

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 26, 2017

Advice Letter 5132-G

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

SUBJECT: Revisions to Rule No. 41, Utility System Operation

Dear Mr. van der Leeden:

Advice Letter 5132-G is effective as of June 2, 2017.

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

May 3, 2017

Advice No. 5132
(U 904 G)

Public Utilities Commission of the State of California

Subject: Revisions to Rule No. 41, Utility System Operation

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC) proposed revisions to its Rule No. 41, Utility System Operation, applicable throughout its service territory, as shown on Attachment A.

Purpose

SoCalGas requests authorization to revise Rule No. 41 to enable SoCalGas to enter into baseload contracts for July through September of 2017 and 2018 to support Southern System reliability during the peak summer months.

Background

In Resolution G-3477, the CPUC preauthorized SoCalGas to enter into Southern System support baseload contracts that meet a defined set of criteria. This authority is described in SoCalGas' Rule No. 41:

Should the Operational Hub deem it necessary or advisable to enter into baseload contracts for Southern System support at one or more of the Southern System receipt points, the Operational Hub shall be deemed to have made reasonable baseload purchases if: (1) the total cumulative baseload volumes at any time are less than or equal to 255,000 Dth/day; (2) the price is less than or equal to NGI's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth for the relevant baseload month(s); (3) the term is for the December - March period, or any subset of that period; and (4) the baseload contracts can only be made for one season at a time and only within the nine month period directly preceding that season. The Operational Hub shall be deemed to have made reasonable sales of such baseload gas if: (1) for baseload sales, the sale price is greater than or equal to 90% of NGI's Bidweek average for "SoCal Citygate" for the relevant baseload month(s);

and (2) for spot sales, the sale price is greater than or equal to 90% of the ICE Wtd Avg Index for the relevant trading point and trading period. This provision shall expire on March 31, 2016, unless extended by the Commission. SoCalGas may seek extension or modification of this provision by standard advice filing or application.¹

The Commission granted this authorization in Resolution G-3477 because baseload contracts "provide an efficient method to manage Southern System minimum flow requirements."² On May 25, 2016, SoCalGas filed Advice No. (AL) 4970, requesting a three-year extension of preauthorization of baseload contracts to support the Southern System, through March 31, 2019. AL 4970 was approved by disposition letter effective July 8, 2016.

On June 22, 2016, SoCalGas filed AL 4978, requesting authorization to revise Rule No. 41 to provide temporary preauthorization to enter into baseload contracts for August and September of 2016. The AL was approved by disposition letter effective July 21, 2016, which modified Rule No. 41 to include the temporary summer baseload provision as a new Section 29.

Requested Authorization

SoCalGas respectfully requests preauthorization to enter into baseload contracts for the peak Summer months of July through September for the remainder of the period approved by AL 4970, which ends March 31, 2019 and which includes the summers of 2017 and 2018. All preauthorization terms would remain the same as the terms for the Winter, with the exception that in the Summer months SoCalGas will enter into no more than 200,000 Dth/d of baseload contracts, while in the Winter SoCalGas is preauthorized to purchase up to 255,000 Dth/d. This is consistent with the temporary preauthorization for summer contracts approved by AL 4978.

SoCalGas believes that baseload contracts are likely to provide reliable flowing supplies at the Southern System at a reasonable cost. SoCalGas bases that belief on its experience purchasing supplies at the Southern System during the Summer of 2016. For example, SoCalGas purchased 200,000Dth/d of baseload supplies for August and September but relied solely on spot purchases and Backbone Transportation Service (BTS) discounts during the month of July. On average, during July supplies acquired through spot transactions were cut by approximately 5% per day and up to 34% on a single day. In contrast, during August and September supplies from baseload contracts were, on average, cut by less than 0.4% per day and never by more than 5% on a single day. Given the importance of maintaining adequate flowing supplies at the Southern System, SoCalGas would like to reduce the likelihood of supply cuts during the peak Summer months by entering into baseload contracts.

¹ SoCalGas Rule No. 41, Section 20.

² Resolution G-3477 at 18, Finding of Fact 14.

