

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



Southern California Gas Company
GAS (Corp ID 904)
Status of Advice Letter 6268G
As of March 25, 2024

Subject: Adherence to Southern California Gas Company's Approved San Joaquin Valley Disadvantaged Communities Safety Plan

Division Assigned: Energy

Date Filed: 02-29-2024

Date to Calendar: 03-04-2024

Authorizing Documents: D1812015

Disposition:	Accepted
Effective Date:	02-29-2024

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Gary Lenart

(213) 244-2424

Tariffs@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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



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

February 29, 2024

Advice No. 6268-G
(U 904 G)

Public Utilities Commission of the State of California

Subject: Adherence to Southern California Gas Company's Approved San Joaquin Valley Disadvantaged Communities Safety Plan

Southern California Gas Company (SoCalGas) hereby submits to the California Public Utilities Commission (Commission) in accordance with Decision (D.) 18-12-015 this Tier 1 Advice Letter documenting SoCalGas's adherence to the approved San Joaquin Valley (SJV) Disadvantaged Communities (DAC) Safety Plan.¹

Purpose

In accordance with Ordering Paragraph (OP) 12, Section (i) of D.18-12-015, SoCalGas submits this Tier 1 Advice Letter (AL) which documents the adherence to SoCalGas's approved Safety Plan, describes health and safety issues encountered, summarizes methods taken to promote retention of accurate records for purposes of equipment maintenance and warranties, and provides additional information deemed relevant. This AL is timely submitted within 90 days of the completion of SoCalGas's SJV Disadvantaged Communities pilot project in California City.

Background

In 2015, the Commission initiated rulemaking (R.) 15-01-030 to identify disadvantaged communities in the SJV to evaluate the feasibility of options to improve access to affordable energy in these communities.² In SoCalGas's service territory, the SJV DAC California City

¹ See SoCalGas Advice Letter 5440-A, Establishment of Pilot Implementation Plan, Pursuant to D.18-12-015, available at https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/submittals/GAS_5440-A.pdf.

² Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Provide Economically Feasible Options for Affordable Energy, R. 15-10-030 at 2 (April 3, 2015).

pilot was designed to replace propane and wood burning appliances with natural gas service so that participating customers may experience energy bill savings.³

On December 19, 2018, the Commission issued D.18-12-015 approving the SJV Disadvantaged Communities pilot projects, including SoCalGas's California City Pilot Project. In D.18-12-015, OP 12, Section i. the Commission directed Southern California Edison Company, SoCalGas, Pacific Gas and Electric Company and the third-party pilot administrator/implementor, to each file a Tier 1 Advice Letter within 90 days of completion of their authorized pilot project implementation activities to document adherence to their approved Safety Plan.

On January 11, 2024, the last California City inspection of the SoCalGas natural gas conversions was completed, thus concluding SoCalGas's SJV pilot project implementation activities. Further details on outreach, installations, and program implementation are detailed in SoCalGas's most recent quarterly report and annual reports filed in R.15-01-030.

Discussion

Safety is a core value and a SoCalGas priority and as such, safety guidelines were embedded into all phases of the SJV Disadvantaged Communities pilot project. Employees and vendors followed applicable laws and regulations, as well as SoCalGas's safety guidelines, while performing their work, and were empowered and encouraged to ask questions, raise concerns, and Stop the Job if needed. This section details the safety concerns and issues identified in the SoCalGas pilot community of California City, and documents SoCalGas's adherence to the SJV DAC Safety Plan.⁴

The discussion below provides specifics of the health and safety issues encountered and methods taken to provide a product warranty.

Health and Safety Issues Encountered

Throughout the outreach, assessment, and installation phases of the pilot project, SoCalGas developed specific processes to assess home conditions, identify safety issues, ensure that contractors received training, and provide warranties to customers for installed measures.

During the outreach stage, one home had a reported safety concern. This issue was reported by the pilot Customer Energy Navigator (CENs), during in-person door-to-door outreach. During outreach by CENs, an owner came to the door with a possible weapon. The CENs immediately stopped outreach activities and left the property, then notified SoCalGas of the incident. SoCalGas documented the property address and incident as a confrontational homeowner and indicated that the homeowner was not to be approached to prevent further issues. This information was also shared with the pilot implementor.

³ D.18-12-015 at 33.

⁴ SoCalGas Advice Letter 5440-A at 10-11.

