PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

REVISED



January 11, 2018

Advice Letter 5222-A

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

Subject: Supplement – Emergency Residential Customer Protections for October Wildfire Victims

Dear Mr. van der Leeden:

Advice Letter 5222-A is effective as of October 9, 2017.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Randofah



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

December 27, 2017

Advice No. 5222-A (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Supplement - Emergency Residential Customer Protections for October Wildfire Victims

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC): (1) emergency residential customer protections for October wildfire victims; and (2) revisions to its tariff schedules, applicable throughout its service territory, as shown on Attachment A. Pursuant to a November 28, 2017 letter from Timothy Sullivan, Executive Director of the CPUC (Executive Director) directing SoCalGas to file a Tier 2 Advice Letter addressing non-residential customers of the October 2017 wildfires, SoCalGas files this supplement to clarify that there were not any non-residential customers impacted.

Purpose

This supplemental filing replaces in its entirety Advice Letter No. (AL) 5222, Emergency Residential Customer Protections for October Wildfire Victims, filed on November 27, 2017. This filing provides emergency residential customer protections for October wildfire victims, as directed by the Commission in Resolution (Res.) M-4833 and clarifies that non-residential customers were not impacted. This filing also establishes within SoCalGas' Preliminary Statement Part VI., Regulatory Accounts – Memorandum Accounts, the Wildfires Customer Protections Memorandum Account (WCPMA).

Background

On November 9, 2017, the Commission adopted Res. M-4833. The Resolution was issued in response to Governor Edmund G. Brown, Jr.'s proclamation of a state of emergency due to the October 2017 wildfires, which affected the California counties of Butte, Lake, Mendocino, Napa, Nevada, Orange, Solano, Sonoma, and Yuba. Res. M-4833 notes that on October 9, 2017, the Canyon Fire¹ began burning in Southern

¹ While Res. M-4833 refers to the "Canyon Fire," the fire that began on October 9, 2017 in Orange

California's Orange County, causing evacuations and damage to critical utility infrastructure. This fire occurred within SoCalGas' service territory, and affected SoCalGas customers. While smaller in scale than the fires in Northern California, which in some cases impacted entire counties, the Canyon Fire's evacuation zone covered a small area within Orange County and consisted of approximately 8,200 facilities with gas service, of which around 55 structures were damaged with around an additional 25 structures destroyed.

Res. M-4833 directs SoCalGas to take all reasonable and necessary actions to implement the emergency residential customer protections adopted in the resolution to support the victims of the Canyon Fire, and to file a Tier 2 AL with the Commission's Energy Division to implement the ordering paragraphs of the resolution and modify its tariffs, as necessary. SoCalGas was also directed to establish the WCPMA to track incremental costs associated with complying with the resolution.

Canyon Fire Impact Area and Eligibility

The Canyon Fire began on October 9, 2017, and impacted communities in the cities of Anaheim, Orange, and Tustin in Orange County, CA. The evacuation zone established by the local officials included approximately 8,200 facilities with gas service, of which about 55 structures were damaged and an additional 25 structures destroyed. To date, approximately 25 SoCalGas residential customers are known to have had their service disrupted either as a result of the damage or for precautionary reasons. There are not any known non-residential customers impacted, and therefore the customer protections will apply to residential customers only.

Customers eligible for the wildfire residential customer protections are those directly impacted by the fires and identified as such by SoCalGas or who have self-reported as being impacted. Directly impacted customers would include those without gas service or those needing to re-locate (either temporarily or permanently) due to fire damage. Due to limited information on the impact to SoCalGas customers, SoCalGas will extend the protections only to directly impacted customers.

Description of Adopted Consumer Protections

In the following section, SoCalGas describes each of the residential customer protections identified in Res. M-4833. Unless otherwise noted, each of these residential customer protections are effective through November 9, 2018.

Deposit Requirements

Res. M-4833 directs SoCalGas to waive deposit requirements for affected wildfire residents seeking to reestablish service. Customers with a satisfactory credit rating are already not required to pay a deposit to SoCalGas. Any deposit that would otherwise be

County, California and is formally known as the "Canon Fire 2." Consistent with Res. M-4833, this AL will refer to the "Canyon Fire."

collected for a new Turn-On will be waived one time per affected customer after the initial fire-related closing. The customer will not need to indicate hardship to be eligible. SoCalGas will waive the deposit requirement for eligible customers requesting to reestablish service through November 9, 2018, at either the same or a new facility.

Move-ins and Move-outs

Res. M-4833 directs SoCalGas to initiate best efforts to expedite move-in and move-outs to support Californians returning to their homes and establishing service in new locations, and to ensure that utility staff monitor and track the time from when service requests are submitted to the utility to when services are provided to residential customers. When eligible customers notify SoCalGas that their home has been destroyed or seriously damaged, a close order will be issued to stop the customer's billing as of the date of the fire. If the customer advises SoCalGas that they are relocating to another facility due to the damage to their home, SoCalGas will make every attempt to have service available to the customer on the requested day.

Estimated Bills

Res. M-4833 directs SoCalGas to recalibrate the approach for estimating energy usage to account for reduced consumption during the period of time the home or unit was unoccupied as a result of the wildfire. SoCalGas uses reads collected by our advanced meter infrastructure to bill most customers in our region. The advanced meter infrastructure was not impacted by the fire and customers with communicating devices will be billed using the actual reads from the meter.

Disconnection Charges

Res. M-4833 directs SoCalGas to identify the premises of affected customers that are not capable of receiving utility services and discontinue billing these premises without assessing a disconnection charge. SoCalGas does not currently charge a disconnect charge. However, eligible customers disconnected due the Canyon Fire will not be charged a reconnection charge, nor will a deposit be required, through November 9, 2018.

Monthly Access or Minimum Charges

Res. M-4833 directs SoCalGas to prorate any monthly access charge or minimum charges for affected customers typically assessed so that no customer shall bear any of these costs for the time period after the customer's home was rendered unserviceable by the fire. When a residential facility is rendered uninhabitable, no customer fees are charged. A closing bill is rendered as of the effective date of the fire.

Payment Plans

Res. M-4833 directs SoCalGas to implement the following payment plan options for affected customers:

- For affected customers who have prior arrearages and have lost their homes or have been displaced, and are seeking to establish service in a new residence, offer a payment plan with an initial payment of no greater than 20 percent of the amount due, and with equal installments for the remainder of not less than twelve billing cycles.
- For affected customers who currently have service but go into arrearage after
 October 17, 2017, offer a payment plan with an initial payment of no greater than 20
 percent of the amount due, and with equal installments for the remainder of not less
 than eight billing cycles.
- A customer who is offered a payment plan shall not be precluded from paying off an arrearage more quickly.

All closing bills for eligible customers will be reviewed for write-off by SoCalGas' billing department. If there is an existing deposit on the account, it will be fully refunded after the closing bill is forgiven. In SoCalGas' situation with the Canyon Fire, all eligible customers will have had their accounts closed before October 17, 2017, so arrearages after that date are not included in the residential customer protections.

Customer Disconnections

Res. M-4833 directs SoCalGas to suspend disconnection for non-payment and associated fees for affected customers, waive the deposit and late fee requirements for affected customers who pay their utility bills late, and not report late payments by residential customers, who are eligible for these protections, to credit reporting agencies or to other such services. Eligible customers will have any collection activity suspended. There is no current process at SoCalGas for residential customers to be charged a late fee, nor does SoCalGas report active accounts to credit report agencies or to other such services. Eligible customer accounts will not be reviewed for late pay deposits.

Low-Income Customer Protections

The following section provides information related to Res. M-4833 requirements relating to low-income customer protections.

 Freeze all standard and high-usage reviews for CARE program eligibility in impacted counties until at least the end of the year, and potentially longer as warranted CARE customers directly affected by the Canyon Fire will not be subject to eligibility verification until March 31, 2018.

Contact all Community Outreach Contractors, the community based organizations
who assist in enrolling hard-to-reach low-income customers into CARE, in impacted
counties to help better inform customers of these eligibility changes

SoCalGas works with 40 different Community-Based Organizations (CBOs) and outreach agencies which are located throughout the SoCalGas service area and employ various types of outreach strategies, such as local community event participation, walk-in enrollment, and program material distribution to enroll customers. In addition to canvassers, CBOs and Faith-Based Organizations (FBOs) constitute a key component of the grassroots tactics that SoCalGas will employ to reach our impacted customers. These organizations serve as trusted sources of information on SoCalGas' Customer Assistance Programs, and provide the community with information on enrollment and how to benefit from these programs. SoCalGas will work with two of the CBO's to place emphasis on the customers impacted by the Canyon Fire.

