

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 10, 2010

Advice Letter 4019-A

Rasha Prince, Director
Regulatory Affairs
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

**Subject: Supplemental – Establishment of the Wildfire Expense
Memorandum Account (WEMA)**

Dear Ms. Prince:

Advice Letter 4019-A is effective July 29, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
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August 6, 2010

Advice No. 4019-A
(U 904 G)

Public Utilities Commission of the State of California

Subject: Supplemental - Establishment of the Wildfire Expense Memorandum Account (WEMA)

Southern California Gas Company (SoCalGas) hereby submits for filing revisions to its Preliminary Statement Part VI, Memorandum Accounts, applicable throughout its service territory, as shown on Attachment B.

Purpose

This supplemental filing complies with Ordering Paragraph (OP) 2 of Resolution E-4311 which orders SoCalGas to replace in its entirety Advice No. 4019 filed on September 22, 2009, and establish a Wildfire Expense Memorandum Account (WEMA) with the modifications as described in Resolution E-4311 and specified in the Appendix thereto.

Background

On August 31, 2009, SoCalGas, along with San Diego Gas & Electric Company, Southern California Edison Company and Pacific Gas and Electric Company (Utilities) filed Joint Application (A.) 09-08-020, requesting approval to establish a Wildfire Expense Balancing Account (WEBA) to enable the Utilities to recover primarily the cost of uninsured wildfire claims to the extent that such claims would have been covered by insurance policies the Utilities historically have been able to purchase. SoCalGas seeks to establish the WEMA to record these same types of costs prior to a final decision in A. 09-08-020 and the establishment of the WEBA, should any costs be incurred.

In Resolution E-4311, issued on July 29, 2010, the Commission approved, with certain modifications, the Utilities' proposals to establish WEMAs. The Commission noted that the recovery of costs recorded in the WEMAs is dependent on a Commission decision in A.09-08-020.¹ The Commission also required that: (1) the electric Utilities' WEMA tariffs include a credit entry for any wildfire cost recovered through revenues authorized by the

¹ Resolution E-4311 at 6.

Federal Energy Regulatory Commission, and (2) interest on WEMA balances shall accrue at the three-month commercial paper rate and shall not include incremental debt/equity costs.²

Wildfire Expense Memorandum Account

Consistent with the Utilities' request in A.09-08-020 and the modifications adopted in Resolution E-4311, SoCalGas proposes a revised WEMA tariff to record for future recovery wildfire-related costs including: (1) payments to satisfy wildfire claims³, including any co-insurance and deductible expense paid by the Utilities, but excluding costs already authorized for recovery in rates; (2) outside legal expenses incurred in the defense of wildfire claims; and (3) increases or decreases in wildfire insurance premiums from amounts authorized in the General Rate Case (GRC) or other applicable proceeding. Insurance proceeds, as well as any payments received from third parties, will be credited to the WEMA as they are received. In accordance with Resolution E-4311, this WEMA tariff includes a special disposition section that links the recovery of any costs recorded in the WEMA to the Commission's decision in A.09-08-020.

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 which is August 26, 2010. 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 Maria Salinas (mas@cpuc.ca.gov) and Honesto Gatchalian (inj@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

² Resolution E-4311 at 7.

³ Wildfire claims means amounts paid by SoCalGas to a third party in respect of a claim by such third party for damage or loss resulting from a wildfire, including claims by a governmental entity for the reimbursement of fire suppression costs, damages to environmental resources and other governmental claims against SoCalGas arising from a wildfire.

Effective Date

OP 2 of Resolution E-4311 also orders SoCalGas to designate this as Tier1 and be made effective on July 29, 2010, the date of the Resolution, subject to Energy Division's review for compliance with the Resolution.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties to A. 09-08-020.

Rasha Prince
Director – Regulatory Affairs

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) #: 4019-A

Subject of AL: Establishment of Wildfire Expense Memorandum Account (WEMA)

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

AL filing type: Monthly Quarterly Annual One-Time Other _____

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

E-4311

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 AL¹: N/A

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 7/29/10

No. of tariff sheets: 5

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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 Statements Part VI and TOCs

Service affected and changes proposed¹: 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 Avenue

San Francisco, CA 94102

jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

Southern California Gas Company

Attention: Sid Newsom

555 West Fifth Street, ML GT14D6

Los Angeles, CA 90013-4957

snewsom@semprautilities.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A
Advice No. 4019-A

(See Attached Service Lists)

