

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 20, 2008

Advice Letter 3812-A

Mr. Sid Newsom  
Regulatory Tariff Administration  
Southern California Gas Company – GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-4957

Subject: Supplemental – Establishment of the Noncore Storage  
Memorandum Account (NSMA)

Dear Mr. Newsom:

Advice Letter 3812-A is effective January 1, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher, Director  
Energy Division



Ken Deremer  
Director  
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January 29, 2008

Advice No. 3812-A  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Supplemental - Establishment of the Noncore Storage Memorandum Account (NSMA)**

In compliance with Ordering Paragraph (OP) 19 and 35 of Decision (D.) 07-12-019, dated December 6, 2007, Southern California Gas Company (SoCalGas) hereby submits for filing revisions to its Preliminary Statements, Part VI - Memorandum Accounts as shown on Attachment B.

**Purpose**

This filing replaces, in its entirety, Advice No. (AL) 3812 filed on December 31, 2007 requesting to establish the NSMA pursuant to OP 19 of D.07-12-019. This is in response to the protests to AL 3812 filed by the Division of Ratepayer Advocates and Southern California Generation Coalition on January 22, 2008.

**Background**

On December 6, 2007, the Commission issued D.07-12-019 approving and denying, in part, SoCalGas and SDG&E's proposals to implement a range of revisions to the natural gas operations and service offerings of SoCalGas and SDG&E, related to core operations, unbundled storage, and provisions for expansion of storage capacities, among other things. In compliance to OP 19 and 35, SoCalGas is filing this advice letter to establish the NSMA. Other tariff and regulatory account changes associated with D.07-12-019 have been filed in separate advice letters.

**Establishment of the NSMA**

Pursuant to OP 19 of D.07-12-019, SoCalGas is establishing the NSMA to record storage costs, including the unallocated scalar, and related revenues associated with SoCalGas' Unbundled Storage Program. The unallocated scalar was not previously allocated to the at-risk portion of the Unbundled Storage Program but 100% balanced in the Noncore Storage Balancing Account (NSBA) pursuant to D.00-04-060. SoCalGas plans to implement the NSMA on January 1, 2008 which provides a "clean" cut-off between the current Noncore Storage Balancing Account (NSBA) and the NSMA. The balance in the NSMA will be addressed in SoCalGas' upcoming Biennial Cost Allocation Proceeding

(BCAP) with respect to the appropriate shareholder percentage allocation and storage earnings cap. The NSBA will no longer record Unbundled Storage Program costs, including the unallocated scalar.

### **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. 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  
Attn: 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 Maria Salinas ([mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)) and to Honesto Gatchalian ([jnj@cpuc.ca.gov](mailto: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.

Attn: Sid Newsom  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No. (213) 244-4957  
E-mail: [snewsom@SempraUtilities.com](mailto:snewsom@SempraUtilities.com)

### **Effective Date**

SoCalGas believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. This filing is consistent with D.07-12-019 and therefore SoCalGas respectfully requests that this supplemental filing be approved on January 30, 2008, which is the same requested effective date as AL 3812.

### **Notice**

A copy of this advice letter is being sent to all parties listed on Attachment A, which includes the interested parties in A.06-08-026.

---

KEN DEREMER  
Director  
Tariffs and Regulatory Accounts

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904-G)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: snewsom@semprautilities.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3812-A

Subject of AL: Supplemental - Establishment of the Noncore Storage Memorandum Account

Keywords (choose from CPUC listing): Storage, Preliminary Statement, Memorandum Account

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.07-12-019

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: 1/30/08

No. of tariff sheets: 4

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: PS VI and TOCs

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: None

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

**CPUC, Energy Division**

**Attention: Tariff Unit**

**505 Van Ness Ave.**

**San Francisco, CA 94102**

**mas@cpuc.ca.gov and jnj@cpuc.ca.gov**

**Southern California Gas Company**

**Attention: Sid Newsom**

**555 West Fifth Street, GT14D6**

**Los Angeles, CA 90013-1011**

**snewsom@semprautilities.com**

<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT A**  
**Advice No. 3812-A**