Specifically, SoCalGas will pursue the assistance of Catholic Charities of Orange County (CCOC) and request 211 of Orange County, a multilingual referral phone number for Orange County, to be informed about SoCalGas' Customer Assistance Program in order to assist in providing information to the impacted customers. The representatives of these agencies are trained to follow up with callers on these programs as they also act as a crisis information helpline. Additionally, SoCalGas will provide lists targeting the fire impacted area for door-to-door canvassing.

SoCalGas' Regional Public Affairs and Community Relations meets with various community groups on an ongoing basis, among those the general population and low-income customers, to promote the Customer Assistance Programs in the area impacted by the Canyon Fires.

Finally, SoCalGas will coordinate with shelters and temporary relocation entities to inform residents about the Low Income CARE and ESA Programs, and provide assistance with the application process.

 Partner with the program administrator of the customer funded emergency assistance program for low-income customers and increase the assistance limit amount for the next 12 months for impacted customers

SoCalGas' GAF provides a one-time bill assistance amount of up to \$100 on a qualified customer's winter natural gas bill. The annual, one-time bill payment assistance is available to GAF-program eligible customers on a first-come, first-served basis. The GAF program typically begins in February and continues through the end of May each year, or until funds are depleted. To support the victims of the Canyon Fire, SoCalGas is examining and working on the process on how this fund can be extended to customers directly impacted by the Canyon Fire.

 Indicate how the Energy Savings Assistance (ESA) program can be deployed to assist impacted customers

SoCalGas' ESA Program will also leverage the outreach efforts stated above to provide the information about the program's benefits to the customers impacted by the Canyon Fire.

Communications Plan

Res. M-4833 directs SoCalGas to include a communication plan to convey the availability of these protections to customers, especially those who may have been displaced from their homes. SoCalGas will communicate the availability of the emergency residential customer protections to all customers in their service territory by posting an explanation of the protections on their website. Additionally, SoCalGas will call every impacted customer using an automated dialer to notify them they are eligible for the emergency residential protections and will direct the customer to SoCalGas' Customer Contact Center (CCC) or the SoCalGas website for further assistance. Finally, should there be an email address on record, SoCalGas will send an email to every impacted customer to notify them they are eligible for the emergency protections and will direct the customer to SoCalGas' CCC or the SoCalGas website for further assistance.

Establishment of the WCPMA

Pursuant to Res. M-4833, SoCalGas establishes the WCPMA, included as Attachment A. The WCPMA will record all incremental costs incurred by SoCalGas associated with providing the emergency residential customer protections ordered by Res. M-4833. Pursuant to Res. M-4833, SoCalGas is requesting the WCPMA to be approved and made effective October 9, 2017, which is the date of the Canyon Fire.

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. Pursuant to the November 28, 2017 letter, SoCalGas requests expedited treatment and a shortened protest period. Accordingly, any protests must be made in writing and must be received within five days of the date of this AL, which is January 1, 2018. 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 <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 2 (effective after approval) pursuant to General Order (GO) 96-B and consistent with the directive contained in the November 28, 2017 letter. SoCalGas respectfully requests that this filing be approved and made effective October 9, 2017, which is the date of the Canyon Fire.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for A.14-11-004, A.14-12-017, A.15-04-012, A.15-06-020, A.15-07-014, A.15-09-010, A.17-01-013, I.17-02-002, and I.17-03-002. Address change requests to the GO 96-B service list 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 COMPLE	TED BY UTILITY (A	ttach additional pages as needed)		
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G)				
Utility type:	Contact Person: Ray B. Ortiz			
\square ELC \boxtimes GAS	Phone #: (213) 244-3837			
☐ PLC ☐ HEAT ☐ WATER	E-mail: ROrtiz@semprautilities.com			
EXPLANATION OF UTILITY TY	PE (Date Filed/ Received Stamp by CPUC)			
ELC = Electric GAS = Gas				
PLC = Pipeline HEAT = Heat WATER = Water				
Advice Letter (AL) #: 5222-A	_			
Subject of AL: Supplement - Emergence	y Residential Custo	mer Protections for October Wildfire Victims		
Keywords (choose from CPUC listing):	Memorandum Acco	unt		
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 #:		
Resolution M-4833				
Does AL replace a withdrawn or rejected	ed AL? If so, identif	Ty 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		
Resolution Required? Yes No		Tier Designation: 1 2 2 3		
Requested effective date: 10/9/17		No. of tariff sheets: 5		
Estimated system annual revenue effective				
Estimated system average rate effect (%): <u>N/A</u>			
When rates are affected by AL, include (residential, small commercial, large C.		showing average rate effects on customer classes ting).		
Tariff schedules affected: Preliminary S	Statement Part VI -	Memorandum Accounts - Wildfires Customer		
Protections Memorandum Account (WCPMA) 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		outhern California Gas Company		
		Attention: Ray B. Ortiz		
505 Van Ness Ave., San Francisco, CA 94102		55 West 5 th Street, GT14D6 Los Angeles, CA 90013-1011		
EDTariffUnit@cpuc.ca.gov		COrtiz@semprautilities.com		
		Cariffs@socalgas.com		

