

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 26, 2019

**Advice Letter 5477-G**

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

**SUBJECT: Modification to Pipeline Interconnection Tariff to Change the Minimum Heating Value for Biomethane and Implement Procedures for Reduced Siloxane Testing Requirements, Pursuant to D.19-05-018**

Dear Mr. van der Leeden:

Advice Letter 5477-G is effective as of July 7, 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  
Tel: 213.244.2009  
Fax: 213.244.4957

[RvanderLeeden@semprautilities.com](mailto:RvanderLeeden@semprautilities.com)

June 7, 2019

Advice No. 5477  
(U 904G)

Public Utilities Commission of the State of California

**Subject: Modification to Pipeline Interconnection Tariff to Change the Minimum Heating Value for Biomethane and Implement Procedures for Reduced Siloxane Testing Requirements, Pursuant to Decision (D.) 19-05-018**

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

### **Purpose**

This submittal modifies Rule No. 30 to show compliance with the 970 Btu/scf minimum heating value for biomethane, pursuant to Ordering Paragraph (OP) 2, and implement the procedures for reduced siloxane testing requirements, pursuant to OP 3, in D.19-05-018 (the Decision).

### **Background**

On May 20, 2019, the CPUC issued the Decision regarding biomethane tasks in Senate Bill (SB) 840. The Decision addresses the actions required of the Commission, as set forth in Public Utilities Code Section 784.1. That law requires the CPUC to reevaluate its requirements and standards adopted pursuant to Section 25421 of the Health and Safety Code for injecting biomethane into common carrier pipelines. The law further states that, if appropriate, the Commission shall change its biomethane requirements and standards or adopt new requirements and standards, giving due deference to the conclusions and recommendations made by the California Council on Science and Technology's SB 840 study.

Pursuant to OP 2 of the Decision:

San Diego Gas & Electric Company and Southern California Gas Company -- in compliance with Ordering Paragraph 1 -- shall submit their respective Tier 2 advice letters to the Commission's Energy Division, within 30 days of the effective date of this decision, to change their respective gas tariffs to show compliance with the 970 BTU/scf minimum heating value for biomethane so long as the current minimum Wobbe Number requirements and all other requirements of utility gas tariffs are met.

Furthermore, pursuant to OP 3 of the Decision:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation shall submit their respective Tier 2 advice letters to the Commission's Energy Division, within 30 days of the effective date of this decision, proposing to modify their pipeline interconnection tariffs to implement the procedures for reduced siloxane testing requirements, as explicitly stated within Section 3.3.3 of this Decision. The Commission may further evaluate whether yard waste and additional types of food waste should be eligible for reduced siloxane testing in the future.

The tariff revisions, identified below and included as Attachment A, are those necessary to comply with the Decision.

### **Modification of Rule No. 30 – Transportation of Customer-Owned Gas**

1. Subsection I.3.a. changed the minimum heating value from 990 to 970 Btu/scf. (Sheet 19)
2. Added Subsection J.6.d. that interconnector may certify that their biogas is sourced from dairy or other animal manure, agricultural waste, forest residues, and/or commercial food processing waste and that no siloxane containing products are used in the facility that can enter the gas. (Sheet 24)
3. Added Subsection J.8.e., the procedures for reduced siloxane testing requirements. (Sheet 26)
4. Added Subsection J.9.d. to describe the standard procedure for full testing requirements for periodic testing of the Pipeline Integrity Protective Constituents that reduced siloxane testing would be exempt from under J.6.d. and J.8.e. as noted. (Sheet 27)
5. Added the reference to D.19-05-018 as one of the decisions intended to implement the biomethane rules. (Sheet 29)

**Protests**

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 received within 20 days of the date of this Advice Letter, which is June 27, 2019. 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](mailto: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](mailto:ROrtiz@semprautilities.com)

**Effective Date**

SoCalGas believes that this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective pending staff approval) pursuant to General Order (GO) 96-B. Therefore, SoCalGas respectfully requests that the tariffs submitted herein become effective on July 7, 2019, which is 30 days from 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 list in R.13-02-008. 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: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

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

ATTACHMENT A  
Advice No. 5477

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 56400-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 19	Revised 56328-G
Revised 56401-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 24	Revised 56333-G
Revised 56402-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 25	Revised 56334-G
Revised 56403-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 26	Revised 56335-G
Revised 56404-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 27	Revised 56336-G
Revised 56405-G	Rule No. 30, TRANSPORTATION OF CUSTOMER-OWNED GAS, Sheet 29	Revised 56338-G
Revised 56406-G	TABLE OF CONTENTS	Revised 56375-G
Revised 56407-G	TABLE OF CONTENTS	Revised 56380-G

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 seventy (970) 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.

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(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5477  
DECISION NO. 19-05-018

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

(TO BE INSERTED BY CAL. PUC)  
SUBMITTED Jun 7, 2019  
EFFECTIVE Jul 7, 2019  
RESOLUTION NO. \_\_\_\_\_



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.
- d. Biomethane Interconnectors that certify that their biogas is sourced only from dairy, animal manure, agricultural waste, forest residues, and/or commercial food processing waste, and that products containing siloxanes are not included in the biogas and not used at their facilities in any way that allows siloxane to enter the biomethane, shall have reduced siloxane testing requirements, as described in Section J.8.e. If the certifications identified above are no longer true, then the Biomethane Interconnector must notify the Utility and the full siloxane testing requirement shall apply.

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 risk 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.)

