

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 5817G
As of November 16, 2021

Subject: Balance Transfer of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) into the Residential Uncollectible Balancing Account (RUBA) in Compliance with Decision (D.) 20-06-003

Division Assigned: Energy

Date Filed: 06-01-2021

Date to Calendar: 06-04-2021

Authorizing Documents: D2006003

Disposition:	Accepted
Effective Date:	07-01-2021

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Joseph Mock
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.3718
Fax: 213.244.4957
JMock@socalgas.com

June 1, 2021

Advice No. 5817
(U 904 G)

Public Utilities Commission of the State of California

Subject: Balance Transfer of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) into the Residential Uncollectible Balancing Account (RUBA) in Compliance with Decision (D.) 20-06-003

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC) the transfer of the CPPMA balance to the RUBA along with corresponding revisions to its Preliminary Statements Part V, Balancing Accounts, and Part VI, Memorandum Accounts, applicable throughout its service territory, as shown on Attachment A.

Purpose

The purpose of this submittal is to seek approval from the Commission to transfer the portion of its incremental residential uncollectible expense in CPPMA into the RUBA. The balance transfer is in accordance with Ordering Paragraph (OP) 92 of D.20-06-003.

Background

On April 16, 2020, the Commission adopted Resolution (Res.) M-4842 to ratify the directions provided in the Commission's Executive Director's March 17, 2020 letter. Res. M-4842 orders electric, gas, communications, and water and sewer corporations in California to: 1) retroactively apply the customer protections adopted in D.19-07-015, and 2) submit a Tier 2 Advice Letter describing all reasonable and necessary actions to implement emergency customer protections to support California customers. Res. M-4842 further authorizes the electric, gas, communications, and water and sewer corporations to establish a CPPMA to track incremental costs associated with complying with the Resolution.

On May 22, 2020, SoCalGas submitted Advice No. (AL) 5604-B (a full supplement replacing AL 5604-A in its entirety), and on June 4, 2020, SoCalGas submitted AL 5604-C (a partial supplement) in compliance with Res. M-4842.

On June 16, 2020, the Commission issued D.20-06-003 (Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for the Larger California-Jurisdictional Energy Utilities) designed to reduce the number of residential customer disconnections and improve reconnection processes for disconnected customers applicable to the large investor owned utilities (IOUs).¹

On July 31, 2020, SoCalGas submitted AL 5672 and subsequent supplemental Advice Letters,² in compliance with OPs 89 and 91 of D.20-06-003 directing SoCalGas to submit a Tier 2 Advice Letter to establish a two-way balancing account to create more transparency and accurately reflect the actual costs of uncollectible charges in rates.

Request to Transfer CPPMA Residential Uncollectibles to RUBA

SoCalGas requests to transfer the incremental gas residential customer uncollectible expense of \$8.9M from the CPPMA to the RUBA in accordance with OP 92, which states:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company may submit Tier 2 Advice Letters to address the issue of transferring the portion of their COVID-19 Pandemic Protections Memorandum Account related to uncollectibles from residential disconnections into the two-way balancing account.

This amount represents the recorded incremental uncollectible expense recorded in the CPPMA for the period March 4, 2020³ through August 29, 2020, including corresponding interest through April 2021.⁴

¹ The large IOUs are Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and SoCalGas.

² On December 29, 2020, SoCalGas submitted AL 5672-A, and on January 5, 2021, SoCalGas submitted AL 5672-B.

³ ALs 5604-B and 5604-C were approved on June 22, 2020 with an effective date of March 4, 2020.

⁴ AL 5672, AL 5672-A, and AL 5672-B were approved on April 19, 2021 with an effective date of August 30, 2020 for the RUBA. The incremental residential uncollectible expense recorded in the CPPMA for the period August 30, 2020 (effective date of the RUBA) through March 31, 2021 has already been transferred to the RUBA as of April 30, 2021. In addition, all subsequent incremental residential uncollectible expense will be recorded directly in the RUBA.

**SOUTHERN CALIFORNIA GAS COMPANY
INCREMENTAL UNCOLLECTIBLE EXPENSE TRANSFER FROM CPPMA TO RUBA
FOR THE PERIOD MARCH 4, 2020 THROUGH AUGUST 29, 2020**

	Total
Revenues	\$ (3,989,299)
Uncollectible Expense	12,908,162
Net Uncollectible Expense (Incremental)	\$ 8,918,863
Interest	8,028
	\$ 8,926,891

Upon approval, SoCalGas will transfer the amounts stated above and will amortize the projected year-end balances in the RUBA – Uncollectible Cost Subaccount in customers’ gas transportation rates in connection with its annual regulatory account update Advice Letter submittal by October 15, 2021.

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 must be received within 20 days of the date of this Advice Letter, which is June 21, 2021. The address for mailing or delivering a protest to the Commission is given below.

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

A copy of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). 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 addresses 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
E-mail: Tariffs@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. Therefore, SoCalGas respectfully requests that this submittal become effective on July 1, 2021, 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.18-03-011. 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
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. 5817

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 58881-G	PRELIMINARY STATEMENT - PART V - BALANCING ACCOUNTS, RESIDENTIAL UNCOLLECTIBLE BALANCING ACCOUNT (RUBA) , Sheet 1	Original 57871-G
Revised 58882-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT, COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA), Sheet 1	Revised 58570-G
Revised 58883-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT, COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA), Sheet 2	Original 57606-G
Revised 58884-G	TABLE OF CONTENTS	Revised 58880-G
Revised 58885-G	TABLE OF CONTENTS	Revised 58479-G
Revised 58886-G	TABLE OF CONTENTS	Revised 58585-G

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

Sheet 1

1. Purpose

The RUBA is an interest bearing, two-way balancing account recorded on SoCalGas' financial statements, pursuant to Decision (D.) 20-06-003. The RUBA consists of two subaccounts:

- Uncollectible Cost Subaccount - The purpose of this subaccount is to record the difference between the authorized uncollectible revenues charged to residential customers and actual bad debt expense. This subaccount shall be effective on the date of D.20-06-003.
- In accordance with D.20-06-003, the RUBA will record the transfer of residential uncollectible expenses from the COVID-19 Customer Protections Memorandum Account (CPPMA) for the period March 4, 2020 through August 29, 2020 as authorized by the Commission.
- Arrearage Management Plan (AMP) Subaccount – The purpose of this subaccount is to record the debt forgiven under the AMP. This subaccount shall be effective upon approval of SoCalGas' Tier 2 Advice Letter, which is to be submitted within 90 days of D.20-06-003 to implement the AMP.

2. Applicability

This account shall apply to all gas customers except those specifically excluded by the Commission.

3. Rates

See Disposition Section.

4. Accounting Procedures – Uncollectible Cost Subaccount

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

- a. A debit/credit entry equal to the difference between uncollectible revenues charge to residential customers and actual bad debt expense;
- b. An entry to amortize the Uncollectible Cost Subaccount of the RUBA as authorized by the Commission;
- c. An entry to record the transfer of incremental residential expense from the CPPMA; and
- d. 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.

(Continued)

(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5817
 DECISION NO. 20-06-003

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 DATE FILED Jun 1, 2021
 EFFECTIVE Jul 1, 2021
 RESOLUTION NO. _____

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PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT
COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

Sheet 1

1. Purpose

The CPPMA is an interest-bearing memorandum account that is recorded on the Utility’s financial statements. Pursuant to Resolution M-4842, dated April 16, 2020, the purpose of the CPPMA is to record the incremental costs and waived charges incurred by SoCalGas associated with providing the emergency customer protection measures adopted in Decision 19-07-015 and otherwise offered in SoCalGas’ discretion. The applicable customer protections offered in response to Resolution M-4842 are described in SoCalGas’ Advice Letter 5604-B, submitted on May 22, 2020. Pursuant to Resolution M-4849, dated February 12, 2021, the applicable customer protections are extended to June 30, 2021.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to the COVID-19 Pandemic.

Pursuant to Resolution M-4842, the required emergency customer protection measures mandated by D.19-07-015 apply to all residential customers and non-residential core customers with an annual consumption of 10,000 therms of gas or less (eligible core customers). SoCalGas will also implement associated discretionary protections for all eligible core customers. Pursuant to Resolution M-4849, the required emergency customer protection measures are extended to June 30, 2021, unless further extended by the Commission. For those protections the Utility shall:

- a. Maintain customer protections effective March 4, 2020, through June 30, 2021, unless further extended by the Commission.
- b. Record costs in the CPPMA effective March 4, 2020.

Consistent with D.20-06-003, the CPPMA will no longer record incremental residential uncollectible costs effective August 30, 2020 as those costs will be recorded in the Residential Uncollectible Balancing Account (RUBA). In addition, the CPPMA will record the transfer of residential uncollectible expenses to the RUBA for the period March 4, 2020 through August 29, 2020 as authorized by the Commission.

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2. Applicability

The CPPMA shall apply to all customers except those specifically excluded by the Commission.

3. Rates

The CPPMA shall be applied to rates as described in Section 5 below.

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5817
 DECISION NO. 20-06-003

ISSUED BY
Dan Skopec
 Vice President
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
 SUBMITTED Jun 1, 2021
 EFFECTIVE Jul 1, 2021
 RESOLUTION NO. _____

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT
COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

Sheet 2

(Continued)

4. Accounting Procedures

SoCalGas shall maintain the CPPMA by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry equal to the actual operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return) associated with the COVID-19 consumer protections;
- b. A debit entry equal to waived charges;
- c. A debit entry for incremental uncollectible expense attributed to the COVID-19 pandemic consumer protections;
- d. A debit entry for other incremental costs related to implementing the COVID-19 pandemic customer protections;
- e. An entry to record the transfer of incremental residential uncollectible expense to the RUBA; and
- f. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the entries above at a rate equal to 1/12 of the interest rate on three-month nonfinancial Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

5. Disposition

Pursuant to Resolution M-4842, the disposition of the amounts in this account will be addressed through either a separate application or an existing annual proceeding with an expedited schedule (e.g., less than one year for approval).

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(TO BE INSERTED BY UTILITY)
 ADVICE LETTER NO. 5817
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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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PRELIMINARY STATEMENT (Continued)

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