PUBLIC UTILITIES COMMISSION
505 Van ness avenue
SAN FRANCISCO, CA 94102-3298

November 15, 2021
Advice Letter AL 5884-G, 5884-A, 5884-B
Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

## SUBJECT: Annual Regulatory Account Balance Update for Rates Effective January 1, 2022.

Dear Mr. van der Leeden:
Advice Letters 5884-G, 5884-A, 5884-B are effective as of January 1, 2022.
Sincerely,


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

October 15, 2021

Advice No. 5884
(U 904 G)
Public Utilities Commission of the State of California

## Subject: Annual Regulatory Account Balance Update for Rates Effective January 1, 2022

Southern California Gas Company (SoCaIGas) hereby submits for approval with the California Public Utilities Commission (Commission or CPUC) revisions to its revenue requirement and rates effective January 1, 2022.

## Purpose

This submittal, made each year on or before October $15^{\text {th }}$, updates SoCalGas' revenue requirement for projected year-end regulatory account balances as authorized in Decision (D.) 20-02-045, Decision Addressing San Diego Gas \& Electric Company and Southern California Gas Company' Triennial Cost Allocation Proceeding Application. This submittal revises SoCalGas' rates to incorporate the projected 2021 year-end regulatory account balances in transportation rates effective January 1, 2022. In compliance with D.11-04-032, this submittal also revises the Backbone Transportation Service (BTS) rate effective January 1, 2022.

Additionally, in compliance with D.16-10-004, this submittal revises SoCalGas' 2022 revenue requirement for Company-Use (CU) Fuel and Unaccounted For (UAF) Gas costs based on the updated Gas Price forecast as shown in Attachment C.

Furthermore, as required by D.15-10-032, Attachments H and I include the requested tables detailing information on, among other things, the forecasted revenue requirement for Greenhouse Gas (GHG) costs and the GHG allowance proceeds for inclusion in rates effective January 1, 2022.

SoCalGas also includes in this submittal updates to the revenue requirement for the 2016 Pipeline Safety Enhancement Plan (PSEP) Reasonableness Review authorized in D.19-02-004, 2017 PSEP Forecasted Revenue Requirement authorized in D.19-

03-025, and revenue requirement for the 2018 PSEP Reasonableness Review authorized in D.20-08-034. Refer to discussions below for further details.

## Background

The revenue requirement related to the regulatory account balances are amortized in rates over 12 months beginning each January $1^{\text {st }}$. It should be noted that the revenue requirement herein does not include other revenue requirement adjustments ${ }^{1}$ expected to be authorized by the Commission for implementation in transportation rates effective January 1, 2022. SoCalGas will submit an advice letter consolidating all Commission-authorized changes in its revenue requirement and the related changes to its rates at least three days prior to the January 1, 2022 effective date of such rates.

## Customer Rate Impact - Regulatory Account Balances

## Total

SoCalGas' transportation revenue requirement will decrease by $\$ 141.3$ million. The core and noncore customer revenue requirements will decrease by $\$ 135.1$ million and decrease by $\$ 6.2$ million, respectively, as a result of the regulatory account balance update.

Attachment A in this submittal shows the Natural Gas Transportation Rate Revenues table summarizing the change in the regulatory account balances and authorized CU Fuel and UAF Gas, the demand determinant for the BTS rate, the 2022 GHG revenue requirement, 2016 and 2018 PSEP Reasonableness Review revenue requirement for 2022, 2017 PSEP Forecasted Revenue Requirement for 2022, and corresponding present and proposed rates. Attachment B shows a Summary of Present and Proposed Regulatory Account Balances while Attachments D and E show the calculation of the Pension Balancing Account (PBA) and Post-Retirement Benefits Other than Pensions (PBOP) Balancing Account (PBOPBA) balances to be included in 2022 rates. Attachments $F$ and $G$ show the supporting calculations of the minimum contributions made to the Pension and PBOP Trusts for 2021.

## Core Customers

A $\$ 135.1$ million decrease in the core transportation revenue requirement reflects the amortization of the projected year-end 2021 regulatory account balances. The decrease is primarily due to a decrease in the undercollected balance of the General Rate Case Memorandum Account 2019 (GRCMA2019) and amortization of the net overcollected balance in Deployment Phase Cost and Post-Deployment Cost subaccounts of the Advanced Meter Infrastructure Balancing Account (AMIBA) partially offset by a change from a combined overcollected balance to a combined undercollected balance for the Company Facilities, End Users, and Lost \&

[^0]Unaccounted For (LUAF) GHG Compliance Cost subaccounts of the Greenhouse Gas Balancing Account (GHGBA) and amortization of the undercollected balance of the Dairy Biomethane Program Balancing Account (DBPBA) as described below.

GRCMA2019 - Pursuant to AL 5745, SoCalGas was authorized to amortize in 2021 rates a GRCMA2019 undercollection of $\$ 202.5$ million ( $\$ 179.1$ million in SoCalGas transportation rates, $\$ 22.8$ million in BTS rates and $\$ 0.6$ million allocated to SDG\&E). SoCalGas projects the GRCMA2019 to have a residual balance as of December 31, 2021. As a result, SoCalGas' transportation revenue requirement will decrease by $\$ 179.1$ million. The core revenue requirement allocation of this decrease is $\$ 163.6$ million.

AMIBA - As discussed below in a separate section, SoCalGas is proposing to amortize in 2022 rates a net overcollection of $\$ 77.8$ million in the two subaccounts of the AMIBA. The total overcollected balance is allocated to the core revenue requirement.

DBPBA - Pursuant to AL 5398 and AL 5398-A, SoCalGas established the DBPBA to record the dairy biomethane project costs associated with biogas collection lines and facilities for treatment, monitoring, metering, and compression of biogas before it enters the collection lines. The balance in the DBPBA up to the bid amount will be amortized in connection with this submittal in rates effective January 1 of the subsequent year. As a result, SoCalGas' transportation revenue requirement will increase by $\$ 45.5$ million. The core revenue requirement allocation of this increase is $\$ 42.2$ million.

GHGBA - Pursuant to AL 5745, SoCalGas was authorized to amortize in 2021 rates a combined overcollection in the GHGBA's Company Facilities, End Users, and LUAF GHG Compliance Cost subaccounts of $\$ 66.3$ million. The projected combined balance for these three subaccounts within the GHGBA for amortization in 2022 rates is $\$ 24.3$ million undercollected, representing a revenue requirement increase of $\$ 90.6$ million. The core revenue requirement allocation of this increase is $\$ 75.2$ million.

The major components of the core revenue requirement increase are as follows: ${ }^{2}$

[^1]| Description | Core Revenue <br> Requirement <br> Increase / (Decrease) <br> (in millions of \$) |
| :--- | ---: |
| GRCMA2019 | $(163.6)$ |
| AMIBA | $(77.8)$ |
| DBPBA | 42.2 |
| GHGBA | 75.2 |
| Other Regulatory Accounts - net | $(11.1)$ |
| Total Core Revenue Requirement | $(135.1)$ |

## Noncore Customers

A $\$ 6.2$ million decrease in the noncore transportation revenue requirement reflects the amortization of the projected year-end 2021 regulatory account balances. The reduction is primarily due to a decrease in the undercollected balances of the GRCMA2019 and Noncore Fixed Cost Account (NFCA) partially offset by changes from a combined overcollected balance to a combined undercollected balance for the three subaccounts of the GHGBA as described below.

GRCMA2019 - As discussed above, the transportation revenue requirement will decrease by $\$ 179.1$ million. The noncore revenue requirement allocation of this decrease is $\$ 15.5$ million.

NFCA - Pursuant to AL 5745, SoCalGas was authorized to amortize in 2021 rates a NFCA undercollection of $\$ 8.7$ million. The projected NFCA balance for amortization in 2022 rates is $\$ 3.1$ million undercollected, representing a revenue requirement decrease of $\$ 5.6$ million.

GHGBA - As discussed above, the transportation revenue requirement will increase by $\$ 90.6$ million. The noncore revenue requirement allocation of this increase is $\$ 15.4$ million.