During the assessment and installation phases of the SoCalGas pilot project, there was one home with a safety issue that was identified by a contractor when returning to fix a circuit breaker. During the correction process, the customer exhibited aggressive behavior towards the contractor's technician. Prioritizing safety, the technician stepped away from the situation to prevent further escalation. The technician was able to successfully fix and resolve the issue despite the aggressive tenant. Notice of the safety issue encounter was documented and provided to SoCalGas and the property landlord. Due to this safety concern, SoCalGas and its contractor, implemented safety measures to protect the contractor during the home inspection appointment. Specifically, during the California City inspection, the contractor requested the landlord be present and also included their experienced lead technician to deter any potential combativeness from the customer. Although the landlord was unable to attend the inspection, the California City inspector was able to successfully complete the inspection with no health or safety issues identified from this home.

Environmental Considerations

Throughout the duration of the pilot project, neither SoCalGas nor any of its contractors experienced any environmental issues. Applicable Natural Gas Appliance Testing (NGAT) was performed according to the Energy Savings Assistance Program California Installation Standards (IS Manual) to test for leakage and proper combustion venting airflow. Also, Pilot Implementors installed commercially available Remote Methane Detectors (RMD) to support the distributed detection of fugitive methane gases.

Hazardous Materials

Throughout the duration of the pilot project, no hazardous materials and/or hazardous waste were discovered, and any construction waste that was generated that had the potential to be hazardous waste, was characterized properly prior to off-site disposal.

Outreach

Community Energy Navigator (CEN) Outreach and Pre-Installation Inspections

In April of 2020, in-person outreach to homes and community meetings were scheduled to begin. Due to the COVID-19 pandemic, SoCalGas's door-to-door customer outreach strategy shifted to contacting the homeowners by phone. Based on this adjusted process, the pilot CENs completed most customer enrollments over the phone.

Once the State of California's, Stay-at-Home Order⁵ was lifted, the CENs supplied their verified customer eligibility lists to SoCalGas's third-party Implementor. All pre-installation safety inspections were conducted in person and on-site assessments were able to be performed with all Centers for Disease Control and Prevention (CDC), state, and local safety requirements in place.

⁵ As California Fully Reopens, Governor Newsom Announces Plans to Lift Pandemic Executive Orders, *available at*: <https://www.gov.ca.gov/2021/06/11/as-california-fully-reopens-governor-newsom-announces-plans-to-lift-pandemic-executive-orders/#:~:text=That%20includes%20terminating%20the%20Stay,county%20tier%20system%20will%20end.>

General and specific safety topics, depending on the tasks, were discussed, and reviewed with all personnel working in the pilot. Starting with the initial contact and household assessments; employees and contractors in the CEN role were directed to be aware of any personal safety issues in the community.

Assessment

Program Implementor

Program implementers were trained and qualified in safety issues related to propane, propane systems, and propane appliances.

During their technical assessments on the home, the technicians were required to report and/or document any customer safety issues that may have existed in the household. Any household issues identified were to be reported immediately to the customer and the project management office (PMO) for immediate review and communication across the pilot to all contractors and third-party vendors. No issues were identified.

Field Employees and Contractors

All To-the-Meter (TTM) and Beyond-the-Meter (BTM) work was performed by SoCalGas field employees and third-party contractors who are subject to permitting and inspection requirements. SoCalGas's principal contractor employed qualified, licensed contractors to perform the necessary construction, plumbing, and electrical work.

During TTM and BTM work, employees and third-party contractors followed company safety standards to properly identify and protect the community and homes. Employees and third-party contractors maintained awareness of personal safety issues that could exist in the household and in the community.

Installation

Product Warranty

Upon completion of a home conversion, SoCalGas field employees and the Pilot Implementors provided and reviewed documentation on household appliance safety and warranties, as well as the SoCalGas Natural Gas Safety Guide. Two-year parts and labor in house warranty information was reviewed and provided directly to each customer, along with a copy of the guarantee of work.

Protest

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 this Advice Letter, which is March 20, 2024. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: EDTariffUnit@cpuc.ca.gov

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: GLenart@socalgas.com
E-mail: Tariffs@socalgas.com

Effective Date

This submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B and OP 12 of D.18-12-015. Accordingly, SoCalGas respectfully requests that this Tier 1 advice submittal be approved and made effective upon date of submittal, which is February 29, 2024.

Notice

A copy of this Advice Letter is being sent to SoCalGas's General Order (GO) 96-B service list and the Commission's service list in R.15-03-010. Address change requests to the GO 96-B service list should be directed via 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 via e-mail at 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 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: