#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



December 4, 2008

**Advice Letter 3882** 

Ken Deremer Director Tariffs & Regulatory Accounts 8330 Century Park Court CP32C San Diego, CA 92123-1548

Subject: Establishment of the Southwest Gas Exchange Fees Memorandum Account

Dear Mr. Deremer:

Advice Letter 3882 is denied by Resolution G-3428.

Sincerely,

Kenneth Lewis, Acting Director

**Energy Division** 





July 16, 2008

Ken Deremer
Director
Tariffs & Regulatory Accounts

8330 Century Park Court CP32C San Diego, CA 92123-1548 Tel: 858.654.1756 Fax: 858.654.1788 KDeremer@SempraUtilities.com

Advice No. 3882 (U 904 G)

Public Utilities Commission of the State of California

Subject: Establishment of the Southwest Gas Exchange Fees Memorandum Account

#### <u>Purpose</u>

Southern California Gas Company (SoCalGas) requests California Public Utilities Commission (Commission) approval to revise its Preliminary Statement, Part VI - Memorandum Accounts as shown on Attachment B, in order to establish the Southwest Gas Exchange Fees Memorandum Account (SGEFMA). SoCalGas is requesting the protest period be shortened to 10 days and the Commission review and approve SoCalGas' request as expeditiously as possible, to be able to continue service to Southwest Gas Corporation (SWG) after July 31, 2008.

#### **Background**

SoCalGas has provided wholesale service to SWG for the last 15 years under the California Wholesale Gas Transportation and Storage Services Agreement (SWG Agreement). SoCalGas' service to SWG is made possible, in part, by the Southwest Exchange Gas Delivery Agreement (SEGDA) between SoCalGas and Pacific Gas and Electric Company (PG&E) because a portion of SWG's customers are situated on PG&E's taps.

The Commission approved the existing SWG Agreement and SEGDA in Decision (D.) 93-07-052. The initial 15-year terms of both the SWG Agreement and SEGDA expire on July 31, 2008. SWG would like to retain SoCalGas as its sole service provider, and SoCalGas, SWG, and PG&E are negotiating a new SWG Agreement and SEGDA to facilitate such service in the future. The parties plan to file such agreements for Commission approval via an application in the near future.

#### **Establishment of the SGEFMA Memorandum Account**

PG&E is willing to continue to provide exchange service until the Commission acts on the new SWG Agreement and SEGDA that are currently being negotiated, but only if the existing SEGDA exchange fee is increased from \$0.25/Dth to \$0.4172/Dth.

The SGEFMA is an interest bearing balancing account recorded on SoCalGas' financial statements. Effective August 1, 2008, the SGEFMA will record the difference between costs based on the original SEGDA exchange fee of \$0.25/Dth and the revised SEGDA exchange fee of \$0.4172/Dth.

SoCalGas anticipates filing an application for a new wholesale agreement with SWG and a related exchange agreement prior to the fourth quarter of 2008. The disposition of the SGEFMA balance will be determined in that proceeding or such other proceeding as the Commission deems appropriate.

#### **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 10 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 (<a href="mas@cpuc.ca.gov">mas@cpuc.ca.gov</a>) and to Honesto Gatchalian (<a href="mail@cpuc.ca.gov">ini@cpuc.ca.gov</a>) of the Energy Division. A copy of the protest should also be sent via both e-mail <a href="mail@and">and</a> 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

#### **Effective Date**

SoCalGas believes that this Advice Letter should be classified as Tier 3 and, as such, requires a resolution to be issued by the Commission. SoCalGas respectfully requests that the Resolution be approved at the September 4, 2008 CPUC meeting or on such other date as the Commission may direct by resolution.

#### **Notice**

A copy of this advice letter is being sent to the parties listed on Attachment A.

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:	Contact Person:_	Sid Newsom		
☐ ELC ☐ GAS	Phone #: (213) _244-2846			
☐ PLC ☐ HEAT ☐ WATER	E-mail: snewsom@semprautilities.com			
EXPLANATION OF UTILITY TY	(PE (Date Filed/ Received Stamp by CPUC)			
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat V	VATER = Water			
Advice Letter (AL) #: 3882				
Subject of AL: Establishment of Southwest Gas Exchange Fees Memorandum Account				
Keywords (choose from CPUC listing): Memorandum Account				
AL filing type:  Monthly  Quarterly  Annual  One-Time  Other				
AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:				
Does AL replace a withdrawn or rejected AL? If so, identify the prior ALNo				
_		ithdrawn or rejected AL¹:N/A		
	•	•		
Does AL request confidential treatme	ent? If so, provide e	explanation: No		
1	, <sub>L</sub>			
Resolution Required?   Yes   No		Tier Designation: 1 1 2 3		
Requested effective date: 9/4/08		No. of tariff sheets: <u>4</u>		
Estimated system annual revenue eff	fect: (%):None	<u>e</u>		
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: Preliminary Statement Part VI, 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		Southern California Gas Company Attention: Sid Newsom		
505 Van Ness Ave.		555 West Fifth Street, GT14D6		
San Francisco, CA 94102		os Angeles, CA 90013-1011		
mas@cpuc.ca.gov and jnj@cpuc.ca.gov	, S	newsom@semprautilities.com		

 $<sup>^{\</sup>mbox{\tiny 1}}$  Discuss in AL if more space is needed.