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ATTACHMENT B
Advice No. 4019-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 46335-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 1	Revised 45022-G Revised 44983-G
Original 46336-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, WILDFIRE EXPENSE MEMORANDUM ACCOUNT (WEMA)	Original 45023-G
Revised 46337-G Revised 46338-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 46312-G Revised 45025-G Revised 46089-G
Revised 46339-G	TABLE OF CONTENTS	Revised 45026-G Revised 46096-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)
- Late Payment Charge Memorandum Account (LPCMA)
- Gain/Loss On Sale Memorandum Account (GLOSMA)
- Affiliate Transfer Fee Account (ATFA)
- Firm Access and Storage Rights Memorandum Account (FASRMA)
- Otay Mesa System Reliability Memorandum Account (OMSRMA)
- General Rate Case Revenue Requirements Memorandum Account (GRCRRMA)
- 2009-2011 Energy Efficiency Memorandum Account (EEMA)
- System Reliability Memorandum Account (SRMA)
- Fire Hazard Prevention Memorandum Account (FHPMA)
- Wildfire Expense Memorandum Account (WEMA)

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4019-A
 DECISION NO.

ISSUED BY
Lee Schavrien
 Senior Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Aug 6, 2010
 EFFECTIVE Jul 29, 2010
 RESOLUTION NO. E-4311

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS
WILDFIRE EXPENSE MEMORANDUM ACCOUNT (WEMA)

1. Purpose

The WEMA is an interim ratemaking mechanism until such time as the Commission authorizes the establishment of the Wildfire Expense Balancing Account (WEBA) as proposed in A.09-08-020. The purpose of the WEMA is to record all costs of third party claims paid by SoCalGas resulting from wildfires that would have been covered by insurance, as well as costs that would not have been incurred by SoCalGas if insurance were available, that are not currently authorized in SoCalGas' General Rate Case (GRC) or any other proceeding including: (1) payments to satisfy wildfire claims, including any deductibles, co-insurance and other insurance expense paid by the Utilities; and (2) outside legal costs incurred in the defense of wildfire claims. Related insurance proceeds, as well as any payments received from third parties, will be credited to the WEMA as they are received.

2. Applicability

This account shall apply to all gas customers.

3. Rates

See Disposition Section.

4. Accounting Procedures

SoCalGas shall maintain the WEMA by recording entries at the end of each month as follows:

- a) A debit entry equal to payments to satisfy wildfire claims, including any deductibles, co-insurance and other incremental insurance expense paid by SoCalGas that are not authorized as part of SoCalGas' GRC or any other proceeding;
- b) A debit entry equal to incremental outside legal costs incurred by SoCalGas in the defense of wildfire claims;
- c) A credit entry each month equal to any reimbursement by insurance companies (i.e. proceeds) or other third parties related to costs recorded in this account; and
- d) An entry equal to the 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

The disposition of any amounts recorded in the WEMA shall be established by a Commission decision in A.09-08-020.

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 4019-A
DECISION NO.

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ISSUED BY

Lee Schavrien
Senior Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

DATE FILED Aug 6, 2010
EFFECTIVE Jul 29, 2010
RESOLUTION NO. E-4311

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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--List of Cities and Communities Served	45168-G
Table of Contents--List of Contracts and Deviations	45168-G
Table of Contents--Rules	46064-G,46065-G
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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4019-A
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ISSUED BY
Lee Schavrien
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 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Aug 6, 2010
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 RESOLUTION NO. E-4311

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PRELIMINARY STATEMENT (Continued)

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Vernon Rate Savings Memorandum Account (VRSMA)	40900-G
Vernon Negotiated Core Contract Memorandum Account (VNCCMA)	40901-G
Research Royalty Memorandum Account (RRMA)	43698-G
Intervenor Award Memorandum Account (IAMA)	40904-G
Z Factor Account (ZFA)	40905-G
Self-Generation Program Memorandum Account (SGPMA)	41105-G
Blythe Operational Flow Requirement Memorandum Account (BOFRMA)	45282-G,45283-G
FERC Settlement Proceeds Memorandum Account (FSPMA)	45756-G
Gain/Loss on Sale Memorandum Account (GLOSMA)	42133-G
Affiliate Transfer Fee Account (ATFA)	40919-G
Firm Access and Storage Rights Memorandum Account (FASRMA)	45284-G
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System Reliability Memorandum Account (SRMA)	45285-G
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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4019-A
 DECISION NO.

ISSUED BY
Lee Schavrien
 Senior Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Aug 6, 2010
 EFFECTIVE Jul 29, 2010
 RESOLUTION NO. E-4311

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(Continued)

PRELIMINARY STATEMENT (Continued)

Part VI Memorandum Accounts (Continued)

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4019-A
 DECISION NO.

ISSUED BY
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