

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 5650G
As of July 27, 2020

Subject: Modification of Schedule No. G-PAL and Rule No. 41 Pursuant to Decision (D.) 20-02-045
(Triennial Cost Allocation Proceeding)

Division Assigned: Energy

Date Filed: 06-24-2020

Date to Calendar: 06-29-2020

Authorizing Documents: D2002045

Disposition:	Accepted
Effective Date:	07-24-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Ray Ortiz

213-244-3837

ROrtiz@socalgas.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



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@socalgas.com

June 24, 2020

Advice No. 5650
(U 904 G)

Public Utilities Commission of the State of California

Subject: Modification of Schedule No. G-PAL and Rule No. 41 Pursuant to Decision (D.) 20-02-045 (Triennial Cost Allocation Proceeding)

Southern California Gas Company (SoCalGas) hereby submits for Commission approval additional revisions to its tariffs, applicable throughout its service territory, as shown on Attachment A. SoCalGas seeks to modify Schedule No. G-PAL, Operational Hub Services, and Rule No. 41, Utility System Operation, consistent with D.20-02-045.

Background

On March 30, 2020, SoCalGas submitted Advice No. (AL) 5609 to present the tariff changes necessary to implement D.20-02-045, which addressed SoCalGas' Triennial Cost Allocation Proceeding (TCAP). D.20-02-045 adopted, among other things: 1) demand forecasts for core and noncore customers; 2) embedded costs for transmission and storage functions; 3) Long Run Marginal Costs (LRMC) for customer costs using the Rental Method; 4) a modified version of a proposal developed by the Commission's Energy Division to allocate storage capacity based on the shifting inventory capacity of the Aliso Canyon Storage Facility; 5) several requests related to regulatory accounts and other administrative processes; 6) extension of the Second Daily Balancing Settlement through 2022; and 7) SoCalGas' proposal to implement Senate Bill 711. AL 5609 was approved by the Commission on April 29, 2020, and the resulting rates and tariffs were timely implemented on May 1, 2020.

In AL 5609, SoCalGas included modifications to Schedule No. G-TBS, Transaction Based Storage Service, to: 1) clarify that the tariff is closed to new subscription until further notice except for contracts with Southwest Gas Corporation and The City of Long Beach to meet Commission authorized wholesale core storage requirements; 2)

modify the Component Rate Caps for Inventory, Injection, and Withdrawal to be consistent with the embedded costs of storage authorized by Ordering Paragraph (OP) 4 of D.20-02-045; and 3) clarify that SoCalGas will allocate a portion of all core storage assets, rather than unbundled storage capacities, to the City of Long Beach and Southwest Gas, in a manner consistent with D.20-02-045. In AL 5609, SoCalGas did not address related changes to Schedule No. G-PAL to likewise close the tariff to new subscriptions. Further, SoCalGas did not address the status of the Operational Hub, as defined in Rule No. 41, as a result of the temporary suspension of the Unbundled Storage Program. Accordingly, SoCalGas submits this AL to address these two issues.

Proposed Modifications to Schedule No. G-PAL and Rule No. 41

As noted above, SoCalGas modified Schedule No. G-TBS in AL 5609 to clarify that the tariff is closed to new subscription until further notice, except for wholesale customers with core parity requirements. This modification was proposed as a result of D.20-02-045's adoption of the Energy Division Staff Proposal on Storage Capacity Allocation which, among other things, temporarily suspended SoCalGas' Unbundled Storage Program until such point that the Commission increases available inventory capacity at the Aliso Canyon Storage Field.¹ While Schedule No. G-TBS is the primary rate schedule governing SoCalGas' Unbundled Storage Program, Schedule No. G-PAL addresses other Operational Hub services, primarily interruptible gas parking and gas loaning services. With the temporary suspension of the Unbundled Storage Program, the Operational Hub no longer has capacity available to it to offer these parking and loaning services. Therefore, SoCalGas includes in Attachment A proposed revisions to Schedule No. G-PAL to clarify that the schedule is closed to new subscription until further notice.

As a result of the closing of both Schedule Nos. G-TBS and G-PAL to new subscriptions, SoCalGas requests the Commission authorize additional, related revisions to Rule No. 41. SoCalGas requests that certain non-marketing activities previously performed by the Operational Hub be conducted by the System Operator until such point as Schedule Nos. G-TBS and G-PAL are no longer suspended to new subscriptions. Further, because the System Operator would now be conducting such activities, SoCalGas proposes to clarify the prohibition in Rule No. 41 on sharing non-public, customer specific information with the Operational Hub, which will temporarily be irrelevant and unnecessary. Proposed modifications to Section 2 and 9 of Rule No. 41 are shown in red and underlined text below. Revised tariff sheets are included in Attachment A.

