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February 16, 2023

Advice No. 5950-A
(U 904 G)

Public Utilities Commission of the State of California

Subject: SUPPLEMENT - 2023 and 2024 Ratemaking Forecasts for Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA), Natural Gas Leak Abatement Program Balancing Account (NGLAPBA), and Natural Gas Leak Abatement Program Subaccount (NGLAP) in the New Environmental Regulation Balancing Account (NERBA)

Southern California Gas Company (SoCalGas) hereby submits its 2023 and 2024 Ratemaking Forecasts for the NGLAPMA, NGLAPBA, and NGLAP pursuant to Ordering Paragraph (OP) 10 of the California Public Utilities Commission's (Commission) First Phase Decision (D.) 17-06-015 and Second Phase D.19-08-020.

Purpose

This compliance submittal seeks approval of the Commission for the 2023 and 2024 Ratemaking Forecasts for the NGLAPMA, NGLAPBA, and NGLAP.

This submittal replaces Advice No. (AL) 5950, submitted March 15, 2022, in its entirety, to remove the Leak and Vented Emission Reduction Transmission Compressor Facilities Program (Chapter 21 of the 2022 Compliance Plan) and the High-Bleed Device Replacements (Chapter 26 of the Compliance Plan), to revise the Aerial Methane Mapping (Chapter 14 of the 2022 Compliance Plan), and to reduce the forecasted costs for 2023, 2024, and the associated best practices.

Background

On January 22, 2015, the Commission issued Rulemaking (R.) 15-01-008 to implement provisions of Senate Bill (SB) 1371. Phase I of R.15-01-008 was established to specifically address the overall policies and guidelines for a Natural Gas Leak Abatement Program consistent with SB 1371 and included the following program development activities: 1)

information gathering, measurement, and Best Practices; 2) targets, compliance, and reporting; and 3) training and enforcement.

On June 15, 2017, the Commission adopted D.17-06-015 which, among other things, directed SoCalGas, on or prior to October 31, 2017, to submit a Tier 3 Advice Letter (AL) to provide the following to establish 2018 and 2019 revenue requirement forecasts and caps for the Natural Gas Leak Abatement Program:

- a) Identification of the incremental costs associated with each individual Best Practice, Pilot Projects and Research & Development (R&D), broken down by type of expenditure including capital, operations and maintenance, and administrative.
- b) Justifications consistent with the criteria to evaluate Pilot Projects and R&D in Pub. Util. Code § 740.1.
- c) Allocation methodology for amortization of the account and the corresponding Commission decision authorizing the allocation methodology.¹

Additionally, OP 11 of D.17-06-015 authorized the Director of Energy Division to recommend a process for reviewing cost forecasts and the methods for cost recovery in response to the Tier 3 ALs. OP 12 states the ratemaking forecasts and caps that the Commission approves in response to the Tier 3 ALs shall apply until ratemaking amounts and treatment for the Natural Gas Leak Abatement Program for 2020 and beyond, including Best Practices, Pilot Projects and R&D, are reviewed and established in each Utility's² next General Rate Case (GRC) or other gas ratemaking proceeding.

On October 31, 2017, in compliance with D.17-06-015, SoCalGas submitted its Tier 3, AL 5211. After the total cost estimates were finalized for AL 5211, SoCalGas identified updates were needed to the cost estimates. On March 14, 2018, SoCalGas submitted supplemental AL 5211-A, which replaced AL 5211 in its entirety, to update the cost estimates. Pursuant to the Energy Division's request to update the total cost estimates in AL 5211-A, on July 31, 2018, SoCalGas submitted supplemental AL 5211-B, which replaced AL 5211-A in its entirety. On October 19, 2018 the Commission approved supplemental AL 5211-B.

On August 15, 2019, the Commission adopted a Second Phase Decision, D.19-08-020, establishing additional policies, including requiring use of the Utility Proposed Cost-Effectiveness Methodology and two Cost-Benefit Analyses and restriction on rate recovery beginning in 2025, for methane emissions greater than 20% below the 2015 baseline levels.

In January 2020, the CPUC issued D.20-01-002 which modified the Commission's Rate Case Plan, effectively adopting an extension of the GRC cycle for each utility from three years to four years and extended SoCalGas' current GRC through 2023.³ AL 5603 provided forecasted costs for 2021 and 2022. On June 25, 2020, Energy Division directed SoCalGas

¹ D.17-06-015, OP 10 at pp. 161-162.

² The Utilities are Pacific Gas and Electric Company, SoCalGas, and San Diego Gas and Electric Company (SDG&E).

³ SoCalGas' next GRC application will be for TY 2024 and is anticipated to be filed by May 15, 2022.

to supplement AL 5603-A with a shortened protest comment period of ten (10) days, since no protests were submitted to the initial ALs. Therefore, AL 5603-B, submitted on June 29, 2020, replaced AL 5603-A in its entirety to revise the protest period. Subsequently, pursuant to Energy Division’s request dated April 16, 2020, on October 2, 2020, SoCalGas submitted a supplemental AL 5603-C to its 2021 and 2022 Ratemaking Forecasts for the NGLAPMA, NGLAPBA, and NGLAP in the NERBA. AL 5603-C replaced AL 5603-A and AL 5603-B in their entirety to correct inadvertent errors in Attachment A and Table 4, and to include Attachment B. On December 17, 2020, the Commission issued Resolution G-3576 approving supplemental AL 5603-C.

Per OP 12 of D.17-06-015, the First Phase Decision, requires SoCalGas and SDG&E to present the ratemaking amounts and treatment for the NGLA Program, including best practices, pilot projects and research and development, through a Tier 3 AL process until “each utility’s next general rate case....” On September 29, 2021, SoCalGas and SDG&E submitted a Request for Extension of Time to Comply with OP 12 of D.17-06-015 to continue the current Tier 3 AL process for providing information on the NGLA Program instead of incorporating the requirements of the NGLA Program into their upcoming GRC (anticipated to be filed May 15, 2022). SoCalGas and SDG&E requested to provide this information in the Test Year (TY) 2028 GRC, anticipated to be filed by May 15, 2026.

On November 18, 2021, the CPUC granted SoCalGas’s and SDG&E’s Request for an Extension of Time to extend the deadline to comply with OP 12 of D.17-06-015 from the TY 2024 GRC, to the following GRC for TY 2028 and continue submitting Tier 3 ALs until the following TY 2028 GRC applications, anticipated to be filed by May 15, 2026.

Therefore, this AL is submitted to provide forecasted costs for 2023, 2024, and associated Best Practices, as shown in Table 1 through Table 3.

SoCalGas’ Forecasted Costs for 2023 and 2024, and Associated Best Practices

Table 1: Forecasted Costs for Two-Way Balancing Account by Chapter in Loaded 2021 Dollars⁴

Ch #	Chapter Description	Addressed Best Practice	Program Summary (Direct)			Program Summary (Loaded)*			Program Summary (Revenue Requirement)
			O&M Total	Capital Total	Measure Total	O&M Total	Capital Total	Measure Total	Measure Total
1	Leak Inventory Reduction	15,16, 20a, 21	43,147,636	25,563,843	68,711,479	68,479,920	37,383,090	105,863,010	\$133,754,648
2	Increased Leak Survey	15, 16	7,230,244	30,000	7,260,244	15,577,921	51,150	15,629,071	16,358,146
3	Pipeline Blowdown Reduction Activities	23, 3-7	6,952,540	31,454,525	38,407,065	12,130,733	41,013,770	53,144,503	118,948,939
4	Large Leak Prioritization	15, 16, 20a, 21	-	-	-	-	-	-	-

⁴ Totals may not add up due to rounding.

Ch #	Chapter Description	Addressed Best Practice	Program Summary (Direct)			Program Summary (Loaded)*			Program Summary (Revenue Requirement)
			O&M Total	Capital Total	Measure Total	O&M Total	Capital Total	Measure Total	Measure Total
5	Damage Prevention Algorithm & Proactive Intervention	24, 25, 26	2,140,000	-	2,140,000	4,708,000	-	4,708,000	4,918,035
6	Advanced Meter Analytics Algorithm	17	500,000	-	500,000	605,000	-	605,000	631,990
7	Recordkeeping IT Project	9	2,152,500	5,319,600	7,472,100	3,460,479	8,367,216	11,827,695	15,123,558
8	Geographic Tracking - AVEVA	9, 20b	15,164,000	-	15,164,000	19,833,440	-	19,833,440	20,709,418
9	Competency Based Training Development	13	370,000	-	370,000	566,500	-	566,500	590,184
10	Training Facility Enhancements	13	-	900,000	900,000	-	1,207,800	1,207,800	2,010,503
11	Blowdown Reduction Projects at Storage	23	40,000	17,140,000	17,180,000	88,000	21,868,000	21,956,000	67,072,324
12	Stationary Methane Detectors	18	732,820	4,047,406	4,780,226	1,442,102	6,135,837	7,577,940	16,877,855
13	Electronic Leak Survey	20b	2,020,250	9,294,189	11,314,439	2,444,503	13,505,903	15,950,405	28,941,946
14	Aerial Methane Mapping	16, 17, 20a	22,368,052	3,419,650	25,787,702	34,765,020	6,812,905	41,577,925	46,447,386
15	Damage Prevention Public Awareness	24, 25, 26	2,254,000	-	2,254,000	3,202,540	-	3,202,540	3,345,413
16	Pipe Fitting Specifications	22	1,808,800	-	1,808,800	3,238,048	-	3,238,048	3,382,505
17	Repeat Offenders IT Systems	26	300,000	-	300,000	660,000	-	660,000	689,444
18	Accelerated Leak Repair - Transmission	21	-	5,000,000	5,000,000	-	7,287,500	7,287,500	19,440,118
19	Gas Speciation - Enhanced Methane Detection	17	440,000	-	440,000	928,400	-	928,400	969,818
20	Public Leak Maps	20b	300,000	-	300,000	660,000	-	660,000	689,444
21	Leak and Vented Emission Reduction - Transmission Compressor Facilities	21,23	-	-	-	-	-	-	-
22	Vapor Collection Systems	23	-	-	-	-	-	-	-

Ch #	Chapter Description	Addressed Best Practice	Program Summary (Direct)			Program Summary (Loaded)*			Program Summary (Revenue Requirement)
			O&M Total	Capital Total	Measure Total	O&M Total	Capital Total	Measure Total	Measure Total
23	Distribution Above Ground Leak Survey	19	-	-	-	-	-	-	-
24	Storage Above Ground Leak Survey	19, 21	1,430,576	235,000	1,665,576	2,980,947	284,350	3,265,297	3,842,309
25	Distribution Above Ground Leak Repair	19, 21	-	-	-	-	-	-	-
26	High Bleed Device Replacement	23	-	-	-	-	-	-	-
Total			109,351,418	102,404,213	211,755,631	175,771,553	143,917,521	319,689,074	504,743,983

*Costs are inclusive of a 10% contingency

The assumptions for the cost estimates above can be found in the 2022 Leak Abatement Compliance Plan (Compliance Plan). The 2022 Compliance Plan is organized by chapter and not all Best Practices appear chronologically.

Table 2: Forecasted Costs for One-Way Balancing Account in Loaded 2021 Dollars

Ch #	Chapter Description	Addressed Best Practice	Program Summary (Direct)			Program Summary (Loaded)*			Program Summary (Revenue Requirement)
			O&M Total	Capital Total	Measure Total	O&M Total	Capital Total	Measure Total	Measure Total
R&D	Research & Development	R&D	9,124,567	-	9,124,567	13,812,662	-	13,812,662	14,429,709

*Costs are inclusive of a 10% contingency

The assumptions and details for the R&D cost estimates above can be found in the 2022 Compliance Plan, which also provides the justifications consistent with the criteria to evaluate Pilot Projects and R&D pursuant to Pub. Util. Code § 740.1.

Table 3: Forecasted Costs for Memorandum Account in Loaded 2021 Dollars

Memo Account	Program Administration	Program Summary (Direct)			Program Summary (Loaded)*			Program Summary (Revenue Requirement)
		O&M Total	Capital Total	Measure Total	O&M Total	Capital Total	Measure Total	Measure Total
		2,291,922	-	2,291,922	4,186,001	-	4,186,001	4,372,749

*Costs are inclusive of a 10% contingency

The cost estimates for the program administration were based on historical costs and estimated labor to complete the Annual Emissions report and 2022 Compliance Plan.

Allocation Methodology for Amortization of the Account and Corresponding Commission Decision Authorizing the Allocation Methodology

Consistent with the 2020 Compliance Plan, SoCalGas proposes to allocate the projected year-end balances pertaining to Natural Gas Leak Abatement Programs using the Equal Percent of Authorized Margin (EPAM) method. The EPAM method allocates the balance in an account across customer classes based on each customer class share of the total GRC base margin allocated to that customer class, as shown in Table 4. This proposed method is consistent with how a regulatory account balance that benefits all customer classes is allocated in a GRC.⁵

Table 4: SoCalGas NGLAP Cumulative Revenue Requirement and Annual for 2023 and 2024

Cumulative Revenue Requirement (without FF&U) (\$000)	Annual Revenue Requirement (\$000)	
	2023	2024
221,238	103,766	117,472

Updated rate impacts can be found in Attachment A. The rate impacts are compared to current rates, with 2022 NGLAP amortization of \$82.9 million (without FF&U).

Future Costs for the Natural Gas Leak Abatement Program

As directed in D.17-06-015 and D.19-08-020, and subsequently as granted by the Commission,⁶ future costs for the Natural Gas Leak Abatement Program for SoCalGas will ultimately be incorporated into the TY 2028 GRC, anticipated to be filed by May 15, 2026.

Protests

SoCalGas asks that the Commission, pursuant to General Order (GO) 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice No. 5950 and not reopen the protest period. The modifications included in this supplemental AL do not make substantive changes that would affect the overall evaluation of the AL.

⁵ For example, pursuant to D.16-06-054 (decision addressing SoCalGas' 2016 GRC), the balance in the Research, Development and Demonstration Expense Account (RDDEA) is allocated across all customer classes using the EPAM method. The balance in this account reflects costs associated with activities to benefit all customer classes.

⁶ On November 18, 2021, the CPUC granted SoCalGas' and SDG&E's Request for an Extension of Time to extend the deadline to comply with OP 12 of D.17-06-015 from the utilities' GRCs for TY 2024, to the following GRC for TY 2028.

Effective Date

OP 10 of D.17-06-015 directs SoCalGas to submit this AL as Tier 3 pursuant to General Order (GO) 96-B and, as such, requires a Resolution to be issued by the Commission. SoCalGas respectfully requests that it be approved by the Commission at the earliest opportunity.

Notice

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.15-01-008. Address change requests to the GO 96-B service list should be directed by e-mail to Tariffs@socialgas.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 by e-mail at Process_Office@cpuc.ca.gov.

/s/ Joseph Mock
Joseph Mock
Director – Regulatory Affairs

Attachments



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ATTACHMENT A

Advice No. 5950-A

**Natural Gas Transportation Rate Revenues
Leak Abatement Years 2023 & 2024**

Attachment A
Advice No. 5950-A
Natural Gas Transportation Rate Revenues
Southern California Gas Company
2023

	Present Rates			Proposed Rates			Changes			
	Jan-1-23	Average	Jan-1-23	2023	Proposed	2023	Revenue	Rate	% Rate	
	Volumes	Rate	Revenues	Volumes	Rate	Revenues	Change	Change	change	
	Mth	\$/therm	\$000's	Mth	\$/therm	\$000's	\$000's	\$/therm	%	
	A	B	C	D	E	F	G	H	I	
1	CORE									
2	Residential	2,346,353	\$1.17795	\$2,763,896	2,346,353	\$1.18404	\$2,778,187	\$14,291	\$0.00609	0.5%
3	Commercial & Industrial	992,706	\$0.66518	\$660,326	992,706	\$0.66809	\$663,219	\$2,894	\$0.00291	0.4%
4										
5	NGV - Pre SempraWide	178,769	\$0.31397	\$56,129	178,769	\$0.31506	\$56,324	\$195	\$0.00109	0.3%
6	SempraWide Adjustment	178,769	\$0.01298	\$2,321	178,769	\$0.01308	\$2,338	\$17	\$0.00010	0.7%
7	NGV - Post SempraWide	178,769	\$0.32696	\$58,450	178,769	\$0.32814	\$58,662	\$212	\$0.00119	0.4%
8										
9	Gas A/C	416	\$0.32830	\$137	416	\$0.32922	\$137	\$0	\$0.00092	0.3%
10	Gas Engine	22,302	\$0.23060	\$5,143	22,302	\$0.23060	\$5,143	\$0	\$0.00000	0.0%
11	Total Core	3,540,545	\$0.98515	\$3,487,951	3,540,545	\$0.99006	\$3,505,348	\$17,397	\$0.00491	0.5%
12	NONCORE COMMERCIAL & INDUSTRIAL									
13	Distribution Level Service	919,735	\$0.19641	\$180,641	919,735	\$0.19707	\$181,249	\$608	\$0.00066	0.3%
14	Transmission Level Service (2)	626,080	\$0.05111	\$32,000	626,080	\$0.05130	\$32,115	\$114	\$0.00018	0.4%
15										
16	Total Noncore C&I	1,545,814	\$0.13756	\$212,641	1,545,814	\$0.13803	\$213,364	\$723	\$0.00047	0.3%
17	NONCORE ELECTRIC GENERATION									
18	Distribution Level Service									
19	Pre Sempra Wide	331,442	\$0.18533	\$61,426	331,442	\$0.18599	\$61,645	\$219	\$0.00066	0.4%
20	Sempra Wide Adjustment	331,442	\$0.00088	\$290	331,442	\$0.00096	\$319	\$29	\$0.00009	9.9%
21	Distribution Level Post Sempra Wide	331,442	\$0.18621	\$61,717	331,442	\$0.18695	\$61,964	\$248	\$0.00075	0.4%
22	Transmission Level Service (2)	2,246,336	\$0.05200	\$116,802	2,246,336	\$0.05218	\$117,213	\$411	\$0.00018	0.4%
23										
24	Total Electric Generation	2,577,778	\$0.06925	\$178,519	2,577,778	\$0.06951	\$179,177	\$658	\$0.00026	0.4%
25										
26	TOTAL RETAIL NONCORE	4,123,593	\$0.09486	\$391,161	4,123,593	\$0.09519	\$392,541	\$1,381	\$0.00033	0.4%
27										
28	WHOLESALE & INTERNATIONAL (excluding SDG&E)	359,267	\$0.04617	\$16,588	359,267	\$0.04636	\$16,654	\$66	\$0.00018	0.4%
29										
30	OTHER SERVICES (SDG&E, UBS, & BTS)	1,118,614		\$555,480	1,118,614		\$555,689	\$209		
31	SYSTEM TOTAL w/BTS	9,142,019	\$0.48689	\$4,451,180	9,142,019	\$0.48898	\$4,470,232	\$19,052	\$0.00208	0.4%
32										
33	EOR Revenues	208,941	\$0.12025	\$25,125	208,941	\$0.12084	\$25,249	\$124	\$0.00059	0.5%
34	Total Throughput w/EOR Mth/yr	9,350,960			9,350,960					

- 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 A
Advice No. 5950-A
Natural Gas Transportation Rate Revenues
Southern California Gas Company
2024

	Present Rates			Proposed Rates			Changes			
	Jan-1-23	Average	Jan-1-23	Jan-1-24	Proposed	Jan-1-24	Revenue	Rate	% Rate	
	Volumes	Rate	Revenues	Volumes	Rate	Revenues	Change	Change	change	
	Mth	\$/therm	\$000's	Mth	\$/therm	\$000's	\$000's	\$/therm	%	
	A	B	C	D	E	F	G	H	I	
1	<u>CORE</u>									
2	Residential	2,346,353	\$1.17795	\$2,763,896	2,346,353	\$1.18850	\$2,788,651	\$24,755	\$0.01055	0.9%
3	Commercial & Industrial	992,706	\$0.66518	\$660,326	992,706	\$0.67023	\$665,338	\$5,012	\$0.00505	0.8%
4										
5	NGV - Pre SempraWide	178,769	\$0.31397	\$56,129	178,769	\$0.31586	\$56,467	\$338	\$0.00189	0.6%
6	SempraWide Adjustment	178,769	\$0.01298	\$2,321	178,769	\$0.01304	\$2,331	\$9	\$0.00005	0.4%
7	NGV - Post SempraWide	178,769	\$0.32696	\$58,450	178,769	\$0.32890	\$58,797	\$347	\$0.00194	0.6%
8										
9	Gas A/C	416	\$0.32830	\$137	416	\$0.32990	\$137	\$1	\$0.00159	0.5%
10	Gas Engine	22,302	\$0.23060	\$5,143	22,302	\$0.23060	\$5,143	\$0	\$0.00000	0.0%
11	Total Core	3,540,545	\$0.98515	\$3,487,951	3,540,545	\$0.99365	\$3,518,066	\$30,115	\$0.00851	0.9%
12	<u>NONCORE COMMERCIAL & INDUSTRIAL</u>									
13	Distribution Level Service	919,735	\$0.19641	\$180,641	919,735	\$0.19755	\$181,694	\$1,053	\$0.00115	0.6%
14	Transmission Level Service (2)	626,080	\$0.05111	\$32,000	626,080	\$0.05142	\$32,192	\$191	\$0.00031	0.6%
15										
16	Total Noncore C&I	1,545,814	\$0.13756	\$212,641	1,545,814	\$0.13836	\$213,886	\$1,244	\$0.00081	0.6%
17	<u>NONCORE ELECTRIC GENERATION</u>									
18	Distribution Level Service									
19	Pre Sempra Wide	331,442	\$0.18533	\$61,426	331,442	\$0.18647	\$61,806	\$379	\$0.00114	0.6%
20	Sempra Wide Adjustment	331,442	\$0.00088	\$290	331,442	\$0.00093	\$308	\$18	\$0.00005	6.0%
21	Distribution Level Post Sempra Wide	331,442	\$0.18621	\$61,717	331,442	\$0.18740	\$62,114	\$397	\$0.00120	0.6%
22	Transmission Level Service (2)	2,246,336	\$0.05200	\$116,802	2,246,336	\$0.05230	\$117,488	\$686	\$0.00031	0.6%
23										
24	Total Electric Generation	2,577,778	\$0.06925	\$178,519	2,577,778	\$0.06967	\$179,602	\$1,083	\$0.00042	0.6%
25										
26	TOTAL RETAIL NONCORE	4,123,593	\$0.09486	\$391,161	4,123,593	\$0.09542	\$393,488	\$2,327	\$0.00056	0.6%
27										
28	WHOLESALE & INTERNATIONAL (excluding SDG&E)	359,267	\$0.04617	\$16,588	359,267	\$0.04648	\$16,698	\$110	\$0.00031	0.7%
29										
30	OTHER SERVICES (SDG&E, UBS, & BTS)	1,118,614		\$555,480	1,118,614		\$555,841	\$361		
31	SYSTEM TOTAL w/BTS	9,142,019	\$0.48689	\$4,451,180	9,142,019	\$0.49049	\$4,484,093	\$32,912	\$0.00360	0.7%
32										
33	EOR Revenues	208,941	\$0.12025	\$25,125	208,941	\$0.12120	\$25,324	\$199	\$0.00095	0.8%
34	Total Throughput w/EOR Mth/yr	9,350,960			9,350,960					

- 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