#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 1, 2018

**Advice Letter 5233-G** 

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

SUBJECT: Revision of Gas Preliminary Statements to Implement New Accounting Guidance Principles

Dear Mr. van der Leeden:

Advice Letter 5233-G is effective as of January 1, 2018.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Randoft



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 14, 2017

Advice No. 5233 (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Revision of Gas Preliminary Statements to Implement New Accounting Guidance Principles

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

# **Background**

This filing revises the Pension Balancing Account (PBA) and Post-Retirement Benefits Other Than Pensions (PBOPs) Balancing Account (PBOPBA) in SoCalGas' Preliminary Statement Part V., Balancing Accounts.

#### **Background**

In March 2017, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (Update) No. 2017-07 which requires the service cost component of pension and PBOP costs to be presented in the same income statement line item as other employee compensation costs arising from services rendered during the period and the non-service cost components of pension and PBOP costs to be presented separately outside of operating income (other income or expense). Update No. 2017-07 modifies only the classification of costs on the income statement and does not change the calculation of pension and PBOP costs, or the service and non-service cost components.

SoCalGas does not have discretion whether or not to follow Update No. 2017-07. The United States Securities and Exchange Commission (SEC) has the legal authority to mandate accounting practices for U.S. publicly-traded companies, including SoCalGas. Although the SEC has delegated to FASB the determination of Generally Accepted Accounting Principles (GAAP) to be followed for these companies, the SEC retains the legal authority to enforce GAAP as developed by the FASB to ensure that public companies are meeting their financial reporting obligations under the federal securities

laws. The SEC requires companies to prepare their financial statements in conformance with GAAP, including the accounting changes promulgated in Update No. 2017-07.

### **Tariff Revisions**

To ensure non-service pension and PBOP cost components continue to be fully balanced as authorized in SoCalGas 2016 General Rate Case (GRC), SoCalGas proposes the following revisions to "Section 4. Accounting Procedures" in the PBA and PBOPBA Preliminary Statements as summarized below and reflected in Attachment A.

- Revise topic heading within Section 4 from "O&M Component" to "O&M/Other Expense/Other Income Component."
- In the "Purpose Section" and in the first paragraph of "Accounting Procedures Section," include references to this advice letter for approval of these changes as proposed herein.

SoCalGas plans to address pension and PBOP non-service costs in its next GRC to align the regulatory treatment of these costs consistent with current GAAP.

# **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 this advice letter, which is January 3, 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 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 1 (effective pending disposition) and respectfully requests an approval date of January 1, 2018, the date the new accounting standard is effective.

# **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, 2016 GRC. Address change requests to the GO 96-B service list should be directed by electronic mail to <a href="mailto:tariffs@socalgas.com">tariffs@socalgas.com</a> 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 <a href="mailto:Process Office@cpuc.ca.gov">Process Office@cpuc.ca.gov</a>.

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:	Contact Person: I	Ray B. Ortiz		
□ ELC □ GAS	Phone #: (213) 244-3837			
☐ PLC ☐ HEAT ☐ WATER	E-mail: ROrtiz@semprautilities.com			
EXPLANATION OF UTILITY TY				
ELC = Electric GAS = Gas		(Date 1 near necessed Stamp 2) of 00)		
	/ATER = Water	ATER = Water		
Advice Letter (AL) #: 5233				
Subject of AL: Revision of Gas Preliminary Statements to Implement New Accounting Guidance Principles				
<u></u>				
Keywords (choose from CPUC listing): Balancing Accounts				
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? $\square$ Yes $\boxtimes$ No		Tier Designation: $\square$ 1 $\square$ 2 $\square$ 3		
Requested effective date: $1/1/18$ No. of tariff sheets: $3$		No. of tariff sheets: 3		
Estimated system annual revenue effect	et: (%): <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: Preliminary Statements and TOCs				
Service affected and changes proposed <sup>1</sup> : N/A				
Pending advice letters that revise the same tariff sheets: N/A				
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		Southern California Gas Company Attention: Ray B. Ortiz		
505 Van Ness Ave.,		555 West 5th Street, GT14D6		
San Francisco, CA 94102		Los Angeles, CA 90013-1011		
EDTariffUnit@cpuc.ca.gov		ROrtiz@semprautilities.com		
		Tariffs@socalgas.com		

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

# ATTACHMENT A Advice No. 5233

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 54544-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, PENSION BALANCING ACCOUNT (PBA), Sheet 1	Revised 52940-G
Revised 54545-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, POST-RETIREMENT BENEFITS OTHER THAN PENSIONS, BALANCING ACCOUNT (PBOPBA), Sheet 1	Revised 52942-G
Revised 54546-G	TABLE OF CONTENTS	Revised 54540-G

# LOS ANGELES, CALIFORNIA CANCELING

# PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS PENSION BALANCING ACCOUNT (PBA)

Sheet 1

#### 1. Purpose

The PBA is an interest bearing balancing account recorded on SoCalGas' financial statements. The purpose of this account is to balance the difference between the forecasted and actual minimum contributions to the Utility's pension fund. Pursuant to Decision (D.) 16-06-054, TY 2016 General Rate Case (GRC), effective January 1, 2016, the PBA will continue for the three-year GRC cycle through December 31, 2018 or until the effective implementation date of SoCalGas' next GRC. Pursuant to Advice No. 5233, the PBA was modified effective January 1, 2018 to follow the new accounting guidance under Generally Accepted Accounting Principles for the treatment of the non-service cost component of pension costs.

