

Joseph Mock Director Regulatory Affairs

May 26, 2023

Advice No. 6145 (U 904 G)

Public Utilities Commission of the State of California

Subject: Revision of the Ownership Charges in Rule No. 20, Gas Main Extensions and Rule No. 02, Description of Service

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission or CPUC) revisions to its Rule No. 20, Gas Main Extensions and Rule No. 02, Description of Service, applicable throughout its service territory, as shown in Attachment A.

Purpose

SoCalGas proposes to revise the ownership charges described in Rule No. 20 and Rule No. 02.

Background

Section H.2, in Rule No. 20 and Section P.3. c.(3) in Rule No. 02 state that the Utility will periodically review the factors it uses to determine residential and non-residential allowances and monthly ownership charges, respectively. If such review results in a change of more than five percent (5%) in either the allowances or ownership charges, the Utility will submit a tariff revision proposal to the Commission for review and approval. Such proposed changes shall be submitted no sooner than six (6) months after the last revision.¹

SoCalGas used the methodology authorized by the Commission on page 4 of D.07-07-019 to calculate the ownership charges and the non-residential allowance multiplier. The last revision was submitted on May 27, 2022 by Advice No. 5984 and effective July 1, 2022.

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¹ Uniform line extension and service rules for gas and electric utilities were provided as Appendix B in Decision (D.) 94-12-025 of Rulemaking 92-03-050.

Discussion

SoCalGas concluded a review of the factors it uses to determine its residential allowances, non-residential allowances, and ownership charges. This review revealed that updated factors produced a change in the Customer Financed ownership charges beyond the 5% threshold.² Utility Financed ownership charges, Non-Residential Allowance Multiplier, and the Residential Allowances were not beyond the 5% threshold and, therefore, are not being updated. The factors mentioned above should be revised as shown below:

Factor	Current	Updated	% Change	Update Required based on >5% threshold? (Yes/No)	Tariff Schedule
Customer Financed	0.67%	0.75%	13.0%	Yes	Rule 02/20
Utility Financed	1.41%	1.48%	5.0%	No	Rule 02/20
Cost of Service Factor	16.97%	17.81%	5.0%	No	Rule 20
Non-Residential Allowance Multiplier	3.4	3.4	0.0%	No	Rule 20
Residential Allowances					
Water Heat	\$682	\$650	-5.0%	No	Rule 20
Space Heat	\$818	\$779	-5.0%	No	Rule 20
Cooktop & Oven	\$152	\$144	-5.0%	No	Rule 20
Dryer Stub	\$160	\$159	-1.0%	No	Rule 20
Space Cooling	\$0	\$0	0.0%	No	Rule 20

Attachment B illustrates the methodology underlying the calculations of the residential and non-residential allowances and the monthly ownership charges. Consequently, SoCalGas proposes revisions to its tariffs provided as Attachment A.

Proposed Tariff Revisions

Rule No. 02, Section P.3.c.(1)

The Customer Financed monthly ownership charge is revised from 0.67% to 0.75% of the amount advanced.

Rule No. 20, Section I, Definitions

For purposes of calculating the Ownership Charge, the Customer Financed per month factor is revised from 0.67% to 0.75%.

This submittal will not create any deviations from SoCalGas' tariffs, cause withdrawal of service from any present customers, or impose any more restrictive conditions than those which currently exist.

² Per Rule No. 20, H. Special Conditions, 2. Periodic Review.

Advice No. 6145 - 3 - May 26, 2023

Protests

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received within 20 days after the date of this Advice Letter, which is June 15, 2023. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: <u>EDTariffUnit@cpuc.ca.gov</u>

In addition, protests and all other correspondence regarding this Advice Letter should also be sent electronically to the attention of:

Attn: Gary Lenart

Regulatory Tariff Manager

E-mail: <u>GLenart@socalgas.com</u> E-mail: <u>Tariffs@socalgas.com</u>

Effective Date

SoCalGas asserts this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal become effective July 1, 2023, which is 36 calendar days after the date submitted.

