, with copies to ORA. SoCalGas will maintain an interest bearing balancing account associated with shareholder rewards and penalties. On June 15 of each year, SoCalGas will file its annual GCIM application to the Commission describing, in detail, the results of the GCIM over the past year. ORA will conduct its annual audit and issue its monitoring and evaluation report by October 15 of each year. Any agreed upon adjustments in the shareholder incentive award or penalty for the past year will be reflected in SoCalGas' next core monthly gas pricing advice letter or as mutually agreed upon by SoCalGas and ORA.

(Continued)

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The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

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Table of Contents--Rate Schedules	36970-G,36971-G,36972-G
Table of Contents--List of Cities and Communities Served	33771-G
Table of Contents--List of Contracts and Deviations	33771-G
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Part II Summary of Rates and Charges	36937-G,36938-G,36939-G,36632-G,36940-G,36941-G 32491-G,32492-G,36109-G,36942-G,36943-G,36120-G,36121-G
Part III Cost Allocation and Revenue Requirement	27024-G,27025-G,27026-G,27027-G,36122-G
Part IV Income Tax Component of Contributions and Advances	36614-G,24354-G
Part V Description of Regulatory Accounts-Balancing	35874-G,34820-G,34371-G 34821-G,34822-G,34823-G,34824-G,34825-G,34826-G,34827-G,34682-G,35770-G,35874-G
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Part VII Description of Regulatory Accounts-Tracking	36022-G,34373-G,34374-G 34375-G,34376-G,34377-G,34378-G,34379-G,36023-G
Part VIII Gas Cost Incentive Mechanism (GCIM)	35876-G,35877-G,35878-G,36869-G 36870-G,35881-G
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Part X Global Settlement	32530-G,32531-G,32532-G,32533-G

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