

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 19, 2020

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

Subject: Disposition of Southern California Gas Company's Advice Letter Regarding the Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003

Dear Mr. van der Leeden:

Southern California Gas Company (SoCalGas) Advice Letter (AL) 5672 requesting establishment of a Residential Uncollectibles Balancing Account (RUBA) and a Residential Disconnection Protections Memorandum Account (RDPMA), is approved with an effective date of August 30, 2020.

The appendix of this letter provides a summary of the protest to AL 5672, SoCalGas' response and Energy Division's disposition of the issues.

Please contact Ankit Jain at ankit.jain@cpuc.ca.gov or at (415) 703-5322 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "ER" followed by "FOR".

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

cc: EDTariffUnit
David Cheng, Attorney for TURN

Appendix: Energy Division Technical Review and Analysis

Background

On June 11, 2020, the Commission adopted Decision (D.)20-06-003 (decision), which proposed measures meant to reduce the number of residential disconnections and improve the reconnection process for disconnected customers.¹ Ordering Paragraph (OP) 95 of the decision also permitted the establishment of a memorandum account to allow for tracking of costs associated with implementing the requirements of the decision. OP's 89 and 91 of the decision also directed the IOUs to establish a new two-way balancing account for tracking of uncollectible residential charges by submitting a Tier 2 advice letter (AL). Southern California Gas Company (SoCalGas) filed AL 5672 on July 31, 2020, which requested establishment of a two-way Residential Uncollectibles Balancing Account (RUBA) and a Residential Disconnection Protections Memorandum Account (RDPMA).²

AL 5672 requested that the RUBA have two subaccounts: (1) an Uncollectible Cost Subaccount, which would record the difference between the authorized uncollectible revenues charged to residential customers and actual bad debt expense, and (2) an Arrearage Management Plan (AMP) Subaccount to record the debt forgiven under the AMP program. The initial AL filing requested that the amounts recorded to both of these subaccounts would be recovered through customers' gas transportation rates.

In addition, AL 5672 requested that the RDPMA be used to record the operations and maintenance (O&M) and capital-related costs associated with implementing the customer protections authorized in D.20-06-003, as well as waived reconnection charges. The amounts recorded in the RDPMA would be reviewed for reasonableness in SoCalGas' next general rate case (GRC).

TURN Protest and SoCalGas Reply

Protest

The Utility Reform Network (TURN) filed a timely protest on August 20, 2020,³ and had two objections to AL 5672 as filed. First, TURN argued that balances in the AMP Subaccount of the RUBA should be recovered through the Public Purpose Program (PPP) Charge using the California Alternative Rates for Energy (CARE) allocator instead of through gas transportation rates. Second, TURN asserted that the RDPMA tariff needs to be amended to specify that only *incremental* costs associated with implementing the customer protections authorized by D.20-06-003 should be recorded to the RDPMA rather than all costs.

TURN reasoned that AMP should be considered a PPP because it is intended to provide assistance to CARE and FERA customers and is therefore similar in purpose to other assistance programs. TURN specified that this treatment should be limited to the AMP Subaccount and that balances in the

¹ See Decision (D.)20-06-003, "Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for the Larger California-Jurisdictional Energy Utilities," in Rulemaking (R.) 18-07-005, "Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs."

² See SoCalGas Advice Letter 5672, "Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003."

³ See "TURN's Protest to Southern California Gas Company ("SoCalGas") Advice Letter ("AL") 5672 Regarding the Establishment of the Residential Uncollectible Balancing Account ("RUBA") and Residential Disconnection Protections Memorandum Account ("RDPMA"), Pursuant to Decision (D.) 20-06-003."

Uncollectible Cost Subaccount should be recovered through gas transportation rates. Furthermore, because the PPP charge is non-bypassable, TURN argued that recovering AMP-related costs through the PPP Charge would prevent certain customers (e.g. NEM customers) from avoiding payment for the program costs.