Notice

A copy of this advice letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list for A.14-11-004, 2016 General Rate Case. Address change requests to the GO 96-B service list should be directed by e-mail to Tariffs@socalgas.com or call 213-244-2424. 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





California Public Utilities Commission

ADVICE LETTER UMMARY



LIVEROTOTIETT							
MUST BE COMPLETED BY UT	ILITY (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 WATER = Water	(Date Submitted / Received Stamp by CPUC)						
Advice Letter (AL) #:	Tier Designation:						
Subject of AL:							
Keywords (choose from CPUC listing):							
AL Type: Monthly Quarterly Annu-							
if AL submitted in compliance with a Commissi	on order, indicate relevant Decision/Resolution #:						
Does AL replace a withdrawn or rejected AL?	f so, identify the prior AL:						
Summarize differences between the AL and th	e 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 ^{1:}							
Pending advice letters that revise the same ta	riff sheets:						

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. 6145

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 60757-G	Rule No. 02, DESCRIPTION OF SERVICE, Sheet 8	Revised 59848-G
Revised 60758-G	Rule No. 20, GAS MAIN EXTENSIONS, Sheet 13	Revised 59851-G
Revised 60759-G	TABLE OF CONTENTS	Revised 60751-G
Revised 60760-G	TABLE OF CONTENTS, Sheet 1	Revised 60756-G

LOS ANGELES, CALIFORNIA CANCELING Re

Revised Revised

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

60757-G 59848-G

Rule No. 02 DESCRIPTION OF SERVICE

Sheet 8

(Continued)

- P. Special Facilities (Continued)
 - 3. Costs Charged to Applicant for Special Facilities. (Continued)
 - c. Ownership Charge. In addition to providing for the payment of charges under any other applicable tariff, the Applicant will pay ownership charge or charges for either Utility-financed or Customer-financed facilities. The monthly ownership charge for Utility-financed facilities includes depreciation, authorized return, income taxes, property taxes, Operation and Maintenance (O&M) expense, Administrative and General (A&G) expense, Franchise Fees and Uncollectibles (FF&U), property insurance and replacement, if needed, for 60 years at no additional cost to the customer. The monthly ownership charge for Customer-financed facilities includes property taxes, Operation and Maintenance (O&M) expense, Administrative and General (A&G) expense, Franchise Fees and Uncollectibles (FF&U), property insurance and replacement, if needed, for 60 years at no additional cost to the customer. At Utility's discretion, dependent on such factors as the Applicant's creditworthiness, longevity of the project, practicality of collecting periodic payments, administration of the contract and other factors, Utility may require Applicant to pay the monthly Utility-financed or Customer-financed charge, or a lump sum payment, or Utility may agree to other payment arrangements.
 - (1) Monthly Ownership Charge. At the Utility's option, the Applicant will be required to pay monthly Utility-financed or Customer-financed ownership charges, as follows:

Type of Facility	<u>Financing</u>	Monthly Charge
Distribution	Customer	0.75% of the amount advanced
	Utility	1.41% of the additional cost

These monthly ownership charges will commence when the special facilities are first ready to serve, as determined by Utility. Utility will notify Customer of this date, through its first invoice. The monthly ownership charges to Customer will automatically change in the event the rates set forth in this Rule 2 change.

(2) Lump-Sum Payment. At Utility's option, the Applicant may be required to make an equivalent one-time payment in lieu of the monthly charge. The one-time payment will equal the estimated cost of the special facilities, plus the estimated cost of removal or abandonment less the estimated net salvage value of removed or abandoned materials. This payment will be required in the event that the Applicant terminates the use of the special facilities at any time within five (5) years immediately following the date the special facilities are first ready to serve.

(Continued)

(TO BE INSERTED BY UTILITY)
ADVICE LETTER NO. 6145
DECISION NO. 07-07-019

ISSUED BY

Dan Skopec

(TO BE INSERTED BY CAL. PUC)
SUBMITTED May 26, 2023
EFFECTIVE Jul 1, 2023

Sr Vice President Regulatory Affairs EFFECTIVE Ju RESOLUTION NO.

Ι

Revised Revised LOS ANGELES, CALIFORNIA CANCELING

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

60758-G 59851-G

Rule No. 20 GAS MAIN EXTENSIONS

Sheet 13

(Continued)

I. DEFINITIONS (Continued)

MAIN EXTENSION. The length of main and its related facilities required to transport gas from the existing distribution facilities to the point of connection with the service pipe.

A Main Extension consists of new distribution facilities of the Utility that are required to extend service into an open area not previously supplied to serve an Applicant. It is a continuation of, or branch from, the nearest available existing permanent Distribution Main, to the point of connection of the last service. The Utility's Main Extension includes any required Substructures and facilities for transmission taps but excludes service connections, services, and meters.

METER SET ASSEMBLY. Meter, service pressure regulator, and associated fittings.

NET REVENUE. That portion of the total rate that supports Utility's extension costs and excludes such items as fuel costs, transmission, storage, public purpose programs, and other energy adjustment costs that do not support the extension costs.

NON RESIDENTIAL ALLOWANCES NET REVENUE MULTIPLIER. This is a revenue-supported factor determined by Utility that is applied to the net revenues expected from non-residential loads to determine non-residential allowances.

OWNERSHIP CHARGE. The monthly ownership charge is a percentage rate applied against the remaining refundable balance after thirty-six (36) months from the date the Utility is first ready to serve. This charge recovers the cost of operating and maintaining customer-financed facilities that are not fully utilized. The Ownership Charge includes property taxes, Operation and Maintenance (O&M), Administrative and General (A&G), Franchise Fees and Uncollectibles (FF&U), property insurance, and replacement for 60 years at no additional cost. For the purpose of calculating Ownership Charge, a 0.75% per month factor will be used.

PERMANENT SERVICE. Service which, in the opinion of the Utility, is of a permanent and established character. This may be continuous, intermittent, or seasonal in nature.

PROTECTIVE STRUCTURES. Fences, retaining walls (in lieu of grading), barriers, posts, barricades, and other structures as required by the Utility.

RESIDENTIAL DEVELOPMENT. Five (5) or more dwelling units in two (2) or more buildings located on a single parcel of land.

RESIDENTIAL SUBDIVISION. An area of five (5) or more lots for residential dwelling units which may be identified by filed subdivision plans or an area in which a group of dwellings may be constructed about the same time, either by a builder or several builders working on a coordinated basis.

(Continued)

(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 6145 DECISION NO. 07-07-019

ISSUED BY Dan Skopec (TO BE INSERTED BY CAL. PUC)

Sr Vice President Regulatory Affairs

May 26, 2023 SUBMITTED **EFFECTIVE**

RESOLUTION NO.

LOS ANGELES, CALIFORNIA CANCELING Revised CAL. P.U.C. SHEET NO.

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2	Description of Comics		
2	Description of Service	55768-G,55769-G,55770-G,60757-G,55772-G	$ _{\mathrm{T}}$
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10	Service Charges		
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12	Rendering and Payment of Bi	lls 59388-G,57628-G,57629-G,58012-G	
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13	Meters and Equipment		
14		56616-G,56617-G	
15	C	36872-G	
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	58282-G,58283-C	5,58284-G,58285-G,58286-G,58287-G,58288-G,58289-G	
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 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 6145 \\ \text{DECISION NO.} & 07\text{-}07\text{-}019 \\ \end{array}$

ISSUED BY **Dan Skopec**

(TO BE INSERTED BY CAL. PUC) SUBMITTED $May\ 26,\ 2023$

Sr Vice President Regulatory Affairs

EFFECTIVE
RESOLUTION NO.

Revised

CAL. P.U.C. SHEET NO. CAL. P.U.C. SHEET NO.

60760-G 60756-G

Sheet 1

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TABLE OF CONTENTS

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.

GENERAL Cal. P.U.C. Sheet No.
Title Page
Table of ContentsList of Contracts and Deviations
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Part IV Income Tax Component of Contributions and Advances
Part V Balancing Accounts Description and Listing of Balancing Accounts Description and Listing of Balancing Accounts Purchased Gas Account (PGA) Core Fixed Cost Account (CFCA) Noncore Fixed Cost Account (NFCA) Enhanced Oil Recovery Account (EORA) Noncore Storage Balancing Account (NSBA) California Alternate Rates for Energy Account (HSCRA) Hazardous Substance Cost Recovery Account (HSCRA) Gas Cost Rewards and Penalties Account (GCRPA) Pension Balancing Account (PBA) Post-Retirement Benefits Other Than Pensions Balancing Account (RDDGSA) Research Development and Demonstration Surcharge Account (RDDGSA) Demand Side Management Balancing Account (DSMBA) Source S2939-G,59747-G 57363-G,57693-G,57631-G Enhanced Oil Recovery Account (NSBA) 49712-G Noncore Storage Balancing Account (CAREA) 40875-G, 40876-G, 40876-G, 40876-G, 4

(Continued)

 $\begin{array}{ll} \text{(TO BE INSERTED BY UTILITY)} \\ \text{ADVICE LETTER NO.} & 6145 \\ \text{DECISION NO.} & 07\text{-}07\text{-}019 \\ \end{array}$

ISSUED BY **Dan Skopec**

(TO BE INSERTED BY CAL. PUC)
SUBMITTED May 26, 2023

Sr Vice President Regulatory Affairs

EFFECTIVE RESOLUTION NO.

ATTACHMENT B Advice No. 6145

Methodology Underlying Calculations of Residential and Non-Residential Allowances and Monthly Ownership Charges

Attachment B part 1. SoCalGas Allowances Calculation of Line Extension Rate by Class (for distribution level service)

MODEL INFO I	_									_
March, 2023 Rates	Residential	Core C&I	Gas A/C	Gas Engine	NGV	NonCore C&I Distribution	EG-D Tier 1	EG-D Tier 2		
Allocated Base Margin in Transportation Rates	\$2,176,519,434	\$444,758,673	\$62,438	\$13,103,195	\$31,974,589	\$104,994,522	\$15,727,426	\$21,916,836	Water Heat	T
Non-Base Margin Items in Transportation Rates	\$382,078,943	\$181,914,501	\$50,050	(\$7,316,369)	\$31,325,696	\$62,050,402	\$7,874,902	\$6,155,398	Space Heat	
Revenue Requirement in Transportation Rates	\$2,558,598,376	\$626,673,174	\$112,488	\$5,786,826	\$63,300,285	\$167,044,924	\$23,602,328	\$28,072,234	Cooktop & Oven	
									Dryer Stub	
Items Not Used in Line Extension Rate:									Space Cooling	
BBT Transmission Costs	\$51,805,137	\$20,739,951	\$8,344	\$447,034	\$3,583,413	\$18,515,817	\$1,772,952	\$4,870,781		
Local Transmission Costs	\$29,254,410	\$8,758,246	\$1,944	\$72,457	\$1,095,966	\$5,911,855	\$559,538	\$1,515,613		
Core Storage	\$82,574,513	\$16,192,161	\$8,790	\$491,450	\$979,904	\$0	\$0	\$0	LACC factor	
Non-Base Margin items in Transport Rate	\$382,078,943	\$181,914,501	\$50,050	(\$7,316,369)	\$31,325,696	\$62,050,402	\$7,874,902	\$6,155,398	O&M factor	
Items Not Used in Line Extension Rate	\$545,713,003	\$227,604,860	\$69,127	(\$6,305,428)	\$36,984,979	\$86,478,075	\$10,207,392	\$12,541,792	A&G factor	
Line Extension Basis	\$2,012,885,374	\$399,068,314	\$43,361	\$12,092,254	\$26,315,306	\$80,566,850	\$13,394,936	\$15,530,443	FFU factor	
									Property Tax Factor	
Average Year Throughput Therms	2,346,352,645	992,705,676	416,286	22,301,608	178,769,207	919,734,701	88,448,999	242,993,392	60-year replacement multiplie	er
Line Extension Rate (\$ per Therm)	\$0.8579	\$0.4020	\$0.1042	\$0.5422	\$0.1472	\$0.0876	\$0.1514	\$0.0639		
·										
No. Customers	5,714,531	203,514	4	712	378	563	273	8		
Average therms/customer	411	4,878	104,071	31,322	472,934	1,632,305	323,736	28,905,236		
0 Average Gross Transport rate\$/therm	\$1.090	\$0.631	\$0.270	\$0.259	\$0.354	\$0.182	\$0.267	CO 116		
iu Average Gross Transport rate\$/tnerm	\$1.U9U	φυ.631	φυ.27U	φυ.259	φυ.354	φυ.18Z	φυ.267	\$0.116		

Attachment B part 2. SoCalGas Allowances - Calculation of Net Revenue

Line

7b	Line Extension Rate (\$ per Therm)	Net Revenue Line Extension Rate (\$ per Therm)	\$/therm
	see page 1 for details	Residential	\$0.8579
		Non-Residential:	
		Core C/I	\$0.402
		NGV	\$0.147
		Gas A/C	\$0.104
		Gas Engine	\$0.542
		Noncore C/I	\$0.088
		EG Tier 1	\$0.151
		EG Tier 2	\$0.064

8	Average UEC per End-Use/Customer in Therms	Residential	therms/ appliance V5-10-2023	cumulative therms
		Water Heat	135	135
	Source: SoCalGas and SDG&E Analysis of 2019	Space Heat	162	297
	Residential Appliance Saturation Study & 2019	Cooktop & Oven	30	327
	BCAP Decision & Gas Forecasting Dept. and Ken	Dryer Stub	33	360
		Space Cooling	0	360
			therms/ customer	
		Residential Therms/customer	411	
		Core C/I	4,878	
		NGV	472,934	
		Gas A/C	104,071	
		Gas Engine	31,322	
		Noncore C/I	1,632,305	
		EG Tier 1	323,736	
		EG Tier 2	28,905,236	

			Annual Net	cumulative
			revenue	net revenue
9	Average Net Revenue per Customer Type	Residential	\$/appliance	\$'s
	Line 7 * Line 8	Water Heat	\$116	\$116
		Space Heat	\$139	\$255
		Cooktop & Oven	\$26	\$280
		Dryer Stub	\$28	\$309
		Space Cooling	\$0	\$309
			Net revenue	
			\$/customer	
		Residential \$/customer	\$352	_
		Core C/I	\$1,961	
		NGV	\$69,617	
		Gas A/C	\$10,840	
		Gas Engine	\$16,984	
		Noncore C/I	\$142,986	
		EG Tier 1	\$49,027	
		EG Tier 2	\$1,847,421	

10a Cost of Service Factor (Rule 20 Section I DEFINITIONS - COST-OF-SERVICE FACTOR and Rule 2 Section 0.3.c.1)

	2023 ROR	Current tariff	% Difference
LACC factor	9.126%	9.308%	-2.0%
O&M factor	3.584%	3.714%	-3.5%
A&G factor	3.539%	2.599%	36.1%
FFU factor	0.558%	0.454%	22.8%
60-year replacement multiplier	1.0600	1.0556	0.4%
Cost of Service Factor per year	17.81%	16.97%	5.0%
Cost of Service Factor per month	1.48%	1.41%	5.0%

10b Cost of Ownership Factor (Rule 20 Section I - OWNERSHIP CHARGE and Rule 2 Section O.3.c.1)

	2023 ROR	Current tariff	% Difference
Property Tax	0.853%	0.812%	5%
O&M factor	3.584%	3.714%	-4%
A&G factor	3.539%	2.599%	36%
FFU factor	0.558%	0.454%	23%
60-year replacement multiplier	1.0600	1.0556	0%
Cost of Ownership Factor per year	9.04%	8.00%	13%
Cost of Ownership Factor per month	0.75%	0.67%	13%

11a Residential Allowance per Appliance (Rule 20 Section C.3 RESIDENTIAL ALLOWANCES)

Residential	Annual Net revenue \$/appliance	Cost of Service Factor	Residential Allowance \$/appliance	Current Tariff	% Difference
Water Heat	\$116	17.81%	\$650	\$682	-5%
Space Heat	\$139	17.81%	\$779	\$818	-5%
Cooktop & Oven	\$26	17.81%	\$144	\$152	-5%
Dryer Stub	\$28	17.81%	\$159	\$160	-1%
Space Cooling	\$0	17.81%	\$0	\$0	#DIV/0!

11b Residential Allowance Non-Refundable Discount Option (Rule 20 Section D.6.b NON-REFUNDABLE DISCOUNT OPTION)

	Proposed	Current Tariff	% Difference
Residential Non-Refundable Discount Option	50%	50%	0%

11c Multiplier (Rule 20 Section C.4 ALLOWANCES)

	Net Revenue \$/customer	Cost of Service Factor	Allowance \$/Customer	Number of Customers/ rate class	Total Allowances/ rate class \$000s	Revenue Requirement in Transportation Rates/ rate class \$000s	Allowance Multiplier per rate class	Current Tariff	% Difference
Residential Multiplier	\$352	17.81%	\$1,977	5,714,531	\$11,299,312	\$2,558,598	4.4	n/a	>5%
Core C/I NGV Gas A/C	\$1,961 \$69,617 \$10,840	17.81% 17.81% 17.81%	\$11,007 \$390,796 \$60,851	203,514 378 4	\$2,240,166 \$147,721 \$243	\$626,673 \$63,300 \$112	3.6 2.3 2.2		
Gas Engine Noncore C/I	\$16,984 \$142.986	17.81% 17.81%	\$95,337 \$802,653	712 563	\$67,880 \$452,261	\$5,787 \$167.045	11.7 2.7		
EG Tier 1	\$49,027	17.81%	\$275,215	273	\$75,192	\$23,602	3.2		
EG Tier 2	\$1,847,421	17.81%	\$10,370,479	8	\$87,180	\$28,072	3.1		
Non Residential Multplier				205,453	\$3,070,643	\$914,592	3.4	3.4	0%

- <u>Tariff Rule 20 Section H.2 Periodic Review:</u>
 Utility will periodically review the factors it uses to determine its
 - 1) residential allowances
 - non-refundable discount option percentage rate
 Non-Residential Net Revenue Multiplier

 - 4) cost-of-service factor

stated in this rule. If such review results in a change of more than five percent (5%),

the Utility will submit a tariff revision proposal to the Commission for review and

approval. Such proposed changes shall be submitted no sooner than six (6) months after the last revision.

Additionally, Utility shall review and submit proposed tariff revisions to implement relevant

Commission decisions from other proceedings that affect this Rule.