2. The term "Utility System Operator" as defined in Rule No.1 denotes all of the applicable departments within Southern California Gas Company and San Diego Gas & Electric Company responsible for the physical and commercial

¹ D.20-02-045 at p. 103, OP 5.

operation of the pipeline and storage systems specifically excluding the Utility Gas Procurement Department.

Due to storage capacity allocations adopted in Commission Decision (D.) 20-02-045 and the resulting indefinite suspension of sales and marketing activities conducted by the Operational Hub in support of Schedule Nos. G-TBS and G-PAL, the activities involved in meeting any physical flowing gas supply requirements as determined by the Gas Control Department, formerly are conducted by the Operational Hub, are conducted by the System Operator.

9. The Gas Control Department shall be physically separated from those departments engaging in marketing/sales activities, shall have no knowledge of or involvement in any marketing/sales activities, and shall be strictly concerned with the operation, safety, and integrity of the pipeline and storage system. The Operational Hub shall have no access to non public customer specific information other than the information it obtains through its own contracts, negotiations, and discussions with customers. The Gas Control Department may communicate with the Operational Hub to discuss changes to the Southern System minimum flow requirements, circumstances that might require the Operational Hub to obtain supplies, and options to ensure minimum flowing supplies requirements are met. Discussions may also take place with regard to short-term operational needs for flowing supplies to support system reliability elsewhere on the system that may arise to support operations and maintenance (O&M) activities, related pipeline integrity work, or to address a force majeure event such as a line breakage or failure.

Due to the recent indefinite suspension of sales and marketing activities formerly conducted by the Operational Hub under Schedule Nos. G-TBS and G-PAL as a result of the storage capacity allocations adopted in D.20-02-045 and the subsequent reassignment of activities involved in meeting any physical flowing gas supply requirements to the System Operator, these restrictions will not be in effect until the Commission authorizes the resumption of the sales and marketing transactions currently suspended for Schedule Nos. G-TBS and G-PAL and the Operational Hub resumes responsibility for minimum flow requirements.

If the Commission increases the available inventory capacity at the Aliso Canyon Storage Field such that SoCalGas may resume the Unbundled Storage Program, allowing for resumption of storage sales and marketing activities, SoCalGas will revise Rule No. 41 to reinstate the Operational Hub, including activities temporarily being conducted by the System Operator.

SoCalGas does not believe customers would be harmed by the modifications to Rule No. 41 sought in this AL. Due to the lack of a sales and marketing function,

customer-specific information cannot be used for revenue generation. The proposed modifications are compliant with the Commission's Affiliate Transaction Rules and SoCalGas' Remedial Measures. SoCalGas described these tariff revisions at its Annual Utility Customer Forum, held on May 13, 2020 in compliance with Rule No. 41, Section 22. SoCalGas did not receive any feedback from Forum participants.

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. The protest must be made in writing and must be received within 20 days of the date of this AL or July 14, 2020. 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 CPUC's Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this AL via U.S. mail or fax. Please submit protests or comments to this AL via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Ray Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: ROrtiz@socalgas.com

Effective Date

SoCalGas believes that this AL is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this AL become effective on July 24, 2020, which is 30 calendar days after the date submitted.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A.18-07-024. Address change requests to the GO 96-B should be directed via e-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 via e-mail at Process_Office@cpuc.ca.gov.

/s/ Ronald van der Leeden
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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss 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

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. 5650

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 57739-G	Schedule No. G-PAL, OPERATIONAL HUB SERVICES, Sheet 1	Revised 45363-G
Revised 57740-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 1	Revised 55198-G
Revised 57741-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 4	Revised 55701-G
Revised 57742-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 5	Revised 55083-G
Revised 57743-G	TABLE OF CONTENTS	Revised 57687-G
Revised 57744-G	TABLE OF CONTENTS	Revised 57593-G
Revised 57745-G	TABLE OF CONTENTS	Revised 57734-G

Schedule No. G-PAL
OPERATIONAL HUB SERVICES

Sheet 1

APPLICABILITY

This tariff is closed to new subscription until further notice.

This rate schedule applies to interruptible gas parking and gas loaning services (“Operations Park and Loan Services”) to any qualified creditworthy party, referred herein as “Customer”, as provided by the Utility System Operator using its system capacity. Gas parking is the temporary storage of gas on the Utility’s system and gas loaning is the temporary lending of gas from the Utility’s system. For purposes of this tariff, the Utility Gas Procurement Department is a Customer.

TERRITORY

The receipt and delivery points of service are entirely within the state of California, and are specified in the Operations Park and Loan Services Agreement (Schedule O of the Master Services Contract).

RATES

Rates for service will be negotiated on an individual transaction basis and shall depend on current market conditions. The rates shall fall within the following range:

Minimum Rate (per transaction)	\$50 minimum
Maximum Rate (per Dth)	
Operations Parking	\$1.63 *
Operations Loaning	\$1.63 *

The minimum rate reflects the incremental administrative and overhead costs necessary to carry out an Operations Parking or Operations Loaning Transaction.

The maximum rates are set equivalent to the maximum rate for inventory-only service in the Utility’s G-TBS schedule.

- * An additional fuel charge may be levied if the requested service will cause an incremental fuel cost for storage compression. Customer will be notified of the need for incremental fuel in advance of any service being provided, in which case Customer shall pay the In-Kind Energy charge specified in Schedule No. G-TBS.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5650
 DECISION NO. 20-02-045

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 SUBMITTED Jun 24, 2020
 EFFECTIVE Jul 24, 2020
 RESOLUTION NO. _____

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Rule No. 41
UTILITY SYSTEM OPERATION

Sheet 1

The Utility’s operational organization, procedures, and reporting requirements are described herein.

STRUCTURE, PROCEDURES, AND PROTOCOLS

1. The mission of the Utility System Operator is to maintain system reliability and integrity while minimizing costs at all times.
2. The term “Utility System Operator” as defined in Rule No.1 denotes all of the applicable departments within Southern California Gas Company and San Diego Gas & Electric Company responsible for the physical and commercial operation of the pipeline and storage systems specifically excluding the Utility Gas Procurement Department.

Due to storage capacity allocations adopted in Commission Decision (D.) 20-02-045 and the resulting indefinite suspension of sales and marketing activities conducted by the Operational Hub in support of Schedule Nos. G-TBS and G-PAL, the activities involved in meeting any physical flowing gas supply requirements as determined by the Gas Control Department, formerly conducted by the Operational Hub, are conducted by the System Operator.

3. The Gas Control Department is the sole authority for: operating the pipeline and storage system, developing the system sendout (i.e., demand) forecasts to be used for purposes of determining on a daily basis Southern System minimum flow requirements, and for issuing Operational Flow Orders (“OFOs”). The Gas Control Department is responsible for calculating forecasted sendout and physical storage injection capacity. For every nomination cycle, the Gas Scheduling Department shall calculate the system capacity as the sum of forecasted sendout, physical storage injection capacity, off-system scheduled quantities, and, through October 31, 2018, incremental injection capacity; and where the incremental injection capacity is the sum of the prior cycle scheduled withdrawal and withdrawal capacity used for balancing.

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(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5650
 DECISION NO. 20-02-045

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 SUBMITTED Jun 24, 2020
 EFFECTIVE Jul 24, 2020
 RESOLUTION NO. _____

Rule No. 41

Sheet 4

UTILITY SYSTEM OPERATION

(Continued)

STRUCTURE, PROCEDURES, AND PROTOCOLS (Continued)

9. The Gas Control Department shall be physically separated from those departments engaging in marketing/sales activities, shall have no knowledge of or involvement in any marketing/sales activities, and shall be strictly concerned with the operation, safety, and integrity of the pipeline and storage system. The Operational Hub shall have no access to non-public customer-specific information other than the information it obtains through its own contracts, negotiations, and discussions with customers. The Gas Control Department may communicate with the Operational Hub to discuss changes to the Southern System minimum flow requirements, circumstances that might require the Operational Hub to obtain supplies, and options to ensure minimum flowing supplies requirements are met. Discussions may also take place with regard to short-term operational needs for flowing supplies to support system reliability elsewhere on the system that may arise to support operations and maintenance (O&M) activities, related pipeline integrity work, or to address a force majeure event such as a line breakage or failure.

Due to the recent indefinite suspension of sales and marketing activities formerly conducted by the Operational Hub under Schedule Nos. G-TBS and G-PAL as a result of the storage capacity allocations adopted in D.20-02-045 and the subsequent reassignment of activities involved in meeting any physical flowing gas supply requirements to the System Operator, these restrictions will not be in effect until the Commission authorizes the resumption of the sales and marketing transactions currently suspended for Schedule Nos. G-TBS and G-PAL and the Operational Hub resumes responsibility for minimum flow requirements.

