PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 21, 2018

Advice Letter 5247-G

Southern California Gas Company Attn: Ray Ortiz 555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011

SUBJECT: Emergency Residential Customer and Non-Residential Customer Protections for December 2017 Wildfire Victims

Dear Mr. Ortiz:

Advice Letter 5247-G is effective as of December 4, 2017.

Sincerely,

Edward Randolph

Director, Energy Division

Edward Rambofate



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
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January 26, 2018

Advice No. 5247 (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Emergency Residential Customer and Non-Residential Customer Protections for December 2017 Wildfire Victims

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC): (1) emergency residential and non-residential customer protections for customers impacted by the December 2017 California wildfires (wildfires or fires); and (2) revisions to its tariff schedules, applicable throughout its service territory, as shown on Attachment A. As directed in Resolution (Res.) M-4835, SoCalGas is requesting expedited advice letter (AL) treatment, pursuant to the Commission's General Order (GO) 96-B, and a shortened protest and reply period of five days.

Purpose

This filing provides emergency residential and non-residential customer protections for SoCalGas customers impacted by the wildfires, in accordance with Res. M-4835, as well as associated fire-related impact (e.g., resulting floods, mudslides, debris flow). This filing also amends SoCalGas' Preliminary Statement Part VI., Regulatory Accounts – Memorandum Accounts, Wildfires Customer Protections Memorandum Account (WCPMA) to address the December wildfires.

Background

On January 11, 2018, the Commission adopted Res. M-4835. The resolution was issued in response to Governor Edmund G. Brown, Jr.'s proclamations of a state of emergency due to the wildfires, which affected the counties of Santa Barbara, Ventura, Los Angeles, Riverside, and San Diego. Res. M-4835 notes that on December 4, 2017, wildfires started across the Santa Barbara, Ventura, Los Angeles, and Riverside counties causing evacuations and damage to critical utility infrastructure. These wildfires impacted SoCalGas' service territory and damaged critical infrastructure, destroyed and severely damaged hundreds of customers' homes, and caused the evacuation of several thousand

residents.

Res. M-4835 directs SoCalGas to take all reasonable and necessary actions to implement the emergency residential and non-residential consumer protections adopted in the resolution to support the victims of the fires, 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 revise the WCPMA to account for the fires to track incremental costs associated with complying with the resolution.

Estimated Wildfire Impact and Eligible Customers

The wildfires began on December 4, 2017, and impacted communities in the counties of Santa Barbara, Ventura, Los Angeles, Riverside, and San Diego. The evacuation zones established by the local officials included an estimated 39,000 facilities with gas service, of which an estimated 1,159 structures were damaged and an estimated 415 structures destroyed. To date, an estimated 485 SoCalGas residential customers and an estimated 3 non-residential customers are known to have had their service disrupted either as a result of the damage or for precautionary reasons. The extent of the wildfires' impact is continuing to be evaluated.

Customers eligible for the wildfire residential and non-residential customer protections are those directly impacted by the fires and associated fire-related impact (Eligible Customers). Eligible Customers are gas customers, identified by SoCalGas as being directly impacted by the fires (including fire-related mudslides), or gas customers who have self-reported as being impacted. Eligible Customers would include those whose gas service was interrupted or those forced to re-locate (either temporarily or permanently) within the fire zones or within one quarter mile of the fire zones, as determined by Cal Fire.

Description of Adopted Consumer Protections

In the following section, SoCalGas describes each of the residential and non-residential customer protections identified in Res. M-4835. Unless otherwise noted, each of these customer protections are applicable to both residential and non-residential customers and are effective through January 11, 2019.

Deposit Requirements

Res. M-4835 directs SoCalGas to waive deposit requirements for Eligible Customers seeking to reestablish service.

SoCalGas does not require customers with a satisfactory credit rating to pay a deposit. SoCalGas will waive any deposit that would otherwise be collected for a new Turn-On one time per Eligible Customer after the initial fire-related closing. SoCalGas will waive the deposit requirement for Eligible Customers requesting to reestablish service through January 11, 2019, at either the same or a new facility.

Move-in and Move-outs

Res. M-4835 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 they are relocating to another facility due to the damage to their home, SoCalGas will make every attempt to have service available to residential customers on the requested day.

Estimated Bills

Res. M-4835 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 wildfires.