¹ Discuss in AL if more space is needed.

ATTACHMENT A Advice No. 5222-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 54558-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, DESCRIPTION AND LISTING OF MEMORANDUM ACCOUNTS, Sheet 2	Revised 54452-G
Original 54559-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, WILDFIRES CUSTOMER PROTECTIONS MEMORANDUM ACCOUNT (WCPMA)	Original 54468-G
Revised 54560-G Revised 54561-G Revised 54562-G	TABLE OF CONTENTS TABLE OF CONTENTS TABLE OF CONTENTS	Revised 54557-G Revised 54549-G Revised 54475-G

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO. 54558-G 54452-G

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS 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)

Otay Mesa Pipeline Capacity Memorandum Account (OMPCMA)

Wildfires Customer Protections Memorandum Account (WCPMA)

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(TO BE INSERTED BY UTILITY) 5222-A ADVICE LETTER NO. DECISION NO.

ISSUED BY Dan Skopec Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Dec 27, 2017 DATE FILED Jan 2, 2018 EFFECTIVE

RESOLUTION NO. M-4833

Original Original CANCELING

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

54559-G 54468-G

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PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS WILDFIRES CUSTOMER PROTECTIONS MEMORANDUM ACCOUNT (WCPMA)

1. Purpose

The WCPMA is an interest bearing account that is recorded on the Utility's financial statements. Pursuant to Resolution M-4833, the purpose of this account is to record all incremental costs incurred by SoCalGas associated with providing the residential emergency customer protections ordered therein. Resolution M-4833 directs SoCalGas to take all reasonable and necessary actions to implement the residential emergency customer protections to support the victims of the October 2017 Canyon Fire. The WCPMA is effective October 9, 2017, the date of the Canyon Fire.

2. Applicability

The WCPMA shall apply to all customers.

3. Rates

See Disposition Section.

4. Accounting Procedures

SoCalGas maintains the WCPMA by making entries at the end of each month, net of FF&U, as follows:

- A debit entry for the costs associated with wildfire-related Emergency Customer Protections.
- An entry equal to amortization as authorized by the Commission.
- An entry equal to the interest on the average balance in the account during the month, calculated in the manner described in the Preliminary Statement, Part I, J.

5. Disposition

The balance in the WCPMA will be addressed in SoCalGas' next general rate case proceeding or other applicable proceeding designated by the Commission.

(TO BE INSERTED BY UTILITY) 5222-A ADVICE LETTER NO. DECISION NO.

ISSUED BY Dan Skopec Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) DATE FILED Dec 27, 2017

Jan 2, 2018 EFFECTIVE RESOLUTION NO. M-4833

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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(TO BE INSERTED BY UTILITY) 5222-A ADVICE LETTER NO. DECISION NO.

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

(TO BE INSERTED BY CAL. PUC) Dec 27, 2017 DATE FILED Jan 2, 2018 **EFFECTIVE** RESOLUTION NO. M-4833

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LOS ANGELES, CALIFORNIA CANCELING Revised

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5222-A DECISION NO.

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

(TO BE INSERTED BY CAL. PUC) Dec 27, 2017 DATE FILED Jan 2, 2018 EFFECTIVE RESOLUTION NO. M-4833

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Wildfires Customer Protections Memorandum Account (WCPMA)

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. \$5222-A\$ DECISION NO.

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ISSUED BY

Dan Skopec

Vice President

Regulatory Affairs

 $\begin{array}{c} \text{(TO BE INSERTED BY CAL. PUC)} \\ \text{DATE FILED} & \underline{Dec~27,~2017} \\ \text{EFFECTIVE} & \underline{Jan~2,~2018} \\ \text{RESOLUTION NO.} & M-4833 \\ \end{array}$