**(See Attached Service Lists)**

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ATTACHMENT B  
Advice No. 3812-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 42898-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 1	Revised 42724-G Revised 42132-G
Original 42899-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, NONCORE STORAGE , MEMORANDUM ACCOUNT (NSMA), Sheet 1	Original 42725-G
Revised 42900-G Revised 42901-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 42897-G Revised 42727-G Revised 42140-G

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS  
DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS

Sheet 1

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

- PCB Expense Account (PCBEA)
- Research Development and Demonstration Expense Account (RDDEA)
- Curtailement Violation Penalty Account (CVPA)
- Economic Practicality Shortfall Memorandum Account (EPSMA)
- Catastrophic Event Memorandum Account (CEMA)
- Vernon Avoided Distribution Cost Memorandum Account (VADCMA)
- Vernon Rate Savings Memorandum Account (VRSMA)
- Vernon Negotiated Core Contract Memorandum Account (VNCCMA)
- Research Royalty Memorandum Account (RRMA)
- NGV Research Development & Demonstration Memorandum Account (RDDNGV)
- Intervenor Award Memorandum Account (IAMA)
- Z Factor Account (ZFA)
- Wheeler Ridge Firm Access Charge Memorandum Account (WRFACMA)
- Gas Industry Restructuring Memorandum Account (GIRMA)
- Self-Generation Program Memorandum Account (SGPMA)
- Baseline Memorandum Account (BMA)
- Blythe Operational Flow Requirement Memorandum Account (BOFRMA)
- Cost of Service Revenue Requirement Memorandum Account (COSRRMA)
- FERC Settlement Proceeds Memorandum Account (FSPMA)
- Interim Call Center Memorandum Account (ICCMA)
- Late Payment Charge Memorandum Account (LPCMA)
- San Diego Gas & Electric Storage Memorandum Account (SDGESMA)
- Gain/Loss On Sale Memorandum Account (GLOSMA)
- Affiliate Transfer Fee Account (ATFA)
- Firm Access Rights Memorandum Account (FARMA)
- Otay Mesa System Reliability Memorandum Account (OMSRMA)
- General Rate Case Revenue Requirements Memorandum Account (GRCRRMA)
- Noncore Storage Memorandum Account (NSMA)

N

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 3812-A  
 DECISION NO. 07-12-019

ISSUED BY  
**Lee Schavrien**  
 Senior Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Jan 29, 2008  
 EFFECTIVE Jan 1, 2008  
 RESOLUTION NO. \_\_\_\_\_

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS Sheet 1  
NONCORE STORAGE  
MEMORANDUM ACCOUNT (NSMA)

The NSMA is an interest bearing memorandum account that is recorded on the Utility's financial statements. The purpose of this account is to track, effective January 1, 2008, the costs and revenues associated with SoCalGas' Unbundled Storage Program pursuant to D.07-12-019, including unallocated scalar. These costs and revenues were previously subject to the Noncore Storage Balancing Account (NSBA) as described in Preliminary Statement, Part V – Balancing Accounts. The NSBA will no longer record unbundled storage program costs.

The Utility shall maintain the NSMA by making entries to the account at the end of each month, as follows:

- a. A debit entry equal to one-twelfth of the at-risk authorized non-gas costs allocated to unbundled storage service (i.e., \$21 million annually pursuant to D.00-04-060), less the allowance for F&U on net revenue, as applicable. SoCalGas shall also book, as appropriate, any additional storage costs that can be attributed specifically to the unbundled storage program;
- b. A debit entry equal to the difference between 100% of one-twelfth of the authorized fully scaled unbundled noncore storage revenue requirement and one-twelfth of the \$21 million at-risk unbundled storage level pursuant to D.00-04-060, less the allowance for F&U on net revenue, as applicable;
- c. A credit entry equal to all reservation and variable O&M charge revenues less (a) the allowance for F&U on net revenue, as applicable, and (b) the reservation charge revenues collected for subscribed unbundled storage service from expansion storage facilities;
- d. A debit entry equal to well incidents allocated to the unbundled storage programs; and
- e. 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 balance in the NSMA will be reviewed in SoCalGas' next Biennial Cost Allocation Proceeding (BCAP) in determining the appropriate shareholder percentage and earnings cap.

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 3812-A  
DECISION NO. 07-12-019

ISSUED BY  
**Lee Schavrien**  
Senior Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Jan 29, 2008  
EFFECTIVE Jan 1, 2008  
RESOLUTION NO. \_\_\_\_\_

TABLE OF CONTENTS

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.

<u>GENERAL</u>	<u>Cal. P.U.C. Sheet No.</u>
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Table of Contents--List of Cities and Communities Served .....	40149.1-G
Table of Contents--List of Contracts and Deviations .....	40149.1-G
Table of Contents--Rules .....	42169-G,41996-G
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PRELIMINARY STATEMENT

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Part V Balancing Accounts	
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California Alternate Rates for Energy Account (CAREA) .....	40872-G,40873-G
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(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVISE LETTER NO. 3812-A  
 DECISION NO. 07-12-019

ISSUED BY  
**Lee Schavrien**  
 Senior Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Jan 29, 2008  
 EFFECTIVE Jan 1, 2008  
 RESOLUTION NO. \_\_\_\_\_

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(Continued)

PRELIMINARY STATEMENT (Continued)

Part V Balancing Accounts (Continued)

Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA)	40884-G, 40885-G
Conservation Expense Account (CEA)	40886-G, 40887-G
Research Development and Demonstration Gas Surcharge Account (RDDGSA)	40888-G
Demand Side Management Balancing Account (DSMBA)	41152-G, 41153-G
Direct Assistance Program Balancing Account (DAPBA)	40890-G
California Solar Initiative Balancing Account (CSIBA)	41104-G
Integrated Transmission Balancing Account (ITBA)	42487-G

Part VI Memorandum Accounts

Description and Listing of Memorandum Accounts	42898-G
PCB Expense Account (PCBEA)	40893-G
Research Development and Demonstration Expense Account (RDDEA)	40894-G
Curtailed Violation Penalty Account (CVPA)	40895-G
Economic Practicality Shortfall Memorandum Account (EPSMA)	40896-G
Catastrophic Event Memorandum Account (CEMA)	40897-G, 40898-G
Vernon Avoided Distribution Cost Memorandum Account (VADCMA)	40899-G
Vernon Rate Savings Memorandum Account (VRSMA)	40900-G
Vernon Negotiated Core Contract Memorandum Account (VNCCMA)	40901-G
Research Royalty Memorandum Account (RRMA)	40902-G
NGV Research Development & Demonstration Memorandum Account (RDDNGV)	40903-G
Intervenor Award Memorandum Account (IAMA)	40904-G
Z Factor Account (ZFA)	40905-G
Wheeler Ridge Firm Access Charge Memorandum Account (WRFACMA)	40906-G
Gas Industry Restructuring Memorandum Account (GIRMA)	40907-G, 40908-G, 40909-G
Self-Generation Program Memorandum Account (SGPMA)	41105-G
Baseline Memorandum Account (BMA)	40911-G
Blythe Operational Flow Requirement Memorandum Account (BOFRMA)	41830-G
Cost of Service Revenue Requirement Memorandum Account (COSRRMA)	40913-G
FERC Settlement Proceeds Memorandum Account (FSPMA)	40914-G
Interim Call Center Memorandum Account (ICCMA)	40915-G
Late Payment Charge Memorandum Account (LPCMA)	40916-G
San Diego Gas & Electric Storage Memorandum Account (SDGESMA)	40917-G
Gain/Loss on Sale Memorandum Account (GLOSMA)	42133-G
Affiliate Transfer Fee Account (ATFA)	40919-G
Firm Access Rights Memorandum Account (FARMA)	41493-G
Otay Mesa System Reliability Memorandum Account (OMSRMA)	42004-G
General Rate Case Revenue Requirements Memorandum Account (GRCRRMA)	42721-G
Noncore Storage Memorandum Account (NSMA)	42899-G

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 3812-A  
 DECISION NO. 07-12-019

ISSUED BY  
**Lee Schavrien**  
 Senior Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 DATE FILED Jan 29, 2008  
 EFFECTIVE Jan 1, 2008  
 RESOLUTION NO. \_\_\_\_\_