#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

May 18, 2012



#### **Advice Letter 4359**

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

Subject: Establishment of the Pipeline Safety and Reliability Memorandum Account (PSRMA) Pursuant to D.12-04-021

Dear Ms. Prince:

Advice Letter 4359 is effective May 20, 2012.

Sincerely,

Edward F. Randolph, Director

Edward Ramlofate

**Energy Division** 



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

April 20, 2012

Advice No. 4359 (U 904 G)

Public Utilities Commission of the State of California

**Subject:** Establishment of the Pipeline Safety and Reliability Memorandum Account (PSRMA) Pursuant to Decision (D.) 12-04-021

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**

Pursuant to Ordering Paragraph (OP) 3 of Decision (D.) 12-04-021, this filing seeks approval to establish the PSRMA as discussed below.

#### Background

On April 19, 2012, in D.12-04-021, the Commission, among other things, adopted the transfer of the reasonableness and ratemaking review of the Natural Gas Pipeline Safety Enhancement Plan (PSEP) proposed by San Diego Gas & Electric Company and SoCalGas from Rulemaking (R.) 11-02-019, to their pending Triennial Cost Allocation Proceeding (TCAP) Application (A.) 11-11-002, and authorizes the establishment of a memorandum account for both companies as described below.

#### **PSRMA**

Pursuant to OP 3 of D.12-04-021, SoCalGas is establishing the PSRMA to record for later Commission ratemaking consideration the total, fully loaded and escalated costs of implementing its PSEP and costs associated with the review of records and implementation of interim safety measures, as described in Attachments A and B, respectively, filed in its January 13, 2012 comments supporting the transfer of the PSEP to the TCAP and providing further detail on its proposed memorandum account. Specifically, the PSRMA will record actual revenue requirements associated with the total costs incurred during the first 12 months of implementing its PSEP and the costs associated with document review in compliance with Commission Resolution L-410 and interim safety measures. The disposition of the PSRMA balance will be addressed in SoCalGas' 2013 TCAP or other future Commission proceeding. SoCalGas anticipates implementing its PSEP beginning June 1, 2012.

#### **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 May 10, 2012. 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 the Energy Division Tariff Unit (<u>EDTariffUnit@cpuc.ca.gov</u>). A copy of the protest should also be sent via both e-mail <u>and</u> 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 this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval). This is consistent with OP 3 of D.12-04-021 and, therefore, SoCalGas respectfully requests that this filing be approved and made effective on May 20, 2012, which is 30 calendar 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 service lists for R.11-02-019 and A.11-11-002.

Rasha Prin	ce
Director, Regulato	ry Affairs

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLE	TED BY UTILITY (At	tach 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) <u>244-2846</u>			
☐ 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) #: 4359				
Subject of AL: <u>Establishment of the</u> pursuant to D.12-04-021	Pipeline Safety an	d Reliability Memorandum Account (PSRMA)		
Keywords (choose from CPUC listing)	: Memorandum A	account		
AL filing type:  Monthly  Quarter	rly 🗌 Annual 🛛 C	ne-Time 🗌 Other		
If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-04-021				
Does AL replace a withdrawn or reject	cted AL? If so, ider	ntify the prior AL <u>No</u>		
Summarize differences between the A		•		
Does AL request confidential treatme	ent? If so, provide e	explanation:		
Resolution Required? $\square$ Yes $\boxtimes$ No		Tier Designation: 1 2 3		
Requested effective date: 5/20/12		No. of tariff sheets: <u>5</u>		
Estimated system annual revenue eff	fect: (%): <u>Non</u>	<u>e</u>		
Estimated system average rate effect	(%): <u>None</u>			
· · · · · · · · · · · · · · · · · · ·		L showing average rate effects on customer		
classes (residential, small commercia				
Tariff schedules affected: Prelin	minary Statement	Part VI and TOC General		
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 10 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:				
CPUC, Energy Division		outhern California Gas Company		
Attention: Tariff Unit		ttention: Sid Newsom		
505 Van Ness Ave. San Francisco, CA 94102		555 West Fifth Street, GT14D6 os Angeles, CA 90013-1011		
EDTariffUnit@cpuc.ca.gov		newsom@semprautilities.com		

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

## **ATTACHMENT A**

Advice No. 4359

(See Attached Service Lists)

