

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 26, 2019

**Advice Letter 5471 & 5471-A**

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

**SUBJECT: Modification to Rule No. 30 Operational Flow Order (OFO) Noncompliance Charges Pursuant to Decision (D.) 19-05-030**

Dear Mr. van der Leeden:

Advice Letter 5471 and 5471-A is effective as of June 03, 2019.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division



**Ronald van der Leeden**  
Director  
Regulatory Affairs

555 W. Fifth Street, GT14D6  
Los Angeles, CA 90013-1011  
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Fax: 213.244.4957

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May 31, 2019

Advice No. 5471  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Modification to Rule No. 30 Operational Flow Order (OFO)  
Noncompliance Charges Pursuant to Decision (D.) 19-05-030**

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

**Purpose**

This submittal complies with Ordering Paragraphs (OPs) 4 and 7 of D.19-05-030, which state:

4. Southern California Gas Company and San Diego Gas & Electric Company shall file a Tier 1 Advice Letter to implement the Stage 4 and Stage 5 Operational Flow Order noncompliance charges for the period of June 1 through September 30.

7. Southern California Gas Company and San Diego Gas & Electric Company shall file a Tier 1 Advice Letter to implement the eight-stage Operational Flow Order.

The tariff modifications, included as Attachment A, are those necessary to implement D.19-05-030.

## **Background**

On August 15, 2018, Southern California Edison Company (SCE) and Southern California Generation Coalition (SCGC) filed a petition for modification (PFM) seeking modification of SoCalGas' and San Diego Gas & Electric Company's OFO noncompliance charges, which were set by the Commission in D.15-06-004 and D.16-06-039, as modified by D.16-12-016. The PFM sought to change the current OFO penalties to \$5.00/dekatherm (dth) in Stage 4 and \$5.00/dth plus the daily balancing standby rate in Stage 5.

On April 2, 2019, SoCalGas filed a Settlement Agreement with many other active parties to resolve the issues presented in the PFM. The Settlement Agreement proposed to increase the number of OFO noncompliance charge stages, as well as modify the determination of daily imbalance tolerances, as shown in the table below.

Stage	Daily Imbalance Tolerance <sup>1</sup>	Noncompliance Charge (\$/dth)
1	Up to +/- 25%	0.25
2	Up to +/- 20%	1.00
3	Up to +/- 15%	5.00
3.1	Up to +/- 15%	10.00
3.2	Up to +/- 15%	15.00
3.3	Up to +/- 15%	20.00
4	Up to +/- 10%	25.00
5	Up to +/- 5%	25.00 plus G-IMB daily balancing standby rate in \$/dth
EFO	Zero	50.00 plus G-IMB daily balancing standby rate in \$/dth
<sup>1</sup> Negative daily imbalance tolerances for all stages are capped at up to -5% until Aliso Canyon's withdrawal capacity is available to the System Operator for load balancing.		

On May 30, 2019, the CPUC adopted D.19-05-030, which resolved the issues presented in the PFM and Settlement Agreement. For the period of June 1 through September 30, the CPUC adopted the cap on OFO noncompliance charges proposed in the PFM. For the period of October 1 through May 31, the CPUC adopted the 8-stage noncompliance charge structure proposed in the Settlement Agreement and also added the words "without constraint" to the footnote proposed by the settlement agreement. The Commission may revisit the OFO noncompliance charges before summer 2020, using data collected during summer 2019.

**Tariff Modifications**

Pursuant to D.19-05-030, Section G.1.a of Rule No. 30, Transportation of Customer-Owned Gas, is modified to include separate tables depicting applicable OFO stages, daily imbalance tolerances, and noncompliance charges effective for the periods June 1 through September 30 and October 1 through May 31, as described above.

Pursuant to D.19-05-030, these tariff modifications shall remain in effect until October 31, 2021, unless modified by a subsequent Commission decision. The revised tariff sheets are included as Attachment A.

**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 of this advice letter, which is June 20, 2019. The address for mailing or delivering a protest to the Commission is given below.

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 ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). A copy of the protest should 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](mailto:ROrtiz@SempraUtilities.com)

**Effective Date**

SoCalGas believes this advice letter is subject to Energy Division disposition and should be classified as a Tier 1 (effective pending disposition) pursuant to OPs 4 and 7 of D.19-05-030 and General Order (GO) 96-B. Therefore, SoCalGas respectfully requests that the tariff sheets submitted herein be made effective May 31, 2019, which is the date submitted.