The major components of the noncore revenue requirement increase are as follows: ${ }^{3}$

[^2]| Description | Noncore Revenue <br> Requirement <br> Increase / (Decrease) <br> (in millions of \$) |
| :--- | ---: |
| GRCMA2019 | $(15.5)$ |
| NFCA | $(5.6)$ |
| GHGBA | 15.4 |
| Other Regulatory Accounts - net | $(0.5)$ |
| Total Noncore Revenue Requirement | $(6.2)$ |

## Revision to the BTS Rate

Pursuant to AL 5712-A, SoCalGas was authorized to amortize in 2021 rates a Backbone Transmission Balancing Account (BTBA) overcollection of $\$ 37.2$ million. As of December 31, 2021, the BTBA is projected to have an overcollected balance of $\$ 37.2$ million, representing a minimal BTS revenue requirement increase.
Additionally, SoCalGas updated the BTS Demand pursuant to D.11-04-032. The calculation of the proposed BTS rate for 2022 is detailed below:

Update to BTS Rate

Unbundled BTS Revenues w/FFU (\$000's)
PSRMA-BBT SCG w/o FFU \$000
PSRMA-BBT SDG\&E w/o FFU $\$ 000$
SECCBA-BBT SCG w/o FFU \$000
SECCBA-BBT SDG\&E w/o FFU \$000
SEEBA-BBT SCG w/o FFU $\$ 000$
SEEBA-BBT SDG\&E w/o FFU \$000
SECCBA-BBT SCG - Phase 1b
SECCBA-BBT SDG\&E - Phase 1b
SEEBA-BBT SCG - Phase 1b
SEEBA-BBT SDG\&E - Phase 1b
SECCBA-BBT SCG - Phase 2
SECCBA-BBT SDG\&E - Phase 2
SEEBA-BBT SCG - Phase 2
SEEBA-BBT SDG\&E - Phase 2
TIMPBA-BBT SCG w/o FFU $\$ 000$
TIMPBA-BBT SDG\&E w/o FFU \$000
BTBA w/o FFU (\$000's)
FFU Rate
Balancing Accounts w/ FFU (\$000's)
SCG PSEP GRC
SCG PSEP GRCMA
BTS Revenue w/FFU (\$000's)
BTS Demand Dth/Day
BTS rate w/FFU \$/dth day

| Present | Proposed | increase (decrease) |
| :---: | :---: | :---: |
| $\$ 240,854$ | $\$ 240,854$ | $\$ 0$ |
| $\$ 380$ | $\$ 0$ | $(\$ 380)$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 20,615$ | $\$ 23,674$ | $\$ 3,059$ |
| $\$ 918$ | $\$ 918$ | $\$ 0$ |
| $\$ 5,642$ | $\$ 4,204$ | $(\$ 1,438)$ |
| $\$ 135$ | $\$ 135$ | $\$ 0$ |
| $\$ 563$ | $\$ 565$ | $\$ 2$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 1,045$ | $\$ 1,049$ | $\$ 4$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $\$ 0$ | $\$ 0$ | $\$ 0$ |
| $(\$ 37,244)$ | $(\$ 37,225)$ | $\$ 19$ |
| 1.0170 | 1.0170 | 0 |
| $\$ \$ 8,082)$ | $(\$ 6,794)$ | $\$ 1,288$ |
| $\$ 80,408$ | $\$ 80,408$ | $\$ 0$ |
| $\$ 22,844$ | $\$ 0$ | $(\$ 22,844)$ |
| $\$ 336,024$ | $\$ 314,468$ | $(\$ 21,556)$ |
|  |  | 17,851 |
| $2,514,457$ | $2,532,308$ |  |
| $\$ 0.36613$ | $\$ 0.34023$ | $(\$ 0.02590)$ |

## Revenue Requirement Change in CU Fuel and UAF Gas costs

Pursuant to D.20-02-045, the Commission authorized SoCalGas to update the underlying gas price used in determining the authorized costs for Other CU Fuel and UAF Gas. On an annual basis, SoCalGas updates the underlying gas price in the October submittal using a forecast of Southern California Citygate gas prices for the next year that is based on current futures prices.

As shown in Attachment C, SoCalGas forecasts the average gas price of $\$ 4.90 / \mathrm{MMBtu}$, an increase of $\$ 1.37 / \mathrm{MMBtu}$ from the $\$ 3.53 / \mathrm{MMB}$ u authorized for rates effective January 1, 2021. Based on this updated gas price forecast, SoCalGas proposes to revise its authorized costs for Other CU Fuel and UAF Gas to \$46.6 million, an increase of $\$ 13$ million compared to the present revenue requirement as shown in the calculation below:

Revenue Requirement Change for Gas Price Impact

|  | Present | Proposed | Increase |
| :---: | :---: | :---: | :---: |
| UnAccounted For Gas (UAF): |  |  |  |
| System Volumes Mth/yr | 9,350,960 | 9,350,960 |  |
| \% UAF (as \% of end use) | 0.937\% | 0.937\% |  |
| UAF Volumes Mth/yr | 87,664 | 87,664 |  |
| Gas Price \$/dth | \$3.53 | \$4.90 |  |
| UAF (M\$) | \$30,974 | \$42,926 | \$11,952 |
| Company Use Gas: Storage Load Balancing |  |  |  |
| Volumes Mth/yr | 3,534 | 3,534 |  |
| Gas Price \$/dth | \$3.53 | \$4.90 |  |
| Company Use Gas: Storage Load Balancing (M\$) | \$1,249 | \$1,731 | \$482 |
| Company Use Other: |  |  |  |
| Annual Average Volumes (Mth/year) | 4,037 | 4,037 |  |
| Gas Price \$/th | \$3.53 | \$4.90 |  |
| Co Use Other (M\$) | \$1,426 | \$1,977 | \$550 |
| Total CU Fuel, UAF Gas Costs | \$33,649 | \$46,633 | \$12,984 |

## GHG Revenue Requirement and Reporting Requirements

D.15-10-032 addresses the procedures necessary for natural gas corporations to comply with the California Cap on GHG Emissions and Market-Based Compliance Mechanisms (Cap-and-Trade Program), provides a set of tables and requirements for SoCalGas to use to annually forecast compliance costs and allowance proceeds, and requires SoCalGas to include those tables and reasonable supporting information regarding methodologies and assumptions in this submittal.

As required by D.15-10-032, Attachment H to this submittal includes four of the requested tables, including a brief description of tables $A$ and $C$. The Forecasted and Recorded data for 2020 and 2021 provided in the tables is for reference. Also, as required by D.15-10-032, Attachment I to this submittal includes Table B (Recorded GHG Costs) and SoCalGas' 2021 Compliance Instrument Procurement Limit. Per General Order (GO) 66-D, Section 583 of the Public Utilities Code, and D.17-09-023, Attachment I is provided confidentially to the Energy Division. The GHG revenue requirements and net allowance proceeds available for return are summarized in the table below.

|  | S millions |  |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Description | 2020 |  | 2021 |  | 2022 |  |  |
| GHG Revenue Requirement | Forecast $1 /$ | Recorded 1/ | Forecast 2/ | Recorded 3/ | Forecast | Recorded |  |
|  |  |  |  |  |  |  |  |

GHG Allowance Proceeds:

| Allowance Proceeds | (188.2) | $(168.7)$ | $(166.2)$ | (95.7) | (335.1) |
| :--- | :---: | ---: | ---: | ---: | ---: |
| Less: Outreach and Admin costs |  |  |  |  |  |
| Add: SB1477 Compliance costs | 24.6 | 36.9 | 24.6 | 12.3 | 24.6 |
| Net Allowance Proceeds | $(163.6)$ | $(131.8)$ | $(141.6)$ | $(83.4)$ | $(310.5)$ |
|  |  |  |  |  |  |

Notes
1/ 2020 Forecast GHG Revenue Requirement and Allowance Proceeds from AL 5530. 2020 Recorded data updated with actual for entire year.

2/ 2021 Forecast Revenue Requirement from AL 5712-A.
3/ 2021 Recorded GHG Revenue Requirement and Allowance Proceeds includes actual data for January through August.

SoCalGas is requesting to include the 2022 GHG revenue requirement in rates effective January 1, 2022. In addition, SoCalGas is requesting to refund the 2022 Allowance Proceeds in April 2022.

## 2016 PSEP Reasonableness Review

Pursuant to Ordering Paragraph (OP) 49 of D.19-02-004, SoCalGas is required to submit a Tier 2 AL to incorporate into rates future year revenue requirements associated with the capital expenditures approved in the decision. As this Annual Regulatory Account Balance Update for Rates is a Tier 2 submittal, SoCalGas incorporates its update of the 2022 revenue requirement associated with the PSEP capital projects approved in D.19-02-004 in this submittal.

Pursuant to AL 5745, SoCalGas was authorized to incorporate in 2021 rates a revenue requirement of $\$ 11.5$ million. The revenue requirement associated with PSEP capital expenditures approved in the decision for 2022 is $\$ 10.8$ million (without FF\&U), which represents a decrease in the revenue requirement of $\$ 0.7$ million (without FF\&U). SoCalGas will continue to update rates in subsequent years'
submittals for these ongoing capital-related revenue requirements until the actual capital costs for these PSEP projects are incorporated into base rates in connection with SoCalGas' next General Rate Case (GRC) proceeding

## 2017 PSEP Forecasted Revenue Requirement

Pursuant to OP 20 of D.19-03-025, SoCalGas is required to submit a Tier 2 advice letter to incorporate into rates future year revenue requirements associated with the forecasted capital expenditures approved in the decision until actual capital costs are incorporated into base rates in connection with SoCalGas' next GRC proceeding. As this Annual Regulatory Account Balance Update for Rates is a Tier 2 submittal, SoCalGas incorporates its update of the 2022 revenue requirement associated with forecasted capital expenditures approved in D.19-03-025 in this submittal.

Pursuant to AL 5745, SoCalGas was authorized to incorporate in 2021 rates a revenue requirement of $\$ 22$ million (without FF\&U). The forecasted revenue requirement associated with SoCalGas' twelve pipeline projects for 2022 is $\$ 26.5$ million (without FF\&U), which represents an increase in the revenue requirement of $\$ 4.5$ million (without FF\&U).

