

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 12, 2016

Advice Letter 4906

Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

**Subject: Withdrawal of Advice Letter 4906 – Establishment of the El Nino
Response Memorandum Account (ENRMA)**

Dear Mr. van der Leeden:

Advice Letter 4906 is withdrawn as requested in your letter dated January 8, 2016.

Sincerely,

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

Edward Randolph
Director, Energy Division



Ronald van der Leeden
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.2009
Fax: 213.244.4957
RvanderLeeden@semprautilities.com

January 8, 2016

Mr. Edward F. Randolph
Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Withdrawal of SoCalGas Advice No. (AL) 4906 - Establishment of the El Nino Response Memorandum Account (ENRMA)

In accordance with GO 96.B, Section 5.3, Southern California Gas Company ("SoCalGas") hereby withdraws Advice Letter ("AL") 4906. On December 17, 2015, SoCalGas filed AL 4906 requesting authority to establish a memorandum account to track incremental costs attributable to the extraordinary El Nino storm conditions anticipated in Southern California (the "El Nino Response Memorandum Account" or "ENRMA").

On January 2, 2016, the Commission's Office of Ratepayer Advocates ("ORA"), The Utility Reform Network ("TURN"), and Southern California Generation Coalition ("SCGC") protested SoCalGas' proposed ENRMA. All parties argue that the ENRMA runs afoul of the Settlement Agreements pending in SoCalGas' General Rate Case ("GRC Settlement Agreements"). TURN and SCGC also point out that the existing Catastrophic Event Memorandum Account is available to SoCalGas for storm-response costs.

SoCalGas wishes to avoid any appearance or suggestion that it is seeking to undermine its GRC Settlement Agreements. Accordingly, SoCalGas withdraws AL 4906, thereby terminating its pending request for the ENRMA.

For informational purposes, SoCalGas did not intend to undermine its GRC Settlement Agreements when it submitted Advice Letter 4906. SoCalGas simply intended to use the ENRMA to track costs for purposes of avoiding potential retroactive ratemaking. The question of cost recovery would have been determined in a later proceeding in the event SoCalGas chose to file to seek recovery in the future, at which time SoCalGas would have had to justify recovery, including demonstrating why the costs were not already covered by the GRC Settlements.

Accordingly, for the foregoing reasons, SoCalGas respectfully withdraws Advice Letter 4906. In accordance with General Order 96-B, Section 5.3, this withdrawal letter is being submitted in the same manner and served on the same persons as AL 4906.

Sincerely,

A handwritten signature in black ink that reads "R. van der Leeden". The signature is stylized, with the first name "R" being the largest and most prominent, followed by "van der Leeden" in a cursive script.

FOR

Ronald van der Leeden
Director, Regulatory Affairs

Cc: CPUC Energy Division
Service List A.14-11-003/4
Bob Finkelstein, TURN (on behalf of TURN and SCGC)
Mark Pocta, ORA
Truman L. Burns, ORA



Ronald van der Leeden

Director

Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

Tel: 213.244.2009

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RvanderLeeden@semprautilities.com

December 17, 2015

Advice No. 4906

(U 904 G)

Public Utilities Commission of the State of California

Subject: Establishment of the El Nino Response Memorandum Account (ENRMA)

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 A.

Purpose

The purpose of this filing is to establish the El Nino Response Memorandum Account (ENRMA) to record incremental costs incurred by SoCalGas to restore gas service to affected customers in the event of storm related outages as a result of severe El Niño weather conditions not the subject of a governor-declared state of emergency.

Background

Meteorologists and other weather experts are predicting a very wet winter in Southern California, with strong El Niño conditions that can only be expected once every 15-20 years. Strong El Niños are characterized by significant amounts of rainfall in southern California. According to the National Oceanic and Atmospheric Administration, there is an 80 percent chance that the impact of El Niño will last into early spring 2016, and this could rank among the top three strongest weather events in the area since 1950.¹

While rainfall is expected to be heavy, particularly between January and March, flooding

¹ On December 1, 2015, the California Public Utilities Commission (CPUC or Commission) Safety and Enforcement Division (SED) sent a letter to SoCalGas indicating that “this year’s El Nino is expected to be among the strongest on record” and directing responses to various questions regarding SoCalGas’ preparations for the El Niño events. SoCalGas provided a response to the SED inquiry on December 17, 2015.

and mudslides could cause the greatest damage to communities, especially arriving on the heels of an unprecedented drought. The California Department of Water Resources says "the risk of catastrophic flooding increases when California is suffering the effects of a severe drought."