**Notice**

A copy of this advice letter is being sent to SoCalGas' GO 96-B service list and the Commission's service lists in A.14-06-021, A.14-12-017, A.15-06-020, and A.18-07-024. Address change requests to the GO 96-B service list should be directed via e-mail to [tariffs@socalgas.com](mailto: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 via e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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Ronald van der Leeden  
Director- Regulatory Affairs

Attachments



# ADVICE LETTER SUMMARY



## ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

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

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City: State:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City: State:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

ATTACHMENT A  
Advice No. 5471

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 56321-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 12	Revised 55075-G
Revised 56322-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 13	Revised 55075-G
Revised 56323-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 14	Revised 55076-G
Revised 56324-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 15	Revised 55076-G
Revised 56325-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 16	Revised 55077-G
Revised 56326-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 17	Revised 55077-G
Revised 56327-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 18	Revised 55078-G
Revised 56328-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 19	Revised 55077-G
Revised 56329-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 20	Revised 55078-G, 52677-G
Revised 56330-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 21	Revised 55078-G
Revised 56331-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 22	Revised 52677-G, 51658-G
Revised 56332-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 23	Revised 52677-G
Revised 56333-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 24	Revised 51659-G
Revised 56334-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 25	Revised 52677-G
Revised 56335-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 26	Revised 51658-G, 51660-G
Revised 56336-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 27	Revised 51658-G
Revised 56337-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 28	Revised 51659-G, 51661-G
Revised 56338-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 29	Revised 51660-G
Original 56339-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 30	Revised 51662-G
Original 56340-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 31	Revised 51661-G
		Revised 51663-G
		Revised 51662-G
		Revised 51664-G
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		Revised 51664-G
		Revised 51666-G
		Revised 51664-G
		Revised 51665-G, 51667-G
		Revised 51665-G
		Revised 51666-G, 51668-G
		Revised 53529-G
		Revised 51666-G, 51667-G
		Revised 55695-G
		Revised 51667-G, 51668-G
		Revised 53529-G
		Revised 51668-G
		Revised 55695-G
		Revised 53529-G



ATTACHMENT A  
Advice No. 5471

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 56341-G	TABLE OF CONTENTS	Revised 56192-G
Revised 56342-G	TABLE OF CONTENTS	Revised 56316-G

Rule No. 30

Sheet 12

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Operational Flow Orders and Emergency Flow Orders

1. Operational Flow Order (OFO)

- a. The Utility System Operator’s protocol for declaring an Operational Flow Order (OFO) is described in Rule No. 41. All OFO declarations will be identified by stage that will specify a Daily Imbalance Tolerance and Noncompliance Charge per the table below. The daily balancing standby rate is not applicable to High OFOs. Pursuant to D.19-05-030, this OFO Noncompliance Charge structure shall remain in effect until October 31, 2021, unless modified by a subsequent Commission decision.

Effective June 1 – September 30

Stage	Daily Imbalance Tolerance <sup>1</sup>	Noncompliance Charge (\$/therm)
1	Up to +/-25%	0.025
2	Up to +/-20%	0.10
3	Up to +/-15%	0.50
4	Up to +/-5%	0.50
5	Up to +/-5%	0.50 plus Rate Schedule G-IMB daily balancing standby rate
EFO	Zero	5.00 plus Rate Schedule G-IMB daily balancing standby rate
<sup>1</sup> Negative daily imbalance tolerances for all stages are capped at up to -5% until Aliso Canyon’s withdrawal capacity is available without constraint to the System Operator for load balancing.		

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5471  
 DECISION NO. 19-05-030

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

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED May 31, 2019  
 EFFECTIVE May 31, 2019  
 RESOLUTION NO. \_\_\_\_\_

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Rule No. 30

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Operational Flow Orders and Emergency Flow Orders (Continued)

1. Operational Flow Order (OFO) (Continued)

a. (Continued)

Effective October 1 – May 31

Stage	Daily Imbalance Tolerance <sup>1</sup>	Noncompliance Charge (\$/therm)
1	Up to +/-25%	0.025
2	Up to +/-20%	0.10
3	Up to +/-15%	0.50
3.1	Up to +/-15%	1.00
3.2	Up to +/-15%	1.50
3.3	Up to +/-15%	2.00
4	Up to +/-10%	2.50
5	Up to +/-5%	2.50 plus Rate Schedule G-IMB daily balancing standby rate
EFO	Zero	5.00 plus Rate Schedule G-IMB daily balancing standby rate

<sup>1</sup> Negative daily imbalance tolerances for all stages are capped at up to -5% until Aliso Canyon's withdrawal capacity is available without constraint to the System Operator for load balancing.