## 2018 PSEP Revenue Requirement

D.20-08-034, Decision Adopting Settlement Agreement Resolving the Application of Southern California Gas Company And San Diego Gas \& Electric Company For Review of Costs Incurred In Executing Pipeline Safety Enhancement Plan, adopted the Settlement Agreement approving the reasonableness of $\$ 934.6$ million of costs for PSEP projects in Application (A.) 18-11-010. Pursuant to OP 8 of D.20-08-034, SoCalGas submitted AL $5698^{4}$ incorporating in rates effective October 1, 2020 the revenue requirement based on fully loaded costs adjusted for ongoing capital-related costs through December 2020 associated with the PSEP project costs found reasonable by the decision. SoCalGas submitted AL $5870^{5}$ to remove this revenue requirement from rates effective October 1, 2021.

As discussed in D.20-08-034, future, ongoing capital-related costs incurred would be recovered on a concurrent basis from ratepayers over the remaining useful life of these PSEP [assets]. Pursuant to AL 5745, SoCalGas was authorized to incorporate in 2021 rates a revenue requirement of $\$ 78$ million. The revenue requirement associated with PSEP capital expenditures approved in the decision for 2022 is $\$ 75.9$ million (without FF\&U), which represents a decrease in the revenue requirement of $\$ 2.1$ million (without FF\&U). SoCalGas will continue to update rates in subsequent years' submittals for these ongoing capital-related revenue requirements until the actual capital costs for these PSEP projects are incorporated into base rates in connection with SoCalGas' next GRC proceeding.

[^3]
## AMIBA Amortization

Pursuant to D.10-04-027, SoCalGas submitted AL 4110 to establish the AMIBA to record the costs and corresponding revenue requirement associated with the Advanced Metering Infrastructure (AMI) Project. SoCalGas was authorized to deploy an AMI system by installing gas AMI meter modules and supporting communications network throughout its service territory. The total authorized cost for the AMI Project was $\$ 1,050.7$ million for a seven-year deployment period beginning in 2010.

In addition, D.10-04-027 approved the following sharing mechanism:

- To the extent actual program costs exceed the total cost of $\$ 1,050.7$ million by up to $\$ 100$ million, $50 \%$ of the costs that exceed $\$ 1,050.7$ million will be recovered in rates without any after-the-fact reasonableness review. The ratepayer portion of costs that exceed $\$ 1,050.7$ million will be recorded in and recovered through the AMIBA.
- To the extent actual program costs exceed the total cost of $\$ 1,050.7$ million by up to $\$ 100$ million, $50 \%$ of the costs that exceed $\$ 1,050.7$ million will be borne by SoCalGas' shareholders and will not be recovered in rates. The shareholder allocation of these costs will be removed from the AMIBA (i.e., reflected as a credit adjustment to the AMIBA for the revenue requirement associated with the cost overrun).
- To the extent actual program costs are below the total cost of $\$ 1,050.7$ million, then $10 \%$ of the difference between the $\$ 1,050.7$ million and the actual project cost will be awarded to SoCalGas' shareholders. This sharing mechanism will be applied to no more than the first $\$ 100$ million of expenditures that fall below the total cost of $\$ 1,050.7$ million. The shareholder allocation of the cost savings will be recorded as an adjustment to the AMIBA (i.e., reflected as a debit adjustment to the AMIBA for the revenue requirement associated with the cost underrun).
- Project costs that exceed $\$ 1,150.7$ million may be recoverable in rates to the extent approved by the Commission following a reasonableness review of the additional cost.

Pursuant to OP 8 of D.16-06-054, SoCalGas' Test-Year (TY) 2016 GRC, SoCalGas submitted AL 5134 to 1) extend the mechanism at least one year beyond the sevenyear deployment period (2010-2017) through 2018, or until the associated costs and benefits are incorporated in a separate GRC, and 2) establish three separate subaccounts as follows: Deployment Phase Cost Subaccount to continue to record costs consistent with the AMIBA originally submitted in AL 4110; Post-Deployment Phase Cost Subaccount to record the difference between actual operating \& maintenance (O\&M) costs/benefits and capital-related costs associated with AMI assets placed in service during the post-deployment phase of the AMI Project and the corresponding revenue requirement; and Escalated Jurisdiction Cost Subaccount to record meter reading costs associated with cities and counites where the AMI network has not been deployed. The balances in the Deployment Phase Cost Subaccount and Post-Deployment Phase Cost Subaccount will be amortized in rates in connection with SoCalGas' Annual Regulatory Account Balance Update submittal.

Pursuant to D.16-06-054, SoCalGas' TY 2019 GRC, AMI Project costs and benefits were included in the GRC, and as such, SoCalGas discontinued recording costs in the Deployment Phase Cost Subaccount and Post-Deployment Phase Cost Subaccount.

As shown in the table below, based on its review and analysis of costs for the AMI Project, SoCalGas actual project expenditures totaled $\$ 1,056$ million resulting in a cost overrun of $\$ 5.3$ million compared to the total authorized AMI Project Funding of $\$ 1,050.7$ million.

| Advanced Meter Infrastructure (AMI) Project Calculation of Ratepayer/Shareholder Mechanism |  |  |
| :---: | :---: | :---: |
|  | Amount (in \$ million) |  |
| Authorized AMI Project Funding | \$ | 1,050.7 |
| Actual Project Expenditures |  | 1,056.0 |
| Actual Project Expenditures above Authorized AMI Funding | \$ | 5.3 |
| Ratepayer portion (50\%) | \$ | 2.6 |
| Shareholder portion (50\%) | \$ | 2.6 |

In compliance with the approved sharing mechanism described above, to the extent actual program costs exceed the total cost of $\$ 1,050.7$ million by up to $\$ 100$ million, $50 \%$ of the costs that exceed $\$ 1,050.7$ million will be borne by SoCalGas' shareholders and will not be recovered in rates. As a result, SoCalGas will credit the AMIBA for $\$ 2.6$ million. SoCalGas proposes to amortize the net overcollected balance of $\$ 76.5$ million (without FF\&U) for the AMIBA in rates effective January 1, 2022 as shown in the table below.

Advanced Meter Infrastructure Balancing Account (AMIBA)
Amounts exclude FF\&U

|  | Amount (in \$ million) |  |
| :---: | :---: | :---: |
| Deployment Phase Cost Subaccount - projected overcollected balance as of December 31, 2021 add Shareholder allocation | \$ | $\begin{array}{r} (80.4) \\ (2.6) \end{array}$ |
| Total balance | \$ | (83.0) |
| Post-Deployment Phase Cost Subaccount - projected overcollected balance as of December 31, 2021 | \$ | 6.5 |
| Net overcollected balance | \$ | (76.5) |

## Protests

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 which is November 4, 2021. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: 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 AL via U.S. mail or fax. Please submit protests or comments to this AL via e-mail to the addresses 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
> 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 GO 96-B. This submittal is consistent with D.20-02-045. Therefore, SoCalGas respectfully requests that this submittal be approved on November 14, 2021, which is 30 calendar days from the date submitted, for implementation and inclusion in rates effective January 1, 2022.

## Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service lists in A.17-10-008, TY 2019 GRC and A.18-07-024, 2020 Triennial Cost Allocation Proceeding. 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<br>Joseph Mock<br>Director - Regulatory Affairs

Attachments

# California Public Utilities Commission 

ADVICE LETTER
SUMMARY

ENERGY UTILITY


## MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Gas Company (U 904G)

| Utility type: |  |  |
| :--- | :--- | :--- |
| $\square$ ELC | $\square$ GAS | $\square$ WATER | | Contact Person: Ray B. Ortiz |
| :--- |
| Phone \#: (213) 244-3837 |

Advice Letter (AL) \#: 5884
Tier Designation: 2
Subject of AL: Annual Regulatory Account Balance Update for Rates Effective January 1, 2022

Keywords (choose from CPUC listing): GRC, Balancing Account, Transporation Rates
AL Type: $\square$ Monthly $\square$ Quarterly $\square$ Annual $\square$ One-Time $\square$ Other:
If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution \#:
Decision (D.) 11-04-032, D.15-10-032, D.16-10-004, D.19-02-004, D.19-03-025, D.20-08-034, and D.20-02-045
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No
Summarize differences between the AL and the prior withdrawn or rejected AL: N/A
Confidential treatment requested? Yes $\square$ No

If yes, specification of confidential information: See Declaration of Confidentiality.
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: SoCalGas at Tariffs@socalgas.com
Resolution required? $\square$ Yes $\square$ No
Requested effective date: $1 / 1 / 22 \quad$ No. of tariff sheets: 0
Estimated system annual revenue effect (\%): 2.7\%
Estimated system average rate effect (\%): 2.7\%
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:
None

Service affected and changes proposedl': See Advice Letter
Pending advice letters that revise the same tariff sheets: None

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: Ray B. Ortiz
Title: Regulatory Tariff Manager
Utility Name: Southern California Gas Company
Address: 555 West Fifth Street, GT14D6
City: Los Angeles
State: California
Telephone (XXX) XXX-XXXX: (213) 244-3837
Facsimile (xxx) xxx-xxxx: (213) 244-4957
Email: ROrtiz@,socalgas.com

Name: SoCalGas Tariffs
Title:
Utility Name: Southern California Gas Company
Address: 555 West Fifth Street, GT14D6
City: Los Angeles
State: California
Telephone (XXX) XXX-XXXX: (213) 244-2837
Facsimile ( XXX ) XXX-XXXX: (213) 244-4957
Email: Tariffs@,socalgas.com

## ATTACHMENT A

Advice No. 5884

Natural Gas Transportation Rate Revenues
Southern California Gas Company
October Reg Account Update

## ATTACHMENT A

## Advice No. 5884

Natural Gas Transportation Rate Revenues
Southern California Gas Company
October Reg Account Update


1) These rates are for Natural Gas Transportation Service from "Citygate to Meter." The BTS rate is for service from Receipt Point to Citygate.
2) All rates include Franchise Fees \& Uncollectible charges.

## ATTACHMENT B

Advice No. 5884

SoCalGas Present and Proposed Regulatory Account Balances (M\$)

SOUTHERN CALIFORNIA GAS COMPANY
SOCALGAS PRESENT AND PROPOSED REGULATORY ACCOUNT BALANCES (M\$)

| Account Name |  | Authorized 10/01/2021 Amorrization |  |  | Proposed 01/01/2022 Amortization |  |  | Proposed Change |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Core | Noncore | Total System | Core | Noncore | Total System | Core | Noncore | Total System |
|  | (1) | ${ }^{(2)}$ | (3) | (4) | (5) | ${ }^{(6)}$ | (7) | (8) | ${ }^{(9)}$ | (10) |
| REGULATORY ACCOUNTS |  |  |  |  |  |  |  |  |  |  |
| 1. | Advanced Meter Infrastructure Balancing Account (AMIBA) | \$0 | \$0 | \$0 | (\$77,775) | \$0 | (\$77,775) | (\$77,775) | \$0 | (\$77,775) |
|  | Affiliate Transfer Fee Account (ATFA) | (\$356) | (\$28) | (\$384) | (\$53) | (\$4) | (\$57) | \$304 | \$24 | \$327 |
| 3. | Biogas Conditioning/Upgrading Services Balancing Account (BCSBA) | \$0 | \$0 | \$0 | (\$45) | (\$4) | (\$49) | (\$45) | (\$4) | (\$49) |
| 4. | Biomethane Cost Incentive Pgm Balancing Acct (BCIPBA) | \$3,160 | \$4,995 | \$8,155 | \$3,942 | \$6,232 | \$10,174 | \$782 | \$1,237 | \$2,019 |
| 5. | California Solar Iniative Thermal Memorandum Account (CSITPMA) | \$3,895 | \$2,084 | \$5,979 | \$920 | \$492 | \$1,412 | (\$2,976) | (\$1,592) | (\$4,568) |
|  | Company-Use Fuel for Load Balancing Account (CUFLBA) | (\$282) | (\$463) | (\$745) | (\$443) | (\$726) | $(\$ 1,169)$ | (\$161) | (\$263) | (\$424) |
| 7. | Compression Services Balancing Account (CSBA) | (\$71) | \$0 | (\$71) | (\$68) | \$0 | (\$68) | \$3 | \$0 | \$3 |
| 8. | Compressor Station Fuel and Power Balancing Account (CFPBA) | (\$1,024) | $(\$ 1,207)$ | $(\$ 2,231)$ | (\$653) | (\$770) | (\$1,423) | \$371 | \$437 | \$808 |
|  | Core Fixed Cost Account - Non NGV (CFCA) | \$5,195 | \$0 | \$5,195 | (\$28,140) | \$0 | (\$28,140) | (\$34,913) | \$0 | (\$34,913) |
| 10. | Core Fixed Cost Account - NGV (CFCA) | \$6,772 | \$0 | \$6,772 | \$9,829 | \$0 | \$9,829 | \$4,634 | \$0 | \$4,634 |
| 11. | Core Fixed Cost Account - C\&l Shortfall (CFCA) | \$21,063 | \$0 | \$21,063 | \$28,772 | \$0 | \$28,772 | \$7,709 | \$0 | \$7,709 |
| 12. | Distributed Energy Resources Svcs Bal Account (DERSBA) | (\$126) | (\$10) | (\$136) | \$0 | \$0 | \$0 | \$126 | \$10 | \$136 |
| 13. | Diary Biomethane Program Balancing Account (DBPBA) | \$0 | \$0 | \$0 | \$42,181 | \$3,287 | \$45,467 | \$42,181 | \$3,287 | \$45,467 |
| 14. | Economic Practicality Shortfall Memorandum Account (EPSMA) | \$0 | \$497 | \$497 | \$0 | \$396 | \$396 | \$0 | (\$101) | (\$101) |
| 15. | Enhanced Oil Recovery Account (EORA) | (\$3,061) | (\$239) | (\$3,299) | \$2,348 | \$183 | \$2,531 | \$5,409 | \$421 | \$5,831 |
| 16. | General Rate Case Revenue Requirement Memorandum Account (GRCMA) | \$155,552 | \$12,127 | \$167,678 | \$0 | \$0 | \$0 | (\$155,552) | (\$12,127) | (\$167,678) |
| 17. | GRCMA PSEP Distribution | \$5,347 | \$1,229 | \$6,576 | \$0 | \$0 | \$0 | (\$5,347) | $(\$ 1,229)$ | $(\$ 6,576)$ |
| 18. | GRCMA PSEP Local Transmission | \$2,571 | \$2,029 | \$4,600 | \$0 | \$0 | \$0 | (\$2,571) | $(\$ 2,029)$ | (\$4,600) |
| 19. | GRCMA Sub allocation for AB32 Admin Fees | \$142 | \$101 | \$244 | \$0 | \$0 | \$0 | (\$142) | (\$101) | (\$244) |
| 20. | Green House Gas Balancing Account (GHGBA) - Company Gas Compressor | (\$847) | (\$1,338) | (\$2,185) | \$43 | \$67 | \$110 | \$889 | \$1,406 | \$2,295 |
| 21. | Green House Gas Balancing Account (GHGBA) - End User | $(\$ 46,939)$ | $(\$ 7,797)$ | (\$54,735) | \$20,657 | \$3,431 | \$24,088 | \$67,595 | \$11,228 | \$78,823 |
| 22. | Green House Gas Balancing Account (GHGBA) - LUAF | (\$6,682) | (\$2,712) | (\$9,394) | \$68 | \$28 | \$96 | \$6,750 | \$2,740 | \$9,490 |
| 23. | Hazardous Substance Cost-Recovery Account (HSCRA) | \$1,085 | \$1,715 | \$2,801 | \$110 | \$174 | \$284 | (\$975) | $(\$ 1,541)$ | (\$2,516) |
| 24. | Integrated Transmission Balancing Account (ITBA) Margin | \$3,732 | \$4,399 | \$8,131 | \$81 | \$95 | \$176 | $(\$ 3,552)$ | (\$4,304) | (\$7,955) |
| 25. | Intervenor Award Memorandum Account (IAMA) | \$532 | \$841 | \$1,372 | \$284 | \$448 | \$732 | (\$248) | (\$392) | (\$640) |
| 26. | Liability Insurance Premium Balancing Account (LIPBA) | \$5,976 | \$466 | \$6,441 | \$13,282 | \$1,035 | \$14,317 | \$7,306 | \$569 | \$7,876 |
| 27. | Master Meter Balancing Account (MMBA) | \$16,608 | \$1,294 | \$17,902 | \$16,209 | \$1,263 | \$17,472 | (\$399) | (\$31) | (\$430) |
| 28. | New Environmental Regulation Balancing Account (NERBA) - Admin Fees Subaccount | \$2,245 | \$1,592 | \$3,838 | \$2,087 | \$1,480 | \$3,568 | (\$158) | (\$112) | (\$270) |
| 29. | New Environmental Regulatory Balancing Account (NERBA) - Leak Detection \& Repair (LDAR) sub-i | \$0 | \$0 | \$0 | \$1,837 | \$143 | \$1,980 | \$1,837 | \$143 | \$1,980 |
| 30. | New Environmental Regulatory Balancing Account (NERBA) - Natural Gas Leak Abatment Prgm sub. | \$0 | \$0 | \$0 | (\$1,993) | (\$155) | (\$2,148) | (\$1,993) | (\$155) | (\$2,148) |
| 31. | Noncore Fixed Cost Account (NFCA) Margin | \$0 | \$9,381 | \$9,381 | \$0 | \$6,371 | \$6,371 | \$0 | (\$3,009) | (\$3,009) |
| 32. | Noncore Fixed Cost Account (NFCA) Nonmargin | \$0 | (\$695) | (\$695) | \$0 | (\$3,276) | (\$3,276) | \$0 | $(\$ 2,580)$ | $(\$ 2,580)$ |
| 33. | Noncore Storage Balancing Account (NSBA) | \$2,563 | \$4,051 | \$6,613 | \$47 | \$75 | \$122 | (\$2,515) | (\$3,976) | $(\$ 6,491)$ |
| 34. | PBOP Balancing Account (PBOPBA) | (\$1,945) | (\$152) | $(\$ 2,097)$ | $(\$ 4,016)$ | (\$313) | (\$4,329) | (\$2,071) | (\$161) | $(\$ 2,233)$ |
| 35. | Pension Balancing Account (PBA) | \$8,215 | \$640 | \$8,855 | \$10,497 | \$818 | \$11,315 | \$2,282 | \$178 | \$2,460 |
| 36. | Pipeline Safety and Reliability Memo Acct (PSRMA) - Distribution | \$123 | \$28 | \$151 | \$0 | \$0 | \$0 | (\$123) | (\$28) | (\$151) |
| 37. | Pipeline Safety and Reliability Memo Acct (PSRMA) - Local Transmission | \$112 | \$88 | \$200 | \$0 | \$0 | \$0 | (\$112) | (\$88) | (\$200) |
| 38. | Residential Uncollectible Balancing Account (RUBA) | \$0 | \$0 | \$0 | \$2,716 | \$4,294 | \$7,010 | \$2,716 | \$4,294 | \$7,010 |
| 39. | Research Royalty Memorandum Account (RRMA) | (\$92) | (\$7) | (\$100) | (\$149) | (\$12) | (\$161) | (\$57) | (\$4) | (\$61) |
| 40. | Rewards \& Penalties Balancing Account (RPBA) | (\$291) | (\$23) | (\$315) | (\$248) | (\$19) | (\$267) | \$44 | \$3 | \$48 |
| 41. | Safety Enhancement Capital Cost Balancing Account (SECCBA) - Distribution | \$53,599 | \$12,302 | \$65,901 | \$58,997 | \$13,541 | \$72,538 | \$5,398 | \$1,239 | \$6,637 |
| 42. | Safety Enhancement Capital Cost Balancing Account (SECCBA) - Local Transmission | \$12,089 | \$9,529 | \$21,617 | \$12,794 | \$10,085 | \$22,879 | \$706 | \$556 | \$1,262 |
| 43. | Safety Enhancement Expense Balancing Account (SEEBA) - Distribution | \$1,655 | \$380 | \$2,035 | \$1,311 | \$301 | \$1,612 | (\$344) | (\$79) | (\$423) |
| 44. | Safety Enhancement Expense Balancing Account (SEEBA) - Local Transmission | \$312 | \$246 | \$558 | \$320 | \$252 | \$572 | \$8 | \$6 | \$14 |
| 45. | Self-Generation Program Memorandum Account (SGPMA) | \$6,894 | \$9,378 | \$16,272 | \$6,894 | \$9,378 | \$16,272 | \$0 | \$0 | \$0 |
| 46. | System Operator Gas Account (SOGA) | (\$82) | (\$130) | (\$213) | (\$22) | (\$35) | (\$57) | \$60 | \$95 | \$155 |
| 47. | System Reliability Memorandum Account (SRMA) | \$105 | \$166 | \$271 | \$0 | \$0 | \$0 | (\$105) | (\$166) | (\$271) |
|  | Total Regulatory Accounts | \$257,743 | \$64,757 | \$322,501 | \$122,621 | \$58,556 | \$181,177 | (\$135,123) | ( 56,201 ) | (\$141,324) |

Note $1 /$ All amounts include FF\&U.
Note 2 / Forecasted SoCalGas ITBA December 31, 2021 balance is on a combined and re-allocated basis.

## ATTACHMENT C

Advice No. 5884

## Southern California Gas Company

Gas Price Forecast - 2022

## ATTACHMENT C

Advice No. 5884

## SOUTHERN CALIFORNIA GAS COMPANY GAS PRICE FORECAST - 2022

| Jan | $\$ 6.18$ |
| :---: | ---: |
| Feb | $\$ 5.86$ |
| Mar | $\$ 4.47$ |
| Apr | $\$ 3.56$ |
| May | $\$ 3.39$ |
| June | $\$ 3.67$ |
| July | $\$ 4.59$ |
| Aug | $\$ 4.61$ |
| Sept | $\$ 4.47$ |
| Oct | $\$ 3.83$ |
| Nov | $\$ 4.17$ |
| Dec | $\$ 4.70$ |


| Total (average) |
| :--- |

Note 1 / the projected gas price of $\$ 4.46 / D$ th is increased by the projected backbone transmission rate and brokerage fee to project the Citygate gas price of \$4.90/Dth.

## ATTACHMENT D

Advice No. 5884

Southern California Gas Company
Pension Balancing Account (PBA)

## ATTACHMENT D

Advice No. 5884
SOUTHERN CALIFORNIA GAS COMPANY

## PENSION BALANCING ACCOUNT (PBA)

## Year 2021

(Over) / Under Collection M\$

Beginning Balance
Prior Period Adjustment

## Adjusted Beginning Balance

| Jan | Feb | Mar | Apr | M |
| :--- | :--- | :--- | :--- | :--- |
| actl | actl | actl | actl | act |

Recorded Cost
May

Authorized Cost
Net position (2-3)

| Amortization | 726 | 726 | 726 | 726 | 726 | 726 | 726 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Current Month Adjustment (4-5): | $(12,208)$ | $(12,188)$ | $(12,167)$ | 25,470 | $(12,295)$ | $(12,273)$ | 25,365 |
| Current Month Interest**: | 0 | (1) | (1) | (1) | (1) | (1) | (1) |
| Total Current Month Activity (6+7): | $(12,208)$ | $(12,188)$ | $(12,169)$ | 25,469 | $(12,295)$ | $(12,274)$ | 25,364 |
| Ending Balance (1b+8): | $(2,797)$ | $(14,985)$ | $(27,154)$ | $(1,685)$ | $(16,250)$ | $(28,524)$ | $(3,160)$ |
| ** Interest applied to average monthly balance as follows: ((Beg. Bal.+(Beg. Bal.+Current Month Adjustment))/2)*(Int.Rate/12) |  |  |  |  |  |  |  |
| Interest Assumption: | 0.13\% | 0.10\% | 0.08\% | 0.08\% | 0.06\% | 0.05\% | 0.05\% |
| Supporting Calculation-2021 Net Pension Revenue/Costs |  |  |  |  | Authorized |  | Recorded |
|  |  |  |  |  | Cost |  | Cost |
| Gross Revenue/costs |  |  |  |  | 158,184 |  | 150,469 |
| Less: Amount capitalized |  |  |  |  | $(44,134)$ |  | $(27,197)$ |
| Less: Billings to SDG\&E/Unregulated | filiates |  |  |  | $(1,622)$ |  | $(2,300)$ |
| Plus: Billings from SDG\&E |  |  |  |  | 0 |  | 1,000 |
| Depreciation/Return 1/ |  |  |  |  | 2,768 |  | 5,928 |
| Net Costs |  |  |  |  | \$115,196 |  | \$127,900 |

1/ Reflects the depreciation and return differential associated with authorized/actual capitalization.

## ATTACHMENT E

Advice No. 5884

## Southern California Gas Company

 Post-Retirement Benefits Other than Pensions Balancing Account (PBOPBA)
## ATTACHMENT E

Advice No. 5884

SOUTHERN CALIFORNIA GAS COMPANY
POST RETIREMENT BENEFITS OTHER THAN PENSION BALANCING ACCOUNT (PBOPBA)
Year 2021
(Over) / Under Collection M\$

| Line |  | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | actl | actl | actl | actl | actl | actl | actl | actl | fcst | fcst | fcst | fcst |  |
| 1 | Beginning Balance | $(2,095)$ | $(2,246)$ | $(2,394)$ | $(2,538)$ | $(2,679)$ | $(3,201)$ | $(3,363)$ | $(3,521)$ | $(3,675)$ | $(3,826)$ | $(3,973)$ | $(4,117)$ | $(2,095)$ |
| 1 a | Prior Period Adjustment |  |  |  |  | (357) |  |  |  |  |  |  |  | (357) |
| 1b | Adjusted Beginning Balance | $(2,095)$ | $(2,246)$ | $(2,394)$ | $(2,538)$ | $(3,036)$ | $(3,201)$ | $(3,363)$ | $(3,521)$ | $(3,675)$ | $(3,826)$ | $(3,973)$ | $(4,117)$ | $(2,452)$ |
| 2 | Recorded Cost | (317) | (314) | (310) | (307) | (331) | (327) | (324) | (320) | (317) | (313) | (309) | (306) | $(3,795)$ |
| 3 | Authorized Cost | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 69 |
| 4 | Net position (2-3): | (323) | (319) | (316) | (313) | (337) | (333) | (330) | (326) | (323) | (318) | (315) | (311) | $(3,864)$ |
| 5 | Amortization | (172) | (172) | (172) | (172) | (172) | (172) | (172) | (172) | (172) | (172) | (172) | (172) | $(2,062)$ |
| 6 | Current Month Adjustment (4-5): | (151) | (148) | (144) | (141) | (165) | (161) | (158) | (154) | (151) | (147) | (143) | (140) | $(5,926)$ |
| 7 | Current Month Interest**: | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (0) | (1) | (1) | (1) | (3) |
| 8 | Total Current Month Activity (6+7): | (151) | (148) | (144) | (141) | (165) | (162) | (158) | (154) | (151) | (147) | (144) | (140) | $(1,805)$ |
| 9 | Ending Balance (1b+8): | $(2,246)$ | $(2,394)$ | $(2,538)$ | $(2,679)$ | $(3,201)$ | $(3,363)$ | $(3,521)$ | $(3,675)$ | $(3,826)$ | $(3,973)$ | $(4,117)$ | $(4,257)$ | $(4,257)$ |
| ** Interest applied to average monthly balance as follows: ((Beg. Bal.+(Beg. Bal.+Current Month Adjustment))/2)*(Int.Rate/12) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Interest Assumption: | 0.13\% | 0.10\% | 0.08\% | 0.08\% | 0.06\% | 0.05\% | 0.05\% | 0.06\% | 0.09\% | 0.16\% | 0.16\% | 0.16\% |  |
| Supporting Calculation - 2021 Net PBOP Revenue/Costs |  |  |  |  |  | Authorized Cost | Recorded <br> Cost |  |  |  |  |  |  |  |
|  | Gross Revenue/costs |  |  |  |  | 0 | 0 |  |  |  |  |  |  |  |
|  | Lees: Amount capitalized |  |  |  |  | 0 | $(4,546)$ |  |  |  |  |  |  |  |
|  | Less: Billings to SDG\&E/Unregulated | liates |  |  |  | 0 | (384) |  |  |  |  |  |  |  |
|  | Plus: Billings from SDG\&E |  |  |  |  | 63 | 160 |  |  |  |  |  |  |  |
|  | Depreciation/Return 1/ |  |  |  |  | 6 | 975 |  |  |  |  |  |  |  |
|  | Net Costs |  |  |  |  | \$69 | $(\$ 3,795)$ |  |  |  |  |  |  |  |

1/ Reflects the depreciation and return differential associated with authorized/actual capitalization.

## ATTACHMENT F

 Advice No. 5884Southern California Gas Company
Pension Plan
Based on 2021 Draft Actuarial Results
Development of 2021 Minimum Required Contribution

## ATTACHMENT F

## Advice No. 5884

## Southern California Gas Company Pension Plan

## Development of Pension Plan Contribution

## Based on 2021 Draft Actuarial Results

## I. Base Policy Amount

## II. Development of $\mathbf{2 0 2 1}$ Minimum Required Contribution

1. 2021 Funding Target liability
[ Net Effective Interest Rate ]
\$1,637,291,269
2021 Plan Actuarial Value of Assets
\$1,796,003,253
2. Funding shortfall [MAX [(II.1) - (II.2),0]]
3. Excess assets [MAX [(II.2) - (II.1),0]]
4. 2021 Plan Normal Cost
[includes estimated plan expenses of $\$ 9,900,000$ ]
5. Funding shortfall base *
(a) 2021 funding shortfall base
[ ( II. 3 )]
\$158,711,984
\$68,776,592
\$0
6. 2021 Amortization factor
[based on amortization of shortfall over 15 years, assuming
at $4.75 \%$ rate for the first 5 years and $5.36 \%$ rate for the final 10 years]
7. 2021 funding shortfall to be amortized in 2021-2035 [ II.6(a) x II.7]
8. 2021 Minimum required contribution
[ If II. $4>0$, then Max (0, II. 5 - II.4), otherwise (II. 5 + II.8), amount as of 1/1/2021]
9. Adjusted to end of year [ $11.9 \times(1+$ effective interest rate $)$ ]
III. Development of Contribution to maintain AVA at 85\% of Funding Target
10. 2021 Funding Target liability
\$1,637,291,269
11. $85 \%$ of 2021 Funding Target liability [ III. $1 \times 85 \%$ ]
\$1,391,697,579
12. 2021 Plan Actuarial Value of Assets
\$1,796,003,253
13. Contribution to maintain AVA at $85 \%$ of Funding Target [ MAX[ (III.3) - (III.2), 0] ]
14. Adjusted to end of year [ III. $4 \times(1+$ effective interest rate) ]

## IV. 110\% of Projected Benefit Obligation Cap

1. $110 \%$ of Projected Benefit Obligation at $12 / 31 / 2021 \quad \$ 3,002,582,581$
2. Fair Value of Assets as 12/31/2021
\$2,049,694,300
3. Maximum Contribution (end of year) [IV.1-IV.2]
\$952,888,281
V. Final 2021 Contribution (Greater of I, II, or III, but no more than IV)
\$150,465,000
2021 Contributions (Reflecting quarterly timing requirement)
Funding
First quarterly contribution deposited on April 1, 2021
Second quarterly contribution deposited on July 1, 2021
Third quarterly contribution deposited on September 15, 2021
Final 2021 contribution estimated to be deposited on December 15, 2021
Sum of payments made for the 2021 Plan Year
\$37,617,000
\$37,617,000
\$37,617,000
\$37,614,000
\$150,465,000
[^4]
## ATTACHMENT G

Advice No. 5884

Southern California Gas Company
Represented and Non-Represented Retiree Health and Welfare Programs
Development of 2021 Contribution Based on 2021 Draft Actuarial Reports

## Southern California Gas Company <br> Represented and Non-Represented Retiree Health and Welfare Programs Development of 2021 Contribution Based on 2021 Draft Actuarial Reports

1. 2021 APBO
2. Discount rate
3. 2021 Fair Value of Assets
\$741,439,245
4. 2021 Plan Service Cost
\$1,168,689,192
5. Interest cost
6. Expected return on assets
7. Prior service cost amortization
8. Unrecognized (gain)/loss amortization
9. Special Termination Benefits
10. Net periodic benefit cost/(income)
11. IRS maximum deductible trust contributions\$0
12. Expected Benefits paid directly by the Company ..... 920,000
13. Total IRS maximum deductible contribution

ATTACHMENT H
Advice No. 5884

Table A: Forecast Revenue Requirement
Table A: Write Up
Table C: GHG Allowance Proceeds
Table C: Write Up
Table D: GHG Outreach and Administrative Expenses
Table E: Compliance Obligation Over Time

Table A: Forecast Revenue Requirement

| Line | Description | 2020 |  |  |  | 2021 |  |  | 2022 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Forecast | Rec | corded |  | Forecast 1/ | Recorded 2/ |  | Forecast | Recorded |
| 1 | Gross Throughput (MMcf) |  | 780,808 |  |  |  | 752,680 |  |  | 756,758 |  |
| 2 | Throughput to Covered Entities (MMcf) |  | $(388,733)$ |  |  |  | $(353,076)$ |  |  | $(363,737)$ |  |
| 3 | Net Throughput to End Users (MMcf) (Line $1+$ Line 2) |  | 392,076 |  |  |  | 399,604 |  |  | 393,021 |  |
| 4 | Lost and Unaccounted for Gas (MMcf) |  | 6,606 |  |  |  | 7,053 |  |  | 7,091 |  |
| 5 | Total Supplied Gas (MMcf) (Line $3+$ Line 4) |  | 398,681 |  |  |  | 406,656 |  |  | 400,112 |  |
| 6 | Emissions Conversion Factor ( $\mathrm{MTCO}_{2} \mathrm{e} / \mathrm{MMcf}$ ) |  | 54.64 |  |  |  | 54.64 |  |  | 54.64 |  |
| 7 | Compliance Obligation for End Users and LUAF ( $\mathrm{MTCO}_{2} \mathrm{e}$ ) (Line 5 * Line 6) |  | 21,785,687 |  |  |  | 22,221,479 |  |  | 21,863,875 |  |
| 8 | Compliance Obligation for Company Facilities ( $\mathrm{MTCO}_{2} \mathrm{e}$ ) |  | 110,000 |  |  |  | 90,000 |  |  | 90,000 |  |
| 9 | Gross Compliance Obligation ( $\mathbf{M T C O}_{2} \mathbf{e}$ ) (Line $7+$ Line 8) |  | 21,895,687 |  |  |  | 22,311,479 |  |  | 21,953,875 |  |
| 10 | Directly Allocated Allowances |  | $(19,822,267)$ |  |  |  | $(19,030,307)$ |  |  | $(18,238,349)$ |  |
| 11 | Percentage Consigned to Auction |  | 50\% |  |  |  | 55\% |  |  | 60\% |  |
| 12 | Consigned Allowances (Line 10 * Line 11) |  | 9,911,133 |  |  |  | 10,466,669 |  |  | 10,943,009 |  |
| 13 | Net Compliance Obligation ( $\mathbf{M T C O}_{2} \mathbf{e}$ ) $($ Line $9+$ Line 10+ Line 12) |  | 11,984,553 |  |  |  | 13,747,841 |  |  | 14,658,535 |  |
| 14 | Proxy GHG Allowance Price | \$ | 18.16 |  |  | \$ | 17.91 |  | \$ | 29.26 |  |
| 15a | Compliance Instrument Cost | \$ | 217,615,521 | \$ | 183,987,535 | \$ | 246,196,341 | \$ 117,235,154 | \$ | 428,938,043 |  |
| 15b | Compliance Instrument Cost (2018 Amortization) 3/ | \$ | 105,158,106 |  |  | \$ | - |  | \$ | - |  |
| 16 | Interest |  |  | \$ | $(137,324)$ |  |  | \$ $(52,411)$ |  |  |  |
| 17 | Franchise Fees \& Uncollectibles | \$ | 5,606,725 |  |  | \$ | 4,208,480 |  | \$ | 7,077,478 |  |
| 18 | Revenue Requirement (Line $15+$ Line $16+$ Line 17) | \$ | 328,380,352 | \$ | 183,850,211 | \$ | 250,404,821 | \$ 117,182,743 | \$ | 436,015,521 |  |
| 19 | Previous Year's Cost Balancing Subaccount Balance w/ FFU | \$ | $(51,772,715)$ |  |  | \$ | $(66,326,884)$ |  | \$ | 24,282,795 |  |
| 20 | Revenue Requirement to be Included in Rates (Line $18+$ Line 19) | \$ | 276,607,638 | \$ | 183,850,211 | \$ | 184,077,937 | \$ 117,182,743 | \$ | 460,298,316 |  |
| 21 | Covered Entity Rate Impact (\$/therm) | \$ | 0.00104 |  |  | \$ | (0.00032) |  | \$ | 0.00158 |  |
| 22 | Non-Covered Entity Rate Impact (\$/therm) | \$ | 0.03999 |  |  | \$ | 0.04497 |  | \$ | 0.11066 |  |


| Supporting Information: |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FF\&U \% |  | 1.737\% |  | 1.709\% |  | 1.650\% |
| LUAF \% |  | 0.846\% |  | 0.937\% |  | 0.937\% |
| System Throughput |  | 9,417,004 |  | 9,142,019 |  | 9,142,019 |
| Non-Covered Entity Throughput |  | 4,103,500 |  | 4,128,641 |  | 4,087,740 |
| Revenue Requirement to be Included in Rates w/FFU |  |  |  |  |  |  |
| End-User Revenue Requirement w/FFU | \$ | 212,695,346 | \$ | 241,746,095 | \$ | 421,813,149 |
| LUAF Revenue Requirement w/FFU | \$ | 6,668,181 | \$ | 7,019,455 | \$ | 11,525,338 |
| Company Facilities Revenue Requirement w/FFU | \$ | 2,032,075 | \$ | 1,639,271 | \$ | 2,677,034 |
| End-User Revenue Requirement w/FFU (2018 Amortization) | \$ | 101,264,004 | \$ | - | \$ | - |
| LUAF Revenue Requirement w/FFU (2018 Amortization) | \$ | 3,710,380 | \$ | - | \$ | - |
| Company Facilities Revenue Requirement w/FFU (2018 Amortization) | \$ | 2,010,366 | \$ | - | \$ | - |
| Total Revenue Requirement w/FFU | \$ | 328,380,352 | \$ | 250,404,821 | \$ | 436,015,521 |
| Cost Balancing Account Balances w/FFU |  |  |  |  |  |  |
| End-User w/ FFU | \$ | $(52,893,690)$ | \$ | $(54,741,918)$ | \$ | 24,076,490 |
| LUAF w/ FFU | \$ | 2,200,938 | \$ | $(9,398,484)$ | \$ | 96,175 |
| Company Facilities w/ FFU | \$ | $(1,079,962)$ | \$ | $(2,186,482)$ | \$ | 110,131 |
| Total Balancing Accounts w/FFU | \$ | (51,772,715) | \$ | $(66,326,884)$ | \$ | 24,282,795 |
| Total GHG Costs in Rates w/ FFU | \$ | 276,607,638 | \$ | 184,077,937 | \$ | 460,298,316 |
| Revenue Requirement to be Included in Rates w/out FFU |  |  |  |  |  |  |
| End-User Revenue Requirement w/out FFU | \$ | 209,063,812 | \$ | 237,683,140 | \$ | 414,966,206 |
| LUAF Revenue Requirement w/out FFU | \$ | 6,554,330 | \$ | 6,901,481 | \$ | 11,338,256 |
| Company Facilities Revenue Requirement w/out FFU | \$ | 1,997,380 | \$ | 1,611,720 | \$ | 2,633,580 |
| End-User Revenue Requirement w/o FFU (2018 Amortization) | \$ | 99,535,035 | \$ | - | \$ | - |
| LUAF Revenue Requirement w/o FFU (2018 Amortization) | \$ | 3,647,030 | \$ | - | \$ | - |
| Company Facilities Revenue Requirement w/o FFU (2018 Amortization) | \$ | 1,976,041 | \$ | - | \$ | - |
| Total Revenue Requirement w/out FFU | \$ | 322,773,627 | \$ | 246,196,341 | \$ | 428,938,043 |
| Cost Balancing Account Balances w/o FFU |  |  |  |  |  |  |
| End-User w/o FFU | \$ | (51,990,590) | \$ | $(53,821,886)$ | \$ | 23,685,676 |
| LUAF w/o FFU | \$ | 2,163,359 | \$ | $(9,240,526)$ | \$ | 94,614 |
| Company Facilities w/o FFU | \$ | $(1,061,523)$ | \$ | $(2,149,734)$ | \$ | 108,343 |
| Total Balancing Accounts w/o FFU | \$ | (50,888,754) | \$ | $(65,212,147)$ | \$ | 23,888,633 |
| $\underline{\text { Total GHG Costs in Rates w/out FFU }}$ | \$ | 271,884,873 | \$ | 180,984,194 | \$ | 452,826,676 |

Note 1/ 2021 Forecasted Revenue Requirement from AL 5712-A.
Note 2/ 2021 Recorded Compliance Instrument Costs include actual expenses for January through August.
Note 3/Pursuant to D.18-03-017 and Advice No. 5426, 2018 revenue requirement was amortized over 18-month period, from April 1, 2019 to September 30, 2020.
Therefore, the amount is excluded from the Forecast 2022 Revenue Requirement.

## Attachment H-Table A

SoCalGas Gross Compliance Obligation is calculated as the 2022 throughput forecast in the most recent California Gas Report less throughput associated with covered entities plus an estimate for Lost and Unaccounted-For (LUAF) gas and a forecast of emissions for SoCalGas' applicable covered Facilities. SoCalGas' directly allocated allowances are reduced by 60\%, which is the minimum consigned percentage required for 2022 by the Cap-and-Trade Program regulations. The Proxy GHG Allowance price is the 5-day average of forward prices for September 29-30 and October 1, 4, and 5 on the Intercontinental Exchange (ICE) for a California Carbon Allowance (CCA) with December delivery in 2021.

The resulting 2022 Forecast Revenue Requirement is $\$ 436.0$ million (including FF\&U). This is composed of $\$ 421.8$ million for end users, $\$ 11.5$ million for LUAF gas, and $\$ 2.7$ million for company facilities.

In addition, pursuant to Decision 18-03-017 and Advice No. 5426, the 2018 revenue requirement of $\$ 107$ million (including FF\&U) was amortized over an 18 -month period, from April 1, 2019 through September 30, 2020. Therefore, the amount is excluded from the Forecast 2022 Revenue Requirement.

SoCalGas also forecasts to amortize in 2022 rates a $\$ 24.3$ million GHGBA undercollected balance. As a result, the total impact is $\$ 460.3$ million ( $\$ 436.0$ million $+\$ 24.3$ million).

## ATTACHMENT H

Advice No. 5884
Table C: GHG Allowance Proceeds

| Line | Description | 2020 |  |  | 2021 |  |  |  | 2022 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Forecast | Recorded |  | Forecast 1/ |  | Recorded 2/ |  | Forecast | Recorded |
| 1 | Proxy GHG Allowance Price (\$/MT) | \$ | 18.16 |  | \$ | 17.91 |  |  | \$ | 29.26 |  |
| 2 | Directly Allocated Allowances |  | 19,822,267 |  |  | 19,030,307 |  |  |  | 18,238,349 |  |
| 3 | Percentage Consigned to Auction |  | 50\% |  |  | 55\% |  |  |  | 60\% |  |
| 4 | Consigned Allowances |  | 9,911,133 |  |  | 10,466,669 |  |  |  | 10,943,009 |  |
| 5 | Allowance Proceeds | \$ | $(179,966,353)$ | \$ (168,885,706) |  | $(187,437,108)$ |  | $(95,770,013)$ |  | $(320,214,329)$ |  |
| 6 | Previous Year's Revenue Balancing Subaccount Balance | \$ | $(8,282,334)$ |  |  | 21,256,735 |  |  | \$ | $(14,910,521)$ |  |
| 7 | Interest |  |  | \$ 141,830 |  |  |  | 26,366 |  |  |  |
| 8 | Subtotal Allowance Proceeds (\$) (Line 5 + Line $6+$ Line 7) |  | $(188,248,687)$ | \$ (168,743,876) |  | $(166,180,374)$ |  | $(95,743,647)$ | \$ | $(335,124,850)$ |  |
| 9 | Outreach and Admin Expenses (\$) (from Table D) | \$ | - | \$ |  |  |  |  | \$ | - |  |
| 9 b | SB 1477 Compliance Costs 3/ | \$ | 24,630,000 | \$ 36,945,000 |  | 24,630,000 |  | 12,315,000 | \$ | 24,630,000 |  |
| 10 | Net GHG Proceeds Available for Customer Returns (\$) (Line 8 + Line 9 + Line 9b) |  | $(163,618,687)$ | \$ (131,798,876) |  | $(141,550,374)$ |  | $(83,428,647)$ |  | $(310,494,850)$ |  |
| 11 | Number of Residential Households |  | 6,257,534 |  |  | 6,322,188 |  |  |  | 6,361,008 |  |
| 12 | Per Household California Climate Credit (\$) (Line 10 / Line 11) | \$ | (26.15) |  | \$ | (22.39) |  |  | \$ | (48.81) |  |
| Effects of Netting |  |  |  |  |  |  |  |  |  |  |  |
| 13 | Net Revenue after Netting 2015-2017 Costs and Revenues |  |  |  |  |  |  |  |  |  |  |
| 14 | Net GHG Proceeds Available for Customer Returns (\$) (Line 10 + Line 13) |  | $(163,618,687)$ |  |  | $(141,550,374)$ |  |  |  | (310,494,850) |  |
| 15 | Per Household California Climate Credit (\$) (Line 14 / Line 11) | \$ | (26.15) |  | \$ | (22.39) |  |  | \$ | (48.81) |  |

Note 1/ 2021 Forecasted Allowance Proceeds from AL 5712-A.
Note 2/ 2021 Recorded Compliance Instrument Costs include actual expenses for January through August.
Note 3/ Per SB 1477, SoCalGas is required to allocate and fund $\$ 24.63$ million to pay for the BUILD program and TECH Initiative.

## Attachment H - Table C

The same Proxy GHG Allowance Price is used for the forecast of GHG Allowance Proceeds as for the Forecast Revenue Requirement discussed in Table A. Table C estimates the consigned allowances as $60 \%$ of SoCalGas' directly allocated allowances for 2022, consistent with Table A. As a result, SoCalGas calculates Allowance Proceeds of $\$ 320.2$ million. There are no forecasted 2022 Outreach and Administrative Expenses per Table D. However, SoCalGas forecasts an overcollected balance in the Consignment Revenues subaccount of the GHGBA totaling \$14.9 million. Additionally, SoCalGas deducts their proportional share of the first $\$ 50$ million ( $\$ 24.630$ million) of annual allowance proceeds for the Building Initiative for Low-Emissions Development (BUILD) and Technology and Equipment for Clean Heating (TECH) programs, from their calculations of the 2022 Climate Credit. So in total, SoCalGas forecasts 2022 GHG Allowance Proceeds of $\$ 310.5$ million. When distributed to 6.4 million residential households, SoCalGas' 2022 California Climate Credit will be $\$ 48.81$.

## ATTACHMENT H

Advice No. 5884

Table D: GHG Outreach and Administrative Expenses

| Line | Description | 2020 |  |  |  | 2021 |  |  | 2022 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Forecast |  | Recorded |  | Forecast |  | Recorded 1/ | Forecast |  | Recorded |
| 1 | Outreach Expenses |  |  |  |  |  |  |  |  |  |  |
| 2 | Detail of Outreach Activity (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 3 | Subtotal Outreach (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 4 | Administrative Expenses |  |  |  |  |  |  |  |  |  |  |
| 5 | Acquisition (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 6 | Billing (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 7 | Program Management (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 8 | Subtotal Administrative (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 9 | Subtotal Outreach and Administrative (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |
| 10 | Interest (\$) |  |  | \$ | - |  |  |  |  |  |  |
| 11 | Total (\$) | \$ | - | \$ | - | \$ | - |  | \$ | - |  |

## Notes:

Note 1/ Recorded costs for 2021 represent actual expenses from January through August 2021.

Table E: Compliance Obligation Over Time

|  |  | $\mathbf{2 0 1 6}$ | $\mathbf{2 0 1 7}$ | $\mathbf{2 0 1 8}$ | $\mathbf{2 0 1 9}$ | $\mathbf{2 0 2 0}$ |
| :--- | ---: | ---: | ---: | ---: | ---: | :---: |
| Natural Gas Fuel Supplier Compliance Obligation (MTCO | $\mathbf{2} \mathbf{e})$ | $20,563,991$ | $20,697,845$ | $20,661,693$ | $22,217,101$ | $20,774,662$ |
| Company Facility Compliance Obligation $\left(\mathbf{M T C O}_{2} \mathbf{e}\right)$ | 86,710 | 114,690 | 74,824 | 77,450 | 81,362 | $\mathrm{~N} / \mathrm{A}$ |

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

# DECLARATION OF ELVIA LIMA ORTIZ REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.17-09-023 

I, Elvia Lima Ortiz, do declare as follows:

1. I am the Manager of Finance, designated by Elsa Valay-Paz, Vice President, Gas Acquisition for Southern California Gas Company ("SoCalGas"), to submit this declaration. I have been delegated authority to sign this declaration by Elsa Valay-Paz, Vice President, Gas Acquisition. I have reviewed the attached Appendix I to the Annual Regulatory Account Balance Update for Rates Effective January 1, 2022, submitted concurrently herewith (the "Appendix"). In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.
2. I hereby provide this Declaration in accordance with Decision ("D.") D-17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information ("Protected Information") provided in Appendix I submitted concurrently herewith is within the scope of data protected as confidential under applicable law.
3. In accordance with the legal citations and narrative justification described in Attachment A, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 14th day of October 2021, at Los Angeles, California.
/s/ Elvia Lima Ortiz
Elvia Lima Ortiz
Manager of Finance

## ATTACHMENT A

> SoCalGas Request for Confidentiality on the following information in Appendix I of Advice Letter 5884

| Location of Protected Information | Legal Citations | Narrative Justification |
| :---: | :---: | :---: |
| Appendix I - Table B: Recorded GHG Costs | 17 CCR Section 95914(c)(1) <br> D. 15-10-032, including Appendix B (Greenhouse Gas Information Confidentiality Protocols Sections 1.a to 1.c.) <br> CPRA Exemption, Gov't Code §6254.7(d) (Trade Secrets). <br> CPRA Exemption, Gov't Code §6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") <br> - Evidence Code, $\S 1060$ <br> - Civil Code, §3426 et. seq. | 17 CCR Section 95914(c)(1) of the Cap-and-Trade regulations prohibit disclosure of any auction-related information, except when the release is made by a privatelyowned utility to its regulatory agency pursuant to its rules, orders or decisions (Section 95914(c)(2)). Violation of Section 95914 may subject SoCalGas to penalties by the California Air Resources Board. <br> In addition, Table B contains commercially sensitive information the disclosure of which would place SoCalGas at an unfair business disadvantage and results in higher Cap-and-Trade compliance costs for SoCalGas and its end-use ratepayers. <br> SoCalGas derives economic value from this information being confidential, and it is subject to efforts by SoCalGas to maintain its confidentiality. |

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 

# DECLARATION OF DONNA NEWTON REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.17-09-023 

I, Donna Newton, do declare as follows:

1. I am the Contract and Risk Administration Manager, designated by Elsa R. ValayPaz, VP Gas Acquisition for Southern California Gas Company ("SoCalGas"), to submit this declaration. I have reviewed the attached Appendix I to the Annual Regulatory Account Balance Update for Rates Effective January 1, 2022, submitted concurrently herewith (the "Appendix"). In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.
2. I hereby provide this Declaration in accordance with Decision ("D.") D-17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information ("Protected Information") provided in the Appendix submitted concurrently herewith is within the scope of data protected as confidential under applicable law.
3. In accordance with the legal citations and narrative justification described in Attachment A, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this $11^{\text {th }}$ day of October 2021, at Los Angeles, California.

Bonna M. Newton

Donna Newton<br>Contract and Risk Administration Manager

## ATTACHMENT A

## SoCalGas Request for Confidentiality on the following information in Appendix I of Advice Letter 5884

| Location of Protected Information | Legal Citations | Narrative Justification |
| :---: | :---: | :---: |
| Appendix I - Net Natural Gas Compliance Obligation Purchase Limits Highlighted/shaded items | D.15-10-032, including Appendix B (Greenhouse Gas Information Confidentiality Protocols, Section 1.d) <br> CPRA Exemption, Gov't Code §6254.7(d) (Trade Secrets). <br> CPRA Exemption, Gov’t Code §6254(k) ("Records, the disclosur of which is exempted or prohibited pursuant tc federal or state law") <br> - Evidence Code, $\S 1060$ <br> - Civil Code, §3426 et. seq. | Commercially sensitive Cap-and-Trade information such as internal forecast of compliance obligation falls under the "Confidential" category included in the Confidentiality Protocols of D.15-10-032 (Appendix B). Disclosure of this information may place SoCalGas at a competitive disadvantage and result in higher Cap-and-Trade compliance costs for SoCalGas and its end-use ratepayers. <br> SoCalGas derives economic value from this information being confidential, and it is subject to efforts by SoCalGas to maintain its confidentiality. |


[^0]:    ${ }^{1}$ For example, see SoCalGas Advice No. (AL) 5874 - Low Carbon Fuel Standard (LCFS) Program Annual Credit and Revenue Estimates (2022).

[^1]:    ${ }^{2}$ Amounts shown include franchise fees and uncollectibles (FF\&U).

[^2]:    ${ }^{3}$ Amounts shown include FF\&U.

[^3]:    ${ }^{4}$ AL 5698 was submitted September 28, 2020 and made effective October 1, 2020.
    ${ }^{5}$ AL 5870 was submitted September 27, 2021 and made effective October 1, 2021.

[^4]:    * Under the American Rescue Plan Act (ARPA), all prior shortfall amortization bases are deemed fully amortized and a new shortfall amortization base for 2021 is established to the extent there is a funding shortfall. The 2021 base, if any, is amortized over 15 years. In addition, if there is no funding shortfall, the minimum funding requirement is equal to the target normal cost less the excess assets (but not less than \$0).