Alcantar & Kahl Alcantar & Kahl Alcantar & Kahl LLP Seema Srinivasan Kari Harteloo **Annie Stange** klc@a-klaw.com sls@a-klaw.com sas@a-klaw.com Alcantar & Kahl, LLP Azusa Light & Water Barkovich & Yap Mike Cade **George Morrow** Catherine E. Yap wmc@a-klaw.com gmorrow@ci.azusa.ca.us ceyap@earthlink.net **CPUC CPUC Beta Consulting** John Burkholder **Pearlie Sabino** Energy Rate Design & Econ. burkee@cts.com pzs@cpuc.ca.gov 505 Van Ness Ave., Rm. 4002 San Francisco, CA 94102 **CPUC CPUC - DRA** California Energy Market **Consumer Affairs Branch** R. Mark Pocta **Lulu Weinzimer** 505 Van Ness Ave., #2003 luluw@newsdata.com rmp@cpuc.ca.gov San Francisco, CA 94102 **California Public Utilities Commission Calpine Corp** City of Banning **Paul Deaver Avis Clark Paul Toor** P. O. Box 998 pdeaver@energy.state.ca.us aclark@calpine.com Banning, CA 92220 City of Burbank City of Colton City of Long Beach Gas & Oil **Bruno Jeider** Thomas K. Clarke Renee Williams bjeider@ci.burbank.ca.us 650 N. La Cadena Drive Renee.Williams@LongBeach.gov Colton, CA 92324 City of Long Beach Gas & Oil City of Long Beach Gas & Oil Dept. City of Los Angeles **Dennis Burke David Sanchez** City Attorney 200 North Main Street, 800 Dennis.Burke@LongBeach.gov David.Sanchez@LongBeach.gov Los Angeles, CA 90012 City of Pasadena - Water and Power City of Riverside City of Vernon Dept. Joanne Snowden Dan Bergmann **G** Bawa jsnowden@riversideca.gov dan@igservice.com GBawa@cityofpasadena.net **Commerce Energy County of Los Angeles** Commerce Energy **Catherine Sullivan Blake Lazusso** Stephen Crouch csullivan@commerceenergy.com blasuzzo@commerceenergy.com SCrouch@isd.lacounty.gov **DGS Crossborder Energy** Davis, Wright, Tremaine Tom Beach **Henry Nanjo** Judy Pau tomb@crossborderenergy.com

**Dept. of General Services** 

**Celia Torres** 

celia.torres@dgs.ca.gov

Henry.Nanjo@dgs.ca.gov

**Douglass & Liddell** Donald C. Liddell liddell@energyattorney.com judypau@dwt.com

Douglass & Liddell Dan Douglass

douglass@energyattorney.com

Southern California Edison Co.

Colin.Cushnie@SCE.com

Colin E. Cushnie

Downey, Brand, Seymour & Rohwer **Dynegy Dynegy - West Generation** Dan Carroll Mark Mickelson Joseph M. Paul Mark.Mickelson@dynegy.com dcarroll@downeybrand.com Joe.Paul@dynegy.com **Gas Transmission Northwest General Services Administration** Genon Energy, Inc. Corporation Facilities Management (9PM-FT) **Greg Bockholt Bevin Hong** 450 Golden Gate Ave. Greg.Bockholt@Genon.com Bevin\_Hong@transcanada.com San Francisco, CA 94102-3611 Goodin, MacBride, Squeri, Ritchie & Hanna & Morton Iberdrola Renewables Energy Services Day, LLP Norman A. Pedersen, Esq. **Julie Morris** James D. Squeri npedersen@hanmor.com Julie.Morris@iberdrolaren.com jsqueri@gmssr.com **Imperial Irrigation District JBS Energy** Kern River Gas Transmission Company K. S. Noller Jeff Nahigian Janie Nielsen P. O. Box 937 jeff@jbsenergy.com Janie.Nielsen@KernRiverGas.com Imperial, CA 92251 **LADWP LA County Metro LADWP Julie Close** Nevenka Ubavich **Robert Pettinato** closeJ@metro.net Robert.Pettinato@ladwp.com nevenka.ubavich@ladwp.com Law Offices of William H. Booth Luce, Forward, Hamilton & Scripps MRW & Associates William Booth John Leslie Robert Weisenmiller wbooth@booth-law.com jleslie@luce.com mrw@mrwassoc.com **Manatt Phelps Phillips** Manatt, Phelps & Phillips, LLP **March Joint Powers Authority** Randy Keen **David Huard** Cindy Lockwood rkeen@manatt.com dhuard@manatt.com lockwood@marchjpa.com Morrison & Foerster LLP National Utility Service, Inc. Navigant Consulting, Inc. Cara Goldenberg Jim Bovle Ray Welch cgoldenberg@mofo.com One Maynard Drive, P. O. Box 712 ray.welch@navigantconsulting.com Park Ridge, NJ 07656-0712 **PG&E Tariffs Praxair Inc** RCS, Inc **Pacific Gas and Electric Rick Noger** Don Schoenbeck PGETariffs@pge.com rick\_noger@praxair.com dws@r-c-s-inc.com SCE Safeway, Inc Sierra Pacific Company Karyn Gansecki Cathy Ikeuchi Christopher A. Hilen karyn.gansecki@sce.com cathy.ikeuchi@safeway.com chilen@sppc.com

Southern California Edison Co.

Kevin Cini

Kevin.Cini@SCE.com

Southern California Edison Co.

john.guinlan@sce.com

John Quinlan

Southern California Edison Company Michael Alexander Michael.Alexander@sce.com

TURN
Marcel Hawiger
marcel@turn.org

Southwest Gas Corp.
John Hester
John.Hester@swgas.com

The Mehle Law Firm PLLC Colette B. Mehle cmehle@mehlelaw.com

Sutherland, Asbill & Brennan Keith McCrea kmccrea@sablaw.com

Western Manufactured Housing Communities Assoc. Sheila Day sheila@wma.org

## ATTACHMENT B Advice No. 4359

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 48110-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 1	Revised 47557-G*
Original 48111-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT (PSRMA), Sheet 1	
Revised 48112-G Revised 48113-G Revised 48114-G	TABLE OF CONTENTS TABLE OF CONTENTS TABLE OF CONTENTS	Revised 48109-G Revised 47560-G Revised 47813-G

Sheet 1

LOS ANGELES, CALIFORNIA CANCELING Revised 47557-G\* CAL. P.U.C. SHEET NO.

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

#### 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 Negotiated Core Contract Memorandum Account (VNCCMA)

Research Royalty Memorandum Account (RRMA)

Intervenor Award Memorandum Account (IAMA)

Z Factor Account (ZFA)

Self-Generation Program Memorandum Account (SGPMA)

FERC Settlement Proceeds Memorandum Account (FSPMA)

Gain/Loss On Sale Memorandum Account (GLOSMA)

Affiliate Transfer Fee Account (ATFA)

Firm Access and Storage Rights Memorandum Account (FASRMA)

System Reliability Memorandum Account (SRMA)

Fire Hazard Prevention Memorandum Account (FHPMA)

California Solar Initiative Thermal Program Memorandum Account (CSITPMA)

Honor Rancho Storage Memorandum Account (HRSMA)

Wildfire Expense Memorandum Account (WEMA)

Honor Rancho Cost Recovery Memorandum Account (HRCRMA)

Natural Gas Appliance Testing Memorandum Account (NGATMA)

Energy Savings Assistance Programs Memorandum Account (ESAPMA)

General Rate Case Memorandum Account (GRCMA)

Pipeline Safety and Reliability Memorandum Account (PSRMA)

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4359 DECISION NO. 12-04-021

**ISSUED BY** Lee Schavrien Senior Vice President

(TO BE INSERTED BY CAL. PUC) Apr 20, 2012 DATE FILED May 20, 2012 **EFFECTIVE** 

RESOLUTION NO.

1H11

LOS ANGELES, CALIFORNIA CANCELING

#### PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT (PSRMA)

Sheet 1

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#### 1. Purpose

The purpose of the PSRMA is to record the incremental costs associated with compliance with the Commission's directives in Rulemaking 11-02-019. In Decision (D.) 12-04-021, the Commission directs SoCalGas to file this advice letter to create a memorandum account to record the escalated direct and incremental overhead costs of implementing its proposed Pipeline Safety Enhancement Plan (PSEP) as well as the costs associated with the review of records and interim safety measures. Should cost estimates for implementing the PSEP and reviewing records increase by more than 10%, SoCalGas will file a Tier 1 advice letter notifying the Commission of such increased costs.

#### 2. Applicability

This account shall apply to all gas customers except for those specifically excluded by the Commission.

#### 3. Rates

See Disposition Section.