## **ATTACHMENT A**

Advice No. 3882

(See Attached Service List)

Aglet Consumer Alliance James Weil jweil@aglet.org

Alcantar & Kahl LLP Annie Stange sas@a-klaw.com

Ancillary Services Coalition Terry Rich TRich@ascoalition.com

Beta Consulting John Burkholder burkee@cts.com

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CPUC - DRA
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jnm@cpuc.ca.gov

City of Anaheim Ben Nakayama Public Utilities Dept. P. O. Box 3222 Anaheim, CA 92803

City of Burbank Fred Fletcher/Ronald Davis 164 West Magnolia Blvd., Box 631 Burbank, CA 91503-0631

City of Los Angeles City Attorney 200 North Main Street, 800 Los Angeles, CA 90012

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Daniel Garcia
dgarcia@ci.vernon.ca.us

Alcantar & Kahl Kari Harteloo klc@a-klaw.com

Jo Maxwell jomaxwell@ascoalition.com

**Ancillary Services Coalition** 

BP Amoco, Reg. Affairs Marianne Jones 501 West Lake Park Blvd. Houston, TX 77079

Consumer Affairs Branch 505 Van Ness Ave., #2003 San Francisco, CA 94102

CPUC - DRA Galen Dunham gsd@cpuc.ca.gov

**CPUC** 

California Energy Market Lulu Weinzimer Iuluw@newsdata.com

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City of Riverside Joanne Snowden jsnowden@riversideca.gov

Commerce Energy Glenn Kinser

gkinser@commerceenergy.com

**County of Los Angeles Commerce Energy** Crossborder Energy Lynelle Lund Stephen Crouch Tom Beach Ilund@commerceenergy.com 1100 N. Eastern Ave., Room 300 tomb@crossborderenergy.com Los Angeles, CA 90063 **Culver City Utilities** DGS **Davis Wright Tremaine, LLP Heustace Lewis Henry Nanjo** Edward W. O'Neill Heustace.Lewis@culvercity.org Henry.Nanjo@dgs.ca.gov 505 Montgomery Street, Ste 800 San Francisco, CA 94111 Davis, Wright, Tremaine **Dept. of General Services** Douglass & Liddell Judy Pau **Celia Torres** Dan Douglass judypau@dwt.com celia.torres@dgs.ca.gov douglass@energyattorney.com **Douglass & Liddell** Downey, Brand, Seymour & Rohwer Downey, Brand, Seymour & Rohwer Donald C. Liddell **Ann Trowbridge** Dan Carroll liddell@energyattorney.com atrowbridge@downeybrand.com dcarroll@downeybrand.com **Gas Purchasing Gas Transmission Northwest Dynegy** Corporation Joseph M. Paul BC Gas Utility Ltd. Bevin Hong impa@dynegy.com 16705 Fraser Highway Bevin Hong@transcanada.com Surrey, British Columbia, V3S 2X7 **General Services Administration** Goodin, MacBride, Squeri, Ritchie & Goodin, MacBride, Squeri, Ritchie & Day, LLP Day, LLP **Facilities Management (9PM-FT)** J. H. Patrick James D. Squeri 450 Golden Gate Ave. hpatrick@gmssr.com jsqueri@gmssr.com San Francisco, CA 94102-3611 **Hanna & Morton Imperial Irrigation District** JBS Energy Norman A. Pedersen, Esq. K. S. Noller Jeff Nahigian npedersen@hanmor.com P. O. Box 937 jeff@jbsenergy.com Imperial, CA 92251 Jeffer, Mangels, Butler & Marmaro **Kern River Gas Transmission Company LADWP** 2 Embarcaero Center, 5th Floor Janie Nielsen Nevenka Ubavich Janie.Nielsen@KernRiverGas.com San Francisco, CA 94111 nevenka.ubavich@ladwp.com **LADWP** Law Offices of Diane I. Fellman Law Offices of William H. Booth

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TURN

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Colette B. Mehle

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**Western Manufactured Housing Communities Assoc.** 

Sheila Day

sheila@wma.org

### ATTACHMENT B Advice No. 3882

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 43590-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 1	Revised 43307-G*
Original 43591-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, SOUTHWEST GAS EXCHANGE FEES MEMORANDUM ACCOUNT, (SGEFMA), Sheet 1	
Revised 43592-G Revised 43593-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 43407-G Revised 43412-G

Revised

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

43590-G 43307-G\*\*\*

LOS ANGELES, CALIFORNIA CANCELING Revised

#### 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)

Curtailment 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)

G-PAL Memorandum Account (GPMA)

Long Beach Storage Memorandum Account (LBSMA)

Southwest Gas Storage Memorandum Account (SGSMA)

Southwest Gas Exchange Fees Memorandum Account (SGEFMA)

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Senior Vice President Regulatory Affairs

(TO BE INSERTED BY UTILITY) 3882 ADVICE LETTER NO. DECISION NO.