SoCalGas uses reads collected by advanced meter modules to bill most customers in its service territory. Eligible Customers with communicating devices will be billed using the actual reads from the meter. SoCalGas will review estimated bills and make necessary corrections to reflect reduced consumption during the period of time service was interrupted or the customer was subject to mandatory evacuation and the home or unit was unoccupied as a result of the fires or resulting fire-related impact.

Disconnection Charges

Res. M-4835 directs SoCalGas to identify the premises of Eligible Customers that are not capable of receiving utility services and discontinue billing these premises without assessing a disconnection charge.

SoCalGas does not currently assess a disconnection charge. Additionally, Eligible Customers disconnected due to the fires will not be charged a reconnection charge, nor will a deposit be required, through January 11, 2019.

Monthly Access or Minimum Charges

Res. M-4835 directs SoCalGas to prorate any monthly access charge or minimum charges for Eligible Customers typically assessed so that customers do not bear these costs for the time period after the customer's home was rendered unserviceable by the fires.

SoCalGas will close Eligible Customers' accounts as of the date of the fire or associated fire-related impact for customers whose residential or non-residential facility is destroyed or damaged and uninhabitable. SoCalGas does not assess any access or minimum charges on closed accounts. SoCalGas will review closing bills for residential Eligible Customers for possible bill forgiveness. SoCalGas will also fully refund any existing deposit on the account after the closing bill is forgiven. Eligible Customer accounts will be

closed as of December 5, 2017 (fires) and January 9, 2018 (mudslides) for customers whose facility was destroyed or damaged and uninhabitable.

SoCalGas will temporarily suspend billing for all Eligible Customers whose service is interrupted until service has been restored, thus forgoing minimum and all other charges for the time period that the customer's facility was without gas service. SoCalGas will also waive charges for usage registered by our meter during the period that a residential Eligible Customer was evacuated and did not have an opportunity to shut off all appliances.

Payment Plans

Res. M-4835 directs SoCalGas to implement the following payment plan options for affected customers:

- For Eligible 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 Eligible Customers who currently have service but go into arrearage after December 4, 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.
- An Eligible Customer who is offered a payment plan shall not be precluded from paying off an arrearage more quickly.

SoCalGas will review the accounts of residential Eligible Customers to forgive outstanding balances when SoCalGas issues the closing bills for customers whose residences are physically destroyed or damaged by the fire or mudslides. SoCalGas will extend the payment plan options as directed for any amounts which do not qualify for bill forgiveness.

For other Eligible Customers with service who request additional grace period for payment, SoCalGas will offer payment plan options as directed for any amount the up to the total outstanding balance on the account.

SoCalGas does not preclude any customer from paying off an installment payment plan more quickly.

Customer Disconnections

Res. M-4835 directs SoCalGas to suspend disconnection for non-payment and associated fees for Eligible Customers, waive the deposit and late fee requirements for Eligible 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.

SoCalGas will suspend collection activity for all Eligible Customers. SoCalGas does not charge late fees to residential customers and SoCalGas will waive late fees assessed to affected non-residential customers. SoCalGas does not report active accounts to credit reporting agencies or to other such services. SoCalGas will not request a new or additional deposit from affected customers that may otherwise result from late payment.

Low-Income Customer Protections

The following section provides information related to Res. M-4835 requirements relating to low-income customer protections.

- Freeze all standard and high-usage reviews for California Alternate Rates for Energy (CARE) program eligibility in impacted counties until at least the end of the year, and potentially longer as warranted.
- 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.

CARE customers directly affected by the wildfires will not be subject to eligibility verification until the end of 2018, unless further extended by SoCalGas or the Commission.

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 Eligible 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. 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 will meet 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 wildfires.

Finally, SoCalGas will coordinate with shelters and temporary relocation entities to inform residents about the Low-Income CARE and Energy Savings Assistance (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' Gas Assistance Fund (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.

SoCalGas will double the GAF grant amount for Eligible Customers from the impacted areas (up to \$200). SoCalGas will leverage the proactive communications plan detailed below to include information on this program and how they can apply.

Indicate how the ESA program can be deployed to assist Eligible 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 wildfires.

Communications Plan

In response to Res. M-4835, SoCalGas will communicate the availability of the emergency residential and non-residential customer protections to all customers in their service territory by posting an explanation of the protections on the SoCalGas website. https://www.socalgas.com/support-for-wildfire-impacted-communities.

SoCalGas will call Eligible Customers using an automated dialer to notify them they are eligible for the emergency residential and non-residential protections and will direct the customer to SoCalGas' Customer Contact Center (CCC), 800-427-2200 or the SoCalGas website for further assistance.

