PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

April 13, 2011



Advice Letter 4217

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

Subject: Storage Adjustment Pursuant to BCAP Phase 1 D.08-12-020

Dear Ms. Prince:

Advice Letter 4217 is effective April 1, 2011.

Sincerely,

Julie A. Fitch, Director Energy Division

Jen A. Jes

Rasha Prince Director Regulatory Affairs



555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011 Tel: 213.244.5141 Fax: 213.244.4957 RPrince @semprautilities.com

March 1, 2011

Advice No. 4217 (U 904 G)

Public Utilities Commission of the State of California

Subject: Storage Adjustment Pursuant to BCAP Phase 1 Decision (D.)08-12-020

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

Purpose

This filing seeks approval of the California Public Utilities Commission (Commission) to:
1) postpone an April 1, 2011 rate change to reflect changes in storage allocations pursuant to the 2009 BCAP D.08-12-020 until January 1, 2012, and 2) revise the Core Fixed Cost Account (CFCA) and Noncore Storage Balancing Account (NSBA) effective April 1, 2011.

Background

Pursuant to D.08-12-020, SoCalGas was authorized to adjust its overall storage inventory, core storage inventory and injection rights over a four-year period beginning in 2010. To avoid a minimal rate change on April 1, 2010, the rate change for the initial year's storage allocations were reflected in rates effective January 1, 2010 in connection with SoCalGas' consolidated advice letter filing. The January 2011 update, however, continued to assume total inventories of 133.1 Bcf, 80 Bcf of which belonged to the core. It also assumed 373.8 MMcfd of core injection rights. Pursuant to D.08-12-020, the core's storage in storage year 2011 is increased to 81 Bcf, out of a total system inventory of 134.1 Bcf, and there is a proportional increase in core's injection rights to 378.5 MMcfd.¹

In order to avoid a rate change involving miniscule rate impacts, SoCalGas proposes to reflect these new allocations in the next annual transportation rate change for rates effective January 1, 2012. In addition, to ensure that storage costs are allocated in a manner consistent with D.08-12-020, SoCalGas plans to record adjustments to its CFCA and NSBA in the interim period of April through December 2011. SoCalGas estimates the adjustment to be only about \$255,000 annually.

¹ Pursuant to D.08-12-020, Attachment A, paragraphs 5 and 7.

Requested Tariff Revisions

CFCA

The CFCA is revised to include an adjustment for costs associated with increases in core storage inventory and corresponding storage injection rights consistent with D.08-12-020.

NSBA

The NSBA is revised to include an adjustment for costs associated with changes in storage inventory and injection rights allocated to SoCalGas' Unbundled Storage Program. These adjustments will be used in determining storage earnings subject to the NSBA sharing mechanism.

Revenue Requirement Impact by Class of Service

	Applicable	Net M\$
Class of Service	Rate Schedules	Increase/(Decrease)
Core	GR, GS, GM, GO-AC,	
	G-NGVR, GL, G-10, G-AC,	
	G-EN, G-NGV	\$255
Noncore	GT-F, GT-I, GT-TLS	(\$6)
Wholesale and		
International	GT-TLS	(\$19)
Unbundled Storage	G-BSS, G-LTS, G-AUC, G-TE	BS (\$230)
TOTAL		

Included in this filing is Attachment C, Summary of Natural Gas Rate Transportation Revenues.

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 received within 20 days of the date this advice letter was filed with the Commission which is March 21, 2011. 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 (jnj@cpuc.ca.gov) of the Energy Division. A copy of the protest shall 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

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. SoCalGas respectfully requests that it be made effective on or after April 1, 2011 which is more than 30 days after the date filed.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties in the 2009 BCAP, A.08-02-001.