The Summer of 2016 also demonstrates that baseload contracts can be a cost-effective method to increase supply reliability. While the average minimum flow required to support the Southern System in August and September was higher than during July, the monthly cost was lower in August and September when the baseload contracts were in effect (see table 1). Additional analysis by SoCalGas also shows that up to 200,000Dth/d of baseload contracts could have been purchased for the period between July and September 2016 at little or no extra cost, compared with solely relying on spot purchases. This analysis is presented in Attachment B to this advice filing.

Table 1

	Baseload	Avg. Southern System Minimum*	Total Cost
Jul-16	No	591,000	\$1,460,000
Aug-16	Yes	652,000	\$1,144,000
Sep-16	Yes	628,000	\$1,102,000

*Cycle 3 posted minimum.

If Commission authorization is not provided prior to the start of Bidweek for any of the peak summer months, SoCalGas may be unable to enter into baseload contracts for that month. If authorization is granted, SoCalGas will analyze both operational and market conditions to determine baseload volumes for each month, subject to the price and volume constraints imposed by the Commission.

Tariff Modification

In order to implement the above proposal, SoCalGas requests that Section 20 of Rule 41 be modified as follows:

Should the Operational Hub deem it necessary or advisable to enter into baseload contracts for Southern System support at one or more of the Southern System receipt points, the Operational Hub shall be deemed to have made reasonable baseload purchases if: (1) the total cumulative baseload volumes at any time are less than or equal to 255,000 Dth/day in the months of December through March and 200,000 Dth/day in the months of July through September; (2) the price is less than or equal to NGL's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth for the relevant baseload month(s); (3) the term is for the December - March or the July - September periods, or any subset of those that periods; and (4) the baseload contracts can only be made for one season at a time and only within the nine month period directly preceding that season. The Operational Hub shall be deemed to have made reasonable sales of such baseload gas if: (1) for baseload sales, the sale price is greater than or equal to 90% of NGL's Bidweek average for "SoCal Citygate" for the relevant baseload month(s); and (2) for spot sales, the sale price is greater than or equal to 90% of the ICE Wtd Avg Index for the relevant

trading point and trading period. This provision shall expire on March 31, 2019, unless extended by the Commission. SoCalGas may seek extension or modification of this provision by standard advice filing or application.

By modifying Section 20 as proposed, both winter and summer baseload contracts will have preauthorization authority by the same Section of Rule No. 41; therefore, Section 29 on Rule No. 41 can be deleted.

Protest

Anyone may protest this AL 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 AL, which is May 23, 2017. 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 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: Ray B. Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-4957
E-Mail: ROrtiz@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 General Order (GO) 96-B. It is in compliance with Section 20 of Rule No. 41. Therefore, SoCalGas respectfully requests that this filing be approved on June 2, 2017, which is thirty (30) calendar days after the date filed.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for A.15-07-014 and A.15-06-020. Address change requests to the GO 96-B should be directed by electronic mail to tariffs@socalgas.com or call 213-244-2837. 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

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: Ray B. Ortiz

Phone #: (213) 244-3837

E-mail: ROrtiz@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) #: 5132

Subject of AL: Revisions to Rule No. 41, Utility System Operation

Keywords (choose from CPUC listing): Rules

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Resolution G-3477

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: 6/2/17

No. of tariff sheets: 7

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: Rule No. 41 – Utility System Operation 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: Ray B. Ortiz
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011
ROrtiz@semprautilities.com
Tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A
Advice No. 5132

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 53964-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 7	Revised 51676-G
Revised 53965-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 8	Revised 52598-G
Revised 53966-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 9	Revised 51678-G
Revised 53967-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 10	Revised 53840-G
Revised 53968-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 11	Revised 53472-G
Revised 53969-G	TABLE OF CONTENTS	Revised 53842-G
Revised 53970-G	TABLE OF CONTENTS	Revised 53963-G

UTILITY SYSTEM OPERATION

(Continued)

PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES (Continued)