- b. The OFO shall apply to all customers financially responsible for managing and clearing transportation imbalances (Balancing Agents), including wholesale customers, Contracted Marketers, core aggregators, California Gas Producers and the Utility Gas Procurement Department.
- c. The OFO period shall begin on the flow date(s) indicated by the Utility Gas Control Department. Generally an initial OFO event will start at Stage 1; however an OFO event may begin at any stage as deemed appropriate by the Utility Gas Control Department with the corresponding noncompliance charge.
- d. An OFO will normally be ordered with at least twelve (12) hours notice prior to the beginning of the gas day, or as necessary as dictated by operating conditions. Charges for the first day of the OFO event will not be imposed if notice is given after 8:00 p.m.\* Pacific Time the day prior to the start of the OFO event.

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5471  
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ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Operational Flow Orders and Emergency Flow Orders (Continued)

1. Operational Flow Order (OFO) (Continued)

- e. OFO and EFO compliance and charges will be based on the following for determination of daily usage quantities:
  - i. For a Noncore End-Use Customer equipped with automated meter reading device (AMR) and SDG&E's Electric & Gas Fuel Procurement Department, compliance during an OFO will be based on actual daily metered usage, and the calculation after the OFO event of any applicable noncompliance charge will be based on actual daily metered usage.
  - ii. For a Noncore End-Use Customer with non-functioning AMR meters, compliance during an OFO or EFO will be based on the Customer's actual daily metered usage; or the estimated daily usage in accordance with Section C of SoCalGas Rule 14 will be substituted for the actual daily metered usage when actual metered usage is not available.
  - iii. For a Noncore End-Use Customer without AMR capability compliance during an OFO or EFO will be based on the Customer's MinDQ.
  - iv. For the Utility Gas Procurement Department, the Daily Forecast Quantity will be used as a proxy for daily usage.
  - v. For core aggregators, their Daily Contract Quantity will be used as a proxy for daily usage.
  - vi. For a California Producer with an effective California Producer Operational Balancing Agreement, Form 6452, compliance with an OFO and EFO and calculation of any noncompliance charges will be based on the difference between scheduled receipts and measured receipts for each day of an event. OFO and EFO compliance for a California Producer with an existing non-California Producer Operational Balancing Agreement, Form 6452 access agreement will be treated consistent with the terms of that access agreement.

(Continued)

(TO BE INSERTED BY UTILITY)  
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DECISION NO. 19-05-030

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SUBMITTED May 31, 2019  
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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

G. Operational Flow Orders and Emergency Flow Orders (Continued)

3. Information regarding the System Sendout, Withdrawal Capacity and Net Withdrawals will be made available to customers on a daily basis via the EBB.
4. If a wholesale customer so requests, the Utility will nominate firm storage withdrawal volumes on behalf of the customer to match 100% of actual usage assuming the customer has sufficient firm storage withdrawal and inventory rights to match the customer's supply and demand.
5. The Utility will accept intra-day nominations to increase deliveries.
6. In all cases, current rules for monthly balancing and monthly imbalance trading continue to apply. Quantities not in compliance with the Daily Imbalance Tolerance that are purchased at the daily balancing standby rate are credited toward the monthly 92% delivery requirements. Daily balancing charges remain independent of monthly balancing charges. Noncore daily balancing and monthly balancing charges go to the Purchased Gas Account (PGA). Net revenues from core daily balancing and monthly balancing charges go to the Noncore Fixed Cost Account (NFCA). Schedule No. G-IMB provides details on monthly and daily balancing charges.

H. Accounting and Billing

1. The customer and the Utility acknowledge that on any operating day during the customer's applicable term of transportation service, the Utility may be redelivering quantities of gas to the customer pursuant to other present or future service arrangements. In such an event, the Utility and customer agree that the total quantities of gas shall be accounted for in accordance with the provisions of Rule No. 23. If there is no conflict with Rule No. 23, the quantities of gas shall be accounted for in the following order:
  - a. First, to satisfy any minimum quantities under existing agreements.
  - b. Second, after complete satisfaction of (a), then to any supply or exchange service arrangements with the customer.
  - c. Third, after the satisfaction of (a) and (b), then to any subsequently executed service agreement.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5471  
DECISION NO. 19-05-030

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

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED May 31, 2019  
EFFECTIVE May 31, 2019  
RESOLUTION NO. \_\_\_\_\_

