# **PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



July 2, 2013

Advice Letter 4499-G

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 4499-G is effective as of June 28, 2013.

Sincerely,

Edward F. Randolph, Director

Edward Randofah

**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

May 29, 2013

Advice No. 4499 (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 its 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 <u>Annual Storage Inventory</u> 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.<sup>1</sup>

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.<sup>2</sup>

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."

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<sup>&</sup>lt;sup>1</sup> Preliminary Statement, Part VIII, GCIM, Section C.7 (emphasis in original).

<sup>&</sup>lt;sup>2</sup> D.94-03-076, mimeo., Appendix A (GCIM Agreement) at p. 12.

<sup>&</sup>lt;sup>3</sup> D.06-10-029, mimeo., at p. 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.<sup>4</sup>

# 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. 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. SoCalGas was able to expand storage inventory capacity as proposed in the Settlement, and made 80 Bcf, 81 Bcf, and 82 Bcf of inventory capacity available to core customers in GCIM Years 17, 18, and 19, respectively.

### **Proposal**

SoCalGas proposes to update the core inventory target in its Preliminary Statement, Part VIII, from 82 Bcf to 83 Bcf to reflect the last Bcf of inventory capacity now available to core customers as of April 1, 2013. 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." 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.

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.

### **Protests**

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 June 18, 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 Attn: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

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

<sup>&</sup>lt;sup>5</sup> D.08-12-020, mimeo., at p.3 of Attachment 1 (Settlement Agreement, Section 6).

<sup>&</sup>lt;sup>6</sup> D.08-12-020, mimeo., at p.3 of Attachment 1 (Settlement Agreement, Section 7).

<sup>&</sup>lt;sup>7</sup> GCIM Year 17 covered the period April 1, 2010 through March 31, 2011, GCIM Year 18 covered the period April 1, 2011 through March 31, 2012, and GCIM Year 19 covered the period April 1, 2012 through March 31, 2013.

<sup>&</sup>lt;sup>8</sup> D.06-10-029, mimeo., at 7.

Copies of the protest should also be sent via e-mail to the attention of Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). 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: <a href="mailto:snewsom@SempraUtilities.com">snewsom@SempraUtilities.com</a>

## **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 June 28, 2013, which is 30 calendar days after the date filed.

# **Notice**

A copy of this advice letter is being sent to all parties listed on Attachment A, which includes the interested parties in A.12-06-005, SoCalGas' Year 18 GCIM, A.08-02-001, 2009 BCAP, and A.11-11-002, 2013 TCAP.

Rasha Prince
Director
Regulatory Accounts

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

# ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLE	ETED BY UTILITY (A	attach additional pages as needed)				
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G)						
Utility type:	Contact Person: Sid Newsom					
☐ ELC ☐ GAS	Phone #: (213) 244-2846					
☐ PLC ☐ HEAT ☐ WATER	· · · · · ·	@semprautilities.com				
EXPLANATION OF UTILITY TY	YPE	(Date Filed/ Received Stamp by CPUC)				
ELC = Electric GAS = Gas						
PLC = Pipeline HEAT = Heat W	NATER = Water					
Advice Letter (AL) #: 4499	Advice Letter (AL) #: 4499					
Subject of AL: GCIM Annual Storage	Inventory Target					
Keywords (choose from CPUC listing):	Storage					
AL filing type:  Monthly  Quarter	ly 🔀 Annual 🗌 On	e-Time Other				
If AL filed in compliance with a Comm	ission order, indicat	e relevant Decision/Resolution #:				
D.06-10-029						
Does AL replace a withdrawn or rejector	ed AL? If so, identif	fy the prior AL No				
Summarize differences between the AL	and the prior with	drawn or rejected AL¹: N/A				
	•					
Does AL request confidential treatmen	t? If so, provide exp	lanation: No				
<del>-</del>		Tier Designation: 1 2 3				
Requested effective date: 6/28/13		No. of tariff sheets: 3				
Estimated system annual revenue effec	ct: (%): N/A					
Estimated system average rate effect (						
v e		showing average rate effects on customer classes				
(residential, small commercial, large C						
Tariff schedules affected: Preliminary Statement Part VIII – GCIM and TOCs						
Service affected and changes proposed <sup>1</sup> : N/A						
Pending advice letters that revise the s	same tariff sheets:	4493				
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	S	Southern California Gas Company				
Attention: Tariff Unit	A	Attention: Sid Newsom				
505 Van Ness Ave.,		555 West 5th Street, GT14D6				
San Francisco, CA 94102		Los Angeles, CA 90013-1011				
EDTariffUnit@cpuc.ca.gov		SNewsom@semprautilities.com				
	<u>t</u>	ariffs@socalgas.com				

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

# **ATTACHMENT A**

# Advice No. 4499

(See Attached Service Lists)

# ATTACHMENT B Advice No. 4499

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 49245-G	PRELIMINARY STATEMENT, PART VIII, GAS COST INCENTIVE MECHANISM, Sheet 5	Revised 48686-G
Revised 49246-G Revised 49247-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 49165-G Revised 49084-G

LOS ANGELES, CALIFORNIA CANCELING

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

49245-G\* 49159-G

Sheet 5

Ι

# PRELIMINARY STATEMENT <u>PART VIII</u> 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 83 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, 2013, 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. <u>Tolerance</u>. 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)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 4499 \\ \text{DECISION NO.} & 06\text{-}10\text{-}029 \\ \end{array}$ 

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ISSUED BY

Lee Schavrien

Senior Vice President

**GENERAL** 

Cal. P.U.C. Sheet No.

T

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.

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Hazardous Substance Cost Recovery Account (HSCRA)	
Gas Cost Rewards and Penalties Account (GCRPA)	
Pension Balancing Account (PBA)	
Post-Retirement Benefits Other Than Pensions Balancing Account	
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(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4499 DECISION NO. 06-10-029

ISSUED BY Lee Schavrien Senior Vice President

(TO BE INSERTED BY CAL. PUC) May 29, 2013 DATE FILED Jun 28, 2013 **EFFECTIVE** RESOLUTION NO.

LOS ANGELES, CALIFORNIA CANCELING Revised

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4499 DECISION NO. 06-10-029

ISSUED BY Lee Schavrien Senior Vice President

(TO BE INSERTED BY CAL. PUC) May 29, 2013 DATE FILED Jun 28, 2013 EFFECTIVE RESOLUTION NO.

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