TURN claimed that the language in SoCalGas' original advice filing did not specify that costs recorded to the RDPMA would be incremental to previously authorized costs. Moreover, TURN reasoned that as written, the proposed RDPMA would allow SoCalGas to recover costs that have already been recovered in rates, thus providing a windfall to shareholders.⁴

SoCalGas Reply

SoCalGas did not oppose either recommendation from TURN and amended AL 5672 to reflect both recommended changes, accordingly, in their reply to TURN's comments.⁵ Substitute sheets were submitted on August 27, 2020 reflecting TURN's requested revisions to the RUBA and RDPMA.⁶

Consistency with Arrearage Management Plan (AMP) Resolution

Concurrent with consideration of AL 5672, establishment of the AMP program and cost recovery of associated forgiven debt was addressed through the resolution process. Resolution E-5114, which addressed AMP proposals from Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and SoCalGas, was adopted on December 17, 2020. Resolution E-5114 ordered electric costs associated with AMP to be recovered through the electric PPP charge from all customers using the CARE allocator, and gas costs to be recovered through gas transportation rates.⁷

Furthermore, the resolution addressed the following:

- (1) The circumstances under which Community Choice Aggregator (CCA) customers and Core Aggregation Transportation (CAT) service customers may enroll in AMP,
- (2) Which charges may be forgiven for those customers, and
- (3) How remittance payments will be made to participating CCAs.

Specifically, Resolution E-5114 determined that CCA customers may participate in AMP and their generation charges may be forgiven, in which case the electric IOU will provide remittance payments on a monthly basis for generation-related costs recovered through the electric PPP charge (though this is not a relevant issue for SoCalGas, since it is not an electric IOU). More relevantly, customers receiving CAT services from Core Transport Agents and other third-party gas providers will only be eligible for forgiveness of gas charges owed to SoCalGas (in other words, only the transportation-related gas costs).

⁴ *Id.* at 3.

⁵ See "Reply of Southern California Gas Company to The Utility Reform Network's Protest to Advice No. 5672 Regarding the Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003."

⁶ See "Substitute Sheets for Southern California Gas Company (SoCalGas) Advice No. (AL) 5672," submitted on August 27, 2020.

⁷ See "Resolution E-5114. Approval of Arrearage Management Plans for Large Investor-Owned Electric and Gas Utilities."

SoCalGas Supplemental ALs 5672-A and 5672-B

SoCalGas submitted AL 5672-A, a partial supplement to AL 5672, on December 29, 2020 to comply with the direction set forth in Resolution E-5114 to recover costs for forgiven gas arrearages through gas transportation rates.⁸ However, this supplemental AL states that costs will be recovered on an Equal Percent of Authorized Margin basis. SoCalGas submitted an additional partial supplement, AL 5672-B, on January 5, 2021 to clarify that the costs of forgiven arrearages will be recovered through gas transportation rates on an Equal Cents Per Therm basis.⁹

Disposition

Energy Division has reviewed AL 5672, and the TURN protest, and finds the issue raised by TURN regarding incremental costs to be reasonable and adequately addressed by SoCalGas in its subsequent substitute sheet filings. TURN's argument that recovery of the AMP uncollected debt should be through the PPP charge has been made moot by Resolution E-5114. As such, AL 5672 is in compliance with D.20-06-003 and consistent with Resolution E-5114 as supplemented by AL 5672-A on December 29, 2020 and AL 5672-B on January 5, 2021 and is therefore approved with an effective date of August 30, 2020.

Should you have any questions, please contact Ankit Jain at Ankit.Jain@cpuc.ca.gov or at (415) 703-5322.

⁸ See SoCalGas AL 5672-A, "Partial Supplement - Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003."

⁹ See SoCalGas AL 5672-B, "Partial Supplement - Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003."



Joseph Mock
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Regulatory Affairs

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Los Angeles, CA 90013-1011
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January 5, 2021

Advice No. 5672-B
(U 904 G)

Public Utilities Commission of the State of California

Subject: Partial Supplement - Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003

This submittal partially supplements Advice No. (AL) 5672, submitted on July 31, 2020, and AL 5672-A, submitted on December 29, 2020. Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) modifications to its Preliminary Statement Part V – Balancing Accounts, applicable throughout its service territory, as shown on Attachment A.

Purpose

This submittal complies with Ordering Paragraph (OP) 91 of D.20-06-003, *Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for the Larger California-Jurisdictional Energy Utilities*, to establish SoCalGas' RUBA and RDPMA.

Background

On December 13, 2018, the Commission adopted the interim rules in D.18-12-013 which set forth various emergency interim measures to reduce the number of residential customer disconnections and to improve the reconnection processes for disconnected customers. The adopted interim rules were to take effect immediately on an emergency basis to provide rapid relief while the Commission considered longer term solutions.

On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.¹ On March 17, 2020, the

¹ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

Commission's Executive Director sent a letter to the California energy, water and communications corporations addressing emergency customer protections to support customers affected by the COVID-19 State of Emergency. On April 16, 2020, the Commission issued Resolution (Res.) M-4842 ratifying directions provided by the Commission's Executive Director on March 17, 2020, and ordered energy, water, and communication corporations to retroactively apply customer protection measures described in D.19-07-015 from March 4, 2020 onward during the COVID-19 pandemic. Through Res. M-4842, the Commission extended to California customers the emergency customer protections in D.19-07-015 and D.19-08-025, through April 16, 2021, with an option to extend.