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

H. Accounting and Billing (Continued)

2. The customer agrees that it shall accept and the Utility can rely upon, for purposes of accounting and billing, the allocation made by customer's shipper as to the quality and quantity of gas, expressed both in Decatherm and therms, delivered at each point of receipt during the preceding billing period for the customer's account. If the shipper does not make such an allocation, the customer agrees to accept the quality and quantity as determined by the Utility. All quality and measurement calculations are subject to subsequent adjustment as provided in the Utility's tariff schedules or applicable CPUC rules and regulations. Any other billing correction or adjustment made by the customer or third party for any prior period shall be based on the rates or costs in effect when the event occurred and accounted for in the period they are reconciled.
3. The Utility shall render to the customer an invoice for the services hereunder showing the quantities of gas, expressed in therms, delivered to the Utility for the customer's account, at each point of receipt and the quantities of gas, expressed in therms, redelivered by the Utility for the customer's account at each point of delivery during the preceding billing period. The Customer shall pay such amounts due hereunder within nineteen (19) calendar days following the date such bill is mailed.
4. Both the Utility and the customer shall have the right at all reasonable times to examine, at its expense, the books and records of the other to the extent necessary to verify the accuracy of any statement, charge, computation, or demand made under or pursuant to service hereunder. The Utility and the customer agree to keep records and books of account in accordance with generally accepted accounting principles and practices in the industry.

I. Gas Delivery Specifications

1. The natural gas stream delivered into the Utility's system shall conform to the gas quality specifications as provided in any applicable agreements and contracts currently in place between the entity delivering such natural gas and the Utility at the time of the delivery. If no such agreement is in place, the natural gas shall conform to the gas specifications as defined below.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5471  
DECISION NO. 19-05-030

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

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED May 31, 2019  
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RESOLUTION NO. \_\_\_\_\_



TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

I. Gas Delivery Specifications (Continued)

2. Gas delivered into the Utility's system for the account of a customer for which there is no existing contract between the delivering pipeline and the Utility shall be at a pressure such that the gas can be integrated into the Utility's system at the point(s) of receipt.
3. Gas delivered, except as defined in I.1 above, shall conform to the following quality specifications at the time of delivery:
  - a. Heating Value: The minimum heating value is nine hundred and ninety (990) Btu (gross) per standard cubic foot on a dry basis. The maximum heating value is one thousand one hundred fifty (1150) Btu (gross) per standard cubic foot on a dry basis.
  - b. Moisture Content or Water Content: For gas delivered at or below a pressure of eight hundred (800) psig, the gas shall have a water content not in excess of seven (7) pounds per million standard cubic feet. For gas delivered at a pressure exceeding of eight hundred (800) psig, the gas shall have a water dew point not exceeding 20 degrees F at delivery pressure.
  - c. Hydrogen Sulfide: The gas shall not contain more than twenty-five hundredths (0.25) of one (1) grain of hydrogen sulfide, measured as hydrogen sulfide, per one hundred (100) standard cubic feet (4 ppm). The gas shall not contain any entrained hydrogen sulfide treatment chemical (solvent) or its by-products in the gas stream.
  - d. Mercaptan Sulfur: The gas shall not contain more than three tenths (0.3) grains of mercaptan sulfur, measured as sulfur, per hundred standard cubic feet (5 ppm).
  - e. Total Sulfur: The gas shall not contain more than seventy-five hundredths (0.75) of a grain of total sulfur compounds, measured as sulfur, per one hundred (100) standard cubic feet (12.6 ppm). This includes COS and CS<sub>2</sub>, hydrogen sulfide, mercaptans and mono, di and poly sulfides.
  - f. Carbon Dioxide: The gas shall not have a total carbon dioxide content in excess of three percent (3%) by volume.
  - g. Oxygen: The gas shall not have an oxygen content in excess of two-tenths of one percent (0.2%) by volume, and customer will make every reasonable effort to keep the gas free of oxygen.
  - h. Inerts: The gas shall not contain in excess of four percent (4%) total inerts (the total combined carbon dioxide, nitrogen, oxygen and any other inert compound) by volume.

(Continued)

(TO BE INSERTED BY UTILITY)  
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 Vice President  
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 EFFECTIVE May 31, 2019  
 RESOLUTION NO. \_\_\_\_\_

Rule No. 30

Sheet 20

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

I. Gas Delivery Specifications (Continued)

3. (Continued)

- i. Hydrocarbons: For gas delivered at a pressure of 800 psig or less, the gas hydrocarbon dew point is not to exceed 45 degrees F at 400 psig or at the delivery pressure if the delivery pressure is below 400 psig. For gas delivered at a pressure higher than 800 psig, the gas hydrocarbon dew point is not to exceed 20 degrees F measured at a pressure of 400 psig.
- j. Merchantability: The gas shall not contain dust, sand, dirt, gums, oils and other substances at levels that would be injurious to Utility facilities or that would cause gas to be unmarketable.
- k. Hazardous Substances: The gas must not contain hazardous substances (including but not limited to toxic and/or carcinogenic substances and/or reproductive toxins) at concentrations which would prevent or restrict the normal marketing of gas, be injurious to pipeline facilities, or which would present a health and/or safety hazard to Utility employees and/or the general public.
- l. Delivery Temperature: The gas delivery temperature is not to be below 50 degrees F or above 105 degrees F.
- m. Interchangeability: The gas shall have a minimum Wobbe Number of 1279 and shall not have a maximum Wobbe Number greater than 1385. The gas shall meet American Gas Association's Lifting Index, Flashback Index and Yellow Tip Index interchangeability indices for high methane gas relative to a typical composition of gas in the Utility system serving the area.