16. Purchases or sales at prices that are outside the ranges specified in Section 13 (a) and (b) above shall nevertheless be deemed reasonable if the Operational Hub abides by the following procedure: When the Gas Control Department determines that spot purchases are necessary to meet minimum flow requirements, the Operational Hub shall monitor ICE and record the relevant price information, if available, for deliveries of gas at all relevant trading points. If volumes available on ICE meet or exceed the minimum flow requirements, transactions for the volumes offered through ICE shall be deemed reasonable. The Operational Hub may also post an offer/bid on ICE for volumes. When less than the required volumes are available on ICE, the Operational Hub shall contact gas suppliers (other than the Utility Gas Procurement Department or affiliates), request offers for the necessary supplies, and record their offers for gas delivered to the relevant trading points to ensure at least three offers from three different suppliers are available for comparison. The Operational Hub shall compare prices posted on ICE and, if applicable, prices quoted by its supplier contacts, and select the best prices available to meet the quantities required to meet minimum flow requirements. Verification that the Operational Hub has followed this procedure shall be provided to the CPUC in the Annual Compliance Report described in Section 25 below.
17. When the Gas Control Department determines that deliveries at Otay Mesa are necessary to meet minimum flow requirements, such requirements may be satisfied either through spot purchases at Otay Mesa or through the movement of supplies from Blythe to Otay Mesa. Standards and criteria for spot purchases are set forth above. Should it be necessary for the Operational Hub to move supplies from Blythe to Otay Mesa, the movement shall be deemed to be reasonable if (1) the cost of moving the supplies is less than or equal to the difference between the ICE Wtd Avg Index for the Blythe and the cost of spot gas available for purchase at Otay Mesa for the relevant flow date, or (2) if sufficient spot supplies are not available for purchase at Otay Mesa for the relevant flow date, and the movement fills some or all of the shortfall between supplies needed at Otay Mesa and supplies available for purchase at Otay Mesa.
18. Purchases and sales other than those described in Sections 14 and 15 above will not be deemed unreasonable but shall be subject to review and any requests for explanation by the CPUC Energy Division in conjunction with the Annual Compliance Report described in Section 25 below.
19. Standards, criteria and procedures set forth in Sections 13, 14, 15 and 16 apply to Operational Hub's purchases and sales as of April 1, 2009.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5132
 DECISION NO.

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED May 3, 2017
 EFFECTIVE Jun 2, 2017
 RESOLUTION NO. G-3477

UTILITY SYSTEM OPERATION

(Continued)

PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES

20. Should the Operational Hub deem it necessary or advisable to enter into baseload contracts for Southern System support at one or more of the Southern System receipt points, the Operational Hub shall be deemed to have made reasonable baseload purchases if: (1) the total cumulative baseload volumes at any time are less than or equal to 255,000 Dth/day in the months of December through March and 200,000 Dth/day in the months of July through September; (2) the price is less than or equal to NGI's Bidweek average for "Southern Cal. Bdr. Avg." plus 8.2 cents/Dth for the relevant baseload month(s); (3) the term is for the December-March or the July-September periods, or any subset of those periods; and (4) the baseload contracts can only be made for one season at a time and only within the nine month period directly preceding that season. The Operational Hub shall be deemed to have made reasonable sales of such baseload gas if: (1) for baseload sales, the sale price is greater than or equal to 90% of NGI's Bidweek average for "SoCal Citygate" for the relevant baseload month(s); and (2) for spot sales, the sale price is greater than or equal to 90% of the ICE Wtd Avg Index for the relevant trading point and trading period. This provision shall expire on March 31, 2019, unless extended by the Commission. SoCalGas may seek extension or modification of this provision by standard advice filing or application.
21. The Utility shall seek CPUC authority for any additional tools (other than system modifications that can be completed without an application under current rules) necessary to meet the Southern System minimum flow requirement through an application. Any contracts that are not obtained through an RFO process relating to already-approved tools (i.e., gas purchases, gas exchanges) will be submitted to the CPUC for approval by Advice Letter. Advice Letters seeking approval of the Operational Hub contractual arrangements shall identify the order in which contracts will be implemented to ensure system reliability and integrity at least cost.

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ACCOUNTING TREATMENT

22. The cost and revenues of Operational Hub transactions (e.g., natural gas purchases, sales, or exchanges resulting from approved contracts) that are necessary to meet minimum flow requirements shall be recorded in the System Reliability Memorandum Account (SRMA). Prospective changes to the types of the Operational Hub natural gas transactions ("tools") to meet minimum flow requirements shall be considered in conjunction with the annual Utility Customer Forum described below.

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(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5132
 DECISION NO.
 8H10

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED May 3, 2017
 EFFECTIVE Jun 2, 2017
 RESOLUTION NO. G-3477

Rule No. 41

Sheet 10

UTILITY SYSTEM OPERATION

(Continued)

CPUC REPORTING REQUIREMENTS

- 26. The Utility shall file each post-Forum report resulting from the Forum with the CPUC by Advice Letter no later than 60 days after conclusion of the relevant Forum. The Utility shall also submit any tariff changes proposed in the Forum and agreed-to by the Utility for the CPUC approval by Advice Letter no later than 60 days after conclusion of each Forum.
- 27. On October 1 of each year, the Utility shall provide a report (“Annual Compliance Report”) demonstrating that the Operational Hub’s procurement activities during the preceding twelve months ending August 31 were in compliance with the standards, criteria and procedures described in Sections 9 through 19 above. The Annual Compliance Report shall be submitted to the Energy Division by Advice Letter and shall be subject to comment or protest. Upon Energy Division review and verification of the Annual Compliance Report and the CPUC Resolution approving the Annual Compliance Report, all the transactions entered into the SRMA balance for the year in question that are found reasonable by the Energy Division shall be amortized in customer transportation rates over the following year.

TEMPORARY SETTLEMENT TERM

- 28. The Sections of this Rule italicized and followed by an asterisk (*) are temporary and will end upon the expiration of the term in the settlement approved by D.16-12-015 and modified by D.17-03-020. Specifically, that settlement term will conclude upon the earlier of: (1) any superseding decision or order by the Commission, (2) return of Aliso Canyon to at least 450 MMcfd of injection capacity and 1,395 MMcfd of withdrawal capacity, or (3) November 30, 2017.

SPECIAL CONDITION

- 29. The Utility System Operator shall communicate with the California Independent System Operator (CAISO) and other Electric Grid Operators on an as-needed basis to help maintain the reliability of the Utility’s natural gas system and the electric grid. Such communications may result in operational changes by the Utility System Operator and changes in electric grid operations and electric generation dispatch order by CAISO and other grid operators. Such operational communications shall not be considered curtailments of natural gas service unless Utility expressly curtails service pursuant to Rule No. 23. SoCalGas and the Utility System Operator are not responsible for electric grid operations or reliability, but will take electric grid reliability into consideration, to the extent feasible, when making operational decisions.

(Continued)

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 5132
DECISION NO.

ISSUED BY
Dan Skopec
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
DATE FILED May 3, 2017
EFFECTIVE Jun 2, 2017
RESOLUTION NO. G-3477

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Rule No. 41
UTILITY SYSTEM OPERATION

Sheet 11

(Continued)

SYSTEM OPERATOR GAS ACCOUNT SUPPORT

30. The Utility System Operator's Operational Hub shall support cashout activity described in the California Producer Operational Balancing Agreement (CPOBA) and resolve imbalances derived from pipeline Operational Balancing Agreements (OBA) through the purchase or sale of gas at the SoCal City Gate. The balancing of this activity is described in the Utilities Preliminary Statement.

(TO BE INSERTED BY UTILITY)

ADVICE LETTER NO. 5132
DECISION NO.

11H6

ISSUED BY

Dan Skopec
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED May 3, 2017
EFFECTIVE Jun 2, 2017
RESOLUTION NO. G-3477

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5132
 DECISION NO.
 2H6

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED May 3, 2017
 EFFECTIVE Jun 2, 2017
 RESOLUTION NO. G-3477

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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)

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Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
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ATTACHMENT B

Advice No. 5132

Analysis