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 904G)								
cility type: Contact Person: <u>Sid Newsom</u>								
☐ ELC ☐ GAS	Phone #: (213) 244-2846							
☐ PLC ☐ HEAT ☐ WATER	E-mail: SNewsom@semprautilities.com							
EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)								
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water								
Advice Letter (AL) #: 4217								
Subject of AL: Storage Adjustment Pr	— ursuant to BCAP I	Phase 1 D.08-12-020						
Keywords (choose from CPUC listing)	: Storage							
AL filing type: Monthly Quarter	rly 🗌 Annual 🛛 C	ne-Time Other						
If AL filed in compliance with a Comp D.08-12-020	nission order, indi	cate relevant Decision/Resolution #:						
	ted AL? If so, ider	ntify the prior AL <u>No</u>						
Summarize differences between the A	L and the prior wi	ithdrawn or rejected AL¹: <u>N/A</u>						
Does AL request confidential treatment	nt? If so, provide e	explanation: No						
Resolution Required? \square Yes \boxtimes No		Tier Designation: 1 2 3						
Requested effective date: 4/1/11		No. of tariff sheets: <u>5</u>						
Estimated system annual revenue eff	ect: (%):							
Estimated system average rate effect	(%):							
When rates are affected by AL, includ	le attachment in A	L showing average rate effects on customer						
classes (residential, small commercia	l, large C/I, agricu	ıltural, lighting).						
Tariff schedules affected: <u>CFCA, NSE</u>	BA and TOCs							
Service affected and changes proposed ¹ : NA								
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		Southern California Gas Company						
Attention: Tariff Unit		Attention: Sid Newsom						
505 Van Ness Ave., San Francisco, CA 94102		555 West 5 th Street, GT14D6 Los Angeles, CA 90013-1011						
mas@cpuc.ca.gov and jnj@cpuc.ca.gov SNewsom@semprautilities.com								

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

ATTACHMENT A

Advice No. 4217

(See Attached Service Lists)

Alcantar & Kahl Seema Srinivasan sls@a-klaw.com

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ATTACHMENT B Advice No. 4217

Cal. P.U.C. Sheet No.				
Revised 46960-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, CORE FIXED	Revised 46677-G*		
Revised 46961-G	COST ACCOUNT (CFCA), Sheet 1 PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, CORE FIXED COST ACCOUNT (CFCA), Sheet 2	Revised 46678-G*		
Revised 46962-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NONCORE STORAGE BALANCING ACCOUNT (NSBA), Sheet 1	Revised 44191-G		
Revised 46963-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NONCORE STORAGE BALANCING ACCOUNT (NSBA), Sheet 2	Original 44192-G		
Revised 46964-G	TABLE OF CONTENTS	Revised 46959-G		

LOS ANGELES, CALIFORNIA CANCELING

46677-G*

PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS CORE FIXED COST ACCOUNT (CFCA)

Sheet 1

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1. Purpose

The CFCA is an interest bearing balancing account recorded on SoCalGas' financial statements. The purpose of this account is to balance the difference between the authorized margin, (excluding the transmission revenue requirements and firm access rights (FAR) revenue requirement) and other nongas costs as detailed below, including administrative costs and uncollectible deferred billings associated with the payment deferral plan pursuant to Resolution E-4065, funding of SoCalGas' Gas Assistance Fund (GAF) program pursuant to Advice No. 4168, and storage costs associated with the allocation of storage adopted in D.08-12-020 that are not currently reflected in current rates, allocated to the core market with revenues intended to recover these costs. Pursuant to Resolution G-3452, the CFCA will be credited for the increased revenues from the 1% surcharge in franchise fees charged to core customers in the City of Huntington Beach until the system-wide franchise fee factor is updated in SoCalGas' next General Rate Case. Pursuant to Advice No. 3963, SoCalGas establishes a separate subaccount in the CFCA to track authorized funding by the CPUC and related funds actually used in providing eligible customers with assistance in paying their bills in connection with SoCalGas' Gas Assistance Fund (GAF) program.

2. Applicability

The CFCA shall apply to all core gas customers.

3. Rates

The projected year-end CFCA balance will be applied to core gas transportation rates.

4. Accounting Procedures

SoCalGas shall maintain the CFCA by recording entries at the end of each month, net of FF&U, as follows:

- a. A debit entry equal to one-twelfth of the authorized margin;
- b. A debit entry equal to the recorded cost of the core portion of company-use fuel (excluding transmission and load balancing company-use fuel);
- c. A debit entry equal to the recorded cost for the core portion of unaccounted for gas;
- d. A debit entry equal to the recorded cost for the core portion of well incidents and surface leaks;
- e. A debit entry equal to incremental administrative costs and any amounts written off as uncollectible associated with the payment deferral plan related to core customers;
- f. A debit entry equal to the actual funds used, up to amounts authorized by the Commission, in providing eligible customers with assistance in paying their bills in connection with SoCalGas' Gas Assistance Fund (GAF) program;
- g. An adjustment to reflect storage costs consistent with the allocation of storage adopted in D.08-12-020 that are not currently reflected in current transportation rates;