Acceptable specification ranges are:

- \* Lifting Index (IL)  
IL <= 1.06
- \* Flashback Index (IF)  
IF <= 1.2
- \* Yellow Tip Index (IY)  
IY >= 0.8

- n. Liquids: The gas shall contain no liquids at or immediately downstream of the receipt point.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5471  
DECISION NO. 19-05-030

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

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED May 31, 2019  
EFFECTIVE May 31, 2019  
RESOLUTION NO. \_\_\_\_\_

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

I. Gas Delivery Specifications (Continued)

4. The Utility, at its option, may refuse to accept any gas tendered for transportation by the customer or on his behalf if such gas does not meet the specifications at the time of delivery as set out in I. 2, I. 3, and J.5, as applicable.
5. The Utility will grant specific deviations to California production from the gas quality specifications defined in Paragraph I.3 above, if such gas will not have a negative impact on system operations. Any such deviation will be required to be filed through Advice Letter for approval prior to gas actually flowing in the Utility system.
6. The Utility will post on its EBB and/or general website information regarding the available real-time Wobbe Number of gas at identified operational locations on its system.
7. Gas monitoring and enforcement hardware and software including, but not limited to, a gas chromatograph and all related equipment, communications facilities and software, identified in Exhibit A to Schedule No. G-CPS, are required, and shall be installed at each interconnection meter site where a California Producer delivers natural gas into the Utility's gas transportation system. The gas chromatograph shall monitor non-hydrogen sulfide constituents in the gas delivered, and deny access to gas that does not comply with the gas specifications set forth in the Gas Delivery Specifications, Section I.1 or I.3 above. Compliance shall be assessed using the 4- to 8-minute monitoring interval adopted in D.07-08-029 and D.10-09-001.
8. The gas chromatograph and all related equipment and software, identified in Exhibit A to Schedule No. G-CPS, shall monitor and enforce the gas quality specifications, using the 4- to 8-minute monitoring interval adopted in D.07-08-029 and D.10-09-001. Access shall be denied by the Utility on a non-latching basis after a second consecutive monitoring interval results in an alarm for gas which exceeds the non-hydrogen sulfide specifications. The gas chromatograph and all related equipment and software shall also enable the Utility to remotely gather and retain gas quality and alarm data. Where additional measures are necessary to promote or enhance safety, SoCalGas may request a deviation from the aforementioned monitoring interval requirements established by the CPUC.
9. For California Producers currently delivering gas into the Utility's transportation system without a gas chromatograph and all related equipment and software in place, as required in Rule No. 39, non-hydrogen sulfide constituents of gas will, on an interim basis, continue to be monitored and access denied under the methods currently in place, until such time as a gas chromatograph and all related equipment and software are installed and operational, subject to Rule No. 39 conditions.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5471  
DECISION NO. 19-05-030

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**Dan Skopec**  
Vice President  
Regulatory Affairs

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SUBMITTED May 31, 2019  
EFFECTIVE May 31, 2019  
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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications

1. Biogas refers to untreated gas produced through the anaerobic digestion of organic waste material. Biomethane refers to biogas that has been treated to comply with this Rule No. 30.
2. Biomethane delivered, except as defined in Section I.1, must meet the gas quality specifications set out in Section I and the biomethane-specific specifications set out in this Section J. The terms and conditions contained in Section J apply solely to suppliers of biomethane and are incremental to Section I gas quality requirements.
3. Biomethane must not contain constituents at concentrations which would prevent or restrict the normal marketing of biomethane, be at levels that would be injurious to pipeline facilities, or be at levels that would present a health and/or safety hazard to Utility employees and/or the general public.
  - a. Health Protective Constituents are constituents that may impact human health and include carcinogenic constituents (“Carcinogenic Constituents”) and non-carcinogenic constituents (“Non-Carcinogenic Constituents”).
  - b. Pipeline Integrity Protective Constituents are constituents that may impact pipeline system integrity.
4. The party interconnected to the Utility pipeline system for purposes of delivering biomethane (“Biomethane Interconnector”) shall be responsible for costs associated with periodic biomethane testing requirements contained in this Section J, but shall not be responsible for the Utility’s discretionary biomethane testing or monitoring.
5. Biomethane Quality Specifications: Biomethane to be accepted and transported in the Utility pipeline system shall be subject to periodic testing and monitoring based on the biogas source. The Trigger Level is the level where additional periodic testing and analysis of the constituent is required. The Lower Action Level, where applicable, is used to screen biomethane during the initial biomethane quality review and as an ongoing screening level during the periodic testing. The Upper Action Level, where applicable, establishes the point at which the immediate shut-off of the biomethane supply occurs.

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

5. Biomethane Quality Specifications: (Continued)

Constituent	Trigger Level mg/m <sup>3</sup> (ppm <sub>v</sub> ) <sup>i</sup>	Lower Action Level mg/m <sup>3</sup> (ppm <sub>v</sub> )	Upper Action Level mg/m <sup>3</sup> (ppm <sub>v</sub> )
<i>Health Protective Constituent Levels</i>			
<u>Carcinogenic Constituents</u>			
Arsenic	0.019 (0.006)	0.19 (0.06)	0.48 (0.15)
p-Dichlorobenzenes	5.7 (0.95)	57 (9.5)	140 (24)
Ethylbenzene	26 (6.0)	260 (60)	650 (150)
n-Nitroso-di-n-propylamine	0.033 (0.006)	0.33 (0.06)	0.81 (0.15)
Vinyl Chloride	0.84 (0.33)	8.4 (3.3)	21 (8.3)
<u>Non-Carcinogenic Constituents</u>			
Antimony	0.60 (0.12)	6.0 (1.2)	30 (6.1)
Copper	0.060 (0.02)	0.6 (0.23)	3 (1.2)
Hydrogen Sulfide	30 (22)	300 (216)	1500 (1080)
Lead	0.075 (0.009)	0.75 (0.09)	3.8 (0.44)
Methacrolein	1.1 (0.37)	11 (3.7)	53 (18)
Toluene	904 (240)	9000 (2400)	45000 (12000)
Alkyl Thiols (mercaptans)	(12)	(120)	(610)
<i>Pipeline Integrity Protective Constituent Levels<sup>ii</sup></i>			
Siloxanes	0.01 mg Si/m <sup>3</sup>	0.1 mg Si/m <sup>3</sup>	-
Ammonia	0.001 vol%	-	-
Hydrogen	0.1 vol%	-	-
Mercury	0.08 mg/m <sup>3</sup>	-	-
Biologicals	4 x 10 <sup>4</sup> /scf (qPCR per APB, SRB, IOB <sup>iii</sup> group) and commercially free of bacteria of >0.2 microns	-	-

Notes: i) The first number in this table are in milligrams per cubic meter of air (mg/m<sup>3</sup>), while the second number ( ) is in parts per million by volume (ppm<sub>v</sub>). ii) The Pipeline Integrity Protective Constituent Lower and Upper Action Limits not provided above will be established in the Commission's next AB1900 update proceeding. Until that time, Biomethane supplies that contain Pipeline Integrity Protective Constituents exceeding the Trigger Level, but lacking a Lower or Upper Action Level, will be analyzed and addressed on a case-by-case basis based on the biomethane's potential impact on pipeline system integrity. iii) APB – Acid producing Bacteria; SRB – Sulfate-reducing Bacteria; IOB – Iron-oxidizing Bacteria

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

6. Biomethane Constituent Testing shall be based on the biomethane source:

- a. Biomethane from landfills shall be tested for all Health Protective Constituents and the Pipeline Integrity Protective Constituents.
- b. Biomethane from dairies shall be tested for Ethylbenzene, Hydrogen Sulfide, n-Nitroso-di-n-propylamine, Mercaptans, Toluene, and the Pipeline Integrity Protective Constituents.
- c. Other organic waste sources, including biomethane from publicly owned treatment works (i.e., water treatment and sewage treatment plants) shall be tested for p-Dichlorobenzene, Ethylbenzene, Hydrogen Sulfide, Mercaptans, Toluene, Vinyl Chloride, and the Pipeline Integrity Protective Constituents.

7. Collective Health Risk

- a. Group 1 Compounds are Constituents with a concentration below the test detection level or below the Trigger Level.
- b. Group 2 Compounds are Constituents with a concentration at or above the Trigger Level.
- c. For Health Protective Group 2 Compounds, the collective cancer and non-cancer risk from Carcinogenic and Non-carcinogenic Constituents must be calculated by summing the Group 2 Compounds' risk.
  - i. Cancer Risk: The potential cancer for Group 2 compounds can be estimated by summing the individual potential cancer risk for each carcinogenic constituent of concern. Specifically, the cancer risk can be calculated using the ratio of the concentration of the constituent in the biomethane to the health protective ("trigger") concentration value corresponding to one in a million cancer risk for that specific constituent and then summing the risk for all the Group 2 constituents. (For reference, see CARB/OEHHA Report submitted in R.13-02-008, p. 67.)