An El Niño winter will likely present numerous challenges for both employees and the company. SoCalGas has been planning for this scenario for several months, taken a number of steps in advance of El Niño, and is not requesting recovery for any of the costs incurred for these activities. However, these activities may not prevent all impacts to the utilities' infrastructure and ability to serve its customers. As a result, SoCalGas is requesting the establishment of a new memorandum account, the ENRMA, to record any incremental costs associated with the additional expense to provide service to customers as a result of El Niño. The ENRMA will allow SoCalGas the opportunity to recover any incremental costs found reasonable by the Commission upon review in a future formal application.

Establishment of the ENRMA

SoCalGas requests establishment of the ENRMA to record the incremental costs incurred by SoCalGas to restore gas service to customers resulting from the severe El Niño weather conditions.

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 January 6, 2016. 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 (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: snewsom@SempraUtilities.com

Effective Date

This filing is classified as Tier 2 (effective after staff approval) and is subject to Energy Division disposition. SoCalGas respectfully requests that this filing be effective on December 17, 2015, which is the date the Advice Letter is being filed.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list for A.14-11-004. Address change requests to the GO 96-B should be directed by electronic mail to tariffs@socalgas.com or call 213-244-3387. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Ronald van der Leeden
Director, Regulatory Affairs

Attachment

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) #: 4906

Subject of AL: Establishment of the El Nino Response Memorandum Account (ENRMA)

Keywords (choose from CPUC listing): Preliminary Statement; Procurement

AL filing type: Monthly Quarterly Annual One-Time Other

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: 12/17/15

No. of tariff sheets: 6

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: PS VI and TOCs

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: _____

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 Fifth 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. 4906

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 52168-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 1	Revised 51752-G
Original 52169-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, REPAIRS DEDUCTION MEMORANDUM ACCOUNT (RDMA), Sheet 1	
Revised 52170-G	TABLE OF CONTENTS	Revised 52163-G
Revised 52170.1-G	TABLE OF CONTENTS	Revised 51896-G
Revised 52171-G	TABLE OF CONTENTS	Revised 52056-G
Original 52172-G	TABLE OF CONTENTS	Revised 52056-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)
- Curtailed 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)
- Aliso Canyon Memorandum Account (ACMA)
- Energy Data Request Memorandum Account (EDRMA)
- Residential Disconnect Memorandum Account (RDMA)
- Greenhouse Gas Memorandum Account (GHGMA)
- Deductible Tax Repairs Benefits Memorandum Account (DTRBMA)
- Operational Flow Cost Memorandum Account (OFCMA)
- El Nino Response Memorandum Account (ENRMA)

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 4906
 DECISION NO.

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Dec 17, 2015
 EFFECTIVE _____
 RESOLUTION NO. _____

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS
REPAIRS DEDUCTION MEMORANDUM ACCOUNT (RDMA)

Sheet 1

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1. Purpose

The ENRMA is an interest bearing memorandum account that is recorded on SoCalGas' financial statements. The purpose of the ENRMA is to record incremental costs incurred by SoCalGas to restore gas service that was impacted by the severe El Nino weather conditions predicted by governmental agencies and scientists, including the Climate Prediction Center and the National Weather Service. The ENRMA is effective December 17, 2015.

2. Applicability

The ENRMA shall apply to gas customers except for those specifically excluded by the Commission.

3. Rates

The balance in the ENRMA will be included in gas rates upon Commission approval. See Disposition Section below.

4. Accounting Procedures

SoCalGas maintains this subaccount by making monthly entries, net of applicable FF&U, as follows:

- a) A debit entry equal to capital-related revenue requirements (i.e., depreciation, return and taxes) associated with the repair or replacement of distribution and transmission pipeline and storage facilities damaged as a result of severe El Nino weather conditions;
- b) A debit entry equal to O&M expenses associated with the restoration of gas service interrupted by severe El Nino weather conditions;
- c) A credit entry to transfer the balance to the CEMA, if the El Nino causes the Governor to declare a state of emergency;
- d) An entry to amortize the prior year's balance; and
- e) An entry equal to 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

Disposition of the balance in the ENRMA shall be addressed in a separate application or future proceeding as determined by the Commission.

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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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ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

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