

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



**Southern California Gas Company**  
**GAS (Corp ID 904)**  
**Status of Advice Letter 5919G**  
**As of February 7, 2022**

Subject: Biannual Report on Cost Impacts Resulting from Decision (D.) 19-08-002 (Core Balancing / Advanced Meter Data Aggregation System) for the Period June 1, 2021, to November 30, 2021.

Division Assigned: Energy

Date Filed: 12-30-2021

Date to Calendar: 01-05-2022

Authorizing Documents: D1908002

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>12-30-2021</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Grisel Juarez Velazquez

213-244-2822

[GJuarezVelazquez@socalgas.com](mailto:GJuarezVelazquez@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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto: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](mailto:JMock@socalgas.com)

December 30, 2021

Advice No. 5919  
(Southern California Gas Company U 904 G)

Advice No. 3054-G  
(San Diego Gas & Electric Company U 902 G)

Public Utilities Commission of the State of California

**Subject: Information-Only – Biannual Report on Cost Impacts Resulting from Decision (D.) 19-08-002 (Core Balancing / Advanced Meter Data Aggregation System) for the Period June 1, 2021, to November 30, 2021**

### **Purpose**

Pursuant to Ordering Paragraph (OP) 4 of D.19-08-002 (decision), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) collectively submit this Tier 1 Information-Only Advice Letter (AL) providing a biannual report on cost impacts to core customers as a result of requiring core customers to balance to estimated actual consumption, including number of Operational Flow Order (OFO) days and Gas Acquisition's mitigation measures.

### **Background**

D.19-08-002 required the SoCalGas Gas Acquisition Department to balance core deliveries to estimated actual consumption instead of a forecast, beginning April 1, 2020.<sup>1</sup> In support of this objective, D.19-08-002 directed SoCalGas and SDG&E to begin building an "Advanced Metering Infrastructure Data Aggregation System" (AMI DAS) as described within the decision.<sup>2</sup> While D.19-08-002 stated that SoCalGas and SDG&E should make all reasonable efforts to ensure the AMI DAS was completed by April 1, 2020,<sup>3</sup> the decision also adopted a formula for use in estimating retail core consumption starting April 1, 2020, should the AMI DAS not be completed by that date.<sup>4</sup>

---

<sup>1</sup> D.19-08-002 at p. 32, (OP 2).

<sup>2</sup> *Id.* at p. 33, (OP 5).

<sup>3</sup> *Id.* at p. 34, (OP 9).

<sup>4</sup> *Id.* at pp. 32-33, (OP 3).

On September 3, 2019, SoCalGas submitted Advice No. 5511, providing its roadmap (on behalf of SoCalGas and SDG&E) for completing the AMI DAS. SoCalGas stated that the AMI DAS could not be completed until August 1, 2020, and further explained how SoCalGas would comply with D.19-08-002's requirement for Gas Acquisition to balance to estimated actual consumption starting April 1, 2020, while the AMI DAS was still being completed. SoCalGas' AMI DAS roadmap was approved by Resolution (Res.) G-3563 on March 12, 2020.<sup>5</sup> The AMI DAS was fully implemented effective November 1, 2020.

In requiring Gas Acquisition to balance to estimated actual consumption rather than a forecast starting April 1, 2020, the Commission in D.19-08-002 also noted that "the cost impact to core customers remains an important consideration."<sup>6</sup> The Commission sought to monitor the situation to ensure that core customers are not significantly impacted, and in doing so, required SoCalGas and SDG&E to "biannually submit an information only advice letter that reports any cost impacts to core customers as a result of balancing to actual usage, including number of OFO days and Gas Acquisition mitigation measures taken..."<sup>7</sup>

### **Report on Cost Impacts to Core Customers**

#### *Operational Flow Order Dates and Noncompliance Charges*

For the reporting period June 1, 2021, through November 30, 2021, there were 89 OFOs declared by SoCalGas' System Operator. The following table provides the number of OFOs by month for each of the balancing tolerances:

---

<sup>5</sup> On June 25, 2020, SoCalGas submitted a letter to Executive Director Alice Stebbins seeking an extension of time to comply with OP 1 of Res. G-3563 due to implementation delays resulting from the COVID-19 emergency condition. The request was subsequently approved postponing DAS full implementation to November 1, 2020.