#### 4. Accounting Procedures

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

- a) A debit entry equal to the actual incremental costs (i.e., O&M and capital-related costs such as depreciation, income taxes and return) associated with the PSEP costs incurred during the implementation of its PSEP;
- b) An entry equal to the incremental costs associated with the review of records performed in compliance with Commission Resolution L-410 and implementation of interim safety measures, pursuant to D.12-04-021;
- c) An entry equal to the amortization of the PSRMA balance as authorized by the Commission; and
- d) 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.

#### 5. Disposition

The disposition of this account will be addressed in a Commission decision in SoCalGas' 2013 Triennial Cost Allocation Proceeding (Application 11-11-002) or other future Commission decisions.

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 4359
DECISION NO. 12-04-021

ISSUED BY **Lee Schavrien**Senior Vice President

(TO BE INSERTED BY CAL. PUC)
DATE FILED Apr 20, 2012
EFFECTIVE May 20, 2012
RESOLUTION NO.

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LOS ANGELES, CALIFORNIA CANCELING

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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.

<u>GENERAL</u>	Cal. P.U.C. Sheet No.
Title Page	40864-G
Table of ContentsGeneral and Preliminary Statement	48112-G,48113-G,48114-G
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Table of ContentsList of Contracts and Deviations	
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Part III Cost Allocation and Revenue Requirement 45267-G,45268-C	G,45269-G,47786-G,47787-G
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Part V Balancing Accounts	
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Core Fixed Cost Account (CFCA)	
Noncore Fixed Cost Account (NFCA)	
Enhanced Oil Recovery Account (EORA)	
Noncore Storage Balancing Account (NSBA)	The state of the s
California Alternate Rates for Energy Account (CAREA)	
Hazardous Substance Cost Recovery Account (HSCRA)	
Gas Cost Rewards and Penalties Account (GCRPA)	
Pension Balancing Account (PBA)	The state of the s
Post-Retirement Benefits Other Than Pensions Balancing Account (PE	бОРВА) . 45015-G,45016-G

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4359 12-04-021 DECISION NO.

ISSUED BY Lee Schavrien Senior Vice President

(TO BE INSERTED BY CAL. PUC) DATE FILED Apr 20, 2012 May 20, 2012 **EFFECTIVE** RESOLUTION NO.

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### PRELIMINARY STATEMENT (Continued)

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Compressor Station Fuel and Power Balancing Account (CFPBA)
Distribution Integrity Management Program Balancing Account (DIMPBA)
Rewards and Penalties Balancing Account (RPBA)
On-Bill Financing Balancing Account (OBFBA)
Company Use Fuel for Load Balancing Account (CUFLBA)
Backbone Transmission Balancing Account (BTBA)
Advanced Metering Infrastructure Balancing Account (AMIBA)46058-G,46059-G,56060-G
Part VI Memorandum Accounts
Description and 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) 40899-G
Vernon Rate Savings Memorandum Account (VRSMA)
Vernon Negotiated Core Contract Memorandum Account (VNCCMA)
Research Royalty Memorandum Account (RRMA)
Intervenor Award Memorandum Account (IAMA)
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FERC Settlement Proceeds Memorandum Account (FSPMA)
Gain/Loss on Sale Memorandum Account (GLOSMA)
Affiliate Transfer Fee Account (ATFA)
Firm Access and Storage Rights Memorandum Account (FASRMA)
2009-2011 Energy Efficiency Memorandum Account (EEMA)
System Reliability Memorandum Account (SRMA)
Fire Hazard Prevention Memorandum Account (FHPMA)

(Continued)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 4359 \\ \text{DECISION NO.} & 12\text{-}04\text{-}021 \\ \end{array}$ 

ISSUED BY
Lee Schavrien
Senior Vice President

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & Apr \ 20, \ 2012 \\ \text{EFFECTIVE} & May \ 20, \ 2012 \\ \text{RESOLUTION NO.} \end{array}$ 

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CAL. P.U.C. SHEET NO.

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(Continued)

### PRELIMINARY STATEMENT (Continued)

Part VI Memorandum Accounts (Continued)

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Part IX Hazardous Substances Mechanism (HSM)	
Part X Global Settlement	
Part XI Performance Based Regulation (PBR)	
Part XII Gain/Loss On Sale Mechanism	
Part XIII Native Gas Program Mechanism (NGPM)42599-G, 42600-G, 42601-G, 42602-G 42603-G, 42604-G, 42605-G	

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4359 DECISION NO. 12-04-021

Senior Vice President

(TO BE INSERTED BY CAL. PUC) Apr 20, 2012 DATE FILED May 20, 2012 EFFECTIVE RESOLUTION NO.