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PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS CORE FIXED COST ACCOUNT (CFCA)

Sheet 2

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(Continued)

4. Accounting Procedures (Continued)

- h. A credit entry equal to the core portion of the following recorded revenues: transportation revenues from core deliveries; revenues from the sale of core storage capacity rights; base revenues that would have been collected from customers absent the core pricing flexibility program, and other revenues that the Commission has directed SoCalGas to allocate to the core market;
- i. An entry to amortize the previous year's balance;
- j. A credit entry equal to the increased revenues from the 1% surcharge in franchise fees charged to core customers in the City of Huntington Beach; and
- k. An entry equal to interest on the average balance in the account during the month, calculated in the manner described in Preliminary Statement, Part I, J.

SoCalGas shall maintain the GAF subaccount by recording entries at the end of each month, net of FF&U. as follows:

- a. A debit entry equal to actual funds provided to customers for paying their gas bills;
- b. A credit entry equal to funds to be used in providing customers with assistance in paying their gas bills: and
- c. An entry equal to interest on the average balance in the subaccount during the month, calculated in the manner described in Preliminary Statement, Part I. J.

5. Disposition

In each annual October regulatory account balance update filing, SoCalGas will amortize the projected year-end CFCA balance effective January 1 of the following year. The projected year-end balance will be allocated on an Equal Cents Per Therm (ECPT) basis.

For the GAF subaccount, the disposition of any unspent funds will be addressed in SoCalGas' next annual regulatory account update filing or other appropriate filing.

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4217 DECISION NO. 08-12-020

ISSUED BY Lee Schavrien Senior Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) DATE FILED Mar 1, 2011 Apr 1, 2011 **EFFECTIVE** RESOLUTION NO.

2H10

LOS ANGELES, CALIFORNIA CANCELING

PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS NONCORE STORAGE BALANCING ACCOUNT (NSBA)

Sheet 1

1. Purpose

The NSBA is a balancing account. The purpose of this account is to balance the authorized embedded costs for unbundled storage service as authorized in SoCalGas' 2009 Biennial Cost Allocation Proceeding (BCAP) Phase 2 decision, revised for any subsequent changes adopted in each cost allocation proceeding during the term of the Settlement Agreement and the corresponding reservation revenues collected from customers who contract for storage service under the unbundled storage program, including any net revenues from any storage expansions undertaken during the settlement period that are allocated to the unbundled storage program. In addition, pursuant to the Settlement Agreement, the net revenues from hub services collected under SoCalGas' G-PAL (Operational Hub Services) tariff that was approved pursuant to D.07-12-019 are treated as unbundled storage revenues and subject to the sharing mechanism as described in the Accounting Procedures Section below.

2. Applicability

See Disposition Section.

3. Rates

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

4. Accounting Procedures

The Utility shall maintain the NSBA by making entries at the end of the month as follows:

- A credit entry equal to 100% of the reservation and variable O&M charge revenues associated with the unbundled storage program and any net revenues from storage expansions undertaken during the settlement period that are allocated to the unbundled storage program, less the allowance for F&U on net revenue, as applicable;
- b. A credit entry equal to 100% of the net revenues from hub services provided under Schedule G-PAL less the allowance for F&U on net revenue, as applicable;
- c. A debit entry equal to one-twelfth of the authorized embedded costs allocated to unbundled storage service, less the allowance for F&U, as applicable;
- d. An adjustment to reflect storage costs consistent with the allocation of storage adopted in D.08-12-020 that are not currently reflected in current transportation rates and authorized storage margin as described in entry (c).

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(Continued)

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Revised LOS ANGELES, CALIFORNIA Original CANCELING

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

46963-G 44192-G

PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS NONCORE STORAGE BALANCING ACCOUNT (NSBA)

Sheet 2

(Continued)

e. An entry to adjust for the shareholders' allocation of net revenues [i.e., entries (a) through (c)] from unbundled storage and hub services in accordance with sharing mechanism described below;

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An entry equal to the amortization of the forecasted remaining balance less F&U; and

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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.

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5. Earnings Sharing Mechanism

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The Settlement Agreement adopted in Decision 08-12-020 in Phase 1 of SoCalGas' 2009 BCAP provides a sharing mechanism between ratepayers and shareholders for the 2008 net revenues from the sales of unbundled storage and hub services and continues the sharing mechanism for the NSBA over a six-year period beginning on January 1, 2009. As such, the cumulative net revenues as recorded in entries (a) through (d) above will be allocated 90/10 for the first \$15 million, then 75/25 for the next \$15 million and 50/50 for net revenues above \$30 million between ratepayers and shareholders, respectively, subject to an annual shareholder earnings cap of \$20 million.

6. Disposition

The balance of the NSBA shall be allocated in the Utility's cost allocation proceedings to all customers and incorporated in rates in connection with SoCalGas' Annual Regulatory Account Balance Update filing for rates effective January 1 of the following year.

ISSUED BY (TO BE INSERTED BY CAL. PUC) (TO BE INSERTED BY UTILITY) 4217 Lee Schavrien DATE FILED

Mar 1, 2011 Apr 1, 2011 **EFFECTIVE** Senior Vice President Regulatory Affairs RESOLUTION NO.

GENERAL

Cal. P.U.C. Sheet 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.

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Description and Listing of Balancing Accounts	
Purchased Gas Account (PGA)	
Core Fixed Cost Account (CFCA)	$ _{\mathrm{T}}$
Noncore Fixed Cost Account (NFCA)	1
Enhanced Oil Recovery Account (EORA)	
Noncore Storage Balancing Account (NSBA)	$ _{\mathrm{T}}$
California Alternate Rates for Energy Account (CAREA)	1
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Conservation Expense Necount (CEP1)	

(Continued)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 4217 \\ \text{DECISION NO.} & 08\text{-}12\text{-}020 \\ \end{array}$

ISSUED BY
Lee Schavrien
Senior Vice President
Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & \underline{Mar~1,~2011} \\ \text{EFFECTIVE} & \underline{Apr~1,~2011} \\ \text{RESOLUTION NO.} \end{array}$