On June 11, 2020, the Commission approved D.20-06-003, adopting with modifications the interim rules in D.18-12-013 and establishing other process and program changes to address residential disconnections and reconnections. To the extent any measures adopted in D.20-06-003 conflict with the measures adopted in Res. M-4842, the measures shall become effective after the current moratorium on disconnections is lifted by the Commission. Recognizing a need for transparency and cost recovery, D.20-06-003 permits the investor owned utilities (IOUs) to establish a memorandum account to track the implementation costs associated with implementing the requirements of this decision. Further, OP 91 of D.20-06-003 requires the IOUs to submit a Tier 2 Advice Letter to establish a new two-way balancing account to track the costs of uncollectible charges in rates associated with residential customers.

SoCalGas submitted AL 5672 in compliance with OP 89 and 91 of D.20-06-003. On August 27, 2020, SoCalGas submitted substitute sheets for AL 5672, which included in the RUBA that balances should be recovered through the Public Purpose Program (PPP) charge using the California Alternative Rates for Energy (CARE) allocator in connection with SoCalGas' annual PPP surcharge Advice Letter submittal.

Per direction from the Energy Division, SoCalGas submitted AL 5672-A. Res. E-5114 specifies that the gas uncollectible associated with Arrearage Management Plans (AMP) should be recovered through gas transportation rates. In compliance with Res. E-5114, SoCalGas revised its RUBA, Sheet 2.

In AL 5672-A, SoCalGas indicated it would recover the costs of forgiven gas arrearages through gas transportation rates on an Equal Percent of Authorized Margin (EPAM) basis. Res. E-5114 directs the IOUs to recover the costs of forgiven gas arrearages through gas transportation rates on an Equal Cents Per Therm (ECPT) basis. SoCalGas hereby revises its RUBA by replacing the EPAM basis with the ECPT basis.

Proposed Tariff Revisions

SoCalGas proposes revisions to its RUBA, Sheet 2, Section 6, Disposition, by replacing the balance will be allocated on an Equal Percent of Authorized Margin (EPAM) basis with an **Equal Cents Per Therm (ECPT)** basis.

The proposed revised preliminary statement sheet is shown on Attachment A.

Protest

In accordance with General Order (GO) 96-B, Section 7.5.1, SoCalGas requests that the Commission maintain the original protest and comment periods designated in AL 5672 and waive the protest period for this partial supplemental Advice Letter submittal.

Effective Date

SoCalGas submits this Tier 2 Advice Letter (effective after staff approval) pursuant to GO 96-B. It is submitted in accordance with OP 91 of D.20-06-003. Therefore, SoCalGas respectfully requests this Advice Letter be approved as soon as practicable and made effective July 11, 2020, which is the effective date of D.20-06-003.

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.18-07-005. Address change requests to the GO 96-B service list 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/ Joseph Mock

Joseph Mock

Business Manager - 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. 5672-B

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Original 58449-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, RESIDENTIAL UNCOLLECTIBLE BALANCING ACCOUNT (RUBA) , Sheet 2	Original 57872-G Original 58410-G
Revised 58450-G	TABLE OF CONTENTS	Revised 58411-G Revised 58448-G
Revised 58451-G	TABLE OF CONTENTS	Revised 58412-G Revised 58032-G

PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS
RESIDENTIAL UNCOLLECTIBLE BALANCING ACCOUNT (RUBA)

Sheet 2

(Continued)

5. Accounting Procedures – AMP Subaccount

SoCalGas will maintain the AMP Subaccount of the RUBA by making entries, net of FF&U as applicable, at the end of each month as follows:

- a. A debit entry equal to the debt forgiven under the AMP;
- b. An entry to amortize the AMP Subaccount of the RUBA as authorized by the Commission; and
- c. An entry equal to interest on the average balance in the account during the month, calculated in the manner described in Preliminary Statement, Part I, J.

6. Disposition

SoCalGas will amortize the balance in the RUBA in customers' gas transportation rates in connection with its annual regulatory account update advice letter submittal. The balance will be allocated on an Equal Cents Per Therm (ECPT) basis.

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(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 5672-B
DECISION NO. 20-06-003

ISSUED BY
Dan Skopec
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
SUBMITTED Jan 5, 2021
EFFECTIVE Aug 30, 2020
RESOLUTION NO. _____

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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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(TO BE INSERTED BY UTILITY)
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