

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 14, 2013

Advice Letter 4436

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

Subject: Revision of Annual Core Storage Inventory Target

Dear Ms. Prince:

Advice Letter 4436 is effective January 13, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
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

December 14, 2012

Advice No. 4436
(U 904 G)

Public Utilities Commission of the State of California

Subject: Revision of Annual Core Storage Inventory Target

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) a revision to SoCalGas' Preliminary Statement, Part VIII, Gas Cost Incentive Mechanism (GCIM), as shown in Attachment B.

Background

A. Annual Core Storage Inventory Target

SoCalGas' GCIM Preliminary Statement provides for the following annual core storage inventory target:

The Annual Storage Inventory target on November 1 is 79 Bcf of the physical gas supply, with an accepted variance of +5/-2 Bcf. This target does not include any park or net loan positions.¹

This target was first proposed by SoCalGas and the Division of Ratepayer Advocates (DRA) as part of the initial GCIM agreement back in 1993. This agreement was adopted by the Commission in Decision (D.) 94-03-076 and an annual core storage target has been a feature of SoCalGas' GCIM ever since. The target was initially set by the Commission at 70 Bcf, with a potential variance of +5/-5 Bcf.²

In D.06-10-029 (Year 11 GCIM decision), the Commission adopted a Joint Recommendation from SoCalGas, DRA, and The Utility Reform Network (TURN) that changed the potential annual core storage target variance from +5/-5 Bcf to +5/-2 Bcf, and provided that "[i]f additional storage inventory capacity is allocated to SoCalGas' core beyond 70 Bcf, the core's October 31 physical inventory storage target will be increased by that amount."³

¹ GCIM Preliminary Statement, Section (C)(7) (emphasis in original).

² D.94-03-076, mimeo., Appendix A (GCIM Agreement) at p. 12.

³ D.06-10-029, mimeo., at 7.

In D.07-12-019, the Commission approved the consolidation of SoCalGas and SDG&E's core portfolios, and adopted a combined core portfolio inventory capacity of 79 Bcf to reflect the inventory capacity held by SDG&E's core customers.⁴

B. 2009 BCAP Provisions

In D.08-12-020, the Commission adopted a settlement agreement (Settlement) in Phase 1 of SoCalGas' 2009 Biennial Cost Allocation Proceeding (BCAP). One of the provisions of this Settlement is that SoCalGas would use commercially reasonable efforts to expand storage inventory capacity by 7 Bcf over the period 2009-2014.⁵ Another Settlement provision provides that SoCalGas will allocate a portion of this proposed new inventory capacity to core customers, according to an estimated schedule that calls for four 1 Bcf increases in core inventory capacity – one each year from 2010 through 2013.⁶ SoCalGas was able to expand storage inventory capacity as proposed in the Settlement, and made 80 Bcf and 81 Bcf of inventory capacity available to core customers in GCIM Years 17 and 18, respectively⁷. In GCIM Year 19 (April 1, 2012, through March 31, 2013) core customers will have 82 Bcf of storage inventory capacity.⁸

The Settlement adopted by the Commission in D.08-12-020 also provides as follows: “[t]he combined core customers of SDG&E/SoCalGas will balance within the storage inventory capacity allocated to them under this SA.”⁹

Proposal

SoCalGas proposes to update the core inventory target in its Preliminary Statement, Part VIII, from 79 Bcf to 82 Bcf to reflect the additional inventory capacity now available to core customers. This change is consistent with the Commission's direction in D.06-10-029 that “[i]f additional storage inventory capacity is allocated to SoCalGas' core beyond 70 Bcf, the core's October 31 physical inventory storage target will be increased by that amount.”¹⁰ The combined core has already been increasing its internal operational storage target with each recent increase in core storage inventory capacity, so this proposed tariff change would be consistent with SoCalGas' current operations as well.

SoCalGas also proposes to change its potential storage target variance from the existing +5/-2 Bcf to +0/-2 Bcf. This change would reflect the fact that the combined core must balance within the storage capacity allocated to it.