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PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES

10. The Utility shall issue an RFO at least annually for proposals enabling the Utility to manage its minimum flow requirements to the Southern System delivery points for system reliability. The Utility, at its sole discretion, may enter into transactions with one or more RFO respondents to provide the best value to the Utility's customers based upon the Utility's evaluation criteria. The RFO shall not be a binding offer by the Utility to enter into a contract for any product(s) or service(s). The Utility shall reserve the right to reject any or all offers submitted in response to the RFO.

11. Any contract with an RFO respondent will be conditioned on the Utility obtaining the prior approval of the California Public Utilities Commission (CPUC) acceptable to the Utility. Respondent offers will be considered non-binding until a definitive agreement is reached between the respondent and the Utility, and the CPUC issues an order approving the definitive agreement memorializing the terms and conditions of the transaction between the respondent and the Utility.

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(TO BE INSERTED BY UTILITY)
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DECISION NO. 20-02-045

ISSUED BY
Dan Skopec
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
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Rule No. 41
UTILITY SYSTEM OPERATION

Sheet 5

(Continued)

PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES (Continued)

12. Except for transactions related to the Utility Gas Procurement Department's role as "provider of last resort" (addressed below in Section 13), any gas commodity purchases and sales between the Operational Hub and the Utility Gas Procurement Department or an affiliate of Sempra Energy will occur through an Independent Party, where the counterparties are not known until after the transaction is completed. "Independent Party" refers to gas trading exchanges such as Intercontinental Exchange (ICE), gas brokers who have been instructed to provide no preference to Sempra affiliates or to the Utility Gas Procurement Department, or open auctions available to all qualified parties conducted by the Operational Hub, in which gas purchases or sales are made with counter-parties that are not known until after the transaction is completed.
13. The Utility Gas Procurement Department will act on a best-efforts basis to provide gas supplies based on the Operational Hub's request if called upon as a provider of last resort. "Provider of last resort" relates to the circumstance in which the Operational Hub has attempted to use all other available tools, has entered the open market for gas commodity purchases, has been unsuccessful in meeting its need to receive a required volume of flowing supplies at a specific location, and system reliability is therefore jeopardized. If the Operational Hub has exhausted its other options available to acquire the required flowing supplies, it will contact the Utility Gas Procurement Department and request that it provide gas to meet the remaining minimum flow requirement. Such requests will occur as soon as possible during the actual flow day. The Utility Gas Procurement Department will charge the Operational Hub the actual incremental costs incurred to provide the specific supplies. Verification that the Utility has followed this procedure will be included in the annual compliance report provided to the CPUC in conjunction with the Advice Letter addressed in Section 26 below.
14. Standards and criteria for spot purchases or sales of gas commodity for which standards and criteria are not specified in CPUC-approved contracts shall be as follows:
- a. Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the day-ahead market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the Natural Gas Intelligence (NGI) Avg Index for the flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the NGI Avg Index for the flow date for the relevant trading point.
 - b. Should it be necessary for the Operational Hub to purchase or sell spot supplies of gas in the intraday market, the Operational Hub shall be deemed to have made reasonable (1) spot purchases if the purchase price is less than or equal to 110% of the NGI High for the current flow date for the relevant trading point and (2) spot sales if the sale price is greater than or equal to 90% of the NGI Low for the current flow date for the relevant trading point.

(Continued)

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 5650
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(TO BE INSERTED BY UTILITY)

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(TO BE INSERTED BY UTILITY)
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ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
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The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

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Hazardous Substance Cost Recovery Account (HSCRA)	40875-G, 40876-G,40877-G
Gas Cost Rewards and Penalties Account (GCRPA)	40881-G
Pension Balancing Account (PBA)	56828-G,56829-G
Post-Retirement Benefits Other Than Pensions Balancing Account (PBOPBA) ..	56830-G,56831-G
Research Development and Demonstration Surcharge Account (RDDGSA).....	40888-G
Demand Side Management Balancing Account (DSMBA).....	45194-G,41153-G
Direct Assistance Program Balancing Account (DAPBA)	52583-G,52584-G
Integrated Transmission Balancing Account (ITBA)	49313-G

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5650
 DECISION NO. 20-02-045

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 SUBMITTED Jun 24, 2020
 EFFECTIVE Jul 24, 2020
 RESOLUTION NO. _____