ISSUED BY Lee Schavrien

(TO BE INSERTED BY CAL. PUC)

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Jul 16, 2008 DATE FILED **EFFECTIVE** RESOLUTION NO.

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Original

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

43591-G

LOS ANGELES, CALIFORNIA CANCELING

# PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS SOUTHWEST GAS EXCHANGE FEES MEMORANDUM ACCOUNT (SGEFMA)

Sheet 1

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#### 1. <u>Purpose</u>

The SGEFMA is an interest bearing balancing account recorded on SoCalGas' financial statements. Effective August 1, 2008, the SGEFMA will record the difference between costs based on the original exchange fee of \$0.25/Dth in the Southwest Gas Exchange Gas Delivery Agreement (SEGDA) authorized in Decision (D.) 93-07-052 and the revised SEGDA exchange fee of \$0.4172/Dth.

#### 2. Applicability

The SGEFMA shall apply to SoCalGas' wholesale customer, Southwest Gas Corporation.

#### 3. Rates

The balance in the SGEFMA will be included in gas rates upon Commission approval.

#### 4. Accounting Procedures

SoCalGas maintains this account by making monthly entries as follows:

- A debit entry to record exchange fees based on the revised SEGDA exchange fee of \$0.4172/Dth;
- A credit entry to record exchange fees based on the original SEGDA exchange fee of \$0.25/Dth; and
- c) An entry equal to interest on the average of the balance in the account during the month, calculated in the manner described in Preliminary Statement, Part I, J.

#### 5. Disposition

SoCalGas anticipates filing an application for a new wholesale agreement with Southwest Gas and a related exchange agreement by the fourth quarter of 2008. The disposition of the SGEFMA balance will be determined in that proceeding or such other proceeding as the Commission deems appropriate.

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 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} \quad \underline{ Jul~16,~2008} \\ \end{array}$ 

EFFECTIVE \_\_\_\_\_\_RESOLUTION NO.

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#### LOS ANGELES, CALIFORNIA CANCELING

#### 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>	Cal. P.U.C. Sheet No.
Title Page	40864-G
Table of ContentsGeneral and Preliminary Statement	
Table of ContentsService Area Maps and Descriptions	
Table of ContentsRate Schedules	
Table of ContentsList of Cities and Communities Served	
Table of ContentsList of Contracts and Deviations	
Table of ContentsRules	43402-G,43403-G
Table of ContentsSample Forms	G,43404-G,43045-G,43406-G
PRELIMINARY STATEMENT	
Part I General Service Information	G,24333-G,24334-G,24749-G
Part II Summary of Rates and Charges 43561-G,43562-G,43563-0	G,43564-G,43141-G,43300-G
43565-G,43301-G,43302-G,43303-G,43534-0	G,43535-G,42635-G,42636-G
Part III Cost Allocation and Revenue Requirement 27024-G,37920-0	G,27026-G,27027-G,42637-G
Part IV Income Tax Component of Contributions and Advances	43036-G,24354-G
Part V Balancing Accounts	
Description and Listing of Balancing Accounts	42240-G
Purchased Gas Account (PGA)	
Core Fixed Cost Account (CFCA)	41658-G
Noncore Fixed Cost Account (NFCA)	43305-G
Enhanced Oil Recovery Account (EORA)	40870-G
Noncore Storage Balancing Account (NSBA)	43306-G
California Alternate Rates for Energy Account (CAREA)	40872-G,40873-G
Brokerage Fee Account (BFA)	
Hazardous Substance Cost Recovery Account (HSCRA)	
Natural Gas Vehicle Account (NGVA)	
El Paso Turned-Back Capacity Balancing Account (EPTCBA)	
Gas Cost Rewards and Penalties Account (GCRPA)	
Pension Balancing Account (PBA)	40882-G,40883-G

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(TO BE INSERTED BY UTILITY) 3882 ADVICE LETTER NO. DECISION NO.

ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Jul 16, 2008 DATE FILED **EFFECTIVE** RESOLUTION NO.

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#### 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)
Research Development and Demonstration Gas Surcharge Account (RDDGSA)
Demand Side Management Balancing Account (DSMBA)
Direct Assistance Program Balancing Account (DAPBA)
California Solar Initiative Balancing Account (CSIBA)
Integrated Transmission Balancing Account (ITBA)
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Part VI Memorandum Accounts
Description and Listing of Memorandum Accounts
PCB Expense Account (PCBEA)
Research Development and Demonstration Expense Account (RDDEA)
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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) 40903-G
Intervenor Award Memorandum Account (IAMA)
Z Factor Account (ZFA) 40905-G
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)
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ISSUED BY
Lee Schavrien
Senior Vice President

Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & \underline{Jul~16,~2008} \\ \text{EFFECTIVE} \end{array}$ 

RESOLUTION NO.

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