SoCalGas has consulted with DRA about both of these proposed tariff changes, and SoCalGas has been authorized by DRA to state that DRA supports both proposed changes.

⁴ See D.07-12-019, mimeo., at 114 (Ordering Paragraph 4).

⁵ D.08-12-020, mimeo., at p. 3 of Attachment 1 (Settlement Agreement, Section 6).

⁶ D.08-12-020, mimeo., at p. 4 of Attachment 1 (Settlement Agreement, Section 7).

⁷ GCIM Year 17 covered the period April 1, 2010, through March 31, 2011, and GCIM Year 18 covered the period April 1, 2011, through March 31, 2012.

⁸ SoCalGas anticipates being able to provide core customers with the final 1 Bcf of storage inventory capacity in 2013, bringing total core inventory capacity at that time to 83 Bcf. But this final 1 Bcf has not yet been added to core inventory.

⁹ D.08-12-020, mimeo., at p. 5 of Attachment 1 (Settlement Agreement, Section 9).

¹⁰ D.06-10-029, mimeo., at 7.

This filing will not result in an increase or decrease in any rate or charge, conflict with any rate schedules or any rules, or cause the withdrawal of service.

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 of this Advice Letter, which is January 3, 2013. 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 to the attention of the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). 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 this advice letter be approved January 13, 2013, 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 the parties in A.12-06-005, SoCalGas Year 18 GCIM and A.08-02-001, 2009 BCAP and A.11-11-002, 2013 TCAP.

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)**

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) #: 4436

Subject of AL: Revision of Annual Core Storage Inventory Target

Keywords (choose from CPUC listing): Storage

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

If 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 AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

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

Resolution Required? Yes No Tier Designation: 1 2 3

Requested effective date: 1/13/13 No. of tariff sheets: 3

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 Statement, Part VIII 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 Ave.,
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Southern California Gas Company
Attention: Sid Newsom
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011
SNewsom@semprautilities.com
tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4436

(See Attached Service Lists)

GOODIN MACBRIDE SQUERI DAY & RITCHIE
JEANNE B. ARMSTRONG
 jarmstrong@goodinmacbride.com

CROSBORDER ENERGY
R. THOMAS BEACH
 tomb@crossborderenergy.com

ALCANTAR & KAHL
WILLIAM H. BOOTH
 whb@a-klaw.com

EXXON MOBIL CORP.
DANIEL J. BRINK
 daniel.j.brink@exxonmobil.com

ELLISON SCHNEIDER & HARRIS, LLP
ANDREW B. BROWN
 abb@eslawfirm.com

COGENERATION CONTRACT SERVICES
MARSHALL D. CLARK
 Marshall.Clark@dgs.ca.gov

GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
BRIAN T. CRAGG
 bcragg@goodinmacbride.com

CALIF PUBLIC UTILITIES COMMISSION
Franz Cheng
 fcc@cpuc.ca.gov

FEDERAL EXECUTIVE AGENCIES
NORMAN J. FURUTA
 norman.furuta@navy.mil

SOUTHERN CALIFORNIA GAS COMPANY
DAVID J. GILMORE
 DGilmore@SempraUtilities.com

THE UTILITY REFORM NETWORK
MARCEL HAWIGER
 marcel@turn.org

SOUTHERN CALIFORNIA EDISON COMPANY
GLORIA M. ING
 Gloria.Ing@sce.com

ALCANTAR & KAHL, LLP
EVELYN KAHL
 ek@a-klaw.com

UTILITY COST MANAGEMENT LLC
DARA KERKORIAN
 dk@utilitycostmanagement.com

PACIFIC GAS AND ELECTRIC COMPANY
ANN H. KIM
 AHK4@pge.com

EL PASO CORPORATION-WESTERN PIPELINES
STEVE KORNER
 mark.minich@elpaso.com

SOUTHWEST GAS CORPORATION
KEITH A. LAYTON
 keith.layton@swgas.com

MCKENNA LONG & ALDRIDGE LLP
JOHN W. LESLIE, ESQ.
 jleslie@McKennaLong.Com

JBS ENERGY, INC.
WILLIAM MARCUS
 bill@jbsenergy.com

SUTHERLAND ASBILL & BRENNAN LLP
KEITH R. MCCREA
 keith.mccrea@sutherland.com

CALIF PUBLIC UTILITIES COMMISSION
Harvey Y. Morris
 hym@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Scott Mosbaugh
 rsm@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Richard A. Myers
 ram@cpuc.ca.gov

