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April 25, 2005

Advice No. 3493
(U 904 G)

Public Utilities Commission of the State of California

Subject: USE OF E3 AVOIDED COST METHODOLOGY PURSUANT TO D.05-04-024

Purpose

This filing requests the California Public Utilities Commission (Commission) approval of the updated avoided cost energy inputs used to forecast avoided energy costs for use in Standard Practice Manual (SPM) cost effectiveness tests to evaluate energy efficiency programs for 2006.

Background

On April 22, 2004, the Commission issued Rulemaking (R.) 04-04-025 to develop avoided costs in a consistent and coordinated manner across Commission proceedings. The Commission issued D.05-04-024 on April 7, 2005, in Rulemaking R.04-04-025 which adopted a report by Energy and Environmental Economics (E3) submitted on October 25, 2004, entitled *Methodology and Forecast of Long-Term Avoided Cost(s) for the Evaluation of California Energy Efficiency Programs* (Final Report). D.05-04-024 directs the energy utilities to use the E3 methodology with the appropriate updates of certain inputs for evaluating energy efficiency program proposals for program years 2006 through 2008.

As directed in D.05-04-024, a workshop was held on April 18, 2004, to identify the input data assumptions to be updated.

Proposed Updates

As a result of the workshop, SoCalGas proposes to update the E3 gas price forecast utilizing a 60-day average of NYMEX gas futures data (similar to that done in the Market Price Referent (MPR) gas forecast methodology). The 60-day sample of NYMEX data will extend back from April 7, 2005, the effective date of the decision. The proposed gas price forecast for the first five years is shown in Table 1.

Table 1: 60-Day Average of NYMEX Henry Hub Gas
Futures Contracts through 4/7/2005
(Nominal \$/MMBtu)

60-Day Average NYMEX Closing Prices (1/11/2005-4/7/2005)					
Month	Year				
	2006	2007	2008	2009	2010
January	7.81	7.31	6.87	6.49	6.19
February	7.79	7.28	6.85	6.47	6.17
March	7.61	7.09	6.65	6.28	5.99
April	6.56	6.15	5.76	5.43	5.15
May	6.42	6.01	5.64	5.31	5.04
June	6.44	6.03	5.66	5.34	5.07
July	6.47	6.05	5.69	5.36	5.09
August	6.50	6.07	5.71	5.39	5.12
September	6.48	6.05	5.69	5.37	5.12
October	6.50	6.07	5.71	5.40	5.15
November	6.81	6.36	5.98	5.68	5.39
December	7.09	6.64	6.25	5.96	5.64

The E3 models will also incorporate the same three non-confidential fundamentals forecasts (California Energy Commission, Energy Information Administration, and Southern California Gas) as were used in the MPR gas forecast model. For transparency purposes, SoCalGas will not utilize a private forecast from Cambridge Energy Research Associates, PIRA Energy Group, or Global Insight. The proposed forecast values after the first five years plus a transition period are shown in Table 2 below.

**Table 2: Long-run Fundamentals Gas Price Forecast
Average of Henry Hub Fundamentals Natural Gas Prices**

Row	Year	SoCal				Average
		CEC 4/8/2003	EIA 1/2005	Gas 4/2/04		
1	2006	\$ 4.06	\$ 5.34	\$ 5.06	\$ 4.82	
2	2007	\$ 4.31	\$ 4.93	\$ 5.16	\$ 4.80	
3	2008	\$ 4.46	\$ 4.57	\$ 5.12	\$ 4.72	
4	2009	\$ 4.67	\$ 4.55	\$ 5.04	\$ 4.75	
5	2010	\$ 4.85	\$ 4.51	\$ 5.02	\$ 4.80	
6	2011	\$ 5.04	\$ 4.62	\$ 5.00	\$ 4.89	
7	2012	\$ 5.24	\$ 4.87	\$ 4.98	\$ 5.03	
8	2013	\$ 5.46	\$ 5.13	\$ 4.96	\$ 5.18	
9	2014	\$ 5.69	\$ 5.49	\$ 5.10	\$ 5.43	
10	2015	\$ 5.93	\$ 5.81	\$ 5.25	\$ 5.66	
11	2016	\$ 6.18	\$ 5.85	\$ 5.39	\$ 5.81	
12	2017	\$ 6.39	\$ 5.98	\$ 5.55	\$ 5.97	
13	2018	\$ 6.71	\$ 6.32	\$ 5.72	\$ 6.25	
14	2019	\$ 6.99	\$ 6.76	\$ 5.89	\$ 6.55	
15	2020	\$ 7.27	\$ 7.21	\$ 5.96	\$ 6.81	
16	2021	\$ 7.57	\$ 7.58	\$ 6.15	\$ 7.10	
17	2022	\$ 7.90	\$ 7.84	\$ 6.34	\$ 7.36	
18	2023	\$ 8.17	\$ 8.10	\$ 6.54	\$ 7.60	
19	2024	\$ 8.47	\$ 8.45	\$ 6.75	\$ 7.89	
20	2025	\$ 8.77	\$ 8.85	\$ 6.96	\$ 8.19	
21	2026	\$ 9.06	\$ 9.10	\$ 7.16	\$ 8.44	
22	2027	\$ 9.36	\$ 9.42	\$ 7.36	\$ 8.71	
23	2028	\$ 9.65	\$ 9.73	\$ 7.56	\$ 8.98	
24	2029	\$ 9.95	\$ 10.04	\$ 7.77	\$ 9.25	
25	2030	\$ 10.24	\$ 10.36	\$ 7.97	\$ 9.52	

Sources: CEC price forecast from California Energy Commission Natural Gas Assessment, August 2003, Publication 100-03-006, Appendix E, converted to nominal dollars and adjusted for delivery prices. EIA Forecast from January 2005 Wellhead Gas Forecast (http://www.eia.doe.gov/oiaf/aeo/pdf/aeotab_14.pdf), adjusted to nominal dollars Using EIA Deflators, converted to Henry Hub using EIA Factor (10.8%), and converted from Mcf to MMBtu. SoCal Gas Forecasted Henry Hub Prices from Southern California Gas Company, 2004 California Gas Report Workpapers Table 1-6.

SoCalGas will use the same transition methodology from the futures data to the fundamentals data as E3 originally proposed. SoCalGas will also use NYMEX basis swap data to calculate the southern California border prices in the first two years as shown in Table 3.

Table 3: NYMEX Henry Hub – SoCal Border
Basis Differentials as of 4/7/2005

SoCal Gas	
Contract	7-Apr
Jan-06	-0.4975
Feb-06	-0.4975
Mar-06	-0.4975
Apr-06	-0.3025
May-06	-0.3025
Jun-06	-0.3025
Jul-06	-0.3025
Aug-06	-0.3025
Sep-06	-0.3025
Oct-06	-0.3025
Nov-06	-0.4325
Dec-06	-0.4325
Jan-07	-0.4325
Feb-07	-0.4325
Mar-07	-0.4325
Apr-07	-0.2600
May-07	-0.2600
Jun-07	-0.2600
Jul-07	-0.2600
Aug-07	-0.2600
Sep-07	-0.2600
Oct-07	-0.2600
Nov-07	-0.3800
Dec-07	-0.3800

The E3 avoided gas cost model with the updated gas inputs shown above will be posted at www.ethree.com as soon as practicable.

Effective Date

SoCalGas believes this filing is subject to Energy Division disposition and therefore respectfully requests that this filing become effective on May 25, 2005, which is 30 calendar days after the date filed.

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 of 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
Attention: 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 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.

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Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties in R.01-08-028 and R.04-04-025.

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Attachments

ATTACHMENT A

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