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



### Southern California Gas Company GAS (Corp ID 904) Status of Advice Letter 5720G As of December 9, 2020

Subject: Update of Public Purpose Program Surcharge Rates Effective January 1, 2021

Division Assigned: Energy

Date Filed: 10-30-2020

Date to Calendar: 11-04-2020

Authorizing Documents: None

Disposition: Accepted

Effective Date: 01-01-2021

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

October 30, 2020

Advice No. 5720 (U 904 G)

Public Utilities Commission of the State of California

**Subject:** Update of Public Purpose Program Surcharge Rates Effective January 1, 2021

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

#### **Purpose**

This Advice Letter submits updated Public Purpose Program (PPP) surcharge rates to be effective January 1, 2021. As described below, the PPP surcharge rates are based on the adopted volumes and allocation changes pursuant to Decision (D.) 20-02-045 in SoCalGas' 2020 Triennial Cost Allocation Proceeding (TCAP).

#### **Background**

This submittal is being made in compliance with Ordering Paragraph (OP) 22 of D.04-08-010, in Rulemaking (R.) 02-10-001, to update on an annual basis SoCalGas' surcharge rates to fund PPP programs, as authorized by Assembly Bill (AB) 1002. AB 1002 directs the Commission to establish a gas surcharge annually to fund certain natural gas related public purpose programs: energy efficiency, low-income assistance programs such as California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA), and research and development (R&D). Revenues collected from the surcharge are remitted to the California Department of Tax and Fee Administration (CDTFA), previously known as State Board of Equalization (BOE) and are ultimately appropriated back to the utilities or other entities designated by the Commission to administer public purpose programs.

The Commission issued D.04-08-010 that addressed both the Phase 1 surcharge implementation issues and Phase 2 administration of public purpose R&D. Pursuant to OP 10, SoCalGas is using the surcharge formula adopted in the decision for calculating the gas PPP surcharge rates. SoCalGas is using information provided by the Commission's Energy Division for calculating the gas surcharge rate as it relates to (1) the Commission and CDTFA administrative costs, (2) SoCalGas' portion of the statewide R&D budget, and (3) a three-year average of the interstate pipeline volumes from 2017 through 2019 to be used in computation of the surcharge rates as directed in D.04-08-010. With the approval of SoCalGas' TCAP, SoCalGas is using the adopted TCAP volumes in calculating 2021 surcharge rates for the customer classes as shown in the table below.

Billing Determinants	Volumes (Mth)				
	For Allocating Non-	For Allocating			
	CARE Costs	CARE Costs			
Residential	2,344,165	1,686,545			
G10-Commerical and Industrial	988,302	984,422			
Nonresidential Air Conditioning	416	416			
Gas Engine	22,302	22,302			
Subtotal Core	3,355,185	2,693,684			
G30-Commerical and Industrial	1,541,533	1,541,533			
Total	4,896,718	4,235,217			

Values may not add to total due to rounding.

Also, with D.09-11-006, SoCalGas eliminated the allocation of R&D costs to customer classes that do not pay the Gas Public Purpose Programs Surcharge rate and updated the Equal Percent Marginal Cost allocator to Equal Percent Authorized Margin. Pursuant to Advice No. 5111-A and Resolution G-3532, SoCalGas will eliminate the ESA Program Memorandum Account (ESAPMA).

#### Revised Schedule No. G-PPPS

Schedule No. G-PPPS, as shown in Attachment A, updates the PPP surcharge rates for the costs detailed in the table below. SoCalGas' projection of low-income program costs for 2021 reflects the estimated 2021 CARE customer subsidy costs and funding authorized in D.16-11-022, since a decision is pending for Application (A.) 19-11-006, Approval of Low-Income Assistance Programs and Budgets for Program Years 2021-2026.

The non-low-income components of the PPP surcharge rates reflect the 2021 R&D budget of \$11.9 million, forecasted \$0.35 million R&D funding undercollection compared to the prior year's authorized budget level, and the 2021 energy efficiency funding as authorized in Advice No. 5510.

## Proposed 2021 PPP Revenue Requirement \$000

		<u> </u>	lon-CARE				
	CARE Costs	•	Costs	Admin Costs		Total	
2021 Program Budgets				7 10.11			
2021 Program Budgets							
ESAP		\$	_			\$	_
CARE	\$ 187,534.7	Ψ	_			\$	187,534.7
EE	\$ 107,334.7	æ	112 220 6				· ·
		\$	113,328.6			\$	113,328.6
RDD		\$	11,884.3			\$	11,884.3
Administration costs							
CARE	\$ 10,091.1					\$	10,091.1
BOE				\$	523.9	\$	523.9
CPUC				\$	-	\$	-
Balancing Account Amortization -							
(Over) / under collection							
DSMBA		\$	(3,592.4)			\$	(3,592.4)
DAPBA		\$	_			\$	-
CAREA	\$ 3,934.8					\$	3,934.8
RDDGSA (excluding interest)		\$	346.5			\$	346.5
Total PPP Costs	\$ 201,560.5	\$	121,967.0	\$	523.9	\$	324,051.5

Values may not add to total due to rounding.

The PPP rates are listed for CARE and Non-CARE customers by major customer class and reflect changes to the CARE and R&D components of the gas PPP surcharge. The 2021 PPP surcharge revenue requirement is lower by \$39.2 million (or 10.8 percent) compared to the 2020 PPP surcharge revenue requirement, which is primarily due to a decrease in funding for ESA per D.20-08-033,¹ increased forecasted CARE subsidies, increase in funding for Energy Efficiency,² and an increase in amortization of the California Alternate Rates for Energy Account (CAREA).

The impact of the updated PPP surcharge rates, by major customer class, is shown on Attachment B.

The comparison of the current PPP revenue requirement to the proposed 2021 PPP revenue requirement as shown in the table above is detailed in Attachment C.

<sup>1</sup> Pursuant to OP 9 of D.20-08-033, unspent funds will be used for ESA to fund bridge period activities before any new revenue collection.

<sup>&</sup>lt;sup>2</sup> Energy Efficiency funding of \$108.9 million for the 2021 cycle, \$2.0 million for Statewide Marketing, Education, and Outreach funding approved in Advice No. 5560 and true up adjustments of \$2.4 million to reconcile the funding approved in the 2020 Annual Budget Advice Letter (ABAL) submittal, which was approved after the respective year's PPP surcharge rates were submitted: Advice No. 5510 approved \$108.9 million but \$106.6 million was approved for 2020 rates.

Summary of the authorized allocation methods used for each of the programs:

<u>Program</u>	Allocation Method
Energy Efficiency	Direct Benefits Allocation
CARE	Equal Cents Per Therm
ESA	Direct Benefits Allocation
R&D	Equal Percent of Authorized Margin

#### **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 received within 20 days of the date this Advice Letter was submitted with the Commission, which is November 19, 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 Energy Division Tariff Unit (<a href="EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a>). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this Advice Letter via U.S. mail or fax. Please submit protests or comments to this Advice Letter via e-mail to the address shown below on the same date it is mailed or e-mailed 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@socalgas.com

#### **Effective Date**

SoCalGas believes that this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. This submittal is consistent with D.04-08-010 and, therefore, SoCalGas respectfully requests that this submittal be approved on November 29, 2020, which is 30 days after the date submitted, for implementation and inclusion in rates effective on January 1, 2021.

#### **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.12-08-010, A.12-07-003, A.11-05-018, A.08-07-022, A.08-05-025, and A.08-02-001. Address change requests to the GO 96-B service list should be directed by e-mail to <a href="mailto:tariffs@socalgas.com">tariffs@socalgas.com</a> or call (213) 244-2837. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by e-mail at Process Office@cpuc.ca.gov.

Work papers have been provided to the Energy Division pursuant to D.04-08-010. Copies of the workpapers can be made available to other parties upon request by contacting the e-mail address in the Protest section above.

/s/ Ronald van der Leeden Ronald van der Leeden Director – Regulatory Affairs

Attachments





# California Public Utilities Commission

# ADVICE LETTER UMMARY



LIVEROTOTIETT						
MUST BE COMPLETED BY UT	ILITY (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 WATER = Water	(Date Submitted / Received Stamp by CPUC)					
Advice Letter (AL) #:	Tier Designation:					
Subject of AL:						
Keywords (choose from CPUC listing):						
AL Type: Monthly Quarterly Annu-						
if AL submitted in compliance with a Commissi	on order, indicate relevant Decision/Resolution #:					
Does AL replace a withdrawn or rejected AL?	f so, identify the prior AL:					
Summarize differences between the AL and th	e 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 ta	riff sheets:					

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: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a>

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 B Advice No. 5720

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 58235-G	PRELIMINARY STATEMENT, PART II, SUMMARY OF RATES AND CHARGES, Sheet 10	Revised 58007-G
Revised 58236-G	Schedule No. G-PPPS, PUBLIC PURPOSE PROGRAMS SURCHARGE, Sheet 1	Revised 56866-G
Revised 58237-G	TABLE OF CONTENTS	Revised 58160-G
Revised 58238-G	TABLE OF CONTENTS	Revised 58234-G

Revised LOS ANGELES, CALIFORNIA CANCELING Revised CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO. 58235-G 58007-G

#### PRELIMINARY STATEMENT **PART II SUMMARY OF RATES AND CHARGES**

Sheet 10

(Continued)

#### TAX SURCHARGE TO FUND PUBLIC PURPOSE PROGRAMS

Schedule G-PPPS	Tax Surcharge					
	For all service, per meter, per month					
Customer Served Under the	-	-				
Following Rate Schedules	CARE Customer***	Non-CARE Customer				
-	(¢/therm)	(¢/therm)				
Core						
Residential	2.278	7.037	R,R			
Commercial/Industrial	5.953	10.712	I,I			
Gas Air Conditioning	19.682	24.441	I,I			
Gas Engine	N/A	9.923	I			
Natural Gas Vehicle	N/A	4.759	I			
Noncore						
Commercial/Industrial	N/A	5.344	I			

#### SURCHARGE TO FUND PUC UTILITIES REIMBURSEMENT ACCOUNT

Schedule G-SRF

#### TRANSPORTED GAS MUNICIPAL SURCHARGE

Schedule G-MSUR

Outside the City of Los Angeles	1.3720%
Within the Cities of San Buenaventura (Ventura), Huntington Beach,	
Visalia, Bakersfield, and Long Beach	2.3720%*
Within the City of Los Angeles	2.0000%

<sup>\*</sup> Includes 1% franchise fee surcharge for City of Ventura customers pursuant to D. 07-10-024, for City of Huntington Beach customers pursuant to Resolution G-3452, City of Visalia pursuant to Advice No. 4418, City of Bakersfield pursuant to Advice No. 4569, and City of Long Beach pursuant to Advice No. 5392.

(Continued)

ISSUED BY (TO BE INSERTED BY UTILITY) Dan Skopec ADVICE LETTER NO. 5720 DECISION NO. 04-08-010Vice President Regulatory Affairs

(TO BE INSERTED BY CAL. PUC) Oct 30, 2020 SUBMITTED Jan 1, 2021 EFFECTIVE RESOLUTION NO.

10H6

Revised Revised CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

58236-G 56866-G

#### Schedule No. G-PPPS PUBLIC PURPOSE PROGRAMS SURCHARGE

Sheet 1

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#### **APPLICABILITY**

Applicable to all gas sales and transportation services rendered under all tariff rate schedules authorized by the Commission. Customers will have a gas public purpose program (PPP) surcharge as a separate line item on their bills unless they are exempt\* (e.g. Electric Generation including cogeneration, Enhanced Oil Recovery, Wholesale service, and consumption of natural gas which California is prohibited from taxing under the United States Constitution or the California Constitution, as referenced in Section 896 of the Public Utilities Code. (See also the California Energy Resources Surcharge Regulation Sections 2315 and 2316 as identifying exempt customers.) California Alternate Rates for Energy (CARE) customers will receive the surcharge excluding CARE program costs along with applicable customers receiving sales for street lighting.

#### **TERRITORY**

This schedule is applicable within the entire territory served by Utility.

#### **RATES**

PPP Surcharge\*\*
For all service, per meter, per month

	Tot all scrvice, pe	or meter, per monur
Customer Served Under the	-	•
Following Rate Schedules	CARE Customer***	Non-CARE Customer
-	(¢/therm)	(¢/therm)
Core		
Residential	2.278	7.037
Commercial/Industrial	5.953	10.712
Gas Air Conditioning	19.682	24.441
Gas Engine	N/A	9.923
Natural Gas Vehicle	N/A	4.759
Noncore		
Commercial/Industrial	N/A	5.344

<sup>\*</sup> Commission Resolution G-3303, dated December 21, 2000, references Sections 896, 897, and 898 of Assembly Bill (AB) 1002 regarding consumers of natural gas who are exempt from the tax surcharge. Section 896 states "Consumption means the use or employment of natural gas. Consumption does not include the use or employment of natural gas to generate power for sale or use of gas for enhanced oil recovery, natural gas utilized in cogeneration technology projects to produce electricity, or natural gas that is produced in California and transported on a proprietary pipeline. Consumption does not include the consumption of natural gas which this state is prohibited from taxing under the United States Constitution or the California Constitution." Section 897 states "Nothing in this article impairs the rights and obligations of parties to contracts approved by the Commission, as the rights and obligations were interpreted as of January 1, 1998." Section 898 is in reference to a municipality, district, or

(Continued)

ISSUED BY (TO BE INSERTED BY CAL. PUC) (TO BE INSERTED BY UTILITY) Oct 30, 2020 5720 **Dan Skopec** SUBMITTED ADVICE LETTER NO. Jan 1, 2021 DECISION NO. 04-08-010 **EFFECTIVE** Vice President Regulatory Affairs RESOLUTION NO. 1H6

LOS ANGELES, CALIFORNIA CANCELING Revised

Revised

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

58237-G 58160-G

52283-G,52284-G,52285-G,52286-G

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	Utilities Reimbursement Account	
G-MHPS	Surcharge to Fund Public Utilities Commission	
	Master Metered Mobile Home Park Gas Safety	
	Inspection and Enforcement Program	
G-MSUR	Transported Gas Municipal Surcharge	
G-PAL	Operational Hub Services	
G-CPS	California Producer Service	
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GO-DERS	Distributed Energy Resources Services52279-G,52280-G,52281-G,52282-G	

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 5720 DECISION NO. 04-08-010

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

(TO BE INSERTED BY CAL. PUC) Oct 30, 2020 SUBMITTED Jan 1, 2021 EFFECTIVE RESOLUTION NO.

Revised Revised CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

58238-G 58234-G

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#### **TABLE OF CONTENTS**

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.

<u>GENERAL</u>	Cal. P.U.C. Sheet No.
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Part III Cost Allocation and Revenue Requirement	57354-G,57355-G,57356-G
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Hazardous Substance Cost Recovery Account (HSCRA)	
Gas Cost Rewards and Penalties Account (GCRPA)	
Pension Balancing Account (PBA)	
Post-Retirement Benefits Other Than Pensions Balancing Acco	
Research Development and Demonstration Surcharge Account	
Demand Side Management Balancing Account (DSMBA)	
Direct Assistance Program Balancing Account (DAPBA)	
Integrated Transmission Balancing Account (ITBA)	

(Continued)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 5720 \\ \text{DECISION NO.} & 04\text{-}08\text{-}010 \\ \end{array}$ 

ISSUED BY

Dan Skopec

Vice President

Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
SUBMITTED Oct 30, 2020

EFFECTIVE Jan 1, 2021

RESOLUTION NO.

