PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

September 6, 2017



**Advice Letter 5166** 

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

# Subject: Establishment of the NGLAPMA and NGLAPBA, and Modification of the NERBA, Pursuant to D.17-06-015

Dear Mr. van der Leeden:

Advice Letter 5166 is effective as of July 17, 2017.

Sincerely,

Edward Randoph

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

July 17, 2017

Advice No. 5166 (U 904G)

Public Utilities Commission of the State of California

# Subject: Establishment of the Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA) and Natural Gas Leak Abatement Program Balancing Account (NGLAPBA), and Modification of the New Environmental Regulation Balancing Account (NERBA), Pursuant to Decision (D.) 17-06-015

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) revisions to its tariff schedules, applicable throughout its service territory, as shown on Attachment A.

# <u>Purpose</u>

This filing establishes SoCalGas' Preliminary Statement Part V, Balancing Accounts NGLAPBA and SoCalGas' Preliminary Statement Part VI, Memorandum Accounts NGLAPMA. This filing also revises SoCalGas' Preliminary Statement, Part V, Balancing Accounts NERBA.

# **Background**

On January 22, 2015, the CPUC issued Rulemaking (R.) 15-01-008 to implement provisions of Senate Bill (SB) 1371. Phase I of R.15-01-008 was established to specifically address the overall policies and guidelines for a natural gas leak abatement program consistent with SB 1371 and included the following program development activities: 1) information gathering, measurement, and best practices; 2) targets, compliance, and reporting; and 3) training and enforcement. On June 15, 2017, the Commission adopted D.17-06-015 (Decision) which, among other things, directed SoCalGas to file a Tier 1 Advice Letter to establish a sub-account in their already

existing NERBA for incremental Natural Gas Leak Abatement Program expenditures.<sup>1</sup> The Decision also directed SoCalGas to file a Tier 1 Advice Letter seeking the establishment of a memorandum account to track incremental administrative costs associated with the Natural Gas Leak Abatement Program expenditures.<sup>2</sup> Lastly, the Decision directed SoCalGas to file a Tier 1 Advice Letter to create a new Natural Gas Leak Abatement Program one-way balancing account to track costs of Pilot and Research and Development (R&D) activities.<sup>3</sup>

# Proposed Modifications of SoCalGas' Preliminary Statements:

Pursuant to D.17-06-015, SoCalGas proposes to establish the NGLAPMA and NGLAPBA, as well as modify the NERBA, as described below. The proposed new and modified preliminary statements are included as Attachment A.

- <u>Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)</u> The NGLAPMA will record the incremental administrative costs associated with implementation of the Natural Gas Leak Abatement Program. The balance in the NGLAPMA will be addressed in SoCalGas' next General Rate Case or other applicable proceeding.
- <u>Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)</u> The NGLAPBA is a one-way balancing account which will record the difference between the actual incremental costs and corresponding authorized revenue requirement associated with Pilot Projects and R&D activities approved by the Commission. Incremental costs in excess of authorized levels are not recovered from ratepayers and accordingly will not be recorded in the NGLAPBA.
- <u>New Environmental Regulation Balance Account (NERBA)</u> The NERBA is revised to include the Natural Gas Leak Abatement Program (NGLAP) Subaccount. The NGLAP Subaccount will record the difference between the actual incremental costs and corresponding authorized revenue requirement associated with the implementation of the Best Practices of the Natural Gas Leak Abatement Program approved in D.17-06-015.

Pursuant to D.17-06-015, the 2018 and 2019 revenue requirement, including the corresponding allocation methodology, for the implementation of the Best Practices, Pilot Projects and R&D activities of the Natural Gas Leak Abatement Program will be proposed in Tier 3 Advice Letter submitted to the Commission. If a Resolution on the Tier 3 Advice Letter is not approved in time for incorporation of the revenue requirements in rates effective January 1, 2018, SoCalGas shall submit a supplemental Advice Letter within 60 days of Resolution approval with the revenue requirements grossed-up to recover 2018's authorized amount. The revenue requirements approved

<sup>&</sup>lt;sup>1</sup> D.17-06-015 at p. 161, Ordering Paragraph (OP) 7.

<sup>&</sup>lt;sup>2</sup> D.17-06-015 at p. 161, OP 8.

<sup>&</sup>lt;sup>3</sup> D.17-06-015 at p. 161, OP 9.

will be carried forward in subsequent years until addressed in SoCalGas' next GRC or other applicable proceeding.

# 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 August 6, 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 (<u>EDTariffUnit@cpuc.ca.gov</u>). A copy of the protest shall 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: 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 1 (effective pending staff approval) pursuant to General Order (GO) 96-B. In addition, SoCalGas respectfully requests that the Preliminary Statements filed herein become effective for service on July 17, 2017.

# <u>Notice</u>

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.15-01-008. Address change requests to the GO 96-B service list should be directed by electronic mail to <u>tariffs@socalgas.com</u> 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 <u>Process Office@cpuc.ca.gov</u>.

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. SOL	JTHERN CALIFO	RNIA GAS COMPANY (U 904G)
Utility type:	Contact Person: 1	Ray B. Ortiz
$\Box$ ELC $\Box$ GAS	Phone #: (213) 24	44-3837
PLC   HEAT   WATER	E-mail: <u>ROrtiz@se</u>	mprautilities.com
EXPLANATION OF UTILITY T	YPE	(Date Filed/ Received Stamp by CPUC)
ELC = Electric GAS = Gas		
PLC = Pipeline HEAT = Heat V	VATER = Water	
Advice Letter (AL) #: 5166		
Subject of AL: Establishment of the N	atural Gas Leak Ab	atement Program Memorandum Account
•		Balancing Account (NGLAPBA), and Modification
		(NERBA), Pursuant to Decision (D.) 17-06-015
Keywords (choose from CPUC listing):	0	
AL filing type:  Monthly Quarter		
If AL filed in compliance with a Comm	•	
D.17-06-015		
	ad AI 2 If as identify	futhe prior AI. No
Does AL replace a withdrawn or rejected		· · ·
Summarize differences between the AI	and the prior with	drawn or rejected AL <sup>1</sup> : <u>N/A</u>
Does AL request confidential treatmen	t? If so, provide exp	lanation: <u>No</u>
Resolution Required? 🗌 Yes 🖂 No		Tier Designation: 🛛 1 🗌 2 🔲 3
Requested effective date: <u>7/17/17</u>		No. of tariff sheets: <u>0</u>
Estimated system annual revenue effective	ct: (%): <u>N/A</u>	
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: <u>N/A</u>		
Service affected and changes proposed <sup>1</sup> : N/A		
Pending advice letters that revise the s	same tariff sheets:	N/A
Protests and all other correspondence this filing, unless otherwise authorize		are due no later than 20 days after the date of on, and shall be sent to:
CPUC, Energy Division	•	Southern California Gas Company
Attention: Tariff Unit	A	Attention: Ray B. Ortiz
505 Van Ness Ave.,		555 West 5 <sup>th</sup> Street, GT14D6
San Francisco, CA 94102		Los Angeles, CA 90013-1011
EDTariffUnit@cpuc.ca.gov		ROrtiz@semprautilities.com
	<u></u>	<u> Fariffs@socalgas.com</u>

<sup>&</sup>lt;sup>1</sup> Discuss in AL if more space is needed.

#### ATTACHMENT A Advice No. 5166

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 54130-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, DESCRIPTION AND LISTING OF BALANCING ACCOUNTS, Sheet 2	Original 52939.1-G*
Revised 54131-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NEW ENVIRONMENTAL REGULATION BALANCING ACCOUNT (NERBA), Sheet 1	Revised 52945-G
Revised 54132-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NEW ENVIRONMENTAL REGULATION BALANCING ACCOUNT (NERBA), Sheet 3	Original 52947-G
Original 54133-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NATURAL GAS LEAK ABATEMENT PROGRAM BALANCING ACCOUNT (NGLAPBA), Sheet 1	
Original 54134-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, NATURAL GAS LEAK ABATEMENT PROGRAM BALANCING ACCOUNT (NGLAPBA), Sheet 2	
Revised 54135-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 2	Revised 53780-G
Original 54136-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, NATURAL GAS LEAK ABATEMENT PROGRAM MEMORANDUM ACCOUNT, (NGLAPMA), Sheet 1	
Revised 54137-G Revised 54138-G Revised 54139-G Revised 54140-G	TABLE OF CONTENTS TABLE OF CONTENTS TABLE OF CONTENTS TABLE OF CONTENTS	Revised 54110-G Revised 53977-G Revised 53785-G Revised 53612-G

#### PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS DESCRIPTION AND LISTING OF BALANCING ACCOUNTS

Sheet 2

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(Continued)

#### B. <u>LISTING OF BALANCING ACCOUNTS</u> (Continued)

Distributed Energy Resources Services Balancing Account (DERSBA Storage Integrity Management Program Balancing Account (SIMPBA) Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)

ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) SUBMITTED Jul 17, 2017 EFFECTIVE Jul 17, 2017 RESOLUTION NO.

54131-G 52945-G CAL. P.U.C. SHEET NO.

#### PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS NEW ENVIRONMENTAL REGULATION BALANCING ACCOUNT (NERBA)

Sheet 1

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#### 1. Purpose

The NERBA is an interest bearing two-way balancing account recorded on SoCalGas' financial statements. Pursuant to Decision (D.) 13-05-010, Test-Year (TY) 2012 General Rate Case (GRC), effective January 1, 2012, the NERBA will record the difference between actual costs and authorized costs in rates associated with new greenhouse gas (GHG) requirements. Per D.16-06-054, TY 2016 GRC, the NERBA is authorized for the three-year GRC period ending December 31, 2018 or until the effective implementation date of SoCalGas' next GRC. In addition, pursuant to D.16-06-054, the NERBA is expanded to include subaccounts to record costs associated with the Municipal Separate Storm Systems (MS4) compliance requirements and Leak Detection and Repair (LDAR) as detailed below. The NERBA is further expanded to establish the Natural Gas Leak Abatement Program (NGLAP) Subaccount to record the difference between actual incremental costs and corresponding authorized revenue requirement associated with the implementation of the Best Practices of the Natural Gas Leak Abatement Program approved in D.17-06-015.

The NERBA shall consist of five subaccounts:

- 1) AB 32 Admin Fees Subaccount records actual administrative fees paid to the California Air Resources Board (CARB) and the associated authorized cost in base rates;
- 2) Subpart W Subaccount records operating and maintenance (O&M) and capital-related costs associated with the monitoring and reporting requirements of Subpart W to the GHG Mandatory Reporting Rule issued by the US Environmental Protection Agency and the associated authorized costs in base rates;
- 3) MS4 Compliance Subaccount records costs associated with compliance with MS4 local ordinance requirements which addresses the cleanliness of SoCalGas' parking lots and potential storm water runoff and discharge from company facilities; and
- 4) LDAR Subaccount records costs associated with compliance with the rules and procedures under Senate Bill 1371 which governs the natural gas leakage abatement for commissionregulated gas pipeline facilities that are intrastate transmission and distribution lines in order to reduce emissions of natural gas pursuant to the California Global Warming Solutions Act of 2006.
- 5) NGLAP Subaccount records the costs associated with implementation of Best Practices of the Natural Gas Leak Abatement Program approved in D.17-06-015.

#### 2. Applicability

The NERBA shall apply to gas customers.

#### 3. Rates

The balance in the NERBA will be included in gas transportation rates.

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ISSUED BY **Dan Skopec** Vice President **Regulatory Affairs** 

(TO BE I	NSERTED BY CAL. PUC)
DATE FILED	Jul 17, 2017
EFFECTIVE	Jul 17, 2017
<b>RESOLUTION N</b>	10.

52947-G CAL. P.U.C. SHEET NO.

# PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS Sheet 3 NEW ENVIRONMENTAL REGULATION BALANCING ACCOUNT (NERBA) (Continued) 7. LDAR Subaccount - Accounting Procedures SoCalGas maintains this account by making monthly entries, net of applicable FF&U, as follows: a) A debit entry to record O&M costs related to complying with LDAR regulations, b) A debit entry to record capital-related costs (depreciation, return, and income taxes) related to compliance with LDAR regulations, c) A credit entry equal to one-twelfth of the cost authorized in rates related to SoCalGas' LDAR compliance costs, 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. 8. NGLAP Subaccount - Accounting Procedures Ν SoCalGas maintains this account by making monthly entries, net of applicable FF&U, as follows: a) A debit entry to record incremental O&M costs associated with the implementation of the Best Practices of the Natural Leak Abatement Program adopted in D.17-06-015, b) A debit entry to record the incremental capital-related costs (depreciation, return, and income taxes) associated with the implementation of the Best Practices of the Natural Leak Abatement Program adopted in D.17-06-015, c) A credit entry equal to one-twelfth of the cost authorized in rates approved in the October Tier 3 advice letter filing establishing the authorized revenue requirements associated with the implementation of the Best Practices of the Natural Gas Leak Abatement Program, 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. Ν 9. Disposition In each annual October regulatory account balance update filing, SoCalGas will amortize the projected vear-end balance effective January 1 of the following year. The projected year-end balance in the AB 32 Admin Fees Subaccount will be allocated on an Equal Cents Per Therm (ECPT) basis consistent with the allocation for the CARB fee cost recovery. The projected year-end balance in the remaining subaccounts will be allocated on an Equal Percent of Authorized Margin (EPAM) basis consistent with the allocation of current base margin pursuant to D.13-05-010. Pursuant to D.17-06-015, SoCalGas Ν will file a Tier 3 advice letter to establish the 2018 and 2019 revenue requirement for the NGLAP Subaccount, and proposed allocation methodology, for the implementation of the Best Practices of the Natural Gas Leak Abatement Program. The revenue requirement will be carried forward in subsequent

ISSUED BY **Dan Skopec** Vice President **Regulatory Affairs** 

years until addressed in SoCalGas' next GRC or other applicable proceeding.

#### CAL. P.U.C. SHEET NO. 54133-G CAL. P.U.C. SHEET NO.

### PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS Sheet 1 NATURAL GAS LEAK ABATEMENT PROGRAM BALANCING ACCOUNT (NGLAPBA)

#### 1. Purpose

The NGLAPBA is an interest bearing one-way balancing account recorded on SoCalGas' financial statements. Pursuant to Decision (D.) 17-06-015, Decision Approving the Natural Gas Leak Abatement Program Consistent with Senate Bill (SB) 1371, the NGLAPBA will record the difference between actual incremental costs and corresponding authorized revenue requirement associated with Pilot Projects and Research and Development (R&D) activities approved by the Commission.

#### 2. Applicability

The NGLAPBA shall apply to gas customers.

#### 3. <u>Rates</u>

The balance in the NGLAPBA will be included in gas transportation rates.

#### 4. Accounting Procedures

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

- a) A debit entry to record the incremental O&M costs of Pilot Projects and R&D activities approved by the Commission,
- b) A debit entry to record the incremental capital-related costs (depreciation, return, and income taxes) of Pilot Projects and R&D activities approved by the Commission,
- c) A credit entry equal to one-twelfth of the cost authorized in rates related to the Pilot Projects and R&D activities approved the Commission,
- 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.

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ISSUED BY Dan Skopec Vice President Regulatory Affairs

 $\begin{array}{c} (\text{TO BE INSERTED BY CAL. PUC}) \\ \text{DATE FILED} & \underline{Jul \ 17, \ 2017} \\ \text{EFFECTIVE} & \underline{Jul \ 17, \ 2017} \\ \text{RESOLUTION NO.} \end{array}$ 

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#### CAL. P.U.C. SHEET NO. 54134-G CAL. P.U.C. SHEET NO.

# PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS Sheet 2 NATURAL GAS LEAK ABATEMENT PROGRAM BALANCING ACCOUNT (NGLAPBA)

#### (Continued)

#### 5. Disposition

Pursuant to D.17-06-015, SoCalGas will file a Tier 3 advice letter to establish the 2018 and 2019 revenue requirement, and corresponding allocation methodology, for the implementation of the Pilot Projects and R&D activities of the Natural Gas Leak Abatement Program. The revenue requirement will be carried forward in subsequent years until addressed in SoCalGas' next GRC or other applicable proceeding.

In each annual October regulatory account balance update filing, SoCalGas will amortize the projected year-end balance effective January 1 of the following year. Pilot Project and R&D expenses are limited to the annual authorized revenue requirement approved by the Commission and any overspending of expenses (i.e., actual revenue requirements) may not be recovered from ratepayers. Shareholders absorb the balance if actual Pilot Project and R&D revenue requirements exceed authorized levels.

ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) DATE FILED Jul 17, 2017 EFFECTIVE Jul 17, 2017 RESOLUTION NO.

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# PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS Sheet 2 DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS Sheet 2

(Continued)

#### B. LISTING OF MEMORANDUM ACCOUNTS (Continued)

Pipeline Safety Enhancement Plan – Phase 2 Memorandum Account (PSEP-P2MA) Officer Compensation Memorandum Account (OCMA) Tax Memorandum Account (TMA) Winter Demand Response Memorandum Account (WDRMA) System Operator Gas Account (SOGA) Avoided Cost Calculator Update Memorandum Account (ACCUMA) Injection Enhancement Cost Memorandum Account (IECMA) Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)

ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) DATE FILED Jul 17, 2017 EFFECTIVE Jul 17, 2017 RESOLUTION NO. 1.

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#### CAL. P.U.C. SHEET NO. 54136-G CAL. P.U.C. SHEET NO.

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS       Sheet 1       N         NATURAL GAS LEAK ABATEMENT PROGRAM MEMORANDUM ACCOUNT       N         (NGLAPMA)       N
Purpose N
The NGLAPMA is an interest-bearing account recorded on SoCalGas' financial statements. Pursuant to Decision (D.) 17-06-015, Decision Approving the Natural Gas Leak Abatement Program Consistent with Senate Bill (SB) 1371, the NGLAPMA will record the incremental administrative costs associated with implementation of the Natural Gas Leak Abatement Program.
Applicability
The NGLAPMA shall apply to gas customers.
Rates
See Disposition Section.
Accounting Procedures
SoCalGas maintains this account by making monthly entries, net of applicable FF&U, as follows:
<ul> <li>a) A debit entry to record the incremental O&amp;M administrative costs associated with the implementation of the Natural Gas Leak Abatement Program,</li> <li>b) An entry to amortize the prior year's balance as authorized by the Commission, and</li> <li>c) 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.</li> </ul>
Disposition
The balance in the NGLAPMA will be addressed in SoCalGas' next GRC or other applicable proceeding.

ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) SUBMITTED Jul 17, 2017 EFFECTIVE Jul 17, 2017 RESOLUTION NO.

#### TABLE OF CONTENTS

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.

#### **GENERAL**

Cal. P.U.C. Sheet No.

Title Page	40864-G
Table of ContentsGeneral and Preliminary Statement 54137-G,54138-G,54139-G	
Table of ContentsService Area Maps and Descriptions	
Table of ContentsRate Schedules	
Table of ContentsList of Cities and Communities Served	52484-G
Table of ContentsList of Contracts and Deviations	52484-G
Table of ContentsRules	,53969-G
Table of ContentsSample Forms 53958-G,53707-G,51537-G,53998-G,52291-G	,52292-G
PRELIMINARY STATEMENT	
Part I General Service Information 45597-G,24332-G,24333-G,24334-G	,48970-G
Part II Summary of Rates and Charges 54082-G,54083-G,54084-G,53575-G,53576-G	54085-G
54077-G,46431-G,46432-G,53561-G,54086-G,54087-G,54088-G	,53581-G
Part III Cost Allocation and Revenue Requirement 53582-G,50447-G	,53583-G
Part IV Income Tax Component of Contributions and Advances 52273-G	,24354-G
Part V Balancing Accounts	
Description and Listing of Balancing Accounts 52939-G	6,54130-G T
Purchased Gas Account (PGA) 52769-G	i,53254-G
Core Fixed Cost Account (CFCA) 53433-G,53434-G,53834-G	,53436-G
Noncore Fixed Cost Account (NFCA) 53255-G,53835-G	,53836-G
Enhanced Oil Recovery Account (EORA)	
Noncore Storage Balancing Account (NSBA) 52886-G	
California Alternate Rates for Energy Account (CAREA) 45882-G	
Hazardous Substance Cost Recovery Account (HSCRA) 40875-G, 40876-G	
Gas Cost Rewards and Penalties Account (GCRPA)	
Pension Balancing Account (PBA) 52940-G	
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA) . 52942-G	
Research Development and Demonstration Surcharge Account (RDDGSA)	
Demand Side Management Balancing Account (DSMBA)45194-G	
Direct Assistance Program Balancing Account (DAPBA)	
Integrated Transmission Balancing Account (ITBA)	.49313-G

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5166 DECISION NO. 17-06-015 1H9 (Continued)

ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) DATE FILED Jul 17, 2017 EFFECTIVE Jul 17, 2017 RESOLUTION NO.

#### TABLE OF CONTENTS

#### (Continued)

#### PRELIMINARY STATEMENT (Continued)

Part V Balancing Accounts (Continued)

art v Balancing Accounts (Continued)	
Compressor Station Fuel and Power Balancing Account (CFPBA) 5294	44-G
Distribution Integrity Management Program Balancing Account (DIMPBA) 493	14-G
Rewards and Penalties Balancing Account (RPBA) 49315-G,493	16-G
On-Bill Financing Balancing Account (OBFBA)	95-G
Company Use Fuel for Load Balancing Account (CUFLBA) 452'	
Backbone Transmission Balancing Account (BTBA)	
Advanced Metering Infrastructure Balancing Account (AMIBA)	
53974-G.539	
New Environmental Regulation Balancing Account (NERBA) ) 54131-G,52946-G,5413	
Transmission Integrity Management Program Balancing Account (TIMPBA)	
Post-2011 Distribution Integrity Management Program	-0-U
Balancing Account (Post-2011 DIMPBA)	40 C
e (	
Compression Services Balancing Account (CSBA)	
Biogas Conditioning/Upgrading Services Balancing Account (BCSBA)	
Master Meter Balancing Account (MMBA)	36-G
Safety Enhancement Capital Cost Balancing Account (SECCBA)	
Safety Enhancement Expense Balancing Account (SEEBA)	88-G
Greenhouse Gas Balancing Account (GHGBA)	
Advanced Meter Opt-Out Program Balancing Account (AMOPBA)51904-G,5190	05-G
Low-Carbon Fuel Standard Balancing Account (LCFSBA)	64-G
Biomethane Cost Incentive Program Balancing Account (BCIPBA)	10-G
Distributed Energy Resources Services Balancing Account (DERSSBA)	64-G
Storage Integrity Management Program Balancing Account (SIMPBA)	
Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)54133-G,5413	
rt VI Memorandum Accounts	
Description and Listing of Memorandum Accounts 53089-G,541	35-G
PCB Expense Account (PCBEA) 493	17-G
Research Development and Demonstration Expense Account (RDDEA) 52952-G,529	
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 (VNDCMA)	
100	
Research Royalty Memorandum Account ( $RRM\Lambda$ ) 520	
Research Royalty Memorandum Account (RRMA)	
Intervenor Award Memorandum Account (IAMA) 409	04-G
	04-G 05-G

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Dan Skopec
Vice President
<b>Regulatory Affairs</b>

(TO BE II	NSERTED BY CAL. PUC)
DATE FILED	Jul 17, 2017
EFFECTIVE	Jul 17, 2017
RESOLUTION N	10.

#### TABLE OF CONTENTS

#### (Continued)

#### PRELIMINARY STATEMENT (Continued)

VI Memorandum Accounts (Continued)	
FERC Settlement Proceeds Memorandum Account (FSPMA)	45756-G
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 Project 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 (INCATMA)	
Energy Savings Assistance Programs Memorandum Account (INDATIMA)	
General Rate Case Memorandum Account (GRCMA)	
Pipeline Safety and Reliability Memorandum Account (ORCMA)	
Aliso Canyon Memorandum Account (ACMA)	
Advanced Meter Opt-Out Program Memorandum Account (AMOPMA)	
Energy Data Request Memorandum Account (EDRMA)	
Residential Disconnect Memorandum Account (EDKMA)	
Greenhouse Gas Memorandum Account (GHGMA)	
General Rate Case Memorandum Account (OHOMA)	
Operational Flow Cost Memorandum Account (OFCMA)	
Deductible Tax Repairs Benefits Memorandum Account (DTRBMA)	
Aliso Canyon Revenue and Cost Memorandum Account (ACRCMA)	
Assembly Bill 802 Memorandum Account (AB802MA)	
Marketing, Education and Outreach Memorandum Account (MEOMA)	
Emergency Energy Savings Assistance Program Memorandum Account (EESAP	
Pipeline Safety Enhancement Plan – Phase 2 Memorandum Account (PSEP-P2M	
Officer Compensation Memorandum Account (OCMA)	
Tax Memorandum Account (TMA)	
Winter Demand Response Memorandum Account (WDRMA)	
System Operator Gas Account (SOGA)	
Avoided Cost Calculator Update Memorandum Account (ACCUMA)	
Injection Enhancement Cost Memorandum Account (IECMA)	
Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)	54136-G

(Continued)

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DATE FILED	Jul 17, 2017	
EFFECTIVE	Jul 17, 2017	
RESOLUTION NO.		

53612-G

# TABLE OF CONTENTS

#### (Continued)

#### PRELIMINARY STATEMENT (Continued)

Part VII Tracking Accounts49865-GDescription and Listing of Tracking Accounts49865-GOther Hazardous Substance Tracking Account (OHSTA)40921-GVernon Revenue Tracking Account (VRTA)40926-GMontebello True-Up Tracking Account (MTTA)40927-GNative Gas Tracking Account (NGTA)42598-GCompression Services Tracking Account (CSTA)49857-G
Biogas Conditioning/Upgrading Services Tracking Account (BCSTA)
Part VIII Gas Cost Incentive Mechanism (GCIM) 45890-G,45891-G,42774-G,45892-G 51525-G,42777-G
Part IX Hazardous Substances Mechanism (HSM) 48973-G,26200-G,26201-G
Part XI Performance Based Regulation (PBR)
Part XII Gain/Loss On Sale Mechanism 42134-G,42135-G,42136-G,42137-G,42138-G,42138.1-G
Part XIII Native Gas Program Mechanism (NGPM)
Part XIV Cost of Capital Mechanism (CCM) 49802-G

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