The authorized pension revenue requirement and the related actual pension expenses recorded in the PBA are adjusted for related pension costs capitalized in ratebase and for inter-company pension costs (i.e., for shared services) billed to and charged from SoCalGas' affiliate companies. In addition, the PBA records an adjustment for the difference between pension costs embedded in authorized depreciation along with the related return and the corresponding actual pension costs embedded in recorded depreciation along with the related return.

#### 2. Applicability

The PBA shall apply to gas customers.

#### 3. Rates

The PBA balance will be included in gas transportation rates.

#### 4. Accounting Procedures

Consistent with D. 92-12-015 which initially adopted the PBA regulatory mechanism modified in D. 09-09-011, authorized to be continued per D.16-06-054 and modified per Advice No. 5233, SoCalGas will maintain the PBA by making entries at the end of each month as follows:

### O&M/Other Expense/Other Income Component

- a. A debit/credit entry equal to the difference between:
  - 1. One-twelfth of the Utility's annual pension funding level currently embedded in rates, reduced by the component of authorized pension costs capitalized to utility ratebase and
  - 2. Actual pension expense, reduced by the component of pension costs capitalized to utility ratebase;

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5233 DECISION NO.

1H9

ISSUED BY

Dan Skopec

Vice President

Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
SUBMITTED Dec 14, 2017
EFFECTIVE Jan 1, 2018
RESOLUTION NO.

N

N

N

N

# PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS POST-RETIREMENT BENEFITS OTHER THAN PENSIONS **BALANCING ACCOUNT (PBOPBA)**

Sheet 1

### 1. Purpose

The PBOPBA is an interest bearing balancing account recorded on SoCalGas' financial statements. The purpose of this account is to balance the difference between the annual PBOP costs embedded in authorized rates and the actual tax-deductible contributions to the PBOP Trust. Pursuant to Decision (D.) 16-06-054, TY 2016 General Rate Case (GRC), effective January 1, 2016, the PBOPBA will continue for the three-year GRC cycle through December 31, 2018 or until the effective implementation date of SoCalGas' next GRC. Pursuant to Advice No. 5233, the PBOPBA was modified effective January 1, 2018 to follow new accounting guidance under Generally Accepted Accounting Principles for the treatment of the non-service cost component of PBOP costs.

N N

The authorized PBOP revenue requirement and the related actual PBOP expenses recorded in the PBOPBA are adjusted for related PBOP costs capitalized in ratebase and for inter-company PBOP costs (i.e., for shared services) billed to and charged from SoCalGas' affiliate companies. In addition, the PBOPBA records an adjustment for the difference between PBOP costs embedded in authorized depreciation along with the related return and the corresponding actual PBOP costs embedded in recorded depreciation, along with the related return.

#### 2. Applicability

The PBOPBA shall apply to gas customers.

#### 3. Rates

The PBOPBA balance will be included in gas transportation rates.

#### 4. Accounting Procedures

Consistent with D.92-12-015 which initially adopted the PBOP regulatory mechanism, modified in D.09-09-011, authorized to be continued per D.16-06-054 and modified per Advice No. 5233, SoCalGas will maintain the PBOPBA by making entries at the end of each month as follows:

N

#### O&M/Other Expense/Other Income Component

N

- a. A debit/credit entry equal to the difference between:
  - 1. One-twelfth of the Utility's annual PBOP funding level currently embedded in rates, reduced by the component of authorized PBOP costs capitalized to utility ratebase and
  - 2. Actual tax-deductible PBOP contributions to the PBOP Trust, reduced by the component of PBOP costs capitalized to utility ratebase;

(Continued)

(TO BE INSERTED BY UTILITY) 5233 ADVICE LETTER NO. DECISION NO.

1H7

ISSUED BY Dan Skopec Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Dec 14, 2017 SUBMITTED Jan 1, 2018 **EFFECTIVE** RESOLUTION NO.

**GENERAL** 

Cal. P.U.C. Sheet 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.

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(Continued)

 $\begin{array}{ll} \mbox{(TO BE INSERTED BY UTILITY)} \\ \mbox{ADVICE LETTER NO.} & 5233 \\ \mbox{DECISION NO.} \end{array}$ 

1H7

ISSUED BY **Dan Skopec**Vice President

Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

DATE FILED Dec 14, 2017

EFFECTIVE Jan 1, 2018

RESOLUTION NO.