CALIFORNIA LEAGUE OF FOOD PROCESSORS
ROB NEENAN
 rob@clfp.com

DAVIS WRIGHT TREMAINE LLP
EDWARD W. O'NEILL
 edwardoneill@dwt.com

HANNA & MORTON LLP
NORMAN A. PEDERSEN, ESQ.
 npedersen@hanmor.com

ANDERSON, DONOVAN & POOLE
EDWARD G. POOLE
 epoole@adplaw.com

CALIF PUBLIC UTILITIES COMMISSION
Marion Peleo
 map@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Robert M. Pocta
 rmp@cpuc.ca.gov

SEMPRA LNG
WILLIAM D. RAPP
 WRapp@Sempraglobal.com

CALIF PUBLIC UTILITIES COMMISSION
Rashid A. Rashid
rhd@cpuc.ca.gov

UCAN
MICHAEL SHAMES
mshames@ucan.org

CALIF PUBLIC UTILITIES COMMISSION
Pearlie Sabino
pzs@cpuc.ca.gov

**CALIFORNIA COGENERATION
COUNCIL**
BETH VAUGHAN
beth@beth411.com

CALIF PUBLIC UTILITIES COMMISSION
John S. Wong
jsw@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Marzia Zafar
zaf@cpuc.ca.gov

AGUIRRE MORRIS & SEVERSON LLP
MICHAEL J. AGUIRRE, ESQ.
maguirre@amslawyers.com

SOUTHERN CALIFORNIA EDISON
COMPANY
RUSSELL A. ARCHER
Russell.Archer@SCE.com

CPUC
OGEONYE ENYINWA
oe2@cpuc.ca.gov

THE UTILITY REFORM NETWORK
ROBERT FINKELSTEIN
bfinkelstein@turn.org

SOUTHERN CALIFORNIA GAS
COMPANY
DAVID J. GILMORE
DGilmore@SempraUtilities.com

CALIF PUBLIC UTILITIES COMMISSION
Belinda Gatti
beg@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Robert Haga
rwh@cpuc.ca.gov

UTILITY WORKERS UNION OF
AMERICA
WILLIAM JULIAN II
billjulian@sbcglobal.net

ALCANTAR & KAHL, LLP
EVELYN KAHL
ek@a-klaw.com

CALIF PUBLIC UTILITIES COMMISSION
Matthew A. Karle
mk3@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Sepideh Khosrowjah
skh@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Andrew Kotch
ako@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Kelly C. Lee
kcl@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Douglas M. Long
dug@cpuc.ca.gov

CALIFORNIA PUBLIC UTILITIES
COMMISSION
RICHARD MYERS
ram@cpuc.ca.gov

DAVIS WRIGHT TREMAINE, LLP
EDWARD W. O'NEILL
edwardoneill@dwt.com

CALIFORNIA PUBLIC UTILITIES
COMMISSION
DAVID PECK
DBP@cpuc.ca.gov

HANNA AND MORTON, LLP
NORMAN A. PEDERSEN
npedersen@hanmor.com

UTILITY CONSUMERS ACTION
NETWORK
DAVID A. PEFFER, ESQ.
DPeffer@ucan.org

SOUTHWEST GAS CORPORATION
PAMELA RUCKEL
pamela.ruckel@swgas.com

CALIF PUBLIC UTILITIES COMMISSION
Laura J. Rosen
ljt@cpuc.ca.gov

UTILITY CONSUMERS' ACTION
NETWORK
MICHAEL SHAMES
mshames@sandiegocan.org

CALIF PUBLIC UTILITIES COMMISSION
Pearlie Sabino
pzs@cpuc.ca.gov

SOUTHERN CALIFORNIA GAS
COMPANY
MICHAEL FRANCO
MFranco@SempraUtilities.com

CALIF PUBLIC UTILITIES COMMISSION
Cleveland Lee
cwl@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
David Peck
dbp@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Linda Rochester
lrr@cpuc.ca.gov

ATTACHMENT B
Advice No. 4436

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 48686-G	PRELIMINARY STATEMENT, PART VIII, GAS COST INCENTIVE MECHANISM, Sheet 5	Revised 48198-G
Revised 48687-G	TABLE OF CONTENTS	Revised 48685-G
Revised 48688-G	TABLE OF CONTENTS	Revised 48200-G

PRELIMINARY STATEMENT
PART VIII
GAS COST INCENTIVE MECHANISM

(Continued)

C. GAS COST INCENTIVE MECHANISM (GCIM) METHODOLOGY (Continued)

- k. Pursuant to Preliminary Statement, Part VI, Description of Regulatory Accounts - Memorandum, the Blythe Operational Flow Requirement Memorandum Account (BOFRMA) will record charges associated with the Utility Gas Procurement Department's purchasing and delivery of gas to sustain operational flows at Blythe. GCIM actual cost will be adjusted for charges or credits to the BOFRMA. Entries to this account, except for interest and amortization, along with related GCIM adjustments, ceased on April 1, 2009, the date the responsibility for managing minimum flow requirements for system reliability was transferred from the Utility Gas Procurement Department to the System Operator pursuant to D.07-12-019.
- 7. The Annual Storage Inventory target on November 1 is 82 Bcf of the physical gas supply, with an accepted variance of +0/-2 Bcf. This target does not include any park or net loan positions. If the November 1 target is not attained, deliveries must be made to insure that a minimum of 69 Bcf of actual physical gas in the core's inventory is reached by December 1. The January, February and March minimum month-end targets (equivalent to peak day minimums necessary for serving the core) must be met. Any deviation from these storage targets should be explained in SoCalGas' annual GCIM filing. SoCalGas has obtained agreement from DRA for a mid-season storage target of 47 Bcf as of July 31, 2012, which is a minimum storage level SoCalGas must meet unless otherwise agreed to by DRA and TURN. TURN was unable to participate in the review process for this most recent mid-season storage target due to time constraints. This target may include net loan positions.
- 8. Tolerance. To determine GCIM rewards or penalties, tolerance bands above or below the benchmark budget are used. Tolerance bands are calculated as a percentage of the monthly gas commodity portion of the benchmark budget and is added to or subtracted from the benchmark budget as "upper tolerance band" or "lower tolerance band" (sharing bands), respectively. The specific percentages are approved by the CPUC and may be redetermined in subsequent CPUC decisions (See Section 9).
- 9. Calculation of Rewards and Penalties Under GCIM
 - a. On an annual basis, actual total purchased gas costs are compared to the annual benchmark budget to determine if a reward/savings or penalty applies.
 - b. If actual total purchased gas costs for the incentive year are less than the annual benchmark budget, the difference constitutes a savings incentive to be shared between ratepayers and shareholders as defined by the Sharing Bands as follows:

Sharing Band	Ratepayer	Shareholder
0.0% -1.00%	100%	0%
1.00% - 5.00%	75%	25%
5.00% & Above	90%	10%

The shareholder reward will be capped at 1.5% of the actual annual gas commodity costs.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4436
 DECISION NO. 06-10-029, 08-12-020

ISSUED BY
Lee Schavrien
 Senior Vice President

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Dec 14, 2012
 EFFECTIVE Jan 13, 2013
 RESOLUTION NO. _____

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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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(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4436
 DECISION NO. 06-10-029, 08-12-020

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(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 4436
 DECISION NO. 06-10-029, 08-12-020

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Lee Schavrien
 Senior Vice President

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