<sup>6</sup> D.19-08-002 at pp. 17-18.

<sup>7</sup> *Id.* at p. 33, (OP 4).

	Number of Declared OFOs	Tolerances of Declared OFOs
<b><u>Low OFOs</u></b> <sup>8</sup>		
June	2	-5% (2)
July	3	-5% (3)
August	1	-5% (1)
September	0	N/A
October	1	-5% (1)
November	3	-5% (3)
<b><u>High OFOs</u></b>		
June	12	9% (2), 10% (2), 14% (4), 15% (4)
July	4	7% (1), 14% (1), 15% (2)
August	12	3% (4), 4% (3), 5% (4), 9% (1)
September	14	2% (6), 3% (7), 6% (1)
October	27	1% (3), 2% (10), 3% (10), 4% (3), 5% (1)
November	10	5% (3), 14% (2), 15% (5)

SoCalGas' Gas Acquisition Department did not incur noncompliance charges for the reporting period June 1, 2021, through November 30, 2021.

#### *Mitigation Measures Taken*

SoCalGas' Gas Acquisition Department took several mitigation measures to minimize its exposure to noncompliance charges on OFO days. Gas Acquisition believes these mitigation measures have resulted in lost opportunities for reducing procurement costs against benchmark for the benefit of bundled core customers. These cost impacts are not calculable without making significant assumptions, which affect their usefulness.

1. Gas Acquisition continued to use daily Usage Guidelines to address observed uncertainty in forecast core demand. These Usage Guidelines reflected observed deviations between historical same day usage forecasts provided by the Regulatory Forecasting Group and estimated actual usage which were periodically monitored. Additional usage uncertainties resulted from COVID-19 virus-related business impacts first observed in mid-March 2020. Changes to both core residential and core commercial and industrial (C&I) usages remained somewhat unpredictable given historical usage data. Gas Acquisition and the Regulatory Forecasting Group communicated frequently regarding these observations and established formal bi-weekly meetings to discuss trend observations and changes to forecast assumptions.

<sup>8</sup> Low OFO non-compliance charges were waived for October 18, per Rule 30, Section G.1.h.

2. Gas Acquisition's Usage Guidelines assisted in determining the likelihood of whether planned daily deliveries would result in daily OFO non-compliance charges. Use of the Usage Guideline resulted in Gas Acquisition reducing its deliveries on days when High OFOs were anticipated or observed and increasing its deliveries on days when Low OFOs were observed. Gas Acquisition's Usage Guidelines were modified when deemed appropriate.
3. Starting February 1, 2021, the nomination deadline for Cycle 6 was moved to the day after flow. This change allowed Gas Acquisition the opportunity to use the preliminary usage data from AMI DAS to adjust Cycle 6 nominations into and out of its storage account when sufficient injection or withdrawal capacity remained on OFO days.
4. Gas Acquisition met its Gas Cost Incentive Mechanism July 31 and November 1 storage targets.

### **Protest and Reply**

This is an information-only AL submittal. Pursuant to General Order (GO) 96-B Section 6.2, Joint IOUs are not seeking relief through this AL and thus this AL is not subject to protest.

### **Effective Date**

Pursuant to OP 4 of D.19-08-002, SoCalGas and SDG&E request that this Tier 1 information-only AL become effective upon the date of submittal, which is December 30, 2021.

### **Notice**

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A.17-10-002. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto: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](mailto:Process_Office@cpuc.ca.gov).

*/s/ Joseph Mock*

Joseph Mock  
Director – Regulatory Affairs



# 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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss 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](mailto: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: