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May 23, 2018

<u>Advice No. 5255-A</u> (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Supplement - Modification of Preliminary Statement Part VIII Gas Cost Incentive Mechanism (GCIM), Pursuant to Decision (D.) 18-01-005

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

<u>Purpose</u>

This supplemental filing replaces in its entirety Advice No. (AL) 5255, Modification of Preliminary Statement Part VIII Gas Cost Incentive Mechanism (GCIM), filed on February 12, 2018. After discussions with the CPUC's Energy Division, this supplemental AL incorporates tariff changes suggested by the Office of Ratepayer Advocates (ORA) in its protest to AL 5255 submitted on March 5 and includes a reduced, five-day protest period.

This filing complies with Ordering Paragraph (OP) 4 and OP 5 of D.18-01-005, Decision Approving Southern California Gas Company's Shareholder Reward for Year 23 (2016-2017) of the Gas Cost Incentive Mechanism, which states:

4. Within 30 days from the issuance date of this Decision, Southern California Gas Company (SoCalGas) shall file a Tier 1 Advice Letter to modify its Tariff Preliminary Statement for the Gas Cost Incentive Mechanism to note that SoCalGas is required to confer with the Commission's Office of Ratepayer Advocates (ORA) in the event that SoCalGas anticipates that its mid-season core storage inventory will be less than 47.0 billion cubic feet on July 31 of each calendar year. 5. Southern California Gas Company shall provide written notification of its mid-season (July 31) and annual (November 1) core purchased storage inventory targets to the Commission's Energy Division.

The tariff modifications included as Attachment A are those necessary to implement D.18-01-005.

Background

SoCalGas filed Application (A.) 17-06-016 on June 15, 2017 to request a shareholder reward of \$4,235,030 for GCIM Year 23, which covered the period of April 1, 2016 through March 31, 2017. The GCIM compares the Actual Total Annual Purchased Gas Cost (Actual Annual Cost) to the Annual Benchmark Budget (Benchmark Budget). The Actual Annual Cost is the sum of: (1) actual gas commodity costs and transportation costs, (2) net gain or loss from certain gas hedging transactions, (3) net revenues from secondary market services (SMS), and (4) certain other revenues, expenses, and adjustments identified in SoCalGas' GCIM tariff.

The GCIM also includes gas storage inventory targets. Pursuant to D.06-10-029, an initial storage target of 49 billion cubic feet (Bcf) was established for July 31, 2006. For years beyond 2006, D.06-10-029 required SoCalGas to obtain agreement from ORA and The Utility Reform Network (TURN) for mid-season core-purchased inventory targets that must be met unless otherwise agreed to by ORA and TURN. Each agreed upon mid-season core-purchased inventory target was to be reflected in SoCalGas' GCIM tariff.

For GCIM Year 22, SoCalGas obtained agreement from ORA for a mid-season storage (i.e., July 31, 2015) storage target of 47 Bcf. SoCalGas and ORA were not able to come to an agreement regarding the mid-season storage target for GCIM Year 23.¹

Pursuant to D.18-01-005 and beginning with GCIM Year 25, SoCalGas must confer with ORA in the event that SoCalGas anticipates that its mid-season core storage inventory will be less than of 47 Bcf. In addition, SoCalGas shall provide written notification of its mid-season (July 31) and annual (November 1) core purchased storage inventory targets to the Commission's Energy Division.

Proposed Revisions to GCIM

Pursuant to D.18-01-005, SoCalGas proposes to modify its Sheet 5 of GCIM Preliminary Statement Part VIII as shown in redline below and in Attachment A.

¹ TURN did not participate in either Year 22 or Year 23 mid-season storage target discussions due to time constraints. SoCalGas and ORA were also unable to come to an agreement regarding the mid-season storage target for GCIM Year 24.

C. GAS COST INCENTIVE MECHANISM (GCIM) METHODOLOGY

7. SoCalGas must confer with the Office of Ratepayer Advocates in the event that SoCalGas anticipates that its mid-season core storage inventory will be less than 47 Bcf on July 31 of each calendar year. SoCalGas shall provide written notification of its mid-season (July 31) and annual (November 1) core purchased storage inventory targets to the Commission's Energy Division. The Annual Storage Inventory target on November 1 is 83 Bcf of the physical gas supply, with an accepted variance of +0/-2 Bcf. This target does not include any park or net loan positions. If the November 1 target is not attained, deliveries must be made to insure that a minimum of 69 Bcf of actual physical gas in the core's inventory is reached by December 1. SoCalGas' share of the The January, February and March minimum month-end targets (equivalent to peak day minimums necessary for serving the core) must be met. Any deviation from these storage winter targets should be explained in SoCalGas' annual GCIM filing. SoCalGas has obtained agreement from ORA for a mid-season storage target of 47 Bcf as of July 31, 2015, which is a minimum storage level SoCalGas must meet unless otherwise agreed to by ORA and TURN. TURN was unable to participate in the review process for this most recent mid-season storage target due to time constraints. This target may include net loan positions.

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 direction of Commission Staff, the Commission has set a five-day protest period and protest must be made in writing and received by May 28, 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

A copy 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 should 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: <u>ROrtiz@SempraUtilities.com</u>

Effective Date

SoCalGas believes this AL is subject to Energy Division disposition and, per OP 4 of D.18-01-005, should be classified as a Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B. Therefore, SoCalGas respectfully requests that the tariff sheets submitted herein be made effective for service on May 23, 2018, which is the date submitted.