ATTACHMENT C

Advice No. 4217

Summary of Natural Gas Rate Transportation Revenues

$\frac{TABLE\ 1}{Natural\ Gas\ Transportation\ Rate\ Revenues}$

Southern California Gas Company January 2011 Rates

2011 SCG RD Model v1-1-11

	P	Present Rates			Proposed Rates			Changes		
	1/1/2011	Average	1/1/2011	Jan-1-11	Proposed	Jan-1-11	Revenue	Rate	% Rate	
	Volumes	Rate	Revenues	Volumes	Rate	Revenues	Change	Change	change	
	Mth	\$/therm	\$000's	Mth	\$/therm	\$000's	\$000's	\$/therm	%	
	A	В	C	D	E	F	G	Н	I	
CORE										
Residential	2,483,989	\$0.53611	\$1,331,703	2,483,989	\$0.53620	\$1,331,917	\$213	\$0.00009	0.0%	
Commercial & Industrial	970,519	\$0.31532	\$306,021	970,519	\$0.31536	\$306,062	\$42	\$0.00004	0.0%	
NGV - Pre SempraWide	117,231	\$0.09109	\$10,678	117,231	\$0.09108	\$10,678	(\$0)	(\$0.00000)	0.0%	
SempraWide Adjustment	117,231	(\$0.00215)	(\$252)	117,231	(\$0.00215)	(\$252)	(\$0)	(\$0.00000)	0.0%	
NGV - Post SempraWide	117,231	\$0.08894	\$10,426	117,231	\$0.08894	\$10,426	(\$0)	(\$0.00000)	0.0%	
Gas A/C	1,210	\$0.08353	\$101	1,210	\$0.08353	\$101	(\$0)	(\$0.00000)	0.0%	
Gas Engine	18,080	\$0.10407	\$1,882	18,080	\$0.10407	\$1,882	(\$0)	(\$0.00000)	0.0%	
Total Core	3,591,030	\$0.45952	\$1,650,133	3,591,030	\$0.45959	\$1,650,388	\$255	\$0.00007	0.0%	
NONCORE COMMERCIAL & INDUSTRIAL										
Distribution Level Service	982,465	\$0.07408	\$72,776	982,465	\$0.07407	\$72,775	(\$1)	(\$0.00000)	0.0%	
Transmission Level Service (2)	457,697	\$0.02517	\$11,520	457,697	\$0.02517	\$11,520	(\$1)	(\$0.00000)	0.0%	
Total Noncore C&I	1,440,163	\$0.05853	\$84,297	1,440,163	\$0.05853	\$84,295	(\$2)	(\$0.00000)	0.0%	
NONCORE ELECTRIC GENERATION										
Distribution Level Service										
Pre Sempra Wide	353,995	\$0.03674	\$13,006	353,995	\$0.03674	\$13,005	(\$0)	(\$0.00000)	0.0%	
Sempra Wide Adjustment	353,995	\$0.00200	\$709	353,995	\$0.00200	\$709	(\$0)	(\$0.00000)	0.0%	
Distribution Level Post Sempra Wide	353,995	\$0.03874	\$13,715	353,995	\$0.03874	\$13,714	(\$1)	(\$0.00000)	0.0%	
Transmission Level Service (2)	2,472,969	\$0.02517	\$62,246	2,472,969	\$0.02517	\$62,242	(\$4)	(\$0.00000)	0.0%	
Total Electric Generation	2,826,964	\$0.02687	\$75,961	2,826,964	\$0.02687	\$75,956	(\$4)	(\$0.00000)	0.0%	
TOTAL RETAIL NONCORE	4,267,127	\$0.03756	\$160,257	4,267,127	\$0.03755	\$160,251	(\$6)	(\$0.00000)	0.0%	
WHOLESALE & INTERNATIONAL										
Wholesale Long Beach (2)	117,093	\$0.02517	\$2,947	117,093	\$0.02517	\$2,947	(\$0)	(\$0.00000)	0.0%	
SDGE Wholesale	1,230,285	\$0.00769	\$9,464	1,230,285	\$0.00768	\$9,445	(\$19)	(\$0.00002)	-0.2%	
Wholesale SWG (2)	81,737	\$0.00709	\$2,057	81,737	\$0.00703	\$2,057	(\$0)	(\$0.00002)	0.0%	
Wholesale Vernon (2)	116,135	\$0.02517	\$2,923	116,135	\$0.02517	\$2,923	(\$0)	(\$0.00000)	0.0%	
International (2)	53,990	\$0.02517	\$1,359	53,990	\$0.02517	\$1,359	(\$0)	(\$0.00000)	0.0%	
Total Wholesale & International & SDGE	1,599,240	\$0.01172	\$18,750	1,599,240	\$0.01171	\$18,731	(\$19)	(\$0.00001)	-0.1%	
	-,577,210		,, 00	-,,-		//	(++>)	(+===0001)		
TOTAL NONCORE	5,866,366	\$0.03051	\$179,008	5,866,366	\$0.03051	\$178,982	(\$25)	(\$0.00000)	0.0%	
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Unbundled Storage			\$26,470			\$26,240	(\$230)			
		004	04.055	0.455	004	A4 0F= · · ·		(0.0 0	0.77	
Total (excluding FAR)	9,457,396	\$0.19621	\$1,855,611	9,457,396	\$0.19621	\$1,855,611	(\$0)	(\$0.00000)	0.0%	
The state of the s		00.0			no a	400		40.05	0	
Firm Access Rights FAR \$/dth/day (3)	2,866	\$0.03802	\$39,773	2,866	\$0.03802	\$39,773	\$0	\$0.00000	0.0%	
SYSTEM TOTALw/SI,FAR,TLS,SW	9,457,396	\$0.20041	\$1,895,384	9,457,396	\$0.20041	\$1,895,384	(\$0)	(\$0.00000)	0.0%	
EOR Revenues	156,187	\$0.03220	\$5,029	156,187	\$0.03220	\$5,029	(\$0)	(\$0.00000)	0.0%	
Total Throughput w/EOR Mth/yr	9,613,583			9,613,583						

 $¹⁾ These \ rates \ are \ for \ Natural \ Gas \ Transportation \ Service \ from \ "Citygate \ to \ Meter". \ The \ FAR \ rate \ is \ for \ service \ from \ Receipt \ Point \ to \ Citygate.$

³⁾ FAR charge is as a separate rate. Core will pay through procurement rate, noncore as a separate charge. See Table 5 for actual FAR rates.

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	368 955	\$0.02517	\$9.287	368 955			(\$1)	(\$0,00000)	0.0%
WHOLE Sale & IIIternational (excl SDGE)									

 $²⁾ These\ Transmission\ Level\ Service\ "TLS"\ amounts\ represent\ the\ average\ transmission\ rate,\ see\ Table\ 5\ or\ detail\ list\ of\ TLS\ rates.$