(Continued)

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

7. Collective Health Risk (Continued)

c. (Continued)

ii. Non-Cancer Risk: The non-cancer risk can be calculated using the ratio of the concentration of the constituent in biomethane to the health protective concentration value corresponding to a hazard quotient of 0.1 for that specific non-carcinogenic constituent, then multiplying the ratio by 0.1, and then summing the non-cancer chronic risk for these Group 2 Compounds. (For reference, see CARB/OEHHA Report submitted in R.13-02-008 p. 67.)

<b>Collective from Carcinogenic and non-Carcinogenic Constituents</b>			
<b>Risk Management Levels</b>	<b>Potential Risk from Carcinogenic Constituents (chances in a million)</b>	<b>Hazard Index from Non-Carcinogenic Constituents</b>	<b>Action</b>
Trigger Level <sup>11</sup>	≥ 1.0	≥ 0.1	Periodic Testing Required
Lower Action Level <sup>2</sup>	≥ 10.0	≥ 1.0	Supply shut-in after three exceedances in 12-month period in which deliveries occur
Upper Action Level	≥ 25.0	≥ 5.0	Immediate supply shut-in

1. For any Health Protective Constituent.  
 2. Sum of the Health Protective Constituents exceeding the trigger level.

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Sheet 26

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

8. Biomethane Pre-Interconnection Testing:

- a. Prior to the injection of biomethane, the Biomethane Interconnector shall conduct two tests over a two- to four-week period for the constituents identified for that biomethane source (see Section J.6).
- b. Pre-interconnection testing will be performed by the Biomethane Interconnect using independent certified third party laboratories (Environmental Laboratory Accreditation Program (ELAP) certified, where applicable). The Utility shall be notified of the biomethane sampling and tests and have the option to observe the samples being taken. Test results will be shared with the Utility within five calendar days of the test results being received by the Biomethane Interconnector.
- c. During pre-injection testing, the Biomethane's collective potential cancer risk and non-cancer risk is calculated by summing the individual risk for each Health Protective Group 2 Compound. If the collective potential cancer risk or non-cancer risk is at or above the Lower Action Level (the cancer risk Lower Action Level is  $> 10$  in a million and the non-cancer risk Lower Action Level is a Hazard Index of  $> 1$ ), the biomethane cannot be accepted or transported by the Utility's pipeline system. The Biomethane Interconnector shall make necessary modifications to lower the collective potential cancer risk or non-cancer risk below the Lower Action Level and restart pre-injection testing. If the Health Protective Constituents are found to be below the Trigger Level or the collective cancer or non-cancer risk from the Health Protective Group 2 Compounds is below the Lower Action Level in both pre-injection tests, then the biomethane may be injected subject to compliance with the periodic testing requirements specified below.
- d. If during the pre-injection testing, any Pipeline Integrity Protective Constituents are found to be above the Lower Action Level, if applicable, the biomethane cannot be accepted or transported by the Utility's pipeline system. The Biomethane Interconnector shall make necessary modifications to lower the Pipeline Integrity Protective Constituents below the Lower Action Level and restart pre-injection testing. If the Pipeline Integrity Protective Constituents are found to be below the Trigger Level in both pre-injection tests, then the biomethane may be injected subject to compliance with the periodic testing requirements specified below.

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Sheet 28

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

10. Biomethane Shut-Off and Restart Procedures: The Biomethane Interconnector may be shut-off when the following occurs:

- a. The CPUC determines that a change in the biogas source at the facility or the upgrading equipment will potentially increase the level of any constituent over the previously measured baseline levels.
- b. Testing indicates constituents are exceeding allowable concentration levels:
  - i. The collective cancer or non-cancer risk from Health Protective Group 2 Compounds is found at or above the Lower Action Level three times in a 12-month period in which deliveries occur.
  - ii. The collective cancer or non-cancer risk from Health Protective Group 2 Compounds is found at or above the Upper Action Level.
  - iii. If applicable, a Pipeline Integrity Protective Constituent is found at or above the Lower Action Level three times in a 12-month period in which deliveries occur.
  - iv. The biomethane contains constituents at concentrations which prevent or restrict the normal marketing of biomethane, are at levels that are injurious to pipeline facilities, or are at levels that present a health and/or safety hazard to Utility employees and/or the general public.
- c. In order to restart injection after a Biomethane Interconnector has been shut-off, the Biomethane Interconnector shall test the biomethane using independent certified third party laboratories (ELAP certified where applicable). Deliveries can then resume, subject to the periodic testing requirements in Section J.9, if the test indicates: (1) the biomethane complies with the gas quality specifications contained in Section I of this Rule; (2) the collective cancer and non-cancer risk of Health Protective Group 2 Compounds is below the Lower Action Level; and, if applicable, (3) the Pipeline Integrity Protective Constituents are below the Lower Action Level. Thereafter, constituents shall be reevaluated by the Utility for eligibility for less frequent testing.

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

K. Termination or Modification

1. If the customer breaches any terms and conditions of service of the customer's service agreement or the applicable tariff schedules and does not correct the situation within thirty (30) days of notice, the Utility shall have the right to cease service and immediately terminate the customer's applicable service agreement.
2. If the contract is terminated, either party has the right to collect any quantities of gas or money due them for transportation service provided prior to the termination.

L. Regulatory Requirements

1. Any gas transported by the Utility for the customer which was first transported outside the State of California shall have first been authorized under Federal Energy Regulatory Commission (FERC) regulations, as amended. Both parties recognize that such regulations only apply to pipelines subject to FERC jurisdiction, and do not apply to the Utility. The customer shall not take any action which would subject the Utility to the jurisdiction of the FERC, the Economic Regulatory Administration or any succeeding agency. Any such action shall be cause for immediate termination of the service arrangement between the customer and the Utility.
2. Transportation service shall not begin until both parties have received and accepted any and all regulatory authorizations necessary for such service.

M. Warranty and Indemnification

1. The customer warrants to the Utility that the customer has the right to deliver gas hereunder and that such gas is free from all liens and adverse claims of every kind. Customer will indemnify, defend and save the Utility harmless against all loss, damage, injury, liability and expense of any character where such loss, damage, injury, liability or expense arises directly or indirectly out of any demand, claim, action, cause of action or suit brought by any person, association or entity asserting ownership of or any interest in the gas tendered for transportation hereunder, or on account of royalties, payments or other charges applicable before or upon delivery of gas hereunder.
2. The customer shall indemnify, defend and save harmless the Utility, its officers, agents, and employees from and against any and all loss, costs (including reasonable attorneys' fees), damage, injury, liability, and claims for injury or death of persons (including any employee of the customer or the Utility), or for loss or damage to property (including the property of the customer or the Utility), which occurs or is based upon an act or acts which occur while the gas is deemed to be in the customer's control and possession or which results directly or indirectly from the customer's performance of its obligations arising pursuant to the provisions of its service agreement and the Utility's applicable tariff schedules, or occurs based on the customer-owned gas not meeting the specifications of Sections I or J of this rule.

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Sheet 31

TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

N. OFO Trading\*

1. *Trading Scheduled Quantities\**

- a. *Customers may arrange to trade scheduled quantities. The trades are to be arranged outside of the EBB and communicated to the Utility via a trade form.*
- b. *Customers may trade scheduled quantities between End Use contracts only by adjusting scheduled quantities after Cycle 6 has been processed.*
- c. *Trades will only be available for OFO days.*
- d. *Trades must be submitted to the Utility's scheduling department via email or fax by 9 PM Pacific Clock Time one business day following the Gas Day for which the OFO was declared.*
- e. *The Utility may file an expedited Tier 2 Advice Letter to suspend this tariff provision if curtailments are more severe or more frequent due to the offering of this service. Protests and responses to any such Advice Letter would be due within 5 business days, and the Utility's reply would be due within 2 business days from the end of the protest period.*

2. *Trading Daily Imbalances\**

- a. *California Producer cash-outs on OFO days will be delayed until 9:00 p.m. Pacific Clock Time one business day following the Gas Day pending submittal of the imbalance trade. If the imbalance is not traded, it will be cashed out.*
- b. *California Producers may arrange to trade daily OFO imbalances with other California Producers. The trades are to be arranged outside of the EBB and communicated to the Utility via a trade form after Cycle 6 has been processed.*
- c. *Trades will only be available for OFO days.*
- d. *Trades must be submitted to the Utility's scheduling department via email or fax by 9 PM Pacific Clock Time one business day following the Gas Day for which the OFO was declared.*
- e. *The Utility may file an expedited Tier 2 Advice Letter to suspend this tariff provision if curtailments are more severe or more frequent due to the offering of this service. Protests and responses to any such Advice Letter would be due within 5 business days, and the Utility's reply would be due within 2 business days from the end of the protest period.*

O. Temporary Settlement Term

- 1. The Sections of this Rule italicized and followed by an asterisk (\*) are temporary and will end upon the expiration of the term in the settlement approved by D.16-12-015 and modified by D.18-11-009. Specifically, that settlement term will conclude upon the earlier of: (1) any superseding decision or order by the Commission, (2) return of Aliso Canyon to at least 450 MMcfd of injection capacity and 1,395 MMcfd of withdrawal capacity, or (3) the implementation date of a final decision in A.18-07-024, SoCalGas' 2020 Triennial Cost Allocation Proceeding.

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