#### Attachment B Advice No. 5720

#### **SUMMARY OF PPP SURCHARGE RATES**

# SOUTHERN CALIFORNIA GAS COMPANY SCG PPPS Update for 1-1-2021 Rates

	Customer		CAR	E Customers		Non-CARE Customers			
	Class	1/1/2020	1/1/2021	\$/th Change	% Change	1/1/2020	1/1/2021	\$/th Change	% Change
		\$/th	\$/th	\$/th	0/0	\$/th	\$/th	\$/th	0/0
	(a)	(b)	(c)	( d)	( e )	(f)	(g)	(h)	(i)
	<u>Core</u>								
1.	Residential	\$0.07423	\$0.02278	(\$0.05145)	-69%	\$0.10252	\$0.07037	(\$0.03215)	-31%
2.	Commercial/Industrial	\$0.04888	\$0.05953	\$0.01065	22%	\$0.07718	\$0.10712	\$0.02995	39%
3.	Gas Air Conditioning	\$0.09051	\$0.19682	\$0.10631	117%	\$0.11880	\$0.24441	\$0.12561	106%
4.	Gas Engine	N/A	N/A	N/A	N/A	\$0.07434	\$0.09923	\$0.02489	33%
5.	Natural Gas Vehicle	N/A	N/A	N/A	N/A	\$0.02829	\$0.04759	\$0.01930	68%
	Noncore								
6.	Commercial/Industrial	N/A	N/A	N/A	N/A	\$0.03330	\$0.05344	\$0.02014	60%
		1/1/2020	1/1/2021	Rev Change	% Change				
		\$000	\$000	\$000	%				
7.	Total PPP Revenue	\$363,299	\$324,051	(\$39,248)	(11%)				

#### Attachment C Advice No. 5720

### ESTIMATED REVENUE REQUIREMENT/RATE CHANGE SOUTHERN CALIFORNIA GAS COMPANY SCG PPPS Update Filing for 1-1-2021 Rates

	Current \$000				Proposed \$000			Revenue Requirement Incr/(Decr) \$000		
	<u>CARE</u>	Non-CARE	<u>Total</u>	<b>CARE</b>	Non-CARE	<u>Total</u>	<u>CARE</u>	Non-CARE	<u>Total</u>	
ESAP <sup>1/</sup>		134,473	134,473		_	_	_	(134,473)	(134,473)	
CARE <sup>1/</sup>	132,418	,	132,418	187,535		187,535	55,117	-	55,117	
$\mathrm{EE}^{2/}$		93,255	93,255		113,329	113,329	-	20,074	20,074	
RDD		10,844	10,844		11,884	11,884	-	1,040	1,040	
DSMBA		_	_		(3,592)	(3,592)	-	(3,592)	(3,592)	
DAPBA		-	-		-	-	-	-	-	
CAREA	(18,276)		(18,276)	3,935		3,935	22,211	-	22,211	
RDDGSA		(33)	(33)		347	347	-	380	380	
CARE Admin	10,091		10,091	10,091		10,091	_	-	_	
BOE Admin	•	527	527	•	524	524	-	(3)	(3)	
CPUC Admin		-	-		-	-	-	- ` ′	-	
Total 1/1/20 Change	\$ 124,233	\$ 239,066	\$ 363,299	\$ 201,561	\$ 122,491	\$ 324,051	\$ 77,328	\$ (116,576) \$	(39,248)	

<sup>&</sup>lt;sup>1/</sup> SoCalGas' projection of program costs for 2021 reflects the estimated 2021 CARE customer subsidy costs and funding authorized in Decision (D.) 16-11-022, since a decision is pending for Application 19-11-006, Approval of Low-Income Assistance Programs and Budgets for Program Years 2021-2026. Pursuant to Ordering Paragraph 9 of D.20-08-033, unspent funds will be used for ESA to fund bridge period activities before any new revenue collection.

<sup>&</sup>lt;sup>2/</sup> 2021 EE revenue requirement pursuant to Advice Letter (AL) 5510, including Statewide Marketing, Education, and Outreach funding pursuant to AL 5560.