<u>Notice</u>

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list A.17-06-016. 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. SOU	JTHERN CALIFO	RNIA GAS COMPANY (U904G)			
Utility type:	Contact Person: Ray Ortiz				
\Box ELC \Box GAS	Phone #: (213) 244-3837				
PLC HEAT WATER					
EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)					
ELC = Electric GAS = Gas					
PLC = Pipeline HEAT = Heat W	VATER = Water				
Advice Letter (AL) #: <u>5255-A</u>					
Subject of AL: <u>Supplement - Modificat</u>	ion of Preliminary S	Statement Part VIII Gas Cost Incentive			
Mechanism (GCIM), Pursuant to Decis	ion (D.) 18-01-005				
Keywords (choose from CPUC listing):	Storage				
AL filing type: Monthly Quarter	ly 🗌 Annual 🖂 On	e-Time 🗌 Other			
If AL filed in compliance with a Comm	•				
D.18-01-005					
Does AL replace a withdrawn or rejected	ed AL? If so, identi	the prior AL No. N/A			
Summarize differences between the AI		· -			
	P				
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: 5/23/18		No. of tariff sheets: <u>3</u>			
Estimated system annual revenue effect	ct: (%): <u>N/A</u>				
Estimated system average rate effect (%): <u>N</u> /A				
		showing average rate effects on customer classes			
(residential, small commercial, large C		-			
Tariff schedules affected: <u>Preliminary</u>	Statement VIII - (Gas Cost Incentive Mechanism (GCIM) and TOCs			
Service affected and changes proposed ¹ : <u>N/A</u>					
Pending advice letters that revise the same tariff sheets: <u>N/A</u>					
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., San Francisco, CA 94102		55 West 5 th Street, GT14D6 os Angeles, CA 90013 1011			
San Francisco, CA 94102 EDTariffUnit@cpuc.ca.gov		os Angeles, CA 90013-1011 ROrtiz@semprautilities.com			
		Cariffs@socalgas.com			

¹ Discuss in AL if more space is needed.

ATTACHMENT A Advice No. 5255-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 55128-G	PRELIMINARY STATEMENT, PART VIII, GAS COST INCENTIVE MECHANISM, Sheet 5	Revised 54723-G Revised 51525-G
Revised 55129-G Revised 55130-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 55070-G Revised 54748-G

CANCELING LOS ANGELES, CALIFORNIA

55128-G CAL. P.U.C. SHEET NO. Revised CAL. P.U.C. SHEET NO.

54723-G 51525-G

Sheet 5

PRELIMINARY STATEMENT PART VIII GAS COST INCENTIVE MECHANISM

(Continued)

C. GAS COST INCENTIVE MECHANISM (GCIM) METHODOLOGY (Continued)

- k. Pursuant to Preliminary Statement, Part VI, Description of Regulatory Accounts Memorandum, the Blythe Operational Flow Requirement Memorandum Account (BOFRMA) will record charges associated with the Utility Gas Procurement Department's purchasing and delivery of gas to sustain operational flows at Blythe. GCIM actual cost will be adjusted for charges or credits to the BOFRMA. Entries to this account, except for interest and amortization, along with related GCIM adjustments, ceased on April 1, 2009, the date the responsibility for managing minimum flow requirements for system reliability was transferred from the Utility Gas Procurement Department to the System Operator pursuant to D.07-12-019.
- 7. SoCalGas must confer with the Office of Ratepayer Advocates in the event that SoCalGas anticipates that its mid-season core storage inventory will be less than 47 Bcf on July 31 of each calendar year. SoCalGas shall provide written notification of its mid-season (July 31) and annual (November 1) core purchased storage inventory targets to the Commission's Energy Division. The Annual Storage Inventory target on November 1 is 83 Bcf of the physical gas supply, with an accepted variance of +0/-2 Bcf. This target does not include any park or net loan positions. If the November 1 target is not attained, deliveries must be made to ensure that a minimum of 69 Bcf of actual physical gas in the core's inventory is reached by December 1. SoCalGas' share of the January, February and March minimum month-end targets (equivalent to peak day minimums necessary for serving the core) must be met. Any deviation from these winter storage targets should be explained in SoCalGas' annual GCIM filing.
- 8. Tolerance. To determine GCIM rewards or penalties, tolerance bands above or below the benchmark budget are used. Tolerance bands are calculated as a percentage of the monthly gas commodity portion of the benchmark budget and is added to or subtracted from the benchmark budget as "upper tolerance band" or "lower tolerance band" (sharing bands), respectively. The specific percentages are approved by the CPUC and may be redetermined in subsequent CPUC decisions (See Section 9).
- 9. Calculation of Rewards and Penalties Under GCIM
 - a. On an annual basis, actual total purchased gas costs are compared to the annual benchmark budget to determine if a reward/savings or penalty applies.
 - b. If actual total purchased gas costs for the incentive year are less than the annual benchmark budget, the difference constitutes a savings incentive to be shared between ratepayers and shareholders as defined by the Sharing Bands as follows:

Sharing Band 0.0% -1.00%	Ratepayer 100%	Shareholder 0%
1.00% - 5.00%	75%	25%
5.00% & Above	90%	10%

The shareholder reward will be capped at 1.5% of the actual annual gas commodity costs.

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

(Continued)

(TO BE INSERTED BY CAL. PUC) May 23, 2018 SUBMITTED May 23, 2018 EFFECTIVE **RESOLUTION NO.**

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ISSUED BY Dan Skopec Vice President Regulatory Affairs (TO BE INSERTED BY CAL. PUC) SUBMITTED May 23, 2018 EFFECTIVE May 23, 2018 RESOLUTION NO.

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