

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 5910G
As of February 7, 2022

Subject: Modification to Preliminary Statement Part VI, Residential Disconnection Protections Memorandum Account (RDPMA).

Division Assigned: Energy

Date Filed: 12-03-2021

Date to Calendar: 12-08-2021

Authorizing Documents: D2110012

Disposition:	Accepted
Effective Date:	10-07-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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213-244-2822

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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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
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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

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Los Angeles, CA 90013-1011
Tel: 213.244.3718
Fax: 213.244.4957
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December 3, 2021

Advice No. 5910
(U 904 G)

Public Utilities Commission of the State of California

Subject: Modification to Preliminary Statement Part VI, Residential Disconnection Protections Memorandum Account (RDPMA)

Southern California Gas Company (SoCalGas) hereby submits for approval with the California Public Utilities Commission (Commission or CPUC) modifications to its Preliminary Statement Part VI – Memorandum Accounts, applicable throughout its service territory, as shown on Attachment A.

Purpose

The purpose of this Advice Letter (AL) is to seek approval from the Commission to temporarily record incremental administrative-related costs for the Percentage of Income Payment Plan (PIPP) pilot¹ to the RDPMA, effective the date of Decision (D.) 21-10-012, until the Commission has approved the creation of a PIPP memorandum account (PIPPMA).² Upon approval, PIPP related administrative costs will be transferred from the RDPMA to PIPPMA.

Background

On June 11, 2020, the Commission adopted D.20-06-003, adopting with modifications the interim rules in D.18-12-013 and establishing other process and program changes to address residential disconnections and reconnections. Recognizing a need for transparency and cost recovery, D.20-06-003 permits the investor-owned utilities (IOUs)

¹ Costs include those associated with the PIPP pilot third-party working group facilitator and the PIPP pilot evaluation contractor.

² See D.21-10-012, "Decision Authorizing Percentage of Income Payment Plan Pilot Programs," in Rulemaking (R.) 18-07-005, "Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs."

to establish a memorandum account to track the implementation costs associated with implementing the requirements of this decision.

On April 19, 2021, the Commission approved SoCalGas AL 5672³ which requested establishment of a two-way Residential Uncollectibles Balancing Account (RUBA) and RDPMA to record the operations and maintenance (O&M) and capital-related costs associated with implementing the customer protections authorized in D.20-06-003, as well as waived reconnection charges, effective August 30, 2020.⁴ SoCalGas proposed RUBA to establish a two-way balancing account to create more transparency and to track the uncollectible costs in rates associated with residential customers.⁵ Additionally, SoCalGas requested to establish RDPMA to record and track all incremental costs associated with implementing the customer protections in D.20-06-003.⁶

On October 7, 2021, the Commission adopted D.21-10-012, which authorized the implementation of a PIPP pilot program to reduce residential disconnections of electric and gas service. The PIPP is a program that sets a participant's utility bill payment amounts at an affordable percentage of the participant's monthly income. Implementing the PIPP pilot will require establishing a PIPP working group to advise on Community Choice Aggregator (CCA) implementation, identification of eligible high disconnection rate zip codes, outreach, pilot implementation, the evaluation plan, and any long-term program design, including funding sources for the program.⁷

D.21-10-012 adopted provisions for Southern California Edison Company and Pacific Gas and Electric Company to hire a third-party facilitator to coordinate the pilot working group, which shall convene within 60 days of the decision's effective date,⁸ and to conduct a Request for Proposals to hire an evaluation contractor for the pilots and contract with the evaluation contractor selected by Energy Division staff within six months of the decision, respectively.⁹

D.21-10-012 further clarified that each utility is expected to pay its proportional share of the costs of the third-party facilitator and the evaluation contractor, based on its

³ SoCalGas submitted AL 5672 on July 31, 2020, to establish RUBA and RDPMA in compliance with D.20-06-003.

⁴ See SoCalGas AL 5672, "Establishment of the Residential Uncollectible Balancing Account (RUBA) and Residential Disconnection Protections Memorandum Account (RDPMA), Pursuant to Decision (D.) 20-06-003."

⁵ D.20-06-003, Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customer Disconnections for The Larger California-Jurisdictional Energy Utilities, at Ordering Paragraph (OP) 89 and 91.

⁶ *Id.*, at OP 95.

⁷ D.21-10-012, Decision Authorizing Percentage of Income Payment Plan Pilot Programs, at 68 and Attachment A, at Section 13.

⁸ *Id.*, OP 12.

⁹ *Id.*, OP 13 and Attachment A, at Section 15.

proportional share of the pilot participation cap and these costs will be considered recoverable administrative costs,¹⁰ and that as part of PIPP cost recovery provisions utilities will record all incremental administrative costs of the PIPP pilots in a PIPPMA.¹¹

OP 2 of D.21-10-012 requires the IOUs to submit a Tier 3 AL within 120 days of the effective date of this decision to establish the PIPP memorandum and balancing account to allow for tracking of costs associated with implementing the requirements of the decision. However, prior to the Tier 3 AL submission, SoCalGas will incur administrative costs associated with PIPP and as a result request that incremental PIPP administrative costs will be temporarily recorded in the RDPMA.

Proposed Modifications of SoCalGas' RDPMA

Consistent with IOU communications with Energy Division, SoCalGas submits this AL to modify the RDPMA to temporarily track incurred PIPP administrative costs. Upon approval of the Tier 3 AL, PIPP related costs will be transferred from the RDPMA to PIPPMA. The revised RDPMA is provided on Attachment A.

Protest

Anyone may protest this AL to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this AL, which is December 23, 2021. 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

Copies 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, SoCalGas is currently unable to receive protests or comments to this AL via U.S. mail or fax. Please submit protests or comments to this AL via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Grisel Juarez Velazquez
Sr. Regulatory Tariff Administrator
555 West Fifth Street - GT14D6
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-4957

¹⁰ *Id.*, at 66.

¹¹ *Id.*, at 66, 67, and Conclusion of Law 28.

E-mail: GJuarezVelazquez@socalgas.com

E-mail: Tariffs@socalgas.com

Effective Date

SoCalGas asserts this AL is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests this AL be approved as soon as practicable and made effective October 7, 2021, which is the effective date of D.21-10-012.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.18-07-005. Address change requests to the GO 96-B service list should be directed via e-mail to Tariffs@socalgas.com or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at Process_Office@cpuc.ca.gov.

/s/ Joseph Mock

Joseph Mock

Director - Regulatory Affairs

Attachments

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. 5910

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 59349-G	PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT, RESIDENTIAL DISCONNECTION PROTECTIONS MEMORANDUM ACCOUNT (RDPMA), Sheet 1	Original 57874-G
Revised 59350-G Revised 59351-G	TABLE OF CONTENTS TABLE OF CONTENTS	Revised 59348-G Revised 58993-G

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNT
RESIDENTIAL DISCONNECTION PROTECTIONS MEMORANDUM ACCOUNT (RDPMA)

Sheet 1

1. Purpose

The RDPMA is an interest-bearing memorandum account that is recorded on the Utility's financial statements. The purpose of the RDPMA is to record the incremental costs associated with implementing the customer protections required by Decision (D.) 20-06-003.

D.21-10-012 approved the Percentage of Income Payment Plan (PIPP) program and allowed incremental administrative costs to be recorded in a PIPP memorandum account (PIPPMA), effective October 7, 2021. Pursuant to Advice Letter No. 5910, SoCalGas shall temporarily record PIPP incremental administrative costs in the RDPMA until the Commission has approved the creation of PIPPMA. Upon approval, PIPP-related administrative costs will be transferred from the RDPMA to PIPPMA.

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N

2. Applicability

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

3. Rates

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

4. Accounting Procedures

SoCalGas shall maintain the RDPMA 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 implementing the customer protections authorized in D.20-06-003;
- b. A debit entry equal to waived reconnection charges until addressed in SoCalGas' next general rate case; and
- c. 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

The disposition of the amounts in this account will be addressed in SoCalGas next general rate case or other applicable proceeding.

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 5910
DECISION NO.

ISSUED BY
Dan Skopec
Vice President
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)
DATE FILED Dec 3, 2021
EFFECTIVE Oct 7, 2021
RESOLUTION NO. _____

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The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

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