For customers with an email address on file, SoCalGas will email every Eligible Customer to notify them they are eligible for the emergency protections and will direct the customer to SoCalGas' CCC or the SoCalGas website https://www.socalgas.com/support-for-wildfire-impacted-communities for further assistance.

Revisions to the WCPMA

Pursuant to Res. M-4835, SoCalGas amends the WCPMA, included as Attachment A. The WCPMA will record all incremental costs incurred by SoCalGas associated with providing the emergency residential and non-residential customer protections ordered by Res. M-4835. Pursuant to Res. M-4835, SoCalGas is requesting the revisions to the WCPMA be approved and made effective December 4, 2017, which is the start date of the wildfires.

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 Res. M-4835, 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 31, 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 (<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 2 (effective after approval) pursuant to GO 96-B and consistent with the directive contained in Res. M-4835. SoCalGas respectfully requests that this filing be approved and made effective December 4, 2017, which is the start date of the wildfires.

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 COMPLETED BY UTILITY (Attach additional pages as needed)				
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G)				
Utility type:	Contact Person: Ray B. Ortiz			
☐ ELC	Phone #: (213) 24	4-3837		
☐ PLC ☐ HEAT ☐ WATER	E-mail: ROrtiz@se	emprautilities.com		
EXPLANATION OF UTILITY TY	YPE (Date Filed/ Received Stamp by CPUC)			
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat W	ATER = Water			
Advice Letter (AL) #: 5247				
Subject of AL: Emergency Residential Customer and Non-Residential Customer Protections for December 2017 Wildfire Victims				
Keywords (choose from CPUC listing): N	Memorandum Acco	unt		
AL filing type: Monthly Quarterly Annual One-Time Other				
If AL filed in compliance with a Commis				
Resolution M-4835				
Does AL replace a withdrawn or rejecte	d AL? If so, identif	Ty the prior AL: No		
Summarize differences between the AL				
		<u> </u>		
Does AL request confidential treatment? If so, provide explanation: No				
Resolution Required? Yes No		Tier Designation: 1 2 3		
Requested effective date: 12/4/17		No. of tariff sheets: 3		
Estimated system annual revenue effect	t: (%): <u>N/A</u>			
Estimated system average rate effect (%	6): <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 proposed ¹ : 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: Tariff Unit		Attention: Ray B. Ortiz		
505 Van Ness Ave.,		55 West 5th Street, GT14D6		
San Francisco, CA 94102 EDTariffUnit@cpuc.ca.gov		Los Angeles, CA 90013-1011 COrtiz@semprautilities.com		
LD I at III CIII C CPUC.Ca.guv	·	Cariffs@socalgas.com		

¹ Discuss in AL if more space is needed.

ATTACHMENT A Advice No. 5247

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 54666-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS, WILDFIRES CUSTOMER PROTECTIONS MEMORANDUM ACCOUNT (WCPMA)	Original 54559-G
Revised 54667-G Revised 54668-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 54665-G Revised 54562-G

LOS ANGELES, CALIFORNIA CANCELING

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 (Res.) M-4833 and Res. M-4835, the purpose of this account is to record all incremental costs incurred by SoCalGas associated with providing the residential and non-residential emergency customer protections ordered therein. Res. 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. Res. M-4835 directs SoCalGas to take all reasonable and necessary actions to implement the residential and non-residential emergency customer protections to support the victims of the December 2017 California wildfires as well as those impacted by fire-related impact such as floods, mudslides, and debris flow. The WCPMA is effective October 9, 2017, the date of the Canyon Fire, for the recording of the emergency customer protection costs associated with this fire. For the recording of the emergency customer protection costs associated with the December 2017 wildfires, the WCPMA is effective December 4, 2017, which is the start date of the wildfires.

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. A debit entry for the costs associated with wildfire-related Emergency Customer Protections.
- b. 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) 5247 ADVICE LETTER NO. DECISION NO.

ISSUED BY Dan Skopec Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Jan 26, 2018 DATE FILED Dec 4, 2017 EFFECTIVE

RESOLUTION NO. M-4835

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5247 DECISION NO.

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

(TO BE INSERTED BY CAL. PUC) Jan 26, 2018 DATE FILED Dec 4, 2017 EFFECTIVE RESOLUTION NO. M-4835

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5247 DECISION NO.

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

(TO BE INSERTED BY CAL. PUC) Jan 26, 2018 DATE FILED Dec 4, 2017 EFFECTIVE RESOLUTION NO. M-4835