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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

8. Biomethane Pre-Interconnection Testing: (Continued)

- 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.
- e. Per Section J.6.d, biomethane certified for reduced siloxane testing will be as follows:
  - i. If the pre-injection testing siloxane levels are below or at the Trigger Level of  $0.01 \text{ mg Si/m}^3$ , then no periodic siloxane testing is required under Section J.9.d.
  - ii. If the pre-injection testing siloxanes level exceed the Trigger Level of  $0.01 \text{ mg Si/m}^3$ , then quarterly testing is required for one year, and if none of those samples are above the Lower Action Level of  $0.1 \text{ mg Si/m}^3$ , then no periodic siloxane testing is required under Section J.9.d.
  - iii. If the siloxanes are above the Lower Action Level of  $0.1 \text{ mg Si/m}^3$ , then the Section J.6.d biomethane certification for reduced testing is no longer applicable and the Biomethane Interconnector will be required to comply with the periodic testing requirements for siloxane under Section J.9.d.

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(TO BE INSERTED BY UTILITY)  
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DECISION NO. 19-05-018

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Rule No. 30  
TRANSPORTATION OF CUSTOMER-OWNED GAS

Sheet 27

(Continued)

J. Biomethane Delivery Specifications (Continued)

9. Biomethane Periodic Testing:

a. Group 1 Constituent Testing

- i. A Group 1 Compound shall be tested once every 12-month period in which deliveries occur. Thereafter, if the Group 1 Compound is found below the Trigger Level during two consecutive annual periodic tests, the Group 1 Compound may be tested once every two year-period in which deliveries occur.
- ii. A Group 1 Compound will become a Group 2 Compound if testing indicates a concentration at or above the Trigger Level.

b. Group 2 Compound Testing

- i. A Group 2 Compound shall be tested quarterly (at least once every three-month period in which deliveries occur).
- ii. A Group 2 Compound will become a Group 1 Compound if testing indicates a concentration below the Trigger Level during four consecutive tests.

c. Collective Risk from Carcinogenic and Non-carcinogenic Constituents:

- i. If four consecutive quarterly tests demonstrate that the Health Protective Group 2 Compound's collective cancer and non-cancer risk is below the Lower Action Level, monitoring can be reduced to once every 12-month period in which deliveries occur.
- ii. If annual testing demonstrates that the Health Protective Group 2 Compound's collective cancer or non-cancer risk is at or above the Lower Action Level, then testing will revert to quarterly.

d. Pipeline Integrity Protective Constituents

- i. Constituents shall be tested once every 12-month period in which deliveries occur. Thereafter, constituents found below the Trigger Level during two consecutive annual periodic tests, the constituent may be tested once every two year-period in which deliveries occur.
- ii. If the constituent was tested above the Trigger Level, then it will be tested quarterly.
- iii. If there are four consecutive quarterly tests below the Lower Action Level, then it will be reduced to once every 12-month period in which deliveries occur.

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(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5477  
DECISION NO. 19-05-018  
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ISSUED BY  
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TRANSPORTATION OF CUSTOMER-OWNED GAS

(Continued)

J. Biomethane Delivery Specifications (Continued)

11. Testing Procedures: The Utility shall collect samples at the receipt point utility meter. The Biomethane Interconnector shall collect samples upstream of the utility meter. Samples will be analyzed by independent certified third party laboratories (ELAP certified where applicable). Testing for Health Protective Constituents shall be by the methods specified in Table V-4 of CARB/OEHHA Report submitted in R.13-02-008 and adopted in D.14-01-034. Testing for Pipeline Integrity Protective Constituents shall be by the methods approved in D.14-01-034. Retesting shall be allowed to verify and validate the results. The cost of retesting shall be borne by the entity requesting the retest.
12. Continuous Monitoring of Upgrading Process Integrity: Absent an agreement otherwise, the Biomethane Interconnector's compliance with the Utility's continuously monitored Section I gas quality specifications shall be used as an indicator that the upgrading system is effectively conditioning and upgrading the biomethane. If the indicator(s) used to continuously monitor biomethane constituent levels indicates the biomethane has not been sufficiently conditioned and upgraded, the Utility may accelerate the biomethane periodic testing schedule and initiate testing. Accelerated periodic testing shall count toward the recommended periodic testing requirements described in Section J.9.
13. Recordkeeping and Reporting Requirements will be as prescribed in Commission D.14-01-034 and as specified in the CARB/OEHHA Report submitted in R.13-02-008.
14. Prohibition of Biomethane from Hazardous Waste Landfills: Hazardous waste landfills ("Hazardous Waste Landfills") include all contiguous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste. The facility may consist of one or more treatment, transfer, storage, resource recovery, disposal, or recycling hazardous waste management units, or combinations of these units. Biomethane from Hazardous Waste Landfills, including landfills permitted by the Department of Toxic Substances Control, will not be purchased, accepted or transported. Before a Biomethane Interconnector can interconnect with the Utility's system, the Biomethane Interconnector must demonstrate and certify to the Utility's satisfaction that the biogas was not collected from a Hazardous Waste Landfill.
15. The biomethane rules in this section are intended to implement D.14-01-034 and D.19-05-018, including rules regarding constituent concentration standards, monitoring and testing requirements, and reporting and recordkeeping requirements.

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DECISION NO. 19-05-018

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(TO BE INSERTED BY UTILITY)  
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 DECISION NO. 19-05-018

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

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Jun 7, 2019  
 EFFECTIVE Jul 7, 2019  
 RESOLUTION NO. \_\_\_\_\_

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Direct Assistance Program Balancing Account (DAPBA) .....	52583-G,52584-G
Integrated Transmission Balancing Account (ITBA) .....	49313-G

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVISE LETTER NO. 5477  
 DECISION NO. 19-05-018

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

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Jun 7, 2019  
 EFFECTIVE Jul 7, 2019  
 RESOLUTION NO. \_\_\_\_\_